

NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII ENVIRONMENTAL ASSESSMENT (EA) Appendix A Agency Correspondence Table of Contents

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A.1 U.S. FISH AND WILDLIFE SERVICE (USFWS) – ENDANGERED SPECIES ACT (ESA) CONSULTATION

A.1.1 Department of the Navy Request to USFWS for Concurrence on Species List (21Dec17)



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5090
Ser N45/0660
December 21, 2017

CERTIFIED NO: 7015 0640 0002 4677 9602

Dr. Mary Abrams
Field Supervisor
U.S. Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard
Room 3-122
Honolulu, HI 96850

Dear Dr. Abrams:

SUBJECT: REQUEST FOR CONCURRENCE ON SPECIES LIST IN SUPPORT OF AN ENVIRONMENTAL ASSESSMENT RELATED TO THE PROPOSED NAVAL SPECIAL WARFARE COMMAND TRAINING ACTIVITIES IN THE STATE OF HAWAII

The United States (U.S.) Naval Special Warfare Command (Navy) proposes to conduct small unit intermediate and advanced land, air, and maritime training activities. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. Training activities in the water, on the land, or in the air could occur as a single or separate event, or in many cases would be combined together to be performed sequentially to meet the training objectives. Naval Facilities Engineering Command, Pacific (NAVFAC PAC) is preparing an environmental assessment (EA) and a biological evaluation (BE) for the EA's preferred alternative.

Commander, Navy Region Hawaii is requesting your office's concurrence on the attached list of threatened and endangered species and designated critical habitat that may occur within the proposed project area for analysis in the BE (see Attachment 1). The proposed training activities would occur at selected locations, including federal, State, and private property pending appropriate approvals through land-use and real estate agreements (see Attachment 2). Federal properties where training events may be scheduled include: Joint Base Pearl Harbor Hickam, Marine Corps Base Hawaii's Puuloa Range Training Facility, Marine Corps Base Hawaii, Kaneohe Bay, Kahuku Training Area, Dillingham Military Reservation, Kaena Point Satellite Tracking Station, Makua Military Reservation, Lualualei Annex, the U.S. Coast Guard Station at Barbers Point, and Barking Sands/Pacific Missile Range Facility. For the purpose of operational security, more detailed maps and site descriptions can be shared with your office, preferably in "face-to-face" meetings with NAVFAC PAC's subject matter experts and Navy personnel, upon request.

5090
Ser N45/0660
December 21, 2017

On land, the proposed training would include small-unit training activities for purposes of teaching trainees the skills to remain undetected (silent and unseen) and to leave no trace of their presence during or after the training activity. Land-based training events are identified as personnel transiting over the beach on foot, simulating building clearance activities using simulated munitions (used only in limited locations), high angle climbing, and special reconnaissance operations (move into a structure, conduct clearance from room to room, and engage in role-play). Air-based training would include the use of unmanned aircraft systems or naval special operations personnel utilizing drop zones, landing zones, or conducting rope suspension training activities from helicopters.

We look forward to receiving your concurrence on the attached list of species and critical habitat units to be included in the BE. Although a timeframe for responding to this request is not mandated by regulation, according to the *Endangered Species Act Consultation Handbook, Procedures for Constructing Section 7 Consultations and Conferences*, a response is typically received within 30 calendar days of the species list request. We would appreciate adherence to this timeframe.

For questions regarding this consultation and any modifications to the list, please correspond directly with Ms. Norma Creps, Wildlife Biologist, NAVFAC PAC, at norma.creps@navy.mil or (808) 472-1408.

Sincerely,



R. D. HAYES, III
Captain, CED, U.S. Navy
Regional Engineer
By direction of the
Commander

Attachments: 1. ESA Listed Species and Critical Habitat Units within the Proposed Action Area
2. Proposed Training Location Maps

Attachment 1

ESA Listed Species and Critical Habitat Units within the Proposed Action Area

Common Name	Federal Listing Status	Species Present within Training Locations			Critical Habitat within Training Locations		
		Kauai	Oahu	Hawaii	Kauai	Oahu	Hawaii
Lau'ehu <i>Panicum niihauense</i>	Endangered	-	-	-	X	-	-
'Ohai <i>Sesbania tomentosa</i>	Endangered	-	-	-	X	-	-
Hawaiian hoary bat <i>Lasiurus cinereus sematus</i>	Endangered	X	X	X	-	-	-
Hawaiian goose <i>Branta sandvicensis</i>	Endangered	X	-	X	-	-	-
Hawaiian stilt <i>Himantopus mexicanus knudseni</i>	Endangered	X	X	-	-	-	-
Hawaiian coot <i>Fulica alai</i>	Endangered	X	X	-	-	-	-
Hawaiian moorhen <i>Gallinula chloropus sandvicensis</i>	Endangered	X	X	-	-	-	-
Hawaiian duck <i>Anas wyvilliana</i>	Endangered	X	X	-	-	-	-
Newell's shearwater <i>Puffinus newelli</i>	Threatened	X	-	-	-	-	-
Band-rumped storm petrel <i>Oceanodroma castro</i>	Endangered	X	-	-	-	-	-
Hawaiian petrel <i>Pterodroma phaeopygia sandwichensis</i>	Endangered	X	-	-	-	-	-
Yellow-faced bee <i>(Hylaeus spp.)</i>	Endangered	X	X	-	-	-	-
Orangeblack Hawaiian damselfly <i>(Megalagrion xanthomelas)</i>	Endangered	-	X	-	-	-	-
Green sea turtle <i>Chelonia mydas</i>	Threatened	X	X	X	-	-	-
Hawksbill sea turtle <i>Eretmochelys imbricata</i>	Endangered	X	X	X	-	-	-
Olive ridley sea turtle <i>Lepidochelys olivacea</i>	Endangered	-	X	-	-	-	-

"FOR OFFICIAL USE ONLY". May be Exempt from Release Under FOIA

Attachment 2: Training Location Maps

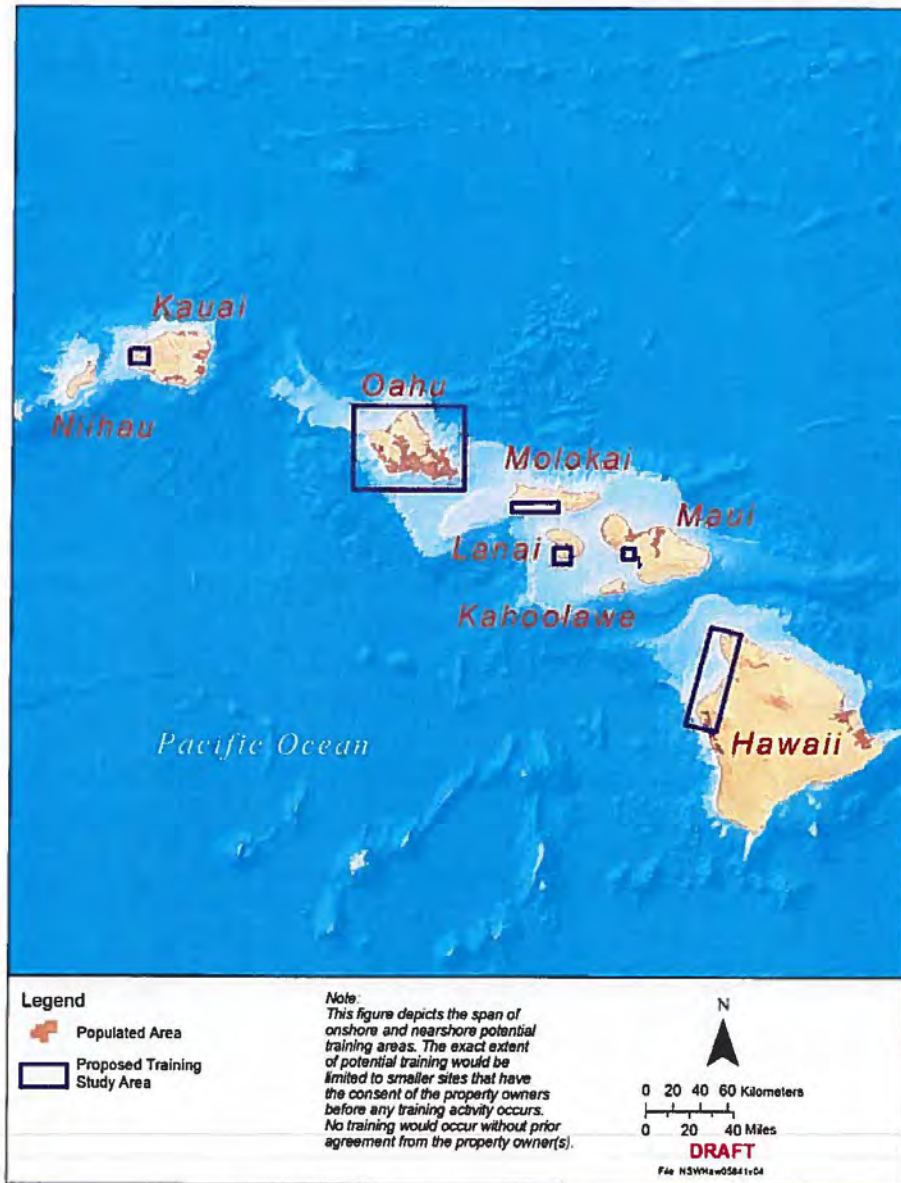


Figure 1: Location Overview – Training Study Area

Note: Islands of Molokai, Lanai and Maui do not include onshore training. Training near these islands is water-based.

Attachment 2: Training Location Maps



Figure 2: Oahu Island Training Study Area

Attachment 2: Training Location Maps

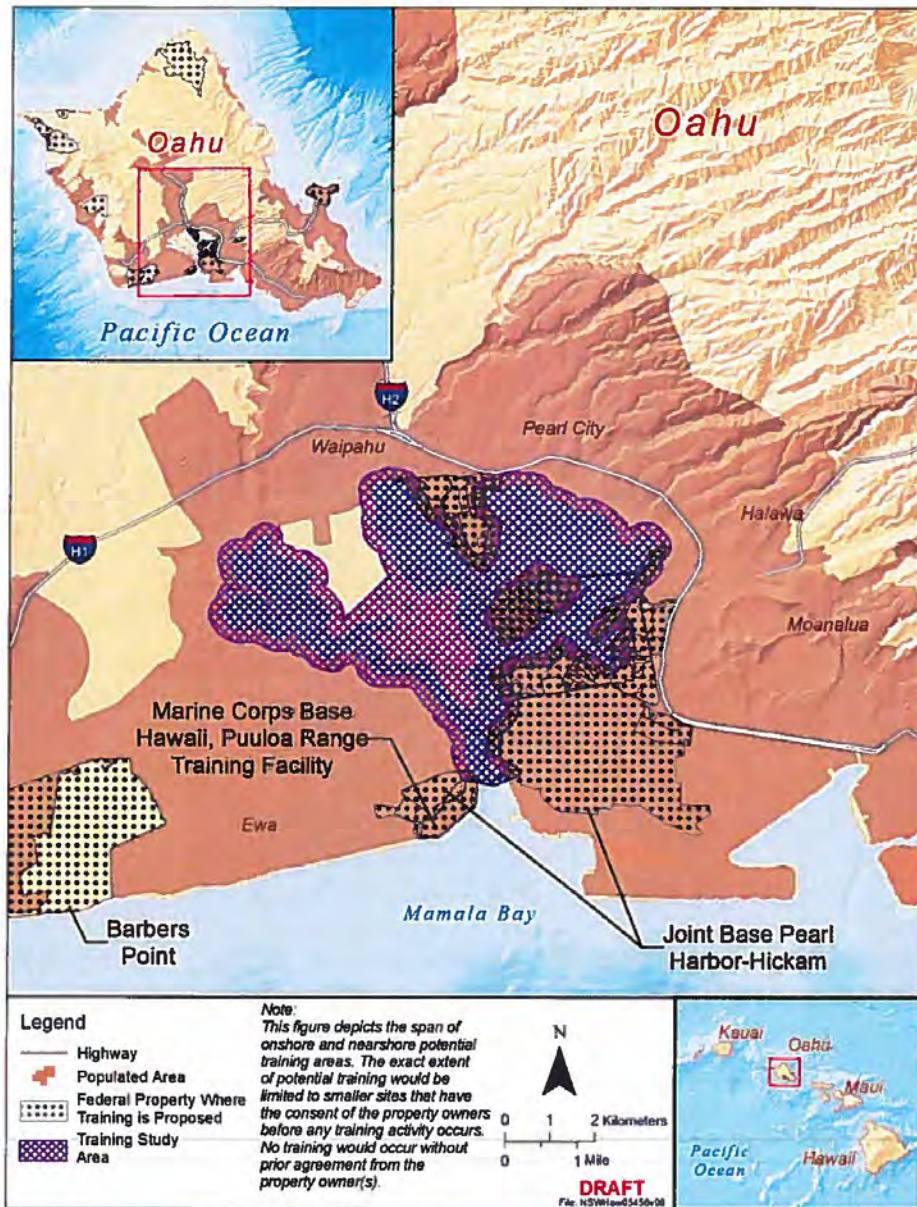


Figure 3: Oahu Joint Base Pearl Harbor-Hickam Training Study Area

Attachment 2: Training Location Maps

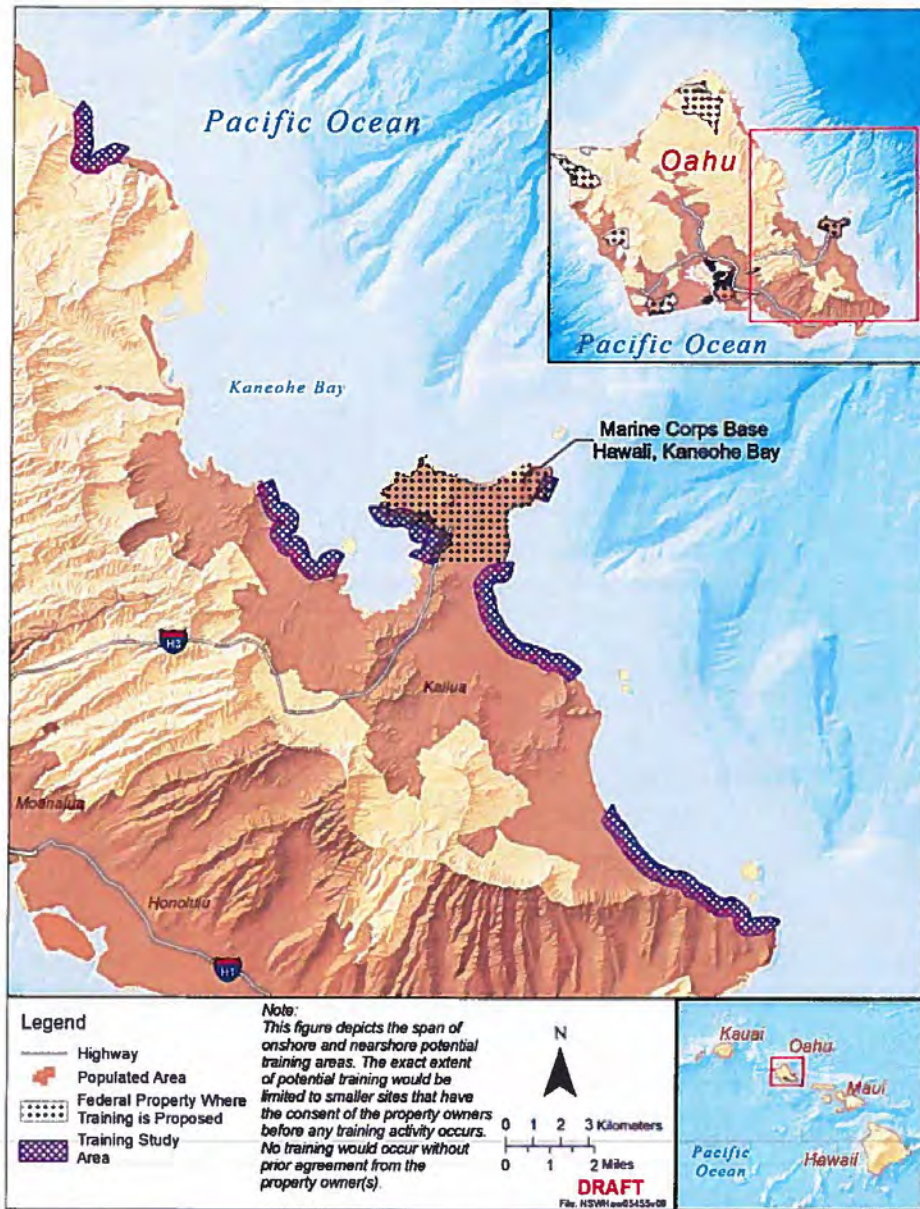


Figure 4: Oahu Windward Region Training Study Area

Attachment 2: Training Location Maps

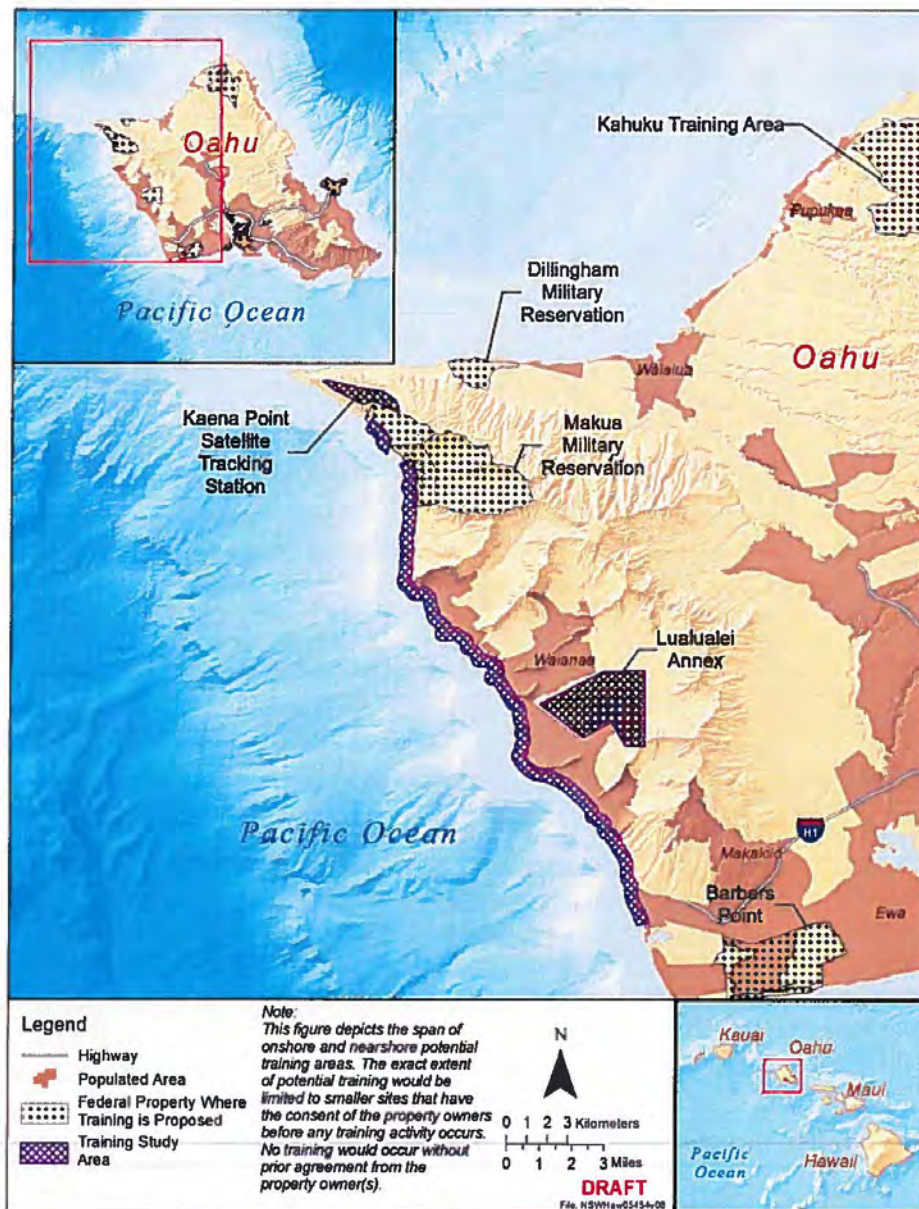


Figure 5: Oahu West Region Training Study Area

Attachment 2: Training Location Maps

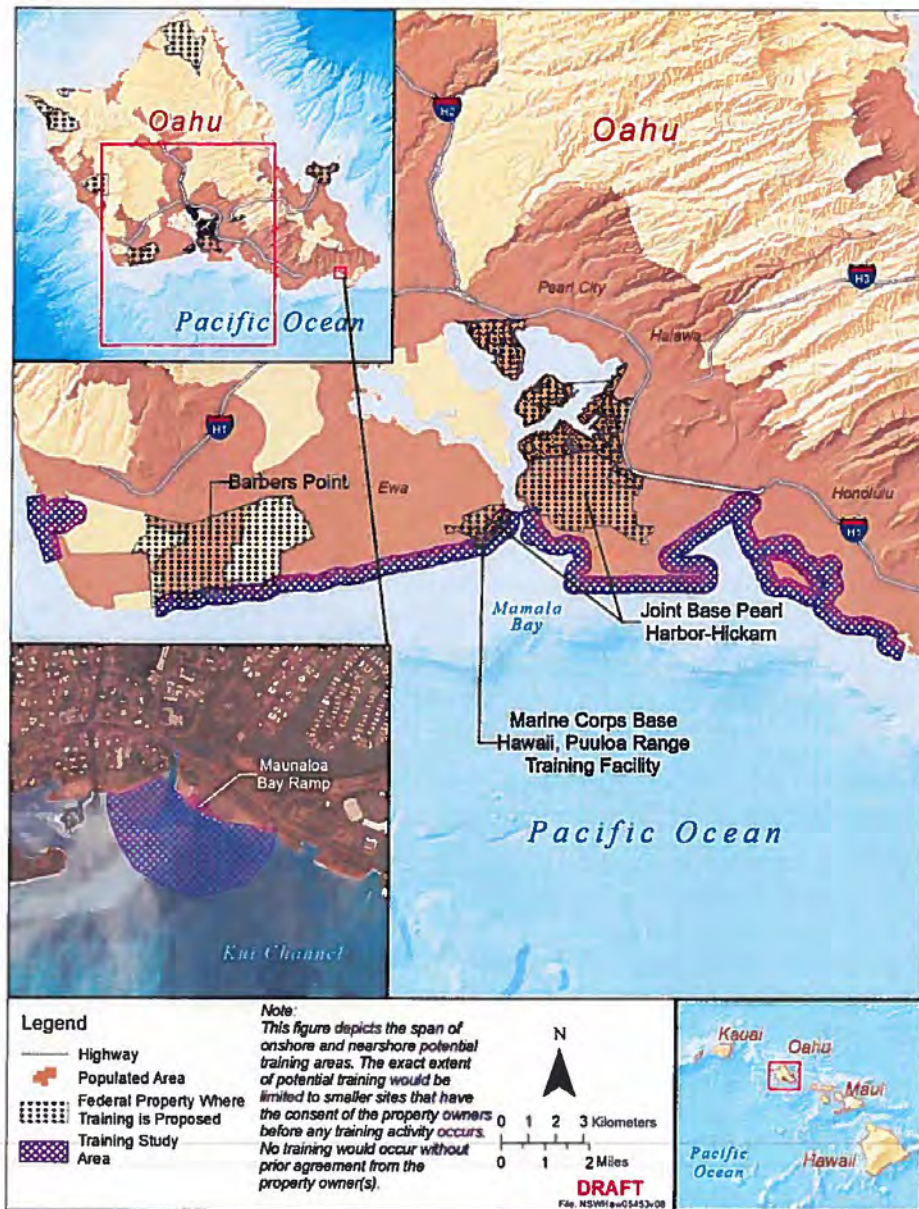


Figure 6: Oahu South Region Training Study Area

Attachment 2: Training Location Maps

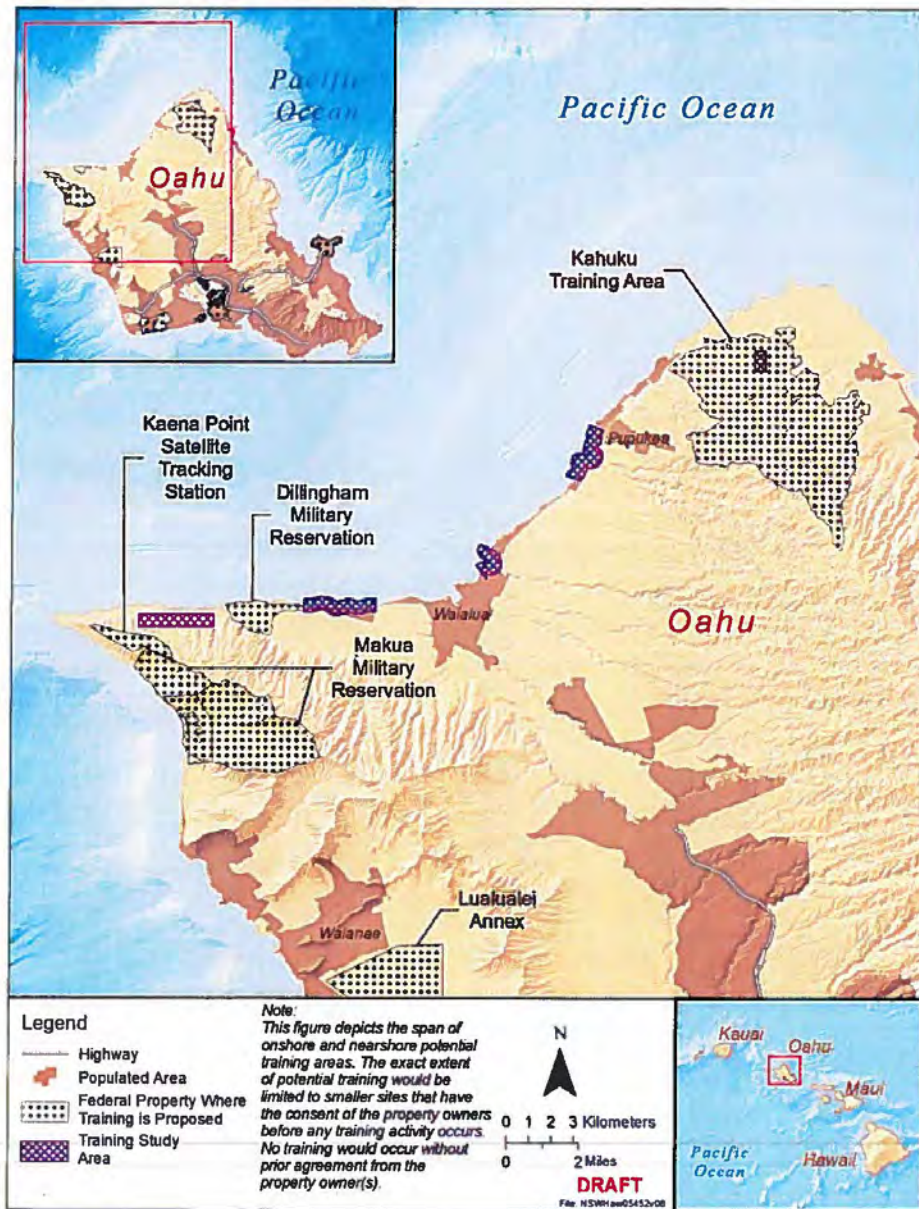


Figure 7: Oahu North Region Training Study Area

Attachment 2: Training Location Maps

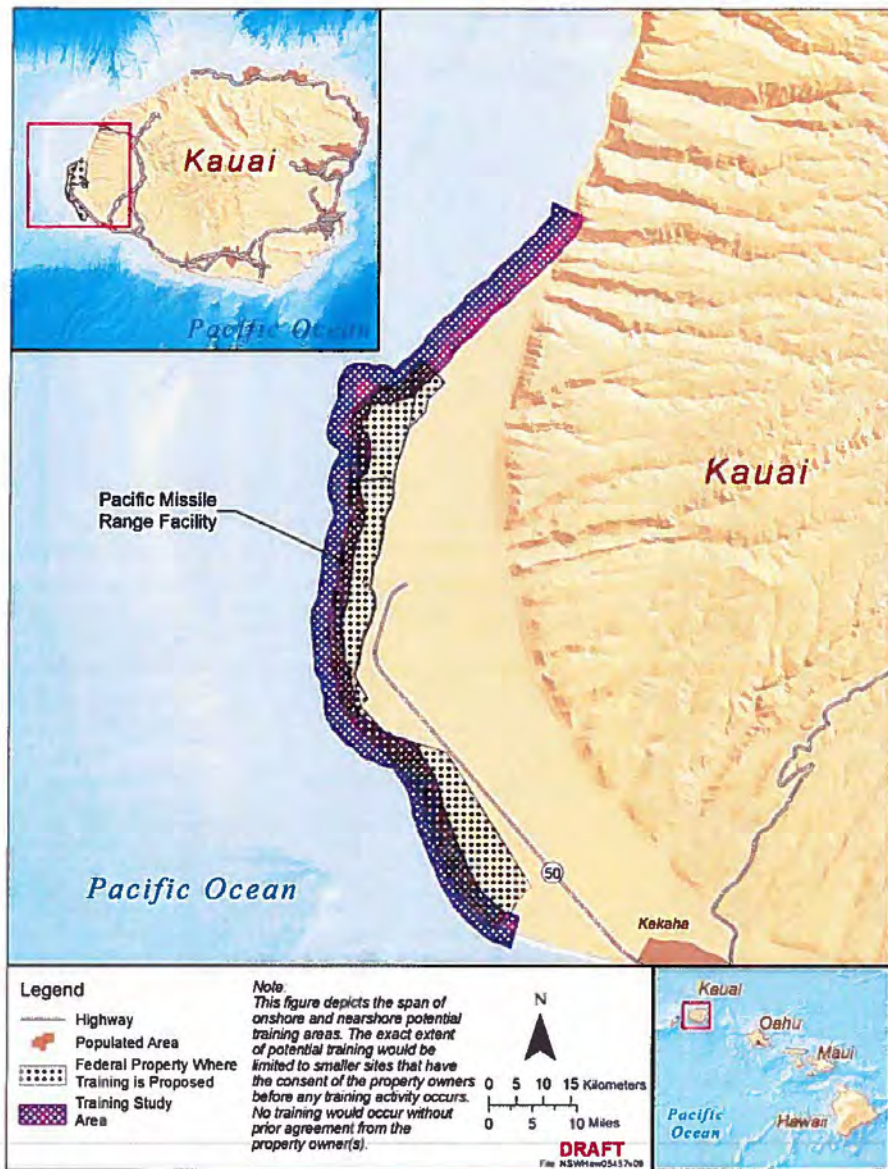


Figure 8: Kauai Training Study Area

Attachment 2: Training Location Maps

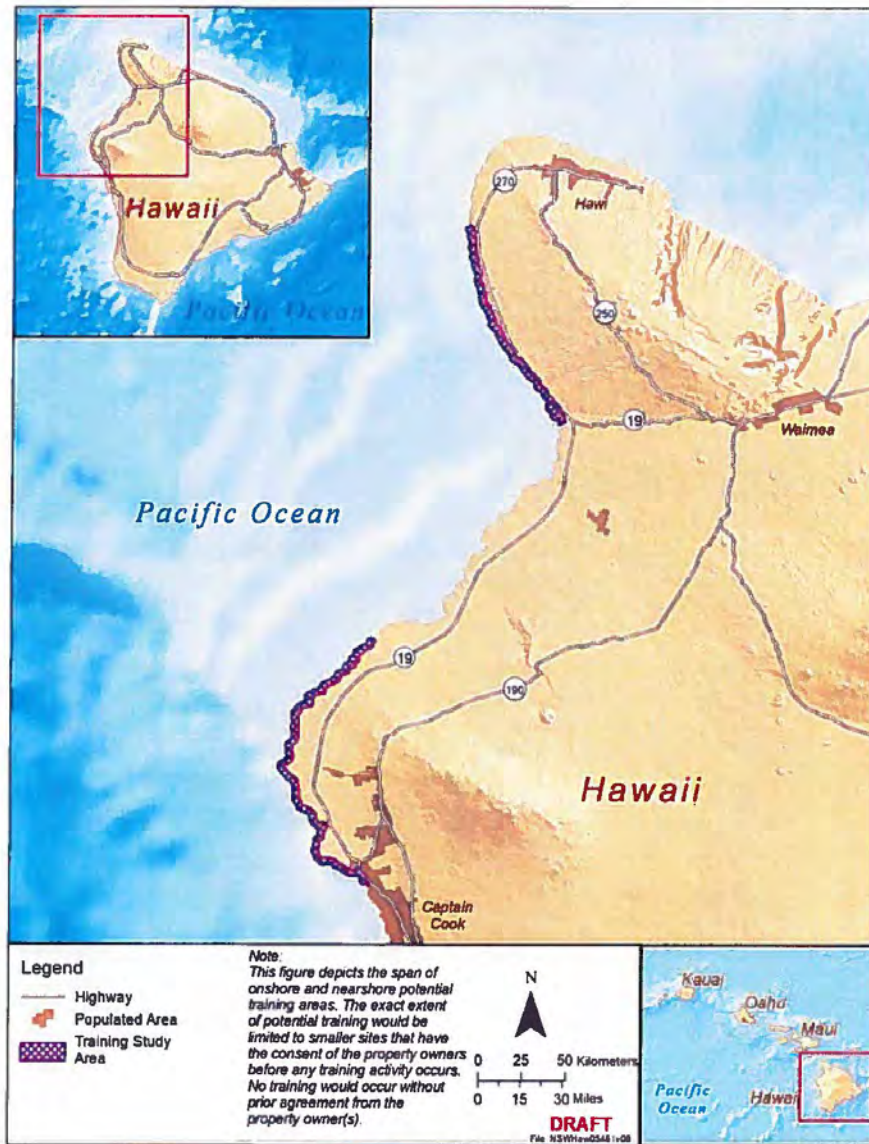


Figure 9: Island of Hawaii Training Study Area

A.1.2 USFWS Response to Navy's Request for Species List (7Mar18)



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850

In Reply Refer To:
01EPIF00-2018-SL-0133

MAR 07 2018

R.D. Hayes
Captain, CED, U.S. Navy
Regional Engineer
Navy Region Hawaii
850 Ticonderoga St., Ste. 110
JBPHH, Hawaii 96860-5101

Subject: Request for Species List and Critical Habitat for the Proposed Naval Special Warfare Command Training Activities on the Islands of Kauai, Oahu, and Hawaii

Dear Captain Hayes:

The U.S. Fish and Wildlife Service (Service) received your letter on January 10, 2018, requesting information regarding the presence of federally listed and proposed endangered or threatened species or critical habitat within the potential training areas of the U.S. Naval Special Warfare Command's proposed small unit intermediate and advanced land, air, and maritime training activities. The proposed training activities would occur at selected locations, including federal, State, and private property pending approvals through land-use and real estate agreements. The letter requested concurrence on a list of threatened and endangered species and critical habitat developed by Navy Region Hawaii for the preparation of an environmental assessment (EA) and a biological evaluation (BE) of the EA's preferred alternative.

On January 26, 2018, Naval Facilities Engineering Command, Pacific (NAVFAC PAC) staff provided ArcGIS map files of the potential training areas to the Service to assist in our response. The proposed action area in the map files limited the scope of the proposed training activities to areas on the islands of Kauai, Oahu, and Hawaii.

We offer the following comments for your consideration. Our comments are provided under the authorities of the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*), as amended (ESA); Fish and Wildlife Coordination Act of 1934 (16 U.S.C. 661 *et seq.*; 48 Stat. 401); and Migratory Bird Treaty Act of 1918 (MBTA) (16 U.S.C. 703-712), among others.

We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawai'i Biodiversity and Mapping Program. Enclosure 1 lists the federally listed species that may occur or transit through the vicinity of the potential training areas.

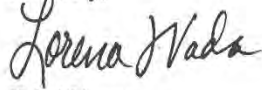
Captain R.D. Hayes

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Enclosure 2 identifies federally designated critical habitat that is within the vicinity of the potential training areas.

We hope this information assists you in your planning effort and aides in the conservation of listed species. If you would like to request additional information or have questions regarding these comments, please contact James Kwon, Fish and Wildlife Biologist (phone: 808-792-9400, email: james_kwon@fws.gov). When referring to this project, please include this reference number: 01EPIF00-2018-SL-0133.

Sincerely,



~~for~~ Kristi Young
Deputy Field Supervisor
Programmatic Division

Enclosures

Enclosure 1. Species List for the Proposed Naval Special Warfare Command Training Activities on the Islands of Kauai, Oahu, and Hawaii. Species listed were identified using the information provided in the Navy’s letter and ArcGIS Files, pertinent information in our files, including data compiled by the Hawai’i Biodiversity and Mapping Program. **Islands** and **Potential Training Area Region** listed indicate the areas where the species may occur or transit through the vicinity of the potential training areas.

<i>Scientific Name</i>	Common Name	Federal Status	Island(s)	Potential Training Area Region(s)
Mammals				
<i>Lasiurus cinereus semotus</i>	Hawaiian hoary bat	Endangered	Hawaii Kauai Oahu	All Kauai All
Reptiles				
<i>Chelonia mydas</i>	Green sea turtle Central North Pacific DPS	Threatened	Hawaii Kauai Oahu	Kona, Kohala Kauai Oahu North Oahu South Oahu West Oahu Windward
<i>Erectmochelys imbricata</i>	Hawksbill sea turtle	Endangered	Hawaii Kauai Oahu	Not in TAs Not in TAs Oahu Windward
<i>Lepidochelys olivacea</i>	Olive ridley sea turtle	Endangered	Oahu	Oahu Windward
Birds				
<i>Anas wyvilliana</i>	Hawaiian duck	Endangered	Kauai Oahu	All All
<i>Branta sandvicensis</i>	Hawaiian goose	Endangered	Hawaii Kauai Oahu	Kohala, PTA Kauai Oahu North Oahu West
<i>Fulica americana alai</i>	Hawaiian coot	Endangered	Hawaii Kauai Oahu	Kona Kauai Oahu Pearl Harbor Oahu North Oahu West Oahu Windward
<i>Gallinula galeata sandvicensis</i>	Hawaiian gallinule	Endangered	Kauai Oahu	Kauai Oahu Pearl Harbor Oahu North Oahu West Oahu Windward

<i>Scientific Name</i>	Common Name	Federal Status	Island(s)	Potential Training Area Region(s)
<i>Himantopus mexicanus knudseni</i>	Hawaiian stilt	Endangered	Hawaii Kauai Oahu	Kona Kauai Oahu North Oahu South Oahu Pearl Harbor Oahu West Oahu Windward
<i>Loxioides bailleui</i>	Palila	Endangered	Hawaii	PTA
<i>Oceanodroma castro</i>	Band-rumped storm-petrel	Endangered	Hawaii Kauai Oahu	PTA Kauai Historic
<i>Pterodroma sandwichensis</i>	Hawaiian petrel	Endangered	Hawaii Kauai	PTA Kauai
<i>Puffinus auricularis newelli</i>	Newell's shearwater	Threatened	Hawaii Kauai Oahu	Hawaii Kauai
Insects				
<i>Hylaeus anthracinus</i>	Yellow-faced bee	Endangered	Hawaii Oahu	Kona Oahu Oahu Windward
<i>H. assimulans</i>	Yellow-faced bee	Endangered	Oahu	Historic
<i>H. kuakea</i>	Yellow-faced bee	Endangered	Oahu	
<i>H. longiceps</i>	Yellow-faced bee	Endangered	Oahu	
<i>H. mana</i>	Yellow-faced bee	Endangered	Oahu	
<i>Megalagrion xanthomelas</i>	Orangeblack damselfly	Endangered	Hawaii Kauai Oahu	Kona Historic Oahu Pearl Harbor Oahu West Oahu Windward
Crustaceans				
<i>Procaris hawaiiiana</i>	Anchialine pool shrimp	Endangered	Hawaii	Kona
Plants				
<i>Abutilon menziesii</i>	Ko'oloa'ula	Endangered	Oahu	Oahu West
<i>Achyranthes splendens var. rotundata</i>	'Ewa hinahina	Endangered	Oahu	Oahu South Oahu South Barbers Point Oahu West
<i>Bidens amplexans</i>	Ko'oko'olau	Endangered	Oahu	Oahu West
<i>Bidens micrantha subsp. ctenophylla</i>	Ko'oko'olau	Endangered	Hawaii	Hawaii
<i>Chamaesyce skottsbergii var. skottsbergii</i>	'Akoko	Endangered	Oahu	Oahu South Barbers Point
<i>Cyperus trachysanthos</i>	Pu'uka'a	Endangered	Oahu	Oahu Windward

<i>Scientific Name</i>	<i>Common Name</i>	<i>Federal Status</i>	<i>Island(s)</i>	<i>Potential Training Area Region(s)</i>
<i>Euphorbia (Chamaesyce) celastroides var. kaenana</i>	'Akoko	Endangered	Oahu	Oahu West
<i>Hibiscus brackenridgei subsp. mokuleianus</i>	Mao hau hele	Endangered	Oahu	Oahu West
<i>Kadua (Hedyotis) st.-johnii</i>	No common name	Endangered	Kauai	Kauai
<i>Lepidium arbuscula</i>	'Anaunau	Endangered	Oahu	Oahu West
<i>Lipochaeta lobata subsp. leptophylla</i>	Nehe	Endangered	Oahu	Oahu West
<i>Marsilea villosa</i>	'Ihi 'ihi	Endangered	Oahu	Oahu West
<i>Melanthera tenuifolia</i>	Nehe	Endangered	Oahu	Oahu West
<i>Panicum niihauense</i>	Lau 'ehu	Endangered	Kauai	Kauai
<i>Schiedea apokremnos</i>	Ma 'oli 'oli	Endangered	Kauai	Kauai
<i>Sesbania tomentosa</i>	'Ohai	Endangered	Hawaii Kauai Oahu	Kona Kauai Oahu Windward Oahu West
<i>Silene hawaiiensis</i>	No common name	Threatened	Hawaii	PTA
<i>Spermolepis hawaiiensis</i>	No common name	Endangered	Oahu	Oahu West
<i>Wilkesia hobbdi</i>	Iliau, dwarf	Endangered	Kauai	Kauai

Enclosure 2. Critical Habitat (CH) within potential areas for the Naval Special Warfare Command Training Activities on the Islands of Kauai, Oahu, and Hawaii. CH units listed were identified using the information provided in the Navy’s letter and ArcGIS Files, and the Service’s final CH designations. **Potential Training Area Region(s)** are identified for the potential training areas that occur within final CH designations.

Scientific Name	Critical Habitat Unit	Federal Register Citation	Island	Potential Training Area Region(s)
Birds				
<i>Loxioides bailleui</i>	Palila	42 FR 40685	Hawaii	PTA
Plants				
<i>Panicum niihauense</i>	14-Panicum niihauense-a 15-Panicum niihauense-b 16-Panicum niihauense-c 17-Panicum niihauense-d	68 FR 9116	Kauai	Kauai Kauai Kauai Kauai
<i>Sesbania tomentosa</i>	14-Sesbania tomentosa-b	68 FR 9116		
Oahu Ecosystem Units				
Multiple species	Coastal - Unit 01	77 FR 57647	Oahu	Oahu West Oahu North
Multiple species	Coastal - Unit 15	77 FR 57647	Oahu	Oahu South Oahu South Barbers Point
Multiple species	Lowland Dry - Unit 08	77 FR 57647	Oahu	Oahu South

A.1.3 Cover Letter for Email to USFWS Requesting ESA Section 7 Consultation for Proposed Naval Special Operations Training in Hawaii (19Nov18)

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5750
Ser N4/0661
19 NOV 2018

CERTIFIED NO: 7016 0910 0001 0891 9394

Dr. Mary Abrams
Field Supervisor
U.S. Fish and Wildlife Service
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, HI 96850

SUBJECT: ENDANGERED SPECIES ACT SECTION 7 INFORMAL CONSULTATION
FOR PROPOSED NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII

Dear Dr. Abrams:

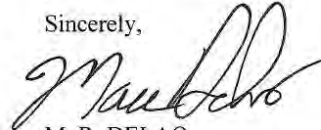
Pursuant to the Section 7(a)(2) of the Endangered Species Act (ESA), the Department of the Navy requests informal consultation to conduct small-unit intermediate and advanced land and maritime training activities for Naval Special Warfare Command (NSWC) personnel. The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii.

The Navy requests your review and concurrence of the enclosed Biological Evaluation. The Navy has determined the proposed training *may affect, but not likely to adversely affect (NLAA)* the following species and associated critical habitat: Lauehu (*Panicum niihauense*), Ohai (*Sesbania tomentosa*), Ko oloa ula (*Abutilon menziesii*), Pu uka a (*Cyperus trachysanthos*), Ihi ihi (*Marsilea villosa*), Hawaiian hoary bat (*Lasiurus cinereus semotus*), Green turtle (*Chelonia mydas*) Central North Pacific DPS, Hawksbill turtle (*Eretmochelys imbricata*), Olive ridley turtle (*Lepidochelys olivacea*), Band-rumped storm petrel (*Oceanodroma castro*) Hawaii DPS, Hawaiian common gallinule (*Gallinula galeata sandvicensis*), Hawaiian coot (*Fulica alai*), Hawaiian duck (*Anas wyvilliana*), Hawaiian goose (*Branta sandvicensis*), Hawaiian hawk (*Buteo solitarius*), Hawaiian petrel (*Pterodroma phaeopygia sandwichensis*), Hawaiian stilt (*Himantopus mexicanus knudseni*), Newell's Townsend's shearwater (*Puffinus auricularis newelli*), Yellow-faced bees (*Hylaeus anthracinus* and *Hylaeus longiceps*), and the Orangeblack Hawaiian damselfly (*Megalagrion xanthomelas*).

5750
Ser N4/ 0661
19 NOV 2018

The point of contact for this consultation is Julie Zimmerman of NAVFAC Pacific. She can be reached at (808) 472-1403 or email at Julie.Zimmerman@navy.mil.

Sincerely,



M. R. DELAO
Captain, CEC, U.S. Navy
Regional Engineer
By direction of the
Commander

Enclosure: 1. Biological Evaluation

A.1.4 USFWS Service Effects Determination Regarding ESA Informal Consultation for the Proposed Naval Special Operations Training in Hawaii (14Mar19)



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawaii 96850

In Reply Refer To: 01EPIF00-2019-I-0128

March 14, 2019

To: M.R. Delao, Captain, CEC, and Regional Engineer, U.S. Navy

From: Katherine Mullett, Acting Field Supervisor, Pacific Islands Fish and Wildlife Office

Subject: Informal Consultation for the Proposed Naval Special Operations Training in Hawaii

The U.S. Fish and Wildlife Service (Service) received your email, dated November 20, 2018, requesting our concurrence with your determination that the execution of small-unit intermediate and advanced land, maritime, and air-based training activities by Naval Special Warfare Command (NSWC) personnel may affect, but is not likely to adversely affect the following federally listed species and associated critical habitat:

Lau'ehu (*Panicum niuhauense*), 'Ohai (*Sesbania tomentosa*), Ko'oloa'ula (*Abutilon menziesii*), Pu'uka'a (*Cyperus trachysanthos*), 'Ihi'ihii (*Marsilea villosa*), Hawaiian hoary bat (*Lasiurus cinereus semotus*), Green turtle (*Chelonia mydas*) Central North Pacific distinct population segment (DPS), Hawksbill turtle (*Eretmochelys imbricata*), Olive ridley turtle (*Lepidochelys olivacea*), Band-rumped storm petrel (*Oceanodroma castro*) Hawaii DPS, Hawaiian common gallinule (*Gallinula galeata sandvicensis*), Hawaiian coot (*Fulica alai*), Hawaiian duck (*Anas wyvilliana*), Hawaiian goose (*Branta sandvicensis*), Hawaiian hawk (*Buteo solitarius*), Hawaiian petrel (*Pterodroma phaeopygia sandwichensis*), Hawaiian stilt (*Himantopus mexicanus knudseni*), Newell's Townsend's shearwater (*Puffinus auricularis newelli*), Yellow-faced bees (*Hylaeus anthracinus* and *Hylaeus longiceps*), and the Orangeblack Hawaiian damselfly (*Megalagrion xanthomelas*).

The findings and recommendations in this consultation are based on (1) your email received on November 20, 2018, and the accompanying Biological Evaluation, (2) early coordination and pre-consultation between the Service and NAVFAC on September 14, 2017 and October 11, 2017, and (3) other information available to us in our database and records, including data provided by the Hawaii Biodiversity and Mapping Program. A complete record of this consultation is on file in our office. This response is in accordance with section 7 of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*).

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Project Description

The NSWC proposes to conduct small-unit intermediate and advanced land, maritime, and air-based training activities for naval special operations personnel. The NSWC is the Navy's special operations force and the maritime component of the U.S. Special Operations Command (USSOCOM). The proposed training activities consist of training by naval special operations personnel with occasional integration of other USSOCOM entities, including U.S. Army Special Operations Command, Marine Corps Special Operations Command, Air Force Special Operations Command, and Joint Special Operations Command. The proposed training will take place in selected coastal nearshore waters and selected land-based areas throughout the State of Hawaii.

Land-based training will include personnel transiting over the beach on foot, simulating building clearance activities using simulated munitions, engaging in high angle climbing, and using observation techniques in a pre-arranged scenario (special reconnaissance operations). Training activities could occur as a single or separate event, or in many cases will be combined and performed sequentially to meet the training objectives. Proposed training will occur on both federal and non-federal properties within the State of Hawaii.

Water-based training activities are identified as diver/swimmer, insertion/extraction, unmanned underwater vehicle (UUV) training, and launch and recovery (the process of placing a vessel into the water and recovering it). In general, water-based training activities will include trainees, a training supervisor, and safety support personnel for the submersible craft or watercraft operation phases of the event.

Air-based training activities include using drop zones, helicopter landing zones, or authorized airspace, including restricted areas and warning areas, or in accordance with valid Federal Aviation Administration (FAA) Certificate of Authorization. Aircraft participating in air-based training events could include AC-130, C-17, helicopters, MV-22, or utilizing small unmanned aircraft systems (UAS). Routine mowing of landing zones will continue for the proposed training activities at Joint Base Pearl Harbor Hickam and Lualualei Annex. Some minor vegetation removal will be required on the Waipio peninsula landing zone to facilitate air based training activities.

Species Descriptions

Plants

Lau'ehu

Lau'ehu, a federally endangered perennial bunchgrass, occurs along dry coastal habitats in calcareous sand dunes and rocky knolls. The last known population is located on State owned land at Polihale State Park. Critical habitat for Lau'ehu is designated at Polihale State Park and at the Pacific Missile Range Facility in Kauai.

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'Ohai

'Ohai is a federally endangered low, spreading shrub or small tree that can extend up to 45' in diameter along coastal environments and dry forests. It is found mostly on calcareous beaches and sand dunes. Current populations are on Oahu, Molokai, Maui, Kauai, Kahoolawe, Hawaii, Nihoa, and Necker. Critical habitat for 'Ohai is designated on Kauai at Polihale State Park.

Ko'oloa'ula

Ko'oloa'ula is an endemic endangered Hawaiian spreading shrub that grows from 6 to 10 feet tall and about as wide. The branches are covered with dense hairs and appear velvety. The heart-shaped, silvery leaves have toothed edges and vary in length from 1 to 4 inches. It is found in dry forests at elevations of 650 to 1700 feet on Lanai, East Maui, and the island of Hawaii. There is a population on Oahu as well, but it is not known if it is native to that island.

Pu'uka'a

Pu'uka'a is a federally endangered perennial sedge with densely tufted culms which are tall, sticky, and leafy at the base. It is generally found in wet sites like mud flats, wet soils, or seeps on coastal cliffs or talus slopes. Pu'uka'a is found only on Oahu and Kauai and is found at the Lualualei Annex.

'Ihi'ihi

'Ihi'ihi is a tiny, endemic, endangered fern found only in dry lowland areas of Oahu and Molokai, typically in shallow, ephemeral ponds where the fronds appear to float on the surface. Critical habitat for 'Ihi'ihi was designated at the U.S. Navy's Lualualei Annex, however, this designation was removed in 2012.

To avoid and minimize potential project impacts to the endangered Hawaiian plants, the following measures will be incorporated as part of the project description.

Navy special operations (NSO) training activities on Federal property will be in compliance with installation Integrated Natural Resource Management Plans (INRMP) and sensitive biological resources will be identified and avoided to the maximum extent practicable. Site surveys prior to each training event will be conducted by qualified Department of Navy (DON) biologists to ensure no listed species are present. Land use and real estate agreements will identify sensitive biological resources within state parks and other non-federal properties and the identified areas will be avoided. Sensitive biological resources and species will be identified prior to training and avoided through training SOPs or site selection processes. Because the goal of training is for the trainees to be in the field undetected, the environment will be minimally disturbed and materials (e.g., gear and trash) will stay with or be removed by the trainees. In addition, identical travel routes will rarely be used, and the level of foot traffic associated with each group will not wear paths in the training study area.

Mammal

Hawaiian hoary bat

The Hawaiian hoary bat, Hawaii's only native terrestrial mammal, roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs

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when they forage. Hawaiian hoary bats forage for insects from 3 feet to greater than 500 feet above the ground. No critical habitat for the Hawaiian hoary bat has been designated within this project area.

To avoid and minimize potential project impacts to the endangered Hawaiian hoary bat, the following measures will be incorporated as part of the project description.

Different travel routes will be used for multiple training events to avoid repeatedly flushing bats from an area. Training support vehicles will remain on established roads and not disturb roosting bats. To avoid aerial collisions with bats, NSO personnel will only utilize UAS at sites where routine military flights occur, allowing for habituation of avoidance behavior by bats. Vegetation removal of larger trees (<15 feet in height) will not occur during the bat's pupping season from June 1 through September 15.

Reptiles

Green Sea Turtle, Central North Pacific Distinct Population Segment

The threatened green sea turtle is the most abundant and common sea turtle in Hawaiian waters and is present year round. The top shell (carapace) is smooth with shades of black, gray, green, brown, and yellow; their bottom shell (plastron) is yellowish white. Green turtles are the largest of all the hard-shelled sea turtles, but have a comparatively small head. Adults migrate from foraging grounds throughout the Hawaiian Islands to breeding grounds. Males appear to migrate every year, arriving ahead of the females. Females return to the same beaches where they were born every 2-4 years to lay eggs, generally in the summer months. Nesting occurs from late April through September with a peak in June-July.

Hawksbill Turtle

The federally endangered hawksbill is a small to medium-sized marine turtle having an elongated oval shell with overlapping scutes on the carapace, a relatively small head with a distinctive hawk-like beak, and flippers with two claws. General coloration is brown with numerous splashes of yellow, orange, or reddish-brown on the carapace. The plastron is yellowish with black spots on the intergular and postanal scutes. Juveniles are black or very dark brown with light brown or yellow coloration on the edge of the shell, limbs, and raised ridges of the carapace. Hawksbills frequent rocky areas, coral reefs, shallow coastal areas, lagoons or oceanic islands, and narrow creeks and passes. They are seldom seen in water deeper than 65 feet. Hatchlings are often found floating in masses of sea plants, and nesting may occur on almost any undisturbed deep-sand beach in the tropics. Adult females are able to climb over reefs and rocks to nest in beach vegetation.

Olive Ridley Turtle

The federally endangered olive ridley turtle was named for the olive color of its heart-shaped shell and is one of the smallest of the sea turtles, with adults reaching 2 to 2.5 feet in length and weighing 80 to 110 pounds. The species may be identified by the uniquely high and variable numbers of vertebral and costal scutes. The olive ridley's diet includes crabs, shrimp, lobsters, jellyfish, mollusks, and tunicates. The olive ridley occurs worldwide in tropical and warm temperate ocean waters and appears to be more of an open ocean inhabitant than its congener,

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the Kemp's ridley, which primarily inhabits shallow nearshore coastal waters. The majority of nesting occurs along continental margins and rarely on the Hawaiian Islands.

To avoid and minimize potential project impacts to listed sea turtles encountered in terrestrial settings, the following measures will be incorporated as part of the project description.

For training sites on Oahu (e.g. Marine Corps Base Hawaii (MCBH), Pu'uloa Shoreline et al.), qualified DON biologists will continue to conduct weekly turtle surveys, as called for in existing INRMPs and SOPs. During the nesting season (May 15-Sept 30), monitoring for turtles will be conducted 2-3 times per week at MCBH. Discovered nests will continue to be monitored 2-3 times per week, and every other day or daily within 2 weeks of egg hatching.

For beach crossings at the Pacific Missile Range Facility (PMRF) from May-July, the PMRF team of two, full-time field biologists will continue to survey the Nohili Dunes area for turtle nests once weekly and for everything south of Nohili Dunes, twice weekly. Nohili Ditch, and the area known as Diver's Landing, are monitored for turtles basking year-round and twice weekly by biologists.

Finally, for all training sites across the Hawaiian Islands, the following procedures will be in place to minimize risks to sea turtle nests and hatchlings:

- 1) prior to conducting a landing exercise, an inspection and survey for turtles and nest sites will occur within one hour of the training;
- 2) sea turtle nest sites will be marked and no trespassing within 50 feet of the nests will be enforced; and
- 3) if sea turtles are found on the beach, the landing activity will be delayed until the animals have left the area or the landing will be relocated.

Birds

Band-rumped storm petrel

The federally endangered band-rumped storm petrel, a small seabird, is a member of the family Hydrobatidae and is found in several areas of the subtropical Pacific and Atlantic Oceans. In Hawaii, band-rumped storm petrels are known to nest in remote cliff locations on Kauai and Lehua Island, in steep open to vegetated cliffs, and in little vegetated, high-elevation lava fields on the island of Hawaii.

Hawaiian common gallinule

The federally endangered Hawaiian common gallinule is recognized as a distinct subspecies of waterbird, differing from other species in having a red blush on the front and sides of the tarsus. The Hawaiian common gallinule superficially resembles the related Hawaiian coot, but they are noticeably smaller, possess a red shield over their red and yellow bill, and have a white flank stripe. The Hawaiian common gallinule was historically found on all of the main Hawaiian Islands except Lanai (presumably due to the lack of wetlands there) and probably Niihau. Currently, Hawaiian common gallinules are found only on the islands of Kauai and Oahu with each island roughly supporting half of the total population.

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Hawaiian coot

The federally endangered Hawaiian coot is smaller in body size than the American coot, and the bulbous frontal shield above the bill is distinctly larger than that of the American coot and is usually completely white though occasionally marked with red. Adult Hawaiian coots are dark, slate-gray in color, with white undertail feathers. Male and female Hawaiian coots are similar in color. Hawaiian coots have large feet with lobed toes, unlike the webbed feet of ducks.

Hawaiian coots historically occurred on all of the main Hawaiian Islands except Lanai and Kahoolawe, which lacked suitable wetland habitat. Hawaiian coots have always been most numerous on Oahu, Maui, and Kauai. They were likely once fairly common in large natural marshes and taro patches.

Hawaiian duck

The federally endangered Hawaiian duck is a small drab-brown duck. Both sexes are mottled brown and similar in appearance to a female mallard. Adult males are dark brown, variably spotted and mottled, with distinctive dark brown chevrons on the breast, flank, and back feathers, and an olive bill. Hawaiian ducks were known historically from all of the main Hawaiian Islands except Lanai and Kahoolawe. There are no population estimates prior to 1940, but in the 1800s they were fairly common in natural and farmed habitats. The Hawaiian duck historically used a wide variety of natural wetland habitats for nesting and feeding, including freshwater marshes, flooded grasslands, coastal ponds, streams, montane pools, and forest swamplands at elevations ranging from sea level to 10,000 feet.

Hawaiian goose (nene)

The federally endangered Hawaiian goose, an endemic species and the state bird of Hawaii, has a black head and bill, yellow-buff cheeks, a buff neck with dark furrows, and partially webbed black feet. Fossil records show that the nene was present on all the main Hawaiian Islands in abundant numbers but declined or disappeared due to habitat alteration, predation, and introduced animals. The decline in numbers was accelerated during the period of 1850 to 1900 due to aggressive hunting of the birds and collecting of their eggs. Nene currently use shrublands, grasslands, sparsely vegetated lava flows, and human-altered habitats ranging from coastal to alpine environments. Nene are currently proposed to be downlisted from endangered to threatened, though this official status revision has not been finalized as of the writing of this document.

Hawaiian hawk

The federally endangered Hawaiian hawk is a small, broad-winged hawk endemic to the Hawaiian Islands. Once known on Oahu, Maui, Molokai, and Kauai, it is now restricted solely to the island of Hawaii. Breeding vegetation types include lowland exotic forests and agricultural lands, mid-elevation pastureland, and upper-elevation native forests. The Hawaiian hawk was listed as endangered in 1967, but is thought to have a stable population, and has been proposed as a candidate for downlisting and delisting from the Endangered Species Act several times in the last 20 years.

Hawaiian petrel

The federally endangered Hawaiian petrel is a large, nocturnal petrel endemic to Hawaii, where it nests on the islands of Maui, Hawaii, Lanai, and Kauai, and possibly on Molokai, the sea

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stacks off of Kahoolawe, and Lehua Islet. Subfossil evidence indicates that prior to the arrival of Polynesians, Hawaiian petrels were common throughout the main Hawaiian Islands. Similar to the Newell's shearwater, the Hawaiian petrel's remaining colonies occur predominantly in steep and/or remote areas, last bastions to which they have been driven by habitat loss and predation by introduced species.

Hawaiian stilt

The federally endangered Hawaiian stilt is a slender wading bird, black above except for the forehead and white below with distinctive long, pink legs. The Hawaiian stilt differs from North American black-necked stilts by having black coloration extending lower on the forehead as well as around the sides of the neck, and by having a longer bill, tarsus, and tail. Hawaiian stilts were historically known from all of the major islands except Lanai and Kahoolawe. Hawaiian stilts are currently found on all of the main Hawaiian Islands except Kahoolawe.

Newell's Townsend's Shearwater

The federally threatened Newell's shearwater is a subspecies endemic to the Hawaiian Islands, where it is known to nest on Kauai, Molokai, and Hawaii. Newell's shearwaters may nest on Maui and in very small numbers on Oahu and Lehua Islet near Niihau. Newell's shearwater numbers are greatest on Kauai, which may harbor as much as 75 percent of the world's population. The fact that known Newell's shearwater colonies are in remote montane locations and/or occur on slopes greater than 65 degrees suggests that predation by nonnative mammals has constrained this seabird's breeding habitat. Some colonies on Kauai are located in vertical cliff faces, where birds presumably are nesting in rock crevices rather than burrows.

To avoid and minimize potential project impacts to listed birds, the following measures will be incorporated as part of the project description.

For training sites at Bellows Air Force Station, MCBH, and PMRF, where listed Hawaiian waterbirds are found, the DON will continue to prohibit training activities within 3,000 feet of known locations of listed bird species. Further, on all sites, night training will use minimal or no lighting to avoid disturbance to nocturnal seabirds. Training activities will not be conducted in any sensitive areas listed in facility INRMPs and described by installation personnel. For activities on non-federal properties, known sensitive areas for birds will be identified in discussion with landowners and their representatives and purposefully avoided.

For known seabird and wetland nesting areas such as those found at MCBH and on the Waipio Peninsula on Oahu, all aircraft operations and UAS will not take place within 500 feet above ground level (AGL) and 1000 feet laterally of designated areas. Further restrictions on the use of UAS include limiting their use solely to federally owned properties and only on areas with regular military flights where bats and birds should be conditioned to avoidance behavior.

Insects

Yellow-Faced Bees

Bees in the genus *Hylaeus*, which includes the two species covered by this consultation, are commonly known as yellow-faced bees or masked bees for their yellow-to-white facial

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markings. All *Hylaeus* bees roughly resemble small wasps in appearance; however, *Hylaeus* bees have plumose (branched) hairs on the body that are longest on the sides of the thorax, which readily distinguish them from wasps. *Hylaeus* bees were once commonly distributed across the main Hawaiian Islands, save for Kauai and Niihau, but are now extremely limited in their distribution to areas of lowland mesic ecosystems including grasslands, shrublands, and forests that are much reduced in occurrence due to a variety of factors.

Orangeblack Hawaiian Damsselfy

The orangeblack Hawaiian damsselfy was once Hawaii's most abundant damsselfy species likely because of its ability to use a variety of aquatic habitats for breeding sites. Historically, the orangeblack Hawaiian damsselfy probably occurred on all of the main Hawaiian Islands (except Kahoolawe) in suitable aquatic habitat within the anchialine pool, coastal, lowland dry, and lowland mesic ecosystems. Currently, the orangeblack Hawaiian damsselfy occurs on the islands of Oahu, Molokai, Lanai, Maui, and Hawaii.

To avoid and minimize potential project impacts to listed insects, the following measures will be incorporated as part of the project description.

Training access and activities will avoid known occupied habitat of listed insects. Additionally, the use of vehicles in known *Hylaeus* and orangeblack damsselfy habitat will be prohibited and restricted to existing designated roads.

Effects Analysis

Plants

The movement of NSO trainees through habitats which may contain the described federally-listed plants poses the potential for trainees to step on and crush plants as they move through an area. However, as the goal of training is for the trainees to be in the field undetected, listed plants should be completely avoided or minimally disturbed, and materials (e.g., gear and trash) will not be left behind. In addition, identical travel routes will not be used by the NSO forces, reducing the likelihood of repeated disturbance to an individual plant. Training activities on federal property will be in compliance with installation INRMPs, and sensitive biological resources will be identified and avoided to the maximum extent practicable. Site surveys will be conducted prior to each training event by qualified DON biologists to ensure no listed species are present. Land use and real estate agreements will also identify sensitive biological resources within state parks and other non-federal properties, and those areas will be avoided in accordance with the agreements. Finally, training activities that may occur on state parks will be by agreement with the Hawaii Department of Land and Natural Resources (DLNR) State Parks Division. Training activities will be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources. Because the DON has agreed to implement the above detection and avoidance measures into their action, the effect on listed plant species should be negligible. As the effects are negligible and discountable, they are unlikely to adversely affect listed plant species in the training area.

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Mammals

Since the proposed project will avoid disturbance, removal, or trimming of potential roost trees during the bat pupping season (June 1-September 15), it is unlikely that the proposed project will impact Hawaiian hoary bats, and therefore the effects are discountable. Further, based on the avoidance of low altitude military flights save for those occurring at regular military flight areas, it is unlikely that the project will impact bats, and therefore the effects are discountable. Because the effects from the proposed project are discountable, it is not likely that the proposed project will adversely affect the Hawaiian hoary bat.

Reptiles

Navy special operations personnel performing beach and nearshore area crossings of the training study area could potentially impact nesting or resting sea turtles. Sea turtle presence in the training study area is common and known to occur in the same areas where training activities are proposed. The NSWC has agreed to perform sea turtle surveys according to the regimens described above, and will avoid and delay training exercises until beaches are clear of turtles. They will therefore avoid disturbing nesting and basking sea turtles in near shore environments. Further, as minimal to no lighting will be used during training activities, disturbance to nesting females and emergent hatchlings from artificial lighting should also be largely avoided. Consequently, impacts to sea turtles on land are expected to be minimal, short term, and recoverable based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, (4) brief duration of the activities, and (5) survey, marking, avoidance, and delay-based SOPs designed to minimize or avoid impacts on sea turtles on nesting beaches. For these reasons, long-term consequences to individuals or populations of sea turtles in the terrestrial environment are not expected to result from the activities under the proposed action. Proposed in-water activities that involve vessels, personnel, and parachute operations in the water that could impact sea turtles present in the training study area are discussed in the section 7 consultation with NMFS.

Birds

Components of the proposed action have the potential to cause adverse effects to listed seabirds, waterbirds, and terrestrial birds of Hawaii. Nocturnal seabirds may be impacted by nighttime training exercises on shore and near shore environments. All birds may be potentially impacted by strikes from aircraft and UAS flights near sensitive and important habitats. Navy special operations personnel traversing beach and near-shore habitats may inadvertently flush nesting birds or crush occupied nests and eggs. Because of these potential impacts, NSWC has agreed to avoid and minimize the effect of their action with many different countermeasures, including the prohibition of training activities within 1,000 meters of posted signs marking the presence of rare and protected animal species or restoration projects. To mitigate the potential for nighttime disturbances to nocturnal seabirds, night training will use no or minimal lighting. Training activities will be consistent with training area restrictions defined in installation INRMPs, where training activities will either be limited or prohibited to avoid potential impacts to sensitive ecological resources. For activities that may occur on non-Federal properties, sensitive ecological resources will be defined in land use and real estate agreements. For example, training

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activities that may occur on state parks will be by agreement with the Hawaii DLNR State Parks Division. Training activities will be consistent with management objectives of individual parks, including prohibiting training in sensitive areas containing important natural and cultural resources.

In accordance with standard Bird/Animal Aircraft Strike Hazard measures for aircrew safety, and to avoid and minimize impacts to migratory birds and listed species, all aircraft activities will avoid all known seabird colonies and known important waterbird habitats such as those found at Joint Base Pearl Harbor Hickam, MCBH, PMRF, among others by at least 500 feet above ground level and 1,000 feet laterally. The avoidance of known important habitat should reduce the possibility of negative impacts to listed birds to a discountable level. Further, UAS operations will only occur on military installations on Oahu and Kauai within authorized air space, where routine military flights occur. Because the UAS flights will only occur on bases where regular flights are common, listed bird species should be already conditioned to avoid the areas, thereby reducing the likelihood of air strikes to a discountable level.

A final possible category of impacts to listed bird species is physical disturbance or destruction of nests by NSO personnel as they traverse shore and near shore areas. Trainees traversing beaches where bird nesting occurs have the potential to step on nests, crushing eggs or recently hatched chicks, or destroying nests, which may induce adult birds to abandon nests. However, the potential for physical disturbance or destruction of nests should be reduced or eliminated by compliance with the area and access constraints specified in installation INRMPs and communicated to operators by natural resource specialists, and training constraints specified in land use and real estate agreements for non-DoD properties. Compliance with location based constraints specified in INRMPs and other natural resource documents will prevent the use of sensitive bird nesting areas for training exercises and should reduce potential impacts to a wholly discountable or negligible level of effects.

Insects

Navy special operations trainees crossing nearshore, coastal strand habitats, or terminal still-water reaches of perennial streams have the potential to step on and crush nests and other habitat for *Hylaeus* bees and the orangeblack Hawaiian damselfly. As *Hylaeus* bees strongly depend on an intact community of native plants and are mostly absent from habitats dominated by non-native plant species, the destruction of native habitat for these species will be avoided. The potential for foot traffic during training activities through habitat and potential disturbance or destruction of nests is not likely to occur, as installation specific training constraints specified in INRMPs will be implemented. Finally, training constraints specified in land use and real estate agreements for non-DoD properties will preclude conduction of training in known sensitive habitats for listed insects. Consequently, potential impacts should be reduced to discountable or negligible effects levels.

Summary

Based on the above information, we concur that the proposed project may affect, but is not likely to adversely affect, the above described federally listed species and designated critical habitat.

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Unless the project description changes, or new information reveals that the proposed project may affect listed species in a manner or to an extent not considered, or a new species or critical habitat is designated that may be affected by the proposed action, no further action pursuant to section 7 of the ESA is necessary.

We thank you for your efforts to conserve listed species and native habitats. Please contact John Weber, Department of Defense Coordinator (phone: 808-792-9490, email: [John S. Weber@fws.gov](mailto:John_S_Weber@fws.gov)) should you have any questions pertaining to this response or require further guidance. When referring to this project, please include this reference number: 01EPIF00-2019-I-0128.

Sincerely,

**KATHERINE
MULLETT**

Digitally signed by KATHERINE
MULLETT
Date: 2019.03.14 11:24:32
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Katherine Mullett
Acting Field Supervisor
Pacific Islands Fish & Wildlife Office

A.1.5 USFWS Effects Determination Regarding a Supplemental ESA Section 7 Informal Consultation for the Proposed Naval Special Operations Training in Hawaii – Kaena Point Training Study Area (16Mar21)



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Pacific Islands Fish and Wildlife Office
 300 Ala Moana Boulevard, Suite 3-122
 Honolulu, Hawaii 96850



March 16, 2021

In Reply Refer to:
 01EPIF00-2019-I-0128-R001

Ms. Sherri Eng
 Director
 Regional Environmental Department
 Navy Region Hawaii
 850 Ticonderoga St., Suite 110
 JBPHH, Hawaii 96850-5101

Subject: Informal Consultation for Naval Special Operations Training in Hawaii

Dear Ms. Eng:

The U.S. Fish and Wildlife Service (Service) received your letter, dated November 30, 2020, in which the Navy requested consultation (TAILS Reference No. 01EPIF00-2019-I-00128) and our concurrence on your determination of “may affect, not likely to adversely affect” for the federally endangered *Bidens amplexans* in the Kaena Point training study area on Oahu. On March 14, 2019, the Service issued a letter of concurrence stating that the proposed Naval Special Operations (NSO) training may affect, but is not likely to adversely affect 22 listed plant and animal species and critical habitat. Subsequent to the Service’s March 2019 letter of concurrence, the Navy learned that the endangered plant, *B. amplexans*, occurs within the Kaena Point training study area. There is no critical habitat within the Kaena Point training study area. Your consultation request was received by the Service on December 1, 2020.

Project Description

The Navy proposes to conduct special reconnaissance training activities within the Kaena Point study area (action area)(Figure 1). The action area includes lands managed by the U.S. Air Force’s Kaena Point Satellite Tracking Station (KPSTS) and adjacent State lands. Training activities include hiking to designated observation points, using observation techniques, following procedures, and reporting back on scenarios involving role play with military instructors or support staff. As part of the training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. All vehicles will remain on established roadways and one emergency response vehicle will be used by support personnel. During a typical training event, there may be up to 20 trainees and up to 15 support personnel at a training site. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity.

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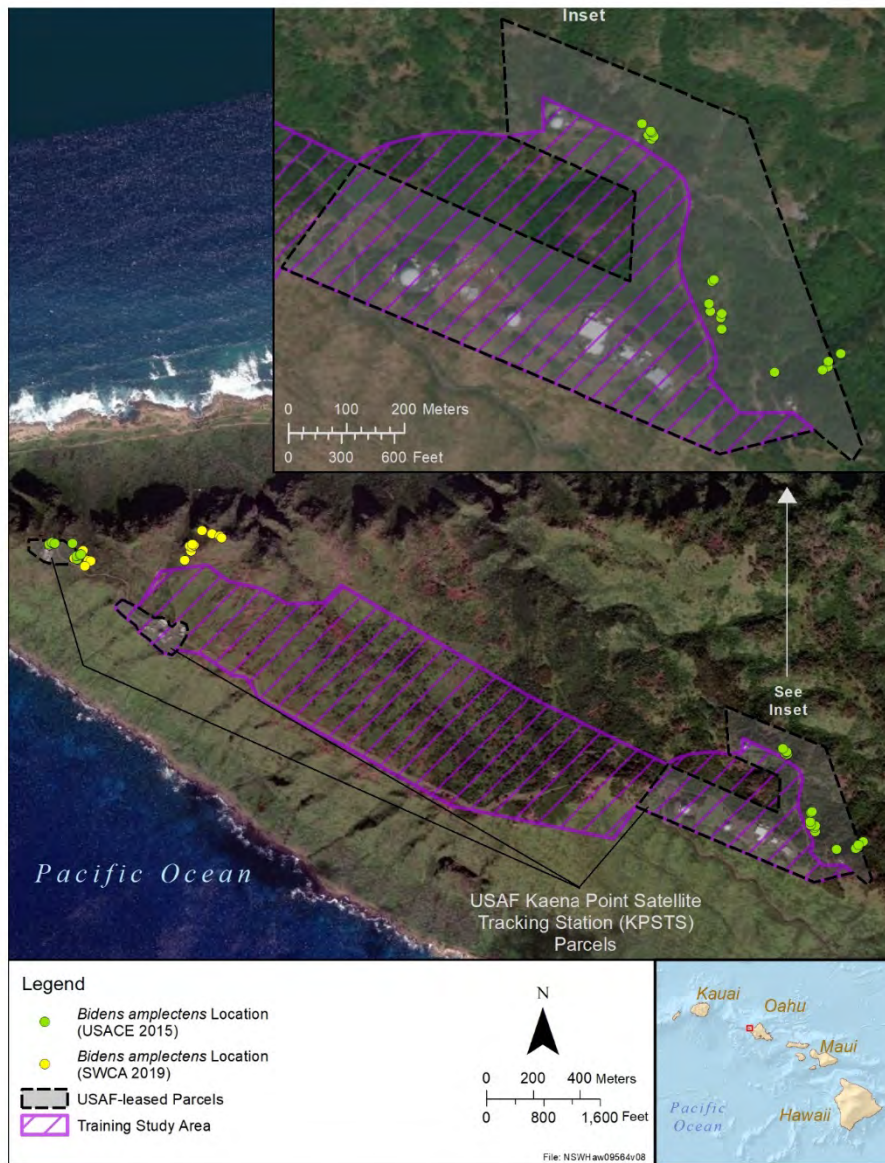


Figure 1. Action Area – Kaena Point Training Study Area. In the inset area, slopes and areas north of the road are designated as off-limits to training.

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The Navy will implement the following avoidance, minimization, and conservation measures to reduce project effects:

- Identify sensitive biological resources and listed species
 - NSO will utilize plans and sources such as but not limited to current site surveys, KPSTS Integrated Natural Resources Management Plan, and coordination with the KPSTS Natural Resources Manager and the Service to identify areas that may support *B. amplexans*.
- Designate areas off-limits to training to avoid impacts to *Bidens amplexans*
 - During training event planning, Standard Operating Procedures (SOP) or site selection processes will be used to exclude training in areas with *B. amplexans* or habitat where *B. amplexans* is most likely to occur.
 - No training activities will be conducted on steep or rocky cliffs where *B. amplexans* is likely to occur.
 - Areas off-limits to training will be indicated on a map and shared with training instructors and personnel.
- Conduct informational briefings about threatened and endangered species and off-limits areas
 - The Navy will provide informational briefings for all trainees on SOPs, Best Management Practices (BMPs), and avoidance, minimization, and conservation measures for threatened and endangered species.
 - Trainees will also receive safety briefings, have constant oversight by instructors, and Naval Special Warfare Command Public Affairs Officers or their representatives would be available to interact with the public should anyone approach an active training scenario.
- Implement the following SOPs and BMPs
 - Vehicles will remain on existing established roadways, and sound will be minimized during training to avoid detection.
 - To the maximum extent practical, NSO personnel will adhere to the site-specific procedures to reduce the transport, introduction, and establishment of potentially invasive species.
 - NSO support personnel will continually evaluate the training scenario and employ SOPs to ensure that training activities are isolated and remain safe.

Analysis of Effects

Bidens amplexans, is a perennial or facultative annual herb, in the sunflower family (Asteraceae). Listed as endangered in 2012, *B. amplexans* is currently known from about 10 populations totaling fewer than 500 individuals (USFWS 2019). Typical habitat of *B. amplexans* includes cliffs and talus slopes in lowland dry shrubland dominated by the indigenous plant species *Psydrax odorata* (alahe'e), *Myoporum sandwicense* (naio), and *Sida fallax* ('ilima) on the windward side of the Waianae mountains (Wagner et al. 1999, p. 271). Recent surveys documented over 200 individuals of *B. amplexans* within and in close proximity of the action area (USACE 2015, p. 13; SWCA 2019, p. 13). In particular, in the KPSTS Control Area, a significant number of individuals (120) were observed on the northern slopes in mixed nonnative forest (*Casuarina-Pinus*) near the Kuaokala Trail. As a facultative annual, the presence of

Ms. Sherri Eng

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seedlings during these surveys (conducted in 2014 and 2019) indicates that new plants could be found in areas of suitable habitat adjacent to observed plants within a year of surveys.

The action area overlaps with the occurrence of *B. amplexans*. However, avoidance of impacts to *B. amplexans* will result from implementing the conservation measure of making areas containing *B. amplexans* or steep, rocky slopes and cliff habitat, which support *B. amplexans*, off-limits to training activities. Due to this conservation measure, effects to *B. amplexans* are unlikely to occur due to avoidance. Because effects from the project are unlikely, they are discountable and therefore the proposed project is not likely to adversely affect *B. amplexans*.

Summary

In accordance with 50 CFR §402.13, the Service concurs with your determination that the proposed action may affect, but is not likely to adversely affect the endangered *Bidens amplexans*. Reinitiation of consultation is required and shall be requested by the Federal agency or by the Service, where discretionary Federal involvement or control over the action has been retained or is authorized by law and:

- 1) If new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered;
- 2) If the identified action is subsequently modified in a manner that causes an effect to the listed species that was not considered in the written concurrence; or,
- 3) If a new species is listed or critical habitat designated that may be affected by the identified action.

If any of these reinitiation requirements is triggered, we recommend you contact our office so that we may assist you in re-assessing project impacts.

We appreciate your efforts to conserve threatened and endangered species. If you have any questions concerning these recommendations please contact James Kwon, Fish and Wildlife Biologist (808-792-9443, james_kwon@fws.gov). When referring to this project, please include this reference number: 01EPIF00-2019-I-0128-R001.

Sincerely,

LORENA
WADA

Digitally signed by
LORENA WADA
Date: 2021.05.14
21:41:31 -10'00'

Lorena Wada
Acting Planning and Consultation Team
Manager

Ms. Sherri Eng

5

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A.2 NATIONAL MARINE FISHERIES SERVICE (NMFS) –ENDANGERED SPECIES ACT (ESA) AND MAGNUSON-STEVENSON FISHERY CONSERVATION AND MANAGEMENT ACT (MSA) CONSULTATIONS

A.2.1 Department of the Navy Request for Consultation under ESA Section 7 and the MSA (13Dec18)



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5750
Ser N4/0670
13 DEC 2018

Mr. Michael Tosatto
Pacific Islands Regional Office
National Marine Fisheries Service
1845 Wasp Blvd, Building 176
Honolulu, HI 96818

Dear Mr. Tosatto:

SUBJECT: EFFECTS OF NAVY SPECIAL WARFARE'S TRAINING ON ENDANGERED SPECIES AND ESSENTIAL FISH HABITAT IN THE MAIN HAWAIIAN ISLANDS

Pursuant to section 7(a)(2) of the Endangered Species Act of 1973 (ESA), as amended (16 USC § 1531 et seq.), the department of the Navy requests informal consultation with the National Marine Fisheries Service (NMFS) to conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel. The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii.

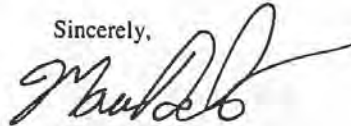
The Navy requests your review and concurrence of the enclosed Biological Evaluation. The Navy has determined the proposed training *may affect, but is not likely to adversely affect* (NLAA) the following species: Hawaiian monk seal (*Neomonachus schauinslandi*), Hawaiian Insular population of false killer whale (*Pseudorca crassidens*), hawksbill turtle (*Eretmochelys imbricata*), olive Ridley turtle (*Lepidochelys olivacea*), Central North Pacific DPS of the green sea turtle (*Chelonia mydas*), and giant manta ray (*Manta birostris*). One coral species (*Pocillopora meandrina*), proposed to be listed pursuant to Section 4 of the ESA, is not currently addressed in the enclosed documents. Please inform the Navy if there are other listed or proposed species in the project area that may be affected but were not considered.

Pursuant to the Magnuson-Stevens Fishery Conservation and Management Act (16 USC § 1801 et seq.) the Navy also requests your concurrence with its analysis and rationale in consideration of impacts of the proposed training on Essential Fish Habitat (EFH), and with its determination that the proposed training may adversely impact EFH but that the effects will be mostly negligible and temporary and may be avoided or minimized through the proposed Best Management Practices.

5750
Ser N4/0670
13 DEC 2018

The information included in the enclosed consultation package is a complete submittal with the exception of maps providing details of areas to be used for training. Only maps showing general training areas are able to be included in Biological Evaluation. Maps containing more detailed training locations are available for NMFS to review in person only. The Navy is therefore requesting a meeting with your ESA and EFH staff in order to provide these maps in person and allow your staff to review them and take the additional information into consideration when completing the consultations. Arrangements for this meeting and any additional questions may be directed to Dr. Kaipo Perez [(808) 471-9863 or kaipo.perez@navy.mil] at Naval Facilities Engineering Command Hawaii. He will be your primary point of contact for these consultations.

Sincerely,



M. R. DELAO
Captain, CEC, U.S. Navy
Regional Engineer
By direction of the
Commander

Enclosure: "Potential Effects of Proposed Naval Special Operations Training within the State of Hawaii on Marine Endangered Species Act-Listed Species and Essential Fish Habitat"

A.2.2 NMFS Response Regarding Consultation under the MSA for Potential Effects to Essential Fish Habitat from Proposed Naval Special Operations Training in Hawaii (28Jun19)

From: Anne Chung - NOAA Affiliate <anne.chung@noaa.gov>
Sent: Monday, December 2, 2019 10:52 AM
To: Perez, Kaipo III CIV USN NAVFAC HAWAII PEARL (USA) <kaipo.perez@navy.mil>; Stuart Goldberg - NOAA Affiliate <stuart.goldberg@noaa.gov>
Subject: [Non-DoD Source] Re: Response to CRs Regarding the Naval Special Warfare and Training Consultation

Aloha Kaipo, apologies for the delay in my response but this letter looks good and aligns with the meetings we've had with the special warfare training project staff. I have filed the letter in our system, thank you again for your help with this consultation.

Thanks,
Anne

On Thu, Nov 21, 2019 at 2:52 PM Perez, Kaipo III CIV USN NAVFAC HAWAII PEARL (USA) <kaipo.perez@navy.mil> wrote:

Hi Mr. Gerry Davis,

I hope all is going well with you and your family. On another note, I have attached a signed, electronic PDF version of the Navy's response to NMFS's EFH Conservation Recommendations Letter for the Proposed Navy Special Operations Training within the State of Hawaii on Essential Fish Habitat.

The Navy appreciates the extension that NMFS provided to complete this letter. Moreover, we are grateful for the time and resources that NMFS has dedicated to assist with this and other consultations. We look forward to working with you in the future and continuing to build and strengthen our partnership.

Should you have any questions or comments please email me. Have a great day.

V/R,
Kaipo
Kaipo Perez III, PhD
Natural Resources Management Specialist (Marine)
NAVFAC Hawaii, Environmental Planning (EV2)
400 Marshall Road, Bldg 55
Joint Base Pearl Harbor-Hickam, HI 96860-3134
kaipo.perez@navy.mil
808-474-2243

From: Anne Chung - NOAA Affiliate <anne.chung@noaa.gov>
Sent: Friday, June 28, 2019 8:34 AM
To: Perez, Kaipo III CIV USN NAVFAC HAWAII PEARL (USA) <kaipo.perez@navy.mil>; Gerry Davis - NOAA Federal <gerry.davis@noaa.gov>; Malia Chow - NOAA Federal <malia.chow@noaa.gov>
Cc: Ian Lundgren - NOAA Federal <ian.lundgren@noaa.gov>
Subject: Re: [Non-DoD Source] Re: Naval Special Warfare and Training Consultation

Dear Mr. Perez,

The Habitat Conservation Division of the National Marine Fisheries Service, Pacific Islands Regional Office (NMFS) has received the United States Naval Special Warfare Command (The Navy, the Applicant) request for an abbreviated essential fish habitat (EFH) consultation. We have reviewed the Navy's EFH Assessment (*Potential Effects of Proposed Navy Special Operations Training within the State of Hawaii on marine Endangered Species Act-Listed Species and Essential Fish Habitat*) that you provided. We appreciate the opportunity to provide the following comments pursuant to EFH provision (section 305(b)) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA; 16 U.S.C. 1855(b)). Our conservation recommendations are meant to ensure your proposed training activities do not adversely affect the EFH that supports our sustainable commercial fisheries.

Project Description

The proposed project entails land, water, and air-based training activities. Project staff would include trainees, a training supervisor, and safety support personnel. Training would occur around six of the main Hawaiian Islands, proposed locations include those around Kaua'i, O'ahu, Maui, Moloka'i, Lana'i, and Hawai'i, on both federal and non-federal property (pending approvals). Water-based activities have been organized into six categories:

- Diver/simmer training activities where trainees would swim/dive to an objective area, includes use of rubber replica weapons.
- Insertion and extraction training activities to approach or depart an objective area using submersible craft, watercraft, using rubber replica weapons unless on one of three military areas.
- Launch and recovery training activities where trainees would launch and recover submersibles or surface craft, these activities may include the use of small ships, jet skis, or small boats.
- Underwater surveillance activities where trainees would learn to operate UUVs.
- Beach landings/over the beach activities where trainees land on the beach and possibly exit the water, cross the beach, and transition to land-based activities.
- Landing and drop zone activities where trainees would utilize existing and new water-based drop zones within Joint Base Pearl Harbor-Hickam (JBPHH) and Marine Corps Base Hawai'i (MCBH).

The Navy has proposed several best management practices (BMPs), namely avoiding contact with bottom habitat, conducting site reconnaissance, and monitoring vessel speed. The Navy has determined that the project may adversely affect EFH, but that the effects are mostly temporary and may be managed and mitigated.

Essential Fish Habitat

The water column and ocean bottom around the main Hawaiian Islands and proposed training sites are defined as EFH and support various life stages for the management unit species (MUS) identified under the Western Pacific Regional Fishery Management Council's Pelagic and Hawai'i Archipelago Fishery Ecosystem Plans. Multiple life stages of MUS are found in surrounding waters of the project area including

various life stages of the Bottomfish MUS; Crustacean MUS; and Pelagic MUS. Underwater substrate within the proposed project area include hardbottom, sand, unconsolidated sediment, pavement, spur and groove, rock/boulder, rubble, artificial, and aggregate reef (Costa and Kendall 2016). Biological cover in these areas range from macroalgae, coralline algae, turf, emergent vegetation, and coral. Coral reefs in Hawai'i include non-structural reef communities, fringing reefs, barrier reefs, and patch reefs. Proposed training would occur in areas of high reef accretion, namely those sheltered from wave action, on leeward sides of islands. The proposed project area also overlaps with the state of Hawai'i's network of Marine Managed Areas (MMAs)¹¹ which include Marine Life Conservation Districts, Fishery Management Areas (FMAs), and Fishery Replenishment Areas (FRAs).

Stressors

Project activities may cause temporary, indirect adverse effects to EFH from multiple stressors: direct physical damage, increased noise levels, increased risk of invasive species, and pollutants.

Direct physical damage: Physical damage may be caused by boats, equipment, or divers during training activities. Physical damage to coral or coral reefs is often associated with the breaking of colonies or in the form of abrasion. The amount of damage is dependent on many factors but is mostly due to the nature of the physical force and the types of corals being impacted (Storlazzi et al. 2005, Shimabukuro 2014). In general, lobate, encrusting, and other massive colony morphologies tend to withstand breakage better than foliose, table, plating, and branching morphologies. However, these more fragile forms tend to have higher growth rates (Minton 2013), which would facilitate more rapid recovery following damage, provided the colony did not experience total mortality. The abundance of fish and other coral-associated organisms are defined by the quantity and quality on a reef's structure and complexity, and any alterations can lead to declines in biodiversity (Alvarez-Filip et al. 2009). For example, Jameson et al. (2007) found that sites suffering from anchor and scuba diver damage had a lower frequency of hard coral and higher percentage of algae, suggesting physical damage can contribute to a shift from coral- to algal-dominated assemblages.

Increased noise: Project activities may result in increased noise, although proposed levels would be below the lethal threshold for most organisms. Sound and vibration can cause stress to individual animals. Due to increased noise, behavioral changes can occur, resulting in animals leaving feeding or reproduction grounds (Slabbekoorn et al. 2010) or becoming more susceptible to mortality through decrease predator-avoidance responses (Simpson et al. 2016). Less intense but chronic noise, such as that produced by continuous boating, can cause a general increase in background noise over a large area. Although not likely to kill organisms, chronic noise can mask biologically important sounds and alter the natural soundscape, cause hearing loss, and/or have an adverse effect on an organism's stress levels and immune system.

Increased risk of invasive species: The project increases the risk of invasive species from moving divers, vessels, and equipment to multiple sites around the main Hawaiian Islands. Introduced species are organisms that have been moved, intentionally or unintentionally, into areas where they do not naturally occur. Species can be introduced to new biogeographies, typically via transport on vessel hulls or in ballast water, such as those that may be used in the applicant's proposed activities. Invasive species rapidly increase in abundance to the point that they come to dominate their new environment, creating adverse ecological effects to other species of the ecosystem and the functions and services it may provide (Goldberg and Wilkinson 2004). Invasive species can decrease species diversity, change trophic structure, and diminish physical structure, but adverse effects are highly variable and species-specific.

Pollutants: Pollutants could be introduced to the marine environment through vessel activities. An increase in contaminants can reduce fitness and cause mortality of exposed organisms. Often, contaminants entering the marine environment are lighter than water, and thus float on the surface where much of it evaporates within a few days (Neff et al. 2000). Unfortunately, this property of some contaminants may lead to greater

exposure for seagrass ecosystems which could cause extensive mortality of the seabed, with the associated loss of juvenile fish and invertebrates due to the loss of habitat (Zieman et al. 1984). For those contaminants that sink, the effects on coral colonies may include mortality, tissue death, reduced growth, impaired reproduction, bleaching, and reduced photosynthetic rates (Fucik et al. 1984, Cook and Knap 1983, Neff and Anderson 1981, Burns and Knap 1989, Ballou et al. 1989, Guzman et al. 1993). Few studies have been conducted on the adverse effects of oil on tropical fish, but decreased growth, altered behavioral responses, and changes in metabolic rate have been observed (Johnson et al. 1979, Kloth and Wohlschlag 1972).

NMFS Concerns and Conservation Recommendations

NMFS is most concerned that there is a potential for the Navy training activities to increase the risk of physical damage to EFH in these areas where habitat forming and servicing benthic marine organisms (e.g., corals) are both critical features and also sensitive and very hard to replace. The use of UUV, and beach landings would increase the risk of damage to coral reef habitat and state marine management objectives because the footprint of Navy training activities overlaps with both nearshore EFH and the state of Hawai'i's network of Marine Managed Areas (MMAs)²¹, increasing the risk of physical damage to sensitive resources and EFH.

In addition, selection of specific training areas should be made with an abundance of caution for the living EFH resources, and shorelines with slow growing and hard-to-replace resources found where EFH is designated in Hawai'i should be avoided entirely. Please be aware that the state's MMAs focus on protection, enhancement, and conservation of habitat and ecosystems, and some regulate fishing and other activities, and are areas of high fishing activity and recreational use. Fishing activities can include use of large nets, lines, weights, hooks used from shore or boats and may be difficult to observe, especially during night operations. These coastal areas are of value both from a biological and socioeconomic standpoint, contributing ecological services for cultural practice, recreation, and commercial use.

Conservation Recommendations

1. Surveillance and site-specific training reconnaissance as described in the Navy-proposed BMPs will determine the actual risk to living EFH resources, and so should be conducted during the day with a coral reef subject matter expert. NMFS is happy to assist if Navy staff are unavailable.
2. Training exercises should not be conducted in areas designated as MMAs by the state of Hawai'i.
3. Avoid conducting training exercises in areas with high fishing activity and those deemed as sensitive public use areas by the state of Hawai'i. If training is necessary within these areas, consult with the Division of Aquatic Resources on how to proceed while minimizing the risk of physical damage to EFH.
4. Ensure no anchors, equipment, tools, and personnel are in contact with any organism, especially coral; instead place anchors in soft sediment in unconsolidated bottom habitats only.
5. All vessels should operate at "no wake/idle" speeds at all times while in water depths where the draft of the vessel provides less than a 2 meter (6 foot) clearance.
6. When conducting activities in shallow water, all vessels should employ a dedicated and qualified "lookout" to assist the pilot with avoiding large coral colonies and other benthic organisms.

Please be advised that regulations (Section 305(b)(4)(B)) to implement the EFH provisions of the Magnuson-Stevens Act require that federal activities agencies provide a written response to this letter within 30 days of its receipt and, a preliminary response is acceptable if more time is needed. The final response must include a description of measures to be required to avoid, mitigate, or offset the adverse

effects of the proposed activities. If the response is inconsistent with our EFH conservation recommendations, an explanation of the reason for not implementing the recommendations must be provided at least 10 days prior to final approval of the activities.

Conclusion

NMFS greatly appreciates the efforts of the Navy to comply with the EFH provisions of the Magnuson-Stevens Act. NMFS agrees that the proposed activities may have temporary effects on EFH. We have provided EFH conservation recommendations that will effectively minimize adverse effects to EFH if fully implemented. We continue to be committed to sufficiently complying with relevant mandates, while achieving the project goals effectively and expeditiously. Please contact Anne Chung at 808-725-5096 and/or anne.chung@noaa.gov with any comments or questions.

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¹¹ <http://dlnr.hawaii.gov/dar/marine-managed-areas/about-marine-managed-areas/>

¹² MMAs proposed to be adversely affected are the Marine Life Conservation Districts (e.g. *Pūpūkea*, O'ahu) and the West Hawai'i Regional Fishery Management Area.

A.2.3 Department of the Navy Response to NMFS EFH Conservation Recommendations (21Nov19)



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5090
N45
November 21, 2019

Mr. Gerry Davis
Pacific Islands Regional Office
National Marine Fisheries Service
1845 Wasp Blvd, Building 176
Honolulu, HI 96818

Dear Mr. Davis:

SUBJECT: EFFECTS OF NAVY SPECIAL WARFARE'S TRAINING ON ENDANGERED SPECIES AND ESSENTIAL FISH HABITAT IN THE MAIN HAWAIIAN ISLANDS – RESPONSES TO PROPOSED CONSERVATION RECOMMENDATIONS

The Navy submitted the subject consultation document on 13 December 2018. National Marine Fisheries Service (NMFS) emailed questions on 22 February 2019, which the Navy replied to on 02 April 2019. NMFS sent proposed Conservation Recommendations on 28 June 2019. In-person meetings were conducted on 27 August 2019 and 10 October 2019 to discuss NMFS' proposed Conservation Recommendations. Below please find the Navy's responses to the Proposed Conservation Recommendations.

Proposed Conservation Recommendations

1. Surveillance and site-specific training reconnaissance as described in the Navy-proposed BMPs will determine the actual risk to living EFH resources, and so should be conducted during the day with a coral reef subject matter expert. NMFS is happy to assist if Navy staff are unavailable.

Response: Naval Special Warfare (NSW) personnel and training staff regularly conduct site surveys prior to conducting training evolutions. As part of the planning process, NSW personnel will gather site-specific information as discussed during the meeting held on 10 October 2019 between NSWG3/NAVFACPAC/NAVREGHI/NOAA. NSW's overall goal is to avoid contact with all marine life to include coral reefs, sea grass beds, and marine mammals. NSW will provide an annual training overview to NMFS via a phone call.

2. Training exercises should not be conducted in areas designated as Marine Managed Areas (MMAs) by the State of Hawai'i.

Response: NSWG3/NAVFACPAC/NAVREGHI met with Ms. Cathy Gewecke, Aquatic Biologist, and Mr. Brian Neilson, Administrator, of the Department of Aquatic Resources (DAR) on 19 July 2019 to discuss concerns regarding training exercises in areas designated as MMAs by the State of Hawai'i. Subsequent meetings were held to follow-up with questions and concerns. After discussion with DAR and NMFS staff, NSW reviewed the proposed training study areas and determined that only two (2) of the proposed training study areas overlap with areas designated as MMAs by the State of Hawai'i – Manele –

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November 21, 2019

Hulopoe Marine Life Conservation District (MLCD - Hulopoe Bay side) Island of Lanai
and Pupukea Marine Life Conservation District (MLCD - Waimea Bay side) Island of
Oahu.

NSW reevaluated these training study areas based on this information. While NSW cannot switch the proposed activities to the other side of the bay due to the water currents and winds at that location at the MMA area near the bay off Lanai, NSW will redefine the proposed training in this area so that no motorized vessels (submarine/zodiacs/jet-skis) will be utilized in the area of concern. All vessels/crafts will be left at the outer boundary of the MLCD. DAR stated that scuba is approved within the MLCD. No over-the-beach training will be conducted at this location.

For Pupukea MLCD, NSW has agreed to adjust the proposed training. No motorized vessels (submarine/zodiacs/jet-skis) will be utilized in the area of concern. All vessels/crafts will be left at the outer boundary of the MLCD. DAR stated that scuba is approved within the MLCD. Over-the-beach training is allowed to be conducted at this location.

3. Avoid conducting training exercises in areas with high fishing activity and those deemed as sensitive public use areas by the State of Hawai'i. If training is necessary within these areas, consult with the DAR on how to proceed while minimizing the risk of physical damage to EFH.

Response: NSW is not able to completely avoid conducting training exercises in areas with high fishing activity and those deemed as sensitive public use areas by the State of Hawai'i; however, it is NSW's goal to avoid interaction with the public. NSW will not proceed with training activities if the area is being heavily utilized by the public.

4. Ensure no anchors, equipment, tools, and personnel are in contact with any organism, especially coral; instead place anchors in soft sediment in unconsolidated bottom habitats only.

Response: The above conservation recommendation is a standard NSW Standard Operating Procedure (SOP), and NSW will comply.

5. All vessels should operate at "no wake/idle" speeds at all times while in water depths where the draft of the vessel provides less than a 2 meter (6 foot) clearance.

Response: The above conservation recommendation is a standard NSW SOP, and NSW will comply.

6. When conducting activities in shallow water, all vessels should employ a dedicated and qualified "lookout" to assist the pilot with avoiding large coral colonies and other benthic organisms.

Response: As stated in the original consultation package dated 13 December 2018, during water-based training activities, vessels and personnel would avoid contact with hard surfaces. A crewmember would act as a lookout during training evolutions on boats and support vessels to avoid large coral colonies and other benthic organisms that are present or that may enter the area during training activities. Lookouts would follow the methods

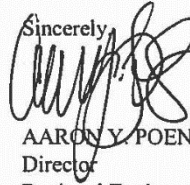
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described in the Lookout Training Handbook (Naval Education Training [NAVEDTRA] 12968 D), especially marine species awareness and night lookout techniques.

The Navy understands that the conservations recommendations are meant to ensure the proposed training activities do not adversely affect the EFH that support sustainable commercial fisheries.

We appreciate the time and careful consideration that went into evaluating the proposed activity and providing EFH conservation recommendations. Should you have any questions about the Navy's response, please contact Dr. Kaipo Perez III at (808) 474-2243 or kaipo.perez@navy.mil.

Sincerely



AARON Y. POENTIS
Director
Regional Environmental Department
By direction of the
Commander

A.2.4 NMFS Service Effects Determination Regarding ESA Informal Consultation for the Proposed Naval Special Operations Training in Hawaii (30Apr20)

U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
Pacific Islands Regional Office
1845 Wasp Blvd., Bldg 176
Honolulu, Hawaii 96818
(808) 725-5000 • Fax: (808) 725-5215

April 30, 2020

M.R. Delao
Captain, CEC, U.S. Navy
Department of the Navy
Commander
Navy Region Hawaii
850 Ticonderoga Street Suite 110
JBPHH, Hawaii 96560-5101

RE: Request for Informal ESA Consultation on Navy Special Warfare Training, Hawaii (PIR-2020-00961; I-PI-20-1826-AG)

Dear Mr. Delao:

On December 13, 2019, NOAA's National Marine Fisheries Service (NMFS) received your written request for concurrence that the Navy's proposed action to conduct warfare training, is not likely to adversely affect (NLAA) the following endangered or threatened species or designated critical habitat under NMFS' jurisdiction: endangered Main Hawaiian Island (MHI) insular false killer whales; endangered Hawaiian monk seals; threatened Central North Pacific green turtles; endangered hawksbill turtles; threatened olive ridley turtles; threatened oceanic whitetip sharks; threatened giant manta rays; and designated critical habitat for Hawaiian monk seals and MHI insular false killer whales. On March 11, 2020, you provided updated location information. Initiation began on that date. This response to your request was prepared by NMFS pursuant to Section 7 of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. §1531 *et seq.*), implementing regulations at 50 CFR 402, and agency guidance for the preparation of letters of concurrence.

Updates to the regulations governing interagency consultation (50 CFR part 402) were effective on October 28, 2019 [84 FR 44976]. We are applying the updated regulations to this consultation. As the preamble to the final rule adopting the regulations noted, "[t]his final rule does not lower or raise the bar on section 7 consultations, and it does not alter what is required or analyzed during a consultation. Instead, it improves clarity and consistency, streamlines consultations, and codifies existing practice." We have reviewed the information and analyses relied upon to complete this letter of concurrence in light of the updated regulations and conclude the letter is fully consistent with the updated regulations.



This letter underwent pre-dissemination review using standards for utility, integrity, and objectivity in compliance with applicable guidelines issued under the Data Quality Act (section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001, Public Law 106-554. A complete record of this consultation is on file at the Pacific Island Regional Office, Honolulu, Hawaii.

Proposed Action

The action consists of land-based, water-based, and air-based warfare training activities. Training exercises will occur primarily at night. Water-based training, or training activities that intersect with the marine environment, have the potential to affect species under NMFS jurisdiction and are the focus of the ESA consultation. Water-based training includes naval special operations personnel diving/swimming, insertion/extraction using submersibles (vehicles designed to operate underwater) or surface craft, launching/recovering submersibles, and unmanned underwater vehicle (UUV) activities. Air-based training activities that have an in-water component, beach landing activities and training on the beach are also included. Water-based training activities would use existing federal and non-federal boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. A ship launch may also occur during training activities in locations that are not served by an existing boat ramp (specific offshore locations of Oahu, Maui, the Island of Hawaii, Kauai, Lanai, and Molokai) or if weather or tidal conditions result in a safety concern regarding a boat ramp launch.

Action Area

The action area for the proposed activity encompasses the proposed training areas in selected coastal nearshore waters throughout the State of Hawaii. Training sites include five regions on Oahu: 1) Joint Base Pearl Harbor-Hickam; 2) South; 3) Windward; 4) North; and 5) West Oahu; and, sites on or near the Island of Hawaii, Kauai, Maui, Lanai, and Molokai. Training activities would occur on federal and non-federal property, pending appropriate approvals. Training locations will vary due to seasonal weather conditions, public presence at sites, protected natural resources considerations, training qualifications to be satisfied, and training requirements.

Listed Species

The ESA-listed threatened and endangered species under NMFS' jurisdiction listed in Table 1 are known to occur, or could reasonably be expected to occur, in the action area, and may be affected by the proposed activities. Detailed information about the biology, habitat, and conservation status of the animals listed in Table 1 can be found in their status reviews, recovery plans, federal register notices, and other sources at <http://www.nmfs.noaa.gov/pr/species/esa/>.

Table 1. Common name, scientific name, ESA status, effective listing date, and Federal Register reference for ESA-listed species considered in this consultation.

Species	Scientific Name	ESA Status	Effective Listing Date	Federal Register Reference
Central North Pacific Green Sea Turtle	<i>Chelonia mydas</i>	Threatened	05/06/2016	81 FR 20057
Hawksbill Sea Turtle	<i>Eretmochelys imbricata</i>	Endangered	06/03/1970	35 FR 8491

Species	Scientific Name	ESA Status	Effective Listing Date	Federal Register Reference
Olive Ridley Sea Turtle	<i>Lepidochelys olivacea</i>	Threatened	08/27/1978	43 FR 32800
Hawaiian Monk Seal	<i>Neomonachus schauinslandi</i>	Endangered	11/23/1976	41 FR 51612
Main Hawaiian Island Insular False Killer Whale	<i>Pseudorca crassidens</i>	Endangered	12/28/2012	77 FR 70915
Oceanic Whitetip Shark	<i>Carcharhinus longimanus</i>	Threatened	03/01/2018	83 FR 4153
Giant Manta Ray	<i>Manta birostris</i>	Threatened	02/21/2018	83 FR 2916
Critical Habitat			Effective Listing Date	Federal Register Reference
Hawaiian Monk Seal			9/21/2015 (revised)	80 FR 50925
Main Hawaiian Island Insular False Killer Whale			8/23/2018	83 FR 35062

Critical Habitat

In designated areas of the MHI, critical habitat for monk seals includes the marine environment with a seaward boundary that extends from the 200-m depth contour line (relative to mean lower low water), including the seafloor and all subsurface waters and marine habitat within 10-m of the seafloor, through the water’s edge 5-m into the terrestrial environment. Detailed information on Hawaiian monk seal critical habitat can be found at http://www.fpir.noaa.gov/PRD/prd_critical_habitat.html.

The essential features for the conservation of the Hawaiian monk seal are the following:

1. Terrestrial areas and adjacent shallow, sheltered aquatic areas with characteristics preferred by monk seals for pupping and nursing;
2. Marine areas from 0 to 200 m in depth that support adequate prey quality and quantity for juvenile and adult monk seal foraging; and
3. Significant areas used by monk seals for hauling out, resting or molting.

Critical habitat for MHI insular false killer whales includes the geographic area of the 45-m depth contour to the 3200-m depth contour in waters that surround the MHI from Niihau east to the Island of Hawaii. Critical habitat for the MHI insular false killer whale consists of one essential feature comprised of four characteristics:

1. Space for movement and use within shelf and slope habitat
2. Prey species of sufficient quantity, quality, and availability to support individual growth, reproduction, and development, as well as overall population growth;
3. Waters free of pollutants of a type and amount harmful to MHI IFKWs; and
4. Sound levels that would not significantly impair false killer whales’ use or occupancy.

Detailed information on MHI insular false killer whale critical habitat can be found at: <http://www.nmfs.noaa.gov/pr/species/mammals/whales/false-killer-whale.html>.

Analysis of Effects

In order to determine that a proposed action is not likely to adversely affect ESA-listed species, NMFS must find that the effects of the proposed action are expected to be insignificant, discountable, or completely beneficial. As defined in the joint USFWS-NMFS Endangered Species Consultation Handbook, beneficial effects are contemporaneous positive effects without any adverse effects to the species. Insignificant effects relate to the size of the impact and should never reach the scale where take occurs¹. Discountable effects are those extremely unlikely to occur. Based on best judgment, a person would not: 1) be able to meaningfully measure, detect, or evaluate insignificant effects; or 2) expect discountable effects to occur (USFWS & NMFS 1998). This standard, as well as consideration of the probable duration, frequency, and severity of potential interactions, was applied during the analysis of effects of the proposed action on ESA-listed marine species, as is described in the consultation request and biological evaluation. Only activities that have the potential to adversely affect ESA-listed species are discussed here.

The Navy identified the following stressors that have the potential to affect listed marine species in the action area:

- physical disturbance
- elevated noise levels
- vessel strikes
- entanglement

Physical disturbance

Human activity is present regularly at many of the sites where training is proposed, and the proposed training will not significantly increase the amount of human activity in the area. The physical presence of trainees, watercraft/vessels, and other equipment associated with in-water training events or the presence of helicopters over the water for in-water extraction and landings will be episodic and of short duration but may disrupt behaviors of species listed in Table 1 such as feeding, resting or reproduction. Avoidance is most likely, and a common natural reaction by listed species and is considered low risk. Behavioral responses may include changing travel direction in response to the physical presence of objects/light, changing depths (e.g., diving deeper into water or heading toward the surface away from submersibles), disruption of feeding or resting activities, or any other normal behaviors. Hawaiian monk seals and sea turtles may respond to the presence of a diver or boat by avoiding, halting their activities, or attraction. However, monk seals, sea turtles, whales, sharks and manta rays are large and agile, and capable of swimming away safely from any disturbance that would harm them. If marine species are unexpectedly encountered during training events, we expect that their behavioral and

¹ Take” is defined by the ESA as harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect any threatened or endangered species. NMFS defines “harass” as to “create the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding, or sheltering.” NMFS defines “harm” as “an act which actually kills or injures fish or wildlife.” Such an act may include significant habitat modification or degradation where it actually kills or injures fish or wildlife by significantly impairing essential behavioral patterns, including breeding, spawning, rearing, migrating, feeding or sheltering. Take of species listed as endangered is prohibited at the time of listing, while take of threatened species may not be specifically prohibited unless NMFS has issued regulations prohibiting take under section 4(d) of the ESA.

physiological responses to the presence of training activity, primarily lasting only as long as the duration of the training activity, and not have any lasting effects on individuals. Adherence to the proposed best management practices (BMPs) would limit interaction and buffer protected species from direct disturbance. BMPs include the requirement to keep a constant vigilance for the presence of ESA-listed marine species during all aspects of the in-water activities. Vessels and personnel will avoid contact with marine species, and if observed within 50 yards of the training activities, training may continue only if, in the best judgment of the lookout, the activity would not affect the animal(s) or training will cease in that area until the animal is no longer observed and/or training will cease for the night.

Due to implementation of BMPs and the episodic nature and short duration of the proposed training exercises, NMFS expects that exposure to disturbance would be low risk. The risk of injury or adverse behavioral responses is extremely unlikely. NMFS has determined that there is a low risk of exposure for green sea turtles, hawksbill turtles, monk seals, oceanic white tip sharks and giant manta rays and disturbance from human activity including divers and research boats is extremely unlikely, and therefore discountable.

Elevated noise levels

Proposed training exercises include the use of motorized support craft for in-water training exercises and helicopters to extract personnel in certain training exercises. Navy activities produce sound and visual disturbances to species listed in Table 1 throughout the action area but limited in time and space to the specific training exercises and areas used. For marine mammals, the Navy (2017), in coordination with NMFS (2018), has established acoustic thresholds using the best available science that identifies the received level of underwater sound above which exposed marine species would reasonably be expected to experience a potentially significant disruption in behavior, or to incur temporary threshold shifts (TTS) or permanent threshold shifts (PTS) of some degree.

Watercraft/vessel noise is generally low frequency (10 to hundreds Hertz [Hz]), but it can extend to above 100 kHz at received levels greater than 100 dB (decibel(s) are referenced to 1 micropascal (μPa)) at close range or in shallow water (Hermannsen et al. 2014). Vessels used in the proposed training activities will be relatively small, less than 30 m and will emit higher-frequency noise than large vessels, in the range of 1-50 kHz. Submerged watercraft that are powered by electric motors, such as UUVs, are generally slow moving and very quiet. Noise effects from UUVs are negligible. The vessels that provide logistic and safety support will be stationary or moving slowly. At slower speeds and when idling, vessel noise is less than when the vessel is travelling at cruising speed. Sound from vessels generally lacks the amplitude and duration to cause any hearing loss in marine mammals, sea turtles, sharks and manta rays. However, behavioral responses may occur as animals avoid these activities.

During training events, especially nighttime training events, obstacle avoidance systems may be used to help with navigation and to detect and avoid marine species. Obstacle avoidance systems will produce some noise, but it is above 200 kHz, which is higher than the hearing range of marine mammals and sea turtles (Popper et al. 2014, Southall et al. 2007), and source levels are less than 160 dB (decibel(s) are referenced to 1 μPa). NMFS (2014, 2015) has determined that devices with specifications of obstacle avoidance systems are considered "*de minimis*" sources of sound in the water.

Low flight altitudes of helicopters during extraction of personnel during training exercises (under 100 feet) may elicit a somewhat stronger behavioral response compared to other proposed activities due to slower airspeed and longer exposure duration, and the downdraft created by the helicopter’s rotor.

Marine mammals, sea turtles, sharks and manta rays would likely avoid the area under the helicopter due to the downdraft, noise, and presence of the helicopter. It is unlikely that any individual would be exposed repeatedly for long periods because these aircraft typically transit open ocean areas within the action area and quickly extract personnel from shoreline areas.

The Navy (2017) identified acoustic thresholds in decibels (dB)(referenced to 1 μ Pa) that identify the onset of TTS and PTS for marine mammals experiencing non-impulsive sounds. For marine mammal species, the TTS threshold ranged from 179-199 dB and the PTS threshold ranged from 199-219 dB. In previous consultations, the Navy has estimated that an H-60 helicopter hovering at 82 feet altitude generates approximately 125 dB (decibel(s) are referenced to 1 μ Pa) at 1 m below water surface. Direct injury and hearing impairment in marine mammals is unlikely to occur because helicopter sound lacks the amplitude or duration to cause any physical damage to these species underwater. Furthermore, due to the brief and dispersed nature of helicopter overflights, masking of biologically relevant sounds is also extremely unlikely.

Very limited information exists regarding hearing and sea turtles. To date, no studies have been conducted specifically related to the onset of TTS or PTS in sea turtles. Therefore, the Navy (2017) has developed thresholds for other similar ESA consultations based on the most current literature on sea turtle and fishes (including as sharks and manta rays) hearing and recommendations made by Popper et al. (2014a) in Sound Exposure Guidelines for Fishes and Sea Turtles. The Navy’s (2017) approach employs the same statistical methodology to derive thresholds as in NMFS’ technical guidance for auditory injury of marine mammals (NOAA 2018). Based on a composite audiogram and data on the onset of TTS in fishes, an auditory weighting function was created to estimate the susceptibility of sea turtles to TTS. Data from fishes were used since there are currently no data on TTS for sea turtles and fishes are considered to have hearing more similar to sea turtles than do marine mammals (Popper et al. 2014a). Results (Table 3) were for impulsive sounds only, however, we use the thresholds here as a conservative estimate of the effects of non-impulsive sounds from aircraft.

Table 3. Acoustic thresholds identifying the onset of PTS and TTS for sea turtles exposed to impulsive sounds (Navy 2017).

Hearing Group	Generalized Hearing Range	Permanent Threshold Shift Onset	Temporary Threshold Shift Onset
Sea Turtles	30 Hz to 2 kHz	204 dB re 1 μ Pa ² -s SEL _{cont} 232 dB re: 1 μ Pa SPL (0-pk)	189 dB re 1 μ Pa ² -s SEL _{cont} 226 dB re: 1 μ Pa SPL (0-pk)

Hz = hertz

O’Hara and Wilcox (1990b) found that loggerhead turtles exhibited avoidance behavior at estimated sound levels up to 175 dB root mean square (rms) (referenced to 1 μ Pa), in a shallow canal. McCauley et al. (2000) reported a noticeable increase in swimming behavior for both green and loggerhead turtles at received levels of 166 dB rms (referenced to 1 μ Pa). At 175 dB rms (referenced to 1 μ Pa), both green and loggerhead turtles displayed increased swimming speed and increasingly erratic behavior (McCauley et al. 2000a). Based on these data, we assume that sea turtles would exhibit a behavioral response when exposed to received levels of 175 dB

rms (referenced to 1 μ Pa) and higher. In previous consultations, the Navy has estimated sound from a helicopter at 82 feet altitude generates approximately 125 dB (decibel(s) are referenced to 1 μ Pa) at 1 m below water surface. According to the Helicopter Association International (HAI), the difference in sound level of a helicopter flying at 500 feet and at 1,000 feet is nine decibels, dropping from 87 dB to 78 dB.

Direct injury and hearing impairment in marine mammals and sea turtles are unlikely to occur because helicopter sound lacks the amplitude or duration to cause any physical damage to these species underwater. Furthermore, due to the brief and dispersed nature of helicopter overflights, masking of biologically relevant sounds is also extremely unlikely. Marine mammals or sea turtles at or near the surface when an aircraft flies overhead at low altitude may startle, divert their attention to the aircraft, or avoid the immediate area by swimming away or diving. Any physiological stress and behavioral reactions would likely be short-term (seconds or minutes) and are expected to return to normal shortly after the aircraft disturbance ceases. The part of the training that could startle or temporarily affect monk seals and turtles is aircraft hovering. If observers identify monk seals or sea turtles persisting in drop zones prior to commencing training, the drop may be moved in time or location in order to avoid possibly interacting with monk seals or turtles. Therefore, effects on marine mammals and sea turtles from aircraft overflight noise are anticipated to be minor, temporary and will not lead to a significant disruption of normal behavioral patterns. As such, the effects from aircraft overflight noise on marine mammals and sea turtles are considered insignificant.

For fishes, PTS has not been documented in any of the studies researching fish (including sharks and manta rays) hearing and potential impairment from various sound sources. This is attributed to the ability for regeneration of inner ear hair cells in fishes, which differs from marine mammals and sea turtles. For this reason, thresholds for fish hearing impairment only includes the SPL related to the potential onset of TTS. A TTS in fishes is considered recoverable, although the rate of recovery is based upon the degree of the TTS sustained. Thus, auditory impairment in fishes is considered recoverable over some duration; and auditory impairment thresholds are based solely on the onset of TTS for fishes. Should sound transmit from aircraft travel into the water column, it would likely only be to a shallow depth and would be below the range of any injury criteria for fishes. Furthermore, aircraft quickly pass overhead. As described above, sound transmission into deep depths of the water column is not likely, and sound that is transferred into the water from air is only within a narrow cone under the aircraft. Therefore, only fishes located at or near the surface of the water and within the limited area where transmission of aircraft noise is expected to occur have the potential to detect any noise produced from low-flying aircraft. Additionally, due to the short-term, transient nature of aircraft noise, sharks and manta rays are unlikely to be exposed multiple times within a short period of time that could lead to ongoing behavioral disruptions or stress. Any physiological stress and behavioral reactions would likely be short-term (seconds or minutes) and are expected to return to normal shortly after the aircraft disturbance ceases. Therefore, the effects on sharks and manta rays from aircraft overflight noise are anticipated to be minor, temporary and will not lead to a significant disruption of normal behavioral patterns. As such the effects from aircraft overflight noise on sharks and manta rays are considered insignificant (i.e., so minor that the effect cannot be meaningfully evaluated).

BMPs will be implemented to reduce effects of noise including reducing vessel speed when piloting vessels at or within 100 yards of marine mammals and sea turtles, vessel operators and

support personnel will be particularly vigilant to watch for turtles at or near the surface, all vessels will avoid approaching marine mammals and sea turtles head on and shall maneuver to maintain a buffer zone of 100 yards away (except bow riding dolphins), if marine mammals or sea turtles are observed in the vicinity of vessels and the training activity vessels will be recalled, emergency devices (e.g., recall devices, flares, jet skis) will be used away from any protected species that may be in the vicinity, vessels and personnel will actively move away from the direction that the marine species is traveling by putting the engine in neutral until the animal is at least 50 feet away, and then slowly move away to the prescribed distance, vessel engines will be turned off or kept at the quietest setting possible when not actively in use to reduce disturbance to species listed in Table 1.

Vessel strikes

Marine mammals and sea turtles' surface to breathe, increasing the risk of vessel strike. However, vessel operations would pose low risk to ESA-listed species in the training areas, as vessel speeds would be required to be low and controlled (i.e., 0.5 knots). The speed restrictions are intended to reduce the probability of collisions and the severity of injuries if one occurs. The U.S. Navy and NMFS estimated that 250 sea turtles are struck by vessels in Hawaii (NMFS 2018). To estimate the rate of vessel strikes, the Navy used ship hours (number of hours that vessels were at sea) but it only included vessels 65-feet long and larger. Since the vessels used in this action are much smaller and generally travel closer to shore than large vessels (where turtles are more concentrated), the use of ship hours of 65-feet and larger vessels would be inappropriate. NMFS (2008) estimated 37.5 vessel strikes of sea turtles per year from an estimated 577,872 trips from vessels of all sizes in Hawaii. It is reasonable that the number of vessel trips have also increased but we have no information to support this claim. Using the 2008 estimate, this calculates to a 0.04% probability of a vessel strike for all vessels and trips, many of who are not reducing speeds or employing lookouts for listed species. Vessel strikes with Hawaiian monk seals are even rarer. According to PIFSC's database there have been only four verified vessel strikes of Hawaiian monk seals since 1981 (John Henderson, PIFSC 5/4/17). Other wounds and blunt force trauma have been documented but wounds, especially those that have healed, are difficult to distinguish between vessel strikes and other blunt force trauma such as intentional killing. Considering the use of lookouts, slower speeds and avoidance of areas when listed species are observed, the probabilities are likely even lower. Thus, we expect effects on sea turtles and Hawaiian monk seals from vessel collisions to be discountable.

The risk of exposure to vessel strikes is low for oceanic white tip sharks and manta rays. These species are not routinely on the surface, are not air breathers and are not often observed in Hawaii. Oceanic whitetips are more common than giant manta rays but at-surface habits are much less common than mantas, who are known to congregate at the surface and breach on occasion. Few, if any, vessel strikes on those particular animals have ever been recorded.

Based on the limited scope of the proposed action and low vessel speeds that will be implemented, NMFS has determined that there is a low risk of exposure to vessels for Hawaiian monk seals, green sea turtles, hawksbill turtles, oceanic white tip sharks and giant manta rays and vessel strikes are extremely unlikely, and therefore discountable.

Entanglement

Tethers on UUVs and parachutes from trainees who are dropped in water landing zones present potential entanglement hazards to ESA-listed species. Both of these pieces of equipment will be under the control of the operators at all times. Parachutes are gathered and retained by personnel

who drop into the water because it follows the operating principle of not leaving behind evidence of activity in the area. Tethers will be under the control of personnel the entire time UUVs are operated. Cables proposed for UUV training, which includes ROVs, are rigid and do not form loops. The cables are an integral part of UUV systems and would not be discarded in the environment. BMPs will be used to further avoid entanglement of ESA species including keeping constant watch for the presence of ESA-listed marine species during all aspects of the in-water activities. Vessels and personnel will avoid contact with ESA-listed marine species or if observed avoid or cease activity. Marine mammals and sea turtles shall not be encircled or trapped between multiple vessels or between vessels and the shore and support personnel will visually assess all equipment attachments (e.g., ROV tethers, submersible weight lines) throughout training events to minimize entanglement risk to marine mammals and sea turtles. In addition, BMPs require that equipment attachments shall be kept to the minimum lengths necessary and remain deployed only as long as needed to properly accomplish the training activity. Attachments will be kept taut enough to avoid loops but with enough slack to avoid preventing animals from passing by. Based on the limited scope of the proposed action and BMPs that will be implemented to avoid entanglements, NMFS has determined that there is a low risk of exposure for Hawaiian monk seals, green sea turtles, hawksbill turtles, oceanic white tip sharks and giant manta rays and entanglements are extremely unlikely, and therefore discountable.

Critical Habitat

Proposed Navy training activities overlap marine areas that have been designated critical habitat for juvenile and adult monk seal foraging. Hawaiian monk seals eat a variety of fish species, as well as some invertebrates. Due to implementation of BMPs designed to avoid disturbing monk seals, the short term and infrequent nature of any exposures to helicopters used to extract personnel, watercraft, UUVs or personnel they would not likely produce an adverse effect. For these reasons, it is extremely unlikely that any essential features of critical habitat would be adversely affected and the effects of the action on monk seal designated critical habitat are considered discountable.

The final rule designating MHI false killer whale critical habitat explains: “scientific information also indicates that the introduction of a permanent or chronic noise source can degrade the value of habitat by interfering with the sound-reliant animals ability to gain benefits from that habitat, impeding reproduction, foraging, or communication (i.e., altering the conservation value of the habitat)...chronic exposure to noise as well as persistent noise may impede the population's ability to use the habitat for foraging, navigating, and communicating, and may deter MHI IFKWs from using the habitat entirely.” Thus, the duration and magnitude of the proposed activity is important to consider in determining the likely severity, duration, and potential consequences of exposure and associated response of marine mammals. The proposed training exercises and noise for helicopters used to extract personnel would be short duration, infrequent and transient and would therefore not alter behavior in any measurable way or impede the population's use or occupancy of designated critical habitat for important biological functions including obtaining prey species. For these reasons, we have determined that MHI false killer whale use of designated critical habitat is not likely to be disrupted and we do not anticipate that either individuals or the population would avoid or abandon use of the habitat for important biological functions. Thus, no essential feature of MHI false critical habitat is expected to be adversely affected in any meaningful way. These effects are therefore insignificant.

Conclusion

Considering the information and assessments presented in the consultation request and available reports and information, and in the best scientific information available about the biology and expected behaviors of the ESA-listed marine species considered in this consultation; NMFS concurs with your determination that the proposed action is not likely to adversely affect the following ESA-listed species, and designated critical habitat: endangered MHI insular false killer whales; endangered Hawaiian monk seals; threatened Central North Pacific green turtles; endangered hawksbill turtles; threatened olive ridley turtles; threatened oceanic whitetip sharks; threatened giant manta rays; and designated critical habitat for Hawaiian monk seals and Main Hawaiian Islands insular false killer whales.

This concludes your consultation responsibilities under the ESA for species under NMFS's jurisdiction. If necessary, consultation pursuant to Essential Fish Habitat would be completed by NMFS' Habitat Conservation Division in a separate communication.

Reinitiation Notice

ESA Consultation must be reinitiated if: 1) Take occurs to an endangered species, or to a threatened species for which NMFS has issued regulations prohibiting take under section 4(d) of the ESA; 2) new information reveals effects of the action that may affect ESA-listed species or designated critical habitat in a manner or to an extent not previously considered; 3) the identified action is subsequently modified in a manner causing effects to ESA-listed species or designated critical habitat not previously considered; or 4) a new species is listed or critical habitat designated that may be affected by the action.

If you have further questions, please contact Alice Berg at alice.berg@noaa.gov. Thank you for working with NMFS to protect our nation's living marine resources.

Sincerely,

GARRETT.ANN.

M.1365883323

Ann M. Garrett

Assistant Regional Administrator

Protected Resources Division

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Cc: kaipo.perez@navy.mil
NMFS File No.: PIR-2020-00961
PIRO Reference No.: I-PI-20-1826-AG

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Appendix A

Best Management Practices (BMP) for General In-Water Work Including Boat Operations

January 2015

NMFS Protected Resources Division recommends implementation of the following BMP to reduce potential adverse effects on protected marine species. These BMPs are not intended to supplant measures required by any other agency, and compliance with these BMP shall always be considered secondary to safety concerns.

All workers associated with this project, irrespective of their employment arrangement or affiliation (e.g. employee, contractor, etc.) should be fully briefed on required BMP and the requirement to adhere to them for the duration of their involvement in this project.

A. Constant vigilance shall be kept for the presence of ESA-listed marine species during all aspects of the proposed action, particularly in-water activities such as boat operations, diving, and deployment of anchors and mooring lines.

1. The project manager shall designate an appropriate number of competent observers to survey the areas adjacent to the proposed action for ESA-listed marine species.
2. Surveys shall be made prior to the start of work each day, and prior to resumption of work following any break of more than one half hour. Periodic additional surveys throughout the workday are strongly recommended.
3. All work shall be postponed or halted when ESA-listed marine species are within 50 yards of the proposed work, and shall only begin/resume after the animals have voluntarily departed the area. If ESA-listed marine species are noticed within 50 yards after work has already begun, that work may continue only if, in the best judgment of the project supervisor, that there is no way for the activity to adversely affect the animal(s). For example, divers performing surveys or underwater work would likely be permissible, whereas operation of heavy equipment is likely not.
4. Special attention will be given to verify that no ESA-listed marine animals are in the area where equipment or material is expected to contact the substrate before that equipment/material may enter the water. This includes the requirement to limit anchoring to sandy areas well away from coral.
5. All objects will be lowered to the bottom (or installed) in a controlled manner. This can include the use of buoyancy controls such as lift bags, or the use of cranes, winches, or other equipment that affect positive control over the rate of descent.

6. In-water tethers, as well as mooring lines for vessels and marker buoys shall be kept to the minimum lengths necessary, and shall remain deployed only as long as needed to properly accomplish the required task.
 7. When piloting vessels, vessel operators shall alter course to remain at least 100 yards from whales, and at least 50 yards from other marine mammals and sea turtles.
 8. Reduce vessel speed to 10 knots or less when piloting vessels at or within the ranges described above from marine mammals and sea turtles. Operators shall be particularly vigilant to watch for turtles at or near the surface in areas of known or suspected turtle activity, and if practicable, reduce vessel speed to 5 knots or less.
 9. If despite efforts to maintain the distances and speeds described above, a marine mammal or turtle approaches the vessel, put the engine in neutral until the animal is at least 50 feet away, and then slowly move away to the prescribed distance.
 10. Marine mammals and sea turtles shall not be encircled or trapped between multiple vessels or between vessels and the shore.
 11. Do not attempt to feed, touch, ride, or otherwise intentionally interact with any ESA-listed marine species.
- B. No contamination of the marine environment shall result from project-related activities.
12. A contingency plan to control toxic materials is required.
 13. Appropriate materials to contain and clean potential spills shall be stored at the work site, and be readily available.
 14. All project-related materials and equipment placed in the water shall be free of pollutants.
 15. The project manager and heavy equipment operators shall perform daily pre-work equipment inspections for cleanliness and leaks. All heavy equipment operations shall be postponed or halted should a leak be detected, and shall not proceed until the leak is repaired and equipment cleaned.
 16. Fueling of land-based vehicles and equipment shall take place at least 50 feet away from the water, preferably over an impervious surface. Fueling of vessels shall be done at approved fueling facilities.
 17. Turbidity and siltation from project-related work shall be minimized and contained through the appropriate use of erosion control practices, effective silt containment devices, and the curtailment of work during adverse weather and tidal/flow conditions.
 18. A plan shall be developed to prevent debris and other wastes from entering or remaining in the marine environment during the project.

A.3 NATIONAL HISTORIC PRESERVATION ACT (NHPA) SECTION 106 CONSULTATION**A.3.1 Department of the Navy Initiation of NHPA Section 106 Review for Proposed Naval Special Operations Training in Hawaii (22Aug18)**

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JSPHH, HAWAII 96860-5101

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CERTIFIED NO: 7016 0910 0001 0891 9240

Dr. Alan Downer
Deputy State Historic Preservation Officer
Department of Land and Natural Resources
Kakuhihewa Building, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

Dear Dr. Downer:

**SUBJECT: HISTORIC PRESERVATION ACT, SECTION 106 REVIEW:
PROPOSED NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII**

In accordance with 36 CFR Part 800, the United States (U.S.) Naval Special Warfare Command is initiating National Historic Preservation Act (NHPA) Section 106 consultation regarding a proposal to conduct land, maritime, and air-based training activities for Naval Special Operations personnel in the State of Hawaii. We have determined that the proposed project is an undertaking as defined in §800.16(y).

DESCRIPTION OF UNDERTAKING

The proposed undertaking, which is undergoing National Environmental Policy Act (NEPA) review via an Environmental Assessment (EA), consists of small unit intermediate and advanced land, maritime, and air training activities for Naval Special Operations personnel in nearshore waters and land-based areas on Oahu, Hawaii Island, and Kauai; and water-based training in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai [enclosures 1 to 7]. The training is proposed for areas within various tax map keys (TMKs) [enclosure 8].

This training is needed to ensure that special operation forces acquire and master the individual and team skills in the marine, terrestrial, and aviation aspects of naval special operations in order to progress to more advanced training and to be combat-ready when called to conduct special operations in support of combatant commanders.

The training would include small-unit land, maritime, and air training activities [enclosure 9] for purposes of teaching trainees the skills to remain undetected (silent and unseen) and to leave no trace of their presence during or after the training activity. The proposed training activities broadly fit into three categories: land-based training, water-based training, and air-based training.

- Land-based training would include personnel transiting over the beach on foot throughout the proposed Hawaiian Islands training areas; the proposed training on military installations

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- would include simulating building clearance activities using simulated munitions, high angle climbing, and learning observation techniques in a pre-arranged scenario (special reconnaissance operations).
- Water-based training generally includes Naval Special Operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination with air-based and land-based activities throughout the proposed training area.
- Air-based training would include the use of unmanned aircraft systems, helicopters, and MV-22 tilt rotor Osprey, utilizing drop zones (DZs), landing zones (LZs), or rope suspension training activities on military installations. DZs consist of large areas up to 1,000 yard in circumference where trainees land after parachuting from an aircraft at an altitude of 5,000 feet and above. LZs consist of relatively flat surfaces, often with a hard surface up to 1,000 yards in circumference where helicopters can land and take off safely. The proposed training includes development of new LZ/DZs at Waipio Peninsula, Pearl City Peninsula Annex, Ford Island, and a DZ at Lualualei. Vegetation removal or cutting would be limited to the LZ/DZ at Waipio Peninsula on Oahu [enclosure 10], which requires an area up to 1,000 yards in circumference to be cleared to ensure the safety of trainees during this activity. LZ/DZ training is also proposed at existing LZ/DZs at Marine Corps Base Hawaii and Kahuku Training Area. No construction or vegetation removal will be necessary at locations other than Waipio Peninsula.

Training activities on the land, in the water, or in the air could occur as a single or integrated events performed sequentially to meet the training objectives. Training would occur over the course of each year among identified sites within the State of Hawaii, including federal and non-federal properties. Each non-federal training site would be used for a maximum of 10 events per year (pending receipt of real estate agreements/right-of-entry permits) within the training study area. The maximum number of events across all non-federal land training sites would not exceed 330 events. For federal property, up to 265 events would occur per year.

AREA OF POTENTIAL EFFECT

The area of potential effect (APE) would include the footprint of the Naval Special Operations training area in the State of Hawaii [enclosures 2 to 7]. The proposed training area is described below.

Oahu Island

Training on Oahu falls within five traditional districts: Ewa, Kona, Koolaupoko, Waialua, and Waianae and includes federal properties: Joint Base Pearl Harbor-Hickam, Lualualei Training Area, U.S. Coast Guard Station Barbers Point, Iroquois Point Harbor, Puuloa Range Training

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Facility (RTF), Kaena Point Satellite Tracking Station, Marine Corps Base Hawaii, and Kahuku Training Area; as well as Hawaii State Parks and private lands.

Training will occur along beaches and near shore waters on the southern, windward, northern, and western sides of Oahu. The southern side of the island includes the area between the Coast Guard Station at Barbers Point and Maunaloa Boat Ramp and includes Kona District and Ewa District. Many of the areas proposed include developed harbors, such as Keehi Boat Harbor, Iroquois Point Harbor, Rainbow Bay Marina, Kewalo Basin Harbor, and Maunaloa Boat Ramp. Beaches and beach parks proposed for training include Honeymoon Beach, White Plains Beach, and Ala Moana Beach, and the beach fronting Puuloa RTF. Other areas along the southern shore include Sand Island, U.S. Coast Guard Station Barbers Point, and Joint Base Pearl Harbor Hickam.

Locations for proposed training on the windward side of the island are within Koolau Poko District and are located between Makapuu Beach and Kahana Bay. Heeia Kea Harbor, a developed harbor, is located in this area. Other training areas include Marine Corps Base Hawaii. Beaches in this area include Makapuu Beach, Waimanalo Beach, Kailua Beach, and Kahana Bay.

Areas proposed for training on the northern side of Oahu within Waialua District include the Kanes DZ in the Army's Kahuku training lands and Haleiwa Boat Harbor. Beaches and beach parks in the northern training area include Waimea Beach, Haleiwa Beach, Polo Beach, and Mokuleia Beach.

Areas proposed for training along the western shore of Oahu include Waianae District and extend between Keawaula Beach (Yokohama's Beach) and Barbers Point Harbor. Developed harbors proposed for training include Ko Olina Marina and Barbers Point Harbor. Other areas along western Oahu proposed for training include Kaena Point Satellite Tracking Station, and Lualualei Training Area. Beaches and beach parks that may be used include Keawaula Beach, Makaha Beach, Pokai Bay Beach, and Ulehawa Beach.

Hawaii Island

The proposed training area for the Island of Hawaii includes two stretches of coast along the western side of the island. Land-training areas may occur from Mahukona State Park to Kawaihae Harbor in Kohala and from Hualalai Golf Course to Captain Cook in Kona. Developed harbors proposed for training include Mahukona Harbor, Kawaihae Harbor, and Honokohau Small Boat Harbor. Beaches and beach parks include Mahukona State Park, Lapakahi State Historical Park, Kikaua Point Park, Maniniowali Beach, Makalawena Beach, Mahaiula Beach, Kekaha Kai State Park, Wawaloli Beach Park, Kohanaiki Beach, Pine Trees Surfing Beach, Old Airport State Recreational Area, and Hale Halawai Park.

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Kauai Island

One area on the western side of Kauai between Pacific Missile Range Facility and Polihale State Park is proposed for training. The area includes Polihale State Park and Barking Sands Beach.

Lanai Island

Two in water training sites are proposed along the coast of Lanai. One is between Kaholo Pali and Honopu Bay near Nanahoa (two sea stacks) and includes Kaumalapau Harbor. The other is between Puupehe near Hulopoe Beach and Huawai Bay near the islet of Poopoo.

Maui Island

One area proposed for water-based training only is off the northwestern side of Maalaea Bay on the mid-southern shore of Maui.

Molokai Island

The area proposed for water-based training only is off the southern shore of Molokai in the waters between Hale O Lono Harbor and Kaunakakai Harbor.

IDENTIFICATION OF HISTORIC PROPERTIES

The proposed training activities for Naval Special Operations will take place within the Hawaiian Islands. The majority of the training will occur in public harbors and beach parks where no historic properties are present; however, some of the areas have historic properties in or near where the proposed training would occur.

Pursuant to 54 U.S.C. §306102(b), the Navy reviewed existing information on historic properties within the APE from the State Historic Preservation Division (SHPD), the Department of Defense (DoD) cultural resources reports, and from the National Park Service's Focus digital library. The records search yielded 852 historic properties in the APE: 580 from Oahu, 182 from Hawaii Island, 80 from Kauai, 4 from Maui, and 6 from Molokai. Although these historic properties are within the APE, the majority will not be utilized for training.

Listed historic properties identified in the Focus digital library within the APE identified five national historic landmarks (NHLs), five historic districts, three buildings and structures, two historic objects, and six archaeological sites [enclosure 11].

National Historic Landmarks

- Falls of Clyde
- Hickam Field
- Huilua Fishpond
- Kaneohe Naval Air Station
- United States Naval Base Pearl Harbor

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Historic districts listed on the NRHP

- Chinatown Historic District
- Kapapa Island Complex
- Lapakahi Complex
- Merchant Street Historic District
- Waianae District

Built historic resources listed on the NRHP

- Aloha Tower at Pier 9
- Battery Hasbrouck
- Battery Hawkins
- Battery Jackson
- Battery Selfridge
- Hale Halawai O Holualoa
- Hulihee Palace
- Moana Hotel
- Mokuaikaua Church
- U.S. Coast Guard Makapuu Light House
- USS *Arizona* Memorial
- USS *Arizona*
- USS *Utah*
- World War I Memorial Natatorium

Historic objects listed on the NRHP

- USS *Bowfin*
- USS *Missouri*

Archaeological sites listed on the NRHP

- Heeia Fishpond
- Kalaoa Permanent House
- Kiholo-Puako Trail or Ala Loa (long trail) Trail
- Oahu Rail and Land (OR&L) right of way
- Okiokilepe Pond

Historic resources eligible for listing on the NRHP

Traditional and historic resources are located in the waters and on the shore of the Hawaiian Islands, many of which have not been assessed for eligibility; however, they will be treated as eligible for consultation purposes.

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Of the 852 historic properties identified within the APE, 49 submerged properties have been found within the APE [enclosure 12]. Training areas for Maui, Molokai, and Lanai are in the water and include only submerged historic properties.

Molokai:

Historic properties in the waters off Molokai include six fishponds along the southwestern coast between Hale O Lono Harbor and Kaunakakai Harbor (Kikauhi, Keanakalole, Kukuku, Pakanaka, Kaluaapuhi, and Kalokoeli fishponds).

Maui:

Historic properties within the APE include a World War II era plane and three tracked amphibious vehicles in Maalaea Bay that originated from the former Naval Air Stations at Puunene and Kahului.

Lanai:

No historic properties have been identified within the APE around Lanai.

Oahu:

Submerged and terrestrial historic properties are present around Oahu. Most activities on DoD land will take place at least partially within the Pearl Harbor National Historic Landmark. Thirty-six submerged resources have been identified within the proposed training area. Submerged historic properties include 29 traditional Hawaiian fishponds and fishpond remnants. Submerged resources from the Historic Period include four aircraft within the training area APE: a flying boat (PBY Catalina) in Kaneohe Bay, a P-40 Warhawk in Kaneohe Bay, F4-U Corsair in Maunalua Bay, and a P-47 Thunderbolt in Kailua Bay. Two ships that were sunk during the 1941 attack are located in Pearl Harbor: USS *Arizona* and USS *Utah*. These shipwrecks are listed on the NRHP (see enclosure 11).

Historic properties within the APE on Oahu include archaeological sites and historic buildings. Some of the archaeological sites include religious sites, such as Mokaena Heiau (Site 50-80-03-0188), Kolea Koa (Fishing Shrine) (Site 50-80-03-0195), and Kawaihapai (a Kuakea Koa - Site 50-80-03-0193), as well as large complexes such as the Barbers Point Archaeological District (Site 50-80-12-2888) and Keawaula Complex (Site 50-80-03-2805). Other historic properties include Waialua Sugar Company Road (Site 50-80-04-7604), Farrington Highway (Site 50-80-7-6824), the Mark Robinson Beach House (Site 50-80-11-9748), the Miles and Kathy Anderson House (Site 50-80-11-6937), and Haleiwa Beach Park (Site 50-80-04-1388).

The proposed training includes simulated building clearance at Joint Base Pearl Harbor-Hickam and Lualualei on Oahu. Training consists of conducting simulated actions within a confined area or building to develop the trainees' ability to operate within a small unit, move into a structure and conduct clearance from room to room. The intent is for trainees to remain concealed and silent, and then depart the area avoiding detection with minimal disturbance. Combat

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scenarios involve the use of simulated weapons and simulated munitions that fire marking rounds, which are specialized plastic/paint capsules that are environmentally friendly and water soluble. The temporary marks these simulated munitions make are about the circumference of a dime. No property damage would occur, and cleanup (picking up simulated marking rounds/washing away paint marks if present) would be handled by the instructors and support staff immediately at the conclusion of the training scenario. Simulated building clearance is only proposed on DoD property within the training study area and in areas typically separate from the public. Simulated building clearance is proposed for buildings within Joint Base Pearl Harbor-Hickam, including Ford Island, Hickam Mobile Salvage Unit, Honeymoon Beach, Lualualei, Pearl City Peninsula, Puuloa Demolition Range, and Waipio Peninsula. Of the 38 buildings proposed for building clearance, 22 are listed or eligible for listing on the NRHP [enclosure 13]. Eligible buildings are located at Ford Island, Hickam Mobile Salvage Unit, and Lualualei. The decommissioned battleship USS *Missouri*, located at a pier on the southern side of Ford Island, is listed on the NRHP and is proposed for simulated clearance activities.

The proposed undertaking includes development of DZs/LZs on Oahu, including Waipio Peninsula, Pearl City Peninsula Annex, Ford Island, and a DZ at Lualualei. Removal of vegetation is proposed for the Waipio Peninsula LZ/DZ [see enclosure 10]. This area consists of a filled-in fishpond and former sugarcane fields. The former fishpond is now vegetated and contains non-native plants, such as red mangrove (*Rhizophora mangle*) and kiawe (*Prosopis pallida*). Portions of Waipio Peninsula were acquired during World War II, some of which was used for storage. Little construction appears to have occurred during World War II in the former sugarcane fields where the LZ/DZ vegetation clearing is proposed [enclosure 14]. No historic properties have been identified in this area. Waipio Peninsula falls within the boundaries of the Pearl Harbor NHL. Removal of the non-native vegetation on Waipio Peninsula and use of the DZ/LZ will not adversely affect the NHL.

Development of a DZ/LZ at Pearl City Peninsula would not include vegetation removal or ground disturbance. The DZ is proposed for the mid-western side of the peninsula and will not include helicopter landing. The LZ is proposed for the southeastern side in the grassy field [enclosure 15]. Formerly it was a low-lying marshland that was used as a wetland rice field during the early 20th century (Allen 2007) [enclosure 16]. Between 1944 and 1945, the wetlands/rice fields were filled in the northwest portion of the peninsula for construction of the Pearl City Fuel Annex. The area west of the fuel farm was used as a dredge disposal site until 1951 [enclosure 13]; by 1971 it was identified as a sanitary land fill. No historic properties have been identified in this area. The area proposed for the LZ at Pearl City Peninsula is currently a concrete pad. It overlies filled land that was once a fishpond called Loko Weloko (Site 09-0116). Paleo-environmental coring at the pond indicates that there is about 370 centimeters of fill overlying fishpond deposits (Athens et al. 2000). The concrete pad is the foundation of a warehouse constructed in 1942 as part of its Supply Center Provisions Annex and is not eligible for listing on the NRHP [enclosure 17]. Pearl City Peninsula falls within the boundaries of the Pearl Harbor

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NHL. Use of the DZs and LZs on Pearl City Peninsula will not alter the appearance of the peninsula and thus not adversely affect the NHL.

Two proposed DZ/LZs are located at Ford Island. Location 1 is LZ near the center of the island on the runway surface and Location 2 is a DZ on the north end of the island in a grass field north of the Navy Lodge and no helicopters landing will occur. No vegetation clearing or ground disturbance would be conducted at either location. Location 1 is on the former landing mat, which was 4,000 feet long and completed in 1941. Location 2 was developed during World War II for a magazine complex and a softball field. The complex of magazines was constructed near the Carrier Wharf in 1942 and the softball field constructed on filled land in ca. 1944. By 1950, most air activities moved to Naval Air Station Barbers Point and the airfield was reduced in size to 200 by 4,000 feet [enclosure 18]. By 1962, the airfield at Ford Island was decommissioned. During this period, there was a gradual removal of buildings from the island [enclosure 19]. Currently in Location 1, the runway is overgrown with grass [enclosure 20]. No archaeological sites have been identified under the airfield. No vegetation clearing or ground disturbance will be required. In Location 2, the footprint of the magazine complex is visible in aerial photographs; however, the complex has been demolished. The eastern section of the softball field has been incorporated into a dog park; the western portion remains an unimproved field. These features are not eligible for listing on the NHRP. No archaeological sites have been identified in this area, which consists of filled land. Although Ford Island is part of the Pearl Harbor NHL, utilizing DZs and LZs on the island is consistent with its historic use as an airfield and will not adversely affect the historic property.

Two LZs are proposed for development at NAVMAG Lualualei [enclosure 21], which was developed by the Navy between 1928 and 1931. The naval magazines are no longer used and support facilities were relocated to West Loch. Many of the facilities within the installation have been abandoned. The proposed DZs are located within an area that lacks integrity. Location 1, located north of Constitution Road, is a ballfield that dates to the beginning of World War II. The supporting structures for the ballfield have been removed and it currently consists of a grassy field [enclosure 22]. Location 2 is a paved area that forms the intersection between Kolekole Road, 15th Street, 17th Street, and 66th Street [enclosure 23]. The rail line formerly ran along this route, paralleling the road to the magazines. No evidence of the rail is present in this area. The ammunition office and shops buildings were formerly in this location. They were demolished along with many of the World War II buildings following the war. No historic properties or archaeological sites have been identified in the area of the proposed LZs.

Hawaii Island:

Submerged and terrestrial historic properties are present around Hawaii Island. Submerged historic properties within the APE include the wooden-hulled SS *Kauai* that sank off Mahukona Port on Christmas day in 1913; the iron-hulled SS *Maui* that sank near Kekaha Kai State Park in 1917; and the *Fuji Maru*, which sank in 1943 off Kekaha Kai State Park during a storm.

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Historic properties on the island of Hawaii within the APE include religious sites such as Koa of Halepau (Site 50-10-27-2139) and Mailekini Heiau (Site 50-10-27-13584). Complexes include Unu O Lono (Site 50-10-27-13593) and Maumalei (Site 50-10-27-13599). Other eligible sites include salt pans (Site 50-10-27-4123) and habitation sites containing salt pans (50-10-27-18808), petroglyphs (Site 50-10-27-2001; 50-10-27-15133), and trails (Site 50-10-27-16191). The Old Kawaihae-Puako Road (Site 50-10-27-14057) is also eligible for listing on the NRHP.

Kauai:

No submerged historic properties have been identified within the APE on Kauai. Historic properties located on Kauai within the APE include Kawaiiele Ditch (Site 50-30-05-0721), which is said to have been constructed by Menehune (little people), and numerous sites and features on Nohili Dune, including Elekuna Heiau (Site 50-30-01-0008), burial sites (50-30-01-0007), house sites (50-30-01-0009), and cultural deposits (Sites 50-30-01-2019, 50-30-01-2021, and 50-30-05-0826). Historic properties from the historic era include aircraft revetments (Site 50-30-01-2032 and 50-30-01-2038), a gun emplacement complex (Site 50-30-01-2028), and a pillbox complex (Site 50-30-01-2030).

DETERMINATION OF AFFECT

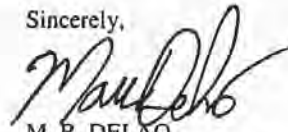
With the initiation of the Section 106 process for the proposed Naval Special Operations Training in Hawaii, the Navy is seeking information from consulting parties and Native Hawaiian Organizations to help identify historic properties in the APE. Following identification and evaluation of historic properties, the Navy, in consultation with the State Historic Preservation Officer (SHPO) and Native Hawaiian Organizations that attach religious and cultural significance to the identified property, will assess the effects of the undertaking on historic properties in a manner consistent with the standards and criteria of 36 CFR 800.4 through 800.5. The Navy does not anticipate that the undertaking will adversely affect historic properties within the APE in accordance with the Section 106 Implementing Regulations at 36 CFR 800.5(c) since the activities are non-invasive and based on the following: 1) the proposed training does not involve modifications to the area, such as excavation or vegetation removal except in the previously disturbed area of Waipio Peninsula; 2) historic properties, such as religious features and burial areas, have been identified and will be avoided during training activities; 3) use of historic buildings will follow established protocols to protect the buildings that include removal of all training materials afterwards; and 4) permission of landowners will be obtained before training occurs and any cultural resource protections required by the landowners will be followed, such as staying on trails or avoiding sensitive areas. Following input from consulting parties and Native Hawaiian Organizations, the Navy will inform SHPO, Native Hawaiian Organizations, and consulting parties of any additional information regarding the identification of historic properties. This information will be used to assess the effects of the proposed training on historic properties.

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The Navy is forwarding a copy of this letter to Native Hawaiian organizations and historic partners listed in enclosure 24 and inviting them to participate in the Section 106 process for this proposed undertaking in accordance with National Historic Preservation Act (NHP) Section 106 Implementing Regulations at 36 CFR 800.3(f). The Navy also plans to involve the public through newspaper notices and by seeking and considering public input in accordance with 36 CFR 800.2(d). The Navy shall consider all written requests of individuals and organizations to participate as consulting parties and, in consultation with the SHPO determine which should be consulting parties following 36 CFR 800.3(f)(3).

Should you or your staff have any questions or concerns, please contact Ms. Coral Rasmussen of our Cultural Resources Division at 808-472-1432 or email at coral.rasmussen@navy.mil.

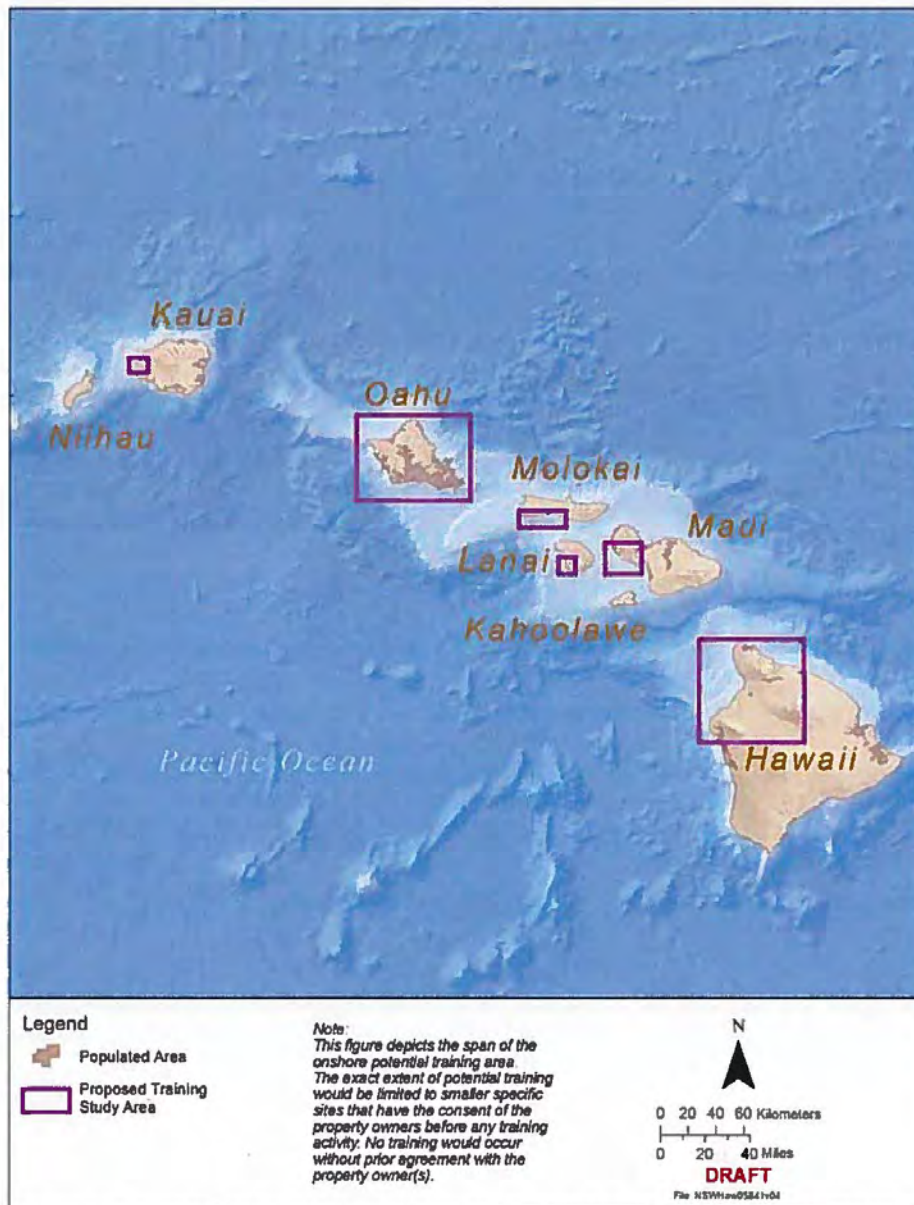
Sincerely,



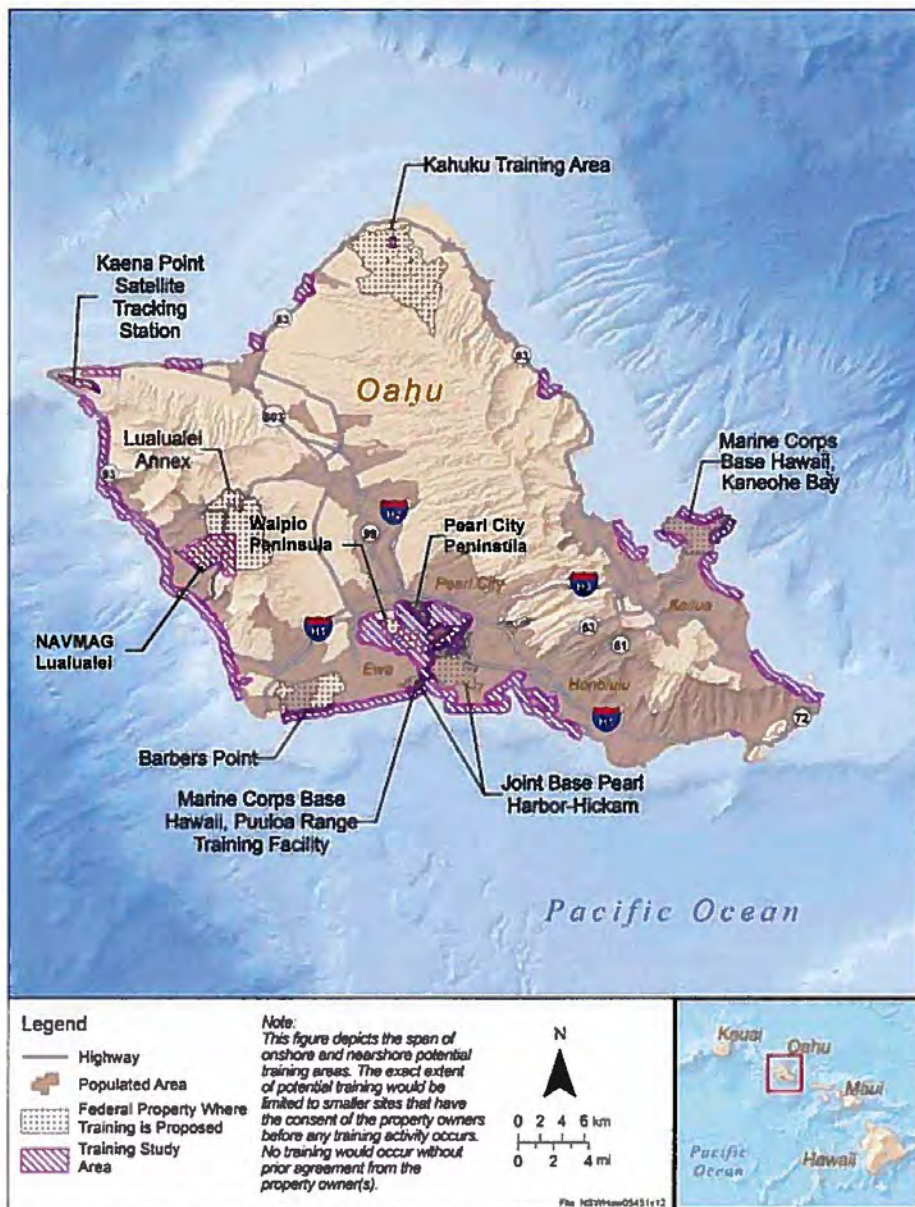
M. R. DELAO
Captain, CEC, U.S. Navy
Regional Engineer
By direction of the
Commander

5750
Ser N4/0595
August 22, 2018

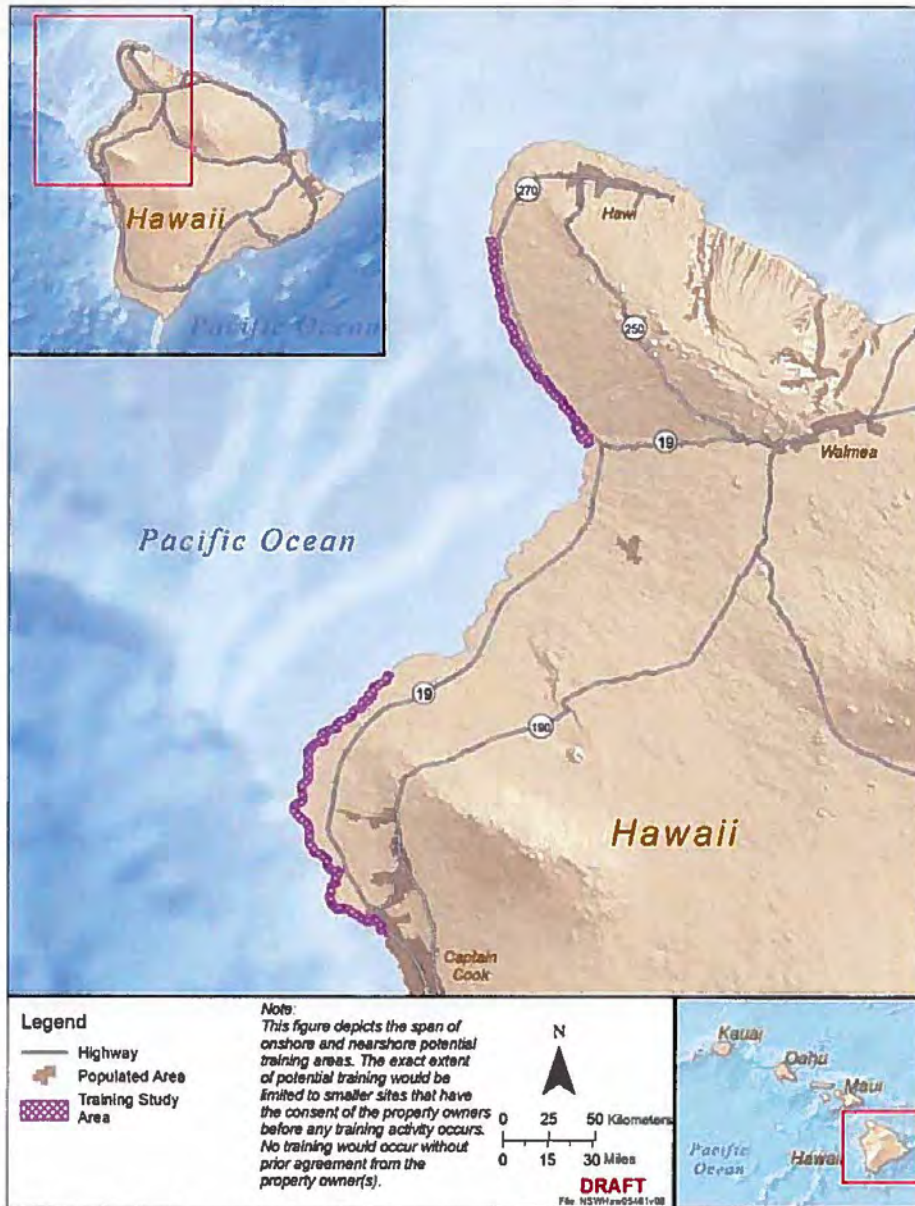
- Enclosures:
1. Location of Hawaiian Islands where Naval Special Operations Training is proposed.
 2. Proposed Oahu training areas.
 3. Proposed training area on the Island of Hawaii.
 4. Proposed training area in the waters off of Maui.
 5. Proposed training area in the water off of Lanai.
 6. Proposed training area in the water off of Molokai.
 7. Proposed Kauai training areas.
 8. Tax map keys (TMKs) where training is proposed.
 9. Proposed Naval Special Operations Training in Hawaii.
 10. Waipio Peninsula LZ/DZ proposed for vegetation clearing.
 11. Historic Properties Listed on the National Register of Historic Places (NRHP).
 12. Submerged resources in the Hawaiian Islands with verified locations.
 13. Buildings proposed for simulated building clearance.
 14. Aerial photo of Waipio Peninsula taken dated May 1944.
 15. Proposed Pearl City Peninsula Drop Zone and Landing Zone.
 16. Drop Zone proposed in area of former rice cultivation and Landing Zone in an area formerly a fishpond.
 17. Overview of the Pearl City Peninsula showing the Supply Center Provisions Annex warehouse in 1948.
 18. Ford Island in 1944 overlaid with locations of the proposed DZ/LZs.
 19. North end of Ford Island in 1959 showing the magazines and softball field in Location 1.
 20. Aerial imagery of Ford Island overlaid with locations of the proposed DZ/LZs.
 21. NAVMAG Lualualei showing location of proposed LZs.
 22. Ballfield at NAVMAG Lualualei proposed for use as an LZ.
 23. Paved intersection at NAVMAG Lualualei proposed for use as an LZ.
 24. Native Hawaiian organizations and historic partners that are concurrently being sent the letter initiating Section 106 consultation for the proposed Naval Special Operations Training in Hawaii.



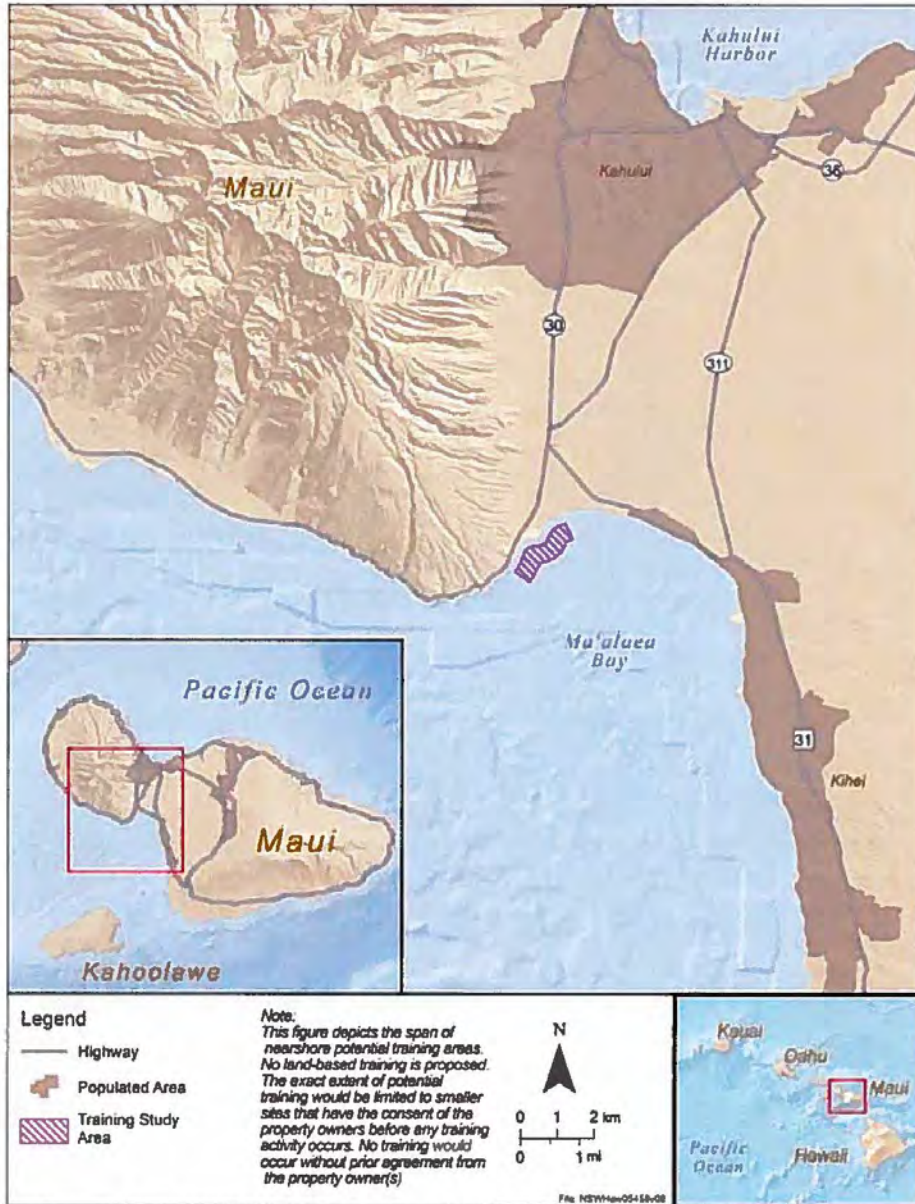
Enclosure 1. Location of Hawaiian Islands where Naval Special Operations Training is proposed.



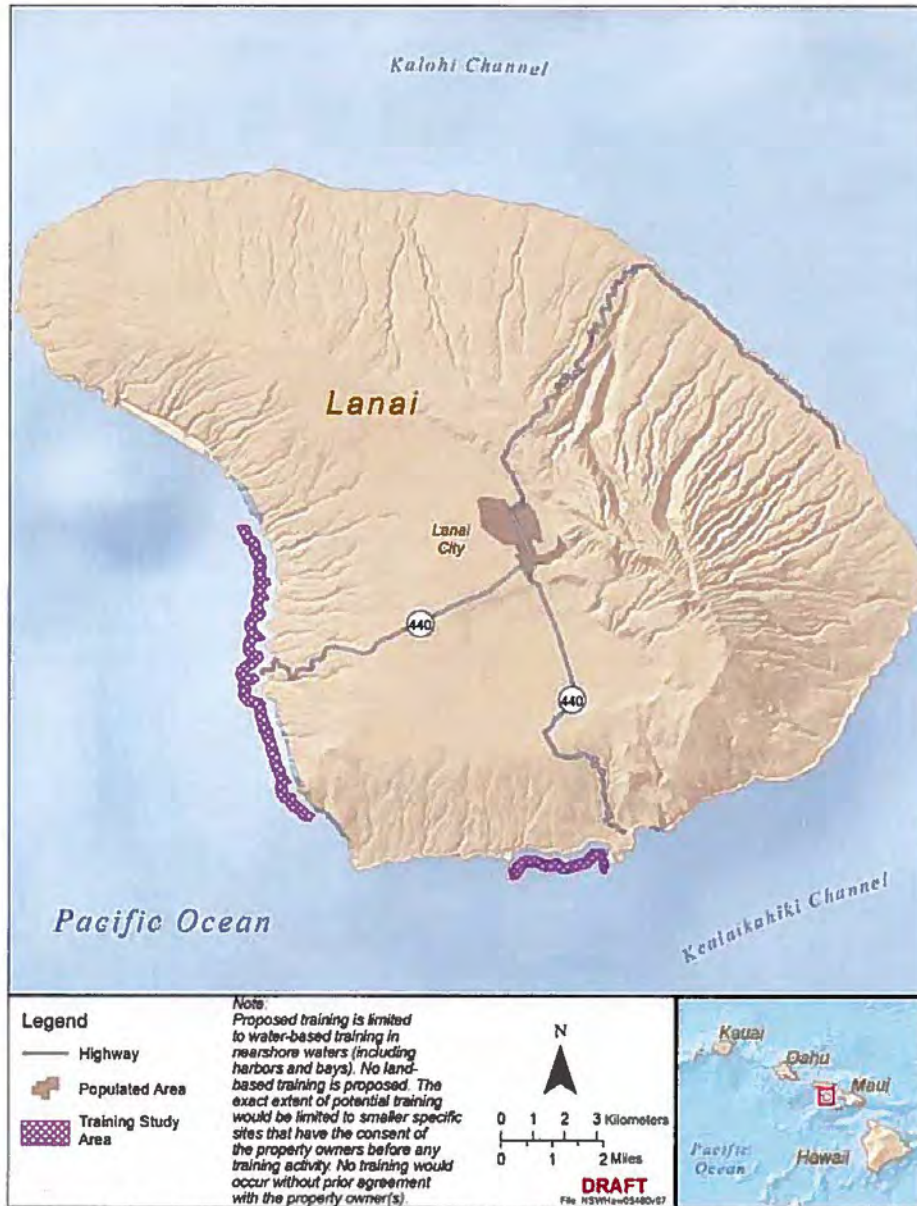
Enclosure 2. Proposed Oahu training areas shown in purple.



Enclosure 3. Proposed training area on the Island of Hawaii shown in purple.



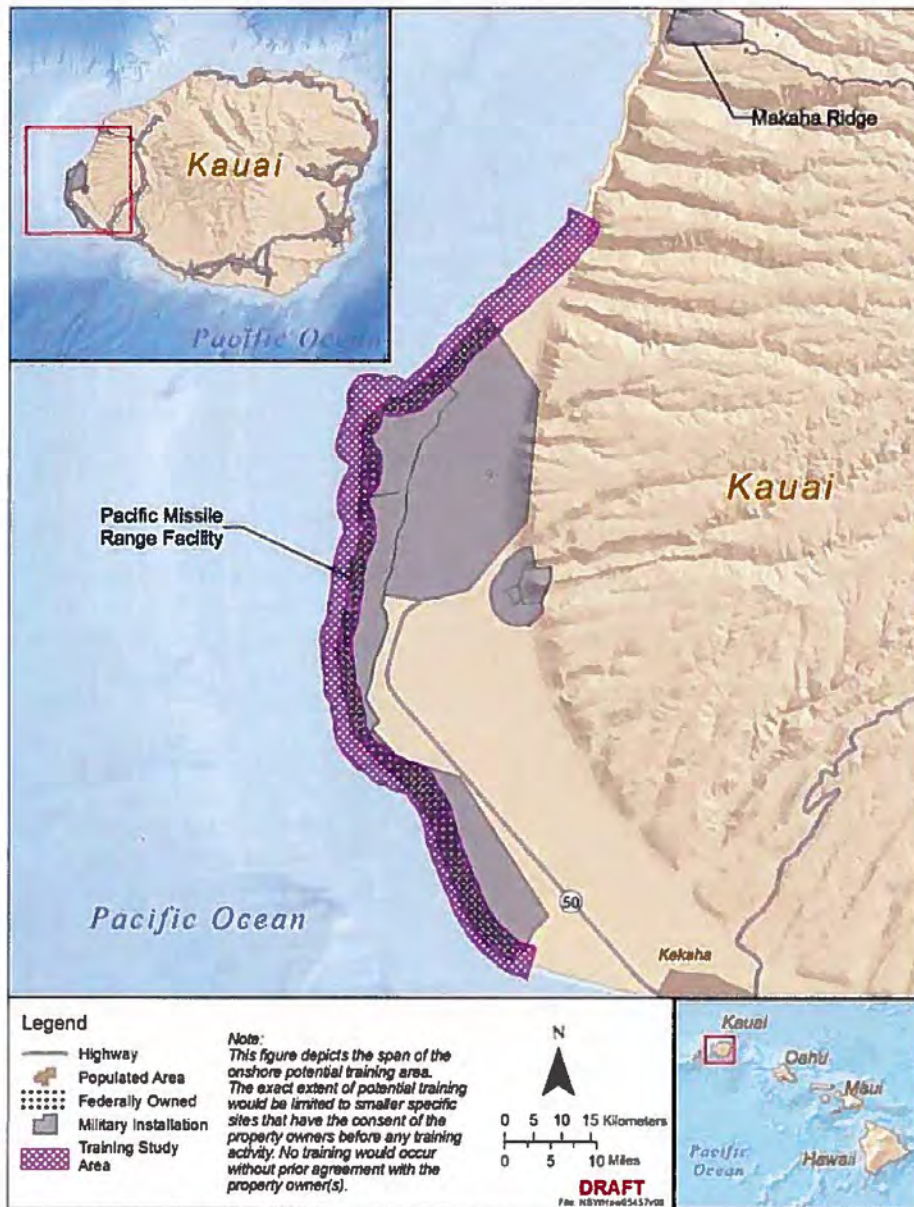
Enclosure 4. Proposed training areas in the waters off of Maui shown in purple.



Enclosure 5. Proposed training area in the water off of Lanai shown in purple.



Enclosure 6. Proposed training area in the water off of Molokai shown in purple.



Enclosure 7. Proposed Kauai training areas shown in purple.

18

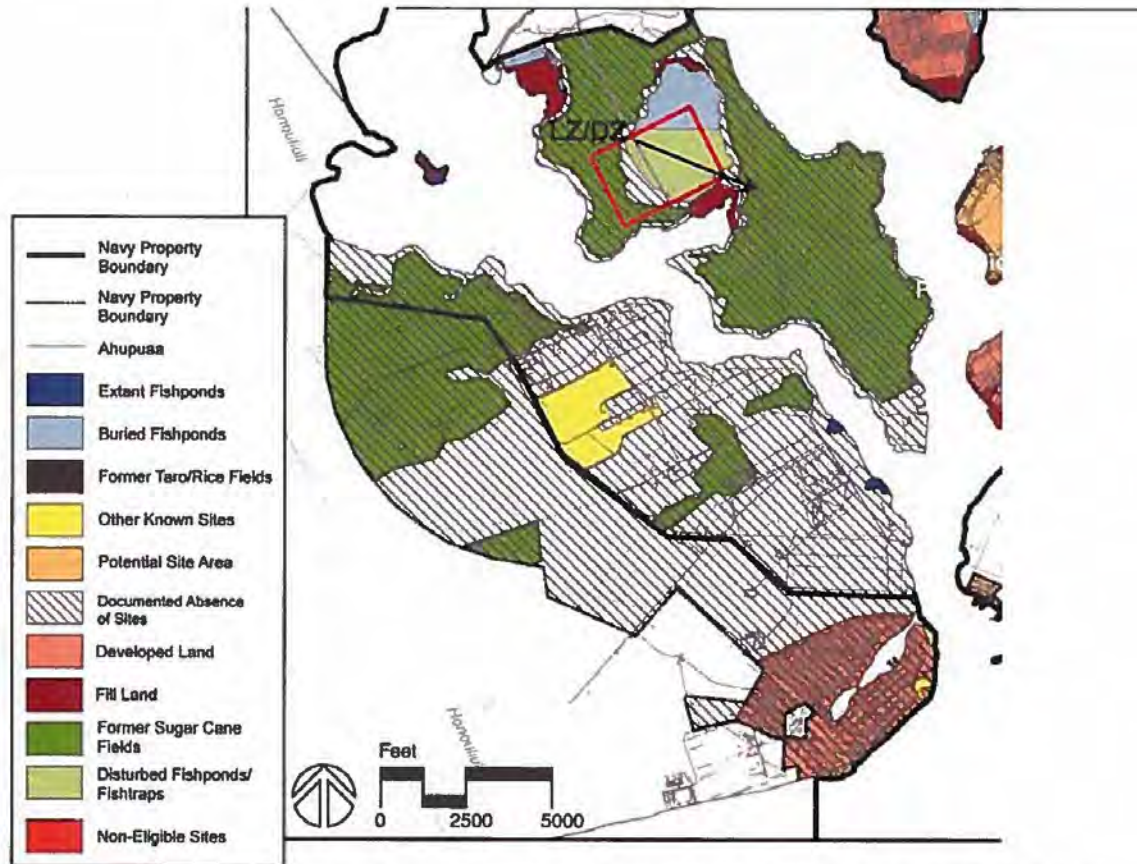
OAHU	(1)4-6-016	(1)8-6-015	(3)6-1-003
Windward	(1)4-6-019	(1)8-6-016	(3)6-1-004
(1)3-9-011	(1)4-6-022	(1)8-7-005	(3)6-2-002
(1)4-1-014		(1)8-7-006	
(1)4-1-001	NORTH SHORE	(1)8-7-007	Kona
(1)4-1-002	(1)5-9-004	(1)8-7-008	(3)7-2-004
(1)4-1-003	(1)6-1-001	(1)8-7-015	(3)7-2-005
(1)4-1-004	(1)6-1-013	(1)8-7-016	(3)7-2-010
(1)4-1-005	(1)6-2-001	(1)8-7-023	(3)7-2-017
(1)4-1-006	(1)6-2-002	(1)8-7-028	(3)7-2-019
(1)4-1-007	(1)6-8-003	(1)8-9-001	(3)7-2-040
(1)4-1-014	(1)6-8-006	(1)8-9-006	(3)7-3-009
(1)4-1-015	(1)6-8-011	(1)9-1-001	(3)7-3-043
(1)4-2-002	(1)6-9-001	(1)9-1-013	(3)7-3-063
(1)4-3-001		(1)9-1-014	(3)7-4-008
(1)4-3-003	LEEWARD	(1)9-1-015	(3)7-5-005
(1)4-3-004	(1)6-9-003	(1)9-1-017	(3)7-5-006
(1)4-3-005	(1)8-1-001	(1)9-1-056	(3)7-5-007
(1)4-3-006	(1)8-2-001	(1)9-1-057	(3)7-5-008
(1)4-3-007	(1)8-3-001	(1)9-2-049	(3)7-5-009
(1)4-3-008	(1)8-3-010	(1)9-3-001	
(1)4-3-009	(1)8-4-001	(1)9-3-002	KAUAI
(1)4-3-010	(1)8-4-002	(1)9-6-001	(4)1-2-001
(1)4-3-011	(1)8-4-004	(1)9-6-003	(4)1-2-002
(1)4-3-012	(1)8-4-005	(1)9-7-008	
(1)4-3-013	(1)8-4-006	(1)9-8-019	MOLOKAI
(1)4-3-015	(1)8-4-007	(1)9-9-001	(2)5-1-002
(1)4-3-016	(1)8-4-008	(1)9-9-003	(2)5-3-001
(1)4-3-017	(1)8-4-010		(2)5-4-002
(1)4-3-018	(1)8-4-012		
(1)4-3-019	(1)8-4-019		
(1)4-3-020	(1)8-4-030	HAWAII ISLAND	
(1)4-3-022	(1)8-5-001	North Kohala	
(1)4-3-083	(1)8-5-002	(3)5-7-001	
(1)4-4-008	(1)8-5-008	(3)5-7-003	
(1)4-4-039	(1)8-5-011	(3)5-8-001	
(1)4-5-001	(1)8-6-015	(3)5-9-003	
(1)4-6-005	(1)8-5-017	(3)5-9-016	
(1)4-6-007	(1)8-6-001	(3)5-9-017	
		(3)6-1-001	

Enclosure 8. Tax map keys (TMKs) where training is proposed.

Enclosure 9. Proposed Naval Special Operations Training in Hawaii.

Region	Training Locations	Activities
Joint Base Pearl Harbor-Hickam (Oahu)	Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Simulated Building Clearance ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Special reconnaissance ▪ Unmanned Aircraft Systems ▪ Landing zone/drop zone
Windward Region (Oahu)	Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Unmanned Aircraft Systems ▪ Landing zone/drop zone
	Non-Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery
North Region (Oahu)	Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Unmanned Aircraft Systems ▪ Landing zone/drop zone ▪ High angle climbing
	Non-Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery
South Region (Oahu)	Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Special reconnaissance ▪ Unmanned Aircraft Systems
	Non-Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Special reconnaissance
West Region (Oahu)	Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Simulated Building Clearance ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Special reconnaissance ▪ Unmanned Aircraft Systems ▪ Landing zone/drop zone
	Non-Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Special reconnaissance

Region	Training Locations	Activities
Hawaii	Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Special reconnaissance ▪ Unmanned Aircraft Systems
	Non-Federal	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Over The Beach ▪ Insertion/Extraction ▪ Launch/recovery ▪ Special reconnaissance
Kauai	Federal	<ul style="list-style-type: none"> ▪ Over The Beach ▪ Insertion/Extraction ▪ Special reconnaissance ▪ Unmanned Aircraft Systems
	Non-Federal	<ul style="list-style-type: none"> ▪ Over The Beach ▪ Insertion/Extraction ▪ Special reconnaissance
Maui	Nearshore Waters	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Insertion/Extraction ▪ Launch/recovery
Lanai	Nearshore Waters	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Insertion/Extraction ▪ Launch/recovery
Molokai	Nearshore Waters	<ul style="list-style-type: none"> ▪ Diver/Swimmer ▪ Insertion/Extraction ▪ Launch/recovery



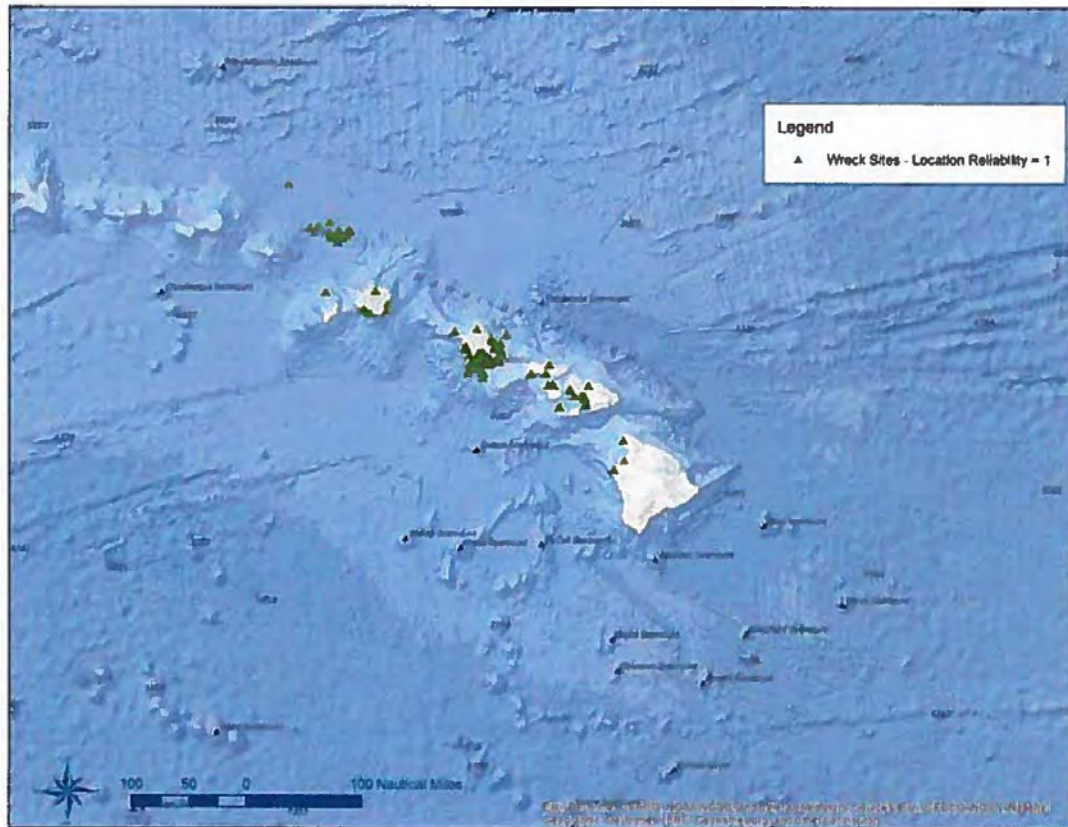
Enclosure 10. Waipio Peninsula LZ/DZ proposed for vegetation clearing (Oahu ICRMP 2008:4-21).

Enclosure 11. Historic Properties Listed on the National Register of Historic Places (NRHP).

NAME	ISLAND	DESCRIPTION
National Historic Landmark		
Falls of Clyde	Oahu	Four-masted, iron-hulled vessel docked at Pier 7 in Honolulu and is the world's only surviving ship of her type. She was built in 1878.
Hickam Field	Oahu	Established southeast of Pearl Harbor Naval Base and was one of the installations attacked on 7 December 1941.
Huilua Fishpond	Oahu	One of six remaining fishponds from an estimated 97 that once existed along the coast of Oahu; it illustrates the unique aquafarming practices of the Hawaiian people; located in Kahana Bay.
Kaneohe Naval Air Station	Oahu	One of the first installations attacked on 7 December 1941 and brought the United States into World War II.
United States Naval Base Pearl Harbor	Oahu	A large landlocked port that contributed to the rise of the United States as a major world power in the Pacific and for most of this century it has sheltered, armed, and repaired naval ships, submarines and aircraft. The attack on 7 December 1941 focused on Pearl Harbor.
Historic Districts listed on the NRHP		
Chinatown Historic District	Oahu	Consists of about 36 acres in the city of Honolulu and borders Honolulu Harbor and reflects a contiguous architectural and historic character of the early 20th century.
Kapapa Island Complex	Oahu	A traditional Hawaiian ceremonial site on an island in Kaneohe Bay.
Lapakahi Complex	Hawaii	Traditional Hawaiian village site.
Merchant Street Historic District	Oahu	An area within Honolulu that was once the financial and governmental part of the city and is what remains of "old" Honolulu.
Waianae District	Oahu	A traditional Hawaiian village site.

Built Historic Resources listed on the NHL		
Aloha Tower	Oahu	Aloha Tower at Pier 9, Honolulu Harbor is a 184 foot, 10-storied concrete tower that was completed in 1926. It became a symbol of Hawaii's investment in tourism and was the landmark of Honolulu's waterfront area.
Battery Hasbrouck at Ft. Kamehameha	Oahu	Constructed between 1909 and 1914. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.
Battery Hawkins at Ft. Kamehameha	Oahu	Constructed in 1914. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.
Battery Jackson at Ft. Kamehameha	Oahu	Constructed in 1914. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.
Battery Selfridge at Ft. Kamehameha	Oahu	Constructed between 1907 and 1913. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.
Hale Halawai O Holualoa	Hawaii	A meeting house constructed in the early 1850s on the north shore of Holualoa Bay.
Hulihee Palace	Hawaii	The former vacation home of Hawaiian royalty constructed in 1838 by John Adams Kuakini, the governor of the Island of Hawaii.
Moana Hotel	Oahu	Designed by the noted architect O.G. Traphagen and built in 1901; one of Honolulu's "high-rise" buildings and one of the oldest hotels in Waikiki, serving as a link to the development of the tourist industry.
Mokuaikaua Church	Hawaii	Church founded in 1829 along the North Kona coast.
U.S. Coast Guard Makapuu Light House	Oahu	The lighthouse has the largest lens of any lighthouse in the United States and its location on the island of Oahu is considered to be of vital importance to maritime commerce.
USS Arizona Memorial	Oahu	Constructed to recognize the valor of those who were attacked in Pearl Harbor, Oahu on 7 December 1941 and marks the resting place of the <i>USS Arizona</i> .
USS Arizona	Oahu	A U.S. Navy ship that sank during the Japanese attack on 7 December 1941 and rests at the bottom of Pearl Harbor, Oahu, and is a contributing element of the Pearl Harbor NHL.
USS Utah	Oahu	A U.S. Navy ship that sank during the Japanese attack on 7 December 1941 and rests at the bottom of Pearl Harbor, Oahu, and is a contributing element of the Pearl Harbor NHL.
World War I Memorial Natatorium	Oahu	Constructed in 1927 as a World War I memorial; an open air structure with an ocean-fed pool and Beaux-Arts inspired main entry on west side of Kapiolani Park.

Historic Objects listed on the NRHP		
USS <i>Bowfin</i>	Oahu	One of 15 remaining World War II Diesel Electric Submarines (American); currently moored in Pearl Harbor, Oahu.
USS <i>Missouri</i>	Oahu	Flagship of Adm. William F. Halsey; location of the signing of the surrender of Japan in Tokyo Bay on 2 September 1945; moored at Ford Island in Pearl Harbor, Oahu.
Archaeological Sites listed on the NRHP		
Heeia Fishpond	Oahu	A walled style fishpond in Kaneohe Bay; built about 600 to 800 years ago.
Kalaoa Permanent House	Hawaii	A traditional Hawaiian habitation site dating between the 1500s and 1800s.
Kiholo-Puako Trail or Ala Loa (long trail) Trail	Hawaii	A coastal trail in south Kohala on Hawaii Island that extends around the island from Kiholo Bay to Kalahuipaua near Puako.
Oahu Rail and Land (OR&L) Right of Way	Oahu	The OR&L Right of Way is 15 miles long; it is one of the longest stretches of narrow-gauge operable railroad track still in place in the United States.
Okiokilepe Pond	Oahu	A fishpond in West Loch at the entrance to Pearl Harbor, Oahu and is the only representation of the fishponds that were once in Pearl Harbor.



Enclosure 12. Submerged resources in the Hawaiian Islands with verified locations (from NOAA 2017:216).

Enclosure 13. Building Proposed for Simulated Building Clearance.

AREA	BUILDING/ STRUCTURE	DATE BUILT	ELIGIBILITY	CONTRIBUTING TO NHL	OTHER INFO
Ford Island	S359	1930	Eligible	Seaplane Ramp 3, Runway "C"	(research suggests built 1933)
	S360	1930	Eligible	Seaplane Ramp 4	(research suggests built 1922)
	55	1936	Eligible	Barracks, Enlisted Quarters E1/E4	
	1745	1941	Eligible	Army hangar, biplane	(research suggests built 1918)
	USS Missouri	1941	Listed	National Register of Historic Places #71000877; Hawaii Site 80-13-9817	
Hickam Honeymoon Beach	3564H	1941	Not Eligible	Ready Magazine	
	3567H	1941	Not Eligible	Storage, segregated Magazine	
Hickam Mobile Salvage Unit	54A	1941	Eligible	MOBDIVSALVU One OPS/HDQTRS Diver Change House	
Lualualei Naval Magazine	2	1933	Eligible	Security HQS Police Station, originally dispensary	
	2A	1945	Eligible	Security HQS Police Station, originally dispensary Records Room	
	4	1933	Eligible	Storehouse Heavy Metals, originally garage	
	442	1954	Not Eligible	Quality Evaluation Lab	
Lualualei Radio Transmitter	5A	1935	Eligible	Marine Barracks	
	6A	1938	Eligible	Enlisted Housing	
	7	1938	Eligible	Enlisted Housing	
	8B	1938	Eligible	Jr Officers Quarters	
	9A	1938	Eligible	Jr Officers Quarters	
	10A	1938	Eligible	Enlisted Housing	
	11	1938	Eligible	Enlisted Housing	
	12A	1938	Eligible	Enlisted Housing	
	22	1938	Eligible	Passenger Car Garage, detached	
	23	1938	Eligible	Passenger Car Garage, detached	
	24	1938	Eligible	Passenger Car Garage, detached	
	25A	1938	Eligible	Passenger Car Garage, detached	
68	1944	Eligible	Transmitter Building		

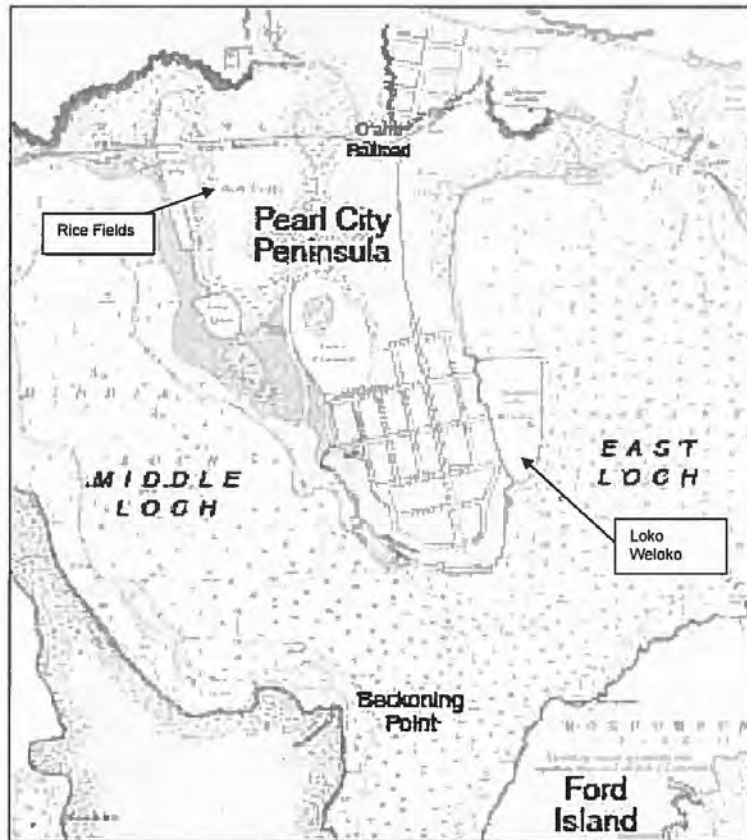
Pearl City Peninsula	987	2004	Not Eligible	SDVT-1 Headquarters Seal Team	
	989	2004	Not Eligible	Seal Team Bldg	
	995	1999	Not Eligible	Advanced Seal Del Sys Fac	
	1007	1999	Not Eligible	Landing Craft Ramp	
	1012	2013	Not Eligible	NSWG-3 Command & OPS Facility	
	1013	1999	Not Eligible	Small Craft Berth/Pier	
	1014	1999	Not Eligible	Small Craft Berth/Pier	
	1015	1999	Not Eligible	Small Craft Berth/Pier	
	1018	2007	Not Eligible	Dive Trailer (relocatable)	
	1019	2005	Not Eligible	Planner's Trailer (relocatable)	
Puuloa Demolition Range	546	2009	Not Eligible	EOD Boat Landing	
	547	1982	Not Eligible	Supply Warehouse Operational Storage	
Waipio Peninsula	41	1942	Not Eligible	WWII Degaussing Station- Operational Storage	
	S17	1942	Not Eligible	WWII Degaussing Station- Substation	
	S29	1942	Not Eligible	WWII Degaussing Station- Pier	
	S128	1942	Not Eligible	WWII Degaussing Station- Marine Railway Small Boats	



Enclosure 14. Aerial photo of Waipio Peninsula taken dated May 1944. Note limited development during World War II in prior sugarcane fields in area of proposed LZ/DZ.



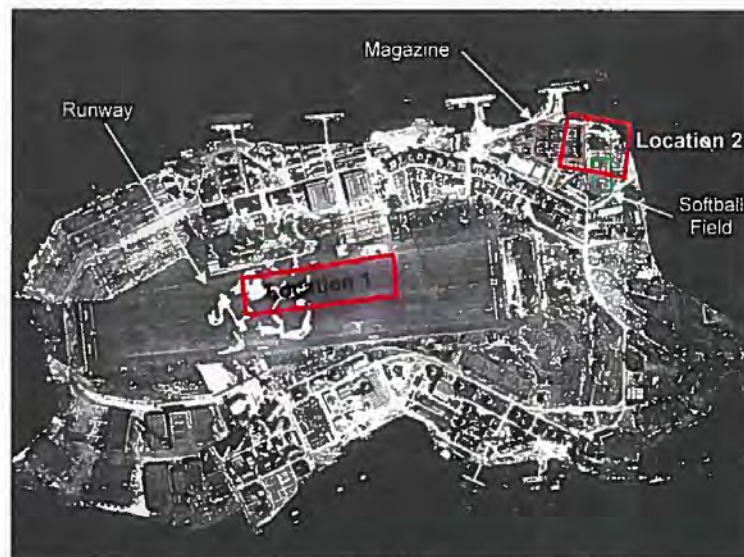
Enclosure 15. Proposed Pearl City Peninsula Drop Zone and Landing Zone (DZ/LZ).



Enclosure 16. Drop Zone (DZ) proposed in area of former rice cultivation and Landing Zone in an area formerly a fishpond (map derived from U.S. Navy "Pearl River and Lochs," from U.S.S. Bennington Survey 1897).



Enclosure 17. Overview of the Pearl City Peninsula showing the Supply Center Provisions Annex warehouse in 1948, view to Northwest.



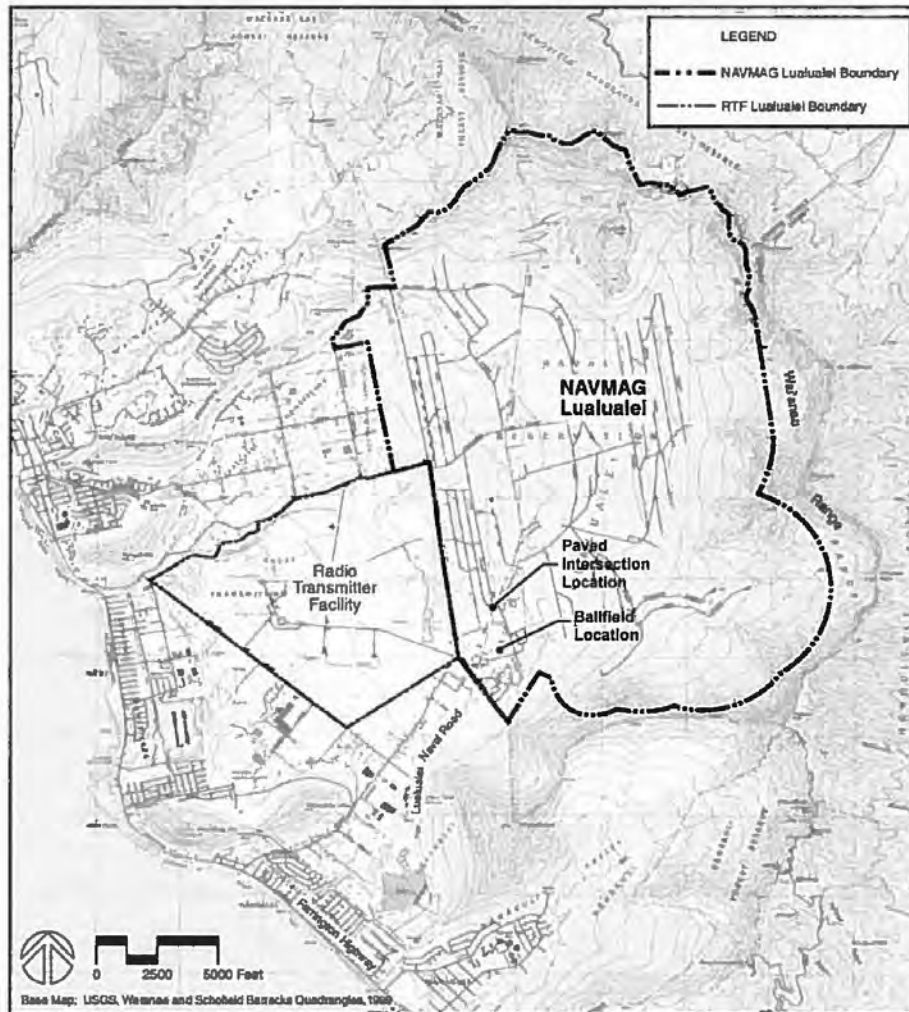
Enclosure 18. Ford Island in 1944 overlaid with locations of the proposed DZ/LZs.



Enclosure 19. North end of Ford Island in 1959 showing the magazines and softball field in Location 1.



Enclosure 20. Aerial imagery of Ford Island overlaid with locations of the proposed DZ/LZs.



Enclosure 21. NAVMAG Luualalei showing location of proposed LZs.



Enclosure 22. Ballfield at NAVMAG Lualualei proposed for use as an LZ.



Enclosure 23. Paved intersection at NAVMAG Lualualei proposed for use as an LZ.

Enclosure 24. Native Hawaiian organizations and historic partners that are concurrently being sent the letter initiating Section 106 consultation for the proposed Naval Special Operations Training in Hawaii.

Organization Name
Aha Kukaniloko Koa Mana
Ala Kahakai National Historic Trail
Alii Nui, Heiau O Na Alii
Aloha First
Association of Hawaiian Civic Clubs
Aukahi
Boyd 'Ohana
Ching Ohana
Diamond 'Ohana
Hawaii Council, Association of Hawaiian Civic Clubs
Hawaii's Thousand Friends
Hawaiian Civic Club of Waimea
Hawaiian Civic Club of Wahiawa
Hawaiian Civic Club of Waimanalo
Historic Hawaii Foundation
Ho'ohuli 'Ohana
Kahaulelio Ohana
Kahekilinui'ahumanu Ohana
Kahu Kahakai, Koa Mana, Kupuka'aina O Wai'anae Moku, O'ahu
Kaleilani Cáceres 'Ohana Huihui
Keaweamahi Ohana
Kekoolani Ohana
Kekumano 'Ohana
Ko'a Mana
Koolauloa Hawaiian Civic Club
Ko'olaupoko Hawaiian Civic Club
Kuali'i Ohana
Linda Kaleo Paik Ohana
Mainland Council Association of Hawaiian Civic Clubs
Makaha Hawaiian Civic Club
Mahu Ohana
Naihe Ohana
Na Ohana Papa O Mana
National Park Service
Oahu Council of Hawaiian Civic Clubs
Office of Hawaiian Affairs
Office of the Ali'i 'Aimoku, Royal Order of Kamehameha I, Heiau o Māmalahoa
Olds 'Ohana
Ortiz 'Ohana
Paguyo 'Ohana
Pacific Justice and Reconciliation Center
Papa, Richard Likeke, Jr.
Prince Kuhio Hawaiian Civic Club
Pu'uhoonua O Waimanalo Neighborhood Board
Quitevis Ohana

Royal Order of Kamehameha: Moku o Mamalahoa Moku o Kohala Moku o Kona Moku o Puna
Saffery Ohana
Souza Ohana
Temple of Lono
The I'Mua Group
Waianae Hawaiian Civic Club
Waimanalo Neighborhood Board
Waimea Hawaiian Civic Club

A.3.2 Hawaii State Historic Preservation Division (SHPD) Response to 22 August 2018 Letter from Department of the Navy (25Sep18)



DAVID Y. IGE
GOVERNOR OF
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

September 25, 2018

Captain M. R. Delao
Regional Engineer
Department of the Navy
Commander Navy Region Hawai'i
850 Ticonderoga St., Ste 110
JBPBH, Hawai'i 96860-5101

IN REPLY REFER TO:
Log No.: 2018.02000
Doc. No.: 1809SH20
Archaeology

Dear Captain Delao:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –
Consultation for Proposed Naval Special Operations Training in Hawai'i
Ref. No. 5750 Ser N4/0595
Various Ahupua'a, Various Districts, Statewide**

**TMK: Oahu: (1) 3-9-011, (1) 4-1-014, (1) 4-1-001, (1) 4-1-002, (1) 4-1-003, (1) 4-1-004, (1) 4-1-005, (1) 4-1-006, (1) 4-1-007, (1) 4-1-014, (1) 4-1-015, (1) 4-2-002, (1) 4-3-001, (1) 4-3-003, (1) 4-3-004, (1) 4-3-005, (1) 4-3-006, (1) 4-3-007, (1) 4-3-008, (1) 4-3-009, (1) 4-3-010, (1) 4-3-011, (1) 4-3-012, (1) 4-3-013, (1) 4-3-015, (1) 4-3-016, (1) 4-3-017, (1) 4-3-018, (1) 4-3-019, (1) 4-3-020, (1) 4-3-022, (1) 4-3-083, (1) 4-4-008, (1) 4-4-039, (1) 4-5-001, (1) 4-6-005, (1) 4-6-007, (1) 4-6-016, (1) 4-6-019, (1) 4-6-022, (1) 5-9-004, (1) 6-1-001, (1) 6-1-013, (1) 6-2-001, (1) 6-2-002, (1) 6-8-003, (1) 6-8-006, (1) 6-8-011, (1) 6-9-001, (1) 6-9-003, (1) 8-1-001, (1) 8-2-001, (1) 8-3-001, (1) 8-3-010, (1) 8-4-001, (1) 8-4-002, (1) 8-4-004, (1) 8-4-005, (1) 8-4-006, (1) 8-4-007, (1) 8-4-008, (1) 8-4-010, (1) 8-4-012, (1) 8-4-019, (1) 8-4-030, (1) 8-5-001, (1) 8-5-002, (1) 8-5-008, (1) 8-5-011, (1) 8-6-015, (1) 8-5-017, (1) 8-6-001, (1) 8-6-015, (1) 8-6-016, (1) 8-7-005, (1) 8-7-006, (1) 8-7-007, (1) 8-7-008, (1) 8-7-015, (1) 8-7-016, (1) 8-7-023, (1) 8-7-028, (1) 8-9-001, (1) 8-9-006, (1) 9-1-001, (1) 9-1-013, (1) 9-1-014, (1) 9-1-015, (1) 9-1-017, (1) 9-1-056, (1) 9-1-057, (1) 9-2-049, (1) 9-3-001, (1) 9-3-002, (1) 9-6-001, (1) 9-6-003, (1) 9-7-008, (1) 9-8-019, (1) 9-9-001, (1) 9-9-003
Moloka'i: (2) 5-1-002, (2) 5-3-001, (2) 5-4-002
Hawai'i: (3) 5-7-001, (3) 5-7-003, (3) 5-8-001, (3) 5-9-003, (3) 5-9-016, (3) 5-9-017, (3) 6-1-001, (3) 6-1-003, (3) 6-1-004, (3) 6-2-002, (3) 7-2-004, (3) 7-2-005, (3) 7-2-010, (3) 7-2-017, (3) 7-2-019, (3) 7-2-040, (3) 7-3-009, (3) 7-3-043, (3) 7-3-063, (3) 7-4-008, (3) 7-5-005, (3) 7-5-006, (3) 7-5-007, (3) 7-5-008, (3) 7-5-009
Kaua'i: (4) 1-2-001, (4) 1-2-002**

The State Historic Preservation Division (SHPD) received a letter dated August 22, 2018 from the Department of the Navy (Navy) to initiate consultation for Proposed Naval Special Operations Training in Hawai'i. The State Historic Preservation Division (SHPD) received this submittal on August 27, 2018.

The Navy has determined the proposed project is an undertaking as defined in 36 CFR 800.16(y). The proposed undertaking will consist of small unit intermediate and advanced land, maritime, and air training activities for Naval Special Operations personnel in nearshore waters and land-based areas on the islands of O'ahu, Hawai'i, and Kaua'i and water-based training in nearshore waters (including harbors and bays) of Maui, Moloka'i, and Lana'i. The training will include small-unit land, maritime, and air training activities for purposes of teaching trainees the skills

Captain M. R. Delao
September 25, 2018
Page 2

to remain undetected and to leave no trace of their presence during or after the training activity. The training activities fit into three categories: land-based training, water-based training, and air-based training.

The area of potential effect (APE) is defined as the footprint of the Naval Special Operations training area in the state of Hawai'i, described in greater detail and illustrated on maps in the Navy's consultation letter.

The proposed training activities for Naval Special Operations will take place within the Hawaiian Islands. The majority of training will occur in public harbors and beach parks where no historic properties are present, although some of the areas contain historic properties where the proposed training will occur.

The Navy has identified 852 historic properties within the APE. This includes 580 on the island of O'ahu, 182 on the island of Hawai'i, 80 on the island of Kaua'i, 4 on the island of Maui, and 6 on the island of Moloka'i. Of the 852 historic properties identified, 49 are submerged. The training areas for Maui, Moloka'i, and Lana'i are in the water and contain only submerged historic properties. The islands of O'ahu and Hawai'i also include submerged historic properties, while the island of Kaua'i does not.

Per 36 CFR 800.3, thank you for initiating Section 106 consultation with the Hawai'i State Historic Preservation Officer (SHPO); the SHPD looks forward to continuing the Section 106 process for the proposed project.

The Navy is the office of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at Stephanie.Hacker@hawaii.gov or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha
Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Coral Rasmussen, Navy (coral.rasmussen@navy.mil)

A.3.3 Department of the Navy Response to 25 September 2018 Letter from the Hawaii SHPO (22Mar19)

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

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22 MAR 2019

CERTIFIED NO: 7016 0910 0001 0891 6669

Dr. Alan Downer
Deputy State Historic Preservation Officer
Department of Land and Natural Resources
Kakuhihewa Building, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

Dear Dr. Downer:

**SUBJECT: NATIONAL HISTORIC PRESERVATION ACT, SECTION 106 REVIEW:
PROPOSED NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII**

In accordance with 36 CFR Part 800, the United States (U.S.) Department of the Navy (Navy) is continuing National Historic Preservation Act (NHPA) Section 106 consultation regarding a proposal for the Naval Special Warfare Command (NSWC) to conduct land, maritime, and air-based training activities in the State of Hawaii. The Navy sent National Historic Preservation Act (NHPA) Section 106 correspondence to the Hawaii State Historic Preservation Officer (SHPO) dated August 22, 2018 (Ser N4/0595) initiating Section 106 consultation. The SHPO responded with a letter thanking the Navy for initiating consultation dated September 25, 2018 (Log No.: 2018.02000/Doc. No.: 1809SH20).

DESCRIPTION OF UNDERTAKING

The proposed training activities for Naval Special Operations will take place within the Hawaiian Islands. The proposed undertaking includes small unit (generally 4-12 personnel) teams participating in land, maritime, and air training activities in nearshore waters and land-based areas on Oahu, Hawaii Island, and Kauai; and water-based training in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai [enclosures 1 to 7] for purposes of teaching trainees the skills to remain undetected (silent and unseen) and to leave no traces of their presence during or after the training activity. The undertaking does not include construction activities. Detailed information regarding the proposed training is included in enclosure 8 pursuant to 36 CFR 800.11(d)(1).

AREA OF POTENTIAL EFFECT

Pursuant to 36 CFR 800.4(a)(1), the Navy established an area of potential effect (APE) to identify historic properties in the study area. The APE is defined as the proposed training study area in the Hawaiian Islands as depicted in enclosures 2 to 7 (§800.11(d)(1)). The training will be

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conducted in selected coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii; the APE is larger than the actual area that would be used for the proposed training due to the training's sensitivities and would be limited to smaller sites on federal land and on state and private lands that have the consent of property owners before training activity occurs.

IDENTIFICATION OF HISTORIC PROPERTIES

The training is proposed for both federal and non-federal lands. All training events on non-federal land would be conducted in accordance with real estate agreements and other authorizations, including those that may be subject to Hawaii Regulations 6E by the landowners. The Navy would coordinate with land managers (where applicable), and property owners prior to use of property for training. Proposed training on non-federal sites would be for 10 or fewer events per year, the majority of which will occur in public harbors and beach parks.

A table is provided in Enclosure 9 that includes historic properties identified within the APE on both federal and non-federal sites per §800.11(d)(2). The table also contains information on cultural resources on non-federal properties that have not had formal evaluations conducted; for the purpose of this undertaking, the cultural resources in the table are assumed eligible for listing on the NRHP. The table of historic properties was compiled from the database and archaeological reports at the State Historic Preservation Division (SHPD), research at the Hawaii State Library, and review of reports pertaining to military installations in the APE. Enclosure 10 includes a list of these references.

The Navy made a reasonable and good faith effort to carry out appropriate identification efforts, taking into account past planning, research and studies, and the magnitude and nature of the undertaking, the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects per §800.4(b)(1). The Navy also reached out to Native Hawaiian organizations (NHO) identified pursuant to §800.3(f) that were identified through lists of NHO compiled by the DOI, the Navy, the Army, and the Marine Corps. In addition, the Navy published a notice in local newspapers (Honolulu Star Advertiser, West Hawaii Today and Maui News for three consecutive days, beginning Thursday, November 08, 2018), seeking members of the Public who wished to participate as consulting parties in the NHPA Section 106 process associated with the undertaking per §800.2(d). Following release of the draft environmental assessment (DEA), additional NHOs and members of the public have provided input. NHOs and the public that are consulting on the proposed undertaking are included in enclosure 11.

Information received from NHOs and members of the public indicate a concern whether historic properties were identified and if they would be adversely affected. As indicated above, the APE is much larger than the area where the NSWC will be training. This allows for avoidance of historic properties that could be affected if training were to occur at the site, such as

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ancient habitation sites, religious sites, and burial sites. The table in enclosure 9 indicates which historic properties have been identified and whether they will be avoided or if training were to occur if the characteristic that qualify it for inclusion in or eligibility for the NRHP will be altered. The NSWC will avoid historic properties where training would potentially affect the characteristic that qualify it for inclusion in or eligibility for the NRHP.

Concern was raised regarding proposed high angle training on the island of Hawaii between Mahukona and Kawaihae since the cliffs in this area are friable and erosion could damage coastal trails. The NSWC high angle training is not proposing to conduct high angle climbing along these cliffs.

There is also a concern that unknown sites and sites that are eligible but not listed in the NRHP are vulnerable and risk damage or destruction by Naval training activities. The Navy has identified numerous traditional Hawaiian archaeological sites, historic-period sites, and historic buildings along the shore of the Hawaiian Islands that are not listed in the NRHP and plans to avoid those whose defining characteristics could potentially be altered if training were to occur. Some historic properties, such as the Pearl Harbor NHL, will not be affected by the training (see below and enclosure 9). In the unlikely event that historic properties are discovered or unanticipated effects on historic properties found after completion of the Section 106 process, the Navy shall follow post review discovery procedures as outlined in §800.13(b), which stipulates that the Navy shall make reasonable efforts to avoid, minimize or mitigate adverse effects to such properties.

In addition to historic properties, many of the comments received indicate that people object to the training activities proposed by the NSWC and to the expansion of the military's footprint across the Hawaiian Islands, pointing out that the presence of the Navy on Native Hawaiian culture and community is disruptive, and that the Native Hawaiians are tied to the environment. Native Hawaiians also have indicated that the ocean and waterways around the Hawaiian Islands are sacred and play an important role in their practices and beliefs. The Navy applied the National Register criteria to potential properties. However, the cultural aspects of the ocean and waterways within the APE cannot be evaluated since the information acquired through consultation and research is inadequate to qualify them as potential historic properties as defined in the National Register's Criteria for Evaluation (36 CFR §60.4). Areas of significance do exist within waters surrounding the Hawaiian Islands, such as sources of healing waters (ko'a) or the many divine manifestations of Kanaloa; however, information regarding these resources and their locations are secret.

Historic properties identified within the APE are provided in enclosure 9 along with brief descriptions, and the effects of the undertaking on historic properties. Most of these historic properties within the APE will be avoided since the training is limited to areas smaller than depicted within the boundaries of the APE. Enclosure 9 indicates which historic properties may be included in training. These include Pearl Harbor National Historic Landmark (NHL), which

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includes the Main Base, Ford Island, portions of Pearl City Peninsula, Waipio Peninsula, and portions of West Loch Annex. Within Pearl Harbor NHL there are three individually listed NHLs; the USS *Utah*, USS *Arizona*, and the USS *Bowfin*. Training is not proposed for the USS *Utah*, the USS *Arizona*, and the USS *Bowfin*.

Training is proposed for the USS *Missouri* (also known as the “Mighty Mo”), which is a World War II battleship listed in the National Register. Training would consist of simulated building clearance during which trainees operate in small units and move into a structure where they would conduct clearance from room to room. The intent is for trainees to remain concealed and silent, departing the area while avoiding detection with minimal disturbance. Combat scenarios involve the use of simulated weapons and simulated munitions, which fire marking rounds that have little energy or force and are designed not to pit walls or go through windows or wood; there is no power in the round itself. Water-soluble paint pellets used in simulated munitions consist of biodegradable, environmentally-friendly, colored paste-filled tips that leave a small color that washes off with soap and water. No property damage would occur and cleanup (picking up simulated marking rounds/washing away paint marks if present) would be handled by instructors and support staff immediately at the conclusion of the training scenario.

Simulated building clearance is also proposed for historic properties on Joint Base Pearl Harbor Hickam, including Facilities S359 and S360 (seaplane ramps built in 1930), Facility 55 (1936 era barracks), and Facility 1745 (an Army bi-plane hangar built in 1941) on Ford Island. The intent is for trainees to remain concealed and silent, departing the area while avoiding detection with minimal disturbance (see description for USS *Missouri* simulated building clearance). Combat scenarios involve the use of simulated weapons and simulated munitions and no property damage would occur; cleanup (picking up simulated marking rounds/washing away paint marks if present) would be handled by instructors and support staff immediately at the conclusion of the training scenario.

A proposed drop zone (DZ) and proposed landing zone (LZ) are located on Ford Island, which is also within the Pearl Harbor NHL. Neither location would require development such as vegetation clearing or ground disturbance. Location 1 is a proposed LZ near the center of the island on the former runway surface. It is currently overgrown with grass. Location 2 is a DZ¹ on the north end of the island in a grass field north of the Navy Lodge. This area was filled during World War II for development of a magazine complex and a softball field.

Special Reconnaissance training is proposed within the Fort Kamehameha Historic district near the eight historic buildings that are part of the Fort Kamehameha Historic Housing, which were constructed in 1916. These structures are currently vacant and used as supply and equipment sheds (Facilities 3342H to 3349H). They were vacated due to their location below the aircraft flight path. The training would hike to a designated observation point where they would

¹ Drop zones or DZs do not include landing of the aircraft.

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remain undetected for a period of time with the goal of leaving no trace behind. Trainees would not enter the historic houses.

Training is also proposed at the Lualualei Naval Magazine and Lualualei Radio Transmitter Facility. It includes simulated building clearance within historic facilities. Of all the facilities, only Facility 4 (now used as a storehouse/garage) at Lualualei Naval Magazine is still occupied. Historic buildings at Lualualei Naval Magazine include 2 and 2A (constructed in 1933 as a dispensary), Facilities 3 (constructed in 1932 as enlisted men's quarters), and Facility 4 (constructed in 1933 as a dispensary records room). Historic buildings at Lualualei Radio Transmitter Facility include: Facility 5A (built in 1935 as Marine barracks), Facilities 6, 7, 10, 11, and 12 (built in 1937 as enlisted housing); Facilities 8 and 9 (built in 1937 as Jr. Officers' Quarters); Officers Quarters and their associated garages (A, A1, C, C1 built in 1935; B and B1 built in 1938), Facilities 22, 23, 24, 25A, detached passenger car garages built in 1937, and Facility 68 (constructed in 1944 as a transmitter building). No property damage would occur and cleanup (picking up simulated marking rounds/washing away paint marks if present) would be handled by instructors and support staff immediately at the conclusion of the training scenario.

Training is proposed at Marine Corps Base Hawaii (MCBH), Kaneohe Bay. Diver/swimmer training is proposed in the waters south of the airfield, which are within the boundaries of the Kaneohe Naval Air Station (NAS) NHL. The NHL includes the five seaplane ramps that extend into the water as well as historic hangars and the parking apron located on the land. The diver/swimmer training will not include areas on land (hangars and parking apron). A sunken flying boat or PBY Catalina is located in the mud at the bottom of Kaneohe Bay south of the NHL. It was sunk during the Japanese attack on Kaneohe NAS on December 7, 1941. The flying boat is eligible for listing in the National Register. In addition, diver/swimmer training is proposed for the waters around the historic fuel pier (Facility located east of the Kaneohe NAS NHL). Diver/swimmer training is proposed for the waters off the north shore of MCBH. A submerged P-40 Warhawk aircraft is located in the waters near Pyramid Rock Beach. It crashed during a maintenance flight near the end of World War II. Generally, the plane is buried below the sand and only occasionally are the propeller and cockpit visible. The submerged plane will be avoided and therefore not be affected by the proposed diver/swimmer training. No submerged cultural resources have been identified in the waters along the east side of MCBH Kaneohe Bay. This area is near the Fort Hase archaeological site, which is currently eroding into the ocean. The diver/swimmer training will avoid the area adjacent to the Fort Hase archaeological site, which is off-limits to training.

Training is also proposed at the Haleiwa Beach Park to include diver/swimmer training and over-the-beach training. The trainees would swim or dive to the beach, exit the water, cross the beach, and quietly transition to land where they would remain out of sight for several hours before exiting the park. The NSWCC also proposes to utilize the Haleiwa boat ramp to launch their submersible. Haleiwa Beach Park is listed on the State Register and is eligible for listing on the National Register. It is part of the Art Deco Parks and Playgrounds multiple property listing along

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with Ala Moana Beach Park. The beach park is significant for its association with the development of parks in the City and County of Honolulu in the 1930s and reflects the work of Harry Sims Bent, one of the more prominent architects in Hawaii. The training is limited to the waters, beach, and park. The only structure the Navy proposes to use is the boat ramp to launch and recover their watercraft.

The Navy also proposes to conduct diver/swimmer and over-the-beach training at Ala Moana Beach Park. Activities at Ala Moana Beach Park would be similar to that at Haleiwa Beach Park. The trainees would swim or dive to the beach, exit the water, cross the beach, and quietly transition to land where they would remain out of sight for several hours before exiting the park. This beach park is listed on the Hawaii State Register and is eligible for listing on the National Register. It was constructed in 1934 on former swamp land. The beach was created in 1954. The beach park is significant for its association with the development of parks in the City and County of Honolulu in the 1930s and reflects the work of Harry Sims Bent, one of the more prominent architects in Hawaii. The proposed NSWC training does not include training in the historic structures associated with the park.

In addition, the Navy proposes to train at Mahukona Beach Park, which is located at the site of the former commercial harbor run by the Kohala Sugar Company; many of its features are eligible for listing in the NRHP. The wreck of the *Kauai*, a screw steamship that sank in 1913, is located in the waters of the harbor. The trainees would practice insertion/extraction, swim or dive to the beach, exit the water, cross the beach, and quietly transition to land where they would remain out of sight for several hours before exiting the park. They will not be climbing over the historic features. In addition, they will avoid the wreck of the *Kauai* at the bottom of Mahukona Harbor.

Training also includes the coast of the Pacific Missile Range (PMRF) on Kauai. The Navy proposes to conduct insertion/extraction training in the water, over the beach training, and special reconnaissance training. Three traditional Hawaiian habitation sites and a burial site are located within the area proposed for over the beach training. These areas are marked and will be avoided during training. A rock image is purported to be located off the shore; however, its location is unknown. A historic concrete fuel tank and concrete box are also located within the over the beach training. The area proposed for reconnaissance training contains historic properties including a traditional Hawaiian habitation site, burial site, a historic road barricade complex, and two aircraft revetments. The traditional Hawaiian sites (habitation and burial site) will be avoided. Training may occur around the road barricade complex and aircraft revetments.

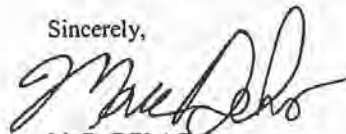
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FINDING OF EFFECT

Pursuant to 36 CFR §800.4(b)(1), the Navy took into account past planning, research and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the APE. As a result of our research and analysis, the Navy has determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with the NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1) since the Navy finds that there are historic properties present but the undertaking will have no effect upon them as defined in §800.16(i) based on the following pursuant to §800.11(d)(3): 1) the NSWC small unit teams will be undetected (silent and unseen) during training and leave no traces of their presence during or after the training activity; 2) the undertaking does not include construction; 3) the training will avoid most historic properties; and 4) historic properties where training is proposed will not alter the characteristics of the historic property qualifying it for inclusion in or eligibility for the National Register and include Pearl Harbor NHL, which includes the Main Base, Ford Island, portions of Pearl City Peninsula, Waipio Peninsula, and portions of West Loch Annex, and the USS *Missouri*; the Fort Kamehameha Historic District; at historic buildings, Lualualei Naval Magazine and Lualualei Radio Transmitter Facility; at the Kaneohe NAS NHL; at Haleiwa Beach Park; at Ala Moana Beach Park; and at Mahukona Beach Park; and around World War II era historic properties at PMRF on Kauai. If Native American Graves Protection and Repatriation Act (NAGPRA) cultural items are discovered, all training in the vicinity will stop and the remains will be stabilized and protected. Treatment will proceed under the authority of NAGPRA.

We request your review and concurrence within 30 days of receipt of this letter. As defined in 36 CFR 800.4(i) we will assume your concurrence if no objection is received from your office within 30 days of receipt of this letter. The Navy is forwarding a copy of this letter to additional consulting parties listed below as part of the Section 106 consultation process for this proposed undertaking. Thus, the Navy requests comments from these consulting parties, listed below regarding the aforementioned determinations within 30 days of receipt of this letter. Should you or your staff have any questions or concerns please contact Mr. Jeff Pantaleo of NAVFAC Hawaii's Environmental Planning Division at 808-471-1171 Ext 368 or email at jeff.pantaleo@navy.mil.

Sincerely,

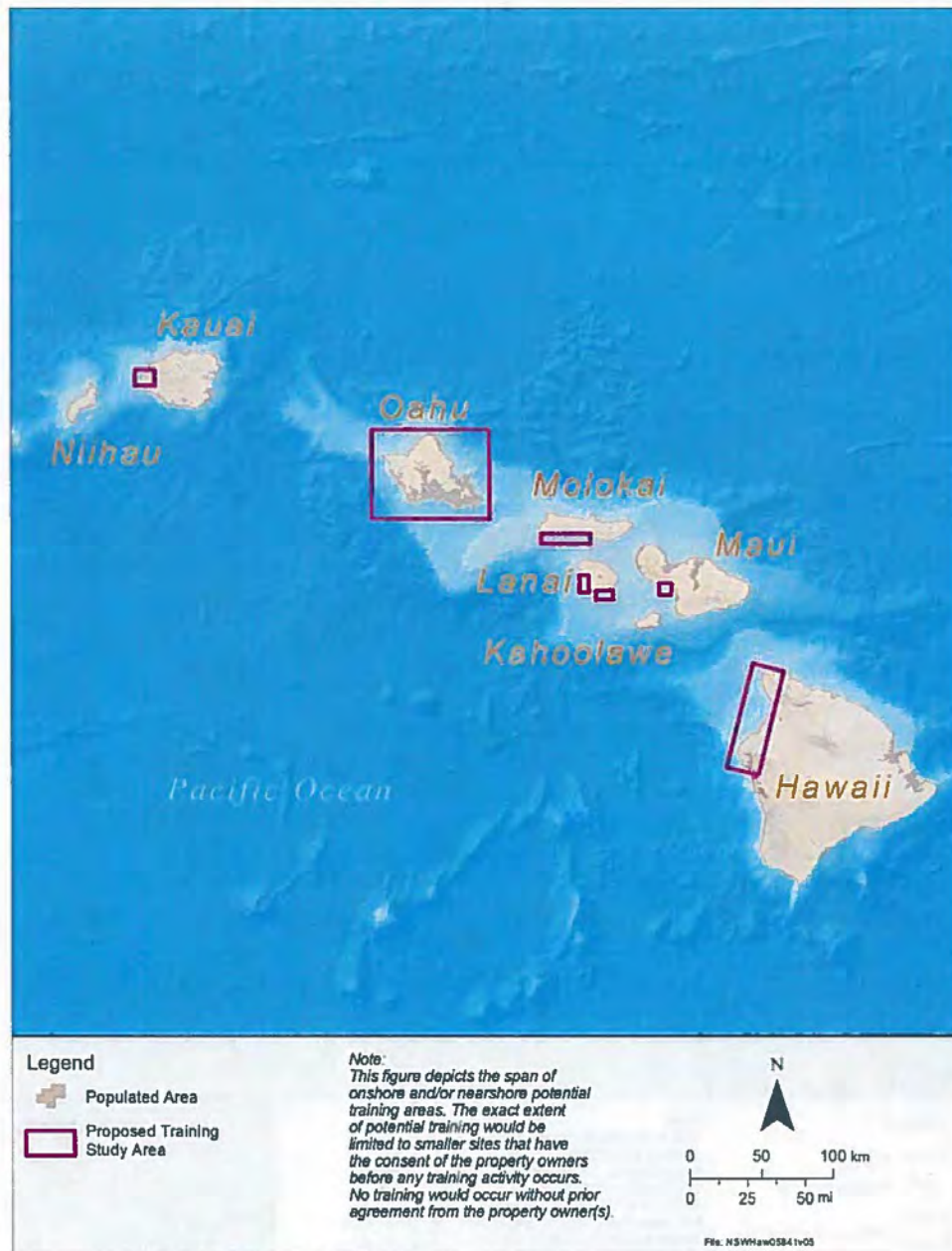


M. R. DELAO
Captain, CEC, U.S. Navy
Regional Engineer
By direction of the
Commander

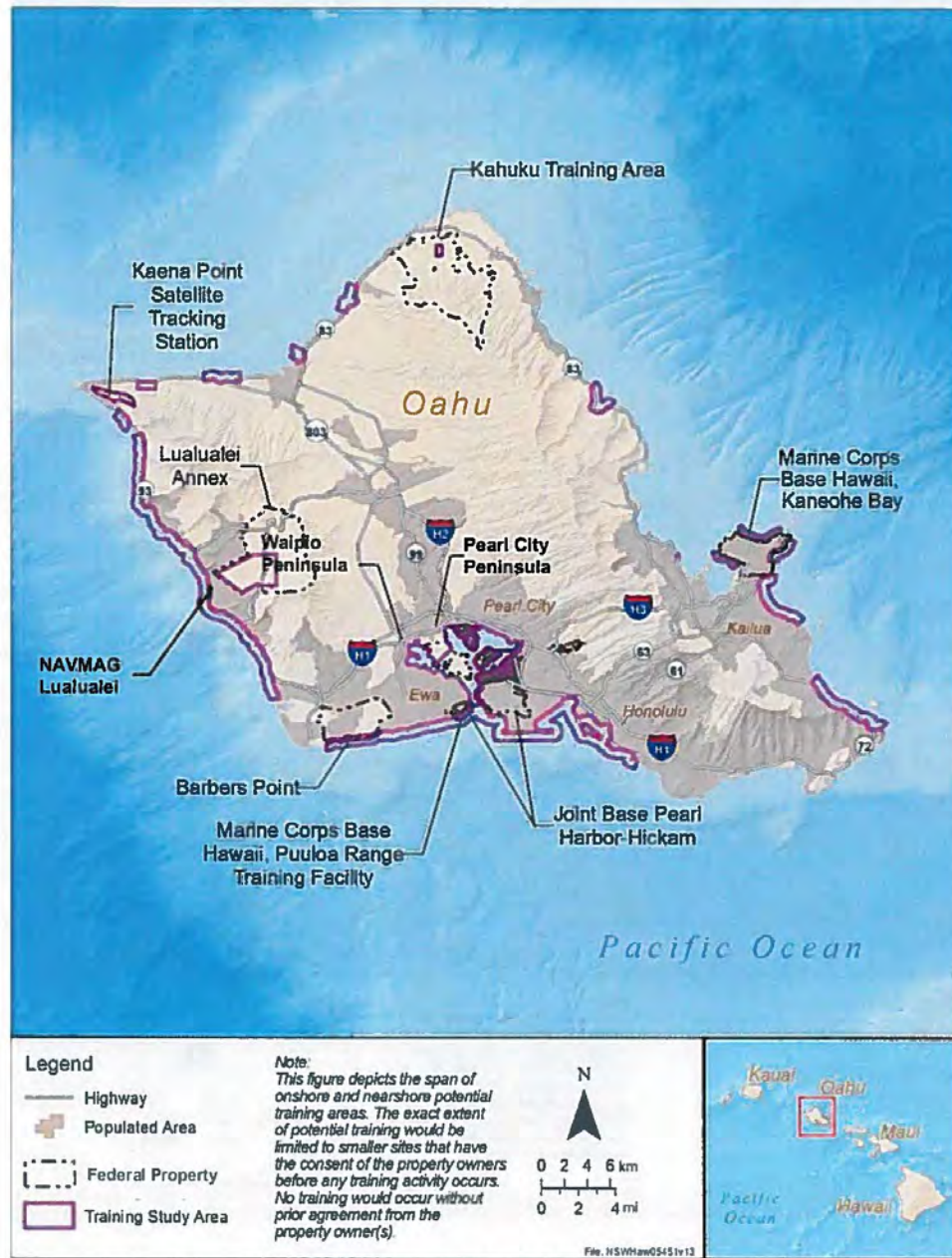
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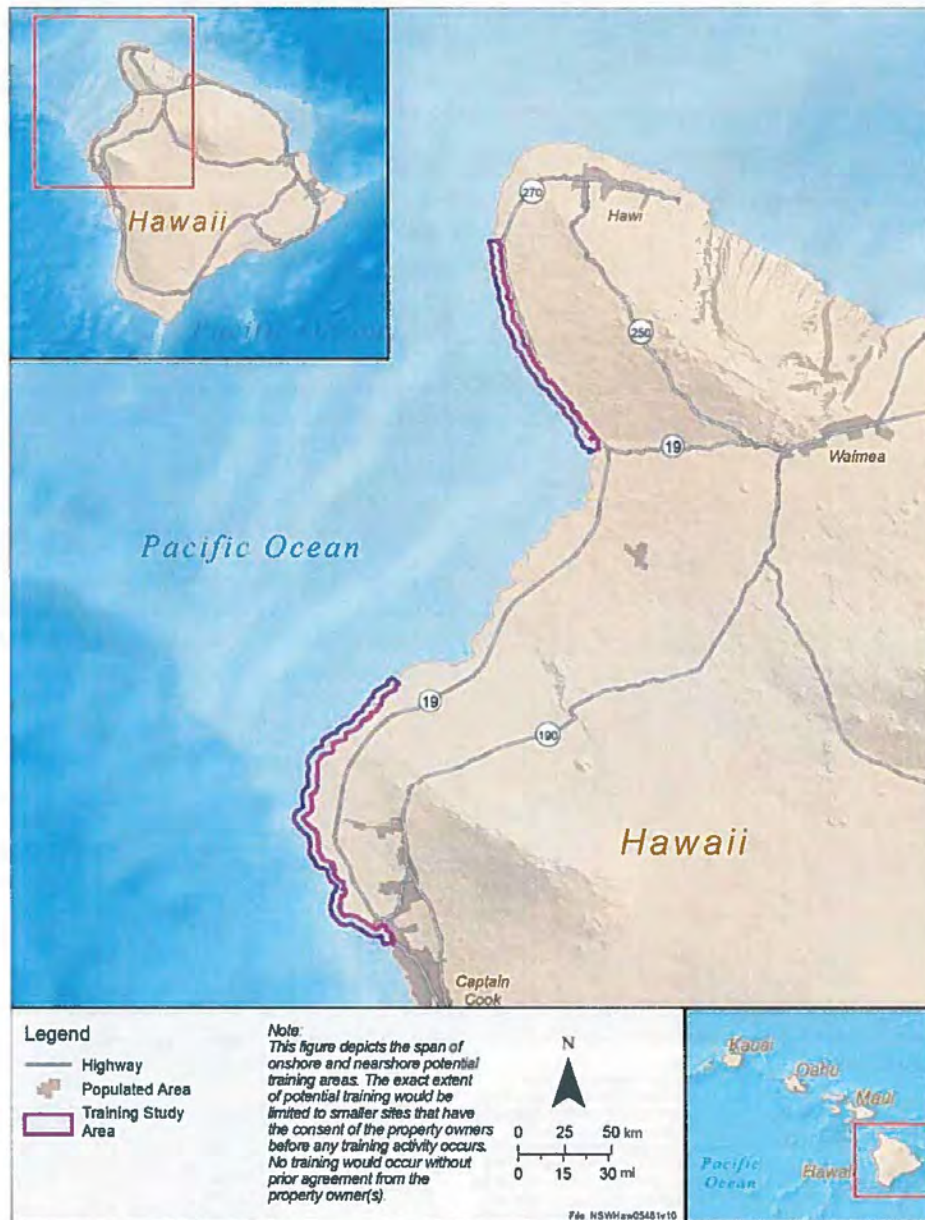
- Enclosures:
1. Location of Hawaiian Islands where Naval Special Operations Training is proposed.
 2. Detail showing the proposed Oahu training areas. The Area of Potential Effect is shown in purple.
 3. Detail showing the proposed Island of Hawaii training areas. The Area of Potential Effect is shown in purple.
 4. Detail showing the proposed training area in the waters off Maui. The Area of Potential Effect is shown as the purple hatched area.
 5. Detail showing the proposed training areas in the waters off Lanai. The Area of Potential Effect is shown in purple.
 6. Detail showing the proposed training area in the waters off Molokai. The Area of Potential Effect is shown in purple.
 7. Detail showing the proposed Kauai training areas. The Area of Potential Effect is shown as the purple hatched area.
 8. Proposed Naval Special Operations Training Activities.
 9. Historic Properties located within the APE.
 10. References.
 11. Native Hawaiian organizations and historic partners that are concurrently being sent the letter initiating Section 106 consultation for the proposed Naval Special Operations Training in Hawaii.



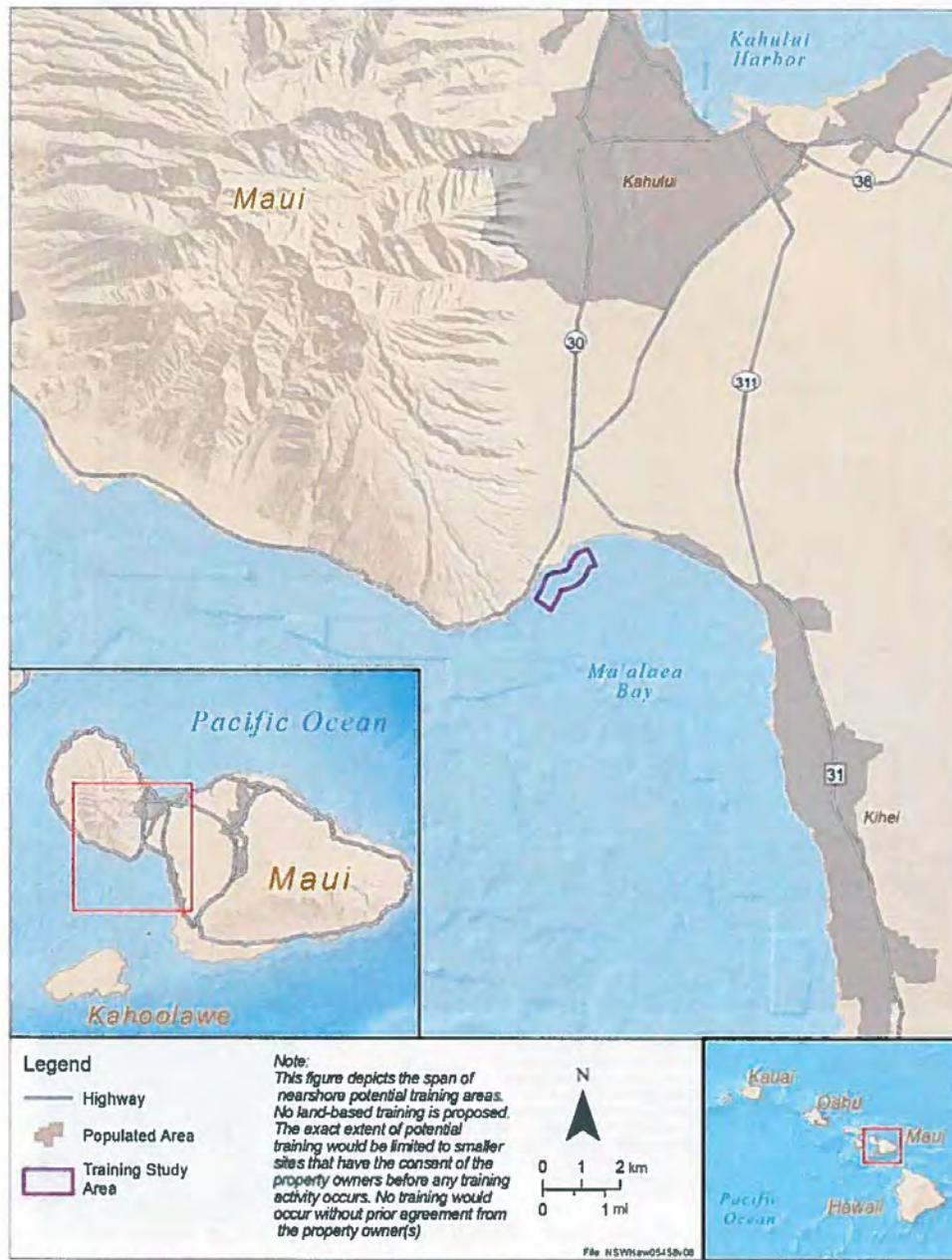
Enclosure 1. Location of Hawaiian Islands where Naval Special Operations Training is proposed.



Enclosure 2. Detail showing the proposed Oahu training areas. The Area of Potential Effect is shown in purple.



Enclosure 3. Detail showing the proposed Island of Hawaii training areas. The Area of Potential Effect is shown in purple.



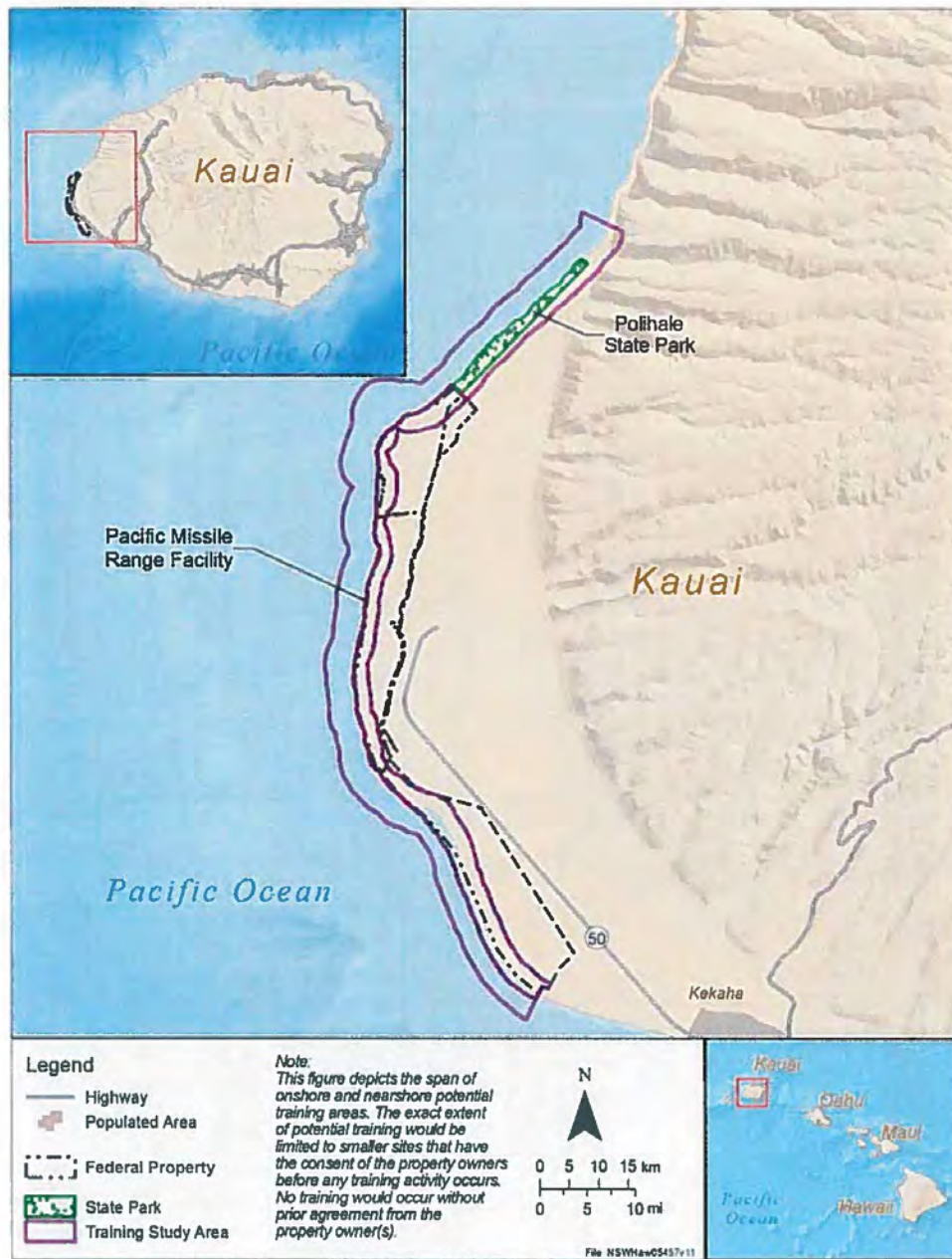
Enclosure 4. Detail showing the proposed training area in the waters off Maui. The Area of Potential Effect is shown in purple.



Enclosure 5. Detail showing the proposed training areas in the waters off Lanai. The Area of Potential Effect is shown in purple.



Enclosure 6. Detail showing the proposed training area in the waters off Molokai. The Area of Potential Effect is shown in purple.



Enclosure 7. Detail showing the proposed Kauai training areas. The Area of Potential Effect is shown in purple.

Enclosure 8. Proposed Naval Special Operations Training Activities.

Activity	Description	Locations	Potential Effects on Historic Properties
Diver/Swimmer	Trainees would swim or dive to an objective area (e.g., harbor, beach, moored vessel) for up to six hours (see below for over the beach training).	Pearl City Peninsula Annex, Inactive Ship Yard, Ford Island, Mobile Diving Salvage Unit (MDSU), Honeymoon Beach, Lima Landing, Puuloa Range Training Facility, Iroquois Point Harbor, Keehi Boat Harbor, Sands Island Beach, Kewalo Basin, MCBH (MCAS, North Beach, Pyramid Rock Beach), Haleiwa Boat Ramp, Koolina Marina, Barbers Point Harbor, Mahukona State Beach, Kawaihae Harbor, Mailiu Park, Maalaea Bay, Haleolono Harbor, and Kaunakakai.	Divers and swimmers maneuver in the water near shore; no live fire training or explosives
High Angle Climbing	Trainees negotiate cliffs, rock faces, and other vertical challenges to develop infiltration and retrieval of climbing equipment techniques.	Dillingham	Trainees will maneuver along steep cliffs with low likelihood of historic properties
Insertion/Extraction	Trainees would approach or depart an objective area using submersible craft, to include UUV (small, battery-powered, unmanned submersible that is hand-launched), or watercraft (such as jet skis, waverunners, or small boats); activity trains personnel to effectively insert and extract people and equipment during the day or night.	In the waters around Pearl City Peninsula Annex, Inactive Ship Yard, Waipio Peninsula, Ford Island, Mobile Diving Salvage Unit (MDSU), Honeymoon Beach, Lima Landing, Puuloa Range Training Facility, U.S. Coast Guard Station Barbers, White Plains Beach, Sands Island Beach, Ala Moana Beach, Makapuu Beach, Waimanalo Beach, Kailua Beach, Keawaula Beach, Makaha Beach, Waimea Beach, Haleiwa Boat Ramp, Mahukona State Beach, Mailiu Park, Barking Sands/Mana Point, and Polihale State Park; and in Iroquois Point Harbor, Keehi Boat Harbor, Kewalo Basin, Kahana Bay, Makaleha Stream, Pokai Bay, Ulehawa Beach, Barbers	Maneuver in the off shore environment avoiding submerged historic properties including the shipwrecks in Pearl Harbor (USS <i>Arizona</i> , USS <i>Utah</i>), plane wreck in Kailua Bay, the submerged aircraft and landing craft in Maalaea Bay, and the screw steamship (the <i>Kauai</i>) in the waters off Mahukona; no explosives

		Point Harbor, Kawaihae Harbor, Maalaea Bay, Haleolono Harbor, and Kaunakakai	
Landing/Drop Zone	Landing Zone training activities consist of helicopters landing on landing pads. Drop Zone training activities consist of trainees parachuting or inserting into an area (land or water) via rope suspension.	Pearl City Peninsula Annex, Waipio Peninsula, Ford Island, MCBH (waters south of MCAS, waters off Pyramid Rock Beach), Canes Drop Zone, Lualualei Range	Most Landing/Drop Zones (LZ/DZ) are established; new LZ/DZ at Waipio Peninsula located in an previously disturbed area; DZ at MCBH MCAS will not affect submerged PBY located in the waters off the Kaneohe NAS NHL since the trainees swim near the surface
Over-the Beach	Trainees would exit the water, cross the beach, and quietly transition to land where they would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective.	Pearl City Peninsula Annex, Waipio Peninsula, Ford Island, Honeymoon Beach, Lima Landing, Puuloa Range Training Facility, U.S. Coast Guard Station Barbers, White Plains Beach, Keehi Boat Harbor, Sands Island Beach, Ala Moana Beach, Makapuu Beach, Waimanalo Beach, Kailua Beach, MCBH Ranges, Kahana Bay, Waimea Beach, Haleiwa Boat Ramp, Makaleha Stream, Keawaula Beach, Makaha Beach, Pokai Bay, Ulehawa Beach, Mahukona State Beach, Malii Park, Barking Sands/Mana Point, Polihale State Park	Trainees focus on leaving no trace, they will follow all real estate agreements for non-Federal properties; for Federal properties, the trainees will follow established protocols and will avoid historic buildings, submerged shipwrecks, archaeological sites, and memorials; there are many historic properties located along the coast such as archaeological sites and historic buildings; the trainees will avoid these sites, such as the sites in the dunes on Mokapu Peninsula, Barking sands/Mana Point, Polihale State Park, and Makaha Beach; in addition, they will avoid the historic buildings and building remnants at Mahukona State Beach, Puuloa Range Training Facility, Ala Moana Beach, Makapuu Beach, and Waimanalo Beach
Simulated Building Clearance	Trainees conducting simulated actions against a site, or a military individual	Pearl City Peninsula Annex, Inactive Ship Yard, Waipio Peninsula, Ford	Simulated building clearance will occur in historic buildings at Ford

	designated as part of the exercise who is simulating a threat or enemy, within the boundaries of a confined area or building; trainees' operate within a small unit, move into a structure, conduct clearance from room to room, and engage in role-play (military instructors or support staff) simulated combat scenarios using simulated weapons and simulated munitions; trainees remain concealed and silent, and then depart the area avoiding detection with minimal disturbance; simulated munitions would be marking rounds, which are specialized plastic/paint capsules that are environmentally friendly and water soluble and that do not damage property; simulated building clearance is only proposed on federal property.	Island, Mobile Diving Salvage Unit (MDSU), Honeymoon Beach, Lima Landing, and Lualualei Range	Island and Lualualei; the trainees will leave no trace of their activities and clean up any materials following the training exercise
Special Reconnaissance	Trainees would hike to a designated observation point where they would remain undetected for a period of time with the goal of leaving no trace of their presence behind; this includes no vegetation trampled, no branches broken, no footprints visible, or any other indicators that they were there.	Pearl City Peninsula Annex, Waipio Peninsula, Honeymoon Beach, Fort Kamehameha, U.S. Coast Guard Station Barbers, White Plains Beach, Kaena Point Satellite Tracking Station, Lualualei Range, Maliu Park, Barking Sands/Mana Point, and Polihale State Park	Trainees focus on leaving no trace as they hike within the special reconnaissance area; trainees will not enter the historic structures and will avoid the archaeological sites at Fort Kamehameha, Pearl City Peninsula, Kaena Point Satellite Tracking Station, Lualualei Range, Maliu Park, Barking Sands/Mana Point, and Polihale State Park (no archaeological sites are within the special reconnaissance area at Honeymoon Beach and U.S. Coast Guard Station Barbers)
Submersible Launch	Training would be conducted in water	Pearl City Peninsula Annex, Waipio	The submersible launch and

<p>& Recovery</p>	<p>areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge (not on military property); Trainees would also practice operating and maneuvering small personal watercraft (such as jet skis or waverunners) to obtain safety qualifications and certifications.</p>	<p>Peninsula, Ford Island, Keehi Boat Harbor, Maunaloa Boat Ramp, MCTAB, MCBH (Pyramid Rock Beach, MCAS), Heeia Boat Ramp, Haleiwa Boat Ramp, Pokai Bay, Barbers Point Harbor, Kawaihae Harbor, Malii Park, Maalaea Harbor</p>	<p>recovery will utilize existing boat ramps and entry/egress points or use cranes to lower/raise the submersible from the water</p>
<p>Unmanned Aerial System</p>	<p>Hand-launched or catapult system, a control system, and a remotely piloted or self-piloted (i.e., preprogrammed flight pattern) air vehicles that carry only non-hazardous payloads such as cameras, sensors, and communications equipment; deployed and fly within an authorized training area (such as restricted airspace and warning areas), as prescribed by the DoD and FAA.</p>	<p>Pearl City Peninsula Annex, Inactive Ship Yard, Waipio Peninsula, Ford Island, Mobile Diving Salvage Unit (MDSU), Honeymoon Beach, Lima Landing, Puuloa Range Training Facility, Fort Kamehameha, U.S. Coast Guard Station Barbers, White Plains Beach, MCBH Ranges, Canes Drop Zone, Kewaula Beach, Kaena Point Satellite Tracking Station, Luahualei Range, and Barking Sands/Mana Point</p>	<p>The unmanned aerial system is deployed in the air over DoD lands as prescribed by the DoD and FAA</p>

Enclosure 9. Historic properties identified within the Area of Potential Effect (APE).

Hawaii Island

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Ala Kahakai Trail		Ala Kahakai National Historic Trail Act, Public Law 106-509-Nov. 13, 2000	National Historic Trail designated in 2000; discontinuous trail 175-mile long that is classified as a district; part of the Ala Loa (long trail) that circles the island; several section of the trail are listed in the NRHP as individual properties	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Hale Halawai O Holualoa		NRHP #87000794	A, C; also known as the Holualoa Stone Church Ruins, a meeting house constructed in the early 1850s on the north shore of Holualoa Bay	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kalaloa Permanent House Site		NRHP #73000654	D; traditional Hawaiian village site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kawaluna Heiau	SIHP # 50-10-27-19796	Assumed Eligible*	D; Enclosure with burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kiholo-Puako Trail or Ala Loa (long trail) Trail		NRHP #87001127	A; a coastal trail in South Kohala that extends from Kiholo Bay to Kalahuipaua near Puako	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Ko'a of Halepau	SIHP #50-10-27-2139	Assumed Eligible*	A, D; Fishing Heiau and Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mailekini Heiau	SIHP #50-10-27-13584	Assumed Eligible*	A, D; Heiau Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
Old Kawaihae-Puako Road	SIHP #50-10-27-14057	Assumed Eligible*	D; Road	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1878	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1879	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1880	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1881	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1882	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1883	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1884	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-1885	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1886	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1887	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1888	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1890	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1891	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1892	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1905	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-1906	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1907	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1909	Assumed Eligible*	D; Heiau	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1910	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1911	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1912	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1913	Assumed Eligible*	D; Heiau	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1914	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-1915	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1916	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-2001	Assumed Eligible*	D; Petroglyphs	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-2002	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-2140	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4123	Assumed Eligible*	D; Salt Pan	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4681	Assumed Eligible*	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4682	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-4688	Assumed Eligible*	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4689	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4690	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-5666	Assumed Eligible*	D; Trail (historic)	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6444	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6491	Assumed Eligible*	D; Modified Overhang	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6492	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6493	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-6494	Assumed Eligible*	D; Pond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6499	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6502	Assumed Eligible*	D; Sealed Overhang	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6503	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6516	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6518	Assumed Eligible*	D; Habitation Complex with Trail	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6520	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6524	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-6525	Assumed Eligible*	D; Burial Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6526	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6527	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6666	Assumed Eligible*	D; Paving	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6667	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6668	Assumed Eligible*	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6669	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6672	Assumed Eligible*	D; Paving	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-6673	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6674	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6676	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6677	Assumed Eligible*	D; Paving	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-7149	Assumed Eligible*	A, D; Hawaiian Railroad Company Terminal and Harbor Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-7351	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-7355	Assumed Eligible*	D; C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SHIP #50-10-05-4157	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-18-5354	Assumed Eligible*	D; Lava tube shelters	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10181	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10232	Assumed Eligible*	D; Two platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10234	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10235	Assumed Eligible*	D; Anchialine Pond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10236	Assumed Eligible*	D; Two enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10237	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10238	Assumed Eligible*	D; Cave and enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-10239	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10241	Assumed Eligible*	D; Two enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10242	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10243	Assumed Eligible*	D; Habitation and trail	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10244	Assumed Eligible*	D; Caves	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13560	Assumed Eligible*	D; Habitation complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13572	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13573	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-13574	Assumed Eligible*	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13577	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13578	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13579	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13580	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13581	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13582	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13583	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-13585	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13587	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13588	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13589	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13590	Assumed Eligible*	D; Cairn	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13591	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13592	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13593	Assumed Eligible*	D; Complex with terrace and uprights	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-13594	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13595	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13597	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13598	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13599	Assumed Eligible*	D; Heiau and Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13600	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13601	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13602	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-13603	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13606	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13607	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13610	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13615	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13647	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13650	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13651	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-13653	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13936	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13937	Assumed Eligible*	D; Enclosure and terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13938	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13939	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13948	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13948	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13950	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-13952	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13953	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13956	Assumed Eligible*	D; C-shape and alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13957	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13958	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13959	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13961	Assumed Eligible*	D; Midden deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13962	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-13963	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13980	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14622	Assumed Eligible*	D; Modified pond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14630	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14632	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14671	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14827	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14828	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-14831	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-15132	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-15133	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16048	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16067	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16068	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16069	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16132	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-16190	Assumed Eligible*	D; Anchialine Pond Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16191	Assumed Eligible*	D; Anchialine Pond Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18775	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18776	Assumed Eligible*	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18808	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18810	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18814	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18815	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-18816	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18818	Assumed Eligible*	D; Complex with Modified Outcrop, Cairn, and Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18819	Assumed Eligible*	D; Walled Shelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18820	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18822	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18825	Assumed Eligible*	D; Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18829	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-19796	Assumed Eligible*	D; Enclosure with Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				in NRHP
	SIHP #50-10-27-19797	Assumed Eligible*	D; Petroglyphs	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-27307	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-30224	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Steam screw-Kaua'i	NOAA #375	Assumed eligible*	D; steamship named after the island of Kauai; sank off of Mahukona Port Dec 24, 1913	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.

Kauai

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Kawaiele Ditch	SIHP #50-30-05-0721	Eligible	A; Agricultural/ plantation drainage ditch. Excavated in 1878 to drain Kawaiele Pond to drain marshland for sugar cultivation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kinikini Ditch		Eligible	A; Plantation Era Ditch through the dune to drain marshland for sugar	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Ditch		Eligible	A; Plantation Era Ditch excavated in 1922 through the dune to drain	No effect; activities not proposed here, therefore no alteration to characteristics of

			marshland for sugar	historic property qualifying it for inclusion in NRHP
Nohili Dune	SIHP # 50-30-01-0007	Eligible	ancient burial ground within Nohili Dune (50-30-01-1860)	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
‘Elekuna Heiau	SIHP # 50-30-01-0008	Eligible	D; inland side of Nohili Dune site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Dune	SIHP # 50-30-01-0009	Eligible	D; House sites; inland side of Nohili Dune (Site 1-1860)	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Site	SIHP #50-30-05-1829	Eligible	D; Habitation Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Site	SIHP # 50-30-05-1830	Eligible	D; cultural deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Dune	SIHP #50-30-01-1860	Assumed eligible*	D; Nohili Dune site includes Sites 01-007, 01-0008, 01-0009, and 01-6027	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Site	SIHP #50-30-01-6027	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Polihale Heiau	BPBM #50-Ka-C07-002	Assumed Eligible*	A four-terraced Heiau located on the seashore at the base of Polihale Cliff	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-	Eligible	A, D; World War II Era Pillbox	No effect; activities not proposed here,

	01-2007			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2008	Eligible	A, D; Concrete Box for Fuel Delivery	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP # 50-30-01-2013	Eligible	A; metal gun turret	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2017	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2019	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2021	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2023	Eligible	A, D; Concrete box, associated with early World War II-era development	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP # 50-30-01-2027	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2028	Eligible	A; Gun Emplacement	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-30-01-2032	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2033	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2034	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2036	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2037	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2038	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2039	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2040	Eligible	A; Double Horseshoe or M Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2047	Eligible	A; Gun Emplacement	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-30-01-2048	Eligible	A, C; World War II Era Pillbox	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2050	Eligible	A, C; Concrete (fuel delivery) tank	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-0616	Assumed Eligible*	D; Japanese Plantation Cemetery	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-0825	Assumed Eligible*	D; Unmarked Cemetery	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-0826	Eligible	D; Habitation Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1831	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1833	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1834	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1884	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of

Maui

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Aircraft- F6F Hellcat	NOAA #866	Assumed eligible*	A; World War II era fighter aircraft in Maalaea Harbor	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.

Oahu

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Facility S359 (Ford Island building/structure)		Contributing*	A, C; Seaplane Ramp 3, Runway "C," built in 1930; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility S360 (Ford Island building/structure)		Contributing*	A, C; Seaplane Ramp 4 built in 1930; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 55 (Ford Island building/structure)		Contributing*	A, C; Barracks, Enlisted Quarters E1/E4; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 1745 (Ford Island building/structure)		Contributing*	A, C; Army hangar, biplane; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 2 (Lualualei Naval Magazine building/structure)		Eligible	A, C; Security HQS Police Station, originally dispensary; built in 1933; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 2A		Eligible	A, C; Security HQS Police Station,	No effect; proposed activities will not alter

(Lualualei Naval Magazine building/structure)			originally dispensary records room; built in 1933; vacant	the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3 (Lualualei Naval Magazine building/structure)		Eligible	A, C; Enlisted men's quarters; built in 1932; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 4 (Lualualei Naval Magazine building/structure)		Eligible	A, C; Storehouse, heavy metals; originally a garage; built in 1933	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 68 (Lualualei Naval Magazine building/structure)		Eligible	A, C; Transmitter building; built in 1944; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 5A (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Marine barracks built in 1935; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 6 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 7 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 8 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Jr Officers Quarters built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 9 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Jr Officers Quarters built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP

Facility 10 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 11 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 12 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 22 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 23 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 24 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 25A (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 68 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Transmitter building built in 1944; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 11 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

Facility 35 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	in NRHP No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Facility 39005 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Facility 39006 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kaneohe Naval Air Station (NAS) NHL		NHL #87001299	A; Historic district comprised of aircraft hangars, seaplane ramps, and a parking apron that was part of Japanese attack on Kaneohe NAS on 7 December 1941	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 1 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 2 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 3 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 4 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 5 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the

				characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 149		Eligible	A; Fuel pier constructed in 1941	No effect; swimming and diving around the fuel pier will not affect the characteristics of the historic pier that qualify it for inclusion in NRHP
Aircraft- PBY Catalina		Eligible	A, D; Aircraft sunk during the 7 December 1941 attack of NAS Kaneohe	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Chinatown Historic District		NRHP #73000658	A, C; ca. 36 acres in the city of Honolulu and borders Honolulu Harbor and reflects a contiguous architectural and historic character of the early 20 th century	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Ala Moana Beach Park (Art-Deco Parks)	SIHP #80-14-1388	Listed on State Register	A, C; Beach park	No effect; over the beach activities consistent with the use as a public beach; no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Aloha Tower		NRHP #76000660	A, C; Aloha Tower at Pier 9, Honolulu Harbor, is a 184 foot, 10-storied concrete tower completed in 1926; became a symbol of Hawaii's investment in tourism and was the landmark of Honolulu's waterfront area	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Barbers Point Archaeological District	SIHP #50-80-12-2888	Assumed Eligible*	D; Traditional Hawaiian Sites in Ewa	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Hasebrouck (Fort Kamehameha)	SIHP #50-80-13-1560	NRHP #84000925	A, C; constructed between 1909 and 1914. It is one of several batteries as a part of the coastal artillery batteries to defend Pearl Harbor.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Hawkins	SIHP #50-80-	NRHP	A, C; constructed in 1914. It is one of	No effect; activities not proposed here,

(Fort Kamehameha)	13-1602	#84000928	several batteries as part of the coastal artillery batteries to defend Pearl Harbor.	therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Hawkins Annex (Fort Kamehameha)	SIHP #50-80-13-1603	NRHP #84000948	A, C; artillery District of Honolulu TR	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Jackson (Fort Kamehameha)	SIHP #50-80-13-1601	NRHP #84000954	A, C; constructed in 1914. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Selfridge (Fort Kamehameha)	SIHP #50-80-13-1600	NRHP #84000975	A, C; constructed between 1907 1913. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Facility 3341H (Fort Kamehameha)		NRHP District #84000925	A, C; non-contributing element of the Fort Kamehameha District; constructed in 1916 as SAN Sewage Pump STN 27;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3342H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3343H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3344H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3345H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3346H		NRHP District	A, C; contributing element of the Fort	No effect; proposed activities will not alter

(Fort Kamehameha)		#84000925	Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3347H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3348H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3349H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Battery Randolph (Fort DeRussy)	SIHP #50-80-08-1607	NRHP # 84000971	A, C; artillery District of Honolulu TR	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Charles and Mae Boettcher Residence	SIHP #50-80-11-9760	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Falls of Clyde		NHL #73000659	A; iron-hulled, four-masted full rigged ship built in 1878	No effect; moored in Honolulu Harbor; Navy is not proposing to train or test near this resource.
Farrington Highway	SIHP #50-80-07-6824	Assumed Eligible*	D; Farrington Highway, constructed in the 1930s as part of the Territorial Highway System	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Haleiwa Beach Park (Art-Deco Parks)	SIHP #50-80-04-1388	Listed on State Register	A, B; Beach park constructed in 1939; designed by architect Harry S. Bent	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
He'eia Fishpond	SIHP #50-80-	NRHP	D; Traditional Hawaiian fishpond	No effect; activities not proposed here,

	10-0327	#73000671		therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Hickam Field		NRHP #85002725	A; established southeast of Pearl Harbor Naval Base and was one of the installations attacked on 7 December 1941	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
“Hilltop House,” “Pu’uhonua,” or “Bird Lady’s House”	SIHP #50-80-11-9009	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Huilua Fishpond	SIHP #50-80-06-0301	NHL #66000295	Listed on NRHP	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kahalu’u Fishpond	SIHP #50-80-10-0319	NRHP #73000668	Listed on NRHP	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kalou Fishpond	SIHP #50-80-01-0257	Listed on State Register	D; the fishpond was used in aquaculture and illustrates the intimate knowledge of sea husbandry, engineering, and conservation that was attained by the ancient Hawaiians	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kaneohe Naval Air Station		NRHP #87001299	A; one of the first installations attacked on December 7 1941 and brought the United States into World war II	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Kapapa Island Complex		NRHP #72000430	D; a traditional Hawaiian ceremonial site on an island in Kaneohe Bay	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kealakāpapa Road	SIHP #50-80-15-0003	Assumed Eligible*	D; Stone Paved Road near Wāwāmalu	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

Keawaula Complex	SIHP #50-80-03-2805	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Ko'amanō Reef	SIHP #50-80-10-0325	Assumed Eligible*	D; Reef used in traditional Hawaiian fishing practices	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kolea Koa	SIHP #50-08-03-0195	Assumed Eligible*	D; Koa or shrine	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kuakea Koa	SIHP #50-08-03-0193	Assumed Eligible*	D; Kuakea Fishing Shrine	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kū'ilioloa Heiau	SIHP #50-80-07-153	Assumed Eligible*	A, D; Restored heiau with open terrace and three platforms, Pokai, Waianae	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Landing craft- LC Pearl Channel	NOAA #885	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Landing craft- LC Pearl Harbor	NOAA #908	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Landing craft- Pearl Channel 1	NOAA #883	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural

				resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Landing craft- Pearl Channel 2	NOAA #884	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Laulaunui Fishpond	SIHP #50-80-13-0140	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Amana	SIHP #50-80-13-0097	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Apala	SIHP #50-80-09-0118	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Hanaloa	SIHP #50-80-13-0125	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kaaukuu	SIHP #50-80-13-0126	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kamakupohaku	SIHP #50-80-09-0104	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Ke'oki	SIHP #50-80-13-0095	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
Loko`ea Fishpond	SIHP #50-80-04-0233	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kuhialoko	SIHP #50-80-09-0119	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kunana/Loko Muliwai	SIHP #50-80-13-0102	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Papiolua	SIHP #50-80-13-0096	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Pōhaku	SIHP #50-80-13-0098	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Waiaho	SIHP #50-80-13-0094	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Wailolowai	SIHP #50-80-13-0100	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Weloko	SIHP #50-80-09-0116	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mākaha Bridge 3	SIHP #50-80-	Assumed	A, D; Bridge constructed in 1937	No effect; activities not proposed here,

	07-6822	Eligible*		therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mākaha Bridge 3a	SIHP #50-80-07-6823	Assumed Eligible*	A, D; Bridge constructed in 1937	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Makapuu Road	SIHP #50-80-15-7310	Eligible	A, D; Historic Road	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Makapu'u Point Light		NRHP #77000447	A; Lighthouse at Makapu'u built in 1909	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Makapu'u Point Light Station	SIHP #50-80-15-7311	Eligible	A, D; Habitation & operational support for the Makapu'u Light	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Makapuu Point Military Reservation	SIHP #50-80-15-7312	Eligible	A, D; Defensive structures as part of the coastal defense system	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mark Robinson Beach House	SIHP #50-80-11-9748	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mauna Lahilahi Point		Eligible*	A; D; traditional cultural place described as a <i>ka'āmani'au</i> —religious and cultural landscape marker; petroglyphs carved into the eastern side; a possible heiau, stone platforms, and shrines are located on the mountain; used as a lookout; important fishing grounds.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Merchant Street		NRHP	C; an area within Honolulu that was	No effect; activities not proposed here,

Historic District		#73000661	once the financial and governmental part of the city and is what remains of "old" Honolulu	therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Moana Hotel		NRHP #72000417	A, C; designed by the notable architect O. G. Traphagen and built in 1901; one of Honolulu's "high-rise" buildings and one of the oldest hotels in Waikiki, serving as a link to the development of the tourist industry	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mokiana Heiau	SIHP #50-80-03-0188	Eligible	A, D; Heiau at Kaeina Point Satellite Tracking Station	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mokumanu underwater cave		Assumed eligible*	D; cave is off the coast of Mokapu Peninsula on the windward side of Oahu; the cave features in Hawaiian legends of this period; the cave is underwater along the shore and will not be impacted by the training and testing activities	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Möli'i Fishpond	SIHP #50-80-06-0313	NRHP # 72000429	Listed on NRHP	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nu'upia Fishpond Complex	SIHP #50-80-11-1002	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Oahu Rail and Land (OR&L) Right of Way	SIHP #50-80-12-9714	NRHP #75000621	A, B, C; the OR&L Right of Way is 15 miles long; it is one of the longest stretches of narrow-gauge operable railroad track still in place in the United States	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
'Okī'okīlepe Pond	SIHP #50-80-13-0143	NRHP #73000673	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

O'ohope Fishpond	SIHP #50-80-10-0337	Assumed Eligible*	D; Fishpond	in NRHP No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Pa'aiau Fishpond	SIHP #50-80-13-0108	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Pāhonu Turtle Pond	SIHP #50-80-15-1037	Listed on State Register	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Pamoku Fishpond	SIHP #50-80-13-0142	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Robert McCorrison Beach House	SIHP #50-80-11-9763	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Submarine- Japanese Type A- sank 1941	NOAA #740	Assumed eligible*	A, D; World War II Japanese midget submarine sunk outside the entrance of Pearl Harbor on December 7th, 1941 by the destroyer USS Ward.	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Submarine- Type A (stern-section)- sank 1941	NOAA #525	Assumed eligible*	D; Five Ko-Hyoteki or Target Type-A Japanese midget submarine. Five midget subs took part in the event on December 7, 1941. This is part of a 3 – piece site, possibly salvaged from Pearl Harbor and disposed.	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
U.S. Coast Guard Makapuu Light	SIHP #50-80-15-1355	NRHP #77000447	A; the lighthouse has the largest lens of any lighthouse in the United States and	No effect; activities not proposed here, therefore no alteration to characteristics of

House			its location on the Island of Oahu is considered to be of vital importance to maritime commerce.	historic property qualifying it for inclusion in NRHP
'Uko'a Fishpond	SIHP #50-80-04-0236	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
USS Arizona Memorial		NRHP #66000944	A; constructed to recognize the valor of those who were attacked in Pearl harbor, Oahu on 7 December 1941 and marks the resting place of the USS Arizona	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
USS Arizona Wreck		NHL #89001083	A, C, D; Battleship that was attacked and sank on 7 Dec 1941; it is a major shrine and point of remembrance for the lost battleship and the entire attack	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
U.S.S. Bowfin	SIHP #50-80-13-1356	NHL #82000149	A; World War II Fleet Type American Submarine; 1 of 15 remaining submarines of this type	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
U.S.S. Missouri Battleship	SIHP #50-80-13-9817	NRHP #71000877	A; Battleship that hosted the signing of Japanese surrender that ended World War II	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
USS Utah Wreck		NHL #89001084	A, C, D; focal point of a shrine erected to honor Utah's crew, some of whom lost their lives while trying to save their torpedoed ship during the Japanese attack	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
U.S. Naval Base Pearl Harbor	SIHP #50-80-13-9992	NRHP #66000940	A, C; large, landlocked port that contributed to the rise of the United States as a major world war power in the Pacific and for most of the century it has sheltered, armed, and repaired naval ships, submarines, and aircraft. The attack on 7 December 1941 focused on Pearl Harbor	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP

Waianae District		NRHP #74000720	D; a traditional Hawaiian village site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Waianae District Park	SIHP #50-80-12-3967	Assumed Eligible*	D; Encompasses Sites 4822-4826; sinkholes, enclosures, wells (sinks with water), mounds, walls, and a burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Waikalua Fishpond	SIHP #50-80-10-0349	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Waikīkī Fishing Grounds-identified by accumulation of stone breadfruit-type (octopus) sinkers		Assumed eligible*	D; fishing grounds with associated stone sinkers provides information on traditional Hawaiian fishing techniques.	No effect; located under the water in an area where ships will be transiting; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
World War I Memorial Natatorium		NRHP #80001283	A, C; constructed in 1927 as a World War I memorial; an open air structure with an ocean-fed pool and Beaux-Arts inspired main entry on west side of Kapiolani Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-03-3714	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-03-3715	Eligible	A, D; World War II Winching Station Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-03-3716	Eligible	A, D; Historic Ranch Structure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-03-5467	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-0235	Assumed Eligible*	D; Stone at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5489	Assumed Eligible*	D; Historic House Site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5490	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5493	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5494	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5495	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5561	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5641	Assumed Eligible*	A, D; World War II Structure Remnants at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5642	Assumed Eligible*	A, D; World War II Structure Remnants at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5643	Assumed Eligible*	A, D; World War II Structure Remnants at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5644	Assumed Eligible*	D; Historic Trash Dump	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5791	Assumed Eligible*	A, D; OR&L Right of Way	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5795	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5850	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5915	Assumed Eligible*	D; Basalt Boulder Structure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5916	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Assumed	D; Cultural Deposit	No effect; activities not proposed here,

	04-6401	Eligible*		therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-7604	Assumed Eligible*	D; Sugarcane Road	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-0176	Assumed Eligible*	D; Salt basins along the beach; in the lava rocks projecting above the sand in Ohikilolo	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4064	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4822	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4823	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4824	Assumed Eligible*	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4825	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4826	Assumed Eligible*	D; L-Shaped Habitation Feature	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-07-6634	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6635	Assumed Eligible*	D; Historic Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6704	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6705	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6825	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1823	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1866	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1868	Eligible	D; C-Shapes and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1879	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-08-1880	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1941	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1946	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1966	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5973	Eligible	D; Mounds	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5974	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5975	Eligible	D; Mounds	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5976	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5977	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5978	Eligible	D; C-Shapes and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5979	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5980	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5982	Eligible	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5983	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5984	Eligible	C; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5985	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5986	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Terraces	No effect; activities not proposed here,

	08-5989			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5990	Eligible	D; Habitation/Agriculture Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5991	Eligible	D; Terrace and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5992	Eligible	D; Depression	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5993	Eligible	C; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5997	Eligible	D; Terraces and C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5998	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5999	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6000	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6002	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6003	Eligible	D; Rockshelter and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6004	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6005	Eligible	D; Terraces, C-Shape, and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6007	Eligible	D; C-Shapes and Platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6008	Eligible	D; Terraces and Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6009	Eligible	D; Mounds and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6011	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6012	Eligible	D; Terrace and Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-08-6014	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6015	Eligible	D; Terrace, Depressions, and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6016	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6017	Eligible	D; Terrace and Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6018	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6019	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6020	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6021	Eligible	A, D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6022	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6023	Eligible	D; Mounds, Terraces, and Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6024	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6025	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6026	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6027	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6028	Eligible	D; Terraces and Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6031	Eligible	D; Enclosures, Terraces, and C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6033	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Rockshelters	No effect; activities not proposed here,

	08-6034			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6035	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6036	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6037	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6039	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6040	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6041	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6042	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6043	Eligible	D; Rockshelters	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6044	Eligible	D; Terraces and Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6045	Eligible	D; C-Shape and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6046	Eligible	D; C-Shapes, Terraces, and Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6047	Eligible	D; Rockshelter and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6048	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6050	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6053	Eligible	A, D; Platforms and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6054	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6055	Eligible	D; Rockshelter and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-08-6056	Eligible	D; Enclosure and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6057	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6058	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6059	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6061	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6062	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6063	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6064	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6065	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6066	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6067	Eligible	D; Rockshelter and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6068	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6069	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6070	Eligible	D; C-Shape and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6071	Eligible	A, D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6072	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6073	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Rockshelter	No effect; activities not proposed here,

	08-6075			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6077	Eligible	D; Terraces and Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6078	Eligible	D; Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6079	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6080	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6081	Eligible	D; Terrace and Uprights	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6082	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6083	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6084	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6085	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6086	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6087	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6088	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6089	Eligible	D; Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6091	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6092	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6094	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6095	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-08-6096	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6097	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6098	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6100	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6101	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6102	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6104	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6105	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6106	Eligible	D; Rockshelter and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6107	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6108	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6109	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6110	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6111	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6112	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6113	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6114	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Enclosures and Walls	No effect; activities not proposed here,

	08-6115			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6116	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6118	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6119	Eligible	C; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6120	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6121	Eligible	A, D; Enclosures, Terraces, and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6122	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6123	Eligible	D; Alignments and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6124	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6125	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6126	Eligible	A, D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6128	Eligible	D; Terraces and Depressions	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6129	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6130	Eligible	A, D; Enclosure and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6131	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6132	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6133	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6134	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-08-6135	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6136	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6137	Eligible	A, D; Enclosures, Terraces, and Platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6138	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6139	Eligible	A, D; Enclosures and Mounds	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6140	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6141	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6142	Eligible	A, D; Platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6143	Eligible	A, D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6144	Eligible	A, D; Terrace, Mounds, and C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6145	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6146	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6147	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6148	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6148	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6149	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6150	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Terrace	No effect; activities not proposed here,

	08-6151			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6152	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6153	Eligible	D; Modified Outcrop, Walls, and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6155	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6156	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6157	Eligible	A, D; Platform and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6158	Eligible	A, D; Enclosures, Platforms, and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6159	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6160	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6161	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6162	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6163	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6164	Eligible	A, D; Enclosures and Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6165	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6166	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6167	Eligible	A, D; Ditch and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6168	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6169	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-08-6170	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6171	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6172	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6173	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6174	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6175	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6176	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6177	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6179	Eligible	A, D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6180	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6181	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6182	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6183	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6184	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6185	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6186	Eligible	A, D; Enclosures, Mounds, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6187	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Enclosure	No effect; activities not proposed here,

	08-6188			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6189	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6190	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6191	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6192	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6193	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6194	Eligible	C; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6195	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6196	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6197	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6198	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6199	Eligible	A, D; Enclosures and Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6200	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6201	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6202	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6203	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6205	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6206	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-08-6207	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6208	Eligible	D; C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6209	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6210	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6211	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6212	Eligible	D; Rockshelters, Enclosures, and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6213	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6214	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6215	Eligible	A, D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6216	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6217	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6219	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6220	Eligible	D; Enclosure and C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6221	Eligible	A, D; Enclosures and Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6222	Eligible	D; Rockshelters, Enclosures, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6223	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6224	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Enclosure	No effect; activities not proposed here,

	08-6225			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6226	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6227	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6228	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6229	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6230	Eligible	D; Rockshelters, Enclosures, Pavements, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6231	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6232	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6233	Eligible	A, D; Enclosures, Modified Outcrops, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6234	Eligible	A, D; Enclosures, C-Shapes, Platforms, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6235	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6236	Eligible	D; C-Shapes and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6237	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6238	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6239	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6242	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6244	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6245	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

				in NRHP
	SIHP #50-80-08-6246	Eligible	D; C-Shapes and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6247	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6248	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6249	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6250	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6251	Eligible	D; Enclosure and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6252	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6253	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6254	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6255	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6256	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6257	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6258	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6259	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6260	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6261	Eligible	D; Enclosures, Walls, and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6262	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	D; Terrace	No effect; activities not proposed here,

	08-6263			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6265	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6266	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6267	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6270	Eligible	D; Walls and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6271	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6272	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6273	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6274	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6275	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6276	Eligible	A, D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6277	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6278	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6279	Eligible	A, D; C-Shapes and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6280	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6281	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6282	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6282	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

				in NRHP
	SIHP #50-80-08-6283	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6284	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6285	Eligible	D; C-Shapes and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6286	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6287	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6291	Eligible	D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6292	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6294	Eligible	A, D; Platforms and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6295	Eligible	A,D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6296	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6297	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6298	Eligible	D; Walls and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6299	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6302	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6303	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6304	Eligible	A, D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6307	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Eligible	A, D; Habitation Complex	No effect; activities not proposed here,

	08-6308			therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6310	Eligible	A, D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6311	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6312	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6314	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6316	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6318	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6322	Eligible	D; Ditches and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6327	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-08-6328	Eligible	D; Platforms and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6332	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6333	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6334	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6335	Eligible	D; Rockshelters and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6336	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6337	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6338	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6339	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

				in NRHP
	SIHP #50-80-08-6339	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6343	Eligible	D; Wall and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6346	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6348	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6353	Eligible	A, D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6355	Eligible	A, D; Pavement, Ditches, Mounds, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6356	Eligible	D; Wall and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6357	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6358	Eligible	D; Rockshelters	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6360	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6362	Eligible	A, C, D; Enclosures, Mounds, Walls, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6364	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6365	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6367	Eligible	D; C-Shape, Rockshelters, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-0336	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-3322	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-3323	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP # 50-08-	Assumed	D; Burials	No effect; activities not proposed here,

	03-3747	eligible*		therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-08-03-5467	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-08-03-5599	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-08-03-6638	Assumed Eligible*	D; Buried cultural deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-08-03-6708	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-09-7150	Assumed Eligible*	D; Agricultural Soil	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4119	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4120	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4135	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-10-4136	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4140	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4144	Assumed Eligible*	D; Upright Stone	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4671	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-3993	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-4222	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-4453	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-4691	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-4864	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

				in NRHP
	SIHP #50-80-11-5770	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-5771	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6642	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6770	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6770	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6818	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6818	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6921	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6937	Listed in State Register	C; Miles and Kathy Anderson House	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6937	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6967	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6967	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7032	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7054	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7174	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7175	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7175	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-	Assumed	D; Habitation Complex	No effect; activities not proposed here,

	12-1752	Eligible*		therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-1754	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-1755	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-2220	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-3358	Assumed Eligible*	D; Midden Scatter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-3361	Assumed Eligible*	D; Midden Scatter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-4526	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-5130	Assumed Eligible*	D; Sinkhole	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-6592	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

	SIHP #50-80-12-6876	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-6877	Assumed Eligible*	D; C-Shaped Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-6878	Assumed Eligible*	D; Sinkholes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-7672	Assumed Eligible*	D; Ranch Features likely associated with Campbell Cattle Ranch	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-7673	Assumed Eligible*	A; Sewage Septic Treatment System structure associated with the former Army Installation of Camp Malakole	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-9617	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-9633	Assumed Eligible*	D; Burial Cave	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-9714	Assumed Eligible*	A, D; 20th century Sugar Plantation infrastructure consisting of OR&L spur right-of-way and bridge	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-3703	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion

				in NRHP
	SIHP #50-80-13-4499	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-5218	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-5874	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-5875	Assumed Eligible*	D; Post-Contact Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-6907	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-0512	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-0513	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-3989	Eligible	D; Cave	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-5939	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of

				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-7313	Eligible	A, D; Plane Crash Site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-7314	Eligible	D; Military Support	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-7315	Eligible	D; Solar Observatory	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-7409	Eligible	D; Rock Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-7418	Assumed Eligible*	D; Buried Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

* Assumed eligible: The site appears to meet the NRHP eligibility criteria per § 800.4(c)(2); however, as the site is not on Navy controlled property, formal evaluation has not been conducted (16 USC 470h-2(a)(1)). However, pursuant to 16 USC 470h-2(C); the Navy recognizes that the preservation of properties not under the jurisdiction or control of the agency, but subject to be potentially affected by agency actions are given full consideration in planning.

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Enclosure 11. Native Hawaiian organizations and historic partners that are concurrently being sent the letter initiating Section 106 consultation for the proposed Naval Special Operations Training in Hawaii.

Organization Name
Aha Kukaniloko Koa Mana
'Āina Momona (Walter Ritte)
Ala Kahakai National Historic Trail
Alii Nui, Heiau O Na Alii
Aloha First
Association of Hawaiian Civic Clubs
Aukahi
Boyd 'Ohana
Chang, Deborah
Ching Ohana
County of Hawaii Planning Department
Diamond 'Ohana
Flaherty, Charles
Hawaii Council, Association of Hawaiian Civic Clubs
Hawaii County Cultural Resources Commission (Theresa Donham)
Hawaii's Thousand Friends
Hawaiian Civic Club of Waimea
Hawaiian Civic Club of Wahiawa
Hawaiian Civic Club of Waimanalo
Historic Hawaii Foundation
Ho'ohuli 'Ohana
Kahaulelio 'Ohana
Kahekilinuiāhumanu 'Ohana
Kahu Kahakai, Koa Mana, Kupuka'āina O Wai'anae Moku, O'ahu
Kaleilani Cáceres 'Ohana Huihui
Kamehameha Schools (Alapaki Nahale-a)
Keaweamahi 'Ohana
Kekoolani 'Ohana
Kekumano 'Ohana
Ko'a Mana
Koolauloa Hawaiian Civic Club
Ko'olaupoko Hawaiian Civic Club
Kuali'I 'Ohana
Linda Kaleo Paik 'Ohana
Mainland Council Association of Hawaiian Civic Clubs
Makaha Hawaiian Civic Club
Mahu 'Ohana
Naihe 'Ohana
Na Ohana Papa O Mana
National Park Service
Oahu Council of Hawaiian Civic Clubs
Office of Hawaiian Affairs
Office of the Ali'i 'Aimoku, Royal Order of Kamehameha I, Heiau o Māmalahoa

Olds 'Ohana
Ortiz 'Ohana
Paguyo 'Ohana
Pacific Justice and Reconciliation Center
Papa, Richard Likeke, Jr.
Prince Kuhio Hawaiian Civic Club
Pu'uhonua O Waimanalo Neighborhood Board
Quitevis 'Ohana
Royal Order of Kamehameha: Moku o Mamalahoa Moku o Kohala Moku o Kona Moku o Puna
Saffery 'Ohana
Souza 'Ohana
Swatland, David
Temple of Lono
The I'Mua Group
Trainer, Kauai
Wai'anae Hawaiian Civic Club
Waimanalo Neighborhood Board
Waimea Hawaiian Civic Club
Wille, Margaret

A.3.4 Hawaii SHPD Request for Further Information Regarding NHPA Section 106 Consultation for Proposed Naval Special Operations Training in Hawaii (29Apr19)



DAVID V. IGE
GOVERNOR OF
HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD., STE 555
KAPOLEI, HI 96707

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 29, 2019

Captain M. R. Delao
Department of the Navy
Commander Navy Region Hawai'i
850 Ticonderoga Street Suite 110
JBPHH, Hawai'i 96860-5101

IN REPLY REFER TO:
Log No.: 2019.00682
Doc. No.: 1904SH09

Dear Captain Delao:

SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review – Continued Consultation and Request for Concurrence with the Effect Determination Proposed Naval Special Operations Training in Hawai'i Ref. No.5750 Ser N4/0450

Various Ahupua'a, Various Districts, Statewide

TMK: Oahu: (1) 3-9-011, (1) 4-1-014, (1) 4-1-001, (1) 4-1-002, (1) 4-1-003, (1) 4-1-004, (1) 4-1-005, (1) 4-1-006, (1) 4-1-007, (1) 4-1-014, (1) 4-1-015, (1) 4-2-002, (1) 4-3-001, (1) 4-3-003, (1) 4-3-004, (1) 4-3-005, (1) 4-3-006, (1) 4-3-007, (1) 4-3-008, (1) 4-3-009, (1) 4-3-010, (1) 4-3-011, (1) 4-3-012, (1) 4-3-013, (1) 4-3-015, (1) 4-3-016, (1) 4-3-017, (1) 4-3-018, (1) 4-3-019, (1) 4-3-020, (1) 4-3-022, (1) 4-3-083, (1) 4-4-008, (1) 4-4-039, (1) 4-5-001, (1) 4-6-005, (1) 4-6-007, (1) 4-6-016, (1) 4-6-019, (1) 4-6-022, (1) 5-9-004, (1) 6-1-001, (1) 6-1-013, (1) 6-2-001, (1) 6-2-002, (1) 6-8-003, (1) 6-8-006, (1) 6-8-011, (1) 6-9-001, (1) 6-9-003, (1) 8-1-001, (1) 8-2-001, (1) 8-3-001, (1) 8-3-010, (1) 8-4-001, (1) 8-4-002, (1) 8-4-004, (1) 8-4-005, (1) 8-4-006, (1) 8-4-007, (1) 8-4-008, (1) 8-4-010, (1) 8-4-012, (1) 8-4-019, (1) 8-4-030, (1) 8-5-001, (1) 8-5-002, (1) 8-5-008, (1) 8-5-011, (1) 8-6-015, (1) 8-5-017, (1) 8-6-001, (1) 8-6-015, (1) 8-6-016, (1) 8-7-005, (1) 8-7-006, (1) 8-7-007, (1) 8-7-008, (1) 8-7-015, (1) 8-7-016, (1) 8-7-023, (1) 8-7-028, (1) 8-9-001, (1) 8-9-006, (1) 9-1-001, (1) 9-1-013, (1) 9-1-014, (1) 9-1-015, (1) 9-1-017, (1) 9-1-056, (1) 9-1-057, (1) 9-2-049, (1) 9-3-001, (1) 9-3-002, (1) 9-6-001, (1) 9-6-003, (1) 9-7-008, (1) 9-8-019, (1) 9-9-001, (1) 9-9-003

Moloka'i: (2) 5-1-002, (2) 5-3-001, (2) 5-4-002

Hawai'i: (3) 5-7-001, (3) 5-7-003, (3) 5-8-001, (3) 5-9-003, (3) 5-9-016, (3) 5-9-017, (3) 6-1-001, (3) 6-1-003, (3) 6-1-004, (3) 6-2-002, (3) 7-2-004, (3) 7-2-005, (3) 7-2-010, (3) 7-2-017, (3) 7-2-019, (3) 7-2-040, (3) 7-3-009, (3) 7-3-043, (3) 7-3-063, (3) 7-4-008, (3) 7-5-005, (3) 7-5-006, (3) 7-5-007, (3) 7-5-008, (3) 7-5-009

Kaua'i: (4) 1-2-001, (4) 1-2-002

The State Historic Preservation Division (SHPD) received a letter dated March 22, 2019 from the Department of the Navy to continue Section 106 consultation and request the State Historic Preservation Officer's (SHPO's) concurrence with the effect determination for the Proposed Naval Special Operations Training across the state of Hawai'i. The SHPD received this submittal on March 29, 2019.

The Area of Potential Effect (APE) has been defined as the proposed training study area in the Hawaiian Islands as depicted in enclosures 2 to 7 of the Navy's letter. The training is proposed to occur on both federal and non-federal lands. The Navy asserts all training events on nonfederal land would be conducted in accordance with real estate agreements and other authorizations, including those that may be subject to Hawai'i's Historic Preservation Chapter 6E review. The Navy has committed to coordinating with land managers (where applicable), and property owners prior to use of property for training. Proposed training on non-federal sites would be for 10 or fewer events per year,

Captain M. R. Delao
April 29, 2019
Page 2

the majority of which will occur in public harbors and beach parks. The Navy states the APE is larger than the actual area that would be used for the proposed training due to the training's sensitivities and would be limited to smaller sites on federal land and on state and private lands that require the consent of property owners before training activity occurs.

The proposed project includes small unit teams generally consisting of 4-12 personnel participating in land, maritime, and air training activities in nearshore waters and land-based areas on O'ahu, Hawai'i Island, and Kaua'i; and water-based training in nearshore waters (including harbors and bays) of Maui, Moloka'i, and Lana'i for the purpose of teaching trainees the skills to remain undetected (silent and unseen) and to leave no traces of their presence during or after the training activity. The Navy states the proposed project does not include construction activities.

The SHPO does not concur with the Navy's effect determination of no historic properties affected at this time due to the need for additional information.

The SHPD requests a response to the following:

1. Please provide the total acreage of the APE;
2. What percent of the APE has been surveyed for historic properties including either archaeological or architectural inventory surveys. Please provide maps showing the areas surveyed in comparison to the areas within the APE that training will occur within;
3. Has the Navy taken into account previously identified historic properties on state, county, and privately owned lands within the APE? What percent of these lands have been surveyed for historic properties including either archaeological or architectural inventory surveys?
4. What measures are being implemented to ensure historic properties on and off shore will not be impacted by the proposed undertaking? At what distance will training avoid previously identified historic properties?
5. Will watercrafts drive onto shore anywhere within the APE without use of a boat ramp? If so, please indicate where and what measures will be implemented to avoid impacts to historic properties;
6. At any time during the proposed training will training equipment be dropped from the air?
7. What is the anticipated duration of the proposed undertaking?
8. How will the Navy ensure training will not affect the road barricade complex and aircraft revetments at the Pacific Missile Range on Kaua'i?
9. The Navy states a copy of the subject letter was forwarded to additional consulting parties as part of the Section 106 consultation process for the proposed undertaking; please provide documentation of any additional comments or concerns received by consulting parties during the allotted 30 day period as those comments would otherwise not be taken into consideration by our office during our review of the proposed project.

The SHPD looks forward to continuing the Section 106 process for the proposed project.

The Navy is the office of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at Stephanie.Hacker@hawaii.gov or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha,
Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Jeff Pantaleo, Department of the Navy (Jeff.Pantaleo@navy.mil.)

A.3.5 Department of the Navy Response to Hawaii SHPD's 29 April 2019 Request for Further Information Regarding NHPA Section 106 Consultation for Proposed Naval Special Operations Training in Hawaii (24Mar20)



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

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24 MAR 2020

CERTIFIED NO: 7016 0910 0001 0891 7444

Dr. Alan Downer
Deputy State Historic Preservation Officer
Department of Land and Natural Resources
Kakuhikewa Building, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

Dear Dr. Downer:

**SUBJECT: NATIONAL HISTORIC PRESERVATION ACT, SECTION 106 REVIEW:
PROPOSED NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION**

In response to your 30 April 2019 letter (SHPO Correspondence Number Log No.: 2019.00682, Doc. No.: 1904SH09, received 30 April 2019) requesting more information, the United States Department of the Navy (Navy) met with State Historic Preservation Division (SHPD) Archaeology Branch Chief and her Staff on 17 October 2019 to provide more information about the proposed Naval Special Operations Training in Hawaii. During the meeting, we talked about each comment with the goal to provide clarity on the undertaking, ultimately leading to concurrence of the Navy's determination and conclusion of the consultation.

The following responses are provided below to the State Historic Preservation Officer's (SHPO's) request for additional information.

a. Please provide the total acreage of the APE.

(1) RESPONSE: The area of potential effect (APE) is broadly defined as select locations along the coast of the Hawaiian Islands, including both shoreline and in-water locations, totaling approximately 50,000 acres. Training would be limited to discrete locations within the APE. Due to operational security concerns, these locations have not been identified in public documents. However, the Navy met with the SHPD Archaeology Branch Chief and Staff, and discussed the proposed training within the APE, explaining training scenarios and showing them areas where this training is proposed to occur. The Archaeology Branch Chief and Staff were satisfied with this discussion.

b. What percent of the APE has been surveyed for historic properties including either archaeological or architectural inventory surveys? Please provide maps showing the areas surveyed in comparison to the areas within the APE that training will occur within.

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(1) RESPONSE: The Navy has reviewed report documents that indicate areas where archaeological projects and historic building surveys have been conducted. This research included extensive investigation at the SHPD library and digital data files, review of Integrated Cultural Resources Plans, archaeological reports, historic building reports, and landscape reports at the different DoD installations (Joint Base Pearl Harbor Hickam, Marine Corps Base Hawaii, and Schofield and Pohakuloa Training Area), and review of material at the University of Hawaii. The information from these reports were reviewed and the listed and eligible historic properties for the entire Area of Potential Effect was examined; this information is included in Enclosure 1, which additionally includes those historic properties where training is proposed to occur. As discussed with the Archaeology Branch Chief and Staff, the Navy reviewed the reports for projects within the APE and within the proposed area of training; the Navy has not overlaid these project areas onto a map or calculated the total percent surveyed in the APE. The proposed training will not alter the characteristics of the historic properties that make them eligible for listing on the National Register of Historic Places (NRHP).

c. Has the Navy taken into account previously identified historic properties on state, county, and privately owned lands within the APE? What percent of these lands have been surveyed for historic properties including either archaeological or architectural inventory surveys?

(1) RESPONSE: The Navy has taken into account previously identified historic properties on state, county, and privately owned lands within the APE. Enclosure 2 includes a table of identified Historic Properties within the APE; this enclosure identifies where the historic properties are located and indicates if training is proposed at the location.

d. What measures are being implemented to ensure historic properties on and off shore will not be impacted by the proposed undertaking? At what distance will training avoid previously identified historic properties?

(1) RESPONSE: Navy cultural resources professionals will work with the training teams to ensure appropriate awareness of historic properties in all training exercises. This will include Cultural Resources Training and Guidance under the direction of the Navy cultural resources professionals formulated for each training area and include information on how to avoid historic properties and a notification process that needs to be followed if impacts were to occur to a historic property. This notification process will follow the Procedures for post-review discoveries would follow a Post Review Discovery Plan based on 36 CFR §800.13 (Enclosure 3). In the unlikely event that Native Hawaiian human skeletal remains, funerary objects, sacred objects, or objects of cultural patrimony are discovered during training, discovery will be immediately protected from damage and exposure to the elements and the Navy cultural resources professional shall be contacted, who will follow the implementing regulations of the Native American Graves Protection and Repatriation Act (25 U.S.C. 32), as specified in 43 CFR 10.4.

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The Navy cultural resources professionals shall work with training officials to ensure that map data showing avoidance areas will be included on training maps or as pocket maps so that the Trainees know which areas are sensitive and thus would be able to avoid impacting them.

As indicated above, Navy cultural resources professionals will provide guidance on avoidance measures to support specific training exercises. These U.S. Naval Special Warfare Command (NSWC) exercises differ from those that the Navy generally conducts. NSWC operates in small unit teams, which focus on reconnaissance activities, for which the team needs to avoid detection and leave no trace that they were there. Thus, the activities comprising the proposed undertaking are limited by the nature of the training itself. Trainees will learn skills needed to avoid detection and to leave no trace of their presence during or after training activities, which would include any form of change to historic properties.

A training event may consist of one or multiple training activities (e.g., launch and recovery, diver/swimmer, over the beach), which may include foot traffic, support vehicles on marked/paved roads, and diving/swimming in nearby waterways. Training exercises on non-federal property will similarly avoid actions that could affect historic properties and will follow all stipulations in real estate agreements or right-of-entry permits, including avoidance of cultural sites and historic properties. For training in offshore locations, the Navy utilizes the electronic navigational charts (ELC), which uses the NOAA shipwreck database information to mark obstructions. Navigational obstruction are avoided during training exercises to ensure the safety of the trainees.

The Navy's analysis of the proposed undertaking is based on these primary characteristics of the training: 1) all operations will be designed to ensure the trainees leave no trace of their presence during or after the training activity, including potential effects to historic properties; 2) there is no use of live-fire ammunition, explosives, ground disturbance, off-road driving, digging, tree climbing, construction, or the building of campfires or infrastructure; 3) the training will fully avoid most historic properties, and where training occurs in and around historic properties, it will follow Cultural Resource Stipulations identified in installation Integrated Cultural Resource Management Plans or best management practices (BMPs) established for the historic property identified in real estate agreements to ensure no effects to the characteristics qualifying them for the National Register of Historic Places; 4) Navy support personnel will accompany all training teams to provide additional protection against unauthorized activities with the potential to affect historic properties; and 5) Navy cultural resources professionals will review specific training exercises to provide additional guidance on avoidance.

e. Will watercrafts drive onto shore anywhere within the APE without use of a boat ramp? If so, please indicate where and what measures will be implemented to avoid impacts to historic properties.

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(1) RESPONSE: Water-based training activities would use existing government and public boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. In this case, the training platform is launched from a small ship directly into the water.

f. At any time during the proposed training will training equipment be dropped from the air?

(1) RESPONSE: The proposed action does not include dropping training equipment from the air.

g. What is the anticipated duration of the proposed undertaking?

(1) RESPONSE: Analysis of the proposed undertaking was conducted for development of the Environmental Assessment. Although the proposed undertaking has no maximum duration, the Navy recognizes that the SHPO has concerns with an on-going training due to changes in eligibility of sites as they become older than 50 years of age and changing perception of historic properties, and therefore agrees to review the Section 106 consultation with the SHPO 15 years following receipt of SHPO's concurrence letter. Prior to the 15 year review, reinitiation of the Section 106 process would be warranted if there is a change in the undertaking or the area of potential effect (APE).

h. How will the Navy ensure training will not affect the road barricade complex and aircraft revetments at the Pacific Missile Range on Kauai?

(1) RESPONSE: Training may occur around the road barricade complex and aircraft revetments on Kauai; however, per earlier Section 106 correspondence (Ser N4/0450, 22 March 2019), the undertaking will have no effect upon them as defined in §800.16(i) since the training will not alter the characteristics qualifying the historic property for inclusion in or eligibility for the National Register pursuant to §800.4. The NSWC small unit teams will operate to leave no trace (not modify the road barricade complex or aircraft revetments) of their presence during or after the training activity, and the undertaking does not include construction.

i. The Navy states a copy of the subject letter was forwarded to additional consulting parties as part of the Section 106 consultation process for the proposed undertaking; please provide documentation of any additional comments or concerns received by consulting parties during the allotted 30-day period as those comments would otherwise not be taken into consideration by our office during our review of the proposed project.

(1) RESPONSE: One comment was received from the Kekumano 'Ohana thanking the Navy (Enclosure 4).

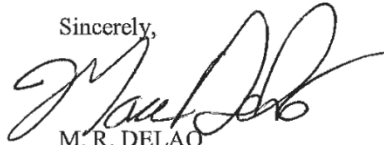
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In addition to the questions asked in the letter, discussion with the Archaeology Branch Chief and Staff included a request for an annual report that provides information regarding the number of training events annually and whether any historic properties were adversely affected during training. The Navy recognizes the need for the SHPO to work with the Navy to ensure that we are good stewards of the lands and waters we train on; and therefore the Navy will provide brief information regarding impacts, although unlikely, to historic properties as well as brief training information as releasable by OPSEC. This report on Naval Special Operations Training in Hawaii will be included in the Commander, Navy Region Hawaii, Cultural Resources Management On-Site meeting supported by Naval Facilities Engineering Command, Hawaii, EV5, held once a year to fulfill the annual cultural resources program reporting requirement.

In consideration of this information, the Navy has determined that the proposed undertaking will result in no adverse effect to historic properties in accordance with the NHPA Section 106 Implementing Regulations at 36 CFR 800.5(b) since the Navy finds that there are historic properties present but the undertaking will not alter directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration is given to all qualifying characteristics of a historic property, including those that may be identified subsequent to the original evaluation of the property's eligibility for the National Register.

I respectfully request your review and concurrence within 30 days of receipt of this letter. My point of contact is Mr. Alvin Capili of NAVFAC Hawaii's Environmental Planning Division. He can be reached at (808) 471- 8550 or email at alvin.capili@navy.mil should you require additional information.

Sincerely,



M. R. DELAO
Captain, CEC, U.S. Navy
Regional Engineer
By direction of the
Commander

- Enclosures:
1. References
 2. Historic Properties located within the APE
 3. Post-Review Discovery Procedures
 4. Kekumano 'Ohana Response

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Enclosure 2. Historic properties identified within the Area of Potential Effect (APE) (Locations where activities are proposed within Historic Properties shown in Blue Text).

Hawaii Island

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Ala Kahakai Trail		Ala Kahakai National Historic Trail Act, Public Law 106-509-Nov. 13, 2000	National Historic Trail designated in 2000; discontinuous trail 175-mile long that is classified as a district; part of the Ala Loa (long trail) that circles the island; several sections of the trail are listed in the NRHP as individual properties	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Hale Halawai O Holualoa		NRHP #87000794	A, C; also known as the Holualoa Stone Church Ruins, a meeting house constructed in the early 1850s on the north shore of Holualoa Bay	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kalaloa Permanent House Site		NRHP #73000654	D; traditional Hawaiian village site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kawaluna Heiau	SIHP # 50-10-27-19796	Assumed Eligible*	D; Enclosure with burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kiholo-Puako Trail or Ala Loa (long trail) Trail		NRHP #87001127	A; a coastal trail in South Kohala that extends from Kiholo Bay to Kalahuipaua near Puako	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Ko'a of Halepau	SIHP #50-10-27-2139	Assumed Eligible*	A, D; Fishing Heiau and Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
Mailekini Heiau	SIHP #50-10-27-13584	Assumed Eligible*	A, D; Heiau Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Old Kawaihae-Puako Road	SIHP #50-10-27-14057	Assumed Eligible*	D; Road	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1878	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1879	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1880	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1881	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1882	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1883	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1884	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1885	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1886	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1887	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1888	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1890	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1891	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1892	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1905	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1906	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1907	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1909	Assumed Eligible*	D; Heiau	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1910	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1911	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1912	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1913	Assumed Eligible*	D; Heiau	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1914	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1915	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-1916	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-2001	Assumed Eligible*	D; Petroglyphs	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-2002	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-2140	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4123	Assumed Eligible*	D; Salt Pan	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4681	Assumed Eligible*	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4682	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4688	Assumed Eligible*	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4689	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-4690	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-5666	Assumed Eligible*	D; Trail (historic)	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6444	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6491	Assumed Eligible*	D; Modified Overhang	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6492	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6493	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6494	Assumed Eligible*	D; Pond	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6499	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6502	Assumed Eligible*	D; Sealed Overhang	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6503	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6516	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6518	Assumed Eligible*	D; Habitation Complex with Trail	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6520	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6524	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6525	Assumed Eligible*	D; Burial Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6526	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6527	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6666	Assumed Eligible*	D; Paving	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6667	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6668	Assumed Eligible*	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6669	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6672	Assumed Eligible*	D; Paving	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6673	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6674	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6676	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-6677	Assumed Eligible*	D; Paving	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-7149	Assumed Eligible*	A, D; Hawaiian Railroad Company Terminal and Harbor Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-7351	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-7355	Assumed Eligible*	D; C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SHP #50-10-05-4157	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-18-5354	Assumed Eligible*	D; Lava tube shelters	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10181	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10232	Assumed Eligible*	D; Two platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10234	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10235	Assumed Eligible*	D; Anchialine Pond	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10236	Assumed Eligible*	D; Two enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10237	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10238	Assumed Eligible*	D; Cave and enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10239	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10241	Assumed Eligible*	D; Two enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10242	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10243	Assumed Eligible*	D; Habitation and trail	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-10244	Assumed Eligible*	D; Caves	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13560	Assumed Eligible*	D; Habitation complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13572	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13573	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13574	Assumed Eligible*	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13577	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13578	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13579	Assumed Eligible*	D; Habitation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13580	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13581	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13582	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13583	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13585	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13587	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13588	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13589	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13590	Assumed Eligible*	D; Cairn	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13591	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13592	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13593	Assumed Eligible*	D; Complex with terrace and uprights	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13594	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13595	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13597	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13598	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13599	Assumed Eligible*	D; Heiau and Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13600	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13601	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13602	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13603	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13606	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13607	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13610	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13615	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13647	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13650	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13651	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13653	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13936	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13937	Assumed Eligible*	D; Enclosure and terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13938	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13939	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13948	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13948	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13950	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13952	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13953	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13956	Assumed Eligible*	D; C-shape and alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13957	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13958	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13959	Assumed Eligible*	D; C-shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13961	Assumed Eligible*	D; Midden deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13962	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13963	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-13980	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14622	Assumed Eligible*	D; Modified pond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14630	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14632	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14671	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14827	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14828	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-14831	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-15132	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-15133	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16048	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16067	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16068	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16069	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16132	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16190	Assumed Eligible*	D; Anchialine Pond Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-16191	Assumed Eligible*	D; Anchialine Pond Complex	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18775	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18776	Assumed Eligible*	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18808	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18810	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18814	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18815	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18816	Assumed Eligible*	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18818	Assumed Eligible*	D; Complex with Modified Outcrop, Cairn, and Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18819	Assumed Eligible*	D; Walled Shelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18820	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18822	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18825	Assumed Eligible*	D; Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-18829	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-19796	Assumed Eligible*	D; Enclosure with Burial	No effect; activities not proposed here, therefore no alteration to characteristics of

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Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
				historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-19797	Assumed Eligible*	D; Petroglyphs	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-27307	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-10-27-30224	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Steam screw-Kaua'i	NOAA #375	Assumed eligible*	D; steamship named after the island of Kauai; sank off of Mahukona Port Dec 24, 1913	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.

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Kauai

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Kawaiele Ditch	SIHP #50-30-05-0721	Eligible	A; Agricultural/ plantation drainage ditch. Excavated in 1878 to drain Kawaiele Pond to drain marshland for sugar cultivation	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kinkini Ditch		Eligible	A; Plantation Era Ditch through the dune to drain marshland for sugar	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Ditch		Eligible	A; Plantation Era Ditch excavated in 1922 through the dune to drain marshland for sugar	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Dune	SIHP # 50-30-01-0007	Eligible	ancient burial ground within Nohili Dune (50-30-01-1860)	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
'Elekuna Heiau	SIHP # 50-30-01-0008	Eligible	D; inland side of Nohili Dune site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Dune	SIHP # 50-30-01-0009	Eligible	D; House sites; inland side of Nohili Dune (Site 1-1860)	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Site	SIHP #50-30-05-1829	Eligible	D; Habitation Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Nohili Site	SIHP # 50-30-05-1830	Eligible	D; cultural deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Dune	SIHP #50-30-01-1860	Assumed eligible*	D; Nohili Dune site includes Sites 01-007, 01-0008, 01-0009, and 01-6027	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nohili Site	SIHP #50-30-01-6027	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Polihale Heiau	BPBM #50-Ka-C07-002	Assumed Eligible*	A four-terraced Heiau located on the seashore at the base of Polihale Cliff	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2007	Eligible	A, D; World War II Era Pillbox	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2008	Eligible	A, D; Concrete Box for Fuel Delivery	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP # 50-30-01-2013	Eligible	A; metal gun turret	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2017	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-30-01-2019	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2021	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2023	Eligible	A, D; Concrete box, associated with early World War II-era development	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP # 50-30-01-2027	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2028	Eligible	A; Gun Emplacement	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2032	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2033	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-01-2034	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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SIHP #50-30-01-2036	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
SIHP #50-30-01-2037	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
SIHP #50-30-01-2038	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
SIHP #50-30-01-2039	Eligible	A; Horseshoe Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
SIHP #50-30-01-2040	Eligible	A; Double Horseshoe or M Shaped Revetment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
SIHP #50-30-01-2047	Eligible	A; Gun Emplacement	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
SIHP #50-30-01-2048	Eligible	A, C; World War II Era Pillbox	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
SIHP #50-30-01-2050	Eligible	A, C; Concrete (fuel delivery) tank	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-30-05-0616	Assumed Eligible*	D; Japanese Plantation Cemetery	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-0825	Assumed Eligible*	D; Unmarked Cemetery	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-0826	Eligible	D; Habitation Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1831	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1833	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1834	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1884	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-1885	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-30-05-2003	Eligible	D; 1930s trash dump	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-2031	Eligible	D; Midden Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP # 50-30-05-2035	Eligible	D; midden deposit and burials;	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-30-05-4016	Eligible	D; Firepit Remnant; early evidence of human activity	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP# 50-30-05-5031	Eligible	D; subsurface pit features, midden deposit, and cultural materials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Lanai

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Pu'upehe Platform		NRHP #86002745	D; Platform located on seastack	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP.

Maui

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Aircraft- F6F Hellcat	NOAA #866	Assumed eligible*	A; World War II era fighter aircraft in Maalaea Harbor	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP.

Oahu

Name	Site Number	National Register Information	Eligibility Analysis	Effect on Historic Properties
Facility S359 (Ford Island building/structure)		Contributing*	A, C; Seaplane Ramp 3, Runway "C." built in 1930; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility S360 (Ford Island building/structure)		Contributing*	A, C; Seaplane Ramp 4 built in 1930; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP

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Facility 55 (Ford Island building/structure)		Contributing*	A, C; Barracks, Enlisted Quarters E1/E4; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 1745 (Ford Island building/structure)		Contributing*	A, C; Army hangar, biplane; contributing element to Ford Island and the Pearl Harbor National Historic Landmark	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 2 (Luahalei Naval Magazine building/structure)		Eligible	A, C; Security HQS Police Station, originally dispensary; built in 1933; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 2A (Luahalei Naval Magazine building/structure)		Eligible	A, C; Security HQS Police Station, originally dispensary records room; built in 1933; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3 (Luahalei Naval Magazine building/structure)		Eligible	A, C; Enlisted men's quarters; built in 1932; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 4 (Luahalei Naval Magazine building/structure)		Eligible	A, C; Storehouse, heavy metals; originally a garage; built in 1933	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 68 (Luahalei Naval Magazine building/structure)		Eligible	A, C; Transmitter building; built in 1944; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP

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Facility 5A (Luahalei Radio Transmitter building/structure)		Eligible	A, C; Marine barracks built in 1935; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 6 (Luahalei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 7 (Luahalei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 8 (Luahalei Radio Transmitter building/structure)		Eligible	A, C; Jr Officers Quarters built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 9 (Luahalei Radio Transmitter building/structure)		Eligible	A, C; Jr Officers Quarters built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 10 (Luahalei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 11 (Luahalei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP

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Facility 12 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Enlisted housing built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 22 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 23 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 24 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 25A (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Detached passenger car garage built in 1938; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 68 (Lualualei Radio Transmitter building/structure)		Eligible	A, C; Transmitter building built in 1944; vacant	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 11 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Facility 35 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Facility 39005 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Facility 39006 (Kaena Point Satellite Tracking Station)		Eligible	A; Historic Building	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kaneohe Naval Air Station (NAS) NHL		NHL #87001299	A; Historic district comprised of aircraft hangars, seaplane ramps, and a parking apron that was part of Japanese attack on Kaneohe NAS on 7 December 1941	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 1 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 2 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 3 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 4 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP

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Facility 5 (MCBH Seaplane Ramp)		NHL #87001299	A; Seaplane ramp constructed in 1940, part of Kaneohe Naval Air Station NHL	No effect; swimming and diving around the seaplane ramps will not affect the characteristics of the historic ramps that qualify it for inclusion in NRHP
Facility 149		Eligible	A; Fuel pier constructed in 1941	No effect; swimming and diving around the fuel pier will not affect the characteristics of the historic pier that qualify it for inclusion in NRHP
Aircraft- PBY Catalina		Eligible	A, D; Aircraft sunk during the 7 December 1941 attack of NAS Kaneohe	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Chinatown Historic District		NRHP #73000658	A, C; ca. 36 acres in the city of Honolulu and borders Honolulu Harbor and reflects a contiguous architectural and historic character of the early 20 th century	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Ala Moana Beach Park (Art-Deco Parks)	SIHP #80-14-1388	Listed on State Register	A, C; Beach park	No effect; over the beach activities consistent with the use as a public beach; no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Aloha Tower		NRHP #76000660	A, C; Aloha Tower at Pier 9, Honolulu Harbor, is a 184 foot, 10-storied concrete tower completed in 1926; became a symbol of Hawaii's investment in tourism and was the landmark of Honolulu's waterfront area	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Barbers Point Archaeological District	SIHP #50-80-12-2888	Assumed Eligible*	D; Traditional Hawaiian Sites in Ewa	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Hasebrouck (Fort Kamehameha)	SIHP #50-80-13-1560	NRHP #84000925	A, C; constructed between 1909 and 1914. It is one of several batteries as a part of the	No effect; activities not proposed here, therefore no alteration to characteristics of

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			coastal artillery batteries to defend Pearl Harbor.	historic property qualifying it for inclusion in NRHP
Battery Hawkins (Fort Kamehameha)	SIHP #50-80-13-1602	NRHP #84000928	A, C; constructed in 1914. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Hawkins Annex (Fort Kamehameha)	SIHP #50-80-13-1603	NRHP #84000948	A, C; artillery District of Honolulu TR	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Jackson (Fort Kamehameha)	SIHP #50-80-13-1601	NRHP #84000954	A, C; constructed in 1914. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Battery Selfridge (Fort Kamehameha)	SIHP #50-80-13-1600	NRHP #84000975	A, C; constructed between 1907 1913. It is one of several batteries as part of the coastal artillery batteries to defend Pearl Harbor.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Facility 3341H (Fort Kamehameha)		NRHP District #84000925	A, C; non-contributing element of the Fort Kamehameha District; constructed in 1916 as SAN Sewage Pump STN 27;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3342H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3343H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP

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Facility 3344H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3345H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3346H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3347H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3348H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Facility 3349H (Fort Kamehameha)		NRHP District #84000925	A, C; contributing element of the Fort Kamehameha District; constructed in 1916 as housing; currently a Base Supply and Equip Shed;	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Battery Randolph (Fort DeRussy)	SIHP #50-80-08-1607	NRHP # 84000971	A, C; artillery District of Honolulu TR	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Charles and Mae Boettcher Residence	SIHP #50-80-11-9760	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Falls of Clyde		NHL #73000659	A; iron-hulled, four-masted full rigged ship built in 1878	No effect; moored in Honolulu Harbor; Navy is not proposing to train or test near this resource.
Farrington Highway	SIHP #50-80-07-6824	Assumed Eligible*	D; Farrington Highway, constructed in the 1930s as part of the Territorial Highway System	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Haleiwa Beach Park (Art-Deco Parks)	SIHP #50-80-04-1388	Listed on State Register	A, B; Beach park constructed in 1939; designed by architect Harry S. Bent	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
He'eia Fishpond	SIHP #50-80-10-0327	NRHP #73000671	D; Traditional Hawaiian fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Hickam Field		NRHP #85002725	A; established southeast of Pearl Harbor Naval Base and was one of the installations attacked on 7 December 1941	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
"Hilltop House," "Pu'uhonua," or "Bird Lady's House"	SIHP #50-80-11-9009	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Huilua Fishpond	SIHP #50-80-06-0301	NHL #66000295	Listed on NRHP	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kahalu'u Fishpond	SIHP #50-80-10-0319	NRHP #73000668	Listed on NRHP	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Kalou Fishpond	SIHP #50-80-01-0257	Listed on State Register	D; the fishpond was used in aquaculture and illustrates the intimate knowledge of sea husbandry, engineering, and conservation that was attained by the ancient Hawaiians	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kaneohe Naval Air Station		NRHP #87001299	A; one of the first installations attacked on December 7 1941 and brought the United States into World war II	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Kapapa Island Complex		NRHP #72000430	D; a traditional Hawaiian ceremonial site on an island in Kaneohe Bay	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kealakipapa Road	SIHP #50-80-15-0003	Assumed Eligible*	D; Stone Paved Road near Wāwāmālu	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Keawaula Complex	SIHP #50-80-03-2805	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Ko'amanō Reef	SIHP #50-80-10-0325	Assumed Eligible*	D; Reef used in traditional Hawaiian fishing practices	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kolea Koa	SIHP #50-08-03-0195	Assumed Eligible*	D; Koa or shrine	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Kuakea Koa	SIHP #50-08-03-0193	Assumed Eligible*	D; Kuakea Fishing Shrine	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Kū'ihioloa Heiau	SIHP #50-80-07-153	Assumed Eligible*	A, D; Restored heiau with open terrace and three platforms, Pokai, Waianae	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Landing craft- LC Pearl Channel	NOAA #885	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Landing craft- LC Pearl Harbor	NOAA #908	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Landing craft- Pearl Channel 1	NOAA #883	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Landing craft- Pearl Channel 2	NOAA #884	Assumed eligible*	A, D; World War II era ramped landing craft (LC)	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Laulaunui Fishpond	SIHP #50-80-13-0140	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Amana	SIHP #50-80-13-0097	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Loko Apala	SIHP #50-80-09-0118	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Hanaloa	SIHP #50-80-13-0125	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kaaokuu	SIHP #50-80-13-0126	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kamakupohaku	SIHP #50-80-09-0104	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Ke'oki	SIHP #50-80-13-0095	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko'ea Fishpond	SIHP #50-80-04-0233	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kuhialoko	SIHP #50-80-09-0119	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Kunana/Loko Muliwai	SIHP #50-80-13-0102	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Loko Papioula	SIHP #50-80-13-0096	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Pöhaku	SIHP #50-80-13-0098	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Waiaho	SIHP #50-80-13-0094	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Wailowai	SIHP #50-80-13-0100	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Loko Weloko	SIHP #50-80-09-0116	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mākaha Bridge 3	SIHP #50-80-07-6822	Assumed Eligible*	A, D; Bridge constructed in 1937	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mākaha Bridge 3a	SIHP #50-80-07-6823	Assumed Eligible*	A, D; Bridge constructed in 1937	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Makapuu Road	SIHP #50-80-15-7310	Eligible	A, D; Historic Road	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Makapu'u Point Light		NRHP #77000447	A; Lighthouse at Makapu'u built in 1909	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Makapu'u Point Light Station	SIHP #50-80-15-7311	Eligible	A, D; Habitation & operational support for the Makapu'u Light	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Makapuu Point Military Reservation	SIHP #50-80-15-7312	Eligible	A, D; Defensive structures as part of the coastal defense system	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mark Robinson Beach House	SIHP #50-80-11-9748	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mauna Lahilahi Point		Eligible*	A; D; traditional cultural place described as a <i>ka 'ānani 'au</i> —religious and cultural landscape marker; petroglyphs carved into the eastern side; a possible heiau, stone platforms, and shrines are located on the mountain; used as a lookout; important fishing grounds.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Merchant Street Historic District		NRHP #73000661	C; an area within Honolulu that was once the financial and governmental part of the city and is what remains of "old" Honolulu	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Moana Hotel		NRHP #72000417	A, C; designed by the notable architect O. G. Traphagen and built in 1901; one of Honolulu's "high-rise" buildings and one of the oldest hotels in Waikiki, serving as a link to the development of the tourist industry	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Mokeana Heiau	SIHP #50-80-03-0188	Eligible	A, D; Heiau at Kaeina Point Satellite Tracking Station	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mokumanu underwater cave		Assumed eligible*	D; cave is off the coast of Mokapu Peninsula on the windward side of Oahu; the cave features in Hawaiian legends of this period; the cave is underwater along the shore and will not be impacted by the training and testing activities	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Mōli'i Fishpond	SIHP #50-80-06-0313	NRHP # 72000429	Listed on NRHP	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Nu'upia Fishpond Complex	SIHP #50-80-11-1002	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Oahu Rail and Land (OR&L) Right of Way	SIHP #50-80-12-9714	NRHP #75000621	A, B, C; the OR&L Right of Way is 15 miles long; it is one of the longest stretches of narrow-gauge operable railroad track still in place in the United States	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
'Ōki'okilepe Pond	SIHP #50-80-13-0143	NRHP #73000673	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
O'ohope Fishpond	SIHP #50-80-10-0337	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Pa'aiau Fishpond	SIHP #50-80-13-0108	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of

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				historic property qualifying it for inclusion in NRHP
Pāhōnu Turtle Pond	SIHP #50-80-15-1037	Listed on State Register	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Pamoku Fishpond	SIHP #50-80-13-0142	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Robert McCorrison Beach House	SIHP #50-80-11-9763	Listed in State Register	C; Historic House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Submarine- Japanese Type A- sank 1941	NOAA #740	Assumed eligible*	A, D; World War II Japanese midget submarine sunk outside the entrance of Pearl Harbor on December 7th, 1941 by the destroyer USS Ward.	No effect; located under the water in an area where ships transit; no effect anticipated to the submerged cultural resource lying on the seafloor; the Navy is not proposing to train or test on the or near this resource.
Submarine- Type A (stem-section)- sank 1941	NOAA #525	Assumed eligible*	D; Five Ko-Hyoteki or Target Type-A Japanese midget submarine. Five midget subs took part in the event on December 7, 1941. This is part of a 3 -piece site, possibly salvaged from Pearl Harbor and disposed.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
U.S. Coast Guard Makapuu Light House	SIHP #50-80-15-1355	NRHP #77000447	A; the lighthouse has the largest lens of any lighthouse in the United States and its location on the Island of Oahu is considered to be of vital importance to maritime commerce.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
'Uko'a Fishpond	SIHP #50-80-04-0236	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of

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				historic property qualifying it for inclusion in NRHP
USS Arizona Memorial		NRHP #66000944	A; constructed to recognize the valor of those who were attached in Pearl harbor, Oahu on 7 December 1941 and marks the resting place of the USS Arizona	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
USS Arizona Wreck		NHL #89001083	A, C, D; Battleship that was attacked and sank on 7 Dec 1941; it is a major shrine and point of remembrance for the lost battleship and the entire attack	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
U.S.S. Bowfin	SIHP #50-80-13-1356	NHL #82000149	A; World War II Fleet Type American Submarine; 1 of 15 remaining submarines of this type	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
U.S.S. Missouri Battleship	SIHP #50-80-13-9817	NRHP #71000877	A; Battleship that hosted the signing of Japanese surrender that ended World War II	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
USS Utah Wreck		NHL #89001084	A, C, D; focal point of a shrine erected to honor Utah's crew, some of whom lost their lives while trying to save their torpedoed ship during the Japanese attack	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
U.S. Naval Base Pearl Harbor	SIHP #50-80-13-9992	NRHP #66000940	A, C; large, landlocked port that contributed to the rise of the United States as a major world war power in the Pacific and for most of the century it has sheltered, armed, and repaired naval ships, submarines, and aircraft. The attack on 7 December 1941 focused on Pearl Harbor	No effect; proposed activities will not alter the characteristics of the historic property that qualify it for inclusion in the NRHP
Waianae District		NRHP #74000720	D; a traditional Hawaiian village site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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Waiānā District Park	SIHP #50-80-12-3967	Assumed Eligible*	D; Encompasses Sites 4822-4826; sinkholes, enclosures, wells (sinks with water), mounds, walls, and a burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Waikalua Fishpond	SIHP #50-80-10-0349	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
Waikīkī Fishing Grounds- identified by accumulation of stone breadfruit-type (octopus) sinkers		Assumed eligible*	D; fishing grounds with associated stone sinkers provides information on traditional Hawaiian fishing techniques.	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
World War I Memorial Natatorium		NRHP #80001283	A, C; constructed in 1927 as a World War I memorial; an open air structure with an ocean-fed pool and Beaux-Arts inspired main entry on west side of Kapiolani Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-03-3714	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-03-3715	Eligible	A, D; World War II Winching Station Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-03-3716	Eligible	A, D; Historic Ranch Structure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-03-5467	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of

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				historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-0235	Assumed Eligible*	D; Stone at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5489	Assumed Eligible*	D; Historic House Site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5490	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5493	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5494	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5495	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5561	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-04-5641	Assumed Eligible*	A, D; World War II Structure Remnants at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5642	Assumed Eligible*	A, D; World War II Structure Remnants at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5643	Assumed Eligible*	A, D; World War II Structure Remnants at Haleiwa Beach Park	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5644	Assumed Eligible*	D; Historic Trash Dump	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5791	Assumed Eligible*	A, D; OR&L Right of Way	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5795	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5850	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-5915	Assumed Eligible*	D; Basalt Boulder Structure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-04-5916	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-6401	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-04-7604	Assumed Eligible*	D; Sugarcane Road	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-0176	Assumed Eligible*	D; Salt basins along the beach; in the lava rocks projecting above the sand in Ohikilolo	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4064	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4822	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4823	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4824	Assumed Eligible*	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-07-4825	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-4826	Assumed Eligible*	D; L-Shaped Habitation Feature	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6634	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6635	Assumed Eligible*	D; Historic Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6704	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6705	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-07-6825	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1823	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-1866	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1868	Eligible	D; C-Shapes and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1879	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1880	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1941	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1946	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-1966	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5973	Eligible	D; Mounds	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-5974	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5975	Eligible	D; Mounds	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5976	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5977	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5978	Eligible	D; C-Shapes and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5979	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5980	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5982	Eligible	D; Modified Outcrop	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-5983	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5984	Eligible	C; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5985	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5986	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5989	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5990	Eligible	D; Habitation/Agriculture Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5991	Eligible	D; Terrace and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5992	Eligible	D; Depression	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-5993	Eligible	C; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5997	Eligible	D; Terraces and C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5998	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-5999	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6000	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6002	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6003	Eligible	D; Rockshelter and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6004	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6005	Eligible	D; Terraces, C-Shape, and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6007	Eligible	D; C-Shapes and Platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6008	Eligible	D; Terraces and Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6009	Eligible	D; Mounds and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6011	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6012	Eligible	D; Terrace and Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6014	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6015	Eligible	D; Terrace, Depressions, and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6016	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6017	Eligible	D; Terrace and Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6018	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6019	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6020	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6021	Eligible	A, D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6022	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6023	Eligible	D; Mounds, Terraces, and Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6024	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6025	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6026	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6027	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6028	Eligible	D; Terraces and Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6031	Eligible	D; Enclosures, Terraces, and C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6033	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6034	Eligible	D; Rockshelters	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6035	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6036	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6037	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6039	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6040	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6041	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6042	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6043	Eligible	D; Rockshelters	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6044	Eligible	D; Terraces and Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6045	Eligible	D; C-Shape and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6046	Eligible	D; C-Shapes, Terraces, and Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6047	Eligible	D; Rockshelter and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6048	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6050	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6053	Eligible	A, D; Platforms and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6054	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6055	Eligible	D; Rockshelter and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6056	Eligible	D; Enclosure and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6057	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6058	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6059	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6061	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6062	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6063	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6064	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6065	Eligible	D; Terraces and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6066	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6067	Eligible	D; Rockshelter and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6068	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6069	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6070	Eligible	D; C-Shape and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6071	Eligible	A, D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6072	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6073	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6075	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6077	Eligible	D; Terraces and Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6078	Eligible	D; Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6079	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6080	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6081	Eligible	D; Terrace and Uprights	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6082	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6083	Eligible	D; C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6084	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6085	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6086	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6087	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6088	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6089	Eligible	D; Alignment	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6091	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6092	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6094	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6095	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6096	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6097	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6098	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6100	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6101	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6102	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6104	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6105	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6106	Eligible	D; Rockshelter and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6107	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6108	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6109	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6110	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6111	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6112	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6113	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6114	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6115	Eligible	D; Enclosures and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6116	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6118	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6119	Eligible	C; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6120	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6121	Eligible	A, D; Enclosures, Terraces, and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6122	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6123	Eligible	D; Alignments and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6124	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6125	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6126	Eligible	A, D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6128	Eligible	D; Terraces and Depressions	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6129	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6130	Eligible	A, D; Enclosure and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6131	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6132	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6133	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6134	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6135	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6136	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6137	Eligible	A, D; Enclosures, Terraces, and Platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6138	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6139	Eligible	A, D; Enclosures and Mounds	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6140	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6141	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6142	Eligible	A, D; Platforms	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6143	Eligible	A, D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6144	Eligible	A, D; Terrace, Mounds, and C-Shape	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6145	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6146	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6147	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6148	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6148	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6149	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6150	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6151	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6152	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6153	Eligible	D; Modified Outcrop, Walls, and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6155	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6156	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6157	Eligible	A, D; Platform and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6158	Eligible	A, D; Enclosures, Platforms, and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6159	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6160	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6161	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6162	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6163	Eligible	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6164	Eligible	A, D; Enclosures and Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6165	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6166	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6167	Eligible	A, D; Ditch and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6168	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6169	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6170	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6171	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6172	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6173	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6174	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6175	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6176	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6177	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6179	Eligible	A, D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6180	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6181	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6182	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6183	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6184	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6185	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6186	Eligible	A, D; Enclosures, Mounds, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6187	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6188	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6189	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6190	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6191	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6192	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6193	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6194	Eligible	C; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6195	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6196	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6197	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6198	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6199	Eligible	A, D; Enclosures and Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6200	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6201	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6202	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6203	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6205	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6206	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6207	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6208	Eligible	D; C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6209	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6210	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6211	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6212	Eligible	D; Rockshelters, Enclosures, and Walls	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6213	Eligible	D; Enclosures and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6214	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6215	Eligible	A, D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6216	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6217	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6219	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6220	Eligible	D; Enclosure and C-Shapes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6221	Eligible	A, D; Enclosures and Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6222	Eligible	D; Rockshelters, Enclosures, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6223	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6224	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6225	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6226	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6227	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6228	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6229	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6230	Eligible	D; Rockshelters, Enclosures, Pavements, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6231	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6232	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6233	Eligible	A, D; Enclosures, Modified Outcrops, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6234	Eligible	A, D; Enclosures, C-Shapes, Platforms, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6235	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6236	Eligible	D; C-Shapes and Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6237	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6238	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6239	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6242	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6244	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6245	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6246	Eligible	D; C-Shapes and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6247	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6248	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6249	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6250	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6251	Eligible	D; Enclosure and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6252	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6253	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6254	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6255	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6256	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6257	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6258	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6259	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6260	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6261	Eligible	D; Enclosures, Walls, and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6262	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6263	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6265	Eligible	D; Enclosures	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6266	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6267	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6270	Eligible	D; Walls and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6271	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6272	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6273	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6274	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6275	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6276	Eligible	A, D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6277	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6278	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6279	Eligible	A, D; C-Shapes and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6280	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6281	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6282	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6282	Eligible	D; Enclosures and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6283	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6284	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6285	Eligible	D; C-Shapes and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6286	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6287	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6291	Eligible	D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6292	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6294	Eligible	A, D; Platforms and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6295	Eligible	A,D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6296	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6297	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6298	Eligible	D; Walls and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6299	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6302	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6303	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6304	Eligible	A, D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6307	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6308	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6310	Eligible	A, D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6311	Eligible	A, D; Mounds and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6312	Eligible	A, D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6314	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6316	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6318	Eligible	D; Rockshelter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6322	Eligible	D; Ditches and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6327	Eligible	D; Enclosure and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6328	Eligible	D; Platforms and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6332	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6333	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6334	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6335	Eligible	D; Rockshelters and Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6336	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6337	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6338	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6339	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6339	Eligible	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6343	Eligible	D; Wall and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6346	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6348	Eligible	D; Wall	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6353	Eligible	A, D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6355	Eligible	A, D; Pavement, Ditches, Mounds, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6356	Eligible	D; Wall and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6357	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6358	Eligible	D; Rockshelters	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6360	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-08-6362	Eligible	A, C, D; Enclosures, Mounds, Walls, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6364	Eligible	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6365	Eligible	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-08-6367	Eligible	D; C-Shape, Rockshelters, and Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-0336	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-3322	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-3323	Assumed Eligible*	D; Fishpond	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP # 50-08-03-3747	Assumed eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-08-03-5467	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-08-03-5599	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-08-03-6638	Assumed Eligible*	D; Buried cultural deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-08-03-6708	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-09-7150	Assumed Eligible*	D; Agricultural Soil	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4119	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4120	Assumed Eligible*	D; Platform	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4135	Assumed Eligible*	D; Terraces	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-10-4136	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4140	Assumed Eligible*	D; Terrace	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4144	Assumed Eligible*	D; Upright Stone	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-10-4671	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-3993	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-4222	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-4453	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-4691	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-11-4864	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-5770	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-5771	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6642	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6770	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6770	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6818	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6818	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-11-6921	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6937	Listed in State Register	C; Miles and Kathy Anderson House	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6937	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6967	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-6967	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7032	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7054	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7174	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-11-7175	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-11-7175	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-1752	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-1754	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-1755	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-2220	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-3358	Assumed Eligible*	D; Midden Scatter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-3361	Assumed Eligible*	D; Midden Scatter	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-12-4526	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-5130	Assumed Eligible*	D; Sinkhole	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-6592	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-6876	Assumed Eligible*	D; Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-6877	Assumed Eligible*	D; C-Shaped Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-6878	Assumed Eligible*	D; Sinkholes	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-7672	Assumed Eligible*	D; Ranch Features likely associated with Campbell Cattle Ranch	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-7673	Assumed Eligible*	A; Sewage Septic Treatment System structure associated with the former Army Installation of Camp Malakole	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-12-9617	Assumed Eligible*	D; Habitation Complex	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-9633	Assumed Eligible*	D; Burial Cave	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-12-9714	Assumed Eligible*	A, D; 20th century Sugar Plantation infrastructure consisting of OR&L spur right-of-way and bridge	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-3703	Assumed Eligible*	D; Burial	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-4499	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-5218	Assumed Eligible*	D; Mound	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-5874	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-13-5875	Assumed Eligible*	D; Post-Contact Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-13-6907	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-0512	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-0513	Assumed Eligible*	D; Burials	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-3989	Eligible	D; Cave	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-5939	Assumed Eligible*	D; Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-7313	Eligible	A, D; Plane Crash Site	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-7314	Eligible	D; Military Support	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-15-7315	Eligible	D; Solar Observatory	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

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	SIHP #50-80-15-7409	Eligible	D; Rock Enclosure	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP
	SIHP #50-80-7418	Assumed Eligible*	D; Buried Cultural Deposit	No effect; activities not proposed here, therefore no alteration to characteristics of historic property qualifying it for inclusion in NRHP

* Assumed eligible: The site appears to meet the NRHP eligibility criteria per § 800.4(c)(2); however, as the site is not on Navy controlled property, formal evaluation has not been conducted (16 USC 470h-2(a)(1)). However, pursuant to 16 USC 470h-2(C); the Navy recognizes that the preservation of properties not under the jurisdiction or control of the agency, but subject to be potentially affected by agency actions are given full consideration in planning.

Enclosure 3. Post-Review Discovery Procedures

The following procedures are based on CFR36 800.13, Post-review discoveries. During Naval Special Operations Training in Hawaii, it is unlikely that historic properties will be discovered or disturbed. However, in the event that new historic properties are identified in the training area or historic properties are inadvertently disturbed, the following post-review discovery procedures shall be followed, which will include the reasonable efforts to avoid, minimize or mitigate adverse effects to such properties.

During Naval Special Operations Training in Hawaii, if any potential historic property (including graves, petroglyphs, artifacts such as tools, bottles, or fishhooks, shell midden, stone alignments, stone platforms, or any physical remains of habitation or human activity more than 50 years old) are disturbed during training action or related activity, the Officer-In-Charge or other responsible individual shall cease activity in the area, mark the area to prevent further disturbance, and notify the Navy cultural resources professional at 808-471-4945 or 808-474-9019. The training action or related activity shall not resume in the vicinity of the discovery until the Navy cultural resources professional provides written authorization.

The Navy cultural resource professional shall investigate the discovery. All identification, evaluation, and treatment efforts shall be conducted under the supervision of personnel who meet applicable professional qualifications. Personnel who conduct identification, evaluation, or treatment of potential historic properties shall meet the qualification standards established by the Office of Personnel Management for their respective disciplines in accordance with Section 112 of the National Historic Preservation Act (NHPA; 54 U.S.C. 306131).

The Navy cultural resource professional shall examine the discovery and the surrounding area to determine if the discovery warrants formal documentation as a potential historic property.

If the discovery is not a potential historic property (modern or natural occurrence), the Navy cultural resource professional shall document as a memorandum to record and provide written authorization to resume the training.

If the discovery is a potential historic property, the Navy cultural resource professional shall document the property using written descriptions, photographs, and measurements as appropriate and will create a plan map illustrating the property boundary, the location of features and artifacts within the property, the general topography, and the relationship of the property to any other sites, buildings, objects or reference points in the area. In addition, the discovery will be recorded using global information system (GPS) data, to include the site boundary and location of artifacts, features, and relevant reference points in the landscape.

The Navy cultural resource professional will ensure that the landowner is notified about the potential historic property following protocols identified in the real estate agreements.

The Navy cultural resource professional shall notify the State Historic Preservation Officer (SHPO) about the potential historic property discovery by email or letter within five (5) business days and in that notification shall propose a consultation meeting with the SHPO within 30 days

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to discuss National Register eligibility and develop a management plan specific to the discovery, if necessary. The Navy Region Commander shall decide if the training may resume in the vicinity of the discovery based on the consultation and any resulting management plan.

Any newly-discovered potential historic property shall be treated as an eligible historic property until the Navy consults with the Hawaii SHPO on the National Register eligibility and the resolution of adverse effects is appropriate.

If osteological materials (human remains) are identified as part of the discovery, the osteological materials will be immediately protected from damage and exposure to the elements and the Naval Criminal Investigative Service and Navy cultural resource professional shall be notified (OPNAVINST 11170.2B), and if the osteological materials are located off of Navy land, the local police shall be notified as appropriate. If the discovery is not of a criminal matter, the Navy cultural resource professional shall assess the antiquity and/or cultural affiliation of the remains based on the context and associated material. If the antiquity/cultural affiliation of the remains cannot be determined, Native Hawaiian affiliation will be presumed. The Navy shall follow the regulations of the Native American Graves Protection and Repatriation Act (NAGPRA; 25 U.S.C. 32), as specified in 43 CFR 10.4.

Training activities in the vicinity of the discovered human skeletal remains shall not resume until written authorization is provided by the Navy Region Commander.

Enclosure 3
Page 2 of 2

Enclosure 4. Email from Kekumano 'Ohana.**Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA)**

From: Cy Harris <ckharris800@gmail.com>
Sent: Thursday, April 4, 2019 9:55 PM
To: Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (US)
Subject: [Non-DoD Source] Re: Continuing Section 106 consultation for Naval Warfare Command Training at Select Locations in Hawaii

Thank you.

On Wed, Mar 27, 2019 at 6:17 PM Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (US) <coral_rasmussen@navy.mil> wrote:

Aloha-

The Navy Special Warfare Command is proposing to conduct training at select locations in Hawaii. Additional information regarding this proposed undertaking is included in the attached Section 106 letter.

If you have any comments or would like to provide information, please respond within 30 days.

Thank you,

Coral Rasmussen

Coral Rasmussen

Archaeologist

NAVFAC Pacific 258 Makalapa Dr. Ste 100

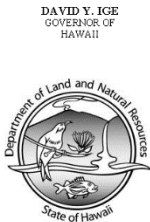
Pearl Harbor, HI 96860

coral_rasmussen@navy.mil

Phone: (808) 472-1432

DSN: (315) 472-1432

A.3.6 Hawaii SHPD Letter of Concurrence and Determination of No Adverse Effect to Historic Properties from Proposed Naval Special Operations Training in Hawaii (29May20)



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
KAKUIHEWA BUILDING
601 KAMOKILA BLVD., STE 555
KAPOLEI, HI 96707

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LAWS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

May 29, 2020

Captain M. R. Delao
Department of the Navy
Commander Navy Region Hawai'i
850 Ticonderoga Street Suite 110
JBPHH, Hawai'i 96860-5101
Email Reply to: Alvin Capili (Alvin.Capili@navy.mil)

IN REPLY REFER TO:
Log No.: 2020.00704
Doc. No.: 2005SH21
Archaeology

Dear Captain Delao:

SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review – Continued Consultation and Request for Concurrence with the Effect Determination Proposed Naval Special Operations Training in Hawai'i
Ref. No. 5750 N4
Various Ahupua'a, Various Districts, Statewide
TMK: Oahu: (1) 3-9-011, (1) 4-1-014, (1) 4-1-001, (1) 4-1-002, (1) 4-1-003, (1) 4-1-004, (1) 4-1-005, (1) 4-1-006, (1) 4-1-007, (1) 4-1-014, (1) 4-1-015, (1) 4-2-002, (1) 4-3-001, (1) 4-3-003, (1) 4-3-004, (1) 4-3-005, (1) 4-3-006, (1) 4-3-007, (1) 4-3-008, (1) 4-3-009, (1) 4-3-010, (1) 4-3-011, (1) 4-3-012, (1) 4-3-013, (1) 4-3-015, (1) 4-3-016, (1) 4-3-017, (1) 4-3-018, (1) 4-3-019, (1) 4-3-020, (1) 4-3-022, (1) 4-3-083, (1) 4-4-008, (1) 4-4-039, (1) 4-5-001, (1) 4-6-005, (1) 4-6-007, (1) 4-6-016, (1) 4-6-019, (1) 4-6-022, (1) 5-9-004, (1) 6-1-001, (1) 6-1-013, (1) 6-2-001, (1) 6-2-002, (1) 6-8-003, (1) 6-8-006, (1) 6-8-011, (1) 6-9-001, (1) 6-9-003, (1) 8-1-001, (1) 8-2-001, (1) 8-3-001, (1) 8-3-010, (1) 8-4-001, (1) 8-4-002, (1) 8-4-004, (1) 8-4-005, (1) 8-4-006, (1) 8-4-007, (1) 8-4-008, (1) 8-4-010, (1) 8-4-012, (1) 8-4-019, (1) 8-4-030, (1) 8-5-001, (1) 8-5-002, (1) 8-5-008, (1) 8-5-011, (1) 8-6-015, (1) 8-5-017, (1) 8-6-001, (1) 8-6-015, (1) 8-6-016, (1) 8-7-005, (1) 8-7-006, (1) 8-7-007, (1) 8-7-008, (1) 8-7-015, (1) 8-7-016, (1) 8-7-023, (1) 8-7-028, (1) 8-9-001, (1) 8-9-006, (1) 9-1-001, (1) 9-1-013, (1) 9-1-014, (1) 9-1-015, (1) 9-1-017, (1) 9-1-056, (1) 9-1-057, (1) 9-2-049, (1) 9-3-001, (1) 9-3-002, (1) 9-6-001, (1) 9-6-003, (1) 9-7-008, (1) 9-8-019, (1) 9-9-001, (1) 9-9-003
Moloka'i: (2) 5-1-002, (2) 5-3-001, (2) 5-4-002
Hawai'i: (3) 5-7-001, (3) 5-7-003, (3) 5-8-001, (3) 5-9-003, (3) 5-9-016, (3) 5-9-017, (3) 6-1-001, (3) 6-1-003, (3) 6-1-004, (3) 6-2-002, (3) 7-2-004, (3) 7-2-005, (3) 7-2-010, (3) 7-2-017, (3) 7-2-019, (3) 7-2-040, (3) 7-3-009, (3) 7-3-043, (3) 7-3-063, (3) 7-4-008, (3) 7-5-005, (3) 7-5-006, (3) 7-5-007, (3) 7-5-008, (3) 7-5-009
Kaua'i: (4) 1-2-001, (4) 1-2-002

On March 27, 2020, the State Historic Preservation Division (SHPD) received a letter March 24, 2020 from the United States Department of the Navy to continue Section 106 consultation and provide additional information requested by the SHPD for the Proposed Naval Special Operations Training across the state of Hawai'i.

In 2019, the Navy submitted a letter to SHPD dated March 22, 2019 to initiate Section 106 consultation for the proposed project and requested the SHPO's concurrence with their effect determination. The SHPO responded in a letter dated April 20, 2019 requesting additional information (SHPD Log. No. 2019.00682, Doc. No. 1904SH09). Subsequently a meeting was held between the Navy and their representatives and SHPD staff at the SHPD office in

Captain M. R. Delao
May 29, 2020
Page 2

Kapolei on October 17, 2019 to discuss the requested information and to consult regarding the project scope and SHPD's concerns with protecting historic properties statewide.

In a letter dated April 27, 2020, the SHPD stated that the Navy's responses addressed the concerns raised regarding the potential to impact historic properties by the proposed actions. However, the SHPO requested the Navy consult with the SHPD every 7 years following concurrence of the proposed undertaking rather than every 15 years as proposed. Additionally, the SHPO requested the Navy provide an example of the information that will be provided regarding this undertaking and historic properties during the Commander, Navy Region Hawaii, Cultural Resources Management On-Site meeting supported by Naval Facilities Engineering Command, Hawaii, EV5.

In an email dated May 6, 2020 the Navy agreed to consult with the SHPD every 7 years following the SHPO's concurrence with the effect determination for the proposed undertaking. Additionally, the Navy developed an excel table depicting the information that will be provided at the annual Cultural Resources Management On-Site meeting. The SHPD replied on May 14, 2020 with a request for minor revisions to the information content to be provided in the excel table and the Navy revised the table as requested in an email dated May 21, 2020. On May 29, 2020, the Navy confirmed the information to be presented in the excel table will be submitted to SHPD annually following the SHPO's concurrence with the Navy's effect determination, regardless of whether the annual meeting is held (email correspondence Coral Rasmussen [Navy] to Susan Lebo and Stephanie Hacker [SHPD]).

The Navy has determined the proposed undertaking will result in *no adverse effect* to historic properties. Based on the above as well as the previous information provided by the Navy describing the efforts to avoid impact to historic properties, **the SHPO concurs** with the determination of *no adverse effect* for the proposed undertaking.

The Department of the Navy is the office of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at Stephanie.Hacker@hawaii.gov or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha,
Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Coral Rasmussen, Navy (Coral.Rasmussen@navy.mil)

A.3.7 County of Hawai'i, Cultural Resources Commission Request for More Information Regarding the Final EA for Proposed Naval Special Operations Training in Hawaii (1Sep20)

Harry Kim
Mayor



County of Hawai'i

PLANNING DEPARTMENT
CULTURAL RESOURCES COMMISSION
Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawai'i 96720
Phone (808) 961-8288 • Fax (808) 961-8742

Geraldine Bell, Chair
Angela Fa'anunu, Vice Chair
Alex Akau
Theresa Donham
Kilohana Hirano
Natalie Kurashima
Nicole Lui
Scott Mahoney

September 1, 2020

Ms. Margherita Parrent
Deputy Facilities Director
Naval Special Warfare Group 3
Bldg 455 Hornet Ave Suite 323
Joint Base Pearl Harbor-Hickam, HI 96860-3530

Dear Ms. Parrent:

Subject: Naval Special Operations Training in Hawaii – Cultural Resources Commission (CRC) Section 106 Consultation for the Final Environmental Assessment (FEA)
Location: Island of Hawai'i, Hawai'i

The Cultural Resources Commission of the Island of Hawaii (CRC), at its scheduled meeting of August 26, 2020 reviewed and deliberated the information provided in response to a previous CRC letter dated January 7, 2019. At that meeting staff presented a number of documents to commission members, however there are still some issues that need to be addressed in the Final Environmental Assessment (FEA) prior to publication. The CRC requests a response to the following prior to submitting their recommendation to the Planning Director regarding the subject Naval special operations training.

Anchialine ponds:

It was stated by the Navy that: "training would not occur within or the immediate vicinity of ponds, including anchialine ponds. Training would only occur on lands and waters where there is a right-of-entry or other real estate agreement with a willing property owner or property manager." The CRC would like more specific information regarding the mapped location of privately owned Anchialine ponds in relation to training locations to review the appropriate buffer and avoidance strategies.

Ms. Margherita Parrent
Page 2
September 1, 2020

Canoe activities:

The CRC believes that potential impacts to canoe paddling from the proposed training activities were not adequately discussed in the information provided; the public also shared these concerns. The CRC requests a more thorough discussion on how the proposed training will not interfere with paddling activities, how interactions between training activities and paddlers will be handled, and what paddlers can expect (i.e., notification, appropriate signage, etc.).

West Hawaii Regional Fishing Management Area:

The CRC concurs with the Department of Land and Natural Resources (DLNR) Division of Aquatic Resources (DAR) that *no training activities should be conducted in the area of the West Hawaii Regional Fishing Management Area (WHRFMA)* in order to minimize impacts to areas with dense fishing activity and significant subsistence fishing. The CRC would also like to review the Navy's response to the DAR comment letter dated 6/18/2019.

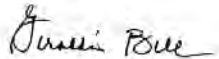
Lack of complete Final EA:

The CRC believes that there should be a more complete draft of the Final Environmental Assessment (FEA) Finding of No significant Impact (FONSI) presented for review instead of the piecemeal information provided to confirm that potential cultural and historical impacts have been discussed and properly mitigated. Public comments received and the responses to those comments should also be clearly presented, especially for Hawai'i Island specific concerns such as burials, subsistence rights, and public access along the shoreline. The information provided references a FEA, but none was provided, therefore the CRC requests a more complete document for review. Additionally, materials provided in digital format should be in a searchable pdf or word format.

The CRC believes the preservation of historic and cultural sites are paramount to the ongoing and future use of Hawai'i Island. Mahalo for your support to the CRC, its mission, and your continued coordination in the protection, preservation, and evaluation of cultural and historic resources on Hawai'i Island.

Should you have any questions regarding this letter, please contact CRC staff member Alex Roy at 961-8140 or at alex.roy@hawaiicounty.gov.

Me ka pono,



GERALDINE BELL, Chairperson
Hawai'i County Cultural Resources Commission

AJR:kt

cc via email: Hawai'i County Cultural Resources Commission
cc via letter: Planning Director

A.3.8 Department of the Navy Responses to the 1 September 2020 County of Hawai'i, Cultural Resources Commission Request for More Information Regarding Proposed Naval Special Operations Training in Hawaii (23Oct20)

Navy Responses to September 1, 2020 CRC Letter Re NSO Training, Island of Hawaii (23 Oct 2020)

1. **Anchialine ponds:** It was stated by the Navy that: "training would not occur within or the immediate vicinity of ponds, including anchialine ponds. Training would only occur on lands and waters where there is a right-of-entry or other real estate agreement with a willing property owner or property manager." The CRC would like more specific information regarding the mapped location of privately owned Anchialine ponds in relation to training locations to review the appropriate buffer and avoidance strategies.

Navy Response: The Navy is not proposing any NSO training activities within or adjacent to any areas where anchialine ponds are present. Three public sites are proposed for training on the Island of Hawaii: Kawaihae Harbor, Honokohau Small Boat Harbor, and Mahukona Beach Park/Harbor. Proposed NSO training activities in Kawaihae Harbor and Honokohau Small Boat Harbor would only occur within the harbors and therefore would not impact anchialine ponds. Proposed training activities at Mahukona Beach Park/Harbor would include use of a submersible and personnel swimming in the nearshore waters and harbor, and over-the-beach training at the park. Because there are no anchialine ponds within Mahukona Beach Park, there would be no impacts to ponds from the proposed training activities.

2. **Canoe activities:** The CRC believes that potential impacts to canoe paddling from the proposed training activities were not adequately discussed in the information provided; the public also shared these concerns. The CRC requests a more thorough discussion on how the proposed training will not interfere with paddling activities, how interactions between training activities and paddlers will be handled, and what paddlers can expect (i.e., notification, appropriate signage, etc.).

Navy Response: Proposed NSO training activities are not expected to impact any canoe club's paddling activities. To understand a canoe club's concerns, on August 19, 2020 we consulted with Mr. Manny Vincent, President of the Kawaihae Canoe Club. He stated that the majority of the canoe club's activities take place between 6:00 a.m. and 6:00 p.m. daily during February through October. The proposed NSO training activities would occur from dusk to dawn, outside of the typical time of canoe club activities, and therefore the Navy does not anticipate any interaction with or impacts to paddlers. The proposed training would not limit or close access to any areas used by the public. For each proposed training scenario two small boats would accompany the trainees. The responsibility of one of the boats and crew is to monitor the trainees and ensure their safety. The other boat and crew will watch the training area to ensure that the public does not interact with the training. If a fisherman or canoe paddler enters the training area, the Navy crew would watch the progress of the vessel; if it started to get close to the trainees, the lookout boat would approach the vessel. They would inform the fisherman or paddlers that Navy training is taking place and ask if they could temporarily halt their transit or change direction. If the response is no, the Navy would then either stop their training and wait until the public transits the area, or the Navy would stop the training altogether and move to another site. The training support vessels will follow all US Coast Guard procedures for marine vessels on public waterways.

3. **West Hawaii Regional Fishing Management Area:** The CRC concurs with the Department of Land and Natural Resources (DLNR) Division of Aquatic Resources (DAR) that no training activities should be conducted in the area of the West Hawaii Regional Fishing Management Area (WHRFMA) in order to minimize impacts to areas with dense fishing activity and significant subsistence fishing. The CRC would also like to review the Navy's response to the DAR comment letter dated 6/18/2019.

Navy Response: Attached is DAR's October 11, 2020 final updated determination where they state on pdf page 7: "The FMA portion which DAR has requested no activity be conducted is the orange polygon delineated in the maps of Kawaihae Harbor in Appendix (see the following figure). Final determination: Activities in the outer areas of Kawaihae Harbor (outside the orange polygon) have been approved as proposed by the Navy in DAR's original comments: "Kawaihae Harbor (No "Over Beach"- no activity inside FMA portion – outer harbor only-except for using boat launch)... Navy should consult with DOBOR (State Division of Boating and Ocean Recreation) and consult with the Kawaihae Canoe Clubs for the use of the small boat harbor."



Proposed NSO training activities would occur only within the outer harbor and boat launch, and would not occur within the Kawaihae Harbor FMA (delineated in above figure) per DAR's requirement. In addition, per the original request from DAR, the Navy consulted with the National Park Service (NPS). The proposed training area does not include any property or waters under NPS jurisdiction, and they had no issues with the proposed NSO training activities. Finally, upon completion of the Final EA, the Navy will consult with DOBOR during the right-of-entry permit process.

4. **Lack of complete Final EA:** The CRC believes that there should be a more complete draft of the Final Environmental Assessment (FEA) Finding of No significant Impact (FONSI) presented for review instead of the piecemeal information provided to confirm that potential cultural and historical impacts have been discussed and properly mitigated. Public comments received and the responses to those comments should also be clearly presented, especially for Hawai'i Island specific concerns such as burials, subsistence rights, and public access along the shoreline. The information provided references a FEA, but none was provided, therefore the CRC requests a more complete document for review. Additionally, materials provided in digital format should be in a searchable pdf or word format.

Navy Response: We are unable to provide a draft of the FEA or FONSI because they are currently being updated and finalized by the Navy under the NEPA process. The FEA will have appendices containing: all public comments received on the Draft EA and the Navy's responses to those comments, all agency correspondence and associated consultations under Section 106 of the National Historic Preservation Act, Coastal Zone Management Act, section 7 of the Endangered Species Act (marine and terrestrial species), Marine Mammal Protection Act, Magnuson-Stevens Fishery Conservation and Management Act, as well as additional consultations with interested parties, stakeholders, and Native Hawaiian Organizations. We can provide you a copy of the Final EA once it's been published.

A.3.9 NHPA Section 106 Notification: Proposed Naval Special Operations Training in Hawaii, Notification of Additional Consultations (10Mar21)



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45A
N45
March 10, 2021

Dr. Alan Downer
Deputy State Historic Preservation Officer
Department of Land and Natural Resources
Kakuhihewa Building, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

SUBJECT: NATIONAL HISTORIC PRESERVATION ACT (NHPA) SECTION 106 NOTIFICATION:
PROPOSED NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN HAWAII,
NOTIFICATION OF ADDITIONAL CONSULTATIONS

Dear Dr. Downer:

In accordance with 36 CFR Part 800, the United States (U.S.) Department of the Navy (Navy) is notifying your office of additional consultations regarding the Proposed NSO Training in Hawaii that took place after the Hawaii State Historic Preservation Officer's (SHPO's) concurrence (Log No.: 2020.00704/Doc. No.: 2005SH21 dated 29 May 2020).

During the public review period for the Draft Environmental Assessment (EA) for Naval Special Operations Training in Hawaii, we received requests from Native Hawaiian Organizations (NHOs) and individuals to be consulting parties under NHPA Section 106. The Navy consulted with a number of parties on Molokai (e.g., 'Āina Momona, Molokai Aha Kiole, etc.), Alapaki Nahale-a (Kamehameha Schools, Hawaii Island), and Kauai Trainer (Hawaii Island). These consultations took place from August through October 2020. The enclosure presents a summary of these consultations. It is noted that participant discussions included mention of Section 106, Hawaii Revised Statutes (HRS) Chapter 6E Historic Preservation, National Environmental Policy Act (NEPA), and/or Hawaii Environmental Policy Act (HEPA) requirements. The Navy is including all information obtained from those consultation calls for SHPO's awareness and consideration in the context of its review of this action under Section 106.

Should your staff have any questions or concerns, please contact Mr. Jeff Pantaleo of NAVFAC Hawaii's Environmental Planning Division. He can be reached at (808) 471-4945, or by email at jeff.pantaleo@navy.mil.

Sincerely,

ENG.SHERRI.R
Digitally signed by
ENG.SHERRI.R.1229438936
.1229438936
Date: 2021.03.10 08:02:15
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SHERRI R. ENG
Director
Regional Environmental Department
By direction of the
Commander

Enclosure: Summary of Consultations with 'Āina Momona, Alapaki Nahale-a, and Kauai Trainer.

Enclosure: Summary of Consultations with 'Āina Momona, Alapaki Nahale-a, and Kauai Trainer.

Individual/Organization	NHO Comments	Navy	Date
-A. Nahale-a, Kamehameha Schools	Concern that the Navy would deviate from the training discussed and wanted to know how the Navy will be held accountable. Concern that the language in the EA is vague and open to interpretation, such as the words "typically" and "we are not planning." Why are you not doing an EA for each training location? Concerned that military training will be taking place on private land and public shorelines and that the training will impact sites. Concern that the area identified in the EA is too general to provide feedback on the cultural resources, and that training could be authorized at any location within the APE; there may be concern with the time of day, fishing seasons, and religious practices	The Navy will adhere to what is presented in the EA and the activities that have been assessed and analyzed. We are analyzing all activities together in one EA, which enables us to address the additive impacts across the state. Three locations for proposed training were discussed for the Island of Hawaii, including Kawaihae Harbor, Honokohau, and Mahukona Beach Park. The goal of the training is to not leave a sign of the trainees' presence, during or after the training. Identification of historic properties within the training areas indicates that the training is not anticipated to alter the characteristics that make historic properties eligible for the National Register. Training will only occur at these locations upon approval of the landowners and with the proper permits.	08/12/20 (phone call)
- W. Ritte, 'Āina Momona - K. Rawlins-Fernandez, Maui County Council - L. Buchanan, Molokai Aha Kiole - T. Kehaulani Watson, 'Āina Momona - Mahina Poepe - J. Caparida - Sol Kaho'ohalahala, Lanai County - M. Akutagawa, Molokai Representative, Humpback Whale Nat'l Marine Sanctuary Advisory Council - C. Schnackenberg, Ahonui Homestead Association	Did not think that the EA was well-prepared, concern with the Humpback Whale Sanctuary, concern about submarine training (photo provided of breaching submarine) indicating that training already taking place, identification of historic sites, difference between Section 106 and 6E, gathering rights and disruption of traditional gathering, and previous military use noting that there is heavy opposition in the community to the proposed training.	The proposed action analyzed in the EA is to provide training to NSO trainees in the Hawaiian Islands. All of the military activities the Navy proposes to conduct in the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final Environmental Impact Statement (EIS)/Management Plan for the Sanctuary, which under the Marine Sanctuary regulations do not require permits or further consultation under section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The activities proposed in the EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 Hawaii-Southern California Training and Testing Final EISs and, therefore, consultation is not required. NSO Training does not include training with the type of submarine that was depicted in the photograph and is not currently training in the waters off of Molokai. The Navy	08/13/20 (phone call)

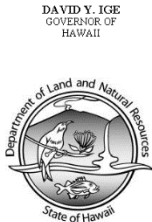
Enclosure: Summary of Consultations with 'Āina Momona, Alapaki Nahale-a, and Kauai Trainer.

Individual/Organization	NHO Comments	Navy	Date
		explained that the phone call was to follow-up with Molokai representatives and residents regarding their comments on the November 2018 Draft EA for NSO Training in Hawaii, and enquire if there were any concerns regarding cultural resources, noting that following the Section 106 consultation, we would be consulting with respect to HRS Chapter 6E (Historic Preservation). Due to the request by the NHOs at the end of the call, the Navy agreed to another call under Section 106 during which we would listen and consider comments and provide a reasonable opportunity for the call participants to identify their concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, and articulate their views on the undertaking's effects on such properties per Section 800.2.	
- Kauai Trainer, a practitioner and lineal descendant of the areas on the islands of Hawaii, Molokai, and Oahu	Concern regarding homeless Hawaiians, bombing of Kahoolawe Island, and the overthrow of the Hawaiian Kingdom, noting that the US occupation of Hawaii is illegal.	Navy listened to concerns.	08/14/2020 (phone call)
- Alapaki Nahale-a', Kamehameha Schools - Sommerset Wong, Kamehameha Schools	Concern with the large APE identified in the EA for Hawaii Island.	Navy indicated that the training would be limited to Honokohau and Kawaihae Harbors and Mahukona Beach Park, providing we receive permission to utilize these properties. The Navy has removed the National Parks and historic trails from the training areas, so training activities would not take place in these areas. It was noted that NHPA Section 106 consultation has been completed and we received concurrence from the Hawaii SHIPO. Following the signing of a Finding of No Significant Impact (FONSI), the Navy would apply for use permits, which would require HRS Chapter 6E coverage.	09/30/2020 (phone call)
- L. Buchanan, Molokai Aha Kiole - T. Kehaulani Watson, 'Āina Momona - Mahina Poepe - P. Nihipali - C. Schnackenberg, Ahonui Homestead Association	Wanted clarification on where the area of impact is located, identified Hale O Lono as eligible for the NRHP, noted that the harbor belongs to Molokai and is only held in trust by DLNR; concerned with noise from Marine Corps helicopters resulting from	Following the meeting on 08/13/2020, the Navy reduced the APE on Molokai based on the input received. Hale O Lono was added to the list of eligible historic properties. The Navy would not be altering any of the characteristics of the harbor that make it eligible for listing on the NRHP. The Navy listened to the concerns	10/22/2020 (phone call)

Enclosure: Summary of Consultations with ‘Āina Momona, Alapaki Nahale-a, and Kai Trainer.

Individual/Organization	NHO Comments	Navy	Date
	<p>MV22 and HMLA EIS; would like to have consultation through the Department of the Interior (DOI); suggested having a community cultural monitor on site during the training activities; asked if the support vessels or trainees would be armed; asked how they would force people out of the water during the training exercises; asked if there is a penalty if the Navy does not keep to their agreement with how the training is to be conducted.</p>	<p>regarding noise from Marine Corps MV-22 aircraft flying over Molokai. Regarding consultation through the DOI, the Navy follows the Section 106 process as identified in Section 800, which identifies procedures on how Federal agencies meet statutory responsibilities and are talking to Molokai residents in order to determine if there is any additional information that they may be able to provide. Due to operational security concerns during training activities, the public is not notified or involved in the training. Neither the trainees nor support vessels would be armed. If the public is using the training area when the Navy has training underway, the training would either be paused until the people leave or would move to another location. The Navy intends to follow the requirements identified during the NEPA process. Regarding the historic properties in Hawaii, the Navy would update the Hawaii SHPO annually on the historic properties within the training areas and, if historic properties are inadvertently adversely affected, the Navy would work with the Hawaii SHPO to mitigate the affect following Section 800.13(b).</p>	
<ul style="list-style-type: none"> - L. Buchanan, Molokai Aha Kiole - T. Kehaulani Watson, ‘Aina Momona - Mahina Poeepoe - P. Nihipali - C. Schnackenberg, Ahonui Homestead Association - K. Rawlins-Fernandez, Maui County Council - K. Opele, Molokai resident 	<p>Concern that they were not participants early in the Section 106 process; concern that the Navy is reducing the size of the APE on Molokai; concern that there are <i>koa</i> or religious sites in the ocean and outside the harbors that are important and secret, noting that the Navy does not understand the cultural perspective of indigenous Hawaiians; also indicated that they want the Navy to leave the people of Molokai alone, adding that there are still bombs on Molokai because of the military.</p>	<p>The Navy listened to the concerns of the NHO on Molokai. The Navy considers all information provided by the NHO, including information received following concurrence from the Hawaii SHPO. The APE was reduced following earlier discussions with the Molokai NHO in order to take into account their comments, and since the Navy is reducing the size of the proposed training area, there would be less effect. The Navy acknowledges that there are secret religious sites in the waters off of Molokai and outside of the harbors and intends to avoid identified eligible and listed historic properties in Hawaii.</p>	<p>10/29/2020 (phone call)</p>

A.3.10 SHPO Response to 10 March 2021 Letter from the Navy re: Notification of Additional Consultations (20Apr21)



DAVID Y. IGE
GOVERNOR OF
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD., STE 555
KAPOLEI, HI 96707

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONSERVATION
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CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

April 20, 2021

Sherri R. Eng
Director, Regional Environmental Department
Navy Region Hawai'i
Department of the Navy
850 Ticonderoga Street Suite 110
JBPHH, Hawai'i 96860-5101
Email Reply Only to: Jeff.Pantaleo@navy.mil

IN REPLY REFER TO:
Project No.: 2020PR23811
Submission No.: 2020PR32811.002
Doc No.: 2104SH11
Archaeology

Dear Sherri R. Eng:

SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review – Continued Consultation and Notification of Additional Consultation Proposed Naval Special Operations (NSO) Training in Hawai'i Ref. No. 5000-45A N45 Various Ahupua'a, Various Districts, Statewide

TMK: Oahu: (1) 3-9-011, (1) 4-1-014, (1) 4-1-001, (1) 4-1-002, (1) 4-1-003, (1) 4-1-004, (1) 4-1-005, (1) 4-1-006, (1) 4-1-007, (1) 4-1-014, (1) 4-1-015, (1) 4-2-002, (1) 4-3-001, (1) 4-3-003, (1) 4-3-004, (1) 4-3-005, (1) 4-3-006, (1) 4-3-007, (1) 4-3-008, (1) 4-3-009, (1) 4-3-010, (1) 4-3-011, (1) 4-3-012, (1) 4-3-013, (1) 4-3-015, (1) 4-3-016, (1) 4-3-017, (1) 4-3-018, (1) 4-3-019, (1) 4-3-020, (1) 4-3-022, (1) 4-3-083, (1) 4-4-008, (1) 4-4-039, (1) 4-5-001, (1) 4-6-005, (1) 4-6-007, (1) 4-6-016, (1) 4-6-019, (1) 4-6-022, (1) 5-9-004, (1) 6-1-001, (1) 6-1-013, (1) 6-2-001, (1) 6-2-002, (1) 6-8-003, (1) 6-8-006, (1) 6-8-011, (1) 6-9-001, (1) 6-9-003, (1) 8-1-001, (1) 8-2-001, (1) 8-3-001, (1) 8-3-010, (1) 8-4-001, (1) 8-4-002, (1) 8-4-004, (1) 8-4-005, (1) 8-4-006, (1) 8-4-007, (1) 8-4-008, (1) 8-4-010, (1) 8-4-012, (1) 8-4-019, (1) 8-4-030, (1) 8-5-001, (1) 8-5-002, (1) 8-5-008, (1) 8-5-011, (1) 8-6-015, (1) 8-5-017, (1) 8-6-001, (1) 8-6-015, (1) 8-6-016, (1) 8-7-005, (1) 8-7-006, (1) 8-7-007, (1) 8-7-008, (1) 8-7-015, (1) 8-7-016, (1) 8-7-023, (1) 8-7-028, (1) 8-9-001, (1) 8-9-006, (1) 9-1-001, (1) 9-1-013, (1) 9-1-014, (1) 9-1-015, (1) 9-1-017, (1) 9-1-056, (1) 9-1-057, (1) 9-2-049, (1) 9-3-001, (1) 9-3-002, (1) 9-6-001, (1) 9-6-003, (1) 9-7-008, (1) 9-8-019, (1) 9-9-001, (1) 9-9-003

Moloka'i: (2) 5-1-002, (2) 5-3-001, (2) 5-4-002

Hawai'i: (3) 5-7-001, (3) 5-7-003, (3) 5-8-001, (3) 5-9-003, (3) 5-9-016, (3) 5-9-017, (3) 6-1-001, (3) 6-1-003, (3) 6-1-004, (3) 6-2-002, (3) 7-2-004, (3) 7-2-005, (3) 7-2-010, (3) 7-2-017, (3) 7-2-019, (3) 7-2-040, (3) 7-3-009, (3) 7-3-043, (3) 7-3-063, (3) 7-4-008, (3) 7-5-005, (3) 7-5-006, (3) 7-5-007, (3) 7-5-008, (3) 7-5-009

Kaua'i: (4) 1-2-001, (4) 1-2-002

The State Historic Preservation Division (SHPD) received a letter dated March 10, 2021 from the Department of the Navy to notify the State Historic Preservation Officer (SHPO) of additional consultation carried out between the Navy and Native Hawaiian Organizations (NHOs) and individuals regarding the Proposed Naval Special Operations Training in Hawai'i. The SHPD received this submittal on March 17, 2021.

The SHPO concurred with the Section 106 effect determination, *no adverse effect*, in a letter dated May 29, 2021 (Navy Ref. No. 5750 N4; SHPD Log No. 2020.00704, Doc. No. 2005SH21). According to the Navy's letter, the Navy consulted with a number of parties representing the island of Molokai between August and October 2020. The

Sherri R. Eng
April 20, 2021
Page 2

Navy has provided summaries of comments received for “SHPO’s awareness and consideration in the context of its review of this action under Section 106.”

In response, the SHPD was made aware in October 2020 that at least one request to be a consulting party to the Section 106 process was overlooked by the Navy and therefore, the Navy held a meeting to allow several individuals the opportunity to comment. It is the SHPD’s understanding that at that time, the Navy noted they were not reopening the Section 106 process. It is the SHPO’s opinion that in order to conduct a reasonable and good faith effort, the Section 106 process must take into account information and concerns raised by the public and consulting parties, including NHOs that might attach religious and cultural significance to properties within the area of potential effects, to afford the opportunity to minimize, mitigate, and avoid impacts to historic properties. The SHPO recommends the Section 106 process is formally reopened and the Navy assess any information received regarding the potential identification of historic properties, including those of traditional religious and cultural importance.

Please submit all forthcoming information and correspondence related to the subject project, including the Navy’s annual report for this undertaking, to the SHPD HICRIS system under Project 2020PR32811 using the Project Supplement option.

The Navy is the office of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at Stephanie.Hacker@hawaii.gov or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha,
Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Katharine Kerr, Advisory Council on Historic Preservation (kkerr@achp.gov)

A.3.11 Navy Response to 20 April 2021 Letter from SHPO re: Notification of Additional Consultations (4May21)

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45A
N45
May 4, 2021

Dr. Alan Downer
Deputy State Historic Preservation Officer
Department of Land and Natural Resources
Kakuhihewa Bldg, Room 555
601 Kamokila Boulevard
Kapolei, HI 96707

**SUBJECT: NATIONAL HISTORIC PRESERVATION ACT (NHPA) SECTION 106
NOTIFICATION: PROPOSED NAVAL SPECIAL OPERATIONS (NSO)
TRAINING IN HAWAII, NOTIFICATION OF ADDITIONAL CONSULTATIONS
Project No.: 2020PR23811 Submission No.: 2020PR32811.002 Doc No.: 2104SH11**

Dear Dr. Downer:

Thank you for your letter dated April 20, 2021 responding to our March 10, 2021 letter, regarding the Navy's notification of additional consultation conducted under the Section 106 process for the subject undertaking. Our letter was not a request for Section 106 review, but was intended to notify SHPO that we received additional input from Native Hawaiian Organizations and provide a summary of that input. The Navy considered input regarding historic properties, and provided clarification about where training would occur within the Area of Potential Affect (APE). The Navy also received input regarding sites of traditional religious and cultural importance in the waters off of Molokai. However, NHO indicated that they would not be disclosing site locations.

SHPO concurred with our determination of no adverse effect in May of 2020. We have considered your suggestion to reopen the Section 106 process and do not believe it is warranted because there are no changes to the proposed action and no new information that changes our determination of effect. Should your staff have any questions or concerns, please contact Mr. Jeff Pantaleo of NAVFAC Hawaii's Environmental Planning Division. He can be reached at (808) 471-4945, or by email at jeff.pantaleo@navy.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "S. Eng", written over a white background.

SHERRIL R. ENG
Director
Regional Environmental Department
By direction of the
Commander

A.4 COASTAL ZONE MANAGEMENT ACT (CZMA)**A.4.1 CZMA Negative Determination Letter, Naval Special Operations Training in Hawaii – Federal Lands (23Jan19)**

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101



5090
Ser N45/0410
January 23, 2019

CERTIFIED NO: 7016 0910 0001 0892 1557

Mr. Leo R. Asuncion, Director
Office of Planning, State of Hawaii
Coastal Zone Management Program
P.O. Box 2359
Honolulu, Hawaii 96804

SUBJECT: Coastal Zone Management Act (CZMA) Negative Determination Letter, Naval Special Operations Training, State of Hawaii

Dear Mr. Asuncion:

In accordance with the Federal Coastal Zone Management Act of 1972 (CZMA) as amended, Section 307c(1), the United States (U.S.) Department of the Navy (Navy) has determined that naval special operations training conducted on Federal lands throughout the State of Hawaii will not affect the coastal uses or resources and therefore, does not require a consistency determination.

Activities on Federal land that are included on the "*Navy/Marine Corps De Minimis Activities Under CZMA*" have already been submitted and concurred with by the Hawaii Coastal Zone Management (CZM) Program. Per the July 9, 2009 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed activities are subject to and bound by full compliance with the "Project Mitigation/General Conditions."

Federal lands that are not included in the "*Navy/Marine Corps De Minimis Activities Under CZMA*" are included in this "Negative Determination." These lands include U.S. Coast Guard Station Barbers Point and the Kanes Drop Zone at Kahuku Training Area.

Non-federal lands in the training study area will be evaluated in a separate *Federal Consistency Determination*.

PROJECT DESCRIPTION

See Attachment 1 for a full project description.

Federal lands included in this "Negative Determination" include U.S. Coast Guard Station Barbers Point and the Kanes Drop Zone.

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Proposed activities at U.S. Coast Guard Station Barbers Point include:

- Insertion and Extraction
- Over the Beach
- Special Reconnaissance
- Unmanned Aerial System

Proposed activities at Kanes Drop Zone include:

- Landing/Drop Zone
- Unmanned Aerial System

Insertion and Extraction Training Activities

During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include unmanned underwater vehicles (UUV) and remotely operated vehicles (ROVs), or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion / extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training.

Over-the-Beach Training Activities

During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective. Rubber replicate weapons could be carried by trainees to imitate real-world events.

Special Reconnaissance Training Activities

Upon arrival at a designated area, trainees would hike to a designated observation point. Trainees are taught the techniques for conducting reconnaissance without alerting anyone to their presence or location. Trainees would remain undetected for a period of time with the goal of leaving no trace of their presence behind. This includes no vegetation trampled, no branches broken, no footprints visible, or any other indicators that they were there. Trainees would use observation techniques, following procedures, and reporting back on a scenario involving role-play with military instructors or support staff. No reconnaissance would be intentionally performed on activities other than those staged and pre-arranged for training purposes.

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Drop Zone Training Activities

Naval special operations personnel would utilize existing and new land-based and water-based drop zones to conduct air-based training activities. Land-based drop zone training activities are conducted at sites where up to 40 trainees land after parachuting from a fixed-wing aircraft at an altitude between 12,500 and 500 feet above ground level (AGL). Land-based drop zones may also be utilized for training activities where helicopters or MV-22 aircraft approach the ground surface (approximately 5–15 feet AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 feet AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area, trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- include up to 6 hours of aircraft operation per training event
- utilize AC-130, C-17, MV-22, or similar aircraft to support training with parachutes
- utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation
- hover for approximately 15 minutes when facilitating drop zone training activities via helicopter or MV-22
- coordinate use of airspace with FAA Honolulu Control Facility as far in advance as possible

Unmanned Aircraft Systems Training Activities

The UAS consists of a hand-launched or catapult system, a control system, and a remotely piloted or self-piloted (i.e., preprogrammed flight pattern) air vehicle that may be fixed-wing or rotary-wing. They would carry only non-hazardous payloads such as cameras, sensors, and communications equipment. Propulsion is through electrical motor-driven propellers powered by rechargeable batteries. UASs would be deployed and fly within an authorized training area over federal property (such as restricted airspace and warning areas), as prescribed by the DoD and FAA. For training outside restricted airspace or warning areas, the UAS would be flown over federal property in accordance with a valid FAA Certificate of Authorization. UAS training may be a standalone activity or used in conjunction with all training activities, with the exception of in drop zones. UAS utilized for proposed training would:

- be categorized as FAA Group 1 or Group 2 systems, weighing up to 55 pounds
- vary in size up to approximately 2 meters in length, with a wingspan of 3 meters

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- normally operate below 3,500 feet AGL
- utilize on the ground observers (no manned aircraft observers)
- fly in accordance with FAA authorizations

See Attachment 1 for a full, detailed Project Description.

NEGATIVE DETERMINATION

After thorough assessment, the Navy has determined that the proposed action, as described above, would not conflict with CZMA policies. Training activities subject to this Negative Determination would occur on federal property; therefore, these areas are not within the coastal zone. Additionally, the proposed action would be compatible with the objectives, policies and guidance of other state and local land use plans. It is important to note that no land is being acquired, rezoned or changed for the proposed action and the proposed activities are consistent to the maximum extent practicable with the enforceable policies of Hawaii's CZMA program. Section 304 of the Act states that the term coastal zone does not include lands the use of which is by law subject solely to the discretion of or which is held in trust by the Federal government. This exempts all lands federally owned, leased, or held in trust. That stated, the Navy recognizes that actions outside the coastal zone may affect land or water uses or natural resources along the coast and therefore are subject to the provisions of the Act. Consequently, an analysis of the impacts of the proposed action on the coastal zone was conducted for the following areas:

1. Land Use Compatibility - The proposed training activities are proposed for Federal land where public access is already restricted. The proposed activity would not further restrict access. Right of entry permits and real estate agreements would be obtained prior to conducting training in areas where consent is needed.
2. Traffic - The Proposed Action would not change or alter transportation facilities or circulation of traffic patterns within the training study area or surrounding area.
3. Noise - Training activities would generally occur away from residentially zoned areas and the operational conditions of land-based activities is to remain undetected and leave no trace of presence during or after the training. In addition, the operational conditions of aviation activities to maintain elevations above 2,000 feet except for short periods (below 500 feet for approximately 10 minutes) associated with proposed training avoids and minimizes noise and potential noise impacts. Disturbances are expected to be short term and infrequent and any impacts on points of interest are minimal and short term based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities.
4. Topography and Soils - The Proposed Action does not include construction on undeveloped lands or ground-disturbing activities in any undisturbed areas.

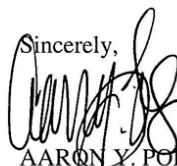
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5. Air Quality - Transportation vehicles, vessels, aircraft and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on the ambient air quality of the region. In addition, the dispersive nature of the proposed activities would prevent pollutants concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed NAAQS. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination.
6. Biological Resources - The Navy determined the proposed action may affect but would not adversely affect biological resources and thus initiated Section 7 Consultation under the Endangered Species Act with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) seeking concurrence.
7. Cultural Resources - The Navy does not anticipate any adverse effects to historic properties in accordance with the Section 106 Implementing Regulations. Section 106 consultation was initiated with SHPD in August 2018 to assess the effects of the proposed action on historic properties.
8. Water Resources - The Proposed Action would not impound, divert, drain, control, or otherwise modify the waters of any stream or other body of water. The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action.
9. Infrastructure - The Proposed Action does not include changes to infrastructure within the training study area. There would be no disruption or change to existing wastewater, water, or telecommunication services associated with the Proposed Action.
10. Visual Resources - The Proposed Action does not include construction or permanent new structures over an undisturbed area and would not alter the visual landscape within the training study area. In addition, any vegetation clearing (only proposed at one location) would not change the overall composition of the landscape.
11. Hazardous Materials and Wastes - The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of best management practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended material such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations.

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training. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly.

Based on the information summarized above, the Navy has determined that the implementation of the naval special operations training on Federal property would have no effect on coastal uses or resources of Hawaii. My POC for this matter is Mr. James Furuhashi, at james.furuhashi@navy.mil, or (808) 472-9702.

Sincerely,


AARON Y. POENTIS
Director
Regional Environmental Department
By direction of the
Commander

Enclosure: Attachment 1

ATTACHMENT 1
NAVAL SPECIAL OPERATIONS TRAINING STATE OF HAWAII
PROJECT DESCRIPTION

The United States (U.S.) Naval Special Warfare Command (NSWC) proposes to conduct small-unit intermediate and advanced land and maritime training activities for naval special operations personnel. U.S. NSWC is the U.S. Department of the Navy's (Navy's) special operations force and the maritime component of the U.S. Special Operations Command (USSOCOM). The proposed training activities consist of training by naval special operations personnel with occasional integration of other USSOCOM components, including U.S. Army Special Operations Command, Marine Corps Special Operations Command, Air Force Special Operations Command, and Joint Special Operations Command. The occasional integration of other USSOCOM components would occur only with NSWC-led training.

The proposed training activities broadly fit into three categories: water-based training, land-based training, and air-based training. Water-based training generally includes naval special operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination. Water based training may also incorporate inserting and extracting naval special operations personnel or equipment using watercraft as part of a training event and prior to performing a land-based training component. Land-based training would include personnel transiting over the beach on foot, simulating building clearance activities using simulated munitions, in limited areas engaging in high angle climbing, and using observation techniques in a pre-arranged scenario (special reconnaissance operations with military role players). Air-based training would include the use of unmanned aircraft systems (UAS) or aircraft utilizing drop zones or landing zones for parachute or rope suspension training activities. The proposed training would take place in selected coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii.

The purpose of the Proposed Action is to ensure that special operation forces acquire and master the individual and team skills in the marine, terrestrial, and aviation aspects of naval special operations in order to progress to more advanced training and to be combat-ready when called to conduct special operations in support of Combatant Commanders. Naval special operations personnel must be ready for a variety of military operations—from large-scale conflict to maritime security and humanitarian assistance/disaster relief—to respond to the dynamic, social, political, economic, and environmental issues that may arise. The need of the Proposed Action is to meet requirements under 10 U.S. Code Section 167 for the Commander, USSOCOM to provide combat-ready forces.

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the main Hawaiian Islands. Training would occur in the nearshore waters and land-based areas on Oahu, Island of Hawaii, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai. The training study area includes five regions on Oahu (Figure 1): (1) Joint Base Pearl Harbor-Hickam (JBPHH) (Figure 2), (2) South (Figure 3), (3) Windward (Figure 4), (4) North (Figure 5), and (5) West Oahu (Figure 6).

The training study area also includes sites on or near the Island of Hawaii (Figure 7), Kauai (Figure 8), Maui (Figure 9), Lanai (Figure 10), and Molokai (Figure 11). Training activities would occur on federal and non-federal property pending appropriate approvals.

Activities on Federal land and that are included on the "*Navy/Marine Corps De Minimis Activities Under CZMA*" have already been submitted and concurred with by the Hawaii Coastal Zone Management

(CZM) Program. Per the July 9, 2009 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed activities are subject to and bound by full compliance with the "Project Mitigation/General Conditions."

Federal lands that are not included in the "Navy/Marine Corps De Minimis Activities Under CZMA" are being evaluated under this "Negative Determination."

Non-federal lands in the training study area are being evaluated under a Federal Consistency Determination.

Table 1 identifies the NSO HI training study areas, associated landownership, and CZMA coverage.

Table 1- NSO HI Property List and CZMA Coverage

	Land Ownership	De Minimis List	Negative Determination	Federal Consistency Determination
OAHU				
JBPBH Region				
Pearl City Peninsula Annex	Federal	X		
Inactive Ship Yard	Federal	X		
Waipi'o Peninsula	Federal	X		
Ford Island	Federal	X		
Mobile Diving Salvage Unit	Federal	X		
Honeymoon Beach	Federal	X		
Puuloa Demolition Range	Federal	X		
Puuloa Rifle Range	Federal	X		
Iroquois Point Harbor	Private			X
Fort Kamehameha	Federal	X		
West Region				
Keawaula Beach	State			X
Kaena Point Satellite Tracking Station	Federal	X*		

Makaha Beach	State			X
Ulehawa Beach	State			X
Lualualei Ranges	Federal	X		
Ko'olina Marina	Private			X
Barbers Point Harbor	State			X
South Region				
U.S. Coast Guard Station Barbers Point	Federal and State		X	
White Plains Beach	State			X
Ke'ehi Boat Harbor	Private and State			X
Sand Island Beach	State			X
Kewalo Basin	Private and State			X
Ala Moana Beach	State			X
Maunaloa Boat Ramp	State			X
Windward Region				
Makapuu Beach	State			X
Waimanalo Beach	State			X
Kailua Beach	State			X
Marine Corps Base Hawaii	Federal	X		
He'eia Ramp	State			X
Kahana Bay	State			X
North Region				
Kanes Drop Zone	Federal		X	
Waimea Beach	State			X
Halewia Boat Ramp	State			X
Makaleha Stream	State			X

Dillingham	State			
BIG ISLAND				
Mahukona State Beach	State			X
Kawaihae Harbor	Private and State			X
Maliu Park	State			X
KAUAI				
Pacific Missile Range Facility Barking Sands/Mana Point	Federal	X		
Polihaie State Park	State			X
MAUI				
Maalaea	Private and State			X
MOLOKAI				
Haleolono Harbor	State			X
Kaunakakai	State			X
LANAI				
Kaumalapau Harbor	Private and State			X
Manele/Hulopoe Beach	Private and State			X

Note: Kaena Point Satellite Tracking Station (KPSTS) has a separate de minimis agreement with the CZM Program titled "Hawaii CZM Program Federal Consistency Concurrence for United States Air Force Kaena Point Satellite Tracking Station De Minimis Activities Under CZMA. Per the October 28, 2010 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed de minimis activities are subject to and bound by full compliance with corresponding conditions and mitigation measures.

Naval special operations personnel consider several factors in addition to training qualifications and training requirements when selecting a site for training. The selection of a site is dependent on receiving real estate agreements/rights of entry, seasonal conditions (high surf, dangerous currents, or high winds), and site conditions (period of high public presence or protected natural resources considerations). Virtually all of the skills that the proposed training is designed to hone may be accomplished throughout all the geographic regions; however, consideration of the factors discussed

above narrow the potential sites available for training at different times of the year. Some sites and facilities support specific individual training objectives and requirements. These training activities include:

- Over-the-beach carrying a live-fire weapon, moving to a designated live-fire range
 - Proposed locations (all Federal property): JBPHH Region - Puuloa Range Training Facility, Pearl City Peninsula; Windward Oahu Region - Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility.
- High-angle climbing
 - Proposed location: North Oahu Region.
- Drop zone requiring vegetation clearing
 - Proposed location: JBPHH Region - Waipio Peninsula.
- Simulated building clearance and UAS
 - Federal property within the training study area.
- Land-based drop zones and landing zones
 - Proposed locations (all Federal property): JBPHH Region - Waipio Peninsula, Pearl City Peninsula, Ford Island; North Oahu Region - Kanes (drop zone only); and West Oahu Region - Lualualei Annex.
 - Landing zones on Pearl City Peninsula would be utilized 5–12 times per year. Training would start at 1330 and run up to 2200 hours.
- Water-based drop zones
 - Proposed locations: JBPHH Region - Pearl City Peninsula and Windward Oahu Region - Marine Corps Base Hawaii (within the 500-yard security buffer surrounding the installation).

The variety of sites allows for a training progression to occur based on the trainees' skill set demonstrated as they accomplish each training skill objective. Multiple sites on Oahu and on or near other Hawaiian Islands are needed to accommodate seasonal changes, evolving skill sets, and site-specific restrictions that may occur at certain times of the year. The diversity of sites within the training study area also facilitates minimal interaction with the public and minimization of impacts on the natural environment at each potential training site through planned infrequent and random use. Additionally, infrequent use of sites helps to mitigate negative training aspects associated with trainees becoming too familiar with what to expect when they repeatedly conduct the same training at the same sites.

Each non-federal training site would be used for a maximum of 10 events per year (pending receipt of real estate agreements/right-of-entry) within the training study area. The maximum number of events across all non-federal land training sites would not exceed 330 events.

For federal property, collectively up to 265 events would occur per year. Not every non-Federal site will be used every year. However, for any particular site within a region and alternative, the maximums as described above would not be exceeded. The total training events proposed on federal property would be distributed throughout the federal property within the training study area.



Figure 1: Oahu Island Training Study Area

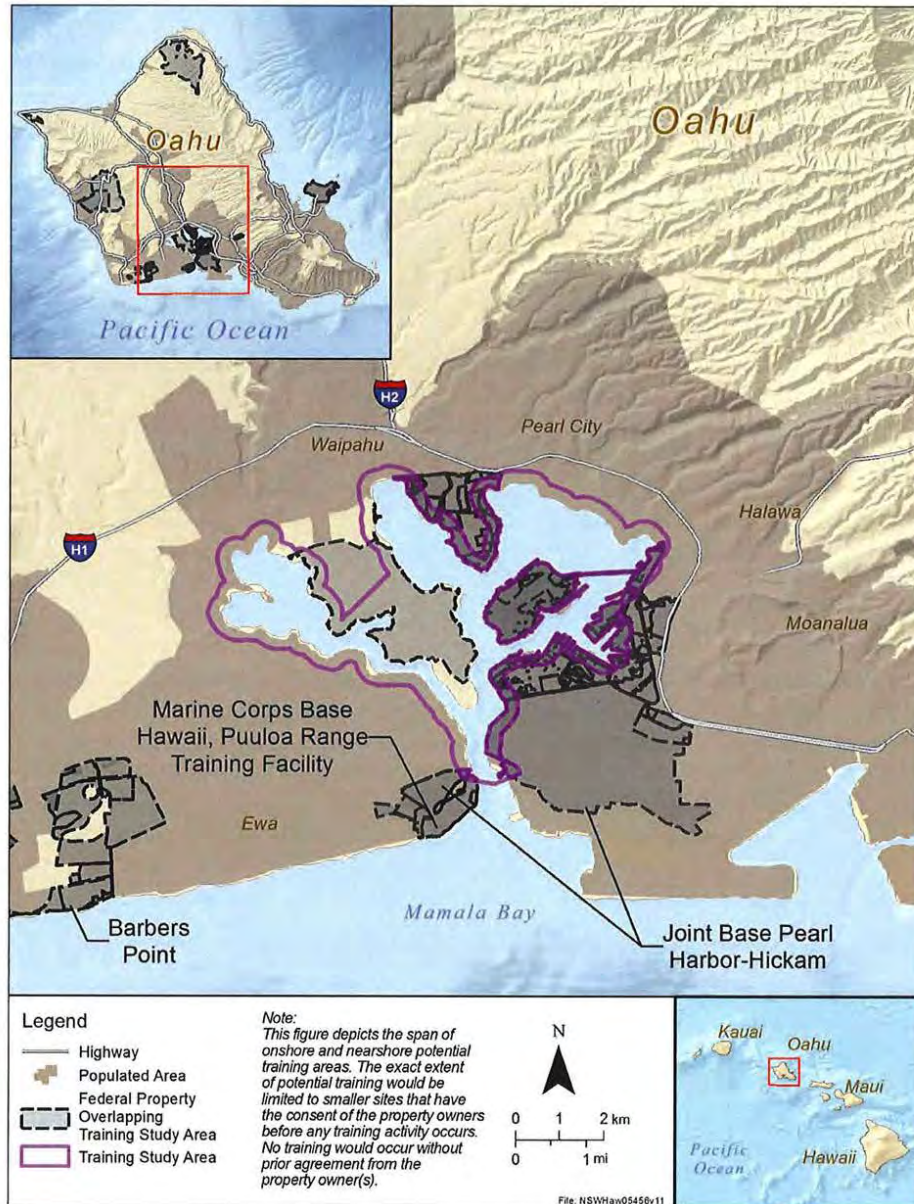


Figure 2: Oahu Joint Base Pearl Harbor-Hickam Training Study Area

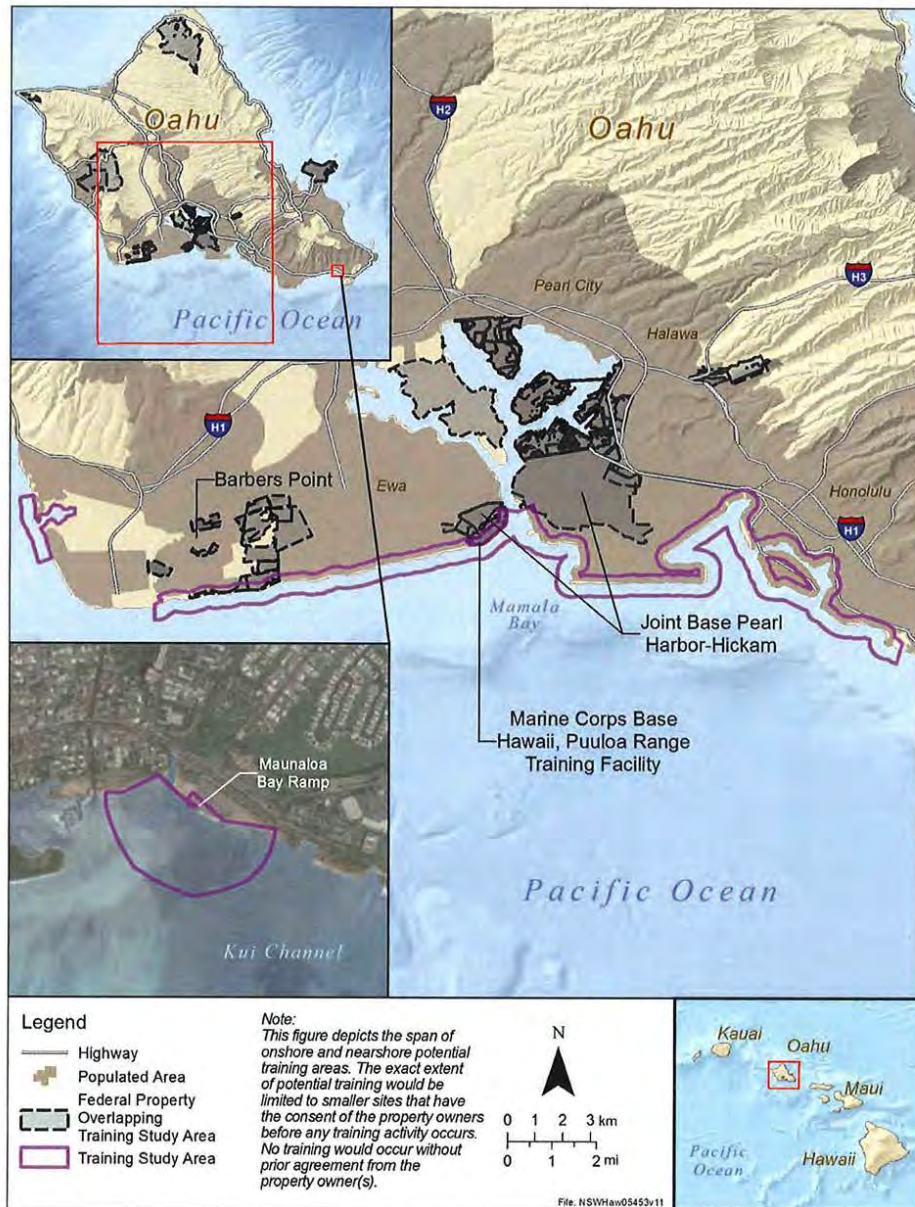


Figure 3: Oahu South Region Training Study Area



Figure 4: Oahu Windward Region Training Study Area

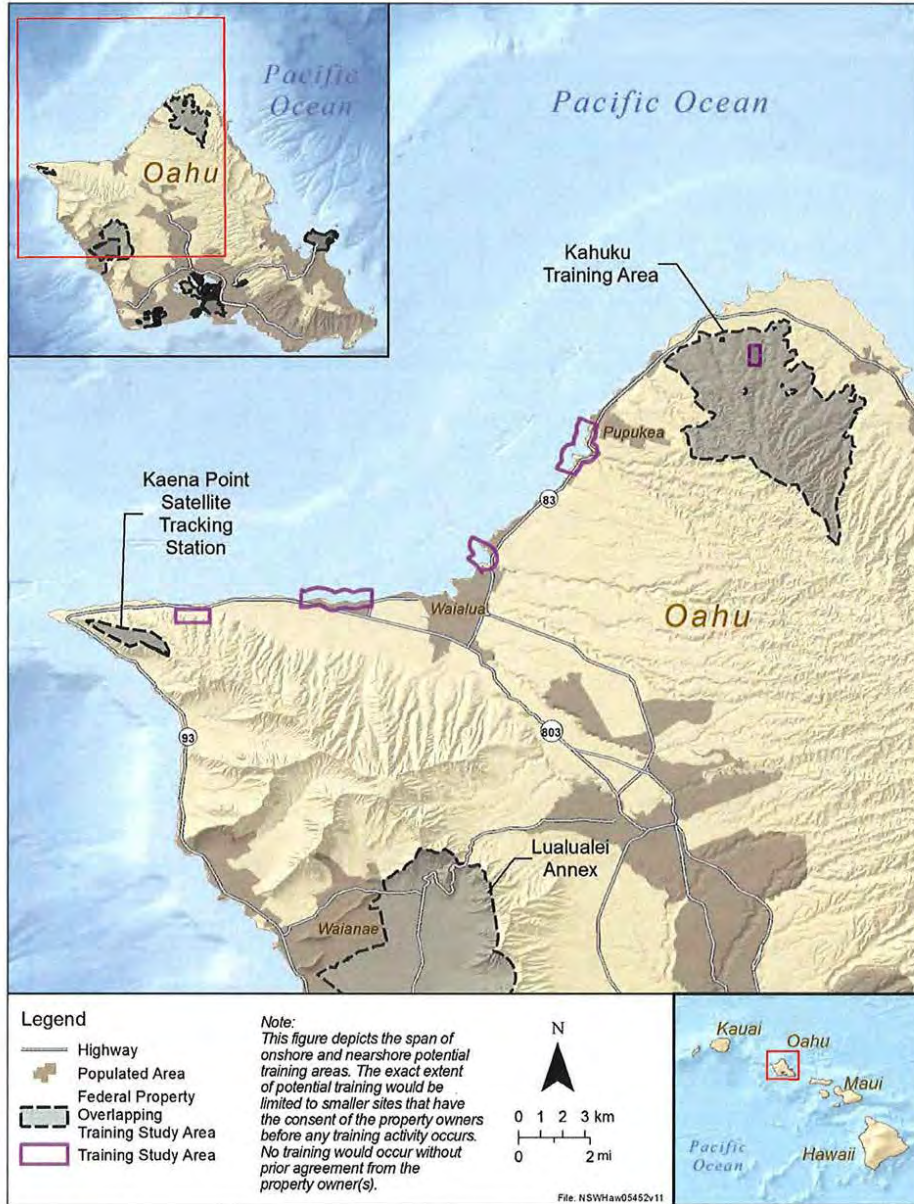


Figure 5: Oahu North Region Training Study Area

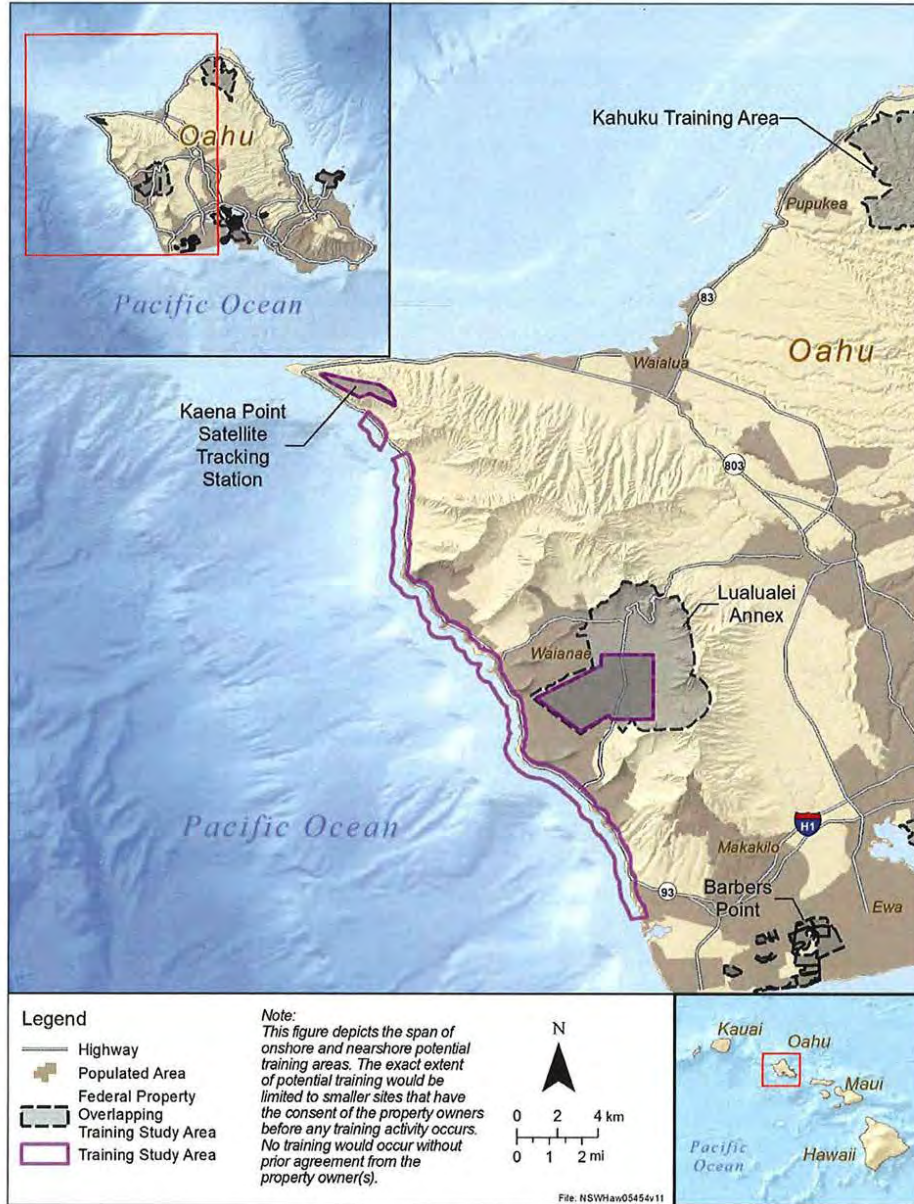


Figure 6: Oahu West Region Training Study Area

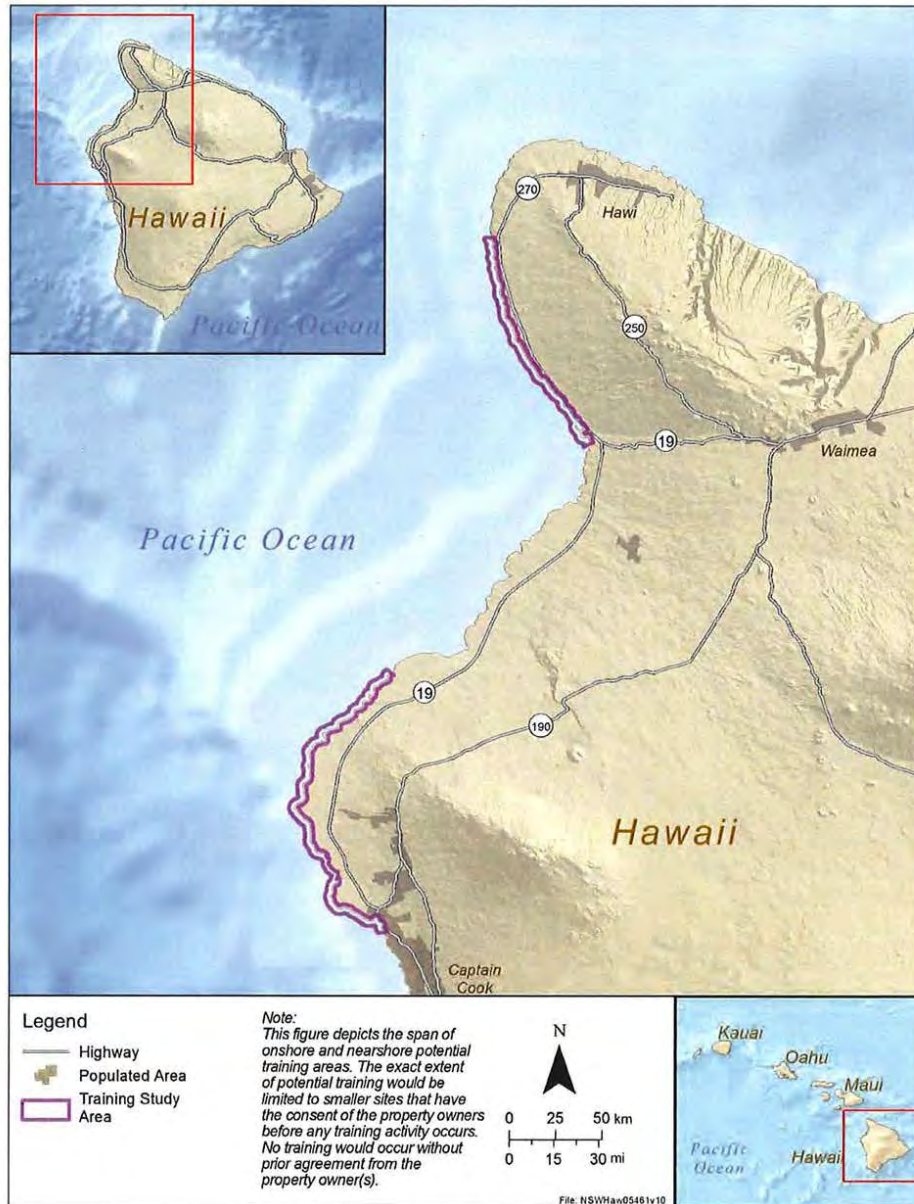


Figure 7: Island of Hawaii Training Study Area

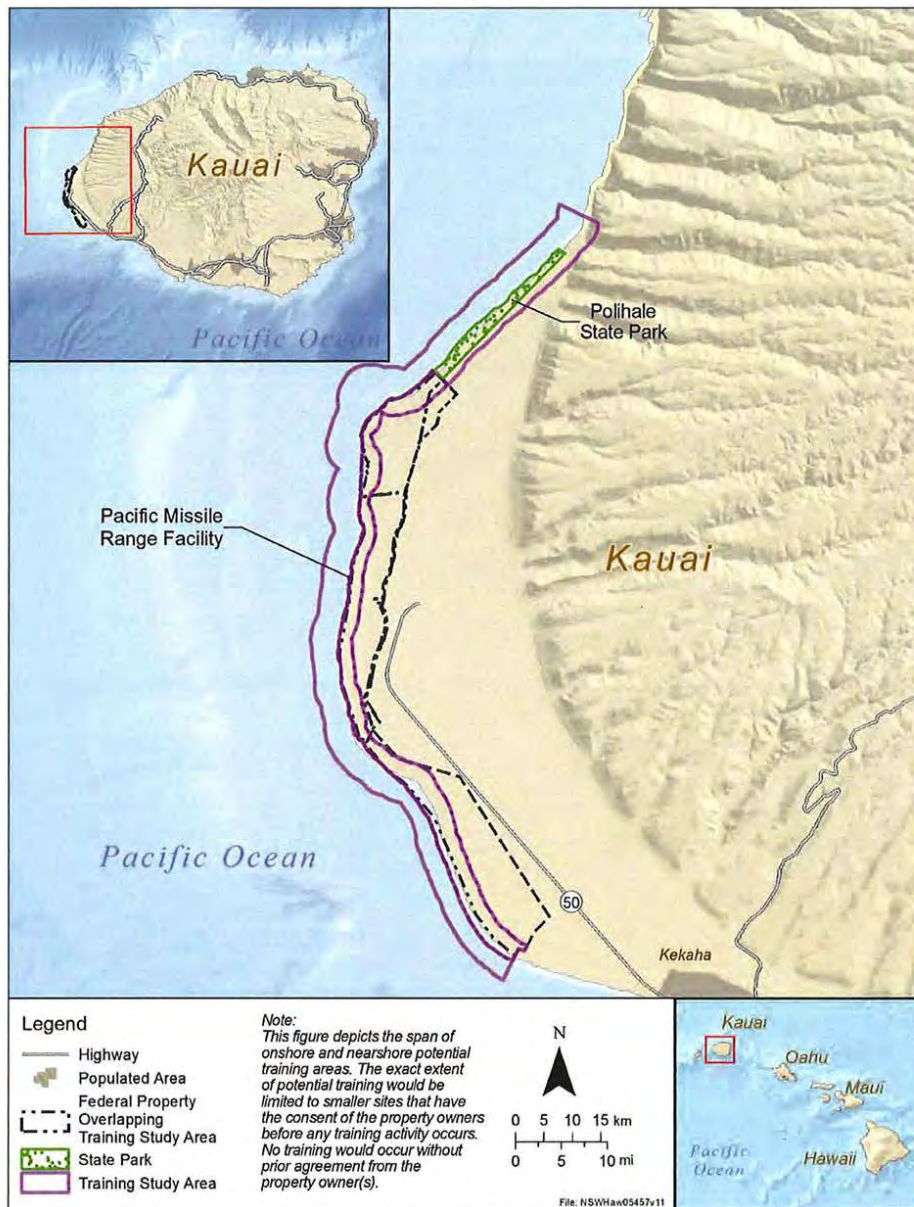


Figure 8: Kauai Training Study Area

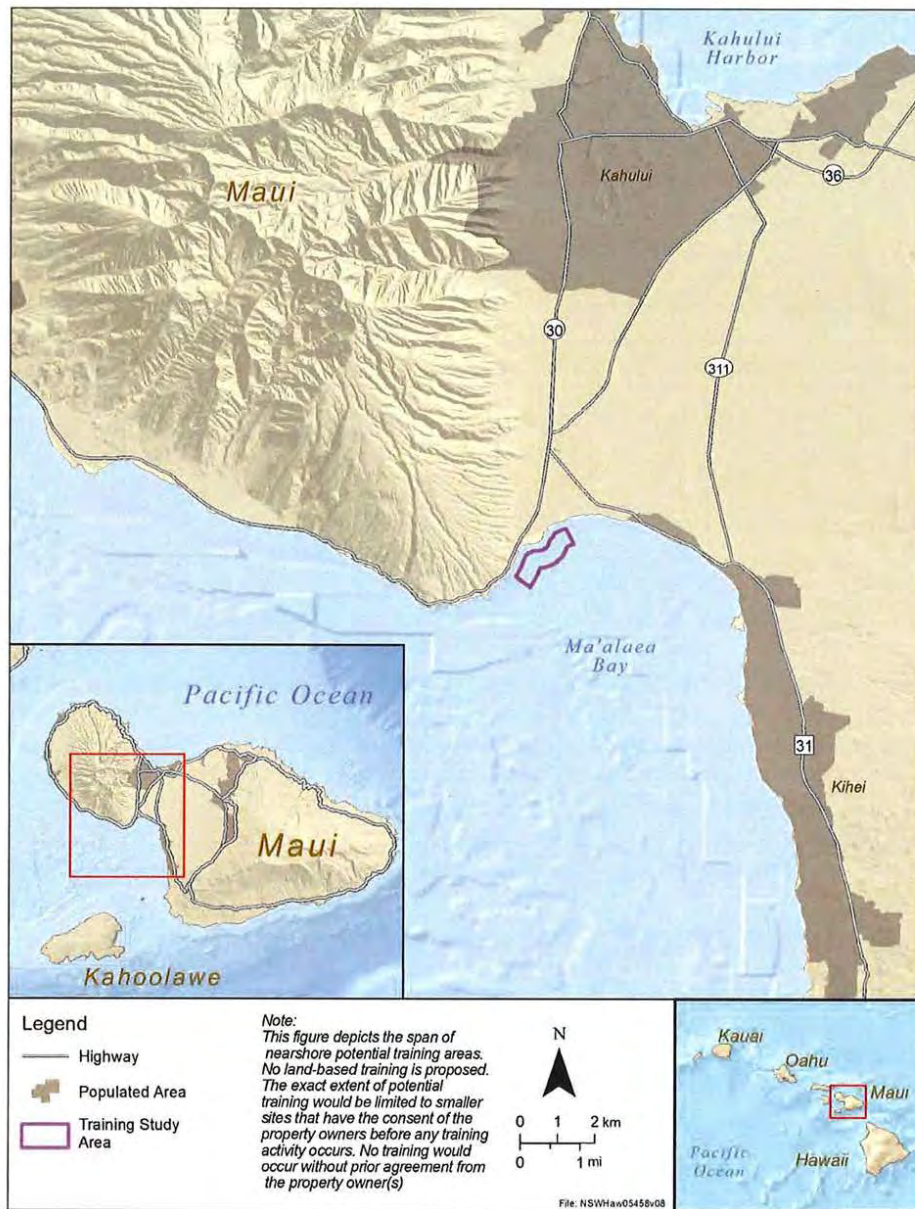


Figure 9: Maui Training Study Area



Figure 10: Lanai Training Study Area



Figure 11: Molokai Training Study Area

**DEPARTMENT OF THE NAVY**

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96960-5101

5090
Ser N45/0497
April 15, 2019

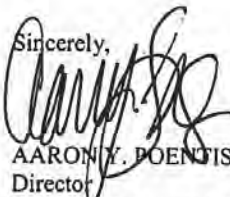
CERTIFIED NO: 7016 0910 0001 0891 7161

Office of Planning, State of Hawaii
Coastal Zone Management Program
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Sirs:

**SUBJECT: APPLICATION FOR COASTAL ZONE MANAGEMENT (CZM) FEDERAL
CONSISTENCY REVIEW FOR NAVAL SPECIAL OPERATIONS TRAINING,
STATE OF HAWAII**

In accordance with the Federal Coastal Zone Management Act of 1972 (CZMA) as amended, the United States (U.S.) Department of the Navy (Navy) is submitting the attached application for Federal consistency review. This review is only for non-Federal lands in the training study area. Federal lands that are in the study area have already been addressed in previous correspondence. My POC for this matter is James Furuhashi, at james.furuhashi@navy.mil, or 808-472-9702.

Sincerely,


AARON Y. POENTIS
Director
Regional Environmental Department
By direction of the
Commander

Attachment:

Application for Coastal Zone Management (CZM) Federal Consistency Review for Naval Special Operations Training, State of Hawaii

A.4.2 Application for Coastal Zone Management Federal Consistency Review for Naval Special Operations Training in Hawaii – Non-Federal Lands (15Apr19)

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5090
Ser N45/0497
April 15, 2019

CERTIFIED NO: 7016 0910 0001 0891 7161

Office of Planning, State of Hawaii
Coastal Zone Management Program
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Sirs:

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Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Y. Poentis".

AARON Y. POENTIS

Director
Regional Environmental Department
By direction of the
Commander

Attachment:

Application for Coastal Zone Management (CZM) Federal Consistency Review for Naval Special Operations Training, State of Hawaii

Hawaii Coastal Zone Management Program

Coastal Zone Management Federal Consistency Review Application

Naval Special Operations Training
State of Hawaii

March 2019

Prepared For:

Naval Special Warfare Command
2000 Trident Way, Bldg. 624
San Diego, CA 92155-5599

Prepared By:

Naval Facilities Engineering Command, Pacific
258 Makalapa Drive, Ste 100
Pearl Harbor, HI
96860-3134

Table of Contents

Application for CZM Federal Consistency Review

Federal Consistency Assessment Form

Attachment 1: Project Description and Site Location Maps

Attachment 3: Supplemental Information

- **Attachment 3A- Draft Environmental Assessment (CD only)**

Application for CZM Federal Consistency Review

(The following text is extremely faint and largely illegible due to low contrast and blurring. It appears to be a standard application form with multiple sections for project information, agency details, and a signature block.)

Project Name: _____

Agency: _____

Location: _____

Start Date: _____

End Date: _____

Applicant: _____

Signature: _____

Date: _____



APPLICATION FOR CZM FEDERAL CONSISTENCY REVIEW

Project/Activity Title or Description: Naval Special Operations Training State of Hawaii

Location: State of Hawaii

Island: Various **Tax Map Key:** Various

Applicant or Agency

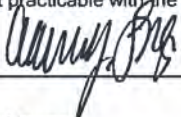
Department of the Navy- Navy Region Hawaii
 Name of Applicant or Agency
850 Ticonderoga St, Suite 110
 Mailing Address
JBPHH, HI 96860-5101
 City / State / Zip Code
471-3858
 Phone
aaron.poentis@navy.mil
 E-mail Address

Agent or Representative for Applicant

Julie Zimmerman/NAVFAC, Pacific
 Agent or Representative for Applicant
258 Makalapa Drive, Ste 100
 Mailing Address
Pearl Harbor, HI 96860-3134
 City / State / Zip Code
808-472-1403
 Phone
Julie.Zimmerman@navy.mil
 E-mail Address

CZM Consistency Determination or Certification

✓ Check the applicable type of federal action below and sign.

Federal Agency Activity
 CZM Consistency Determination: "The proposed activity will be undertaken in a manner consistent to the maximum extent practicable with the enforceable policies of the Hawaii Coastal Zone Management Program."
 Signature  Date 4/17/19

Federal Permit or License
 CZM Consistency Certification: "The proposed activity complies with the enforceable policies of Hawaii's approved management program and will be conducted in a manner consistent with such program."
 Signature _____ Date _____

Federal Grants and Assistance
 CZM Consistency Certification: "The proposed activity complies with the enforceable policies of Hawaii's approved management program and will be conducted in a manner consistent with such program."
 Signature _____ Date _____

Mail Application To: Office of Planning, State of Hawaii, P.O. Box 2359, Honolulu, Hawaii 96804



**HAWAII CZM PROGRAM
FEDERAL CONSISTENCY ASSESSMENT FORM**

RECREATIONAL RESOURCES

Objective: Provide coastal recreational opportunities accessible to the public.

Policies:

- 1) Improve coordination and funding of coastal recreational planning and management.
- 2) Provide adequate, accessible, and diverse recreational opportunities in the coastal zone management area by:
 - a) Protecting coastal resources uniquely suited for recreational activities that cannot be provided in other areas.
 - b) Requiring replacement of coastal resources having significant recreational value including, but not limited to surfing sites, fishponds, and sand beaches, when such resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the State for recreation when replacement is not feasible or desirable.
 - c) Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value.
 - d) Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation.
 - e) Ensuring public recreational uses of county, state, and federally owned or controlled shoreline lands and waters having recreational value consistent with public safety standards and conservation of natural resources.
 - f) Adopting water quality standards and regulating point and non-point sources of pollution to protect, and where feasible, restore the recreational value of coastal waters.
 - g) Developing new shoreline recreational opportunities, where appropriate, such as artificial lagoons, artificial beaches, and artificial reefs for surfing and fishing.
 - h) Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits by the land use commission, board of land and natural resources, and county authorities; and crediting such dedication against the requirements of Hawaii Revised Statutes, section 46-6.

RECREATIONAL RESOURCES (continued)

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

- | | <u>Yes</u> | <u>No</u> |
|--|-------------------------------------|-------------------------------------|
| 1. Will the proposed action occur in or adjacent to a dedicated public right-of-way, e.g., public beach access, hiking trail, shared-use path? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Will the proposed action affect public access to and along the shoreline? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Does the project site abut the shoreline? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Is the project site on or adjacent to a sandy beach? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 5. Is the project site in or adjacent to a state or county park? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 6. Is the project site in or adjacent to a water body such as a stream, river, pond, lake, or ocean? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Will the proposed action occur in or affect an ocean recreation area, swimming area, surf site, fishing area, or boating area? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion: (If more space is needed, attach a separate sheet.)

1. Yes, the proposed action would occur in or adjacent to dedicated public right-of-ways. The public would be allowed continued use of recreational areas consistent with existing access. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Trainees swimming in the water, moving across the beach, and walking on or off trails would be consistent with the manner in which the public conducts these same activities. Training would not restrict recreational activities within the training study area. Right of entry permits, or other real estate agreements, would be obtained prior to conducting training when required. Within the training study area, an individual non-federal site could be used for no more than ten events a year. The Proposed Action does not include the use of explosive demolitions, off-road driving, digging, tree climbing. See Section 3.2 of the Draft EA for additional information on Land Use and Recreation.

3./4. Yes, part of the training would abut the shoreline and is on or adjacent to a sandy beach. Training would occur in the nearshore waters and land-based areas on Oahu, Island of Hawaii, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai.

5./6. State and County parks are proposed for use on Oahu, Hawaii, and Kauai. Right of entry permits, or other real estate agreements, would be obtained prior to conducting training in areas where consent is needed. Minimization measures employed during training activities would limit encounters with the public during training events. Areas of the proposed training are also adjacent to water bodies (such as streams, rivers, ponds, and the ocean) throughout the training study area.

7. The proposed training will occur in ocean recreation areas, but will not negatively affect the areas. The State of Hawaii recreational goals of ensuring quality recreational facilities and expanding recreation facilities throughout the State of Hawaii would be maintained. Minimization measures employed during training activities would limit encounters with the public during training events. For example, if the public enters the training area, the safety support personnel assess the situation and, based upon safety considerations, will either continue the training, temporarily suspend the training, completely stop the training, or relocate the training to another approved training site.

HISTORIC RESOURCES

Objective: Protect, preserve, and, where desirable, restore those natural and manmade historic and prehistoric resources in the coastal zone management area that are significant in Hawaiian and American history and culture.

Policies:

- 1) Identify and analyze significant archaeological resources.
- 2) Maximize information retention through preservation of remains and artifacts or salvage operations.
- 3) Support state goals for protection, restoration, interpretation, and display of historic resources.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

	<u>Yes</u>	<u>No</u>
1. Is the project site within a designated historic or cultural district?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is the project site listed on or nominated to the Hawaii or National Register of Historic Places?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Has the project site been surveyed for historic or archaeological resources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Does the project parcel include undeveloped land which has not been surveyed by an archaeologist?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Is the project site within or adjacent to a Hawaiian fishpond or historic settlement area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Discussion: (If more space is needed, attach a separate sheet.)

1./2./3./4. The Navy reviewed existing information on historic properties within the APE from the SHPD, from the DoD cultural resources reports, and from the National Park Service's Focus digital library. This review resulted in the identification of 852 historic properties (listed and eligible) in the APE: 580 from Oahu, 182 from Hawaii Island, 80 from Kauai, 0 from Lanai, 4 from Maui, and 6 from Molokai. Although these historic properties are within the APE, the majority will not be utilized for training. These traditional and historic resources are located in the waters and on the shores of the Hawaiian Islands, many of which have not been evaluated for National Register eligibility. However, they will be treated as eligible for consultation purposes. The Navy also reviewed the inventory of properties listed in the NRHP through the National Park Service's Focus digital library and found 33 listed properties in the APE: 5 National Historic Landmarks (NHLs), 6 historic districts, 14 buildings and structures, 2 historic objections, and 6 archaeological sites.

5. The Huihua, Heeia, Kahalu'u, Kalou, Laulaunui, Loko'ea, Mōlī'i, Nu'upia, 'Okī'okīlepe, O'ohope, Pa'aiau, Pamoku, 'Uko'a, Waikalua Fishponds are within the Oahu Training Study Area. When applicable, the proposed training would follow the protocols established under (1) existing Programmatic Agreements, (2) Integrated Cultural Resources Management Plans and requirement. Section 106 consultation was initiated with SHPD in August 2018 to assess the effects of the proposed action on historic properties. The Navy does not anticipate any adverse effects to historic properties in accordance with the Section 106 Implementing Regulations. See Section 3.4 of the Draft EA for additional information on Cultural Resources.

SCENIC AND OPEN SPACE RESOURCES

Objective: Protect, preserve, and, where desirable, restore or improve the quality of coastal scenic and open space resources.

Policies:

- 1) Identify valued scenic resources in the coastal zone management area.
- 2) Ensure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of natural landforms and existing public views to and along the shoreline.
- 3) Preserve, maintain, and, where desirable, improve and restore shoreline open space and scenic resources.
- 4) Encourage those developments that are not coastal dependent to locate in inland areas.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

	Yes	No
1. Will the proposed action alter any natural landforms or existing public views to and along the shoreline?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Does the proposed action involve the construction of a multi-story structure?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Is the project site located on or adjacent to an undeveloped parcel, including a beach or oceanfront land?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Does the proposed action involve the construction of a structure visible between the nearest coastal roadway and the shoreline?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Will the proposed action involve constructing or placing a structure in waters seaward of the shoreline?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: (If more space is needed, attach a separate sheet.)

3. The proposed training would take place in selected coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. The proposed training activities broadly fit into three categories: water-based training, land-based training, and air based training. Water-based training generally includes naval special operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination. Land-based training would include personnel transiting over the beach on foot and simulating building clearance activities. Air-based training would utilize the airspace above federal property during training. Air-based training would be restricted to federal property on Oahu and Kauai within authorized airspace including restricted areas and warning areas. Training activities in the water, on the land, or in the air could occur as a single or separate event, or in many cases would be combined together to be performed sequentially to meet the training objectives. The Proposed Action does not include construction or permanent new structures over an undisturbed area and would not alter the visual landscape within the training study area.

COASTAL ECOSYSTEMS

Objective: Protect valuable coastal ecosystems, including reefs, from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

- 1) Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources.
- 2) Improve the technical basis for natural resource management.
- 3) Preserve valuable coastal ecosystems, including reefs, of significant biological or economic importance.
- 4) Minimize disruption or degradation of coastal water ecosystems by effective regulation of stream diversions, channelization, and similar land water uses, recognizing competing water needs.
- 5) Promote water quantity and quality planning and management practices that reflect the tolerance of fresh water and marine ecosystems and maintain and enhance water quality through the development and implementation of point and nonpoint source water pollution control measures.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

	<u>Yes</u>	<u>No</u>
1. Does the proposed action involve dredge or fill activities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Is the project site within the Special Management Area (SMA) or the Shoreline Setback Area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Is the project site within the State Conservation District?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
4. Will the proposed action involve some form of discharge or placement of material into a body of water or wetland?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Will the proposed action require earthwork, grading, clearing, or grubbing?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
6. Will the proposed action include the construction of waste treatment facilities, such as injection wells, discharge pipes, or septic systems?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Is an intermittent or perennial stream located on or adjacent to the project parcel?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
8. Does the project site provide habitat for endangered species of plants, birds, or mammals?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
9. Is any such habitat located in close proximity to the project site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

COASTAL ECOSYSTEMS (continued)

- | | <u>Yes</u> | <u>No</u> |
|---|-------------------------------------|-------------------------------------|
| 10. Is a wetland located on the project site or parcel? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 11. Is the project site situated in or abutting a Natural Area Reserve, a Marine Life Conservation District, or an estuary? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 12. Will the proposed action occur on or in close proximity to a reef or coral colonies? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion: (If more space is needed, attach a separate sheet.)

2. Portions of the training study area may overlap with portions of the Special Management Area; however, the proposed uses do not constitute "development" per Hawaii Administrative Rules Chapter 15-150. In addition, the real estate process will begin after the NEPA process is complete. Right of entry permits, or other real estate agreements, would be obtained prior to conducting training in areas where consent is needed.

3. Although portions of the training study area overlap with the Conservation District, the proposed uses are not regulated by the Office of Conservation and Coastal Lands as the activities will not permanently alter the landscape, or remain in one spot for more than 30-days. Right of entry permits, or other real estate agreements, would be obtained prior to conducting training in areas where consent is needed.

5. Vegetation clearing is proposed at one location - JBPHH Region - Waipio Peninsula (note- Waipio Peninsula is not included in this application and is included under the De Minimis List).

8./9. The project site provides habitat for endangered species; however, through consultation with USFWS, proposed training activities have been determined to may affect but would not adversely affect five ESA-listed plant species and associated critical habitat for two of the species, orangeblack damselfly, two yellow-faced bee species, Hawaiian coot, Hawaiian common gallinule, Hawaiian duck, Hawaiian stilt, Hawaiian goose, Hawaiian hawk, band-rumped storm petrel, Hawaiian petrel, Newell's Townsend's shearwater, Hawaiian hoary bat, oceanic whitetip shark, giant manta ray, green turtle, hawksbill turtle, olive ridley turtle, Hawaiian monk seal and associated critical habitat, blue whale (Central North Pacific Stock), Main Hawaiian Islands Insular false killer whale and associated critical habitat, fin whale, sei whale, and sperm whale. In accordance with section 7 of the ESA, the Navy is currently conducting informal consultation with the USFWS and NMFS regarding potential effects of the Proposed Action on ESA-listed species and designated critical habitat. Species would likely respond to the physical presence of trainees by temporarily stopping normal activities (e.g., feeding, resting) to move away from the activity. This type of impact is anticipated to be short term (where normal activities would resume after training events cease or move through the area) and minor (where behavioral changes would be insignificant). Potential effects to the species overall would be insignificant, as effects on individuals would be temporary and effects to habitat discountable because of the non-invasive nature and intent to leave no trace during or after a training event. Proposed training activities would have no significant impact on terrestrial wildlife and vegetation. See Section 3.3, Biological Resources, of the Draft EA for additional information.

12. The Proposed Action would occur on or in close proximity to a reef or coral colonies; however, the Proposed Action would have no adverse effect on Essential Fish Habitat within the training study area, and Level A and Level B harassment of marine mammals are not expected to occur. The Proposed Action is unlikely to result in take of a marine mammal under the MMPA. See Section 3.3, Biological Resources, of the Draft EA for additional information.

ECONOMIC USES

Objective: Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

- 1) Concentrate coastal development in appropriate areas.
- 2) Ensure that coastal dependent development such as harbors and ports, and coastal related development such as visitor industry facilities and energy generating facilities, are located, designed, and constructed to minimize adverse social, visual, and environmental impacts in the coastal zone management area.
- 3) Direct the location and expansion of coastal dependent developments to areas presently designated and used for such development and permit reasonable long-term growth at such areas, and permit coastal dependent development outside of presently designated areas when:
 - a) Use of presently designated locations is not feasible;
 - b) Adverse environmental effects are minimized; and
 - c) The development is important to the State's economy.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

	<u>Yes</u>	<u>No</u>
1. Does the proposed action involve a harbor or port?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is the proposed action a visitor industry facility or a visitor industry related activity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Does the project site include agricultural lands or lands designated for such use?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Does the proposed action relate to commercial fishing or seafood production?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Is the proposed action related to energy production or transmission?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is the proposed action related to seabed mining?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: (If more space is needed, attach a separate sheet.)

1. All training events on land areas and within state-owned harbors would be conducted in accordance with right of entry permits or other real estate agreements. A safety buffer would be established around maritime and land based training areas, and NSWC would have a vehicle dedicated for emergency response during training events. Size and type of safety buffer would vary by training site. The Proposed Action would not result in changes to the population demographics, employment, community, or socioeconomic characteristics within the training study area. See Section 3.6 of the Draft EA for additional information.

COASTAL HAZARDS

Objective: Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion, subsidence, and pollution.

Policies:

- 1) Develop and communicate adequate information about storm wave, tsunami, flood, erosion, subsidence, and point and nonpoint source pollution hazards.
- 2) Control development in areas subject to storm wave, tsunami, flood, erosion, hurricane, wind, subsidence, and point and nonpoint source pollution hazards.
- 3) Ensure that developments comply with requirements of the Federal Flood Insurance Program.
- 4) Prevent coastal flooding from inland projects.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

	Yes	No
1. Is the project site on or abutting a sandy beach?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. If "Yes" to question no. 1, has the project parcel or adjoining shoreline areas experienced erosion?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Is the project site within a potential tsunami inundation area? Refer to tsunami evacuation maps at http://www.scd.hawaii.gov	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Is the project site within a flood hazard area according to a FEMA Flood Insurance Rate Map (https://msc.fema.gov)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Is the project site within a subsidence hazard area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: (If more space is needed, attach a separate sheet.)

1. Yes, part of the training is on or abutting a sandy beach. Training would occur in the nearshore waters and land-based areas on Oahu, Island of Hawaii, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai.

4. Portions of the Training Study Areas on Oahu, the Big Island, and Kauai are within a flood hazard area.

MANAGING DEVELOPMENT

Objective: Improve the development review process, communication, and public participation in the management of coastal resources and hazards.

Policies:

- 1) Use, implement, and enforce existing law effectively to the maximum extent possible in managing present and future coastal zone development.
- 2) Facilitate timely processing of applications for development permits and resolve overlapping or conflicting permit requirements.
- 3) Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life cycle and in terms understandable to the public to facilitate public participation in the planning and review process.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

- | | <u>Yes</u> | <u>No</u> |
|---|-------------------------------------|--------------------------|
| 1. List the permits or approvals required for the proposed action and provide the status of each in the Discussion section below. | | |
| 2. Does the proposed action conform with state and county land use designations for the site? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Has the public been notified of the proposed action? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 4. Has an environmental impact statement or environmental assessment been prepared for the proposed action? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Discussion: (If more space is needed, attach a separate sheet.)

1. The following permits and approvals are required for the proposed action: U.S. Fish and Wildlife Service, Section 7 Consultation, Endangered Species Act (ESA); National Marine Fisheries Service (NMFS), Section 7 Consultation, Endangered Species Act; NMFS, EFH, Magnuson-Stevens Fishery Conservation and Management Act; Section 106 Consultation, National Historic Preservation Act; Office of Planning, Coastal Zone Management Act Consistency Determination; Right of Entry permits/Other Real Estate agreements.

2. Yes, the proposed action conforms with state and county land use designations for the site. In addition, right of entry permits, or other real estate agreements, would be obtained prior to conducting training when required.

3./4. The public has been informed of the proposed action. NSWC circulated the Draft EA for public review on November 8, 2018. A Notice of Availability of the Draft EA was published for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, The Environmental Notice, on November 8, 2018. Copies of the EA were placed in the five State public libraries. In addition, a digital copy of the Draft EA was made available for public review on the Naval Facilities Engineering Command, Pacific website at <https://go.usa.gov/xUnDC>. NSWC extended the public comment period to 07 Jan 2019. A Notice of Availability of the Final EA and Finding of No Significant Impact will be published in the same newspapers listed above, and copies of the documents will be available at the same libraries.

PUBLIC PARTICIPATION

Objective: Stimulate public awareness, education, and participation in coastal management.

Policies:

- 1) Promote public involvement in coastal zone management processes.
- 2) Disseminate information on coastal management issues by means of educational materials, published reports, staff contact, and public workshops for persons and organizations concerned with coastal issues, developments, and government activities.
- 3) Organize workshops, policy dialogues, and site-specific mediations to respond to coastal issues and conflicts.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

- | | <u>Yes</u> | <u>No</u> |
|---|-------------------------------------|-------------------------------------|
| 1. Has information about the proposed action been disseminated to the public? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Has the public been provided an opportunity to comment on the proposed action? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 3. Has or will a public hearing or public informational meeting be held? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion: (If more space is needed, attach a separate sheet.)

1.2. The public has been informed of the proposed action. NSWC circulated the Draft EA for public review on November 8, 2018. A Notice of Availability of the Draft EA was published for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, The Environmental Notice, on November 8, 2018. Copies of the EA were placed in the five State public libraries. In addition, a digital copy of the Draft EA was made available for public review on the Naval Facilities Engineering Command, Pacific website at <https://go.usa.gov/xUnDC>. NSWC extended the public comment period to 07 Jan 2019. A Notice of Availability of the Final EA and Finding of No Significant Impact will be published in the same newspapers listed above, and copies of the documents will be available at the same libraries. A public hearing will not be held.

BEACH PROTECTION

Objective: Protect beaches for public use and recreation.

Policies:

- 1) Locate new structures inland from the shoreline setback to conserve open space, minimize interference with natural shoreline processes, and minimize loss of improvements due to erosion.
- 2) Prohibit construction of private erosion-protection structures seaward of the shoreline, except when they result in improved aesthetic and engineering solutions to erosion at the sites and do not interfere with existing recreational and waterline activities.
- 3) Minimize the construction of public erosion-protection structures seaward of the shoreline.
- 4) Prohibit private property owners from creating a public nuisance by inducing or cultivating the private property owner's vegetation in a beach transit corridor.
- 5) Prohibit private property owners from creating a public nuisance by allowing the private property owner's unmaintained vegetation to interfere or encroach upon a beach transit corridor.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

	<u>Yes</u>	<u>No</u>
1. Will the proposed action occur on or adjacent to a beach?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is the proposed action located within the shoreline setback area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3. Will the proposed action affect natural shoreline processes?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Will the proposed action affect recreational activities?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Will the proposed action affect public access to and along the shoreline?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Discussion: (If more space is needed, attach a separate sheet.)

1./2. Yes, part of the training would on or adjacent to a beach. Training would occur in the nearshore waters and land-based areas on Oahu, Island of Hawaii, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai. Water-based training generally includes naval special operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination. Water based training may also incorporate inserting and extracting naval special operations personnel or equipment using watercraft as part of a training event and prior to performing a land-based training component. Land-based training would include personnel transiting over the beach on foot. During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective. Individuals would be allowed continued use of recreational areas on non-federal and federal lands consistent with existing access. Training would be localized, infrequent, brief in duration and consistent with the existing land use.

MARINE RESOURCES

Objective: Promote the protection, use, and development of marine and coastal resources to assure their sustainability.

Policies:

- 1) Ensure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial.
- 2) Coordinate the management of marine and coastal resources and activities to improve effectiveness and efficiency.
- 4) Assert and articulate the interests of the State as a partner with federal agencies in the sound management of ocean resources within the United States exclusive economic zone.
- 5) Promote research, study, and understanding of ocean processes, marine life, and other ocean resources to acquire and inventory information necessary to understand how ocean development activities relate to and impact upon ocean and coastal resources.
- 6) Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.

Check either Yes or No for each of the following questions, and provide an explanation or information for Yes responses in the Discussion section:

- | | <u>Yes</u> | <u>No</u> |
|--|-------------------------------------|-------------------------------------|
| 1. Will the proposed action involve the use or development of marine or coastal resources? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 2. Will the proposed action affect the use or development of marine or coastal resources? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Does the proposed action involve research of ocean processes or resources? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Discussion: (If more space is needed, attach a separate sheet.)

1. Yes, the Proposed Action will involve the use of marine or coastal resources. Water-based training generally includes naval special operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination. Water based training may also incorporate inserting and extracting naval special operations personnel or equipment using watercraft as part of a training event and prior to performing a land-based training component. See Section 3.3, Biological Resources, of the Draft EA for additional information.

Attachment 1: Project Description and Site Location Maps

**NAVAL SPECIAL OPERATIONS TRAINING STATE OF HAWAII
PROJECT DESCRIPTION**

The United States (U.S.) Naval Special Warfare Command (NSWC) proposes to conduct small-unit intermediate and advanced land and maritime training activities for naval special operations personnel. U.S. NSWC is the U.S. Department of the Navy's (Navy's) special operations force and the maritime component of the U.S. Special Operations Command (USSOCOM). The proposed training activities consist of training by naval special operations personnel with occasional integration of other USSOCOM components, including U.S. Army Special Operations Command, Marine Corps Special Operations Command, Air Force Special Operations Command, and Joint Special Operations Command. The occasional integration of other USSOCOM components would occur only with NSWC-led training.

The proposed training activities broadly fit into three categories: water-based training, land-based training, and air-based training. Water-based training generally includes naval special operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination. Water based training may also incorporate inserting and extracting naval special operations personnel or equipment using watercraft as part of a training event and prior to performing a land-based training component. Land-based training would include personnel transiting over the beach on foot, simulating building clearance activities using simulated munitions, in limited areas engaging in high angle climbing, and using observation techniques in a pre-arranged scenario (special reconnaissance operations with military role players). Air-based training would include the use of unmanned aircraft systems (UAS) or aircraft utilizing drop zones or landing zones for parachute or rope suspension training activities. The proposed training would take place in selected coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii.

The purpose of the Proposed Action is to ensure that special operation forces acquire and master the individual and team skills in the marine, terrestrial, and aviation aspects of naval special operations in order to progress to more advanced training and to be combat-ready when called to conduct special operations in support of Combatant Commanders. Naval special operations personnel must be ready for a variety of military operations—from large-scale conflict to maritime security and humanitarian assistance/disaster relief—to respond to the dynamic, social, political, economic, and environmental issues that may arise. The need of the Proposed Action is to meet requirements under 10 U.S. Code Section 167 for the Commander, USSOCOM to provide combat-ready forces. Part of the rigorous training is for the trainees to learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities.

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the main Hawaiian Islands. Training would occur in the nearshore waters and land-based areas on Oahu, Island of Hawaii, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai. The training study area includes five regions on Oahu (Figure 1): (1) Joint Base Pearl Harbor-Hickam (JBPHH) (Figure 2), (2) South (Figure 3), (3) Windward (Figure 4), (4) North (Figure 5), and (5) West Oahu (Figure 6).

The training study area also includes sites on or near the Island of Hawaii (Figure 7), Kauai (Figure 8), Maui (Figure 9), Lanai (Figure 10), and Molokai (Figure 11). Training activities would occur on federal and non-federal property pending appropriate approvals.

Activities on Federal land and that are included on the "Navy/Marine Corps De Minimis Activities Under CZMA" have already been submitted and concurred with by the Hawaii Coastal Zone Management (CZM) Program. Per the July 9, 2009 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed activities are subject to and bound by full compliance with the "Project Mitigation/General Conditions."

Federal lands that are not included in the "Navy/Marine Corps De Minimis Activities Under CZMA" are being evaluated under a "Negative Determination." These lands include U.S. Coast Guard Station Barbers Point and the Kanes Drop Zone at Kahuku Training Area.

Non-federal lands in the training study area are being evaluated under this Federal Consistency Determination.

Table 1 identifies the NSO HI training study areas, associated landownership, and CZMA coverage.

Table 1- NSO HI Property List and CZMA Coverage

	Land Ownership	De Minimis List	Negative Determination	Federal Consistency Determination
OAHU				
JBPHH Region				
Pearl City Peninsula Annex	Federal	X		
Inactive Ship Yard	Federal	X		
Waipi'o Peninsula	Federal	X		
Ford Island	Federal	X		
Mobile Diving Salvage Unit	Federal	X		
Honeymoon Beach	Federal	X		
Puuloa Demolition Range	Federal	X		
Puuloa Rifle Range	Federal	X		
Iroquois Point Harbor	Private			X
Fort Kamehameha	Federal	X		
West Region				
Keawaula Beach	State			X

Kaena Point Satellite Tracking Station	Federal	X*		
Makaha Beach	State			X
Ulehawa Beach	State			X
Lualualei Ranges	Federal	X		
Ko'olina Marina	Private			X
Barbers Point Harbor	State			X
South Region				
U.S. Coast Guard Station Barbers Point	Federal and State		X	
White Plains Beach	State			X
Ke'ehi Boat Harbor	Private and State			X
Sand Island Beach	State			X
Kewalo Basin	Private and State			X
Ala Moana Beach	State			X
Maunaloa Boat Ramp	State			X
Windward Region				
Makapuu Beach	State			X
Waimanalo Beach	State			X
Kailua Beach	State			X
Marine Corps Base Hawaii	Federal	X		
He'ela Ramp	State			X
Kahana Bay	State			X
North Region				
Kānes Drop Zone	Federal		X	
Waimea Beach	State			X

Halewia Boat Ramp	State			X
Makaleha Stream	State			X
Dillingham	State			
BIG ISLAND				
Mahukona State Beach	State			X
Kawaihae Harbor	Private and State			X
Maliu Park	State			X
KAUAI				
Pacific Missile Range Facility Barking Sands/Mana Point	Federal	X		
Polihale State Park	State			X
MAUI				
Maalaea	Private and State			X
MOLOKAI				
Haleolono Harbor	State			X
Kaunakakai	State			X
LANAI				
Kaumalapau Harbor	Private and State			X
Manele/Hulopoe Beach	Private and State			X

Note: Kaena Point Satellite Tracking Station (KPSTS) has a separate de minimis agreement with the CZM Program titled "Hawaii CZM Program Federal Consistency Concurrence for United States Air Force Kaena Point Satellite Tracking Station De Minimis Activities Under CZMA. Per the October 28, 2010 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed de minimis activities are subject to and bound by full compliance with corresponding conditions and mitigation measures.

Naval special operations personnel consider several factors in addition to training qualifications and training requirements when selecting a site for training. The selection of a site is dependent on receiving

rights of entry or other real estate agreements, seasonal conditions (high surf, dangerous currents, or high winds), and site conditions (period of high public presence or protected natural resources considerations). Virtually all of the skills that the proposed training is designed to hone may be accomplished throughout all the geographic regions; however, consideration of the factors discussed above narrow the potential sites available for training at different times of the year. Some sites and facilities support specific individual training objectives and requirements. These training activities include:

- Over-the-beach carrying a live-fire weapon, moving to a designated live-fire range
 - Proposed locations (all Federal property): JBPHH Region - Puuloa Range Training Facility, Pearl City Peninsula; Windward Oahu Region - Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility.
- High-angle climbing
 - Proposed location: North Oahu Region.
- Drop zone requiring vegetation clearing
 - Proposed location: JBPHH Region - Waipio Peninsula.
- Simulated building clearance and UAS
 - Federal property within the training study area.
- Land-based drop zones and landing zones
 - Proposed locations (all Federal property): JBPHH Region - Waipio Peninsula, Pearl City Peninsula, Ford Island; North Oahu Region - Kanes (drop zone only); and West Oahu Region - Lualualei Annex.
 - Landing zones on Pearl City Peninsula would be utilized 5–12 times per year. Training would start at 1330 and run up to 2200 hours.
- Water-based drop zones
 - Proposed locations: JBPHH Region – Pearl City Peninsula and Windward Oahu Region – Marine Corps Base Hawaii (within the 500-yard security buffer surrounding the installation).

The variety of sites allows for a training progression to occur based on the trainees' skill set demonstrated as they accomplish each training skill objective. Multiple sites on Oahu and on or near other Hawaiian Islands are needed to accommodate seasonal changes, evolving skill sets, and site-specific restrictions that may occur at certain times of the year. The diversity of sites within the training study area also facilitates minimal interaction with the public and minimization of impacts on the natural environment at each potential training site through planned infrequent and random use. Additionally, infrequent use of sites helps to mitigate negative training aspects associated with trainees becoming too familiar with what to expect when they repeatedly conduct the same training at the same sites.

Each non-federal training site would be used for up to 10 events per year (pending receipt of rights of entry or other real estate agreements) within the training study area. The maximum number of events across all non-federal land training sites would be up to 330 events.

For federal property, collectively up to 265 events would occur per year. Not every non-Federal site will be used every year. However, for any particular site within a region and alternative, the maximums as

described above would not be exceeded. The total training events proposed on federal property would be distributed throughout the federal property within the training study area.



Figure 1: Oahu Island Training Study Area

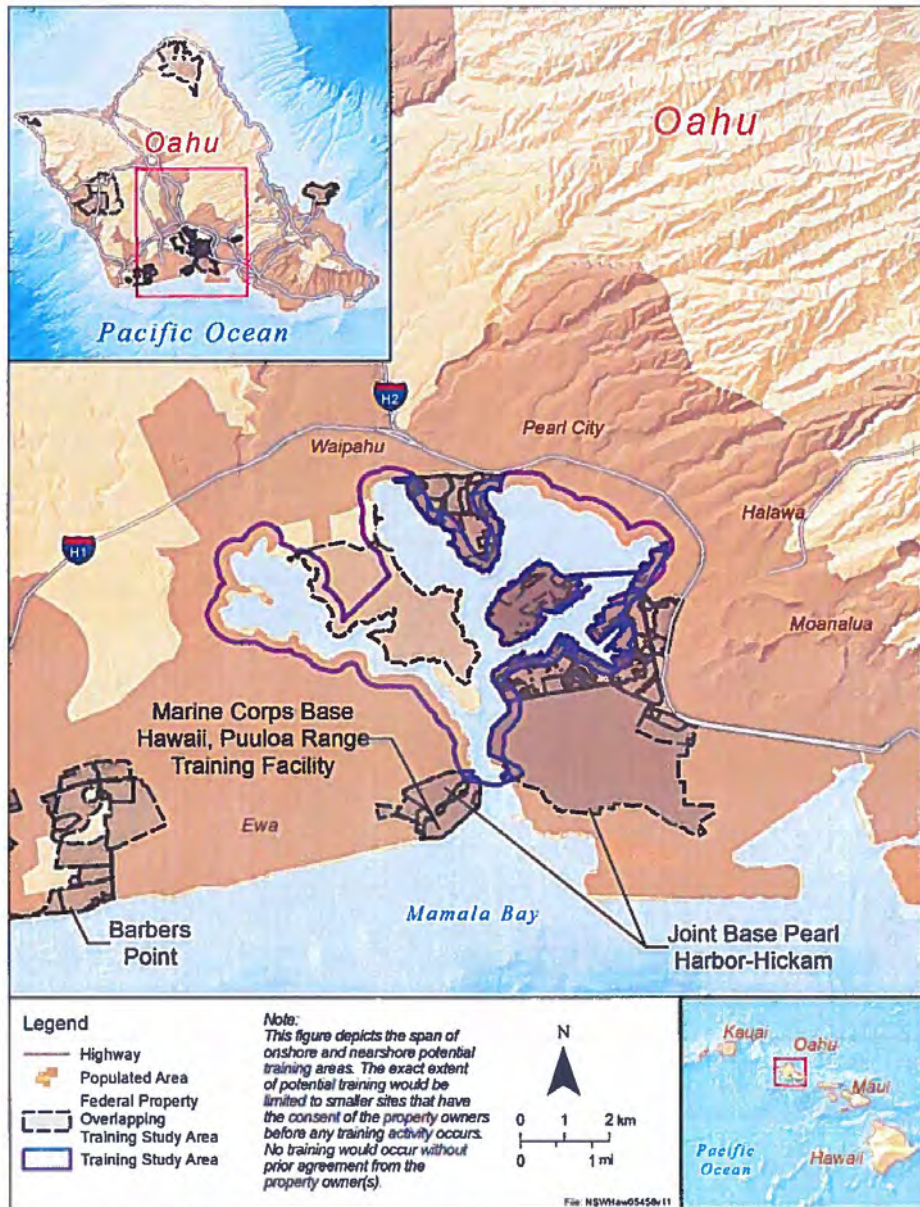


Figure 2: Oahu Joint Base Pearl Harbor-Hickam Training Study Area



Figure 3: Oahu South Region Training Study Area



Figure 4: Oahu Windward Region Training Study Area

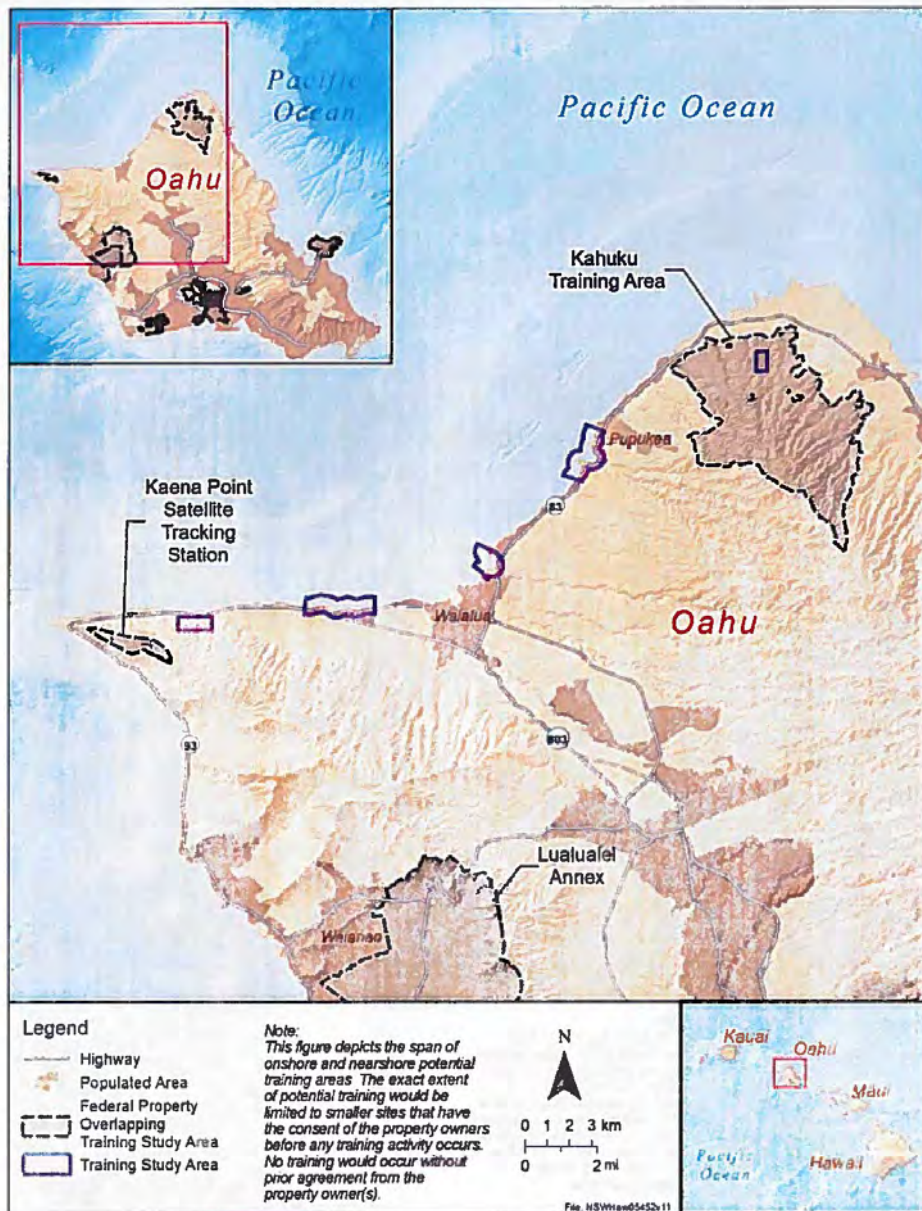


Figure 5: Oahu North Region Training Study Area



Figure 6: Oahu West Region Training Study Area

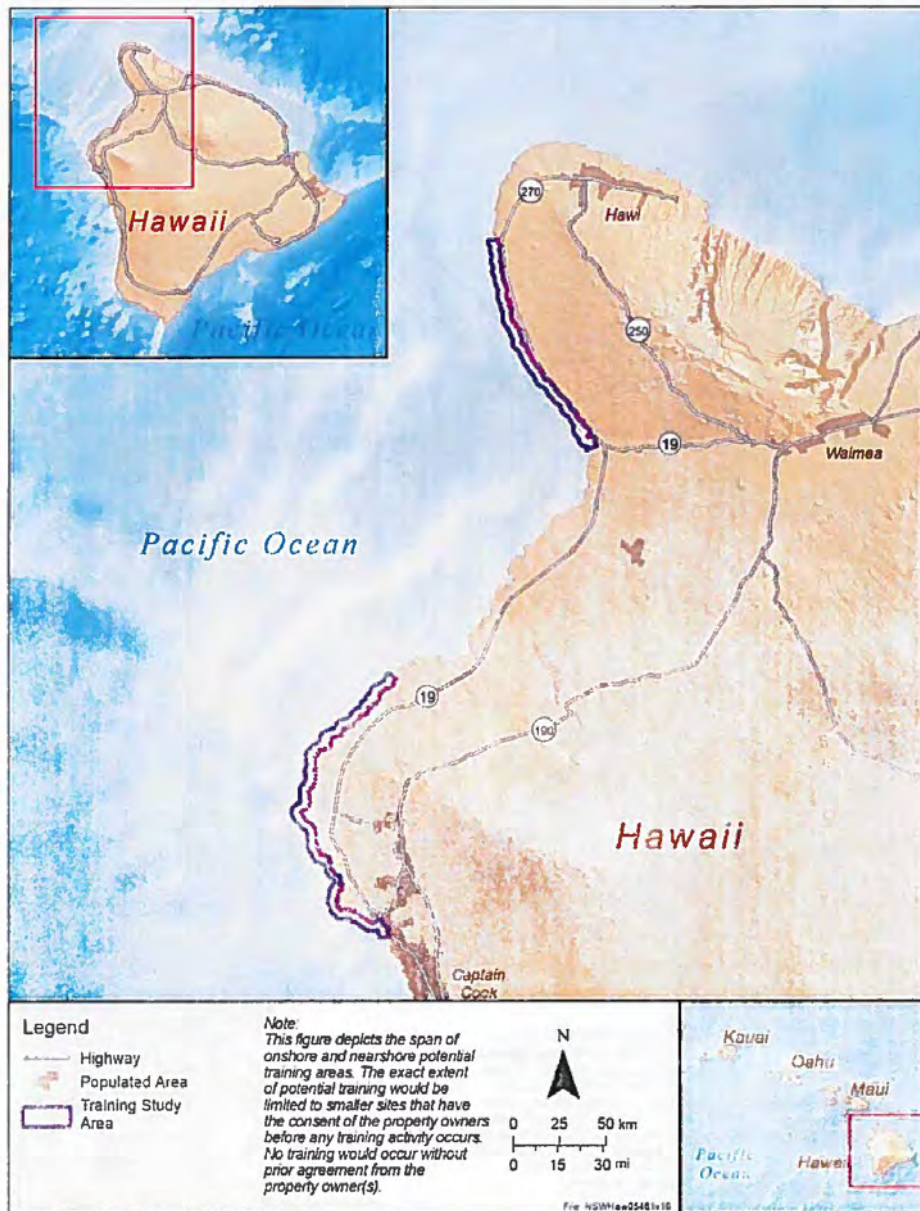


Figure 7: Island of Hawaii Training Study Area

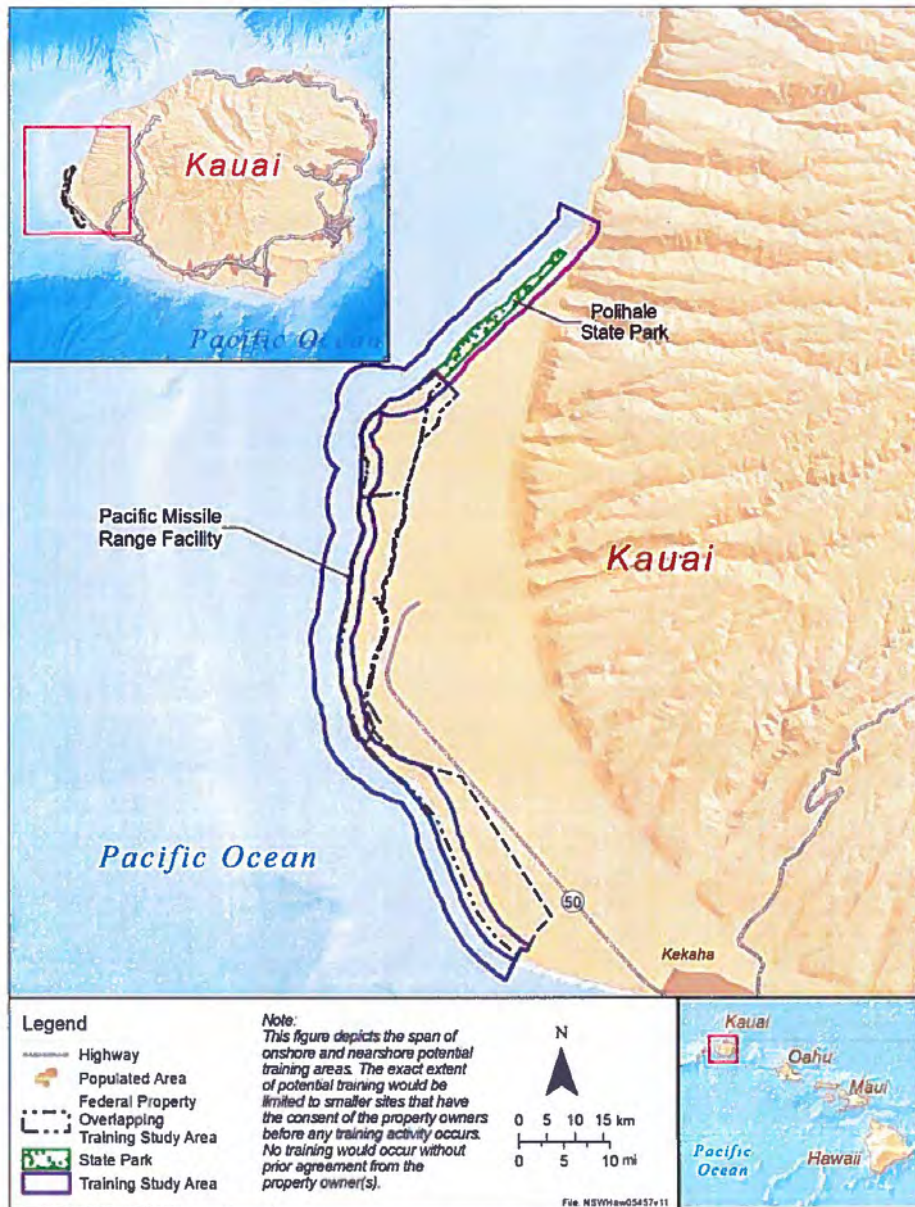


Figure 8: Kauai Training Study Area

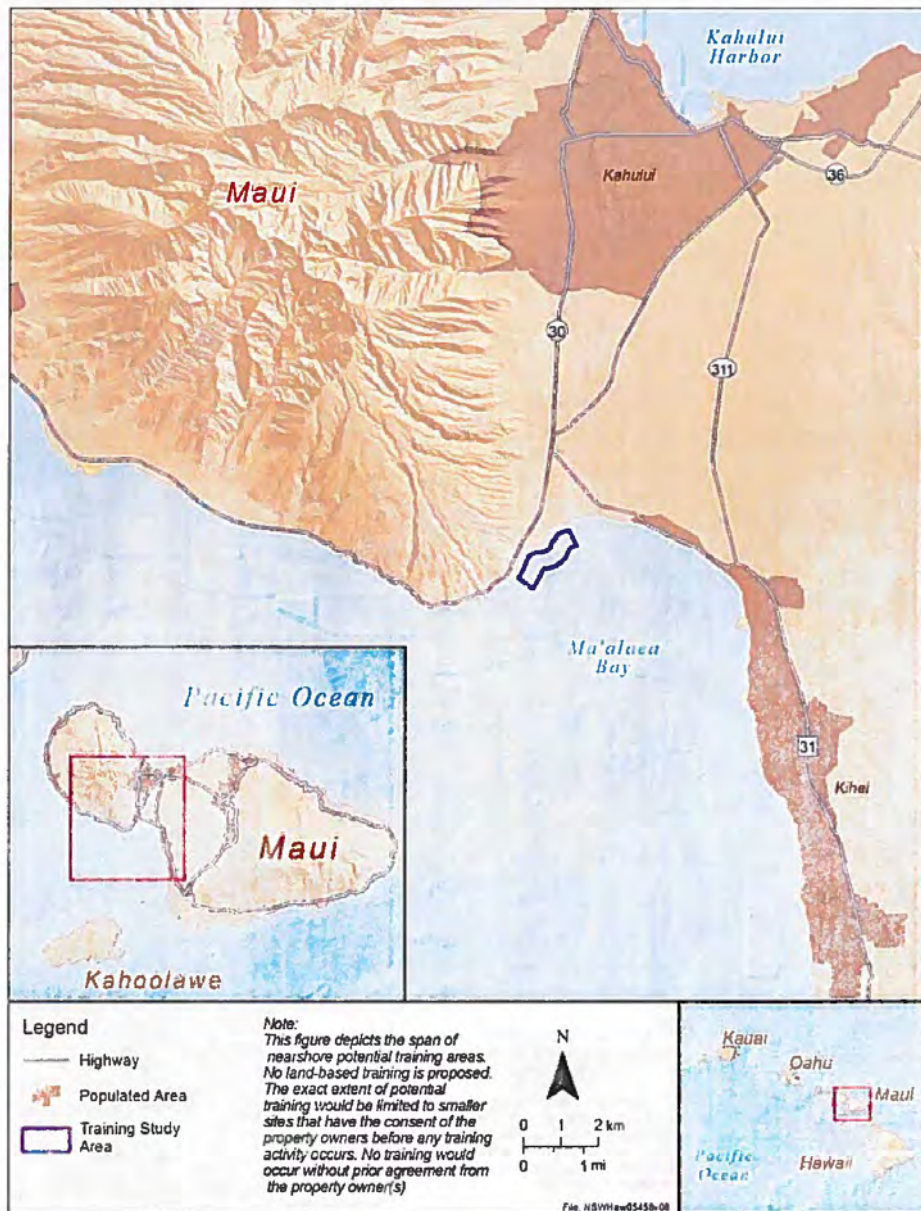


Figure 9: Maui Training Study Area



Figure 10: Lanai Training Study Area

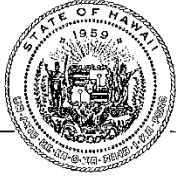


Figure 11: Molokai Training Study Area

**Attachment 3:
Supplemental Information**

- **Attachment 3A- Draft
Environmental
Assessment
(CD Only)**

A.4.3 Hawaii Coastal Zone Management Office Request for Further Information Regarding the Application for Coastal Zone Management Federal Consistency Review for Naval Special Operations Training in Hawaii – Non-Federal Lands (21Jun19)



OFFICE OF PLANNING STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov>

DAVID Y. IGE
GOVERNOR

MARY ALICE EVANS
DIRECTOR
OFFICE OF PLANNING

DTS201906171439NA

June 21, 2019

Mr. Aaron Y. Poentis
Director
Regional Environmental Department
Department of the Navy
Navy Region Hawaii
850 Ticonderoga Street, Suite 110
JBPHH, Hawaii 96860-5101

Dear Mr. Poentis:

Subject: Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii

Additional information is required for the Hawaii Coastal Zone Management (CZM) Program federal consistency review of the U.S. Naval Special Warfare Command proposal to conduct small-unit intermediate and advanced land and maritime training activities for naval special operations personnel on non-federal areas in various locations throughout the State of Hawaii (proposed activity). The additional information, identified below, is required to fully evaluate the consistency of the proposed federal agency activity with the enforceable policies of the Hawaii CZM Program, and to address comments that were received during the federal consistency review.

1. Provide the State Historic Preservation Officer's (SHPO) concurrence with the Navy's effect determination for historic properties for the proposed activity. The Department of Land and Natural Resources (DLNR), State Historic Preservation Division (SHPD) National Historic Preservation Act Section 106 review letter dated April 29, 2019 (enclosed), states: "The SHPO does not concur with the Navy's effect determination of no historic properties affected at this time due to the need for additional information." If the SHPO does not concur with the Navy's effect determination, then the Hawaii CZM Program cannot issue a federal consistency concurrence due to non-consistency with Hawaii Revised Statutes (HRS) Chapter 6E Historic Preservation, which is a federally approved enforceable policy of the Hawaii CZM Program.
2. Provide responses to the comments on the proposed activity by the County of Hawaii Planning Department contained in two letters, dated January 7, 2019, which were transmitted to the Hawaii CZM Program on June 13, 2019 in response to our


Mr. Aaron Y. Poentis
June 21, 2019
Page 2

consultation request for this federal consistency review. This information is required to fully evaluate the consistency of the proposed activity with HRS Chapter 205A Coastal Zone Management, which is a federally approved enforceable policy of the Hawaii CZM Program.

3. Provide responses to the comments on the proposed activity contained in the letter from the DLNR Division of Aquatic Resources (DAR) (enclosed), dated June 18, 2019 (signed June 19, 2019). This information is required to fully evaluate the consistency of the proposed activity with the following federally approved enforceable policies of the Hawaii CZM Program: HRS Chapter 187A Aquatic Resources; HRS Chapter 190 Marine Life Conservation Program; HRS Chapter 195D Conservation of Aquatic Life, Wildlife, and Land Plants; and HRS Chapter 205A Coastal Zone Management.

The required additional information must be received by the Hawaii CZM Program no later than **July 5, 2019** to meet federal consistency review deadlines. If the requested information cannot be provided by **July 5, 2019**, it is recommended that an extension of time for the federal consistency review be requested. The information may be sent to the Hawaii CZM Program at the mailing address above or by email to John Nakagawa of our CZM Program at john.d.nakagawa@hawaii.gov. If you have any questions, please call John Nakagawa at 587-2878.

Sincerely,



Mary Alice Evans
Director

Enclosures

cc: Julie Zimmerman, NAVFAC, Pacific (by email)
Stephanie Hacker, SHPD (by email)
Catherine Gewecke, DAR (by email)

A.4.4 Department of the Navy Response to Hawaii Coastal Zone Management Office Request for Further Information Regarding the Application for Coastal Zone Management Federal Consistency Review for Naval Special Operations Training in Hawaii – Non-Federal Lands (18Jun20)



DEPARTMENT OF THE NAVY
 COMMANDER
 NAVY REGION HAWAII
 850 TICONDEROGA ST STE 110
 JBFHH, HAWAII 96860-5101

5090
 N45
 June 13, 2020

Mary Alice Evans
 State of Hawaii Office of Planning
 Coastal Zone Management Program
 235 Beretania Street, 6th Floor
 Honolulu, HI 96813

SUBJECT: RESPONSE FOR ADDITIONAL INFORMATION REQUESTED – HAWAII COASTAL ZONE MANAGEMENT PROGRAM FEDERAL CONSISTENCY REVIEW OF PROPOSED NAVAL SPECIAL OPERATIONS TRAINING ACTIVITIES ON NON-FEDERAL AREAS, STATE OF HAWAII

Dear Mary Alice Evans,


Additional information was requested in your June 21, 2019 letter for the Hawaii Coastal Zone Management (CZM) Program federal consistency review of the U.S. Naval Special Warfare Command (NSWC) proposal to conduct small-unit, intermediate and advanced land and maritime training activities for naval special operations personnel on non-federal areas in various locations throughout the State of Hawaii (proposed activity). The additional information is provided below and in the associated enclosures.

1. The Hawaii State Historic Preservation Officer's (SHPO) letter of concurrence with the Navy's effect determination for historic properties for the proposed activity is provided in Enclosure 1.
2. Response letters to the comments on the proposed activity by the County of Hawaii Planning Department contained in two letters, dated 07 January 2019, which were transmitted to the Hawaii CZM Program on 13 June 2019 in response to the consultation request for this federal consistency review are provided in Enclosure 2.
3. In order to address the Department of Land and Natural Resources (DLNR) Division of Aquatic Resources (DAR) comments on the proposed training activities, the Navy met in person on two different occasions with DAR staff including Catherine Gewecke, Aquatic Biologist, and Brian Neilson, Acting Administrator. On June 18, 2019 DAR originally submitted comments suggesting large areas in which proposed training activities should not occur. Through in-person meetings, the Navy provided additional details and information about the proposed training locations and on September 24, 2019 DAR submitted modifications to their comments (see Enclosure X). NSWC concurs with all requested modifications per DAR's September 24, 2019 letter. Based on these discussions with DAR, the Navy modified the proposed training activities at the following locations:
 - **Lanai**
 - Manele-Hulopoe Marine Life Conservation District (MLCD) – Hulopoe Bay side
 - Over-the-beach training will not be conducted at this site.
 - NSWC will modify the Insertion and Extraction training activities to outside of the MLCD. NSWC understands that vessels/crafts are not allowed inside the MLCD and will be left at the outer MLCD boundary.

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June 18, 2020

- **Hawaii Island**
 - Kawaihae Harbor – the only activity at this site will be launch and recovery at the local boat ramp. NSWC will coordinate with the State DLNR Division of Boating and Ocean Recreation, as well as the Harbor Master, prior to use.
 - Kaloko – Honokōhau Fish Replenishment Area/Netting Restricted Area (FRA/NRA)
 - This FRA/NRA is located immediately offshore of the Kaloko-Honokōhau National Historical Park (NHP). Per coordination with the National Park Service, training would not be conducted within the NHP or adjacent waters. Therefore, training will not be conducted within the Kaloko – Honokōhau FRA/NRA.
 - Pu'ukoholā Heiau National Historic Park
 - No training is proposed at this site.
 - Lapakahi State Historical Park
 - No training is proposed at this site.
- **Oahu**
 - Pupukea MLCD – Waimea Bay side
 - NSWC will modify the Insertion and Extraction training activity to outside of the MLCD. NSWC understands that vessels/crafts are not allowed inside the MLCD and will be left at the outer MLCD boundary.
 - Ala Moana
 - Over-the-beach training will be conducted at this site.
 - Reconnaissance prior to training is a standard operating procedure for all training events and will be conducted to ensure a viable route to the shoreline.

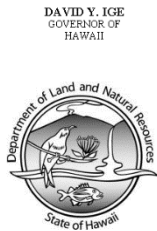
If you have any questions or require further information, please do not hesitate to contact John Bigay, NEPA Planner, Naval Facilities Engineering Command Pacific (john.bigay@navy.mil). We look forward to completing the CZM process and thank you for your assistance.

Sincerely,

J.S. LEFEBVRE
Director (Acting)
Regional Environmental Program
By direction of the Commander

Enclosures:

1. Hawaii SHPO Letter of Concurrence
2. County of Hawaii Response Letters
3. Original and modified DAR comments on Draft EA

Copy to: Hawaii DLNR



DAVID Y. IGE
GOVERNOR OF
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
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SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
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ROBERT K. MASUDA
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M. KALEO MANUEL
DEPUTY DIRECTOR- WATER

AQUATIC RESOURCES
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BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

May 29, 2020

Captain M. R. Delao
Department of the Navy
Commander Navy Region Hawai'i
850 Ticonderoga Street Suite 110
JBPHH, Hawai'i 96860-5101
Email Reply to: Alvin Capili (Alvin.Capili@navy.mil)

IN REPLY REFER TO:
Log No.: 2020.00704
Doc. No.: 2005SH21
Archaeology

Dear Captain Delao:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –
Continued Consultation and Request for Concurrence with the Effect Determination
Proposed Naval Special Operations Training in Hawai'i
Ref. No. 5750 N4**

Various Ahupua'a, Various Districts, Statewide

TMK: Oahu: (1) 3-9-011, (1) 4-1-014, (1) 4-1-001, (1) 4-1-002, (1) 4-1-003, (1) 4-1-004, (1) 4-1-005, (1) 4-1-006, (1) 4-1-007, (1) 4-1-014, (1) 4-1-015, (1) 4-2-002, (1) 4-3-001, (1) 4-3-003, (1) 4-3-004, (1) 4-3-005, (1) 4-3-006, (1) 4-3-007, (1) 4-3-008, (1) 4-3-009, (1) 4-3-010, (1) 4-3-011, (1) 4-3-012, (1) 4-3-013, (1) 4-3-015, (1) 4-3-016, (1) 4-3-017, (1) 4-3-018, (1) 4-3-019, (1) 4-3-020, (1) 4-3-022, (1) 4-3-083, (1) 4-4-008, (1) 4-4-039, (1) 4-5-001, (1) 4-6-005, (1) 4-6-007, (1) 4-6-016, (1) 4-6-019, (1) 4-6-022, (1) 5-9-004, (1) 6-1-001, (1) 6-1-013, (1) 6-2-001, (1) 6-2-002, (1) 6-8-003, (1) 6-8-006, (1) 6-8-011, (1) 6-9-001, (1) 6-9-003, (1) 8-1-001, (1) 8-2-001, (1) 8-3-001, (1) 8-3-010, (1) 8-4-001, (1) 8-4-002, (1) 8-4-004, (1) 8-4-005, (1) 8-4-006, (1) 8-4-007, (1) 8-4-008, (1) 8-4-010, (1) 8-4-012, (1) 8-4-019, (1) 8-4-030, (1) 8-5-001, (1) 8-5-002, (1) 8-5-008, (1) 8-5-011, (1) 8-6-015, (1) 8-5-017, (1) 8-6-001, (1) 8-6-015, (1) 8-6-016, (1) 8-7-005, (1) 8-7-006, (1) 8-7-007, (1) 8-7-008, (1) 8-7-015, (1) 8-7-016, (1) 8-7-023, (1) 8-7-028, (1) 8-9-001, (1) 8-9-006, (1) 9-1-001, (1) 9-1-013, (1) 9-1-014, (1) 9-1-015, (1) 9-1-017, (1) 9-1-056, (1) 9-1-057, (1) 9-2-049, (1) 9-3-001, (1) 9-3-002, (1) 9-6-001, (1) 9-6-003, (1) 9-7-008, (1) 9-8-019, (1) 9-9-001, (1) 9-9-003

Moloka'i: (2) 5-1-002, (2) 5-3-001, (2) 5-4-002

Hawai'i: (3) 5-7-001, (3) 5-7-003, (3) 5-8-001, (3) 5-9-003, (3) 5-9-016, (3) 5-9-017, (3) 6-1-001, (3) 6-1-003, (3) 6-1-004, (3) 6-2-002, (3) 7-2-004, (3) 7-2-005, (3) 7-2-010, (3) 7-2-017, (3) 7-2-019, (3) 7-2-040, (3) 7-3-009, (3) 7-3-043, (3) 7-3-063, (3) 7-4-008, (3) 7-5-005, (3) 7-5-006, (3) 7-5-007, (3) 7-5-008, (3) 7-5-009

Kaua'i: (4) 1-2-001, (4) 1-2-002

On March 27, 2020, the State Historic Preservation Division (SHPD) received a letter March 24, 2020 from the United States Department of the Navy to continue Section 106 consultation and provide additional information requested by the SHPD for the Proposed Naval Special Operations Training across the state of Hawai'i.

In 2019, the Navy submitted a letter to SHPD dated March 22, 2019 to initiate Section 106 consultation for the proposed project and requested the SHPO's concurrence with their effect determination. The SHPO responded in a letter dated April 20, 2019 requesting additional information (SHPD Log. No. 2019.00682, Doc. No. 1904SH09). Subsequently a meeting was held between the Navy and their representatives and SHPD staff at the SHPD office in

Captain M. R. Delao
May 29, 2020
Page 2

Kapolei on October 17, 2019 to discuss the requested information and to consult regarding the project scope and SHPD's concerns with protecting historic properties statewide.

In a letter dated April 27, 2020, the SHPD stated that the Navy's responses addressed the concerns raised regarding the potential to impact historic properties by the proposed actions. However, the SHPO requested the Navy consult with the SHPD every 7 years following concurrence of the proposed undertaking rather than every 15 years as proposed. Additionally, the SHPO requested the Navy provide an example of the information that will be provided regarding this undertaking and historic properties during the Commander, Navy Region Hawaii, Cultural Resources Management On-Site meeting supported by Naval Facilities Engineering Command, Hawaii, EV5.

In an email dated May 6, 2020 the Navy agreed to consult with the SHPD every 7 years following the SHPO's concurrence with the effect determination for the proposed undertaking. Additionally, the Navy developed an excel table depicting the information that will be provided at the annual Cultural Resources Management On-Site meeting. The SHPD replied on May 14, 2020 with a request for minor revisions to the information content to be provided in the excel table and the Navy revised the table as requested in an email dated May 21, 2020. On May 29, 2020, the Navy confirmed the information to be presented in the excel table will be submitted to SHPD annually following the SHPO's concurrence with the Navy's effect determination, regardless of whether the annual meeting is held (email correspondence Coral Rasmussen [Navy] to Susan Lebo and Stephanie Hacker [SHPD]).

The Navy has determined the proposed undertaking will result in *no adverse effect* to historic properties. Based on the above as well as the previous information provided by the Navy describing the efforts to avoid impact to historic properties, **the SHPO concurs** with the determination of *no adverse effect* for the proposed undertaking.

The Department of the Navy is the office of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at Stephanie.Hacker@hawaii.gov or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha,
Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Coral Rasmussen, Navy (Coral.Rasmussen@navy.mil)



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
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N45
June 18, 2020

Michael Yee
Planning Director
County of Hawaii
East Hawaii Office
101 Pauahi Street, Suite 3
Hilo, HI 96720
planning@hawaiicounty.gov

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL
SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Dear Michael Yee:

Thank you for participating in the National Environmental Policy Act (NEPA) process and for your letter of January 7, 2019 providing us with your subject comments. Subsequent to receipt of your letter, on February 7, 2019, Navy representatives met with Mayor Kim and some of his staff and department representatives in Hilo to hear and address concerns. Your Deputy Director, Mr. Duane Kanuha, attended this meeting. The information provided below is the same as the information shared during the meeting and is being provided in support of Hawaii Revised Statutes 343 compliance.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolition, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. As stated in the Draft and Final EAs, the proposed training does not include off-road driving. Pickup trucks and/or a van would be driven on roadways to the training site by support staff and parked in designated parking locations. Road use by NSWC would be the same as road use by the public.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increase in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices (BMPs), including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials or waste would not be generated or released into the environment under the Proposed Action. Under the Proposed Action, military expended material such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training and expended batteries would be recycled or disposed of properly after returning from training activities through existing characterization, recycling, and disposal programs.

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June 18, 2020

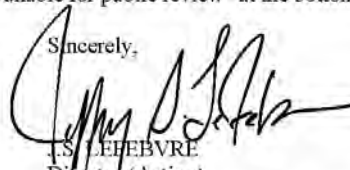
Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the proposed training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (Table 2-4 of the Draft and Final EAs).

As described in Chapter 3, all potentially relevant environmental resources were initially considered for analysis in the Draft EA. In compliance with NEPA, Council on Environmental Quality, and 32 Code of Federal Regulations Part 775 guidelines, the discussion of the affected environment (i.e., existing conditions) focuses only on those resources potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places, including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer, and 62 Native Hawaiian Organizations, historic partners, and the public. Correspondence regarding the National Historic Preservation Act Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,



J.S. LEFEBVRE
Director (Acting)
Regional Environmental Program
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Michael Yee.

Copy to: Hawaii Department of Land and Natural Resources

Harry Kim
Mayor



Michael Yee
Director

Duane Kanuha
Deputy Director

West Hawaii's Office
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County of Hawai'i
PLANNING DEPARTMENT

East Hawaii's Office
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Fax (808) 961-8742

January 7, 2019

Samuel J. Lemmo
Department of Land and Natural Resources
Office of Conservation and Coastal Lands
P.O. Box 621
Honolulu, HI 96809

Dear Mr. Lemmo:

SUBJECT: Draft Environmental Assessment (DEA) 30-Day Comment Period
Project: NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII
TMKs: Various Locations, State of Hawai'i (including island of Hawai'i)

The County of Hawai'i Planning Department offers the following concerns regarding the DEA for the Naval Special Operations Training in the State of Hawai'i. Please accept these in addition to other correspondence from the County Planning Department¹.

1. The DEA appears to be incomplete per HAR Sec. 11-200-10(3)². Hawai'i County was not consulted³ in making the assessment and has not been formally notified via the distribution list for the proposed action⁴.
2. The DEA appears to be incomplete per HAR Sec. 11-200-10(12)⁵. No early consultation was undertaken with Hawai'i County Planning Department; the advice and input of the county agency responsible for implementing the Hawai'i County General Plan did not occur and no consultation was provided.
3. The DEA appears to be incomplete per HAR Sec. 11-200-10(11)⁶. The DEA represents an insufficient analysis of County of Hawai'i permit and approval requirements.

¹ Reference Section 106 letter from Planning Division/CRC

² "Identification of agencies...consulted in making the assessment"

³ HAR 11-200-9(a)(1)

⁴ HAR 11-200-9(a)(6)

⁵ "Written comments and responses to the comments under early consultation provisions of sections 11-200-9(a)(1), 11-200-9(b)(1), or 11-200-15, and statutorily prescribed public review periods"

⁶ "List of all permits and approvals (State, federal, county) required"

Mr. Sam Lemmo
January 7, 2019
Page 2

In the absence of the above required contents⁷, the Hawai'i County Planning Department is unable at this time to provide comprehensive comment, assessment or determination(s) of how likely the action may have a significant effect on the environment⁸.

We look forward to reviewing and commenting on the proposed action once a "full and complete consultation process" is undertaken that does "not rely solely upon the review process to expose environmental concerns"⁹.

If you have any questions, please contact Kevin Sullivan of this office at (808) 961-8135.

Sincerely,



MICHAEL YEE
Planning Director

KS:rl
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⁷ HRS 343-6: Rules
⁸ HAR 11-200-12, HRS 343
⁹ HAR 11-200-15



DEPARTMENT OF THE NAVY

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June 18, 2020

Theresa Donham
County of Hawaii Planning Department
Cultural Resources Commission
Aupuni Center, 101 Pauahi Street, Suite 3
Hilo, HI 96720

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL
SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Dear Theresa Donham:

Thank you for participating in the National Environmental Policy Act process and for your letter of January 7, 2019 providing us with your subject comments. Subsequent to receipt of your letter, on February 7, 2019, Navy representatives met with Mayor Kim and some of his staff and department representatives in Hilo to hear and address concerns. Your comments and all others received on the Draft EA are included in Appendix A (Agency Correspondence) and Appendix C (Public Comments and Responses) of the Final EA. Our responses to your comments follow.

The frequency of training at any one location would be limited to no more than six training events/year under Alternative 1 and no more than 10 training events/year under Alternative 2. The proposed Naval Special Warfare Command (NSWC) activities are consistent with public use and similar to hiking, swimming and camping, just with the intention of not being seen. Additionally, there is no active training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as members of the public and would only interact with the public if there were a chance the public may unintentionally discover trainees. Support staff would visit a training site prior to a training event commencing to determine if there is too much public presence for the training to safely proceed. All training activities would be non-invasive in nature and the Navy has no intention or authority to close public beaches.

NSWC conducted an extensive search for areas that would meet its training requirements and avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of an area at the time the training would be scheduled to occur. Having a varied selection of locations in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training locations minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same areas.

As specific training activities are scheduled, compatible locations within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee

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familiarity with specific locations, area selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training areas more readily allows NSWC to select areas with the goal of separating the military activity from the public, while still meeting its training objectives. To conduct activities in State or County parks, NSWC will coordinate with and obtain permits as required, prior to the use of specified public land. Please note the purple area depicted on the maps in the Draft and Final EAs is a study area and is greater in area than the sites where training activities would occur.

The Area of Potential Effect (APE) for National Historic Preservation Act (NHPA) Section 106 is synonymous with the project Study Area and has been revised for the Final EA. Training would be conducted in selected coastal nearshore waters and shorelines, and inland locations throughout the State of Hawaii. Only water-based and land-based training is proposed for the Island of Hawaii; no air-based training would occur. The APE is larger than the actual area that would be used for the proposed training due to the application of buffer areas, and would be limited to smaller sites on federal land and on state and private land - the latter of which would have the consent of property owners before training activity occurs. The APE/Study Area for Hawaii Island consists of three separate segments of the western coastline: from north to south, the first segment includes the Kohala coast from Mahukona Bay/Beach Park to Kawaihae Harbor; the second segment is from Kahuwai Bay to Puhili Point on the Kona coast; the third segment is from Honokohau Small Boat Harbor to Kahului Bay, also on the Kona coast. Based on coordination and discussion with the National Park Service, the Kaloko-Honokohau National Historical Park and Kealahou Bay have been deleted from the APE/Study Area. Per your comment, the spelling of Kawaihae has been corrected in the Final EA.

The Navy has identified a number of historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources, including Traditional Cultural Properties. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. Also, there is no high-angle climbing proposed on Hawaii Island.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Proposed Action is consistent with HRS Chapter 6E as the Navy has completed NHPA Section 106 consultation with the SHPO and key stakeholders and followed the governing procedures to the maximum extent practicable. The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

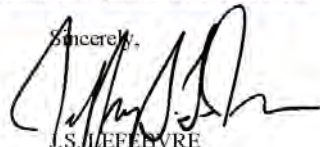
The Navy also coordinated with the Hawaii Coastal Zone Management Program and submitted all required information to complete the Coastal Zone Management Act consistency determination, presented in Appendix A (Agency Correspondence) of the Final EA.

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Table 5-1 (Principal Federal and State Laws Applicable to the Proposed Action) in Section 5.1 (Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions), has been revised to provide a summary of the compliance status for applicable laws and regulations, including Hawaii Revised Statutes (HRS) Chapter 343, HRS Chapter 195D, HRS Chapter 6E, Hawaii Administrative Rules (HAR) Chapter 11-200, and HAR Chapter 13-124. Site-specific real estate agreements would be obtained prior to conducting training in areas where consent is needed.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,



J.S. JEFFEVRE
Director (Acting)
Regional Environmental Program
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Theresa Donham.

Copy to: Hawaii Department of Land and Natural Resources

Harry Kim
Mayor



Theresa Donham, Chair
Deborah Chang, Vice Chair
Alex Akau
Geraldine Bell
Benjamine Heloca
Ke'ala Lee Loy
Christine Wada

County of Hawai'i

PLANNING DEPARTMENT
CULTURAL RESOURCES COMMISSION
Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawai'i 96720
Phone (808) 961-8288 • Fax (808) 961-8742

January 7, 2019

U.S. Naval Special Warfare Command
Julie M. Zimmerman, Senior NEPA Planner (EV21)
Naval Facilities Engineering Command, Pacific
Attention: Project Manager, EV21.JZ
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

Dear Representative of the Department of the Navy:

SUBJECT: Comments Pursuant to Section 106, National Historic Preservation Act and DEA
Project: Proposed Naval Special Operations Training in Hawai'i
Landowners: Numerous
Locations: Numerous

The Hawai'i County Cultural Resources Commission (CRC) was not consulted pursuant to the Section 106 review for this project. The members of the Commission learned of the proposed project from various news sources. The CRC obtained a copy of the Section 106 comment request addressed to Dr. Alan Downer, Deputy State Historic Preservation Officer of the Department of Land and Natural Resources-State Historic Preservation Division (DLNR-SHPD) dated August 22, 2018, as well as the Draft Environmental Assessment (DEA) dated November 2018. The CRC conducted a hearing on this matter on December 12, 2018, and provided comments as several areas of Hawai'i County are proposed for the Naval Special Operations Training. No representative from the Department of the Navy attended the meeting to offer a presentation or answer questions.

Comments provided by the Cultural Resources Commission:

The Hawai'i County Cultural Resources Commission has major concerns regarding the Naval Special Warfare Command's (NSWC) proposal to conduct small-unit, water-based, land-based, and air-based training in the State of Hawai'i, including areas within the County of Hawai'i. The Hawai'i County Cultural Resources Commission's questions and concerns of these documents area are as follows:

1. Area of Potential Effect (APE): The geographic location of the Area of Potential Effect (APE) is inconsistently described throughout the documents for the Island of Hawai'i.

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This is a basic requirement to enable an intelligent response to the Navy's proposal. The Draft Environmental Assessment (DEA) repeatedly describes the APE as including "two stretches of the western coast from Mahukona State Park to Kawaihai Harbor in Kohala and from Hualalai Golf Course to Captain Cook in Kona." (The misspelling of Kawaihai is repeated throughout the DEA.) On page 3-124 it says that the APE is "along two stretches of the Kona coast." This is inconsistent with the earlier statement. The map on page 1-11 shows the "Training Study Area" extending to Kailua-Kona Bay, which is significantly north of Captain Cook. To further confuse the reader, Table 3-8 lists "Kealakekua Bay Historical District" as being in the APE. Does the APE stop at Kailua-Kona Bay or does it continue south to Kealakekua Bay?

2. Potential Impacts: Potential impacts of the proposed training on cultural resources which include the "myriad of year-round mountain and coastal outdoor recreation activities" described in "3.2.2 Affected Environment," could be significant, and the DEA does not address how potential impacts will be mitigated other than repeatedly stating that the duration and frequency of training activities would be "minor and temporary." However, on page 2-22 a training event is described as typically consisting of up to 46 people and could extend for 72 hours. Since training would be occurring on coastal public lands where people frequent, how will public notice be given prior to training events? Will public beaches be closed and for how long? How many years will the training be conducted? Is there an end date?
3. Precautions for the Public: Page 3-58 describes what the Navy would do "if the public enters the training area." Based on their safety assessment, the Navy will "either continue the training, temporarily suspend the training, completely stop the training, or relocate the training to another approved training site." Since the training areas are along the coast where the public can be expected in the ocean or on the beaches, this does not sound like a realistic approach. Instead, precautions should be taken to ensure the public does not enter the training area.
4. Training Locations and Consent: Page 4-164 states that "Training would only occur on non-federal property if proper consent was given," and page 1-2 mentions "right-of-entry" permits for training on non-federal property. Since the water and land-based training would be occurring on public lands, does this mean that permission from the County of Hawai'i would be a requirement? Would the Navy submit a Special Management Area Assessment Application (SMAA) to the County as a means of obtaining "proper consent?" Should a Memorandum of Agreement (MOA) be established with the County of Hawai'i to outline the conditions and responsibilities of using specifically identified public lands where training is to occur? Two MOAs are

Department of the Navy
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mentioned on page 3-126 as existing for Navy undertakings on Kaua'i, so there appears to be precedent for this.

5. Identification of Cultural and Historic Properties: The DEA's identification of cultural and historic properties located in the APE is grossly inadequate. How can culturally and historically significant properties be avoided and protected (as intended on page 3-129) if the Navy does not know where they exist? It is well known in Hawai'i that many of the most sacred and unique sites are not on the National Register of Historic Places (NRHP). It is unacceptable that the Navy expects to receive approvals to proceed with training based on the woefully incomplete listings of historic properties eligible for and included on the NRHP. Page 3-128 states, "No Traditional Cultural Properties have been identified in the APE on Oahu or Hawaii Island." This statement serves to illustrate the need for caution in proceeding with the Navy's training proposal without more in-depth study of the APE.
6. Identification of Ponds: Ponds were essential to the survival of ancient Hawaiians and are culturally important. Archaeological sites are frequently located in and adjacent to ponds. Figure 3-6 implies that there are only two ponds of significance in the APE. This is incorrect, and casts further doubt on the credibility of the DEA. There are many more ponds in the study area, ponds that serve as habitat for endemic birds. Ponds at Kohanaiki as well as the County's sewage treatment plant are frequented by the Hawaiian Stilt and other water birds. Both locations are in the APE, further illustrating the need for more in-depth study of the APE.
7. CZMA Program: Page 3-56 says that activities on non-federal lands will be evaluated by the Hawai'i Coastal Zone Management Program via a "Negative Determination" and a "Federal Consistency Determination." Do state and county agencies participate in those determinations? Is public review a part of those processes?
8. Protection of Cliffs: "High angle climbing" as a training activity should be prohibited on any cliff areas that are prone to crumbling. Examples of erosion-prone cliffs abound on Hawai'i Island, notably in the APE between Māhukona and Kawaihae. There are historic coastal trails at risk of being lost to coastal erosion, and high angle climbing in the wrong locations could exacerbate the loss of historic trails along the coast.
9. Notification: The Section 106 review and the DEA were not sent to the CRC or the Hawai'i County Planning Department for review and comment as required. The Department of the Navy should make every effort to seek comments from all affected government agencies, community groups, affected landowners, cultural descendants, etc.

Department of the Navy
Commander
Page 4
January 7, 2019

10. Permits and Approvals: The Section 106 review and the DEA did not list the permits and/or approvals that would be required for the proposed project. This is a basic requirement of these types of reports. Please include a comprehensive list of all required permits and approvals needed for this project.

Based on the review of the above referenced documents, the CRC has concluded that this project has the potential to have an adverse effect on historic properties on Hawai'i Island. The CRC requests that the Department of the Navy consider revising the DEA and Section 106 review documents to incorporate the above information and reinstate the review process. If you have any questions or require further information, please feel free to contact Jeff Darrow of this office at (808) 961-8158.

Sincerely,



THERESA DONHAM, Chairperson
Hawai'i County Cultural Resources Commission

JWD:klf

F:\wpw\60\Cultural Resources Commission\Projects\Section 106 for Naval Special Operations Training\Dept of the Navy-Section 106 Review-Naval Special Operations Training.doc

cc: Hawai'i County Cultural Resources Commission
Sam Lemmo, DLNR-OCCL

Modifications of DAR Comments Submitted on 6/18/2019 for the State of Hawaii's Coastal Zone Management's Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii

The following areas (listed below) have been either approved, conditionally approved or denied; please see determination next to each location highlighted in yellow. These focused locations are located within larger areas in which DAR originally requested that the proposed training activity not occur. After further evaluation of the proposed activity for each smaller location, DAR has approved certain areas. The approved locations listed below are in addition to all areas indicated as "Approved" in first set of comments (all areas in purple polygons *outside* of yellow or red DAR circled areas), submitted by DAR on 6/18/2019 (also attached at end of this PDF). All applicable requests, recommendations and BMPs from the first set of comments submitted by DAR still apply for the proposed training.

Maui:

- Ma'alaea Boat Harbor (No "Over Beach"): **Approved**

Molokai:

- Kaunakakai Harbor Fisheries Management Area (FMA)(No "Over Beach"- maybe no surface zodiacs?): **Approved**
- Hale o Lono Harbor (No "Over Beach"- maybe no surface zodiacs?): **Approved - DAR still recommends consulting with local practitioners or hui because this is a popular fishing area and may be used for other practices.**

Lanai:

- Manele-Hulopoe Marine Life Conservation District (MLCD - Hulopoe Bay side)(No "Over Beach"): **Approved** – No submarine/zodiacs/jet-skis allowed inside MLCD, leave all vessels/crafts at outer boundary-scuba ok
- Kaunapali Harbor (No "Over Beach"- maybe no surface zodiacs?): **Approved**

Kauai:

- Polihale State Park (Yes "Over Beach"): **Approved (pending State Parks Approval)**

Hawaii island:

- Kawaii Hai Harbor (No “Over Beach”-no activity in inside FMA portion – outer harbor only-except for using boat launch): **Conditionally Approved by DAR if consultation with NPS results in approval**
- Kaloko - Honokōhau FRA/NRA (Yes “Over Beach”): **DAR requests results of NPS consultation before commenting-concerns of submarine and over-beach maneuvers impacting dense coral cover-Not Approved at this time.**

Oahu:

- Pupukeya Marine Life Conservation District (MLCD-Waimea Bay side) (Yes “Over Beach”): **Approved** – No submarine/zodiacs/jet-skis allowed inside MLCD, leave all vessels/crafts at outer boundary - scuba ok. If jet skis are necessary, DAR request another location be utilized for training.
- Kahana Bay) (Yes “Over Beach”): **Approved - DAR still recommends consulting with local practitioners or hui because this is a popular fishing area and may be used for other cultural practices.**
- Makipu’u Beach (Yes “Over Beach”): **Approved**
- Kailua Beach (Yes “Over Beach”): **Approved**
- Keehi Lagoon/Channels/Islands (Yes “Over Beach”): **Approved**
- Ala Moana (Yes “Over Beach”): **Approved – DAR recommends conducting reconnaissance this area in the daytime to locate a viable route to the shoreline – very shallow water with reef flat/potential coral cover between the wave breakers and shoreline - concerns of submarine and over-beach maneuvers impacting reef habitat.**
- Makaha (Yes “Over Beach”): **Approved - DAR still recommends consulting with local practitioners or hui because this may be a popular fishing area and may be used for other cultural practices.**
- **Need to confirm all with DAR Administrator**
- Heeia Boat Harbor (No “Over Beach”-using boat launch only to deploy boat/sub): **Approved**
- Barbers Point Harbor (No “Over Beach”-deep draft harbor): **Approved**
- Maunalua Bay (No “Over Beach”-using boat launch only to deploy boat/sub): **Approved**
- Haleiwa Boat Harbor (right side beach- beach behind Surf and Sea)(Yes “Over Beach”): **Approved**
- Mokuleia: Coming in channel (maybe “Silver Channel”?) (Yes “Over Beach”): **Approved**

Note: All harbor trainings must be approved by and coordinated with DOBOR/Harbor Masters

All applicable requests, recommendations and BMPs

Apart from the approved specific areas above and the areas in the purple polygons. DAR requests no training activities be conducted in areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers) in order to avoid displacement of these user groups or the aquatic resources they may be utilizing. DAR requests the Navy consult with local fishing groups or hui' s or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. Select areas on each island (circled in YELLOW in maps at end of the comments in Appendix 1) may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). Some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions. DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division Cetacean Research Program, and Protected Species Division Marine Turtle Biology and Assessment Program) to determine the overlap of proposed training areas where protected cetaceans, monk seals and sea turtles may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in near shore waters or on beaches.

DAR requests that the Navy consult with State of Hawaii Division of Forestry and Wildlife (DOFAW/DLNR) or the US Fish and Wildlife Service (USFWS) to determine the overlap of proposed training areas where protected sea birds may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in nearshore waters or on beaches. Entanglement Prevention. Efforts will be made by the Navy to utilize best management practices to eliminate any potential for entanglement of marine organisms. Entanglement prevention practices will include but are not limited to: ensuring that any ropes or lines for buoys or anchors remain taut with no slack at all time. Eliminating any structures or components that may potentially cause entanglement in any training equipment. Attending any structures or components that may potentially cause entanglement at all times and removing any training gear or structures from the marine environment or shoreline after use (e.g. do not leave training gear or structures overnight unattended). The Navy will immediately notify DAR and the federal appropriate agency to report the entanglement of any protected species if incidental entanglement occurs.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 (in addition to any other measures necessary) to avoid any potential damage to coral or live rock, including reconnaissance to identify or map out aquatic resources (e.g. shallow water coral or live rock) that could potentially come into contact with the boats, jet skis, submersibles, ROVs, UUV's, divers, gear or tools lowered to the sea floor, or any other objects used in the trainings). Reconnaissance should determine viable navigable routes that would avoid contact with these coral and live rock resources during the trainings.

Under section § 13-95-70 Stony corals and § 13-95-71 Live Rock (Hawaii Administrative Rules) it is unlawful for any person to take, break, or damage any stony coral or live rock except for inadvertent breakage, damage, or displacement of an aggregate area of less than one half square meter of coral or less than one square meter of live rock if caused by: (1) A vessel with a single anchor damage incident, in an area where anchoring is not otherwise prohibited, and not more frequently than once per year; or (2) Accidental physical contact by an individual person.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity (in addition to any other measures necessary), to avoid any potential damage or incidental takes to protected species (e.g. monk seals, sea turtles, cetaceans). DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division Cetacean Research Program, and Protected Species Division Marine Turtle Biology and Assessment Program) to determine if any other BMPs should be implemented during training activities to avoid damage or interactions with protected species. Please see attached maps and associated information for DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) circled in RED in maps at end of comments in Appendix 1 and select areas on each island that may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), circled in YELLOW in maps at end of the comments in Appendix 1, including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui' s or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. As stated above some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

Thank you for providing DAR the opportunity to review and comment on the Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.



STATE OF HAWAII
 DEPARTMENT OF LAND AND NATURAL RESOURCES
 DIVISION OF AQUATIC RESOURCES
 1151 PUNCHBOWL STREET, ROOM 330
 HONOLULU, HAWAII 96813
 Date: 6/18/2019
 DAR # 5935

SUZANNE D. CASE
 CHAIRPERSON
 BOARD OF LAND AND NATURAL RESOURCES
 COMMISSION ON WATER RESOURCE MANAGEMENT
 ROBERT K. MASUDA
 FIRST DEPUTY
 M. KALEO MANUEL
 DEPUTY DIRECTOR - WATER
 AQUATIC RESOURCES
 BOATING AND OCEAN RECREATION
 BUREAU OF CONVEYANCES
 COMMISSION ON WATER RESOURCE MANAGEMENT
 CONSERVATION AND COASTAL LANDS
 CONSERVATION AND RESOURCES ENFORCEMENT
 ENGINEERING
 FORESTRY AND WILDLIFE
 HISTORIC PRESERVATION
 KAHOOHAWE ISLAND RESERVE COMMISSION
 LAND
 STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
 DAR Administrator

FROM: Catherine Gewecke, Aquatic Biologist

SUBJECT: Hawaii CZM Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii

Request Submitted by: Hawaii Coastal Zone Management Program

Location of Project: State of Hawaii (Hawaii Island, Oahu, Maui, Molokai, Lanai and Kauai)


Brief Description of Project:

The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Comments:

No Comments Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved:  Date: 6/19/19
 Brian J. Neilson
 Acting DAR Administrator

DAR# 5935

Brief Description of Project

The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Water-based training activities would use existing federal and non-federal boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. A ship launch may also occur during training activities in locations that are not served by an existing boat ramp (specific offshore locations of Oahu, Maui, the Island of Hawaii, Kauai, Lanai, and Molokai) or if weather or tidal conditions result in a safety concern regarding a boat ramp launch.

The categories of water-based activities that are analyzed in this document are:

- Diver/Swimmer Training Activities - During diver/swimmer training events, trainees would swim or dive to an objective area (e.g., harbor, beach, moored vessel) for up to six hours. During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location to the support staff. Rubber replica weapons could be carried by trainees to reproduce the bulk and weight of the gear the trainee would carry during an actual mission. Depths for this activity range up to 28 feet (ft) (8.5 meters [m]).
- Insertion and Extraction Training Activities - During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include UUV and ROVs, or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training. Rubber replicate weapons could be carried by trainees to imitate real world events. In three military areas (Puuloa Range Training Facility, JBPHH Pearl City Peninsula, and Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility), actual weapons could be carried by trainees to existing live-fire training ranges. Depths for this activity can vary.

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Brief Description of Project

- **Launch and Recovery Training Activities-** During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge. Vessels such as small ships, jet skis, or small boats may be used in conjunction with training systems during certain training scenarios, and for safety and training support.
- **Unmanned Underwater Vehicle (UUV) Activities-** A subset of water-based training would involve the use of a UUV and, on occasion, a remotely operation vehicle (ROV) (herein both described as UUVs). A UUV is a small, battery-powered, unmanned submersible that is hand-launched from a host vessel and used to conduct bathymetric, oceanographic, and other geographic underwater surveys. The UUVs operate within the water column and would not be set on the floor of the ocean. UUVs operate under the same navigational rules as any water vessel and would be operated to avoid other vessels. Training activities requiring a UUV would occur concurrently approximately 30 percent of the time when diver/swimmer training activities are taking place. The launching and recovery of the UUV would be conducted in water areas only and consist of launching and recovering up to two UUVs per training event. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. Underwater areas to be surveyed by the UUV are pre-programmed into the vehicles' navigation system prior to launch. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recovered at any point along the pre-programmed track. Depths for this activity range up to 328 ft (100 m).
- **Beach Landings/Over the Beach (as part of water-based activities) -** Some water-based activities may include a beach landing for the trainee or watercraft (e.g., diver/swimmer, launch and recovery training activities). During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective.
- **Landing/Drop Zone (as part of air-based activities) -** Naval special operations personnel would utilize existing and new water-based drop zones within JBPHH and MCBH property to conduct air-based training activities. Water-based drop zone training activities would be conducted at sites where up to 40 trainees land after parachuting from fixed-wing aircraft at an altitude between 5,000 - 1,500 feet above ground level (AGL). Water-based drop zones may also

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Brief Description of Project

be utilized for training activities where helicopters or MV-22 aircraft approach the water surface (approximately 15 ft. AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 ft. AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area (on land or over water), trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- o Include up to 6 hours of aircraft operation per training event
- o Utilize AC-130, C-17 and MV-22 aircraft to support training with parachutes
- o Utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation over land or water
- o Hover for approximately 15 minutes when facilitating drop zone training activities
- o Coordinate use of airspace with Federal Aviation Administration Honolulu Control Facility as far in advance as possible

While training activities and events are carefully planned out, unexpected situations may occur and the Navy has planned for such contingencies. Signaling devices, such as marine flare signals, marine smoke signals, and audible recall signals are only for emergency use in accordance with naval special operations standard operating procedures established by the Navy. Navy-owned Wave Runners jet skis are used for swimmer safety and rapid response in certain events during training.

2.2 Location

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the Main Hawaiian Islands (MHI) (Figure 2-1).

The training study area includes five regions on Oahu (Figure 2-2): (1) Joint Base Pearl Harbor-Hickam (Figure 2-3), (2) South (Figure 2-4), (3) Windward (Figure 2-5), (4) North (Figure 2-6), and (5) West Oahu (Figure 2-7). The training study area also includes sites on or near the Island of Hawaii (Figure 2-8), Kauai (Figure 2-9), Maui (Figure 2-10), Lanai (Figure 2-11), and Molokai (Figure 2-12). Training activities would occur on federal and non-federal property, pending appropriate approvals. Training locations will vary due to seasonal weather

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conditions, public presence at sites, protected natural resources considerations, training qualifications to be satisfied, and training requirements. If a particular non-federal site is selected for a potential training event, communication with individual public property managers and private property owners would be conducted to establish or confirm real estate agreements to allow for training activities to be conducted.

The proposed training would take place in selected coastal nearshore waters throughout the State of Hawaii. Personnel will be familiar with locations prior to training at those locations, because reconnaissance visits to a location will be conducted prior to attempting to train in a realistic scenario. Navy divers are trained to make detailed observations about locations during reconnaissance, therefore diving personnel will be able to plan how to avoid and minimize effects to the marine environment at each location prior to training instead of responding or making decisions at the time of training without prior knowledge.

A series of best management practices (BMPs) will be applied during the proposed action. The BMPs are divided into two parts (A and B) and are outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity. Part A includes BMPs directed at minimizing effects from the training on protected species. Part B includes BMPs that minimize effects from the training on the environment (including EFH). BMPs will be incorporated into the training scenario and training events, and all trainees and support personnel will be fully briefed on the BMPs and the requirement to adhere to them during the training.

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Comments

DAR requests no training activities be conducted in DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) including the following areas on each island (circled in RED in maps at end of comments in Appendix 1):

Hawaii island: West Hawaii Regional Fishing Management Area (WHRFMA)

Oahu: Pupukeya Marine Life Conservation District (MLCD)

Molokai: Kaunakakai Harbor Fisheries Management Area (FMA)

Lanai: Manele-Hulopoe Marine Life Conservation District (MLCD)

Maui: n/a - No DAR managed area within proposed training area

Kauai: n/a - No DAR managed area within proposed training area

A dynamic ArcGIS Online map of DAR marine managed areas can be referenced here:

<http://histategis.maps.arcgis.com/apps/webappviewer/index.html?id=c0dc296ff373486baa9e041e40f445b2>

Static maps of DAR marine managed areas can be referenced here:

<http://dlnr.hawaii.gov/dar/fishing/fishing-regulations/regulated-areas/>

DAR requests no training activities be conducted in areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers) in order to avoid displacement of these user groups or the aquatic resources they may be utilizing. DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. Select areas on each island (circled in YELLOW in maps at end of the comments in Appendix 1) may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). Some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division / Cetacean Research Program, and Protected Species Division / Marine Turtle Biology and Assessment Program) to determine the overlap of proposed training areas where protected cetaceans, monk seals and sea turtles may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in near shore waters or on beaches.

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DAR# 5935

Comments

DAR requests that the Navy consult with State of Hawaii Division of Forestry and Wildlife (DOFAW/DLNR) or the US Fish and Wildlife Service (USFWS) to determine the overlap of proposed training areas where protected sea birds may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in nearshore waters or on beaches.

Entanglement Prevention. Efforts will be made by the Navy to utilize best management practices to eliminate any potential for entanglement of marine organisms. Entanglement prevention practices will include but are not limited to: ensuring that any ropes or lines for buoys or anchors remain taut with no slack at all time. Eliminating any structures or components that may potentially cause entanglement in any training equipment. Attending any structures or components that may potentially cause entanglement at all times and removing any training gear or structures from the marine environment or shoreline after use (e.g. do not leave training gear or structures over night unattended). The Navy will immediately notify DAR and the federal appropriate agency to report the entanglement of any protected species if incidental entanglement occurs.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 (in addition to any other measures necessary) to avoid any potential damage to coral or live rock, including reconnaissance to identify or map out aquatic resources (e.g. shallow water coral or live rock) that could potentially come into contact with the boats, jet skis, submersibles, ROVs, UUV's, divers, gear or tools lowered to the sea floor, or any other objects used in the trainings). Reconnaissance should determine viable navigable routes that would avoid contact with these coral and live rock resources during the trainings.

Under section §13-95-70 Stony corals and §13-95-71 Live Rock (Hawaii Administrative Rules) it is unlawful for any person to take, break, or damage any stony coral or live rock except for inadvertent breakage, damage, or displacement of an aggregate area of less than one half square meter of coral or less than one square meter of live rock if caused by:

- (1) A vessel with a single anchor damage incident, in an area where anchoring is not otherwise prohibited, and not more frequently than once per year; or
- (2) Accidental physical contact by an individual person.

DAR# 5935

Comments

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity (in addition to any other measures necessary), to avoid any potential damage or incidental takes to protected species (e.g. monk seals, sea turtles, cetaceans). DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division / Cetacean Research Program, and Protected Species Division / Marine Turtle Biology and Assessment Program) to determine if any other BMPs should be implemented during training activities to avoid damage or interactions with protected species.

Please see attached maps and associated information for DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) circled in RED in maps at end of comments in Appendix 1 and select areas on each island that may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), circled in YELLOW in maps at end of the comments in Appendix 1, including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. As stated above some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

Thank you for providing DAR the opportunity to review and comment on the Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.

Appendix 1. Maps and Comments

Naval Special Operations Hawaii
Hawaii ESA and EFH Consultation

November 2018



Figure 2-2- Overall Oahu Island Training Study Area

Figure 2-2. Proposed areas for Training and Testing on Oahu. Please reference maps below to see **A)** Areas in which DAR requests no training be conducted (**RED** circles) due to aquatic resource management efforts (DAR marine managed areas including MLCDs, FMA, FRA, etc.) and **B)** Areas in which DAR requests no training be conducted (**YELLOW** circles) due to user conflict (fishers, divers, surfers, swimmers, residents, etc.). **If activity is necessary to conduct in B) Areas that may have user conflict, DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity.**

Naval Special Operations Hawaii
Hawaii ESA and EFH Consultation

November 2018

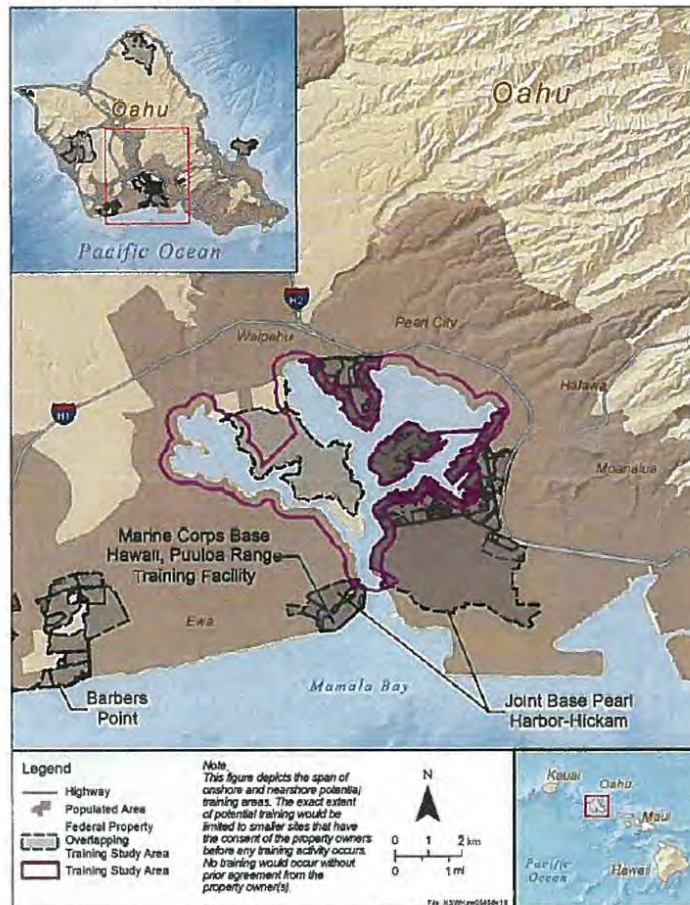


Figure 2-3: Oahu Joint Base Pearl Harbor-Hickam Training Study Area

Figure 2-3. Oahu Joint Base Pearl Harbor-Hickam. Concern with conducting training operations in Joint Base Pearl Harbor-Hickam is low, however fishers may utilize the various shorelines in this area so it is recommended to consult with any fisher groups or hui's that may be able to provide input on areas that may be affected less than others by the training. In addition, DAR requests that the Navy consult with Oahu Waterkeeper to identify the location of multiple oyster cages that were recently deployed in the Spring of 2019 for a water bio-remediation project. The oysters in these cages require various amounts of funding, time and effort to outplant for restoration and may present a navigational or swimming hazard.

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Figure 2-4: South Oahu Region Training Study Area

Figure 2-4. South Oahu. DAR requests no training activities be conducted from Kaka’ako to Magic Island, Maunalua Bay, Iroquoise Point to Barbers Point beach just south of Barbers Point Boat Harbor (boat ramp is used for fishing) in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers).

Naval Special Operations Hawaii
Hawaii ESA and EFH Consultation

November 2018

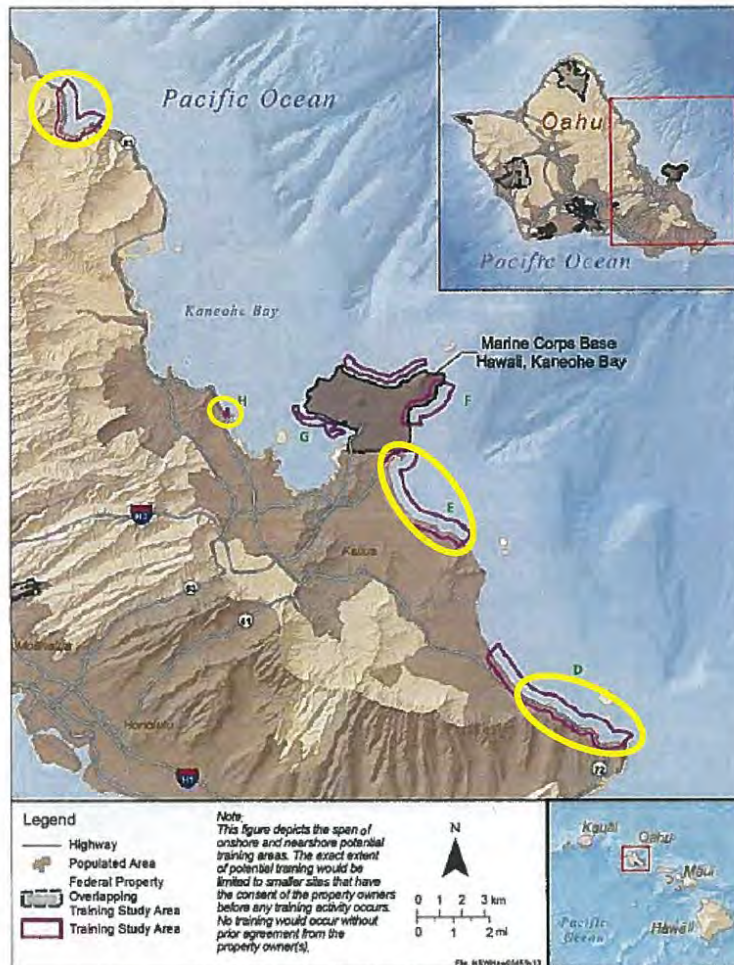
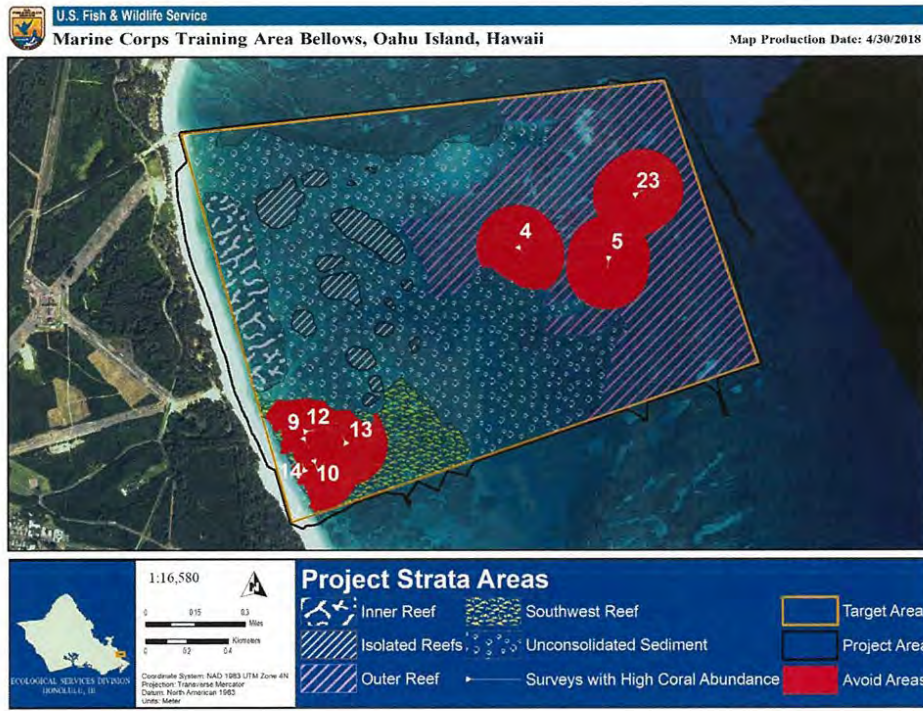


Figure 2-5: Windward Oahu Region Training Study Area

Figure 2-5. Windward Oahu Region (Waimanalo, Bellows, Kailua): DAR recommends Kaneohe Marine Corps Base Hawaii (KMCBH) and Bellows beach as the training areas. DAR requests no training activities be conducted in Waimanalo, Kailua, Kaneohe Bay by Kahalu'u or Kahana, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers).



Note on Bellows Beach:

Efforts will be made by permittee and authorized assistants to ensure that the training is conducted in such a manner as the process does not result in any additional harm to surrounding organisms or environment. The above map indicates where areas with high coral abundance are located, and should be avoided in the Bellows area. Other recommendations for this area are located in the Final Planning Aid Report (Fish & Wildlife Coordination Act): Marine Habitat Characterization Marine Corps Training Area Bellows (Oahu Island, Hawaii) on pages 233-238.

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Hawaii ESA and EFH Consultation

November 2018

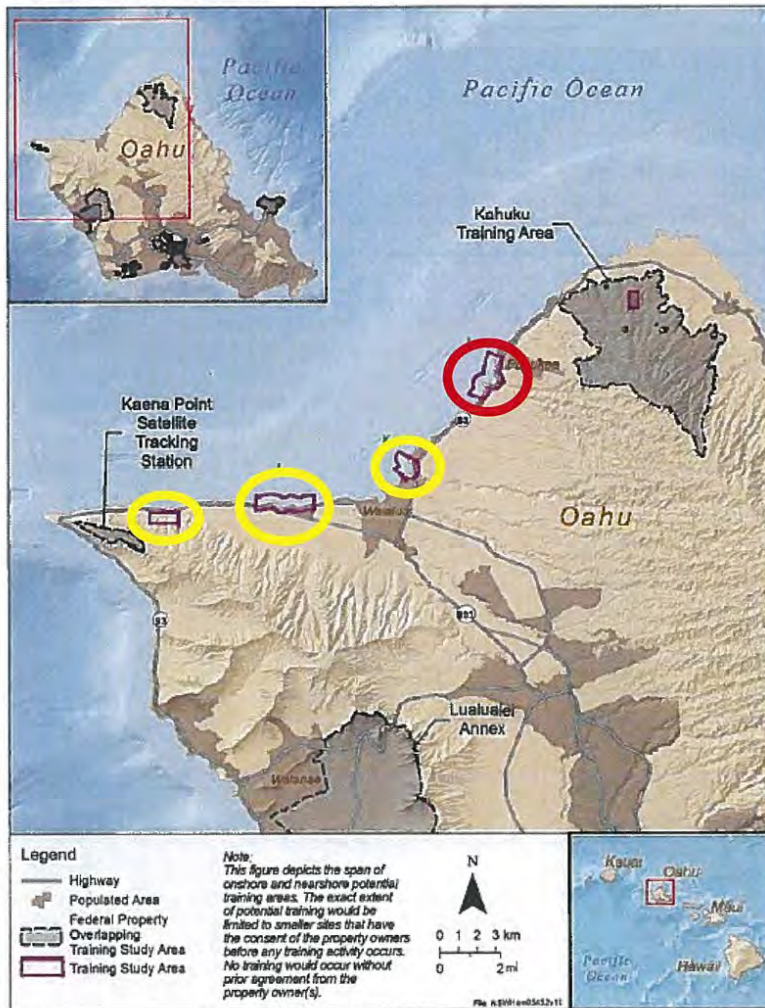


Figure 2-6: North Oahu Region Training Study Area

Figure 2-6. North Oahu. DAR requests no training activity be conducted in this area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as Pūpūkea MLCD (red circle) is one of the proposed areas and the rest of the areas proposed (yellow circles) consist of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers).

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Figure 2-7: West Oahu Region Training Study Area

Figure 2-7. West Oahu. DAR requests no training activities be conducted from north of Ko’olina to Kea’au and potentially Yokohama Bay and Makua Beach, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers). Navy should consult with State of Hawaii Division of State Parks and local fishing groups or hui’s or cultural practitioners for potential activity in Makua area.

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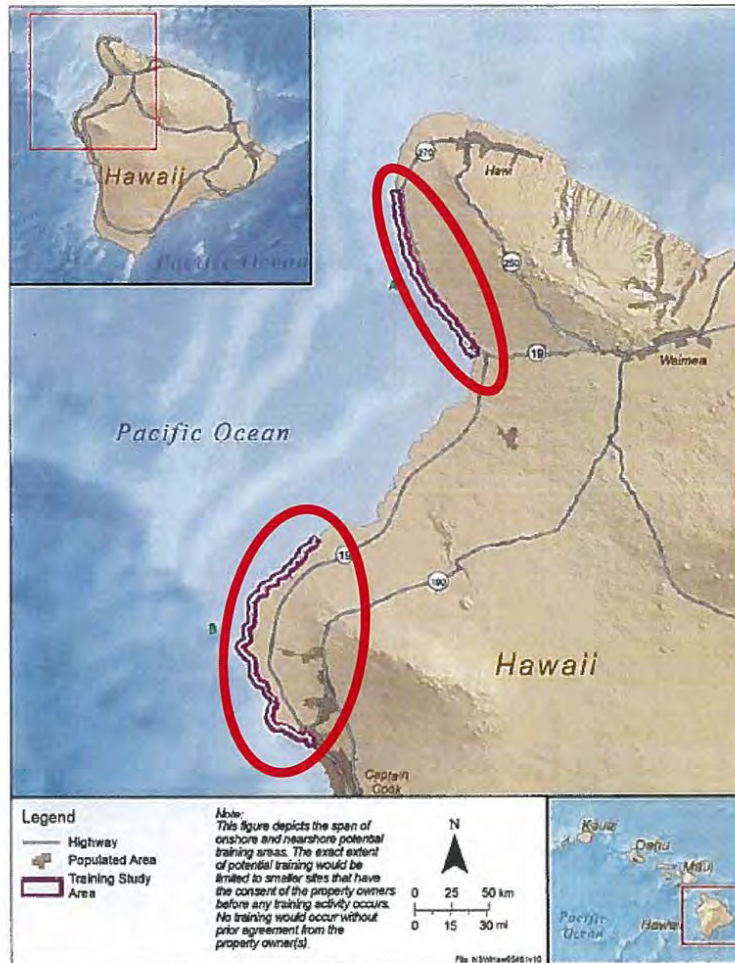


Figure 2-8: Island of Hawaii Training Study Area

Figure 2-8. Island of Hawaii. DAR requests no training activity be conducted in this area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the entire west shoreline of West Hawaii is part of the West Hawaii Regional Fishing Management Area and also consists of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers).

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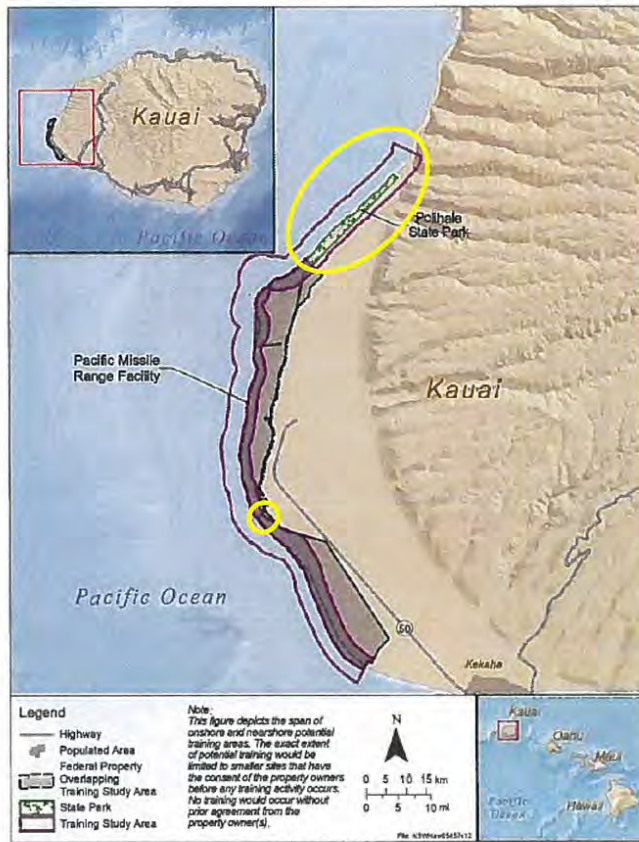


Figure 2-9- Kauai Training Study Area

Figure 2-9. Kauai. Low Concern with conducting training operations in most of this area, however Navy should consult with NOAA Protected Species Division to determine areas that may have frequent pupping or resting monk seals in the Barking Sands area. Majors Bay (small yellow circle within Barking Sands area) is also popular surf spot that may have surfer interaction. DAR requests no training activities be conducted along Polihale State Park, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers). The Navy should consult with State of Hawaii Division of State Parks if activity is necessary in Polihale State Park.

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Figure 2-10: Maui Training Study Area

Figure 2-10. Maui Training Study Area. Low Concern with conducting training operations in this area, but DAR recommends that Ma'alaea Boat Harbor be avoided due user conflict (boaters, fishers, etc.). This area is busy with frequent boat traffic from Maui to Molokini, for whale watching, fishing, eco-tourism etc.

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November 2018



Figure 2-11: Lanai Training Study Area

Figure 2-11. Lanai. DAR requests no training activity be conducted in the red outlined area (Manele-Hulopoe Marine Life Conservation District) as this a DAR marine managed area and is also busy with boat traffic. In addition, DAR requests no training activity be conducted in the yellow outlined area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the east shoreline of Lanai may consist of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners, that may be located in each area, for approval and avoid areas that may have high subsistence fishing activity if *any* activity is to be conducted on Lanai. In addition, the Navy should consult with Larry Ellison for conducting operation specific to Lanai.

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Figure 2-12: Molokai Training Study Area

Figure 2-12. Molokai. DAR requests no training activity be conducted in the red outlined area (Kaunakekai Boat Harbor) as this a DAR marine managed area and is also busy with boat traffic. In addition, DAR requests no training activity be conducted in the yellow outlined area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the entire south shoreline of Molokai consists of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners, that may be located in each area, for approval and avoid areas that may have high subsistence fishing activity if any activity is to be conducted on Molokai.

A.4.5 State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources: Modifications to DAR Comments for the State of Hawaii Coastal Zone Management Federal Consistency Review for Naval Special Operations Training in Hawaii – Non-Federal Lands (29Jun20)



STATE OF HAWAII
 DEPARTMENT OF LAND AND NATURAL RESOURCES
 DIVISION OF AQUATIC RESOURCES
 1151 PUNCHBOWL STREET, ROOM 330
 HONOLULU, HAWAII 96813

Date: 6/29/2020
 DAR # 5935-A

SUZANNE D. CASE
 CHAIRPERSON
 BOARD OF LAND AND NATURAL RESOURCES
 COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
 FIRST DEPUTY

M. KALE O MANUEL
 ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
 BOATING AND OCEAN RECREATION
 BUREAU OF CONVEYANCES
 COMMISSION ON WATER RESOURCE MANAGEMENT
 CONSERVATION AND COASTAL LANDS
 CONSERVATION AND RESOURCES ENFORCEMENT
 ENGINEERING
 FORESTRY AND WILDLIFE
 HISTORIC PRESERVATION
 KAHOLAWE ISLAND RESERVE COMMISSION
 LAND
 STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
 DAR Administrator

FROM: Catherine Gewecke _____, Aquatic Biologist

SUBJECT: Modifications-DAR Comments for the State of HI CZM's Fed. Consistency Review of Naval Special Operations Training Activities on Non-Fed. Areas, HI

Request Submitted by: Hawaii Coastal Zone Management Program

Location of Project: State of Hawaii (Hawaii Island, Oahu, Maui, Molokai, Lanai and Kauai)

Brief Description of Project:

Modifications of DAR Comments Submitted on 6/18/2019 (see original comments at end). The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Comments:

No Comments Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved: *Brian J. Neilson* Date: Jun 30, 2020
 Brian J. Neilson
 DAR Administrator

DAR# 5935-A

Brief Description of Project

Modifications of DAR Comments Submitted on 6/18/2019 (see original comments at end). The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Water-based training activities would use existing federal and non-federal boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. A ship launch may also occur during training activities in locations that are not served by an existing boat ramp (specific offshore locations of Oahu, Maui, the Island of Hawaii, Kauai, Lanai, and Molokai) or if weather or tidal conditions result in a safety concern regarding a boat ramp launch.

The categories of water-based activities that are analyzed in this document are:

- Diver/Swimmer Training Activities - During diver/swimmer training events, trainees would swim or dive to an objective area (e.g., harbor, beach, moored vessel) for up to six hours. During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location to the support staff. Rubber replica weapons could be carried by trainees to reproduce the bulk and weight of the gear the trainee would carry during an actual mission. Depths for this activity range up to 28 feet (ft) (8.5 meters [m]).
- Insertion and Extraction Training Activities - During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include UUV and ROVs, or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training. Rubber replicate weapons could be carried by trainees to imitate real world events. In three military areas (Puuloa Range Training Facility, JBP HH Pearl City Peninsula, and Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility), actual weapons could be carried by trainees to existing live-fire training ranges. Depths for this activity can vary.

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- **Launch and Recovery Training Activities-** During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge. Vessels such as small ships, jet skis, or small boats may be used in conjunction with training systems during certain training scenarios, and for safety and training support.
- **Unmanned Underwater Vehicle (UUV) Activities-** A subset of water-based training would involve the use of a UUV and, on occasion, a remotely operation vehicle (ROV) (herein both described as UUVs). A UUV is a small, battery-powered, unmanned submersible that is hand-launched from a host vessel and used to conduct bathymetric, oceanographic, and other geographic underwater surveys. The UUVs operate within the water column and would not be set on the floor of the ocean. UUVs operate under the same navigational rules as any water vessel and would be operated to avoid other vessels. Training activities requiring a UUV would occur concurrently approximately 30 percent of the time when diver/swimmer training activities are taking place. The launching and recovery of the UUV would be conducted in water areas only and consist of launching and recovering up to two UUVs per training event. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. Underwater areas to be surveyed by the UUV are pre-programmed into the vehicles' navigation system prior to launch. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recovered at any point along the pre-programmed track. Depths for this activity range up to 328 ft (100 m).
- **Beach Landings/Over the Beach (as part of water-based activities) -** Some water-based activities may include a beach landing for the trainee or watercraft (e.g., diver/swimmer, launch and recovery training activities). During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective.
- **Landing/Drop Zone (as part of air-based activities) -** Naval special operations personnel would utilize existing and new and water-based drop zones within JBPHH and MCBH property to conduct air-based training activities. Water-based drop zone training activities would be conducted at sites where up to 40 trainees land after parachuting from fixed-wing aircraft at an

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altitude between 5,000 - 1,500 feet above ground level (AGL). Water-based drop zones may also be utilized for training activities where helicopters or MV-22 aircraft approach the water surface (approximately 15 ft. AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 ft. AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area (on land or over water), trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- o Include up to 6 hours of aircraft operation per training event
- o Utilize AC-130, C-17 and MV-22 aircraft to support training with parachutes
- o Utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation over land or water
- o Hover for approximately 15 minutes when facilitating drop zone training activities
- o Coordinate use of airspace with Federal Aviation Administration Honolulu Control Facility as far in advance as possible

While training activities and events are carefully planned out, unexpected situations may occur and the Navy has planned for such contingencies. Signaling devices, such as marine flare signals, marine smoke signals, and audible recall signals are only for emergency use in accordance with naval special operations standard operating procedures established by the Navy. Navy-owned Wave Runners jet skis are used for swimmer safety and rapid response in certain events during training.

2.2 Location

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the Main Hawaiian Islands (MHI) (Figure 2-1).

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Brief Description of Project

The training study area includes five regions on Oahu (Figure 2-2): (1) Joint Base Pearl Harbor-Hickam (Figure 2-3), (2) South (Figure 2-4), (3) Windward (Figure 2-5), (4) North (Figure 2-6), and (5) West Oahu (Figure 2-7). The training study area also includes sites on or near the Island of Hawaii (Figure 2-8), Kauai (Figure 2-9), Maui (Figure 2-10), Lanai (Figure 2-11), and Molokai (Figure 2-12). Training activities would occur on federal and non-federal property, pending appropriate approvals. Training locations will vary due to seasonal weather conditions, public presence at sites, protected natural resources considerations, training qualifications to be satisfied, and training requirements. If a particular non-federal site is selected for a potential training event, communication with individual public property managers and private property owners would be conducted to establish or confirm real estate agreements to allow for training activities to be conducted.

The proposed training would take place in selected coastal nearshore waters throughout the State of Hawaii. Personnel will be familiar with locations prior to training at those locations, because reconnaissance visits to a location will be conducted prior to attempting to train in a realistic scenario. Navy divers are trained to make detailed observations about locations during reconnaissance, therefore diving personnel will be able to plan how to avoid and minimize effects to the marine environment at each location prior to training instead of responding or making decisions at the time of training without prior knowledge.

A series of best management practices (BMPs) will be applied during the proposed action. The BMPs are divided into two parts (A and B) and are outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity. Part A includes BMPs directed at minimizing effects from the training on protected species. Part B includes BMPs that minimize effects from the training on the environment (including EFH). BMPs will be incorporated into the training scenario and training events, and all trainees and support personnel will be fully briefed on the BMPs and the requirement to adhere to them during the training.

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Comments

Modifications of DAR Comments Submitted on 6/18/2019 for the State of Hawaii's Coastal Zone Management's Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii.

The following areas (listed below) have been either approved, conditionally approved or denied; please see determination next to each location at end of sentence. These focused locations are located within larger areas in which DAR originally requested that the proposed training activity not occur. After further evaluation of the proposed activity for each smaller location, DAR has approved certain areas. The approved locations listed below are in addition to all areas indicated as "Approved" in first set of comments (all areas in purple polygons outside of yellow or red DAR circled areas), submitted by DAR on 6/18 2019 (also attached at end of this PDF). All applicable requests, recommendations and BMPs from the first set of comments submitted by DAR still apply for the proposed training.

Maui:

o Ma'alaea Boat Harbor (No "Over Beach"): Approved

Molokai:

o Kaunakakai Harbor Fisheries Management Area (FMA)(No "Over Beach"- maybe no surface zodiacs): Approved

o Hale o Lono Harbor (No "Over Beach"- maybe no surface zodiacs): Approved - DAR still recommends consulting with local practitioners or hui because this is a popular fishing area and may be used for other practices.

Lanai:

o Manele-Hulopoe Marine Life Conservation District (MLCD - Hulopoe Bay side)(No "Over Beach"): Approved – No submarine/zodiacs/jet-skis allowed inside MLCD, leave all vessels/crafts at outer boundary-scuba ok

o Kaunalapau Harbor (No "Over Beach"- maybe no surface zodiacs): Approved

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Kauai:

o Polihale State Park (Yes "Over Beach"): Approved (pending State Parks Approval)

Hawaii island:

o Kawaihae Harbor (No "Over Beach"-no activity in inside FMA portion – outer harbor only-except for using boat launch): Conditionally Approved by DAR if consultation with NPS results in approval.

o Kaloko - Honokōhau FRA/NRA (Yes "Over Beach"): DAR requests results of NPS consultation before commenting-concerns of submarine and over-beach maneuvers impacting dense coral cover-Not Approved at this time.

Oahu:

o Pupukeya Marine Life Conservation District (MLCD-Waimea Bay side) (Yes "Over Beach"): Approved – No submarine/zodiacs/jet-skis allowed inside MLCD, leave all vessels/crafts at outer boundary - scuba ok. If jet skis are necessary, DAR request another location be utilized for training.

o Kahana Bay (Yes "Over Beach"): Approved - DAR still recommends consulting with local practitioners or hui because this is a popular fishing area and may be used for other cultural practices.

o Makipu'u Beach (Yes "Over Beach"): Approved

o Kailua Beach (Yes "Over Beach"): Approved

o Keehi Lagoon/Channels/Islands (Yes "Over Beach"): Approved

o Ala Moana (Yes "Over Beach"): Approved – DAR recommends conducting reconnaissance this area in the daytime to locate a viable route to the shoreline – very shallow water with reef flat/potential coral cover between the wave breakers and shoreline - concerns of submarine and over-beach maneuvers impacting reef habitat.

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Comments

o Makaha (Yes "Over Beach"): Approved - DAR still recommends consulting with local practitioners or hui because this may be a popular fishing area and may be used for other cultural practices.

o Heeia Boat Harbor (No "Over Beach"-using boat launch only to deploy boat/sub): Approved

o Barbers Point Harbor (No "Over Beach"-deep draft harbor): Approved

o Maunalua Bay (No "Over Beach"-using boat launch only to deploy boat/sub): Approved

o Haleiwa Boat Harbor (right side beach- beach behind Surf and Sea)(Yes "Over Beach"): Approved

o Mokuleia: Coming in channel (maybe "Silver Channel"?) (Yes "Over Beach"): Approved

Note: All harbor trainings must be approved by and coordinated with DOBOR/Harbor Masters

Apart from the approved specific areas above (portions of the originally yellow or red circled areas) and the non-circled areas in the purple polygons in the first set of comments (submitted on 6/18/2019-attached at end), DAR requests no training activities be conducted in areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) - as indicated by circles - including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers) in order to avoid displacement of these user groups or the aquatic resources they may be utilizing. DAR requests the Navy consult with local fishing groups or hui' s or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. Select areas on each island (circled in YELLOW in maps at end of the comments in Appendix 1) may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). Some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions. DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division Cetacean Research Program, and Protected Species Division Marine Turtle Biology and Assessment Program) to determine the overlap of proposed training areas where protected cetaceans, monk seals and sea turtles may congregate, rest, feed, socialize, bask, take refuge shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in near shore

DAR# 5935-A

Comments

beaches.

DAR requests that the Navy consult with State of Hawaii Division of Forestry and Wildlife (DOFAW/DLNR) or the US Fish and Wildlife Service (USFWS) to determine the overlap of protected sea birds may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in nearshore waters or on beaches. Entanglement Prevention. Efforts will be made by the Navy to utilize best management practices to eliminate any potential for entanglement of marine organisms. Entanglement prevention practices will include but are not limited to: ensuring that any ropes or lines for buoys or anchors remain taut with no slack at all time. Eliminating any structures or components that may potentially cause entanglement in any training equipment. Attending any structures or components that may potentially cause entanglement at all times and removing any training gear or structures from the marine environment or shoreline after use (e.g. do not leave training gear or structures overnight unattended). The Navy will immediately notify DAR and the federal appropriate agency to report the entanglement of any protected species if incidental entanglement occurs.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 (in addition to any other measures necessary) to avoid any potential damage to coral or live rock, including reconnaissance to identify or map out aquatic resources (e.g. shallow water coral or live rock) that could potentially come into contact with the boats, jet skis, submersibles, ROVs, UUV's, divers, gear or tools lowered to the sea floor, or any other objects used in the trainings). Reconnaissance should determine viable navigable routes that would avoid contact with these coral and live rock resources during the trainings.

Under section § 13-95-70 Stony corals and § 13-95-71 Live Rock (Hawaii Administrative Rules) it is unlawful for any person to take, break, or damage any stony coral or live rock except for inadvertent breakage, damage, or displacement of an aggregate area of less than one half square meter of coral or less than one square meter of live rock if caused by: (1) A vessel with a single anchor damage incident, in an area where anchoring is not otherwise prohibited, and not more frequently than once per year; or (2) Accidental physical contact by an individual person.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity (in addition to any other measures necessary), to avoid any potential

DAR# 5935-A

Comments

damage or incidental takes to protected species (e.g. monk seals, sea turtles, cetaceans). DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division Cetacean Research Program, and Protected Species Division Marine Turtle Biology and Assessment Program) to determine if any other BMPs should be implemented during training activities to avoid damage or interactions with protected species. Please see attached maps and associated information for DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) circled in RED in maps at end of comments in Appendix 1 and select areas on each island that may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), circled in YELLOW in maps at end of the comments in Appendix 1, including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui' s or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. As stated above some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

Thank you for providing DAR the opportunity to review and comment on the Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.



STATE OF HAWAII
 DEPARTMENT OF LAND AND NATURAL RESOURCES
 DIVISION OF AQUATIC RESOURCES
 1151 PUNCHBOWL STREET, ROOM 330
 HONOLULU, HAWAII 96813

Date: 6/18/2019
 DAR # 5935

SUZANNE D. CASE
 CHAIRPERSON
 BOARD OF LAND AND NATURAL RESOURCES
 COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
 FIRST DEPUTY

M. KALEO MANUEL
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 KAHOOHAWE ISLAND RESERVE COMMISSION
 LAND
 STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
 DAR Administrator

FROM: Catherine Gewecke, Aquatic Biologist

SUBJECT: Hawaii CZM Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii

Request Submitted by: Hawaii Coastal Zone Management Program

Location of Project: State of Hawaii (Hawaii Island, Oahu, Maui, Molokai, Lanai and Kauai)


Brief Description of Project:

The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Comments:

No Comments Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved:  Date: 6/19/19
 Brian J. Neilson
 Acting DAR Administrator

DAR# 5935

Brief Description of Project

The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Water-based training activities would use existing federal and non-federal boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. A ship launch may also occur during training activities in locations that are not served by an existing boat ramp (specific offshore locations of Oahu, Maui, the Island of Hawaii, Kauai, Lanai, and Molokai) or if weather or tidal conditions result in a safety concern regarding a boat ramp launch.

The categories of water-based activities that are analyzed in this document are:

- Diver/Swimmer Training Activities - During diver/swimmer training events, trainees would swim or dive to an objective area (e.g., harbor, beach, moored vessel) for up to six hours. During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location to the support staff. Rubber replica weapons could be carried by trainees to reproduce the bulk and weight of the gear the trainee would carry during an actual mission. Depths for this activity range up to 28 feet (ft) (8.5 meters [m]).
- Insertion and Extraction Training Activities - During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include UUV and ROVs, or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training. Rubber replicate weapons could be carried by trainees to imitate real world events. In three military areas (Puuloa Range Training Facility, JBPHH Pearl City Peninsula, and Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility), actual weapons could be carried by trainees to existing live-fire training ranges. Depths for this activity can vary.

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- **Launch and Recovery Training Activities-** During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge. Vessels such as small ships, jet skis, or small boats may be used in conjunction with training systems during certain training scenarios, and for safety and training support.
- **Unmanned Underwater Vehicle (UUV) Activities-** A subset of water-based training would involve the use of a UUV and, on occasion, a remotely operation vehicle (ROV) (herein both described as UUVs). A UUV is a small, battery-powered, unmanned submersible that is hand-launched from a host vessel and used to conduct bathymetric, oceanographic, and other geographic underwater surveys. The UUVs operate within the water column and would not be set on the floor of the ocean. UUVs operate under the same navigational rules as any water vessel and would be operated to avoid other vessels. Training activities requiring a UUV would occur concurrently approximately 30 percent of the time when diver/swimmer training activities are taking place. The launching and recovery of the UUV would be conducted in water areas only and consist of launching and recovering up to two UUVs per training event. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. Underwater areas to be surveyed by the UUV are pre-programmed into the vehicles' navigation system prior to launch. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recovered at any point along the pre-programmed track. Depths for this activity range up to 328 ft (100 m).
- **Beach Landings/Over the Beach (as part of water-based activities) -** Some water-based activities may include a beach landing for the trainee or watercraft (e.g., diver/swimmer, launch and recovery training activities). During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective.
- **Landing/Drop Zone (as part of air-based activities) -** Naval special operations personnel would utilize existing and new water-based drop zones within JBPHH and MCBH property to conduct air-based training activities. Water-based drop zone training activities would be conducted at sites where up to 40 trainees land after parachuting from fixed-wing aircraft at an altitude between 5,000 - 1,500 feet above ground level (AGL). Water-based drop zones may also

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be utilized for training activities where helicopters or MV-22 aircraft approach the water surface (approximately 15 ft. AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 ft. AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area (on land or over water), trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- o Include up to 6 hours of aircraft operation per training event
- o Utilize AC-130, C-17 and MV-22 aircraft to support training with parachutes
- o Utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation over land or water
- o Hover for approximately 15 minutes when facilitating drop zone training activities
- o Coordinate use of airspace with Federal Aviation Administration Honolulu Control Facility as far in advance as possible

While training activities and events are carefully planned out, unexpected situations may occur and the Navy has planned for such contingencies. Signaling devices, such as marine flare signals, marine smoke signals, and audible recall signals are only for emergency use in accordance with naval special operations standard operating procedures established by the Navy. Navy-owned Wave Runners jet skis are used for swimmer safety and rapid response in certain events during training.

2.2 Location

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the Main Hawaiian Islands (MHI) (Figure 2-1).

The training study area includes five regions on Oahu (Figure 2-2): (1) Joint Base Pearl Harbor-Hickam (Figure 2-3), (2) South (Figure 2-4), (3) Windward (Figure 2-5), (4) North (Figure 2-6), and (5) West Oahu (Figure 2-7). The training study area also includes sites on or near the Island of Hawaii (Figure 2-8), Kauai (Figure 2-9), Maui (Figure 2-10), Lanai (Figure 2-11), and Molokai (Figure 2-12). Training activities would occur on federal and non-federal property, pending appropriate approvals. Training locations will vary due to seasonal weather

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conditions, public presence at sites, protected natural resources considerations, training qualifications to be satisfied, and training requirements. If a particular non-federal site is selected for a potential training event, communication with individual public property managers and private property owners would be conducted to establish or confirm real estate agreements to allow for training activities to be conducted.

The proposed training would take place in selected coastal nearshore waters throughout the State of Hawaii. Personnel will be familiar with locations prior to training at those locations, because reconnaissance visits to a location will be conducted prior to attempting to train in a realistic scenario. Navy divers are trained to make detailed observations about locations during reconnaissance, therefore diving personnel will be able to plan how to avoid and minimize effects to the marine environment at each location prior to training instead of responding or making decisions at the time of training without prior knowledge.

A series of best management practices (BMPs) will be applied during the proposed action. The BMPs are divided into two parts (A and B) and are outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity. Part A includes BMPs directed at minimizing effects from the training on protected species. Part B includes BMPs that minimize effects from the training on the environment (including EFH). BMPs will be incorporated into the training scenario and training events, and all trainees and support personnel will be fully briefed on the BMPs and the requirement to adhere to them during the training.

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DAR requests no training activities be conducted in DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) including the following areas on each island (circled in RED in maps at end of comments in Appendix 1):

Hawaii island: West Hawaii Regional Fishing Management Area (WHRFMA)
Oahu: Pupukea Marine Life Conservation District (MLCD)
Molokai: Kaunakakai Harbor Fisheries Management Area (FMA)
Lanai: Manele-Hulopoe Marine Life Conservation District (MLCD)
Maui: n/a - No DAR managed area within proposed training area
Kauai: n/a - No DAR managed area within proposed training area

A dynamic ArcGIS Online map of DAR marine managed areas can be referenced here:
<http://hstategis.maps.arcgis.com/apps/webappviewer/index.html?id=c0dc296ff373486baa9e041e40f445b2>

Static maps of DAR marine managed areas can be referenced here:
<http://dlnr.hawaii.gov/dar/fishing/fishing-regulations/regulated-areas/>

DAR requests no training activities be conducted in areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers) in order to avoid displacement of these user groups or the aquatic resources they may be utilizing. DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. Select areas on each island (circled in YELLOW in maps at end of the comments in Appendix 1) may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). Some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division / Cetacean Research Program, and Protected Species Division / Marine Turtle Biology and Assessment Program) to determine the overlap of proposed training areas where protected cetaceans, monk seals and sea turtles may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in near shore waters or on beaches.

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Comments

DAR requests that the Navy consult with State of Hawaii Division of Forestry and Wildlife (DOFAW/DLNR) or the US Fish and Wildlife Service (USFWS) to determine the overlap of proposed training areas where protected sea birds may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in nearshore waters or on beaches.

Entanglement Prevention. Efforts will be made by the Navy to utilize best management practices to eliminate any potential for entanglement of marine organisms. Entanglement prevention practices will include but are not limited to: ensuring that any ropes or lines for buoys or anchors remain taut with no slack at all time. Eliminating any structures or components that may potentially cause entanglement in any training equipment. Attending any structures or components that may potentially cause entanglement at all times and removing any training gear or structures from the marine environment or shoreline after use (e.g. do not leave training gear or structures over night unattended). The Navy will immediately notify DAR and the federal appropriate agency to report the entanglement of any protected species if incidental entanglement occurs.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 (in addition to any other measures necessary) to avoid any potential damage to coral or live rock, including reconnaissance to identify or map out aquatic resources (e.g. shallow water coral or live rock) that could potentially come into contact with the boats, jet skis, submersibles, ROVs, UUV's, divers, gear or tools lowered to the sea floor, or any other objects used in the trainings). Reconnaissance should determine viable navigable routes that would avoid contact with these coral and live rock resources during the trainings.

Under section §13-95-70 Stony corals and §13-95-71 Live Rock (Hawaii Administrative Rules) it is unlawful for any person to take, break, or damage any stony coral or live rock except for inadvertent breakage, damage, or displacement of an aggregate area of less than one half square meter of coral or less than one square meter of live rock if caused by:

- (1) A vessel with a single anchor damage incident, in an area where anchoring is not otherwise prohibited, and not more frequently than once per year; or
- (2) Accidental physical contact by an individual person.

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In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity (in addition to any other measures necessary), to avoid any potential damage or incidental takes to protected species (e.g. monk seals, sea turtles, cetaceans). DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division / Cetacean Research Program, and Protected Species Division / Marine Turtle Biology and Assessment Program) to determine if any other BMPs should be implemented during training activities to avoid damage or interactions with protected species.

Please see attached maps and associated information for DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) circled in RED in maps at end of comments in Appendix 1 and select areas on each island that may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), circled in YELLOW in maps at end of the comments in Appendix 1, including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. As stated above some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

Thank you for providing DAR the opportunity to review and comment on the Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.

Appendix 1. Maps and Comments

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Figure 2-2- Overall Oahu Island Training Study Area

Figure 2-2. Proposed areas for Training and Testing on Oahu. Please reference maps below to see **A)** Areas in which DAR requests no training be conducted (**RED** circles) due to aquatic resource management efforts (DAR marine managed areas including MLCDs, FMA, FRA, etc.) and **B)** Areas in which DAR requests no training be conducted (**YELLOW** circles) due to user conflict (fishers, divers, surfers, swimmers, residents, etc.). **If activity is necessary to conduct in B) Areas that may have user conflict, DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity.**

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Figure 2-3: Oahu Joint Base Pearl Harbor-Hickam Training Study Area

Figure 2-3. Oahu Joint Base Pearl Harbor-Hickam. Concern with conducting training operations in Joint Base Pearl Harbor-Hickam is low, however fishers may utilize the various shorelines in this area so it is recommended to consult with any fisher groups or hui's that may be able to provide input on areas that may be affected less than others by the training. In addition, DAR requests that the Navy consult with Oahu Waterkeeper to identify the location of multiple oyster cages that were recently deployed in the Spring of 2019 for a water bio-remediation project. The oysters in these cages require various amounts of funding, time and effort to outplant for restoration and may present a navigational or swimming hazard.

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Figure 2-4: South Oahu Region Training Study Area

Figure 2-4. South Oahu. DAR requests no training activities be conducted from Kaka’ako to Magic Island, Maunaloa Bay, Iroquoise Point to Barbers Point beach just south of Barbers Point Boat Harbor (boat ramp is used for fishing) in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers).

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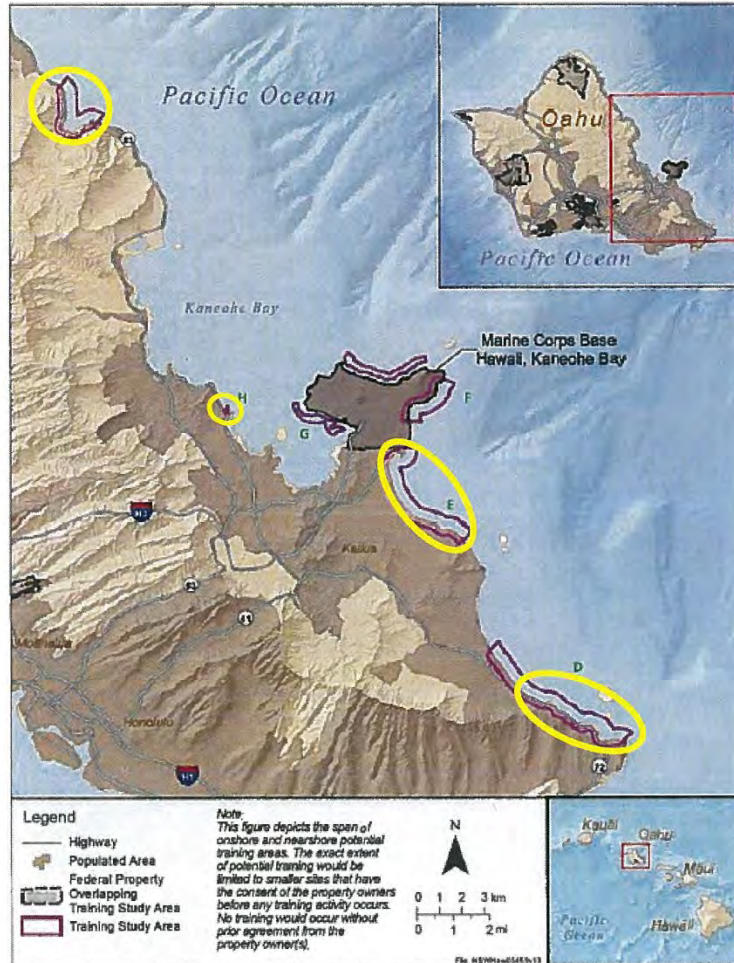
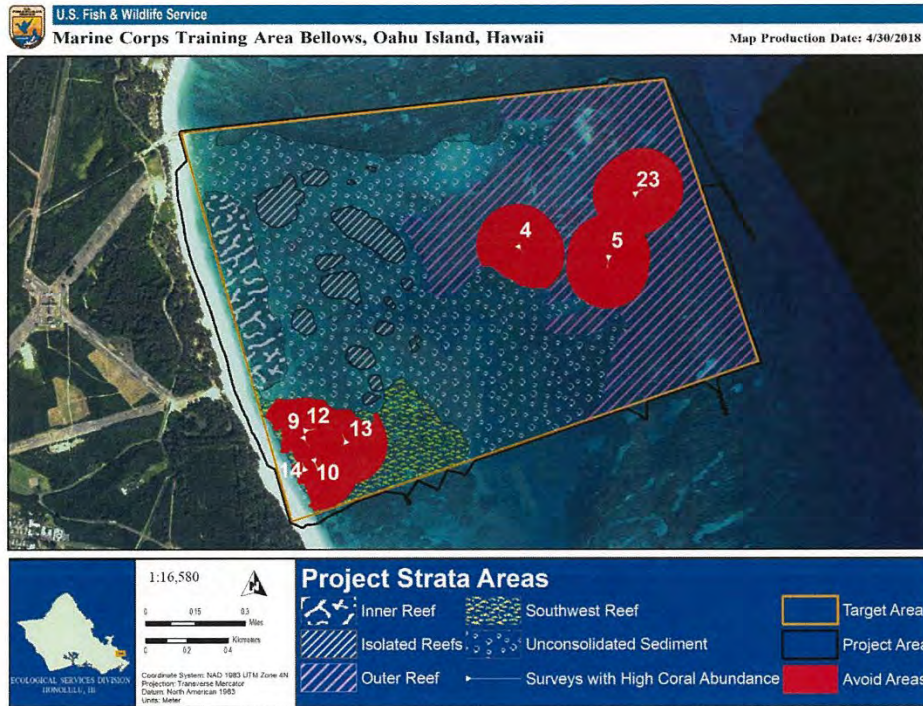


Figure 2-5: Windward Oahu Region Training Study Area

Figure 2-5. Windward Oahu Region (Waimanalo, Bellows, Kailua): DAR recommends Kaneohe Marine Corps Base Hawaii (KMCBH) and Bellows beach as the training areas. DAR requests no training activities be conducted in Waimanalo, Kailua, Kaneohe Bay by Kahalu'u or Kahana, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers).



Note on Bellows Beach:

Efforts will be made by permittee and authorized assistants to ensure that the training is conducted in such a manner as the process does not result in any additional harm to surrounding organisms or environment. The above map indicates where areas with high coral abundance are located, and should be avoided in the Bellows area. Other recommendations for this area are located in the Final Planning Aid Report (Fish & Wildlife Coordination Act): Marine Habitat Characterization Marine Corps Training Area Bellows (Oahu Island, Hawaii) on pages 233-238.

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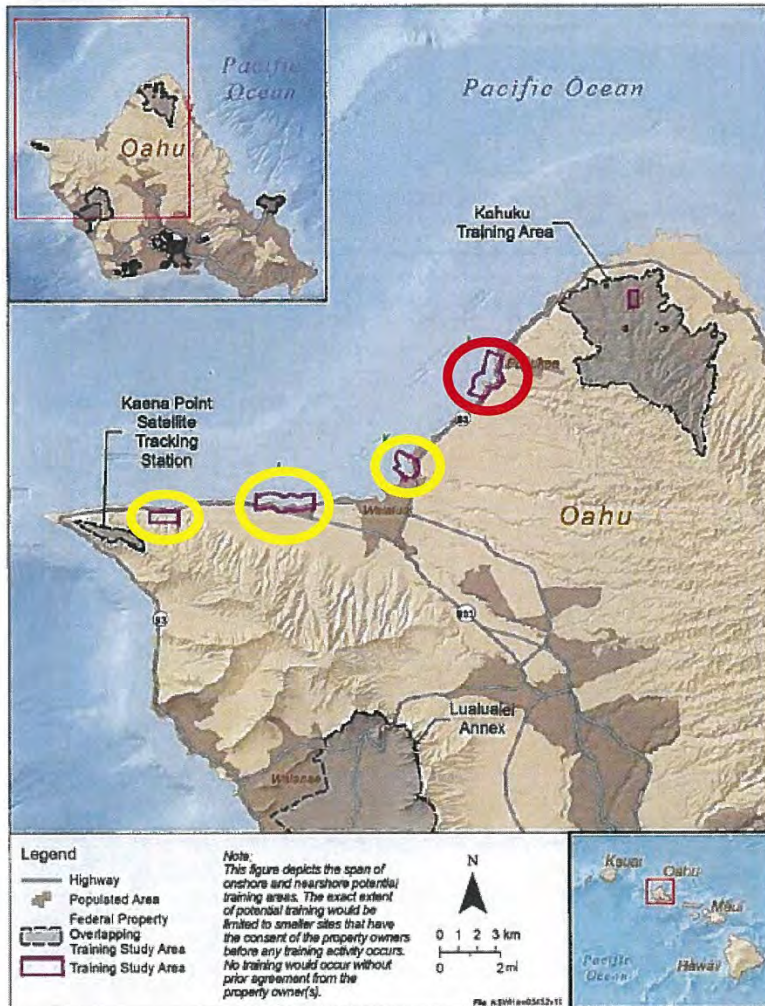


Figure 2-6: North Oahu Region Training Study Area

Figure 2-6. North Oahu. DAR requests no training activity be conducted in this area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as Pūpūkea MLCD (red circle) is one of the proposed areas and the rest of the areas proposed (yellow circles) consist of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers).

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Figure 2-7: West Oahu Region Training Study Area

Figure 2-7. West Oahu. DAR requests no training activities be conducted from north of Ko’olina to Kea’au and potentially Yokohama Bay and Makua Beach, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers). Navy should consult with State of Hawaii Division of State Parks and local fishing groups or hui’s or cultural practitioners for potential activity in Makua area.

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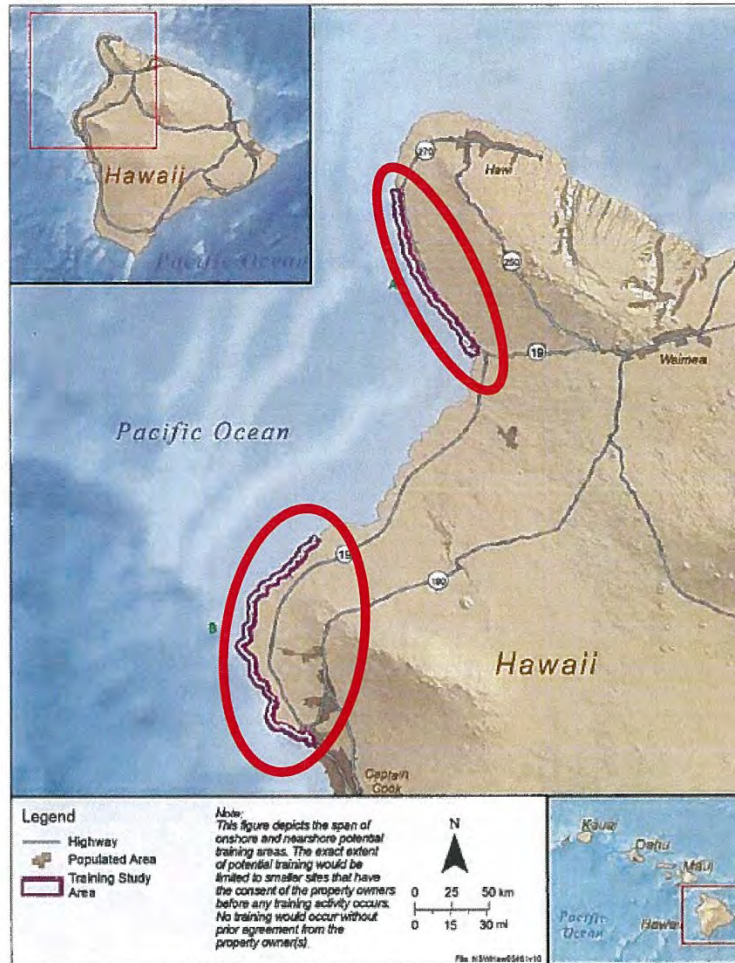


Figure 2-8: Island of Hawaii Training Study Area

Figure 2-8. Island of Hawaii. DAR requests no training activity be conducted in this area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the entire west shoreline of West Hawaii is part of the West Hawaii Regional Fishing Management Area and also consists of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers).

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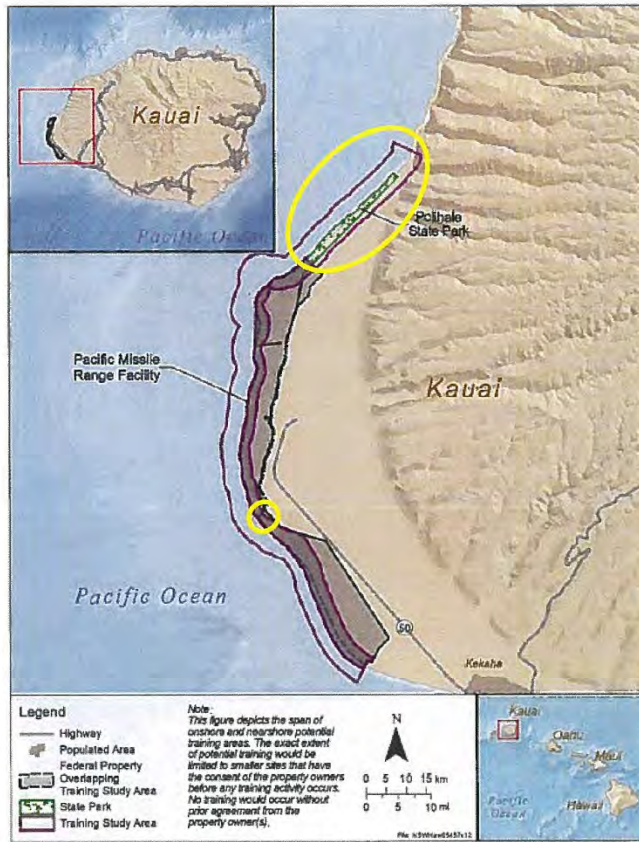


Figure 2-9. Kauai. Low Concern with conducting training operations in most of this area, however Navy should consult with NOAA Protected Species Division to determine areas that may have frequent pupping or resting monk seals in the Barking Sands area. Majors Bay (small yellow circle within Barking Sands area) is also popular surf spot that may have surfer interaction. DAR requests no training activities be conducted along Polihale State Park, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers). The Navy should consult with State of Hawaii Division of State Parks if activity is necessary in Polihale State Park.

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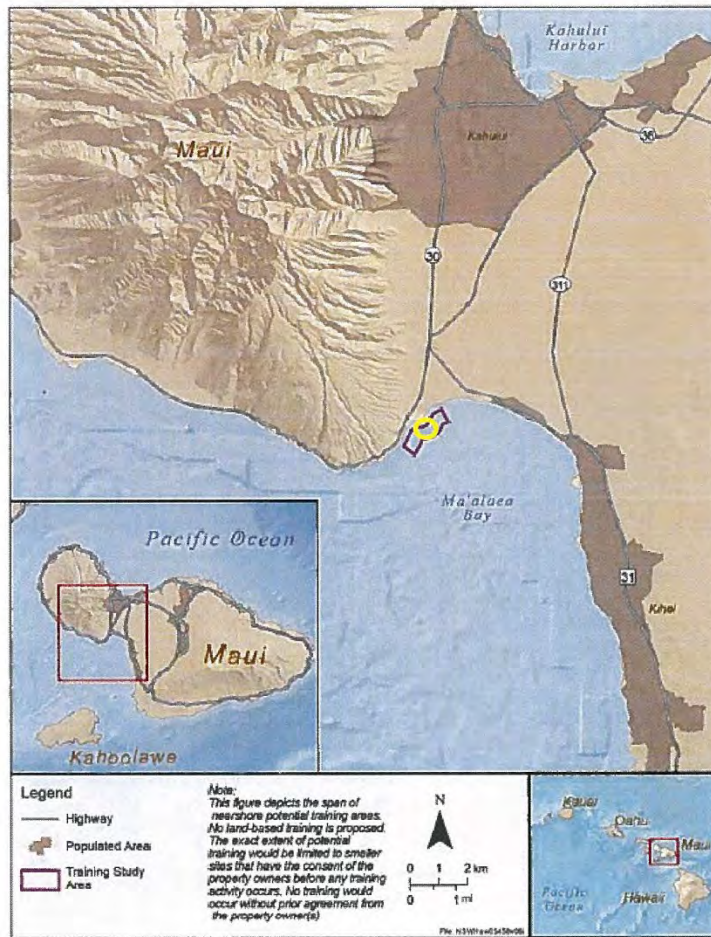


Figure 2-10: Maui Training Study Area

Figure 2-10. Maui Training Study Area. Low Concern with conducting training operations in this area, but DAR recommends that Ma'alaea Boat Harbor be avoided due user conflict (boaters, fishers, etc.). This area is busy with frequent boat traffic from Maui to Molokini, for whale watching, fishing, eco-tourism etc.

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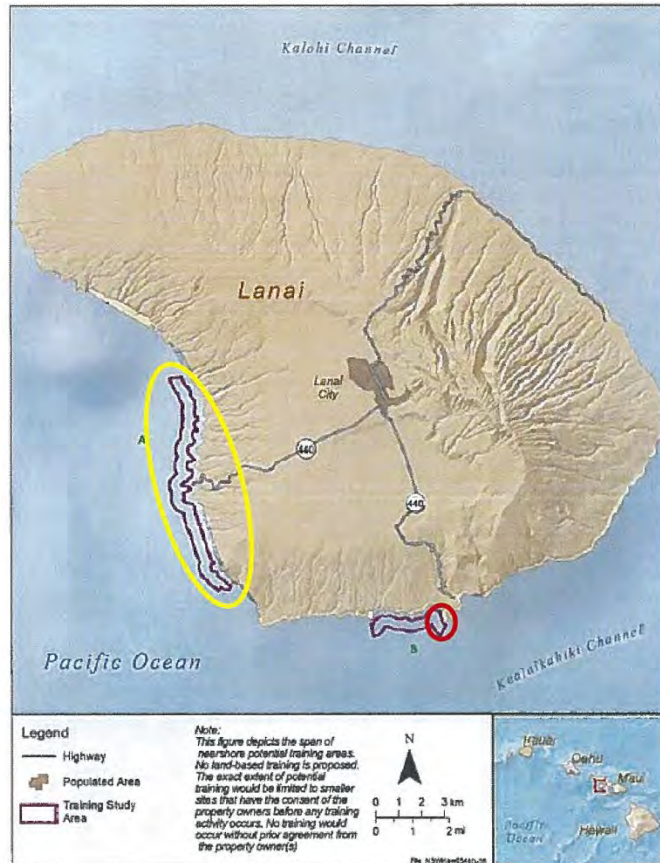


Figure 2-11: Lanai Training Study Area

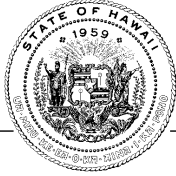
Figure 2-11. Lanai. DAR requests no training activity be conducted in the red outlined area (Manele-Hulopoe Marine Life Conservation District) as this a DAR marine managed area and is also busy with boat traffic. In addition, DAR requests no training activity be conducted in the yellow outlined area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the east shoreline of Lanai may consist of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners, that may be located in each area, for approval and avoid areas that may have high subsistence fishing activity if *any* activity is to be conducted on Lanai. In addition, the Navy should consult with Larry Ellison for conducting operation specific to Lanai.

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Figure 2-12. Molokai. DAR requests no training activity be conducted in the red outlined area (Kaunakekai Boat Harbor) as this a DAR marine managed area and is also busy with boat traffic. In addition, DAR requests no training activity be conducted in the yellow outlined area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the entire south shoreline of Molokai consists of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui’s or cultural practitioners, that may be located in each area, for approval and avoid areas that may have high subsistence fishing activity if any activity is to be conducted on Molokai.

A.4.6 State of Hawaii, Coastal Zone Management Program Letter of Concurrence Regarding Federal Consistency Review for Naval Special Operations Training in Hawaii – Non-Federal Lands (1Jul20)**OFFICE OF PLANNING
STATE OF HAWAII**

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
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DAVID Y. IGE
GOVERNOR

MARY ALICE EVANS
DIRECTOR
OFFICE OF PLANNING

201904231053BE

July 1, 2020

Mr. Aaron Y. Poentis
Director
Regional Environmental Department
Department of the Navy
Navy Region Hawaii
850 Ticonderoga Street, Suite 110
JBPHH, Hawaii 96860-5101

Dear Mr. Poentis:

Subject: Hawaii Coastal Zone Management Program Federal Consistency Review of
Naval Special Operations Training Activities on Non-Federal Areas, State of
Hawaii

The Hawaii Coastal Zone Management (CZM) Program has completed the federal consistency review for the U.S. Naval Special Warfare Command (NSWC) proposal to conduct small-unit intermediate and advanced land and maritime training activities for naval special operations personnel on and within non-federal areas of the State of Hawaii (proposed activity). This federal consistency review covers water-based training, land-based training, and air-based training, as described and represented in the U.S. Department of the Navy's (Navy) federal consistency determination.¹ Water-based training generally includes naval special operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination. Water-based training may also incorporate inserting and extracting naval special operations personnel or equipment using watercraft as part of a training event and prior to performing a land-based training component. Land-based training includes personnel transiting over the beach on foot, simulating building clearance activities using simulated munitions, in limited areas engaging in high angle climbing, and using observation techniques in a pre-arranged scenario (special reconnaissance operations with military role players). Air-based training includes the use of unmanned aircraft systems or aircraft utilizing drop zones or landing zones for parachute or rope suspension training activities. The training activities will take place in selected coastal nearshore waters and selected shoreline

¹ U.S. Department of the Navy consistency determination dated April 15, 2019, received by Hawaii CZM Program (HCZMP) on April 23, 2020. HCZMP public notice was published in the OEQC *The Environmental Notice* on May 23, 2019, with comment period ending June 6, 2020. The federal consistency review period was extended beyond the 60-day timeframe at the Navy's request on multiple occasions; the current extension to July 21, 2020 was requested by the Navy on January 21, 2020 and agreed to by the HCZMP with a review end date of August 4, 2020.

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and inland locations throughout the State of Hawaii, as shown on maps provided in support of the consistency determination. To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the main Hawaiian Islands: nearshore waters and land-based areas on Oahu, Hawaii, and Kauai; and in nearshore waters, including harbors and bays, of Maui, Molokai, and Lanai. Only the training activities occurring on non-federal lands were evaluated in this CZM federal consistency review. Each non-federal training site would be used for up to ten events per year and not every non-federal training site will be used every year. The maximum number of events across all non-federal land training sites will be 330 events per year.

We conditionally concur with the Navy's determination that the proposed activity is consistent to the maximum extent practicable with the enforceable policies of the Hawaii CZM Program based on the following conditions.

1. The proposed activity shall be carried out as represented in the CZM federal consistency determination and all supporting materials and information provided to the Hawaii CZM Program. Any changes to the proposed activity shall be submitted to the Hawaii CZM Program for review and approval. Changes to the proposed activity may require a full CZM federal consistency review, including publication of a public notice and provision for public review and comment. This condition is necessary to ensure that the proposed activity is implemented as reviewed for consistency with the enforceable policies of the Hawaii CZM Program. Hawaii Revised Statutes (HRS) Chapter 205A Coastal Zone Management, is the federally approved enforceable policy of the Hawaii CZM Program that applies to this condition.
2. The proposed activity shall be conducted in compliance with the requirements of the State Historic Preservation Division (SHPD) concurrence of "no adverse effect to historic properties," issued May 29, 2020, for the National Historic Preservation Act Section 106. In addition, SHPD requirements resulting from the HRS Chapter 6E Historic Preservation review shall be complied with. HRS Chapter 6E is the federally approved enforceable policy of the Hawaii CZM Program that applies to this condition.
3. The proposed activity shall not obstruct or preclude public engagement in or access to ocean recreation in/on non-federal areas. This condition is necessary to ensure consistency with the recreational resource policies contained in HRS Chapter 205A Coastal Zone Management, which is the federally approved enforceable policy that applies to this condition.
4. The proposed activity shall be conducted in compliance with the State Department of Land and Natural Resources (DLNR), Division of Aquatic Resources (DAR)

Mr. Aaron Y. Poentis
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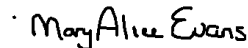
recommendations of September 24, 2019, that were agreed to by the Navy as transmitted and indicated in the June 18, 2020 letter to the Office of Planning. The enclosed table of the CZM conditions and applicable enforceable policies identify the site/location specific conditions.

In addition, although not included as a condition of this consistency concurrence, the Hawaii CZM Program is transmitting for your consideration, the recommendations made by the DAR in its comment memo dated June 29, 2020 (enclosed).

If the requirements for conditional concurrences specified in 15 CFR § 930.4 (a), (1) through (3), are not met, then all parties shall treat this conditional concurrence letter as an objection pursuant to 15 CFR Part 930, subpart C.

This CZM consistency conditional concurrence does not represent an endorsement of the proposed activity nor does it convey approval with any regulations administered by any state or county agency. Thank you for your cooperation in complying with the Hawaii CZM Program. If you have any questions, please call John Nakagawa of our CZM Program at (808) 587-2878.

Sincerely,



Mary Alice Evans
Director

Enclosures

cc: Parrent Margherita, NSWC (by email)
John Bigay, NAVFAC, Pacific (by email)
Stephanie Hacker, SHPD (by email)
Brian Neilson, DAR (by email)
Catherine Gewecke, DAR (by email)

CZM Federal Consistency Review Condition No. 4		
<i>Location</i>	<i>CZM Condition</i>	<i>CZM Enforceable Policies</i>
Hawaii Island		
Kawaihae Harbor	Training activity at this site will be limited to launch and recovery at the boat ramp, and the outer harbor. No training activity shall be conducted within the inside Fishery Management Area (FMA) portion, no over-the-beach training shall be conducted. NSWC will coordinate with the State DLNR, Division of Boating and Ocean Recreation, as well as the Harbor Master, prior to use.	HRS 187A Aquatic Resources HAR 13-55 Marine Fisheries Management Areas - Kawaihae Harbor, Hawaii HRS 200 Ocean Recreation and Coastal Areas Programs HAR 13-230 Small Boat Facilities and Provisions Generally Applicable to All State Navigable Waters - General Provisions HAR 13-231 Operation of Boats, Small Boat Harbors, and Use Permits for All Navigable Waters
Kaloko-Honokohau Fish Replenishment Area/Net Restricted Area (FRA/NRA)	This FRA/NRA is located immediately offshore of the Kaloko-Honokohau National Historical Park (NHP). Per NSWC coordination with the National Park Service, training will not be conducted within the NHP or adjacent waters. Therefore, training will not be conducted within the Kaloko-Honokohau FRA/NRA. No over-the-beach training shall be conducted at this site, unless subsequently approved by DAR. Hawaii CZM Program shall be notified by the Navy if DAR approves training use.	HRS 187A Aquatic Resources HAR 13-60 4 Marine Fisheries Management Areas - West Hawaii Regional Fishery Management Area, Hawaii
Puukohola Heiau National Historic Park	No training is proposed at this site.	
Lapakahi State Historical Park	No training is proposed at this site.	
Kauai		
Polihihale State Park	Over-the-beach training may be conducted at this site. Subject to approval by DLNR, Division of State Parks.	HRS 184 State Parks and Recreation Areas HAR 13-146 Hawaii State Park System
Lanai		
Manele-Hulopoe Marine Life Conservation District (MLCD) - Hulopoe Bay Side	No over-the-beach training shall be conducted at this site. Insertion and Extraction training activities will be conducted outside of the MLCD. Submersibles/zodiac-type craft/jet-skis are not allowed inside the MLCD - Hulopoe Bay Side and will be left at the outer MLCD boundary; scuba may be used.	HRS 190 Marine Life Conservation Program HAR 13-30 Manele-Hulopoe Marine Life Conservation District, Lanai
Kaumalapau Harbor	No over-the-beach training shall be conducted at this site; no use of zodiac-type craft.	HRS 187A Aquatic Resources
Maui		
Maalaea Boat Harbor	No over-the-beach training shall be conducted at this site.	HRS 187A Aquatic Resources HRS 200 Ocean Recreation and Coastal Areas Programs

		HAR 13-230 Small Boat Facilities and Provisions Generally Applicable to All State Navigable Waters - General Provisions HAR 13-231 Operation of Boats, Small Boat Harbors, and Use Permits for All Navigable Waters
Molokai		
Kaunakakai Harbor Fisheries Management Area (FMA)	No over-the-beach training shall be conducted at this site; no use of zodiac-type craft.	HRS 187A Aquatic Resources HAR 13-56 Marine Fisheries Management Areas - Kaunakakai Harbor, Molokai
Hale o Lono Harbor	No over-the-beach training shall be conducted at this site; no use of zodiac-type craft.	HRS 187A Aquatic Resources
Oahu		
Pupukea MLCD - Waimea Bay side	Insertion and Extraction training activities to outside of the MLCD. Submersibles/zodiac-type craft/jet-skis are not allowed inside the MLCD - Waimea Bay side; all vessels/crafts shall be left at the outer MLCD boundary. Over-the-beach training may be conducted at this site; scuba may be used.	HRS 190 Marine Life Conservation Program HAR 13-34 Pupukea Marine Life Conservation District, Oahu
Ahupua'a 'O Kahana State Park and Bay	Over-the-beach training may be conducted at this site. Prior to conducting training activities the DLNR Division of State Parks shall be notified.	HRS 187A Aquatic Resources HRS 171 Conservation and Resources HRS 184 State Parks and Recreation Areas HAR 13-146 Hawaii State Park System
Makipuu Beach	Over-the-beach training may be conducted at this site.	HRS 187A Aquatic Resources
Kailua Beach	Over-the-beach training may be conducted at this site.	HRS 187A Aquatic Resources
Keolu Lagoon/Channels/Islands	Over-the-beach training may be conducted at this site.	HRS 187A Aquatic Resources
Ala Moana Regional Park	Over-the-beach training will be conducted at this site. Conduct reconnaissance prior to all training events to ensure a viable route to the shoreline avoiding reef flat and coral cover areas.	HRS 187A Aquatic Resources
Makaha Beach	Over-the-beach training may be conducted at this site.	HRS 187A Aquatic Resources
Heeia Kea Small Boat Harbor	Limited to using only boat launch to deploy boats/submersibles.	HRS 187A Aquatic Resources HRS 200 Ocean Recreation and Coastal Areas Programs HAR 13-230 Small Boat Facilities and Provisions Generally Applicable to All State Navigable Waters - General Provisions HAR 13-231 Operation of Boats, Small Boat Harbors, and Use Permits for All Navigable Waters

Barbers Point Harbor	No over-the-beach training shall be conducted at this site - deep draft harbor.	HRS 205A Coastal Zone Management HRS 187A Aquatic Resources
Maunaloa Bay Launch Ramp Facility	No over-the-beach training shall be conducted at this site. Limited to using only boat launch to deploy boats/submersibles.	HRS 187A Aquatic Resources HRS 200 Ocean Recreation and Coastal Areas Programs HAR 13-230 Small Boat Facilities and Provisions Generally Applicable to All State Navigable Waters - General Provisions HAR 13-231 Operation of Boats, Small Boat Harbors, and Use Permits for All Navigable Waters
Haleiwa Boat Harbor	Over-the-beach training limited to using right side beach behind "Surf and Sea" shop.	HRS 187A Aquatic Resources HRS 200 Ocean Recreation and Coastal Areas Programs HAR 13-230 Small Boat Facilities and Provisions Generally Applicable to All State Navigable Waters - General Provisions HAR 13-231 Operation of Boats, Small Boat Harbors, and Use Permits for All Navigable Waters
Mokuleia Beach	Coming in through channel and over-the-beach training may be conducted at this site.	HRS 187A Aquatic Resources
State Small Boat Harbors		
	All training events directly or indirectly involving State of Hawaii small boat harbor facilities shall be coordinated with each applicable Harbor Master, DLNR, Division of Boating and Ocean Recreation.	HRS 200 Ocean Recreation and Coastal Areas Programs HAR 13-230 Small Boat Facilities and Provisions Generally Applicable to All State Navigable Waters - General Provisions HAR 13-231 Operation of Boats, Small Boat Harbors, and Use Permits for All Navigable Waters



DAVID Y. IGE
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CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Date: 6/29/2020
DAR # 5935-A

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: Catherine Gewecke, Aquatic Biologist

SUBJECT: Modifications-DAR Comments for the State of HI CZM's Fed. Consistency
Review of Naval Special Operations Training Activities on Non-Fed.
Areas, HI

Request Submitted by: Hawaii Coastal Zone Management Program

Location of Project: State of Hawaii (Hawaii Island, Oahu, Maui, Molokai, Lanai and Kauai)


Brief Description of Project:

Modifications of DAR Comments Submitted on 6/18/2019 (see original comments at end). The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Comments:

No Comments Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved:  Date: Jun 30, 2020
Brian J. Neilson
DAR Administrator

DAR# 5935-A

Brief Description of Project

Modifications of DAR Comments Submitted on 6/18/2019 (see original comments at end). The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Water-based training activities would use existing federal and non-federal boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. A ship launch may also occur during training activities in locations that are not served by an existing boat ramp (specific offshore locations of Oahu, Maui, the Island of Hawaii, Kauai, Lanai, and Molokai) or if weather or tidal conditions result in a safety concern regarding a boat ramp launch.

The categories of water-based activities that are analyzed in this document are:

- Diver/Swimmer Training Activities - During diver/swimmer training events, trainees would swim or dive to an objective area (e.g., harbor, beach, moored vessel) for up to six hours. During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location to the support staff. Rubber replica weapons could be carried by trainees to reproduce the bulk and weight of the gear the trainee would carry during an actual mission. Depths for this activity range up to 28 feet (ft) (8.5 meters [m]).
- Insertion and Extraction Training Activities - During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include UUV and ROVs, or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training. Rubber replicate weapons could be carried by trainees to imitate real world events. In three military areas (Puuloa Range Training Facility, JBPHH Pearl City Peninsula, and Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility), actual weapons could be carried by trainees to existing live-fire training ranges. Depths for this activity can vary.

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Brief Description of Project

- **Launch and Recovery Training Activities-** During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge. Vessels such as small ships, jet skis, or small boats may be used in conjunction with training systems during certain training scenarios, and for safety and training support.
- **Unmanned Underwater Vehicle (UUV) Activities-** A subset of water-based training would involve the use of a UUV and, on occasion, a remotely operation vehicle (ROV) (herein both described as UUVs). A UUV is a small, battery-powered, unmanned submersible that is hand-launched from a host vessel and used to conduct bathymetric, oceanographic, and other geographic underwater surveys. The UUVs operate within the water column and would not be set on the floor of the ocean. UUVs operate under the same navigational rules as any water vessel and would be operated to avoid other vessels. Training activities requiring a UUV would occur concurrently approximately 30 percent of the time when diver/swimmer training activities are taking place. The launching and recovery of the UUV would be conducted in water areas only and consist of launching and recovering up to two UUVs per training event. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. Underwater areas to be surveyed by the UUV are pre-programmed into the vehicles' navigation system prior to launch. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recovered at any point along the pre-programmed track. Depths for this activity range up to 328 ft (100 m).
- **Beach Landings/Over the Beach (as part of water-based activities) -** Some water-based activities may include a beach landing for the trainee or watercraft (e.g., diver/swimmer, launch and recovery training activities). During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective.
- **Landing/Drop Zone (as part of air-based activities) -** Naval special operations personnel would utilize existing and new and water-based drop zones within JBPHH and MCBH property to conduct air-based training activities. Water-based drop zone training activities would be conducted at sites where up to 40 trainees land after parachuting from fixed-wing aircraft at an

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Brief Description of Project

altitude between 5,000 - 1,500 feet above ground level (AGL). Water-based drop zones may also be utilized for training activities where helicopters or MV-22 aircraft approach the water surface (approximately 15 ft. AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 ft. AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area (on land or over water), trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- o Include up to 6 hours of aircraft operation per training event
- o Utilize AC-130, C-17 and MV-22 aircraft to support training with parachutes
- o Utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation over land or water
- o Hover for approximately 15 minutes when facilitating drop zone training activities
- o Coordinate use of airspace with Federal Aviation Administration Honolulu Control Facility as far in advance as possible

While training activities and events are carefully planned out, unexpected situations may occur and the Navy has planned for such contingencies. Signaling devices, such as marine flare signals, marine smoke signals, and audible recall signals are only for emergency use in accordance with naval special operations standard operating procedures established by the Navy. Navy-owned Wave Runners jet skis are used for swimmer safety and rapid response in certain events during training.

2.2 Location

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the Main Hawaiian Islands (MHI) (Figure 2-1).

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Brief Description of Project

The training study area includes five regions on Oahu (Figure 2-2): (1) Joint Base Pearl Harbor-Hickam (Figure 2-3), (2) South (Figure 2-4), (3) Windward (Figure 2-5), (4) North (Figure 2-6), and (5) West Oahu (Figure 2-7). The training study area also includes sites on or near the Island of Hawaii (Figure 2-8), Kauai (Figure 2-9), Maui (Figure 2-10), Lanai (Figure 2-11), and Molokai (Figure 2-12). Training activities would occur on federal and non-federal property, pending appropriate approvals. Training locations will vary due to seasonal weather conditions, public presence at sites, protected natural resources considerations, training qualifications to be satisfied, and training requirements. If a particular non-federal site is selected for a potential training event, communication with individual public property managers and private property owners would be conducted to establish or confirm real estate agreements to allow for training activities to be conducted.

The proposed training would take place in selected coastal nearshore waters throughout the State of Hawaii. Personnel will be familiar with locations prior to training at those locations, because reconnaissance visits to a location will be conducted prior to attempting to train in a realistic scenario. Navy divers are trained to make detailed observations about locations during reconnaissance, therefore diving personnel will be able to plan how to avoid and minimize effects to the marine environment at each location prior to training instead of responding or making decisions at the time of training without prior knowledge.

A series of best management practices (BMPs) will be applied during the proposed action. The BMPs are divided into two parts (A and B) and are outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity. Part A includes BMPs directed at minimizing effects from the training on protected species. Part B includes BMPs that minimize effects from the training on the environment (including EFH). BMPs will be incorporated into the training scenario and training events, and all trainees and support personnel will be fully briefed on the BMPs and the requirement to adhere to them during the training.

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Comments

Modifications of DAR Comments Submitted on 6/18/2019 for the State of Hawaii's Coastal Zone Management's Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii.

The following areas (listed below) have been either approved, conditionally approved or denied; please see determination next to each location at end of sentence. These focused locations are located within larger areas in which DAR originally requested that the proposed training activity not occur. After further evaluation of the proposed activity for each smaller location, DAR has approved certain areas. The approved locations listed below are in addition to all areas indicated as "Approved" in first set of comments (all areas in purple polygons outside of yellow or red DAR circled areas), submitted by DAR on 6/18 2019 (also attached at end of this PDF). All applicable requests, recommendations and BMPs from the first set of comments submitted by DAR still apply for the proposed training.

Maui:

o Ma'alaea Boat Harbor (No "Over Beach"): Approved

Molokai:

o Kaunakakai Harbor Fisheries Management Area (FMA)(No "Over Beach"- maybe no surface zodiacs): Approved

o Hale o Lono Harbor (No "Over Beach"- maybe no surface zodiacs): Approved - DAR still recommends consulting with local practitioners or hui because this is a popular fishing area and may be used for other practices.

Lanai:

o Manele-Hulopoe Marine Life Conservation District (MLCD - Hulopoe Bay side)(No "Over Beach"): Approved – No submarine/zodiacs/jet-skis allowed inside MLCD, leave all vessels/crafts at outer boundary-scuba ok

o Kaunapau Harbor (No "Over Beach"- maybe no surface zodiacs): Approved

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Comments

Kauai:

o Polihale State Park (Yes "Over Beach"): Approved (pending State Parks Approval)

Hawaii island:

o Kawaihae Harbor (No "Over Beach"-no activity in inside FMA portion – outer harbor only-except for using boat launch): Conditionally Approved by DAR if consultation with NPS results in approval.

o Kaloko - Honokōhau FRA/NRA (Yes "Over Beach"): DAR requests results of NPS consultation before commenting-concerns of submarine and over-beach maneuvers impacting dense coral cover-Not Approved at this time.

Oahu:

o Pupukea Marine Life Conservation District (MLCD-Waimea Bay side) (Yes "Over Beach"): Approved – No submarine/zodiacs/jet-skis allowed inside MLCD, leave all vessels/crafts at outer boundary - scuba ok. If jet skis are necessary, DAR request another location be utilized for training.

o Kahana Bay) (Yes "Over Beach"): Approved - DAR still recommends consulting with local practitioners or hui because this is a popular fishing area and may be used for other cultural practices.

o Makipu'u Beach (Yes "Over Beach"): Approved

o Kailua Beach (Yes "Over Beach"): Approved

o Keehi Lagoon/Channels/Islands (Yes "Over Beach"): Approved

o Ala Moana (Yes "Over Beach"): Approved – DAR recommends conducting reconnaissance this area in the daytime to locate a viable route to the shoreline – very shallow water with reef flat/potential coral cover between the wave breakers and shoreline - concerns of submarine and over-beach maneuvers impacting reef habitat.

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o Makaha (Yes "Over Beach"): Approved - DAR still recommends consulting with local practitioners or hui because this may be a popular fishing area and may be used for other cultural practices.

o Heeia Boat Harbor (No "Over Beach"-using boat launch only to deploy boat/sub): Approved

o Barbers Point Harbor (No "Over Beach"-deep draft harbor): Approved

o Maunalua Bay (No "Over Beach"-using boat launch only to deploy boat/sub): Approved

o Haleiwa Boat Harbor (right side beach- beach behind Surf and Sea)(Yes "Over Beach"): Approved

o Mokuleia: Coming in channel (maybe "Silver Channel"?) (Yes "Over Beach"): Approved

Note: All harbor trainings must be approved by and coordinated with DOBOR/Harbor Masters

Apart from the approved specific areas above (portions of the originally yellow or red circled areas) and the non-circled areas in the purple polygons in the first set of comments (submitted on 6/18/2019-attached at end), DAR requests no training activities be conducted in areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) - as indicated by circles - including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers) in order to avoid displacement of these user groups or the aquatic resources they may be utilizing. DAR requests the Navy consult with local fishing groups or hui' s or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. Select areas on each island (circled in YELLOW in maps at end of the comments in Appendix 1) may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). Some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions. DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division Cetacean Research Program, and Protected Species Division Marine Turtle Biology and Assessment Program) to determine the overlap of proposed training areas where protected cetaceans, monk seals and sea turtles may congregate, rest, feed, socialize, bask, take refuge shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in near shore

DAR# 5935-A

Comments

beaches.

DAR requests that the Navy consult with State of Hawaii Division of Forestry and Wildlife (DOFAW/DLNR) or the US Fish and Wildlife Service (USFWS) to determine the overlap of protected sea birds may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in nearshore waters or on beaches. Entanglement Prevention. Efforts will be made by the Navy to utilize best management practices to eliminate any potential for entanglement of marine organisms. Entanglement prevention practices will include but are not limited to: ensuring that any ropes or lines for buoys or anchors remain taut with no slack at all time. Eliminating any structures or components that may potentially cause entanglement in any training equipment. Attending any structures or components that may potentially cause entanglement at all times and removing any training gear or structures from the marine environment or shoreline after use (e.g. do not leave training gear or structures overnight unattended). The Navy will immediately notify DAR and the federal appropriate agency to report the entanglement of any protected species if incidental entanglement occurs.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 (in addition to any other measures necessary) to avoid any potential damage to coral or live rock, including reconnaissance to identify or map out aquatic resources (e.g. shallow water coral or live rock) that could potentially come into contact with the boats, jet skis, submersibles, ROVs, UUV's, divers, gear or tools lowered to the sea floor, or any other objects used in the trainings). Reconnaissance should determine viable navigable routes that would avoid contact with these coral and live rock resources during the trainings.

Under section § 13-95-70 Stony corals and § 13-95-71 Live Rock (Hawaii Administrative Rules) it is unlawful for any person to take, break, or damage any stony coral or live rock except for inadvertent breakage, damage, or displacement of an aggregate area of less than one half square meter of coral or less than one square meter of live rock if caused by: (1) A vessel with a single anchor damage incident, in an area where anchoring is not otherwise prohibited, and not more frequently than once per year; or (2) Accidental physical contact by an individual person.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity (in addition to any other measures necessary), to avoid any potential

DAR# 5935-A

Comments

damage or incidental takes to protected species (e.g. monk seals, sea turtles, cetaceans). DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division Cetacean Research Program, and Protected Species Division Marine Turtle Biology and Assessment Program) to determine if any other BMPs should be implemented during training activities to avoid damage or interactions with protected species. Please see attached maps and associated information for DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) circled in RED in maps at end of comments in Appendix 1 and select areas on each island that may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), circled in YELLOW in maps at end of the comments in Appendix 1, including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. As stated above some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

Thank you for providing DAR the opportunity to review and comment on the Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813
Date: 6/18/2019
DAR # 5935

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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: Catherine Gewecke, Aquatic Biologist

SUBJECT: Hawaii CZM Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii

Request Submitted by: Hawaii Coastal Zone Management Program

Location of Project: State of Hawaii (Hawaii Island, Oahu, Maui, Molokai, Lanai and Kauai)

Brief Description of Project:

The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Comments:

No Comments Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved: Brian J. Neilson Acting DAR Administrator Date: 6/19/19

DAR# 5935

Brief Description of Project

The Navy is proposing conduct small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Water-based training activities would use existing federal and non-federal boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. A ship launch may also occur during training activities in locations that are not served by an existing boat ramp (specific offshore locations of Oahu, Maui, the Island of Hawaii, Kauai, Lanai, and Molokai) or if weather or tidal conditions result in a safety concern regarding a boat ramp launch.

The categories of water-based activities that are analyzed in this document are:

- Diver/Swimmer Training Activities - During diver/swimmer training events, trainees would swim or dive to an objective area (e.g., harbor, beach, moored vessel) for up to six hours. During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location to the support staff. Rubber replica weapons could be carried by trainees to reproduce the bulk and weight of the gear the trainee would carry during an actual mission. Depths for this activity range up to 28 feet (ft) (8.5 meters [m]).
- Insertion and Extraction Training Activities - During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include UUV and ROVs, or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training. Rubber replicate weapons could be carried by trainees to imitate real world events. In three military areas (Puuloa Range Training Facility, JBPHH Pearl City Peninsula, and Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility), actual weapons could be carried by trainees to existing live-fire training ranges. Depths for this activity can vary.

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- **Launch and Recovery Training Activities-** During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge. Vessels such as small ships, jet skis, or small boats may be used in conjunction with training systems during certain training scenarios, and for safety and training support.
- **Unmanned Underwater Vehicle (UUV) Activities-** A subset of water-based training would involve the use of a UUV and, on occasion, a remotely operation vehicle (ROV) (herein both described as UUVs). A UUV is a small, battery-powered, unmanned submersible that is hand-launched from a host vessel and used to conduct bathymetric, oceanographic, and other geographic underwater surveys. The UUVs operate within the water column and would not be set on the floor of the ocean. UUVs operate under the same navigational rules as any water vessel and would be operated to avoid other vessels. Training activities requiring a UUV would occur concurrently approximately 30 percent of the time when diver/swimmer training activities are taking place. The launching and recovery of the UUV would be conducted in water areas only and consist of launching and recovering up to two UUVs per training event. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. Underwater areas to be surveyed by the UUV are pre-programmed into the vehicles' navigation system prior to launch. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recovered at any point along the pre-programmed track. Depths for this activity range up to 328 ft (100 m).
- **Beach Landings/Over the Beach (as part of water-based activities) -** Some water-based activities may include a beach landing for the trainee or watercraft (e.g., diver/swimmer, launch and recovery training activities). During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective.
- **Landing/Drop Zone (as part of air-based activities) -** Naval special operations personnel would utilize existing and new water-based drop zones within JBPHH and MCBH property to conduct air-based training activities. Water-based drop zone training activities would be conducted at sites where up to 40 trainees land after parachuting from fixed-wing aircraft at an altitude between 5,000 - 1,500 feet above ground level (AGL). Water-based drop zones may also

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be utilized for training activities where helicopters or MV-22 aircraft approach the water surface (approximately 15 ft. AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 ft. AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area (on land or over water), trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- o Include up to 6 hours of aircraft operation per training event
- o Utilize AC-130, C-17 and MV-22 aircraft to support training with parachutes
- o Utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation over land or water
- o Hover for approximately 15 minutes when facilitating drop zone training activities
- o Coordinate use of airspace with Federal Aviation Administration Honolulu Control Facility as far in advance as possible

While training activities and events are carefully planned out, unexpected situations may occur and the Navy has planned for such contingencies. Signaling devices, such as marine flare signals, marine smoke signals, and audible recall signals are only for emergency use in accordance with naval special operations standard operating procedures established by the Navy. Navy-owned Wave Runners jet skis are used for swimmer safety and rapid response in certain events during training.

2.2 Location

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the Main Hawaiian Islands (MHI) (Figure 2-1).

The training study area includes five regions on Oahu (Figure 2-2): (1) Joint Base Pearl Harbor-Hickam (Figure 2-3), (2) South (Figure 2-4), (3) Windward (Figure 2-5), (4) North (Figure 2-6), and (5) West Oahu (Figure 2-7). The training study area also includes sites on or near the Island of Hawaii (Figure 2-8), Kauai (Figure 2-9), Maui (Figure 2-10), Lanai (Figure 2-11), and Molokai (Figure 2-12). Training activities would occur on federal and non-federal property, pending appropriate approvals. Training locations will vary due to seasonal weather

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conditions, public presence at sites, protected natural resources considerations, training qualifications to be satisfied, and training requirements. If a particular non-federal site is selected for a potential training event, communication with individual public property managers and private property owners would be conducted to establish or confirm real estate agreements to allow for training activities to be conducted.

The proposed training would take place in selected coastal nearshore waters throughout the State of Hawaii. Personnel will be familiar with locations prior to training at those locations, because reconnaissance visits to a location will be conducted prior to attempting to train in a realistic scenario. Navy divers are trained to make detailed observations about locations during reconnaissance, therefore diving personnel will be able to plan how to avoid and minimize effects to the marine environment at each location prior to training instead of responding or making decisions at the time of training without prior knowledge.

A series of best management practices (BMPs) will be applied during the proposed action. The BMPs are divided into two parts (A and B) and are outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity. Part A includes BMPs directed at minimizing effects from the training on protected species. Part B includes BMPs that minimize effects from the training on the environment (including EFH). BMPs will be incorporated into the training scenario and training events, and all trainees and support personnel will be fully briefed on the BMPs and the requirement to adhere to them during the training.

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DAR requests no training activities be conducted in DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) including the following areas on each island (circled in RED in maps at end of comments in Appendix 1):

Hawaii island: West Hawaii Regional Fishing Management Area (WHRFMA)
Oahu: Pupukea Marine Life Conservation District (MLCD)
Molokai: Kaunakakai Harbor Fisheries Management Area (FMA)
Lanai: Manele-Hulopoe Marine Life Conservation District (MLCD)
Maui: n/a - No DAR managed area within proposed training area
Kauai: n/a - No DAR managed area within proposed training area

A dynamic ArcGIS Online map of DAR marine managed areas can be referenced here:
<http://hstategis.maps.arcgis.com/apps/webappviewer/index.html?id=c0dc296ff373486baa9e041e40f445b2>

Static maps of DAR marine managed areas can be referenced here:
<http://dlnr.hawaii.gov/dar/fishing/fishing-regulations/regulated-areas/>

DAR requests no training activities be conducted in areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers) in order to avoid displacement of these user groups or the aquatic resources they may be utilizing. DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. Select areas on each island (circled in YELLOW in maps at end of the comments in Appendix 1) may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). Some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division / Cetacean Research Program, and Protected Species Division / Marine Turtle Biology and Assessment Program) to determine the overlap of proposed training areas where protected cetaceans, monk seals and sea turtles may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in near shore waters or on beaches.

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DAR# 5935 _____

Comments

DAR requests that the Navy consult with State of Hawaii Division of Forestry and Wildlife (DOFAW/DLNR) or the US Fish and Wildlife Service (USFWS) to determine the overlap of proposed training areas where protected sea birds may congregate, rest, feed, socialize, bask, take refuge/shelter, court, mate, nest/pup, etc. or where their habitat may be impacted if disrupted by training activities in nearshore waters or on beaches.

Entanglement Prevention. Efforts will be made by the Navy to utilize best management practices to eliminate any potential for entanglement of marine organisms. Entanglement prevention practices will include but are not limited to: ensuring that any ropes or lines for buoys or anchors remain taut with no slack at all time. Eliminating any structures or components that may potentially cause entanglement in any training equipment. Attending any structures or components that may potentially cause entanglement at all times and removing any training gear or structures from the marine environment or shoreline after use (e.g. do not leave training gear or structures over night unattended). The Navy will immediately notify DAR and the federal appropriate agency to report the entanglement of any protected species if incidental entanglement occurs.

In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 (in addition to any other measures necessary) to avoid any potential damage to coral or live rock, including reconnaissance to identify or map out aquatic resources (e.g. shallow water coral or live rock) that could potentially come into contact with the boats, jet skis, submersibles, ROVs, UUV's, divers, gear or tools lowered to the sea floor, or any other objects used in the trainings). Reconnaissance should determine viable navigable routes that would avoid contact with these coral and live rock resources during the trainings.

Under section §13-95-70 Stony corals and §13-95-71 Live Rock (Hawaii Administrative Rules) it is unlawful for any person to take, break, or damage any stony coral or live rock except for inadvertent breakage, damage, or displacement of an aggregate area of less than one half square meter of coral or less than one square meter of live rock if caused by:

- (1) A vessel with a single anchor damage incident, in an area where anchoring is not otherwise prohibited, and not more frequently than once per year; or
- (2) Accidental physical contact by an individual person.

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In any area that Navy training activities are to be conducted DAR requests that the Navy implement the BMPs they have outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity (in addition to any other measures necessary), to avoid any potential damage or incidental takes to protected species (e.g. monk seals, sea turtles, cetaceans). DAR requests that the Navy consult with NOAA's Protected Resources Division (including the Protected Species Division / Cetacean Research Program, and Protected Species Division / Marine Turtle Biology and Assessment Program) to determine if any other BMPs should be implemented during training activities to avoid damage or interactions with protected species.

Please see attached maps and associated information for DAR marine managed areas (e.g. MLCD, FMA, FRA, etc.) circled in RED in maps at end of comments in Appendix 1 and select areas on each island that may have dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.), circled in YELLOW in maps at end of the comments in Appendix 1, including subsistence fishing, or other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity. As stated above some of these areas may have night versions of these activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

Thank you for providing DAR the opportunity to review and comment on the Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.

Appendix 1. Maps and Comments

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Figure 2-2- Overall Oahu Island Training Study Area

Figure 2-2. Proposed areas for Training and Testing on Oahu. Please reference maps below to see **A)** Areas in which DAR requests no training be conducted (**RED** circles) due to aquatic resource management efforts (DAR marine managed areas including MLCDs, FMA, FRA, etc.) and **B)** Areas in which DAR requests no training be conducted (**YELLOW** circles) due to user conflict (fishers, divers, surfers, swimmers, residents, etc.). **If activity is necessary to conduct in B) Areas that may have user conflict, DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners that may be located in each area and avoid areas that may have high subsistence fishing activity.**

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Figure 2-3: Oahu Joint Base Pearl Harbor-Hickam Training Study Area

Figure 2-3. Oahu Joint Base Pearl Harbor-Hickam. Concern with conducting training operations in Joint Base Pearl Harbor-Hickam is low, however fishers may utilize the various shorelines in this area so it is recommended to consult with any fisher groups or hui’s that may be able to provide input on areas that may be affected less than others by the training. In addition, DAR requests that the Navy consult with Oahu Waterkeeper to identify the location of multiple oyster cages that were recently deployed in the Spring of 2019 for a water bio-remediation project. The oysters in these cages require various amounts of funding, time and effort to outplant for restoration and may present a navigational or swimming hazard.

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Figure 2-4: South Oahu Region Training Study Area

Figure 2-4. South Oahu. DAR requests no training activities be conducted from Kaka’ako to Magic Island, Maunaloa Bay, Iroquoise Point to Barbers Point beach just south of Barbers Point Boat Harbor (boat ramp is used for fishing) in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers).

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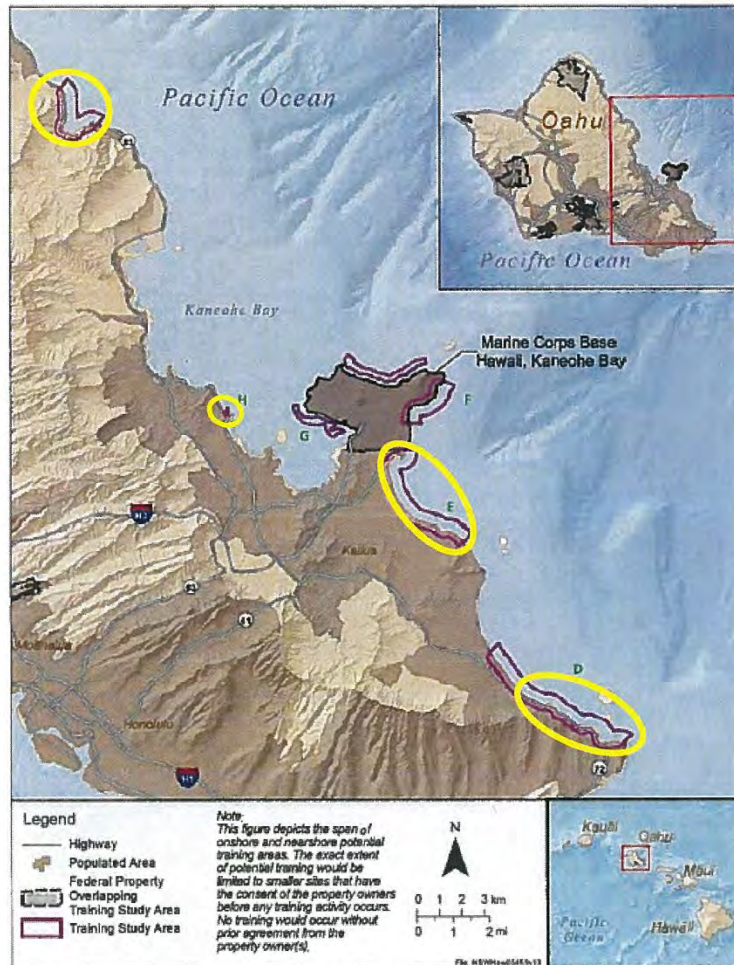
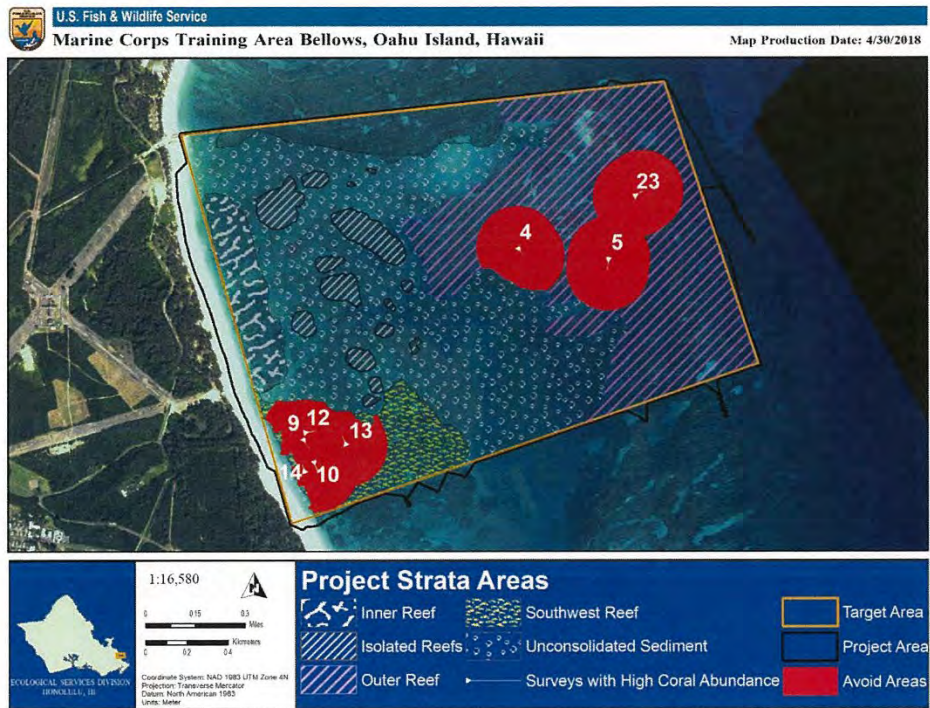


Figure 2-5: Windward Oahu Region Training Study Area

Figure 2-5. Windward Oahu Region (Waimanalo, Bellows, Kailua): DAR recommends Kaneohe Marine Corps Base Hawaii (KMCBH) and Bellows beach as the training areas. DAR requests no training activities be conducted in Waimanalo, Kailua, Kaneohe Bay by Kahalu'u or Kahana, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers).



Note on Bellows Beach:

Efforts will be made by permittee and authorized assistants to ensure that the training is conducted in such a manner as the process does not result in any additional harm to surrounding organisms or environment. The above map indicates where areas with high coral abundance are located, and should be avoided in the Bellows area. Other recommendations for this area are located in the Final Planning Aid Report (Fish & Wildlife Coordination Act): Marine Habitat Characterization Marine Corps Training Area Bellows (Oahu Island, Hawaii) on pages 233-238.

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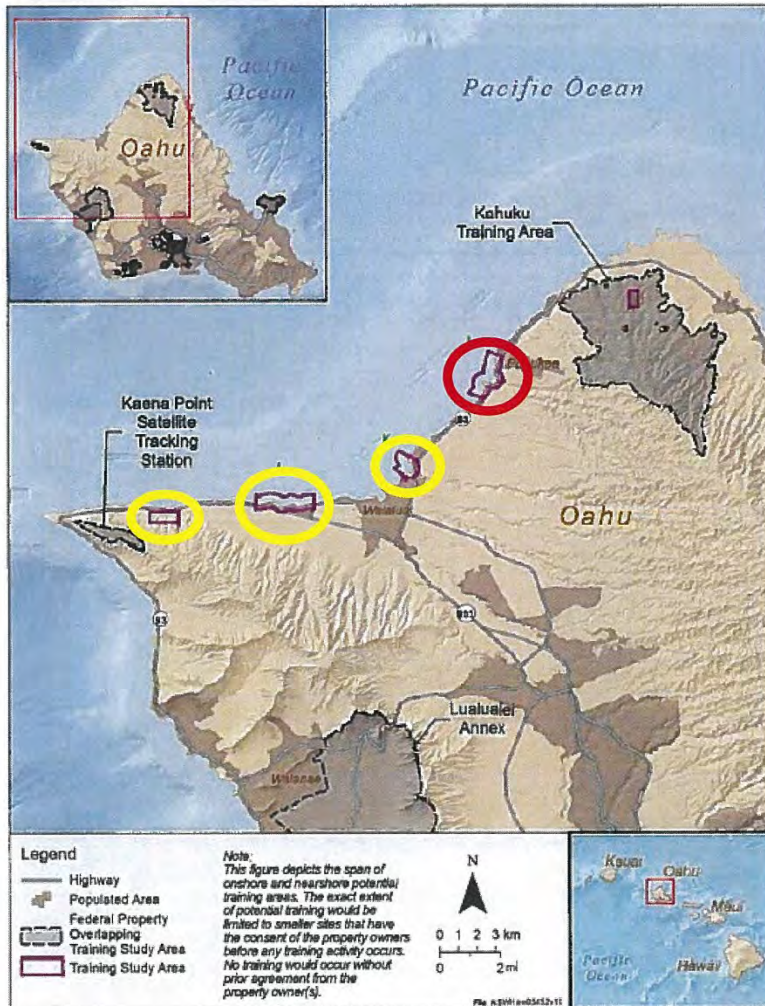


Figure 2-6: North Oahu Region Training Study Area

Figure 2-6. North Oahu. DAR requests no training activity be conducted in this area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as Pupukea MLCD (red circle) is one of the proposed areas and the rest of the areas proposed (yellow circles) consist of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers).

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Figure 2-7: West Oahu Region Training Study Area

Figure 2-7. West Oahu. DAR requests no training activities be conducted from north of Ko’olina to Kea’au and potentially Yokohama Bay and Makua Beach, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers). Navy should consult with State of Hawaii Division of State Parks and local fishing groups or hui’s or cultural practitioners for potential activity in Makua area.

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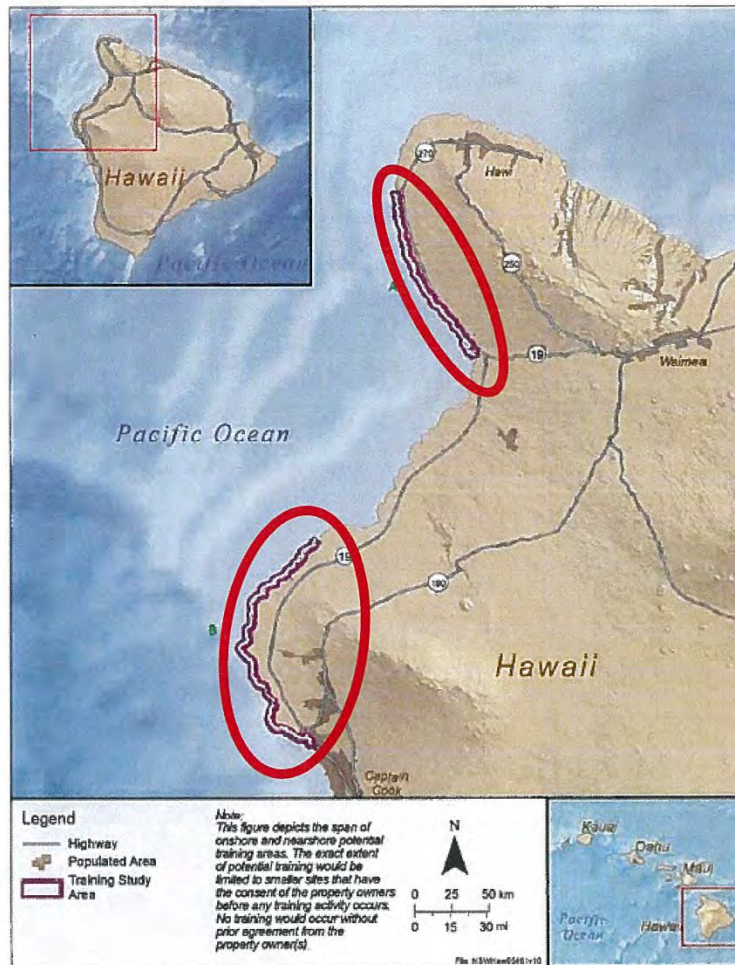


Figure 2-8: Island of Hawaii Training Study Area

Figure 2-8. Island of Hawaii. DAR requests no training activity be conducted in this area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the entire west shoreline of West Hawaii is part of the West Hawaii Regional Fishing Management Area and also consists of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers).

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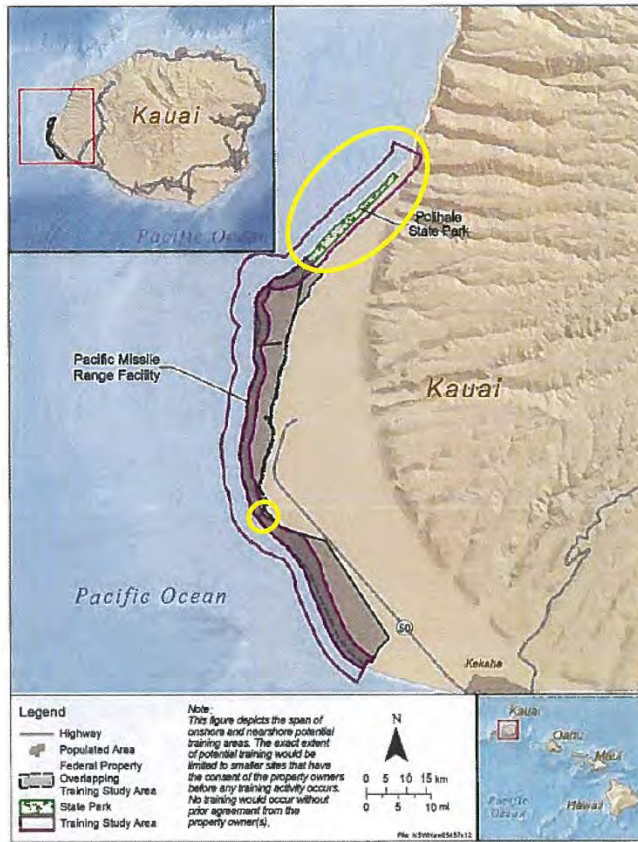


Figure 2-9- Kauai Training Study Area

Figure 2-9. Kauai. Low Concern with conducting training operations in most of this area, however Navy should consult with NOAA Protected Species Division to determine areas that may have frequent pupping or resting monk seals in the Barking Sands area. Majors Bay (small yellow circle within Barking Sands area) is also popular surf spot that may have surfer interaction. DAR requests no training activities be conducted along Polihale State Park, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as these are areas with dense fishing activity (shore fishers (day and night), spear fishers (day and night), laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers (day and night), boaters (day and night), surfers, swimmers). The Navy should consult with State of Hawaii Division of State Parks if activity is necessary in Polihale State Park.

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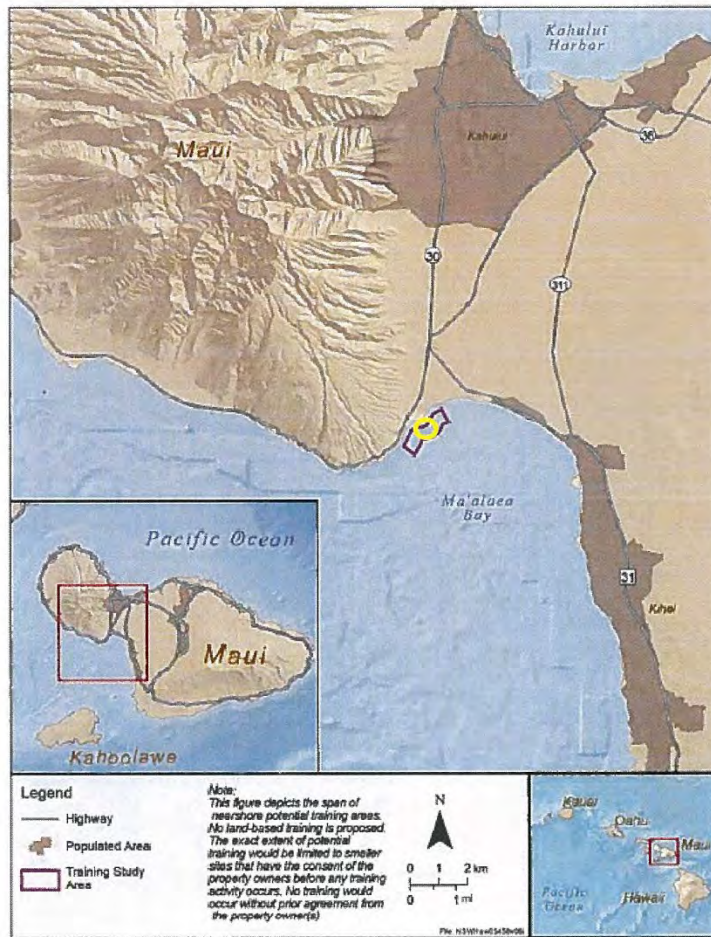


Figure 2-10: Maui Training Study Area

Figure 2-10. Maui Training Study Area. Low Concern with conducting training operations in this area, but DAR recommends that Ma'alaea Boat Harbor be avoided due user conflict (boaters, fishers, etc.). This area is busy with frequent boat traffic from Maui to Molokini, for whale watching, fishing, eco-tourism etc.

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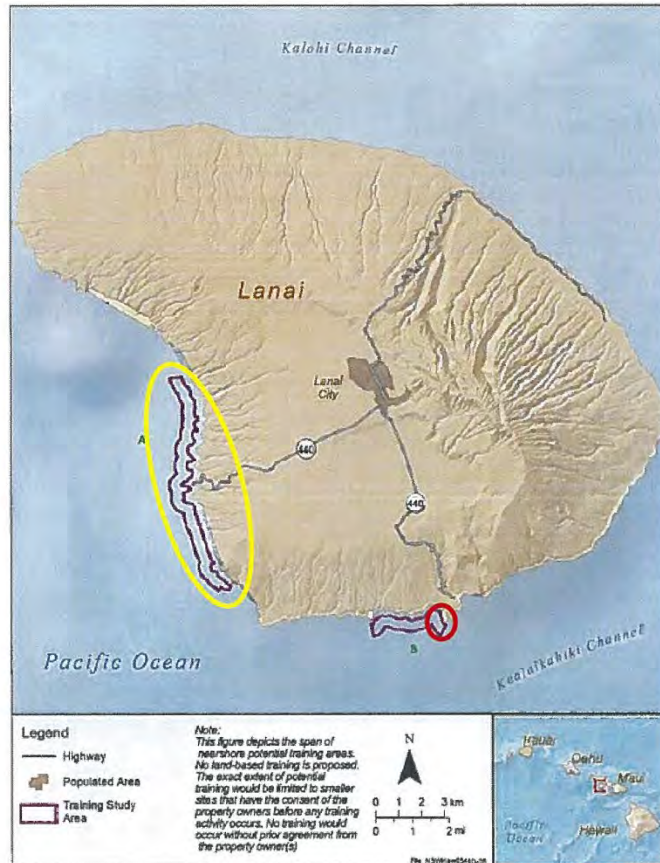


Figure 2-11: Lanai Training Study Area

Figure 2-11. Lanai. DAR requests no training activity be conducted in the red outlined area (Manele-Hulopoe Marine Life Conservation District) as this a DAR marine managed area and is also busy with boat traffic. In addition, DAR requests no training activity be conducted in the yellow outlined area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the east shoreline of Lanai may consist of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners, that may be located in each area, for approval and avoid areas that may have high subsistence fishing activity if *any* activity is to be conducted on Lanai. In addition, the Navy should consult with Larry Ellison for conducting operation specific to Lanai.

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Figure 2-12: Molokai Training Study Area

Figure 2-12. Molokai. DAR requests no training activity be conducted in the red outlined area (Kaunakekai Boat Harbor) as this a DAR marine managed area and is also busy with boat traffic. In addition, DAR requests no training activity be conducted in the yellow outlined area, in order to avoid displacement of user groups or the aquatic resources they may be utilizing, as the entire south shoreline of Molokai consists of areas with dense fishing activity (shore fishers, spear fishers, laynet or seine fishers, etc.) including subsistence fishing, and other user groups (divers, boaters, surfers, swimmers). DAR requests the Navy consult with local fishing groups or hui's or cultural practitioners, that may be located in each area, for approval and avoid areas that may have high subsistence fishing activity if any activity is to be conducted on Molokai.

A.4.7 Email from M. Parrent, Deputy Facilities Director, Naval Special Warfare Group THREE to C. Gewecke, DAR, DLNR Re: Comments for CZM Federal Consistency review - NSO Training on Non-Federal Areas, State of Hawaii (7Aug20)

From: Parrent, Margherita L CIV USSOCOM NSW (USA)
Sent: Friday, August 7, 2020 3:34 PM
To: Gewecke, Catherine A
Cc: Saboya, Adrienne V CIV USSOCOM NSW (USA); Rowland, Robert A CIV USN COMNAVREG PEARL HI (USA); Hanser, Sean F CIV USN NAVFAC PACIFIC (USA); Perez, Kaipo III CIV USN NAVFAC HAWAII PEARL (USA); Diaz, Richard LCDR USN USSOCOM NSW (USA); Bigay, John C CIV USN (USA); Spaulding, Rick; Nakagawa, John D
Subject: Meeting- DAR Room 330- Comments for CZM Federal Consistency review - NSO Training on Non-Federal Areas, State of Hawaii
Attachments:

Aloha Cathy,

Hope you are doing well, are safe, and healthy!

In my excitement in receiving the letter and reading it I may have missed a few details regarding several proposed sites for the island of Hawaii and now seek clarification.

1) Regarding the use of Mahukona Beach Park, we were proposing the ability to do diver swimmer, insertion/extraction (submersible use) and over the beach , however though we reviewed it in our follow-up meeting somehow I do not see it in the approved list. Is there a reason? I had understood it was approved per our meeting.

2) For Kawaihae Harbor you list no activity in inside FMA portion - outer harbor only-except for using boat launch): Conditionally Approved by DAR if consultation with NPS. Can you show exactly which area you are referring to when you say no activity in inside FMA portion - outer harbor only?-except for using boat launch): Next question why would there be a need to consult with NPS? Note we have removed from the EA the NPS site near Maliu Point.

Await your reply to ensure that I understand exactly what we can and cannot do where.

Thanks heaps,
Margherita

Ms. Margherita Parrent
Deputy Facilities Director
Naval Special Warfare Group THREE

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

From: Gewecke, Catherine A <catherine.a.gewecke@hawaii.gov>

Sent: Tuesday, June 30, 2020 2:01 PM

To: Parrent, Margherita L CIV USSOCOM NSW (USA)

Cc: Saboya, Adrienne V CIV USSOCOM NSW (USA); Rowland, Robert A CIV USN COMNAVREG PEARL HI (USA); Hanser, Sean F CIV USN NAVFAC PACIFIC (USA); Perez, Kaipo III CIV USN NAVFAC HAWAII PEARL (USA); Diaz, Richard LCDR USN USSOCOM NSW (USA); Bigay, John C CIV USN (USA); Spaulding, Rick; Nakagawa, John D <john.d.nakagawa@hawaii.gov>

Subject: RE: [Non-DoD Source] Meeting-DAR Room 330- Comments for CZM Federal Consistency review - Naval Special Operations Training on Non-Federal Areas, State of Hawaii

Hi Margherita and John,

Attached are the DAR comments/modifications to the original comments submitted on 6/18/2019 (see original comments at end of PDF), on the official template, approved by DAR's Administrator.

This is version 2 (V2), with the repeats/typos corrected.

The Esign process affects the formatting in the template, so some of the sentences have spaces where they shouldn't - sorry about that.

Thanks again for your patience. Please let me know if you have any questions. - Cathy

Cathy Gewecke

Aquatic Biologist - Special Activity Permits/Technical Review Division of Aquatic Resources

Department of Land and Natural Resources Kalanimoku Building

1151 Punchbowl Street, Room 330

Honolulu, HI 96813

A.4.8 Modifications (3rd Response) DAR Comments for State of Hawaii, Coastal Zone Management Federal Consistency Review for Naval Special Operations Training in Hawaii – Non-Federal Lands (11Oct20)



STATE OF HAWAII
 DEPARTMENT OF LAND AND NATURAL RESOURCES
 DIVISION OF AQUATIC RESOURCES
 1151 PUNCHBOWL STREET, ROOM 330
 HONOLULU, HAWAII 96813

Date: 10/11/2020
 DAR # 5935-B

SUZANNE D. CASE
 CHAIRPERSON
 BOARD OF LAND AND NATURAL RESOURCES
 COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
 FIRST DEPUTY

M. KALEO MANUEL
 ACTING DEPUTY DEPT. DIR. - WATER

AQUATIC RESOURCES
 BOARDS AND OCEAN PROTECTION
 BUREAU OF CONVEYANCES
 COMMISSION ON WATER RESOURCE MANAGEMENT
 CONSERVATION AND COASTAL LANDS
 CONSERVATION AND RESOURCES ENFORCEMENT
 ENGINEERING
 FORESTRY AND WILDLIFE
 HISTORIC PRESERVATION
 KAHOLAWEI ISLAND RESERVE COMMISSION
 LAND
 STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
 DAR Administrator

FROM: Catherine Gewecke, Aquatic Biologist *Catherine Gewecke*

SUBJECT: Modifications (3rd Response) DAR Comments for the State of HI CZM's Fed. Consistency Rev. of Naval Spc. Ops. Training Activities on Non-Fed. Areas, HI

Request Submitted by: Hawaii Coastal Zone Management Program

Location of Project: State of Hawaii (Hawaii Island, Oahu, Maui, Molokai, Lanai and Kauai)

Brief Description of Project:

Modifications of DAR Comments submitted on 6/29/2020 (for original comments & 2nd set of comments, see DAR #5935-A). For comments w/ maps see Appendix at end. The Navy is proposing conduct small-unit maritime & air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters & selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Comments:

No Comments Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved: *Brian J. Neilson* Date: Oct 15, 2020
 Brian J. Neilson
 DAR Administrator

DAR# 5935-B

Brief Description of Project

Modifications of DAR Comments submitted on 6/29/2020 (for original comments & 2nd set of comments, see DAR #5935-A). For comments w/ maps see Appendix at end. The Navy is proposing conduct small-unit maritime & air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide). The proposed training activities consist of training by naval special operations personnel with occasional integration of other U.S. Special Operations Command components. The proposed training would take place in coastal nearshore waters & selected shoreline and inland locations throughout the State of Hawaii. This biological evaluation presented by the Navy outlines potential impacts to aquatic resources.

Water-based training activities would use existing federal and non-federal boat ramps near the selected training location to launch the training platform (small submersible vehicle, surface support craft, or small inflatable boat) into the waterway. However, some training scenarios require an ocean launch using a small ship. A ship launch may also occur during training activities in locations that are not served by an existing boat ramp (specific offshore locations of Oahu, Maui, the Island of Hawaii, Kauai, Lanai, and Molokai) or if weather or tidal conditions result in a safety concern regarding a boat ramp launch.

The categories of water-based activities that are analyzed in this document are:

- Diver/Swimmer Training Activities - During diver/swimmer training events, trainees would swim or dive to an objective area (e.g., harbor, beach, moored vessel) for up to six hours. During night training, the trainees would use buoys marked with a glow stick (Chemlight) to identify their location to the support staff. Rubber replica weapons could be carried by trainees to reproduce the bulk and weight of the gear the trainee would carry during an actual mission. Depths for this activity range up to 28 feet (ft) (8.5 meters [m]).
- Insertion and Extraction Training Activities - During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include UUV and ROVs, or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion/extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training. Rubber replicate weapons could be carried by trainees to imitate real world events. In three military areas (Puuloa Range Training Facility, JBP HH Pearl City Peninsula, and Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility), actual weapons could be carried by trainees to existing live-fire training ranges. Depths for this activity can vary.

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- **Launch and Recovery Training Activities-** During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge. Vessels such as small ships, jet skis, or small boats may be used in conjunction with training systems during certain training scenarios, and for safety and training support.
- **Unmanned Underwater Vehicle (UUV) Activities-** A subset of water-based training would involve the use of a UUV and, on occasion, a remotely operation vehicle (ROV) (herein both described as UUVs). A UUV is a small, battery-powered, unmanned submersible that is hand-launched from a host vessel and used to conduct bathymetric, oceanographic, and other geographic underwater surveys. The UUVs operate within the water column and would not be set on the floor of the ocean. UUVs operate under the same navigational rules as any water vessel and would be operated to avoid other vessels. Training activities requiring a UUV would occur concurrently approximately 30 percent of the time when diver/swimmer training activities are taking place. The launching and recovery of the UUV would be conducted in water areas only and consist of launching and recovering up to two UUVs per training event. UUVs can be autonomous or tethered and are controlled from the water surface or by a diver for real-time feedback to the operator. Diving personnel may be in the water in the near vicinity of the host vessel for the launch or retrieval portions of the activity. Underwater areas to be surveyed by the UUV are pre-programmed into the vehicles' navigation system prior to launch. UUVs are tracked by personnel on the host vessel to ensure they remain on course and, if needed, can be recovered at any point along the pre-programmed track. Depths for this activity range up to 328 ft (100 m).
- **Beach Landings/Over the Beach (as part of water-based activities) -** Some water-based activities may include a beach landing for the trainee or watercraft (e.g., diver/swimmer, launch and recovery training activities). During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective.
- **Landing/Drop Zone (as part of air-based activities) -** Naval special operations personnel would utilize existing and new and water-based drop zones within JBPHH and MCBH property to conduct air-based training activities. Water-based drop zone training activities would be conducted at sites where up to 40 trainees land after parachuting from fixed-wing aircraft at an

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Brief Description of Project

altitude between 5,000 - 1,500 feet above ground level (AGL). Water-based drop zones may also be utilized for training activities where helicopters or MV-22 aircraft approach the water surface (approximately 15 ft. AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 ft. AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area (on land or over water), trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- o Include up to 6 hours of aircraft operation per training event
- o Utilize AC-130, C-17 and MV-22 aircraft to support training with parachutes
- o Utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation over land or water
- o Hover for approximately 15 minutes when facilitating drop zone training activities
- o Coordinate use of airspace with Federal Aviation Administration Honolulu Control Facility as far in advance as possible

While training activities and events are carefully planned out, unexpected situations may occur and the Navy has planned for such contingencies. Signaling devices, such as marine flare signals, marine smoke signals, and audible recall signals are only for emergency use in accordance with naval special operations standard operating procedures established by the Navy. Navy-owned Wave Runners jet skis are used for swimmer safety and rapid response in certain events during training.

2.2 Location

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the Main Hawaiian Islands (MHI) (Figure 2-1).

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Brief Description of Project

The training study area includes five regions on Oahu (Figure 2-2): (1) Joint Base Pearl Harbor-Hickam (Figure 2-3), (2) South (Figure 2-4), (3) Windward (Figure 2-5), (4) North (Figure 2-6), and (5) West Oahu (Figure 2-7). The training study area also includes sites on or near the Island of Hawaii (Figure 2-8), Kauai (Figure 2-9), Maui (Figure 2-10), Lanai (Figure 2-11), and Molokai (Figure 2-12). Training activities would occur on federal and non-federal property, pending appropriate approvals. Training locations will vary due to seasonal weather conditions, public presence at sites, protected natural resources considerations, training qualifications to be satisfied, and training requirements. If a particular non-federal site is selected for a potential training event, communication with individual public property managers and private property owners would be conducted to establish or confirm real estate agreements to allow for training activities to be conducted.

The proposed training would take place in selected coastal nearshore waters throughout the State of Hawaii. Personnel will be familiar with locations prior to training at those locations, because reconnaissance visits to a location will be conducted prior to attempting to train in a realistic scenario. Navy divers are trained to make detailed observations about locations during reconnaissance, therefore diving personnel will be able to plan how to avoid and minimize effects to the marine environment at each location prior to training instead of responding or making decisions at the time of training without prior knowledge.

A series of best management practices (BMPs) will be applied during the proposed action. The BMPs are divided into two parts (A and B) and are outlined in Section 3 of the Biological Evaluation the Navy prepared for this activity. Part A includes BMPs directed at minimizing effects from the training on protected species. Part B includes BMPs that minimize effects from the training on the environment (including EFH). BMPs will be incorporated into the training scenario and training events, and all trainees and support personnel will be fully briefed on the BMPs and the requirement to adhere to them during the training.

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Comments

Updated/Modifications of DAR Comments submitted on 6/29/2020 (3rd set of comments from DAR) for small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide); for original comments & 2nd set of comments see DAR #5935-A.

For comments w/ maps see Appendix at end.

On August 7, 2020, DAR received an email to confirm three (3) either previously or newly proposed alternate locations for small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide).

The three locations are the following:

- 1) Confirm approval for Mahukona Beach Park (diver/swimmer, insertion/extraction (submersible use) and over the beach).
- 2) Clarification on original restriction of FMA portion of Kawaihae Harbor and requirement for Navy to consult with NPS?
- 3) Confirm approval for Honokohau Small Boat Harbor (diver/swimmer, insertion/extraction (submersible use)).

DAR responses for the three proposed alternate locations below:

1. Kawaihae Harbor: Yes, DAR is ok with training activities as proposed, as long as the Navy receives approval from DOBOR (State Division of Boating and Ocean Recreation) and consult with the Kawaihae Canoe Clubs for the use of the small boat harbor. No training activity should take place in the FMA portion (see response to your questions below).

RE (from initial email from Navy): Question 2) For Kawaihae Harbor you list no activity in inside FMA portion - outer harbor only-except for using boat launch): Conditionally Approved by DAR if consultation with NPS. Can you show exactly which area you are referring to when you say no activity in inside FMA portion - outer harbor only?-except for using boat launch): Next question why would there be a need to consult with NPS? Note we have removed from the EA the NPS site near Maliu Point.

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Comments

DAR Response: During initial consultations with the NPS, they had originally thought that part of Kawaihae Harbor may fall within the Pu`ukoholā Heiau National Historic Site Hawai'i. After review of the maps, it looks like the delineation of the Pu`ukoholā Heiau National Historic Site is just south of Kawaihae Harbor (see map below). Therefore, consultation with the NPS in terms of this location does not look like it is necessary. DAR received the correspondence below with NPS that you forwarded - it looks like they concur that the activity will not be conducted within the Pu`ukoholā Heiau National Historic Site.

(see corresponding map of Pu`ukoholā Heiau National Historic Site and Kawaihae Harbor in Appendix)

The FMA portion which DAR has requested no activity be conducted is the orange polygon delineated in the maps of Kawaihae Harbor in Appendix:
(<http://histategis.maps.arcgis.com/apps/webappviewer/index.html?id=c0dc296ff373486baa9e041e40f445b2>)

Final determination: Activities in the outer areas of Kawaihae Harbor (outside the orange polygon) have been approved as proposed by the Navy in DAR's original comments: "Kawaihae Harbor (No "Over Beach"- no activity in inside FMA portion – outer harbor only-except for using boat launch): Conditionally Approved by DAR if consultation with NPS results in approval" - (Update: consultation has been determined to not be necessary, as NPS delineation does not overlap training area). Navy should consult with DOBOR (State Division of Boating and Ocean Recreation) and consult with the Kawaihae Canoe Clubs for the use of the small boat harbor.

Note: There may be areas of dense coral cover in areas outside the harbor (near the entrance channel of the harbor) – it would be beneficial for the Navy team to conduct reconnaissance of of this area and consult coral/benthic coverage maps (see maps in Appendix) to determine if submersible maneuvers may have impact on coral resources when transiting into the harbor.

2. Mahukona Beach Park/Harbor: Mahukona Beach Park was not a location was evaluated in the initial review process by DAR.

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Comments

DAR Response: After review, DAR is ok with training activities as proposed if the Navy consults with the City and County for the use of the Mahukona Beach Park. The Navy should also consult with Surety Kohala who manages the private land that is adjacent to the Mahukona Beach Park and wharf area. In addition, because of the dense user issues in Mahukona Beach Park, DAR requests that the Navy consult with Toni Withington on behalf of various user stakeholder groups, to confirm that training will not overlap with day or night fishing activities (night spear fishing, night diving, night shoreline fishing) which may be hard to identify when conducting training operations and may result in accidental interactions.

Note: The google earth image looks like the area may be dense with coral habitat and relatively shallow by the beach park. The Navy should conduct reconnaissance of this area (and consult coral/benthic coverage maps) to ensure the area is deep enough for submersible maneuvers close to shore. For "over-beach activities" DAR requests that the Navy conduct reconnaissance of this area and consult any coral coverage maps to confirm divers exiting the waters onto the beach, will not be crawling over coral.

3. Honokohau Small Boat Harbor: DAR Response: DAR is ok with training maneuvers in the small boat harbor as proposed, as long as Navy reviews the map of the coral/benthic coverage for the transit into the harbor and consults with NPS – the Navy boats will be traversing NPS waters (see map in Appendix) to get into Honokohau Small Boat Harbor. If NPS is ok with the Navy boats traversing this portion of the park, then DAR is ok with the training activities.

This area also falls within one of DAR's Marine Managed Area (Kaloko - Honokōhau Fish Replenishment Area and Netting Restricted Area); after review of the coral coverage in this area, there is an average 10-50% coral cover, with some areas ranging between 50-90% and 90-100% coral cover (see maps below), which may make submersible maneuvers difficult without impact to coral resources. DAR requests that Navy conduct reconnaissance of this area (and consult coral/benthic coverage maps) to ensure the area is deep enough for submersible maneuvers when transiting into the harbor:

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Comments

See additional versions of the coral coverage map for entrance to Honokohau Small Boat Harbor in Appendix and at the following link:
<https://www.pacioos.hawaii.edu/projects/coral>

No activity will occur in any other section of the Kaloko - Honokōhau NPS/FRA/NRA, other than the activity in the Honokohau Small Boat Harbor.

Coral Coverage/Benthic Map Overlays (see Appendix):

DAR's recommendation would be to consult satellite maps like World View or Google Earth (or if Navy has something with even higher resolution, that would work best) and then additionally consult coral/benthic coverage overlays or maps from:

<https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=835a1ded67ab488bb18ce50f7e09424c>

See example for Kawaihae Harbor in Appendix. In order to get benthic coverage like this, turn on the layers shown below (Hawaii Marine Biogeographic Assessment - Chapter 3 – Benthics: Species Richness-Hard Coral + Percent Cover-Hard Coral + Benthic Habitat Map-Biological Cover):

Or this layer can be utilized (see examples in Appendix):

<http://www.pacioos.hawaii.edu/voyager/index.html?b=21.236891,-158.309883,21.723771,-157.63903&t=h&o=benth:1::d110o90>

(For this map make sure you click which island is being looked at from the drop-down menu under the "Sea Floor" overlay tab in the left hand menu (under "benthic habitats") and check the "show legend" box);

Or the coral coverage map at this link may be utilized (this one may be lower resolution):

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DAR# 5935-B

Comments

All of these datasets are relatively old (2007-2013) and were produced with different methods (former was LIDAR and latter was from diver surveys and environmental datasets – they both may have some extrapolation or interpolation involved); there's a chance benthic cover may have changed over time and additionally there may be more recent datasets.

The layers used in these maps may also be able to be downloaded here (if the Navy is making their own maps in ArcMap):

https://gis.ngdc.noaa.gov/arcgis/rest/services/nccos/BiogeographicAssessments_NCCOS_MHIMarineBiogeographicAssessment/MapServer/24

For clarification: the above comments are only the updates or modifications of DAR Comments (3rd set of comments from DAR) submitted on 6/29/2020, to confirm three (3) either previously or newly proposed alternate locations (Mahukona Beach Park, Kawaihae Harbor and Honokohau Small Boat Harbor) for small-unit maritime and air-based training activities for Naval Special Warfare Command (NSWC) personnel in Hawaii (Statewide).

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Thank you for providing DAR the opportunity to review and comment on the Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.

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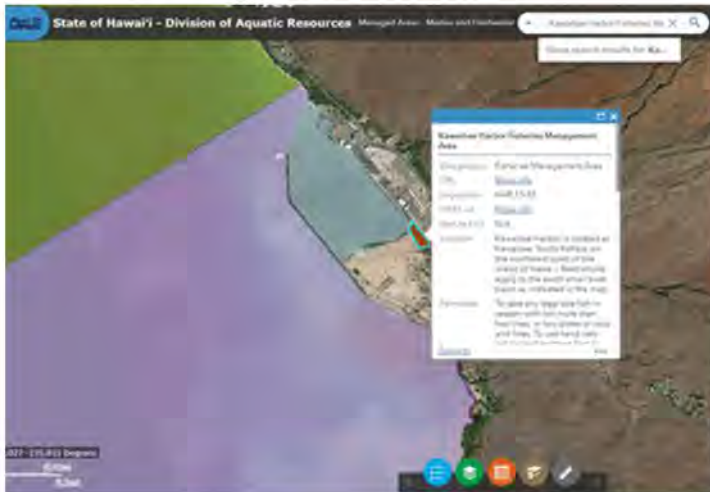
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Final determination: Activities in the outer areas of Kawaihae Harbor (outside the orange polygon) have been approved as proposed by the Navy in DAR's original comments: *"Kawaihae Harbor (No "Over Beach" - no activity in inside FMA portion - outer harbor only-except for using boat launch): Conditionally Approved by DAR if consultation with NPS results in approval"* - (Update: consultation has been determined to not be necessary, as NPS delineation does not overlap training area). Navy should consult with DOBOR (State Division of Boating and Ocean Recreation) and consult with the Kawaihae Canoe Clubs for the use of the small boat harbor.

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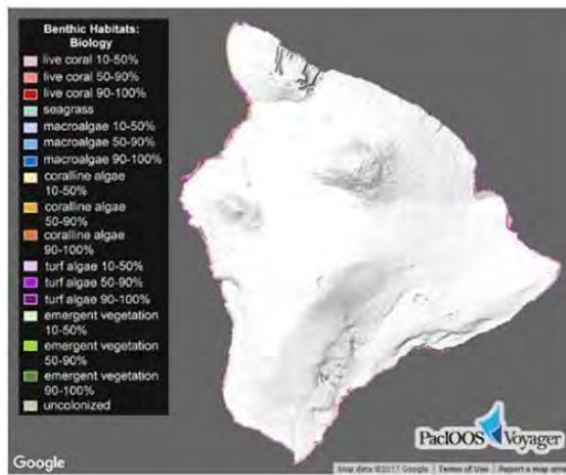


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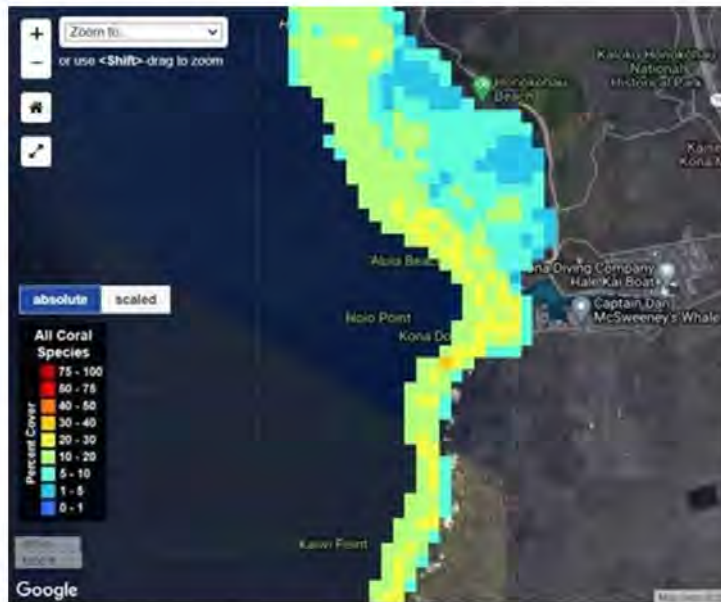
Maps of coral/benthic coverage for Honokōhau small boat harbor/Kaloko - Honokōhau Fish Replenishment Area and Netting Restricted Area:



Map Legend:



Another version of the coral coverage map for entrance to Honokohau Small Boat Harbor: <https://www.pacioos.hawaii.edu/projects/coral>



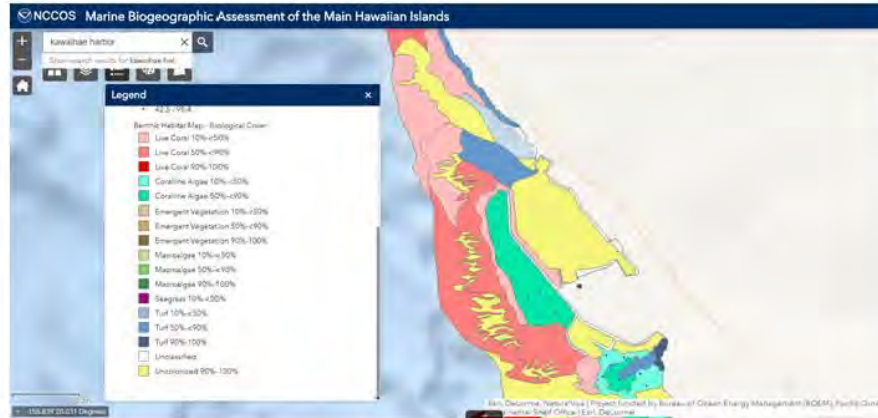
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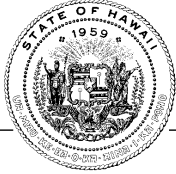
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For clarification: the above comments are only the modifications of DAR Comments (3rd Set of Comments from DAR) submitted on 6/29/2020, to confirm three (3) either previously or newly proposed alternate locations for training activities (Mahukona Beach Park, Kawaihae Harbor and Honokohau Small Boat Harbor).

For original comprehensive comments & 2nd set of comments, see DAR #5935-A.

Thank you for providing DAR the opportunity to review and comment on the Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on Non-Federal Areas, State of Hawaii. Should there be any changes, amendments or modifications to the current plans, DAR requests the opportunity to review and comment on those changes.

A.4.9 Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on State of Hawaii Lands located at Kaena Point, Oahu (17Feb21)



**OFFICE OF PLANNING
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DAVID Y. IGE
GOVERNOR
MARY ALICE EVANS
DIRECTOR
OFFICE OF PLANNING

DTS 202101071412NA

February 17, 2021

Ms. Sherri R. Eng
Director
Regional Environmental Department
Department of the Navy
Commander
Navy Region Hawaii
850 Ticonderoga Street, Suite 110
JBPHH, Hawaii 96860-5101

Attention: Mr. John Bigay, NAVFAC Pacific (by email)

Dear Ms. Eng:

Subject: Hawaii Coastal Zone Management Program Federal Consistency Review of Naval Special Operations Training Activities on State of Hawaii Lands located at Kaena Point, Oahu

The Hawaii Coastal Zone Management (CZM) Program has completed the federal consistency review of the Department of the Navy, Navy Region Hawaii, CZMA consistency determination for the U.S. Naval Special Warfare Command (NSWC) to conduct Naval Special Operations (NSO) special reconnaissance training on land areas owned by the State of Hawaii located adjacent to the U.S. Air Force Kaena Point Satellite Tracking Station at Kaena Point, Oahu (proposed activity). This federal consistency review covers the special reconnaissance training activities occurring on non-federal areas within the Kaena Point training area, for which authorization to use the State of Hawaii owned land will be obtained and can only be used for up to ten events per year, as represented in the consistency determination. The maximum number of NSO events across all non-federal land training sites remains at 330 events per year, as previously reviewed for federal consistency (July 1, 2020).

The Hawaii CZM Program published a public notice in the State Office of Environmental Quality Control publication, "The Environmental Notice," on January 23, 2021, with the public review and comment period concluding on February 8, 2021. During the public notice period no public comments or inquiries were received. Agency comments were received from the State of Hawaii Department of Land and Natural Resources.

Ms. Sherri R. Eng
February 17, 2021
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We conditionally concur with the Navy's determination that the proposed activity is consistent to the maximum extent practicable with the enforceable policies of the Hawaii CZM Program based on the following conditions.

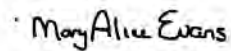
1. The proposed activity shall be carried out as represented in the CZM federal consistency determination and all supporting materials and information provided to the Hawaii CZM Program. Any changes to the proposed activity shall be submitted to the Hawaii CZM Program for review and approval. Changes to the proposed activity may require a full CZM federal consistency review, including publication of a public notice and provision for public review and comment. This condition is necessary to ensure that the proposed activity is implemented as reviewed for consistency with the enforceable policies of the Hawaii CZM Program. Hawaii Revised Statutes (HRS) Chapter 205A Coastal Zone Management, is the federally approved enforceable policy of the Hawaii CZM Program that applies to this condition.
2. The proposed activity shall be conducted in compliance with the requirements of the State Historic Preservation Division (SHPD) concurrence of "no adverse effect to historic properties," issued May 29, 2020, for the National Historic Preservation Act Section 106 review, and the HRS Chapter 6E Historic Preservation review. HRS Chapter 6E is the federally approved enforceable policy of the Hawaii CZM Program that applies to this condition.
3. The proposed activity shall be conducted with the authorization of the landowner, State of Hawaii Department of Land and Natural Resources (DLNR), as represented in the consistency determination. A copy of the written authorization shall be provided to the Office of Planning Hawaii CZM Program prior to commencing any NSO training activities on non-federal areas at the Kaena Point training area. This condition is necessary to ensure that the proposed activity is implemented as reviewed for consistency with the enforceable policies of the Hawaii CZM Program. HRS Chapter 205A Coastal Zone Management, is the federally approved enforceable policy of the Hawaii CZM Program that applies to this condition.

If the requirements for conditional concurrences specified in 15 CFR § 930.4(a), (1) through (3), are not met, then all parties shall treat this conditional concurrence letter as an objection pursuant to 15 CFR Part 930, subpart C. The federal agency shall immediately notify the Hawaii CZM Program if the conditions are not acceptable in accordance with 15 CFR § 930.4(a)(2). Otherwise, acceptance of the conditions shall be presumed at the end of the 90-day federal consistency notification period on April 8, 2021.

Ms. Sherri R. Eng
February 17, 2021
Page 3

This CZM consistency conditional concurrence does not represent an endorsement of the proposed activity nor does it convey approval with any regulations administered by any state or county agency. Thank you for your cooperation in complying with the Hawaii CZM Program. If you have any questions, please contact John Nakagawa of our CZM Program at john.d.nakagawa@hawaii.gov or (808) 587-2878.

Sincerely,



Mary Alice Evans
Director

cc: Stephanie Hacker, SHPD (by email)
DLNR, Land Division (by email)

A.4.10 Addendum to 23 Jan 2019 CZMA Negative Determination Letter, Naval Special Operations Training Activities in Hawaii: Federal Lands – U.S. Air Force-leased Lands at the Kaena Point Satellite Tracking Station (25Mar21)

DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

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March 25, 2021

Mary Alice Evans, Director
Office of Planning, State of Hawaii
Coastal Zone Management Program
P.O. Box 2359
Honolulu, Hawaii 96804

Dear Ms. Evans:

SUBJECT: ADDENDUM TO 23 JANUARY 2019 COASTAL ZONE MANAGEMENT ACT (CZMA) NEGATIVE DETERMINATION LETTER, NAVAL SPECIAL OPERATIONS (NSO) TRAINING, STATE OF HAWAII

On January 23, 2019 the U.S. Department of the Navy (Navy) submitted a Negative Determination Letter for proposed NSO training conducted on Federal lands throughout the State of Hawaii (Enclosure 1). That January 2019 Negative Determination did not address the proposed Kaena Point training study area that includes U.S. Air Force (USAF)-leased lands at the Kaena Point Satellite Tracking Station (KPSTS) (Figure 1). This letter serves as an addendum to that original Negative Determination and addresses the proposed NSO training activities within the Kaena Point training study area.

In accordance with the Federal Coastal Zone Management Act of 1972 (CZMA) as amended, Section 307c(1), the Navy has determined that proposed NSO training conducted on USAF-leased lands within the Kaena Point training study area will not affect the coastal uses or resources and therefore, does not require a consistency determination.

Non-federal lands in the Kaena Point training study area have been evaluated in a separate Federal Consistency Determination.

PROJECT DESCRIPTION

Only special reconnaissance training activities would occur within the Kaena Point training study area. Upon arrival at an area to conduct special reconnaissance training, trainees would hike to a designated observation point. Trainees are taught the techniques for conducting reconnaissance without alerting anyone to their presence or location. Trainees would remain undetected for a period of time with the goal of leaving no trace of their presence behind. This includes no vegetation trampled, no branches broken, no footprints visible, or any other indicators that they were there. Trainees would use observation techniques, following procedures, and reporting back on a scenario involving role-play with military instructors or support staff. No reconnaissance would be intentionally performed on activities other than those staged with military participants and pre-arranged for training purposes.

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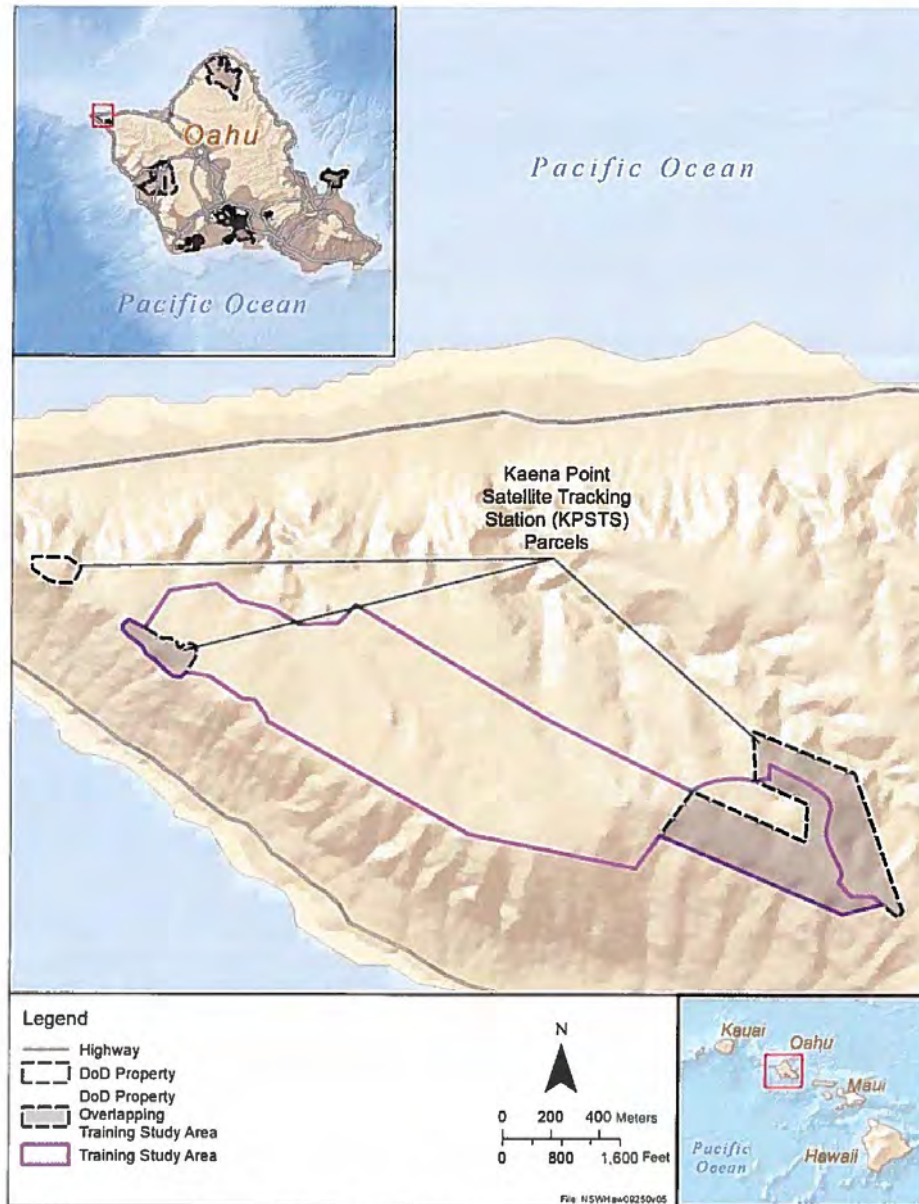


Figure 1. Kaena Point Training Study Area

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March 25, 2021

The purpose of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a variety of locations with dynamic ocean conditions and land types in a warm-weather environment. As part of the training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. To support the intent of the training, there is no use of live-fire ammunition, explosives, off-road driving, digging, tree climbing, construction, or the building of camp fires or infrastructure. However, as part of this proposed action, activities may be combined with other actions occurring on Federal lands under other authorizations.

During a typical training event, there would be up to 20 trainees and up to 15 support personnel (or up to 35 people in total) at a training site within the training study area. Support personnel would be divided up to assist the training activity. It is assumed for purposes of analysis that not all support personnel would be on land at any given time. Support personnel are responsible for the safety and oversight of trainees participating in the activity. The support personnel continually evaluate the training scenario and employ standard operating procedures (SOPs) to ensure that training activities are isolated and remain safe. Trainees receive safety briefings, have constant oversight by instructors, and Naval Special Warfare Command (NSWC) Public Affairs Officers or their representatives would be available to interact with the public should anyone approach an active training scenario. Additionally, as part of the training objective that the activities be undetected, the support personnel teach trainees that no expended equipment, human waste, or transported liquids remain on site after the training activity is completed. One unmarked NSWC vehicle designated as an emergency response vehicle would be utilized by the support personnel; vehicles used by support personnel would be parked in designated areas that afford optimal availability if required during a training event.

Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. As training activities are scheduled, compatible sites within the training study area would be selected to support each training objective. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training requirements and training qualifications. Not all sites within the training study area would be utilized over a 1-year period. Site selection would also consider seasonal conditions (e.g., high winds) and site conditions (e.g., protected natural resources considerations).

Impact Avoidance and Minimization Measures

This section presents an overview of best management practices (BMPs) and SOPs that NSWC would incorporate into the proposed NSO training activities. BMPs and SOPs are existing policies, practices, and measures to reduce the potential environmental impacts of designated activities, functions, or processes. Although BMPs and SOPs mitigate potential impacts by avoiding, minimizing, or reducing/eliminating impacts, BMPs and SOPs are distinguished from potential mitigation measures because BMPs and SOPs are: (1) existing

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requirements for the proposed action; (2) ongoing, regularly occurring practices; or (3) not unique to the proposed action. In other words, the BMPs and SOPs identified in this document are inherently part of the proposed action and are not potential mitigation measures proposed as a function of the Environmental Assessment process for the proposed action. Table 1 includes a list of BMPs and SOPs.

Table 1. BMPs and SOPs for NSO Training

BMP/SOP Description	Purpose
Land-based training will have a minimum of three onsite safety personnel: Lead and Assistant Safety Supervisors, and qualified medic. The medic will stage an emergency response vehicle onsite.	Maintain safety of trainees and the public.
Vehicles will remain on existing established roadways, and sound will be minimized during training to avoid detection.	Maintain safety of trainees and the public, and avoid impacts to terrestrial resources.
All training events will be conducted in accordance with military training procedures, approved SOPs, and protective measures, including Chief of Naval Operations Instruction 5100.23G, <i>Navy Safety and Occupational Health Program Manual</i> .	Maintain safety of trainees and the public.
NSO personnel will adhere to military installation-specific SOPs or other measures such as those detailed in the installation Integrated Natural Resources Management Plan (INRMP). An INRMP integrates conservation measures as SOPs to minimize and avoid potential impacts to natural resources on military installations while maintaining military readiness.	Comply with established natural resource management procedures and measures.
Biosecurity planning is a standard operating procedure during exercise planning and execution. All training events would be conducted in accordance with existing military training procedures, approved SOPs, and protective mitigation measures that are in place to avoid or minimize the potential for biosecurity concerns. NSO personnel would follow site-specific recommendations in Navy, Marine Corps, Army, and Air Force installations in Hawaii, where activity planners and resource managers have a suite of recommendations to reduce, to the maximum extent practical, the transport, introduction, and establishment of potentially invasive species. Host installations and property owners/managers are responsible for relaying any installation-specific biosecurity instructions.	Biosecurity

NEGATIVE DETERMINATION

After thorough assessment, the Navy has determined that the proposed action, as described above, would not conflict with CZMA policies. Training activities subject to this Negative Determination would occur on federal property; therefore, these areas are not within the coastal

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zone. Additionally, the proposed action would be compatible with the objectives, policies and guidance of other state and local land use plans. It is important to note that no land is being acquired, rezoned or changed for the proposed action and the proposed activities are consistent to the maximum extent practicable with the enforceable policies of Hawaii's CZMA program. Section 304 of the Act states that the term coastal zone does not include lands the use of which is by law subject solely to the discretion of or which is held in trust by the Federal government. This exempts all lands federally owned, leased, or held in trust. That stated, the Navy recognizes that actions outside the coastal zone may affect land or water uses or natural resources along the coast and therefore are subject to the provisions of the Act. Consequently, an analysis of the impacts of the proposed action on the coastal zone was conducted for the following areas:

1. Land Use Compatibility - The proposed training activities are proposed for Federal land where public access is already restricted. The proposed activity would not further restrict access. Right of entry permits and real estate agreements would be obtained prior to conducting training in areas where consent is needed.
2. Traffic - The Proposed Action would not change or alter transportation facilities or circulation of traffic patterns within the training study area or surrounding area.
3. Noise - Training activities would generally occur away from residentially zoned areas and the operational conditions of land-based activities is to remain undetected and leave no trace of presence during or after the training. Disturbances are expected to be short term and infrequent and any impacts on points of interest are minimal and short term based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities.
4. Topography and Soils - The Proposed Action does not include construction on undeveloped lands or ground-disturbing activities in any undisturbed areas.
5. Air Quality - Transportation vehicles and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on the ambient air quality of the region. In addition, the dispersive nature of the proposed activities would prevent pollutants from concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed NAAQS. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination.
6. Biological Resources - The Navy determined the proposed action may affect but would not adversely affect the Endangered Species Act (ESA)-listed endangered plant species *Bidens amplexans* that occurs within the training study area and conducted ESA section 7 consultation with the U.S. Fish and Wildlife Service (USFWS). On March 16, 2021,

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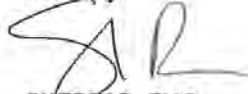
the USFWS issued a letter of concurrence with the Navy's findings that implementation of the Proposed Action may affect, but is not likely to adversely affect, *Bidens amplexans*. Impacts on terrestrial vegetation and wildlife are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, (4) brief duration of the activities, and (5) implementation of SOPs designed to minimize or avoid impacts on biological resources.

7. Cultural Resources - The Navy does not anticipate any adverse effects to historic properties in accordance with the Section 106 Implementing Regulations. The Navy consulted with the Hawaii State Historic Preservation Division (SHPD), Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking would result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act. On May 29, 2020, the Hawaii SHPD concurred with a Finding of No Adverse Effect.
8. Water Resources - The Proposed Action would not impound, divert, drain, control, or otherwise modify the waters of any stream or other body of water. The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action.
9. Infrastructure - The Proposed Action does not include changes to infrastructure within the training study area. There would be no disruption or change to existing wastewater, water, or telecommunication services associated with the Proposed Action.
10. Visual Resources - The Proposed Action does not include construction or permanent new structures over an undisturbed area and would not alter the visual landscape within the training study area.
11. Hazardous Materials and Wastes - The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of BMPs, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended material such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly.

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March 25, 2021

Based on the information summarized above, the Navy has determined that the implementation of the NSO training on USAF-leased lands within the Kaena Point training study area would have no effect on coastal uses or resources of Hawaii. My Point of Contact for this matter is Mr. John Bigay, at john.bigay@navy.mil, or 808-472-1196.

Sincerely,



SHERRI R. ENG
Director
Regional Environmental Department
By direction of the
Commander

Enclosure: 1: January 23, 2019 Coastal Zone Management Act (CZMA) Negative
Determination Letter, Naval Special Operations Training, State of Hawaii



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101



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Ser N45/0410
January 23, 2019

CERTIFIED NO: 7016 0910 0001 0892 1557

Mr. Leo R. Asuncion, Director
Office of Planning, State of Hawaii
Coastal Zone Management Program
P.O. Box 2359
Honolulu, Hawaii 96804

SUBJECT: Coastal Zone Management Act (CZMA) Negative Determination Letter, Naval
Special Operations Training, State of Hawaii

Dear Mr. Asuncion:

In accordance with the Federal Coastal Zone Management Act of 1972 (CZMA) as amended, Section 307c(1), the United States (U.S.) Department of the Navy (Navy) has determined that naval special operations training conducted on Federal lands throughout the State of Hawaii will not affect the coastal uses or resources and therefore, does not require a consistency determination.

Activities on Federal land that are included on the "*Navy/Marine Corps De Minimis Activities Under CZMA*" have already been submitted and concurred with by the Hawaii Coastal Zone Management (CZM) Program. Per the July 9, 2009 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed activities are subject to and bound by full compliance with the "Project Mitigation/General Conditions."

Federal lands that are not included in the "*Navy/Marine Corps De Minimis Activities Under CZMA*" are included in this "Negative Determination." These lands include U.S. Coast Guard Station Barbers Point and the Kanies Drop Zone at Kahuku Training Area.

Non-federal lands in the training study area will be evaluated in a separate *Federal Consistency Determination*.

PROJECT DESCRIPTION

See Attachment 1 for a full project description.

Federal lands included in this "Negative Determination" include U.S. Coast Guard Station Barbers Point and the Kanies Drop Zone.

ENCLOSURE 1

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Proposed activities at U.S. Coast Guard Station Barbers Point include:

- Insertion and Extraction
- Over the Beach
- Special Reconnaissance
- Unmanned Aerial System

Proposed activities at Kanies Drop Zone include:

- Landing/Drop Zone
- Unmanned Aerial System

Insertion and Extraction Training Activities

During insertion/extraction training events, trainees would be trained to approach or depart an objective area using submersible craft, to include unmanned underwater vehicles (UUV) and remotely operated vehicles (ROVs), or watercraft (such as jet skis, waverunners, or small boats). This activity trains personnel to effectively insert and extract people and equipment during the day or night. Submersible and surface crafts would have lighting for night training. Insertion / extraction training events utilizing submersible craft would operate along the shoreline to conduct water-based training.

Over-the-Beach Training Activities

During an over-the-beach training activity trainees would exit the water, cross the beach, and quietly transition to land-based activities. Upon arrival at a pre-designated area, trainees would remain out of sight for several hours before exiting the site or continuing to move towards a pre-determined objective. Rubber replicate weapons could be carried by trainees to imitate real-world events.

Special Reconnaissance Training Activities

Upon arrival at a designated area, trainees would hike to a designated observation point. Trainees are taught the techniques for conducting reconnaissance without alerting anyone to their presence or location. Trainees would remain undetected for a period of time with the goal of leaving no trace of their presence behind. This includes no vegetation trampled, no branches broken, no footprints visible, or any other indicators that they were there. Trainees would use observation techniques, following procedures, and reporting back on a scenario involving role-play with military instructors or support staff. No reconnaissance would be intentionally performed on activities other than those staged and pre-arranged for training purposes.

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Drop Zone Training Activities

Naval special operations personnel would utilize existing and new land-based and water-based drop zones to conduct air-based training activities. Land-based drop zone training activities are conducted at sites where up to 40 trainees land after parachuting from a fixed-wing aircraft at an altitude between 12,500 and 500 feet above ground level (AGL). Land-based drop zones may also be utilized for training activities where helicopters or MV-22 aircraft approach the ground surface (approximately 5–15 feet AGL) and up to 15 trainees practice inserting into an area or extracted (approximately 5 feet AGL) out of an area via helicopter rope suspension techniques. These techniques include rappelling, fast roping, casting, special patrol insertion and extraction, or hoist operation. Rappelling, fast roping, and special patrol insertion and extraction are techniques used to lower oneself down a rope quickly into an area that does not permit aircraft landing. A hoist operation is a technique used to extract trainees out of an area. Trainees practice extraction techniques in drop zones, such as being retrieved by a helicopter or MV-22 aircraft via a rope that is lowered into a pickup area, trainees hooking up to the specialized rope, and the helicopter vertically lifting from the extraction zone until the rope and trainees are clear of obstructions. Naval special operations drop zone training activities would:

- include up to 6 hours of aircraft operation per training event
- utilize AC-130, C-17, MV-22, or similar aircraft to support training with parachutes
- utilize MV-22 aircraft or helicopters to support rappelling, fast roping, special patrol insertion and extraction or hoist operation
- hover for approximately 15 minutes when facilitating drop zone training activities via helicopter or MV-22
- coordinate use of airspace with FAA Honolulu Control Facility as far in advance as possible

Unmanned Aircraft Systems Training Activities

The UAS consists of a hand-launched or catapult system, a control system, and a remotely piloted or self-piloted (i.e., preprogrammed flight pattern) air vehicle that may be fixed-wing or rotary-wing. They would carry only non-hazardous payloads such as cameras, sensors, and communications equipment. Propulsion is through electrical motor-driven propellers powered by rechargeable batteries. UASs would be deployed and fly within an authorized training area over federal property (such as restricted airspace and warning areas), as prescribed by the DoD and FAA. For training outside restricted airspace or warning areas, the UAS would be flown over federal property in accordance with a valid FAA Certificate of Authorization. UAS training may be a standalone activity or used in conjunction with all training activities, with the exception of in drop zones. UAS utilized for proposed training would:

- be categorized as FAA Group 1 or Group 2 systems, weighing up to 55 pounds
- vary in size up to approximately 2 meters in length, with a wingspan of 3 meters

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- normally operate below 3,500 feet AGL
- utilize on the ground observers (no manned aircraft observers)
- fly in accordance with FAA authorizations

See Attachment 1 for a full, detailed Project Description.

NEGATIVE DETERMINATION

After thorough assessment, the Navy has determined that the proposed action, as described above, would not conflict with CZMA policies. Training activities subject to this Negative Determination would occur on federal property; therefore, these areas are not within the coastal zone. Additionally, the proposed action would be compatible with the objectives, policies and guidance of other state and local land use plans. It is important to note that no land is being acquired, rezoned or changed for the proposed action and the proposed activities are consistent to the maximum extent practicable with the enforceable policies of Hawaii's CZMA program. Section 304 of the Act states that the term coastal zone does not include lands the use of which is by law subject solely to the discretion of or which is held in trust by the Federal government. This exempts all lands federally owned, leased, or held in trust. That stated, the Navy recognizes that actions outside the coastal zone may affect land or water uses or natural resources along the coast and therefore are subject to the provisions of the Act. Consequently, an analysis of the impacts of the proposed action on the coastal zone was conducted for the following areas:

1. Land Use Compatibility - The proposed training activities are proposed for Federal land where public access is already restricted. The proposed activity would not further restrict access. Right of entry permits and real estate agreements would be obtained prior to conducting training in areas where consent is needed.
2. Traffic - The Proposed Action would not change or alter transportation facilities or circulation of traffic patterns within the training study area or surrounding area.
3. Noise - Training activities would generally occur away from residentially zoned areas and the operational conditions of land-based activities is to remain undetected and leave no trace of presence during or after the training. In addition, the operational conditions of aviation activities to maintain elevations above 2,000 feet except for short periods (below 500 feet for approximately 10 minutes) associated with proposed training avoids and minimizes noise and potential noise impacts. Disturbances are expected to be short term and infrequent and any impacts on points of interest are minimal and short term based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities.
4. Topography and Soils - The Proposed Action does not include construction on undeveloped lands or ground-disturbing activities in any undisturbed areas.

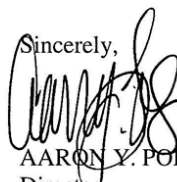
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5. Air Quality - Transportation vehicles, vessels, aircraft and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on the ambient air quality of the region. In addition, the dispersive nature of the proposed activities would prevent pollutants concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed NAAQS. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination.
6. Biological Resources - The Navy determined the proposed action may affect but would not adversely affect biological resources and thus initiated Section 7 Consultation under the Endangered Species Act with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) seeking concurrence.
7. Cultural Resources - The Navy does not anticipate any adverse effects to historic properties in accordance with the Section 106 Implementing Regulations. Section 106 consultation was initiated with SHPD in August 2018 to assess the effects of the proposed action on historic properties.
8. Water Resources - The Proposed Action would not impound, divert, drain, control, or otherwise modify the waters of any stream or other body of water. The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action.
9. Infrastructure - The Proposed Action does not include changes to infrastructure within the training study area. There would be no disruption or change to existing wastewater, water, or telecommunication services associated with the Proposed Action.
10. Visual Resources - The Proposed Action does not include construction or permanent new structures over an undisturbed area and would not alter the visual landscape within the training study area. In addition, any vegetation clearing (only proposed at one location) would not change the overall composition of the landscape.
11. Hazardous Materials and Wastes - The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of best management practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended material such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations.

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training. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly.

Based on the information summarized above, the Navy has determined that the implementation of the naval special operations training on Federal property would have no effect on coastal uses or resources of Hawaii. My POC for this matter is Mr. James Furuhashi, at james.furuhashi@navy.mil, or (808) 472-9702.

Sincerely,


AARON Y. POENTIS
Director
Regional Environmental Department
By direction of the
Commander

Enclosure: Attachment 1

ATTACHMENT 1
NAVAL SPECIAL OPERATIONS TRAINING STATE OF HAWAII
PROJECT DESCRIPTION

The United States (U.S.) Naval Special Warfare Command (NSWC) proposes to conduct small-unit intermediate and advanced land and maritime training activities for naval special operations personnel. U.S. NSWC is the U.S. Department of the Navy's (Navy's) special operations force and the maritime component of the U.S. Special Operations Command (USSOCOM). The proposed training activities consist of training by naval special operations personnel with occasional integration of other USSOCOM components, including U.S. Army Special Operations Command, Marine Corps Special Operations Command, Air Force Special Operations Command, and Joint Special Operations Command. The occasional integration of other USSOCOM components would occur only with NSWC-led training.

The proposed training activities broadly fit into three categories: water-based training, land-based training, and air-based training. Water-based training generally includes naval special operations personnel diving/swimming, launching/recovering small vehicles designed to operate underwater (submersible) as discreet activities, or in combination. Water based training may also incorporate inserting and extracting naval special operations personnel or equipment using watercraft as part of a training event and prior to performing a land-based training component. Land-based training would include personnel transiting over the beach on foot, simulating building clearance activities using simulated munitions, in limited areas engaging in high angle climbing, and using observation techniques in a pre-arranged scenario (special reconnaissance operations with military role players). Air-based training would include the use of unmanned aircraft systems (UAS) or aircraft utilizing drop zones or landing zones for parachute or rope suspension training activities. The proposed training would take place in selected coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii.

The purpose of the Proposed Action is to ensure that special operation forces acquire and master the individual and team skills in the marine, terrestrial, and aviation aspects of naval special operations in order to progress to more advanced training and to be combat-ready when called to conduct special operations in support of Combatant Commanders. Naval special operations personnel must be ready for a variety of military operations—from large-scale conflict to maritime security and humanitarian assistance/disaster relief—to respond to the dynamic, social, political, economic, and environmental issues that may arise. The need of the Proposed Action is to meet requirements under 10 U.S. Code Section 167 for the Commander, USSOCOM to provide combat-ready forces.

To facilitate naval special operations training in a variety of ocean conditions, proposed training sites have been identified on or near six of the main Hawaiian Islands. Training would occur in the nearshore waters and land-based areas on Oahu, Island of Hawaii, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai. The training study area includes five regions on Oahu (Figure 1): (1) Joint Base Pearl Harbor-Hickam (JBPHH) (Figure 2), (2) South (Figure 3), (3) Windward (Figure 4), (4) North (Figure 5), and (5) West Oahu (Figure 6).

The training study area also includes sites on or near the Island of Hawaii (Figure 7), Kauai (Figure 8), Maui (Figure 9), Lanai (Figure 10), and Molokai (Figure 11). Training activities would occur on federal and non-federal property pending appropriate approvals.

Activities on Federal land and that are included on the "*Navy/Marine Corps De Minimis Activities Under CZMA*" have already been submitted and concurred with by the Hawaii Coastal Zone Management

(CZM) Program. Per the July 9, 2009 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed activities are subject to and bound by full compliance with the "Project Mitigation/General Conditions."

Federal lands that are not included in the "Navy/Marine Corps De Minimis Activities Under CZMA" are being evaluated under this "Negative Determination."

Non-federal lands in the training study area are being evaluated under a Federal Consistency Determination.

Table 1 identifies the NSO HI training study areas, associated landownership, and CZMA coverage.

Table 1- NSO HI Property List and CZMA Coverage

	Land Ownership	De Minimis List	Negative Determination	Federal Consistency Determination
OAHU				
JBPBH Region				
Pearl City Peninsula Annex	Federal	X		
Inactive Ship Yard	Federal	X		
Waipi'o Peninsula	Federal	X		
Ford Island	Federal	X		
Mobile Diving Salvage Unit	Federal	X		
Honeymoon Beach	Federal	X		
Puuloa Demolition Range	Federal	X		
Puuloa Rifle Range	Federal	X		
Iroquois Point Harbor	Private			X
Fort Kamehameha	Federal	X		
West Region				
Keawaula Beach	State			X
Kaena Point Satellite Tracking Station	Federal	X*		

Makaha Beach	State			X
Ulehawa Beach	State			X
Lualualei Ranges	Federal	X		
Ko'olina Marina	Private			X
Barbers Point Harbor	State			X
South Region				
U.S. Coast Guard Station Barbers Point	Federal and State		X	
White Plains Beach	State			X
Ke'ehi Boat Harbor	Private and State			X
Sand Island Beach	State			X
Kewalo Basin	Private and State			X
Ala Moana Beach	State			X
Maunaloa Boat Ramp	State			X
Windward Region				
Makapuu Beach	State			X
Waimanalo Beach	State			X
Kailua Beach	State			X
Marine Corps Base Hawaii	Federal	X		
He'eia Ramp	State			X
Kahana Bay	State			X
North Region				
Kanes Drop Zone	Federal		X	
Waimea Beach	State			X
Halewia Boat Ramp	State			X
Makaleha Stream	State			X

Dillingham	State			
BIG ISLAND				
Mahukona State Beach	State			X
Kawaihae Harbor	Private and State			X
Maliu Park	State			X
KAUAI				
Pacific Missile Range Facility Barking Sands/Mana Point	Federal	X		
Polihaie State Park	State			X
MAUI				
Maalaea	Private and State			X
MOLOKAI				
Haleolono Harbor	State			X
Kaunakakai	State			X
LANAI				
Kaumalapau Harbor	Private and State			X
Manele/Hulopoe Beach	Private and State			X

Note: Kaena Point Satellite Tracking Station (KPSTS) has a separate de minimis agreement with the CZM Program titled "Hawaii CZM Program Federal Consistency Concurrence for United States Air Force Kaena Point Satellite Tracking Station De Minimis Activities Under CZMA. Per the October 28, 2010 memo, the Office of Planning has concurred that the activities identified on the modified list are expected to have insignificant direct or indirect (cumulative and secondary) coastal effects, and should not be subject to further review by the Hawaii CZM Program on the basis and condition that the listed de minimis activities are subject to and bound by full compliance with corresponding conditions and mitigation measures.

Naval special operations personnel consider several factors in addition to training qualifications and training requirements when selecting a site for training. The selection of a site is dependent on receiving real estate agreements/rights of entry, seasonal conditions (high surf, dangerous currents, or high winds), and site conditions (period of high public presence or protected natural resources considerations). Virtually all of the skills that the proposed training is designed to hone may be accomplished throughout all the geographic regions; however, consideration of the factors discussed

above narrow the potential sites available for training at different times of the year. Some sites and facilities support specific individual training objectives and requirements. These training activities include:

- Over-the-beach carrying a live-fire weapon, moving to a designated live-fire range
 - Proposed locations (all Federal property): JBPHH Region - Puuloa Range Training Facility, Pearl City Peninsula; Windward Oahu Region - Marine Corps Base Hawaii - Kaneohe Bay Range Training Facility.
- High-angle climbing
 - Proposed location: North Oahu Region.
- Drop zone requiring vegetation clearing
 - Proposed location: JBPHH Region - Waipio Peninsula.
- Simulated building clearance and UAS
 - Federal property within the training study area.
- Land-based drop zones and landing zones
 - Proposed locations (all Federal property): JBPHH Region - Waipio Peninsula, Pearl City Peninsula, Ford Island; North Oahu Region - Kanes (drop zone only); and West Oahu Region - Lualualei Annex.
 - Landing zones on Pearl City Peninsula would be utilized 5–12 times per year. Training would start at 1330 and run up to 2200 hours.
- Water-based drop zones
 - Proposed locations: JBPHH Region - Pearl City Peninsula and Windward Oahu Region - Marine Corps Base Hawaii (within the 500-yard security buffer surrounding the installation).

The variety of sites allows for a training progression to occur based on the trainees' skill set demonstrated as they accomplish each training skill objective. Multiple sites on Oahu and on or near other Hawaiian Islands are needed to accommodate seasonal changes, evolving skill sets, and site-specific restrictions that may occur at certain times of the year. The diversity of sites within the training study area also facilitates minimal interaction with the public and minimization of impacts on the natural environment at each potential training site through planned infrequent and random use. Additionally, infrequent use of sites helps to mitigate negative training aspects associated with trainees becoming too familiar with what to expect when they repeatedly conduct the same training at the same sites.

Each non-federal training site would be used for a maximum of 10 events per year (pending receipt of real estate agreements/right-of-entry) within the training study area. The maximum number of events across all non-federal land training sites would not exceed 330 events.

For federal property, collectively up to 265 events would occur per year. Not every non-Federal site will be used every year. However, for any particular site within a region and alternative, the maximums as described above would not be exceeded. The total training events proposed on federal property would be distributed throughout the federal property within the training study area.

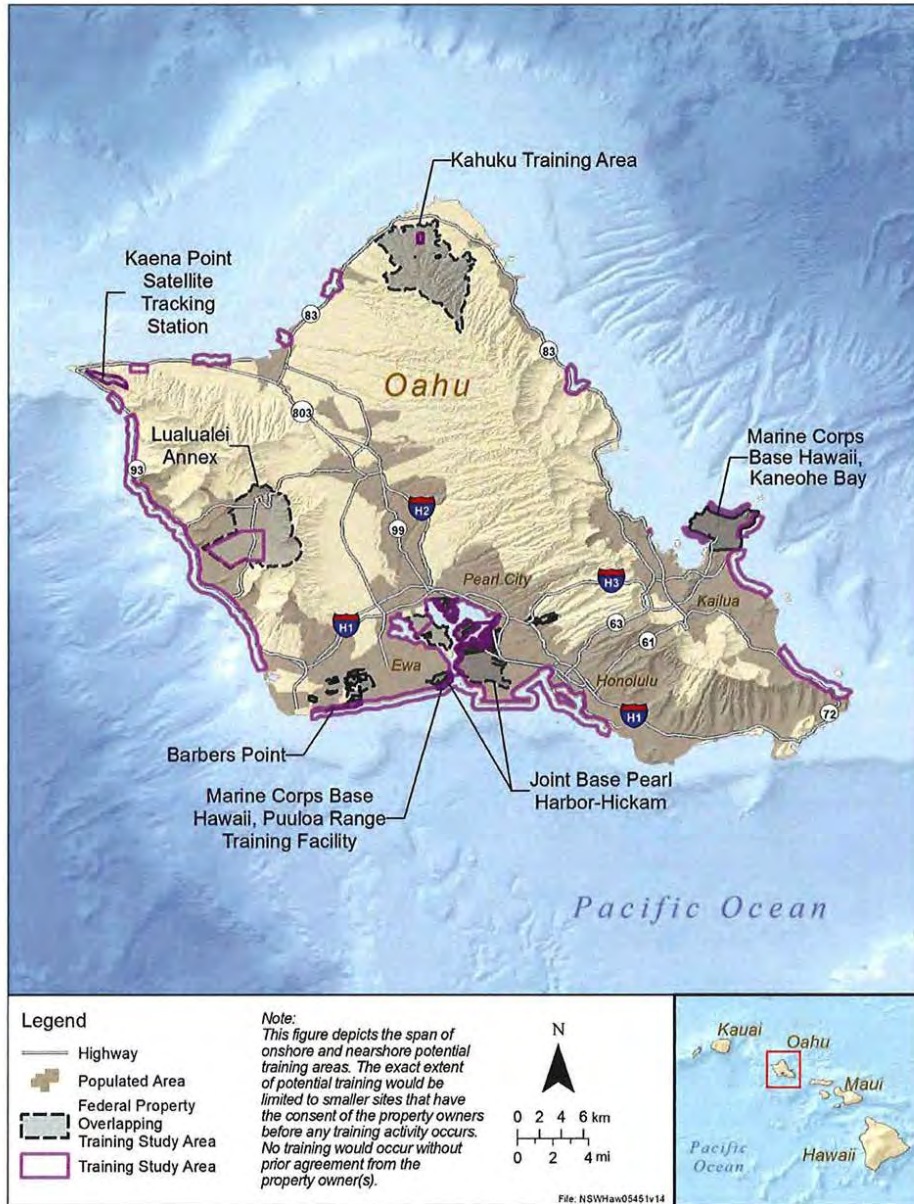


Figure 1: Oahu Island Training Study Area

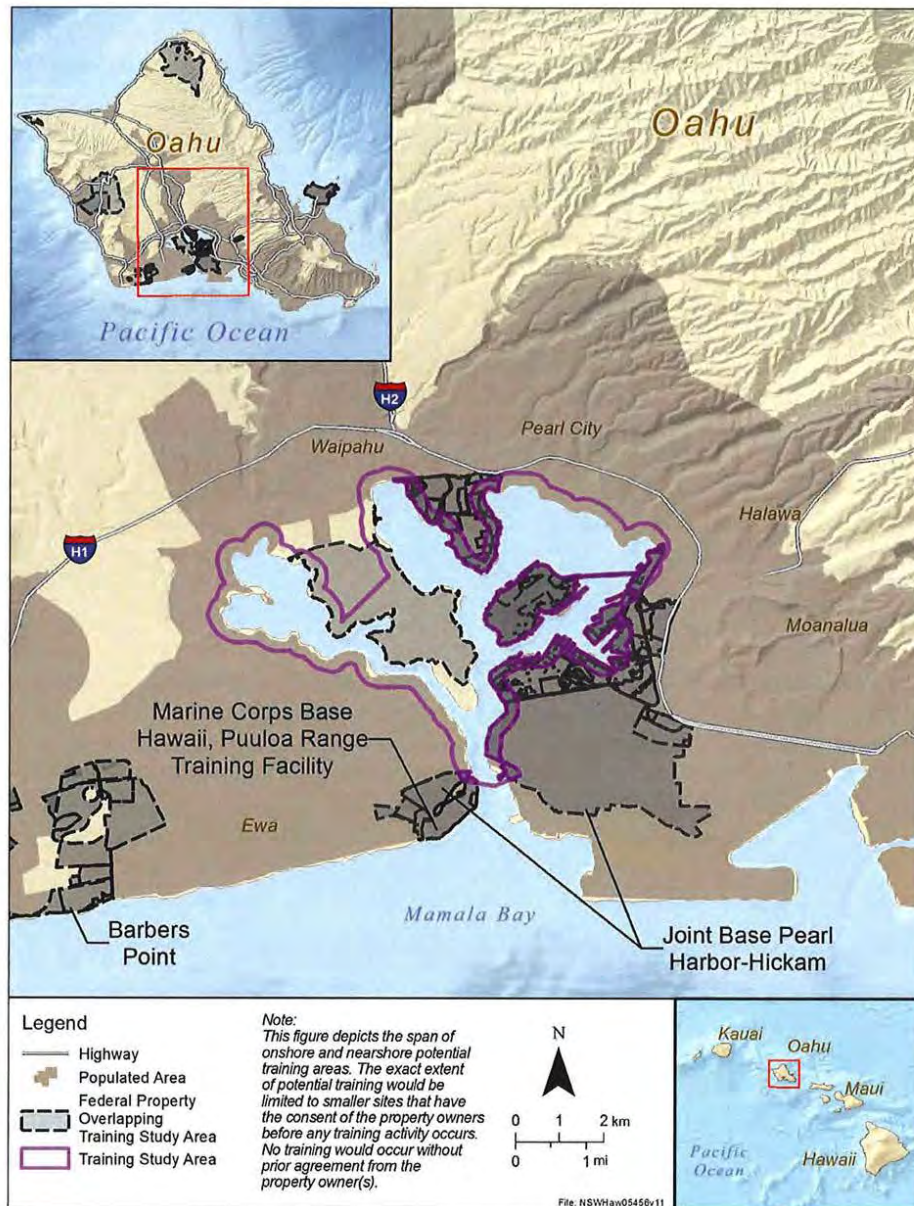


Figure 2: Oahu Joint Base Pearl Harbor-Hickam Training Study Area



Figure 3: Oahu South Region Training Study Area

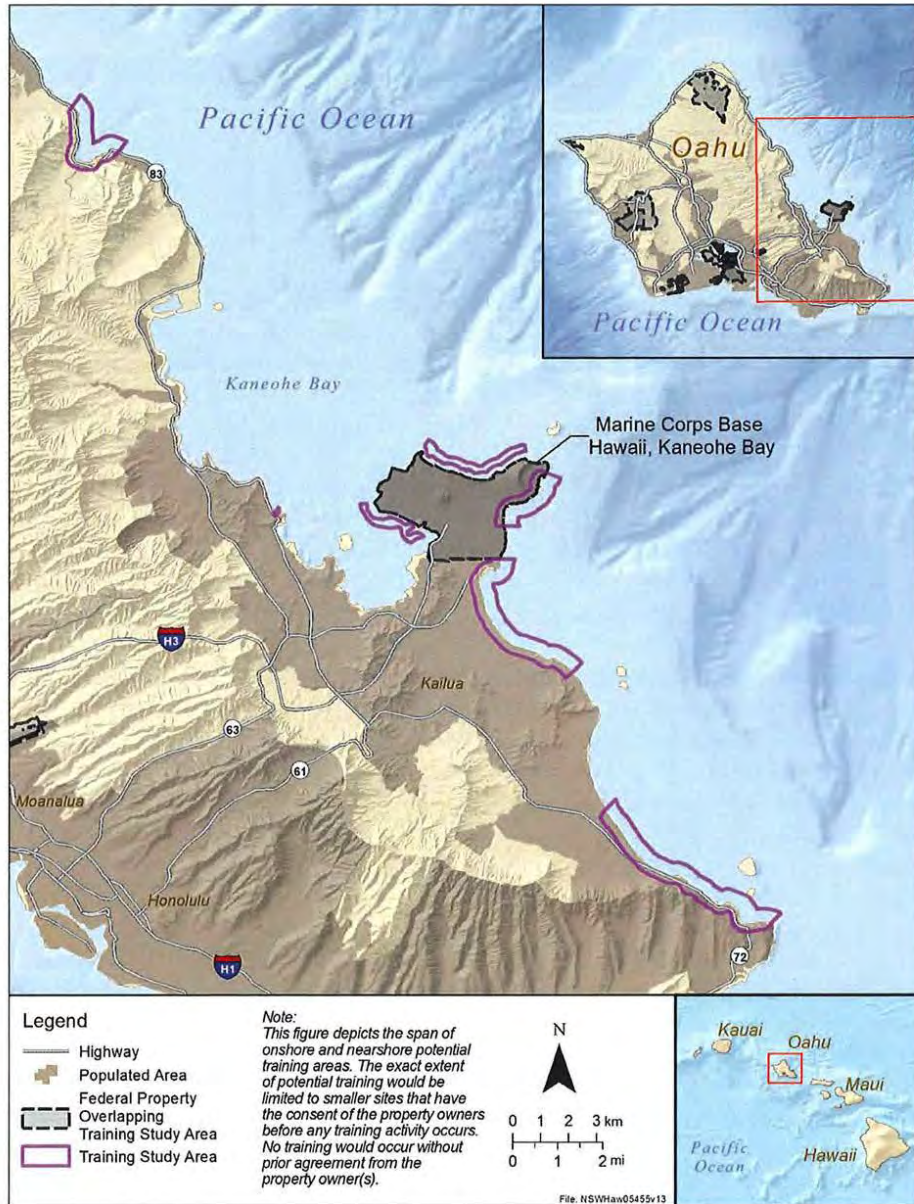


Figure 4: Oahu Windward Region Training Study Area

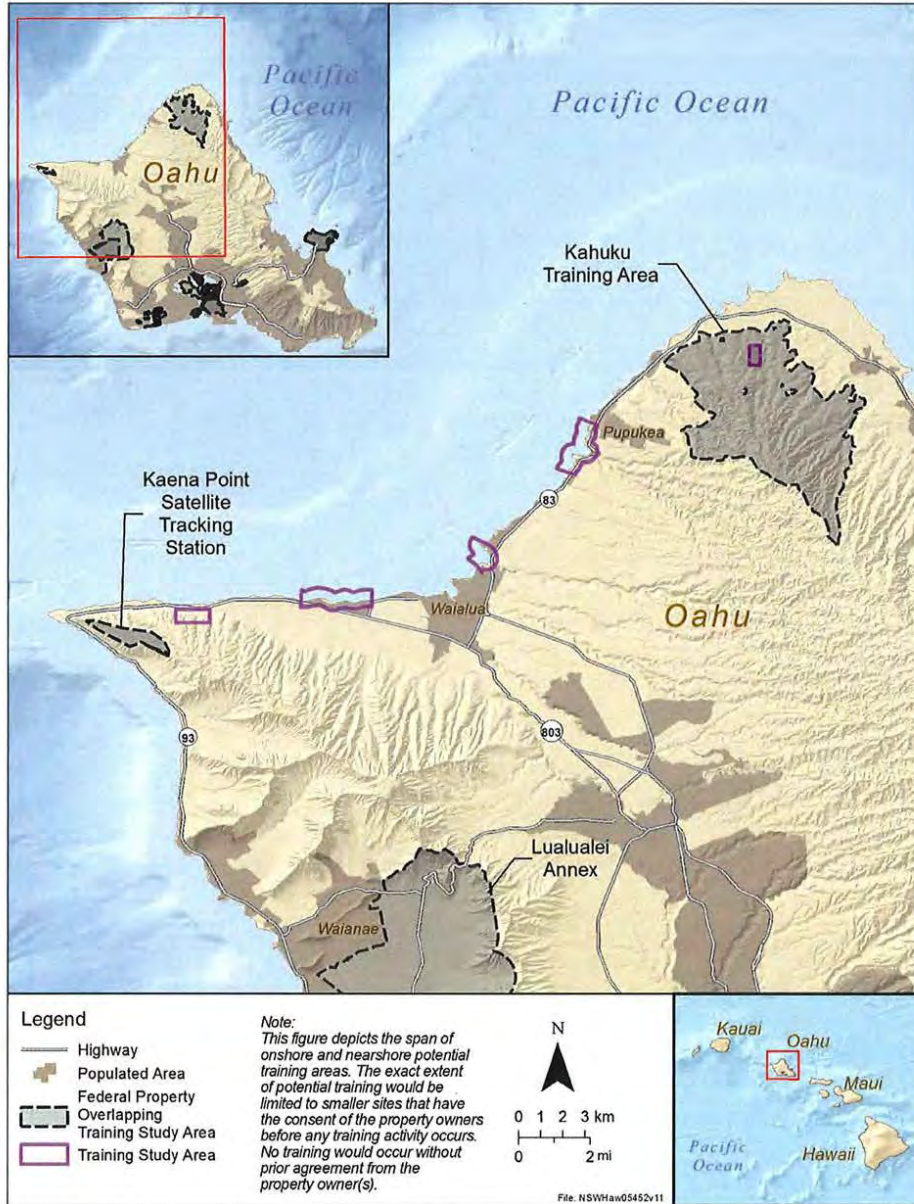


Figure 5: Oahu North Region Training Study Area

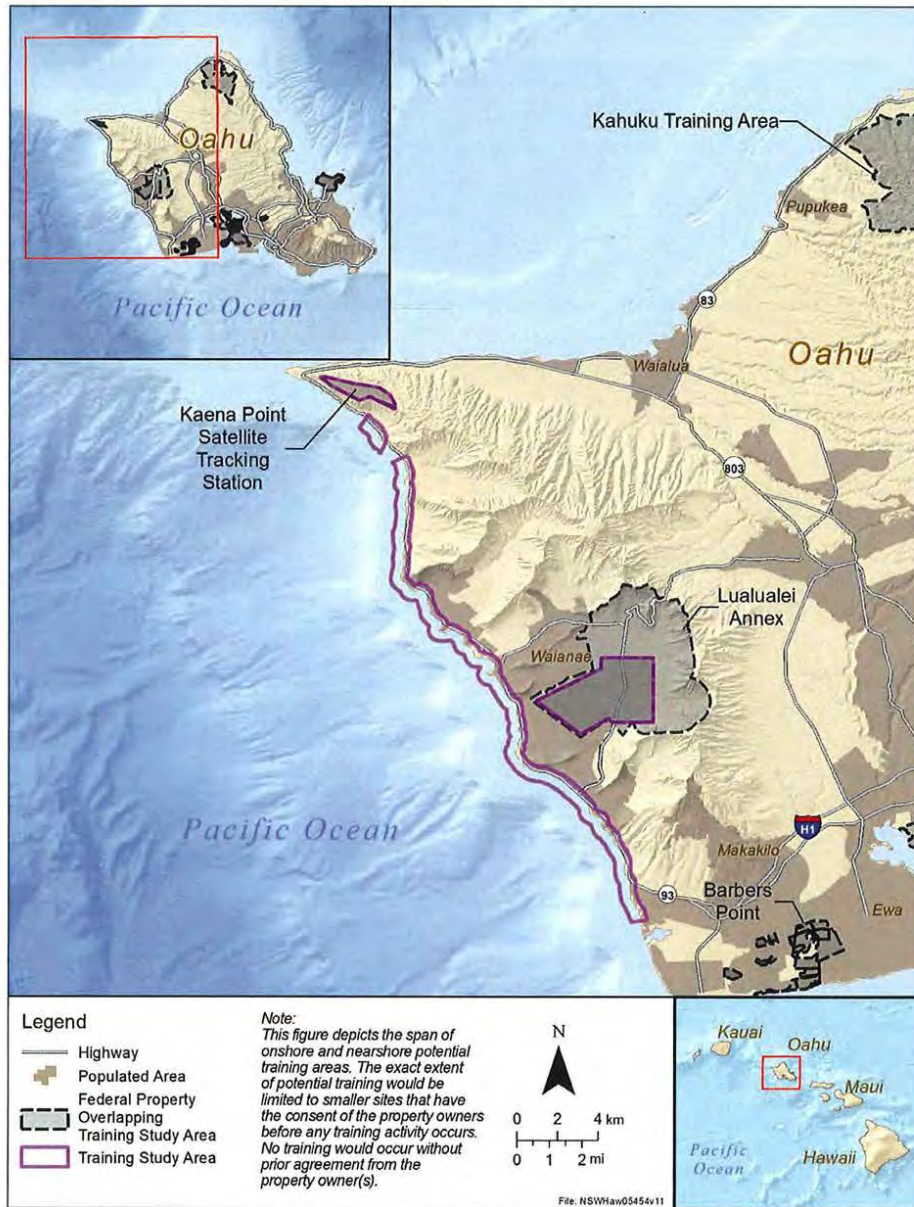


Figure 6: Oahu West Region Training Study Area

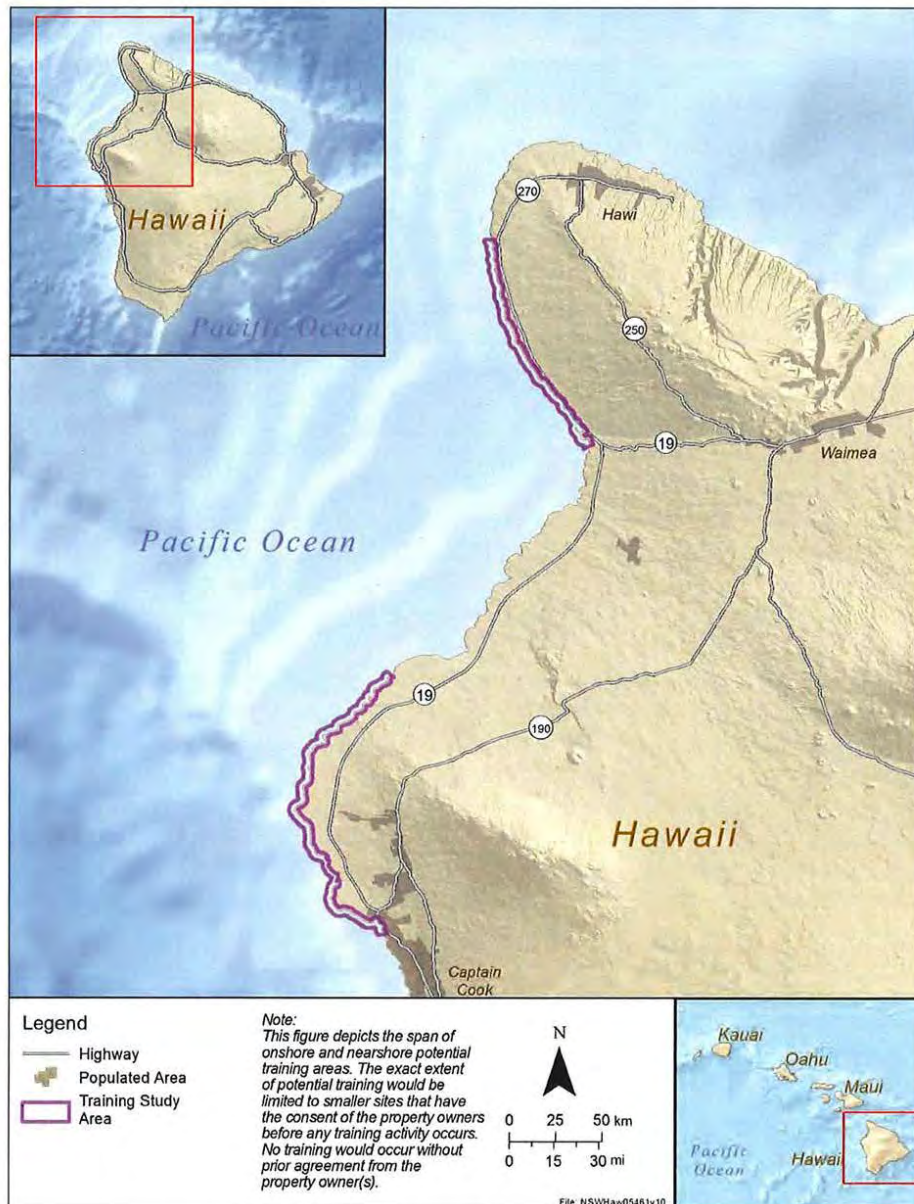


Figure 7: Island of Hawaii Training Study Area

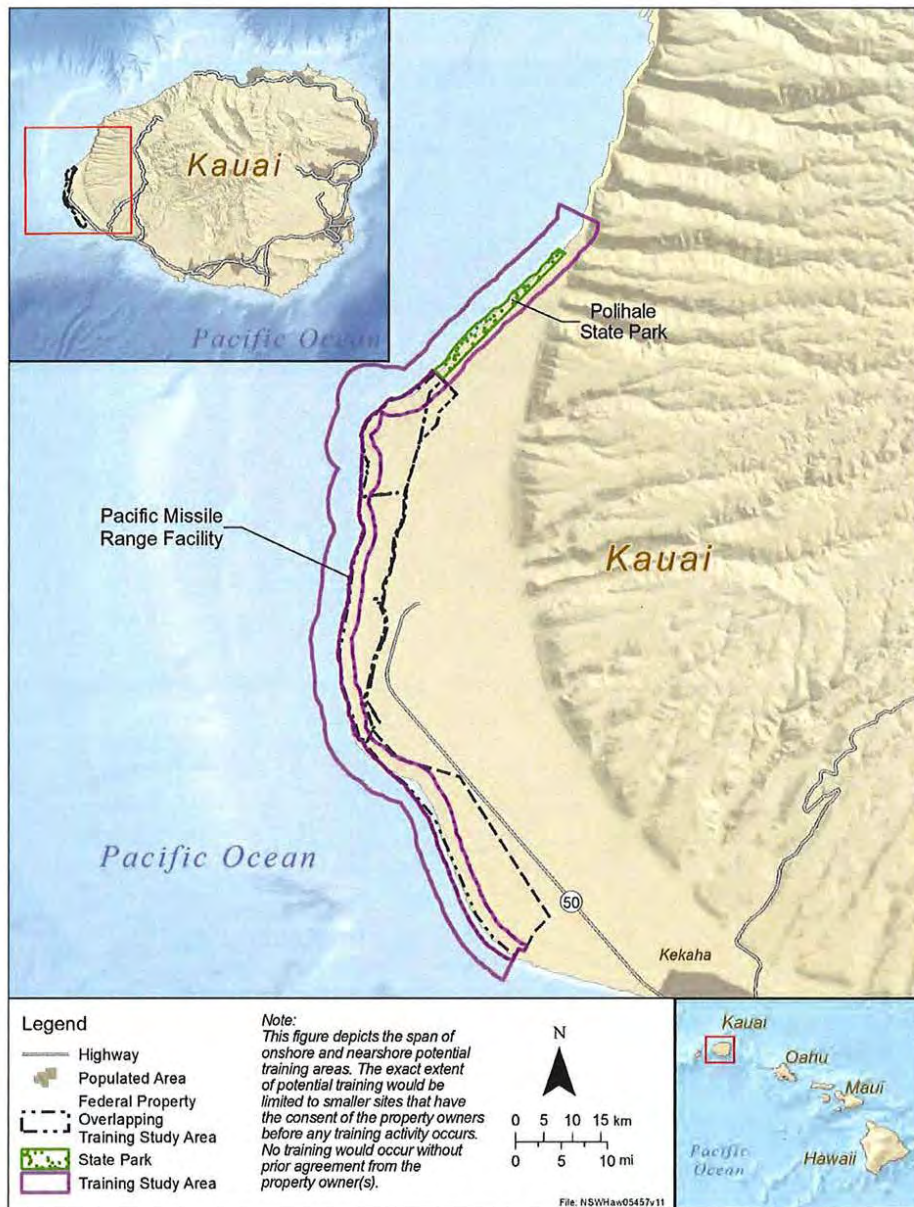


Figure 8: Kauai Training Study Area

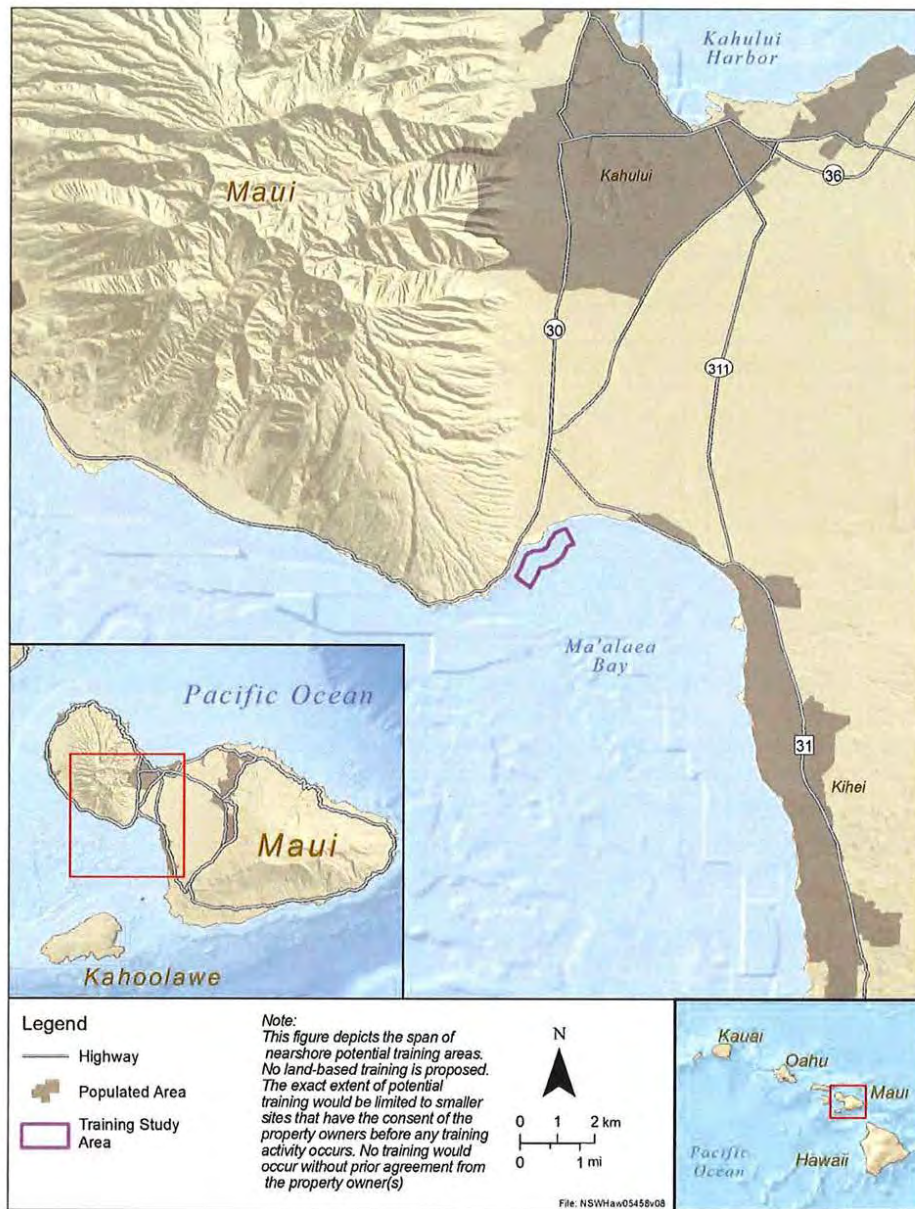


Figure 9: Maui Training Study Area



Figure 10: Lanai Training Study Area



Figure 11: Molokai Training Study Area

A.5 NATIONAL PARK SERVICE (NPS)

A.5.1 Navy Response to Questions from NPS Regarding the Proposed Naval Special Operations Training in Hawaii EA (7Dec18)

From: Zimmerman, Julie M CIV NAVFAC PAC, EV21 <julie.zimmerman@navy.mil>
Sent: Friday, December 7, 2018 3:12 PM
To: 'Zimpfer, Jeff'; margherita.parrent@socom.mil
Subject: RE: [Non-DoD Source] more questions
Attachments: National Park Service NSO HI Q&A.pdf

Aloha Jeff,

Please see attached for answers to your questions. Please let us know if we missed any or you would like to discuss further.

Thank you,
Julie

Julie M. Zimmerman
Senior NEPA Planner (EV21)
Naval Facilities Engineering Command, Pacific

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

From: Zimpfer, Jeff <jeff_zimpfer@nps.gov>
Sent: Wednesday, November 28, 2018 12:55 PM
To: Zimmerman, Julie M CIV NAVFAC PAC, EV21; Margherita Parrent
Subject: [Non-DoD Source] more questions

Aloha again Julie and Margherita,

We have a couple of more questions for you.

1. If they choose to do training activities on land in the park, what might those activities be? Do you know where in the Park they would take place? Please tell me if I am correct, I think that I recall on our phone conversation that you said before there would be activities on land in the Park you and/or the Navy would further consult with us to make sure the NPS was OK with the activities?

2. I think I also recall from our conversation that when the EA speaks about Federal Lands they mean lands owned by the military only. It is not referring to NPS lands, correct?

We will be having a meeting tomorrow morning with other Park staff to discuss potential concerns. It's likely that we will have more questions for you. Others on our team may want to discuss concerns with you over the phone.

Thanks much for helping us understand the EA better.
~Jeff

Jeff Zimpfer, Ph.D.

National Park Service
Environmental Protection Specialist
Kaloko-Honokōhau National Historical Park
73-4786 Kanalani St., #14
Kailua Kona, HI 96740
ph: 808-329-6881 x1500
fax: 808-329-2597
jeff_zimpfer@nps.gov <mailto:jeff_zimpfer@nps.gov> <http://www.nps.gov/kaho/index.htm>

The National Park Service cares for special places saved by the American people so that all may experience our heritage

National Park Service NSO HI Questions

1. **The EA has a section on "State and County Parks...3-54" I do not see a mention of National Parks. Should the section also include National Parks?**
 - a. **Response:** Yes, we should include National Park and perhaps state it is only one (need to double check that it is only one National Park).
2. **What is a submersible? It's like a submarine, correct?**
 - a. **Response:** Yes, correct.
3. **How big is a submersible?**
 - a. **Response:** The ones we are proposing to utilize vary in size up to a maximum of 45 feet in length.
4. **How many submersibles? Can you tell us how many there will be in the park at one time and how many over the course of a year?**
 - a. **Response:** Typically, one at a time and occasional up to two.
5. **How many zodiacs? Can you tell us how many there will be in the park at one time and how many over the course of a year?**
 - a. **Response:** Two per submersible. No more than two zodiacs or small boats at a time.
6. **How big are the Zodiacs? The EA says "Surface support craft includes commercial or military boats (generally in the 20–36 foot range) for open water utility operations."**
 - a. **Response:** That is their range.
7. **How many people may be in the Park at one time and how many over the course of a year?**
 - a. **Response:** None on land and in the water and on a zodiac up to 4 people each and in a submersible 6 people.
8. **Will the zodiacs land on the shoreline? If yes, where on the shoreline? People or Zodiacs will not land on the shoreline until the Navy has a right of entry agreement with the Park, correct?**
 - a. **Response:** We do not anticipate having zodiacs landing on the shoreline unless there is an emergency. Correct, people or Zodiacs would not land on the shoreline until the Navy has a right of entry agreement with the Park.
9. **If they choose to do training activities on land in the park, what might those activities be? Do you know where in the Park they would take place? Please tell me if I am correct, I think that I recall on our phone conversation that you said before there would be activities on land in the Park you and/or the Navy would further consult with us to make sure the NPS was OK with the activities?**
 - a. **Response:** No activities are planned on National Park land.
10. **I think I also recall from our conversation that when the EA speaks about Federal Lands they mean lands owned by the military only. It is not referring to NPS lands, correct?**
 - a. **Response:** Correct.

A.5.2 Navy Coordination with NPS Regarding the Proposed Naval Special Operations Training in Hawaii EA (4Sep19)

From: Zimmerman, Julie M CIV (US)
Sent: Wednesday, September 4, 2019 4:21 PM
To: Thompson, Bill <william_thompson@nps.gov>; Parrent, Margherita L CIV USSOCOM NSW (USA)
Cc: Zimpfer, Jeff <jeff_zimpfer@nps.gov>; Sallie Beavers <sallie_beavers@nps.gov>; Melia Lane-Kamahele <Melia_Lane-Kamahele@nps.gov>
Subject: RE: [Non-DoD Source] Mahalo

Aloha Bill,

Yes- received your email.

Thank you again for your time today to discuss the NSO HI project. I looked back through my email files and found a 12/7/18 email to Jeff where we answered the list of questions about the proposed training. I don't have any email correspondence after that point. In addition, I found the map where we overlaid the park boundary with the Training Study Area. As discussed on the call, NSW will exclude the overlapping areas from the proposed training.

Thank you again,
Julie

Julie M. Zimmerman
Environmental Planning Branch Supervisor (EV21)
Naval Facilities Engineering Command, Pacific

From: Thompson, Bill <william_thompson@nps.gov>
Sent: Wednesday, September 4, 2019 4:09 PM
To: Parrent, Margherita L CIV USSOCOM NAVSOC NSWG3; Zimmerman, Julie M CIV (US)
Cc: Zimpfer, Jeff <jeff_zimpfer@nps.gov>; Sallie Beavers <sallie_beavers@nps.gov>; Melia Lane-Kamahele <Melia_Lane-Kamahele@nps.gov>
Subject: [Non-DoD Source] Mahalo

Aloha Julie and Margherita,

Thank you for today's call and thank you for your decision to exclude Kaloko-Honokohau National Historical Park from the Naval Training Activities. We appreciate all that you do and your willingness to work with us. Due to issues with previous emails if you could please reply back that you received this it would be greatly appreciated.

Mahalo,
Bill

Bill Thompson
Superintendent
Kaloko-Honokohau NHP
Pu'uhonua o Honaunau NHP
(808) 329-6881 x 1201 (KAHO)
(808) 328-2326 x 1101 (PUHO)
[\[CAUTION\] https://www.nps.gov/puho/index.htm](https://www.nps.gov/puho/index.htm) [CAUTION]
[\[CAUTION\] https://www.nps.gov/kaho/index.htm](https://www.nps.gov/kaho/index.htm) [CAUTION]

"Coming together is a beginning, staying together is progress, and working together is success." – Henry Ford

On Mon, Jan 28, 2019 at 2:41 PM Thompson, Bill <william_thompson@nps.gov> wrote:

Aloha Adrienne and Margherita,

With the recent shutdown now over I wanted to reach back out to you to see if we could touch base on the exercise. I am in the office all of this week. Please advise if there's a day and time that works best for you.

Thank You,
Bill

Bill Thompson
Superintendent
Kaloko-Honokohau NHP
Pu'uhonua o Honaunau NHP
(808) 329-6881 x 1201 (KAHO)
(808) 328-2326 x 1101 (PUHO)
[\[CAUTION\] https://www.nps.gov/puho/index.htm](https://www.nps.gov/puho/index.htm) [CAUTION]
[\[CAUTION\] https://www.nps.gov/kaho/index.htm](https://www.nps.gov/kaho/index.htm) [CAUTION]

"Coming together is a beginning, staying together is progress, and working together is success." – Henry Ford

On Tue, Dec 11, 2018 at 12:51 PM Thompson, Bill <william_thompson@nps.gov> wrote:

Aloha Adrienne and Margherita,

I am interested in having a phone conversation with you about this exercise. Kaloko-Honokohau National Historical Park is a National Historic Landmark and the boundaries of the park extend a considerable distance out into the ocean. As stated in Jeff's email there are numerous cultural and natural resources on land and in the water. Our preference would be for the exercise to take place outside of our park boundary both on land and in the water. This link will take you to the park map that displays the park boundary (you may need to select brochure from the drop down for the map to display): [\[CAUTION\] https://www.nps.gov/kaho/planyourvisit/maps.htm](https://www.nps.gov/kaho/planyourvisit/maps.htm) [CAUTION]

If there is any possibility that the exercise will take place within the boundary of the park then we believe that the draft EA should describe in detail the proposed undertaking within the boundaries of Kaloko-Honokohau National Historical Park.

We are available for a call on Wednesday, December 12 between 10 and 11 a.m. or anytime on Friday, December 14.

I look forward to hearing back from you.

Thank You,
Bill

Bill Thompson
Superintendent
Kaloko-Honokohau NHP
Pu'uhonua o Honaunau NHP
(808) 329-6881 x 1201 (KAHO)
(808) 328-2326 x 1101 (PUHO)
[\[CAUTION\] https://www.nps.gov/puho/index.htm](https://www.nps.gov/puho/index.htm) [CAUTION]
[\[CAUTION\] https://www.nps.gov/kaho/index.htm](https://www.nps.gov/kaho/index.htm) [CAUTION]

"Coming together is a beginning, staying together is progress, and working together is success." – Henry Ford

On Fri, Dec 7, 2018 at 8:35 AM Zimmerman, Julie M CIV NAVFAC PAC, EV21 wrote:

Aloha Jeff,

The appropriate people to speak to would be Margherita Parrent and Adrienne Saboya of NSW. Both are cc-ed on this email.

Thank you,
Julie

Julie M. Zimmerman
Senior NEPA Planner (EV21)
Naval Facilities Engineering Command, Pacific

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

From: Zimpfer, Jeff <jeff_zimpfer@nps.gov>
Sent: Thursday, December 6, 2018 9:44 AM
To: Zimmerman, Julie M CIV NAVFAC PAC, EV21
Cc: [Margherita Parrent](#); Bill Thompson <william_thompson@nps.gov>
Subject: Re: [EXTERNAL] RE: [Non-DoD Source] ESA section 7?

Aloha Julie,

Thanks for the reply. My supervisor, Park Superintendent Bill Thompson, would like to speak with the someone at his level who is the lead for compliance for this project. Do you mind sharing that contact information with me? Our basic question is, would the Navy consider excluding the Park from their training activities? We have many sensitive cultural and natural resources that need be avoided.

~Jeff

Jeff Zimpfer, Ph.D.

National Park Service
Environmental Protection Specialist
Kaloko-Honokōhau National Historical Park
73-4786 Kanalani St., #14
Kailua Kona, HI 96740
ph: 808-329-6881 x1500
fax: 808-329-2597
jeff_zimpfer@nps.gov <mailto:jeff_zimpfer@nps.gov> [CAUTION] <http://www.nps.gov/kaho/index.htm>
[CAUTION]

The National Park Service cares for special places saved by the American people so that all may experience our heritage

A.5.3 Navy Coordination with NPS Regarding the Proposed Naval Special Operations Training in Hawaii EA – Pu'ukohola Heiau NHS and Pelekane Bay Will Not Be Affected (2Sep20)

From: Kawaiaaea, Daniel <Daniel_Kawaiaaea@nps.gov>
Sent: Wednesday, September 2, 2020 7:25 AM
To: Parrent, Margherita L CIV USSOCOM NSW (USA); Johnson, Adam M; Broward, John
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F; Gmirkin, Richard V; Arakaki, Aric; Beavers, Sallie C; Gewecke, Catherine A; Spaulding, Rick; Saboya, Adrienne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)
Subject: RE: Follow-up on Navy training - NPS

Aloha Margherita,

Thank you again for verifying and reconfirming that Pu'ukohola Heiau NHS and Pelekane Bay will not be affected by this upcoming Navy training, and was never part of the training proposal.

We greatly appreciate your reaching out to consult with us on this endeavor, and request that any future training activity planned for the Kawaihae area continue to avoid this park unit and any possible impacts the undertaking may have on the unique and significant resources found here.

Please do not hesitate to reach out to myself or our park team at any time should you have any other questions or need additional information in the future. We thank you again for the inquiry, and look forward to maintaining a close and collaborative relationship with you and our military colleagues in Hawai'i.

Malama pono -- d.k.

From: Parrent, Margherita L CIV USSOCOM NSW (USA)
Sent: Tuesday, September 1, 2020 8:38 PM
To: Johnson, Adam M <Adam_Johnson@nps.gov>; Kawaiaaea, Daniel <Daniel_Kawaiaaea@nps.gov>; Broward, John <John_Broward@nps.gov>
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>; Gewecke, Catherine A <catherine.a.gewecke@hawaii.gov>; Spaulding, Rick; Saboya, Adrienne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)
Subject: RE: [EXTERNAL] RE: Follow-up on Navy training

Aloha Adam,

Yes we can and will avoid the areas shown on the attached maps and thank you for the information regarding the coral flats, will add this information to our maps for the area as well. TO recap we are confirming that there will be no training at Pu'ukohola Heiau NHS and Pelekane Bay & coral flats . Note these two areas were never part of our proposal.

Note I've copied DAR on this email per a phoncon held with them regarding their suggestion that we consult with you.

Mahalo for the quick follow-up and should you have any additional questions please contact me.

Warmest Regards,
Margherita

Ms. Margherita Parrent
Deputy Facilities Director & Environmental Coordinator
Naval Special Warfare Group THREE

From: Johnson, Adam M <Adam_Johnson@nps.gov>
Sent: Wednesday, August 26, 2020 11:43 AM
To: Parrent, Margherita L CIV USSOCOM NSW (USA); Kawaiiaea, Daniel <Daniel_Kawaiiaea@nps.gov>; Broward, John <John_Broward@nps.gov>
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrienne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)
Subject: [Non-DoD Source] Re: [EXTERNAL] RE: Follow-up on Navy training

Hi Margherita,

Here you go. Hopefully this will work for what you need. It is a snapshot of the web map Jeff sent the link for. The map shows the park boundary in relation to Kawaihae harbor.

Best,
Adam

From: Parrent, Margherita L CIV USSOCOM NSW (USA)
Sent: Wednesday, August 26, 2020 11:03 AM
To: Johnson, Adam M <Adam_Johnson@nps.gov>; Kawaiiaea, Daniel <Daniel_Kawaiiaea@nps.gov>; Broward, John <John_Broward@nps.gov>
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrienne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)
Subject: RE: [EXTERNAL] RE: Follow-up on Navy training

Aloha Adam,

Will await your map as I tried to access via what Mr. Zimpfer sent me and am blocked from site due to our firewall.

Mahalo,
Ms. Margherita Parrent
Deputy Facilities Director & Environmental Coordinator
Naval Special Warfare Group THREE

From: Johnson, Adam M <Adam_Johnson@nps.gov>
Sent: Wednesday, August 26, 2020 10:34 AM
To: Parrent, Margherita L CIV USSOCOM NSW (USA); Kawaiiaea, Daniel <Daniel_Kawaiiaea@nps.gov>; Broward, John <John_Broward@nps.gov>
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrienne V

CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)

Subject: [Non-DoD Source] Re: [EXTERNAL] RE: Follow-up on Navy training

Hi Margherita,

I can work on one but to get you the info more quickly, the coral flats of the boat harbor is the area to the north and northwest of our red boundary line. The boat harbor starts where you see the next section of water to the northwest of the park boundary line.

Cheers,

Adam

From: Parrent, Margherita L CIV USSOCOM NSW (USA)

Sent: Wednesday, August 26, 2020 10:08 AM

To: Johnson, Adam M <Adam_Johnson@nps.gov>; Kawaiaaea, Daniel <Daniel_Kawaiaaea@nps.gov>; Broward, John <John_Broward@nps.gov>

Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrianne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)

Subject: RE: [EXTERNAL] RE: Follow-up on Navy training

Aloha Adam,

Almost there! Need one more map, a larger one showing where the park boundaries are in relation to Kawaihae boat harbor.

Mahalo,
Margherita

Ms. Margherita Parrent

Deputy Facilities Director & Environmental Coordinator
Naval Special Warfare Group THREE

From: Johnson, Adam M <Adam_Johnson@nps.gov>

Sent: Wednesday, August 26, 2020 10:03 AM

To: Parrent, Margherita L CIV USSOCOM NSW (USA); Kawaiaaea, Daniel <Daniel_Kawaiaaea@nps.gov>; Broward, John <John_Broward@nps.gov>

Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrianne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)

Subject: [Non-DoD Source] Re: [EXTERNAL] RE: Follow-up on Navy training

Hi Margherita,

I'm responding to your last email to my Superintendent (Daniel K. Kawaiaaea, Jr.) about a map with the park boundaries and Pelekane Bay. Attached is an overview of the National Historic Site boundary with different landownership and the portion of the National Historic Landmark that extends offshore into Pelekane Bay. One of our main concerns is the location of Hale o Kapuni in the waters of Pelekane Bay.

Hopefully this map suffices for what you were looking for. Let me know if anything else is needed.

Best,
Adam

From: Parrent, Margherita L CIV USSOCOM NSW (USA)
Sent: Wednesday, August 26, 2020 9:55 AM
To: Kawaiaea, Daniel <Daniel.Kawaiaea@nps.gov>; Broward, John <John.Broward@nps.gov>
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff.Zimpfer@nps.gov>; Gmirkin, Richard V <Rick.Gmirkin@nps.gov>; Arakaki, Aric <Aric.Arakaki@nps.gov>; Johnson, Adam M <Adam.Johnson@nps.gov>; Beavers, Sallie C <Sallie.Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrienne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)
Subject: RE: [EXTERNAL] RE: Follow-up on Navy training

Aloha D.K,

I am a worry wart.

Can you please send me a map of the areas of concern as I was able to find Pelekane Bay but not sure of the exact location of the Pu'ukohola Heiau NHS and want to ensure that we understand exactly where the Heiau is located, how far it extends out and where the coral flats are so that we can avoid all.

Will await the maps.

Mahalo for everyone's kokua.

Stay safe,
Margherita

Ms. Margherita Parrent
Deputy Facilities Director & Environmental Coordinator
Naval Special Warfare Group THREE

From: Kawaiaea, Daniel <Daniel.Kawaiaea@nps.gov>
Sent: Wednesday, August 26, 2020 9:28 AM
To: Parrent, Margherita L CIV USSOCOM NSW (USA); Broward, John <John.Broward@nps.gov>
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff.Zimpfer@nps.gov>; Gmirkin, Richard V <Rick.Gmirkin@nps.gov>; Arakaki, Aric <Aric.Arakaki@nps.gov>; Johnson, Adam M <Adam.Johnson@nps.gov>; Beavers, Sallie C <Sallie.Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrienne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)
Subject: [Non-DoD Source] Re: [EXTERNAL] RE: Follow-up on Navy training

Aloha Marghertia,

On behalf of Pu'ukohola Heiau NHS, we greatly appreciate the verification and clarification that no training activities are planned are will occur in Kawaihae near this NPS unit (Pelekane Bay & coral flats areas). Don't hesitate to contact me directly as desired for future notifications or any questions you may have concerning Pu'ukohola Heiau NHS.

Mahalo nui and take care.

d.k.

From: Parrent, Margherita L CIV USSOCOM NSW (USA)
Sent: Wednesday, August 26, 2020 8:13 AM
To: Broward, John <John_Broward@nps.gov>
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Kawaiaaea, Daniel <Daniel_Kawaiaaea@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Johnson, Adam M <Adam_Johnson@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>; Spaulding, Rick; Saboya, Adrienne V CIV USSOCOM NSW (USA); Rasmussen, Coral M CIV USN NAVFAC PAC PEARL HI (USA); Fong, Jeffrey W (Jeff) CIV USN NAVFAC PAC PEARL HI (USA)
Subject: [EXTERNAL] RE: Follow-up on Navy training

Aloha John,

Thank you for reaching out to us so that we can address all concerns.

No we are not planning to utilize the Ala Kahakai National Historic Trail and nor are we interested in accessing Pelekane Bay or the coral flats. Coral is something we avoid at all costs whenever possible.

Can you send me a map of the areas that are of concern as I googled them and do not believe we will be in the vicinity of the areas mentioned but it is best to have you provide us a map to ensure we are all looking at the same area.

Activities are water based ones except at Mahukona Beach Park should we receive permission from the property owner to access the land/beach area. Water activities consist of either divers up to 18 approaching the area in small boats which are less than 25 feet in length and being inserted in the water and swimming around for several hours. Divers could also arrive in one or two small submersibles between 21-50 feet, it is battery powered and the divers would leave the submersible swim around for a number of hours then go back into the submersible and leave the area. Accompanying the each submersible or group of divers are two small boats less than 25 feet in length and one boat with its crew serves as a lookout for the training while the other submersible and its crew focuses on watching the trainees. There will be a person on each boat that has marine mammal training and serves as a lookout for marine mammals. Divers would be in the area for about 2-6 hours at a time depending on the training activity.

Will await the additional clarification.

Mahalo,
Ms. Margherita Parrent
Deputy Facilities Director & Environmental Coordinator
Naval Special Warfare Group THREE

From: Broward, John <John_Broward@nps.gov>
Sent: Monday, August 24, 2020 11:25 AM
To: Parrent, Margherita L CIV USSOCOM NSW (USA)
Cc: Bigay, John C CIV USN (USA); Zimpfer, Jeff F <Jeff_Zimpfer@nps.gov>; Kawaiaaea, Daniel <Daniel_Kawaiaaea@nps.gov>; Gmirkin, Richard V <Rick_Gmirkin@nps.gov>; Arakaki, Aric <Aric_Arakaki@nps.gov>; Johnson, Adam M <Adam_Johnson@nps.gov>; Beavers, Sallie C <Sallie_Beavers@nps.gov>
Subject: [Non-DoD Source] Follow-up on Navy training

Aloha Margherita,

Thank you for the clarification regarding the training exercise utilizing the Honokohau Small Boat Harbor adjacent to Kaloko-Honokōhau National Historical Park. As stated in my earlier email, we are satisfied with your confirmation and assurance that the exercise is restricted to the Honokōhau Harbor and boat channel.

The Superintendents of two other National Park Service (NPS) sites on the west side of Hawai'i Island, Ala Kahakai National Historical Trail (ALKA) and Pu'ukoholā Heiau National Historical Site (PUHE) would like me to represent their interests with the below questions and comments. They are concerned about the lack of specificity and detailed maps, and are unable to determine any potential impacts to their NPS units. We would also like more information on the timing of this exercise.

The Ala Kahakai National Historic Trail corridor begins at Upolu Point in North Kohala and travels the west coast of Hawai'i Island, around South Point, through Hawai'i Volcanoes National Park, ending at the location of Waha'ula Heiau in Puna. Ala Kahakai NHT has concerns in regards to proposed activities and locations. Ala Kahakai staff request more detail concerning activities proposed along the broader North Kohala and North Kona shorelines.

In regards to the training near PUHE, please verify that all training activities are limited to the Kawaihae Harbor locations shown on the map and do not extend southward of the "coral flats," toward Pu'ukoholā Heiau National Historical Site and Pelekane Bay.

We request a broader map if proposed activities, including those occurring offshore, do extend towards the national park unit. This should include identification of locations and specific activities. We would also like to note that our Superintendent's compendium prohibits non-traditional water vessels from entering Pelekane Bay. This restriction is due to the historical and cultural significance of PUHE, the location of the submerged Hale o Kapuni Heiau. If you have any questions, and for future consultation related to PUHE, please contact Superintendent Daniel K. Kawaiaea, Jr. (daniel_kawaiaea@nps.gov) or Adam Johnson (adam_johnson@nps.gov).

Thank you in advance for taking the time to respond to these questions. The best way to address our questions is via email to the staff identified in the address line. I am also available by phone at the below numbers. If I am not able to answer your questions directly, I can refer you to the appropriate resource.

John Broward
Acting Superintendent
Kaloko-Honokōhau NHP
Pu'uhonua o Hōnaunau NHP
(808) 329-6881 x 1201 (KAHO)
(808) 328-2326 x 1101 (PUHO)
(808) 345-0434 Cell

Normal Duty Station:
Chief Ranger
Hawaii Volcanoes National Park
Visitor and Resource Protection
PO Box 52, Hawaii National Park, HI. 96718
Cell: (808) 345-0434
Dispatch (808) 985-6170
E-Mail: John.Broward@nps.gov

**NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII
ENVIRONMENTAL ASSESSMENT (EA)**

APPENDIX B AIR QUALITY CALCULATIONS

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APPENDIX B AIR QUALITY CALCULATIONS..... B-3

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Appendix B: Air Quality Calculations

The following is a list of assumptions used when calculating the amount of emissions that would be produced under each alternative of the Proposed Action:

1. All ground vehicle diesel engines would use ecodiesel fuel.
2. Emissions factors for small watercraft were calculated based on the August 3, 2012 boat inventory from the CBSS21 database.
3. 30-horsepower (hp) motor will only be used if the 55-hp motor is malfunctioning. Therefore, it is assumed that a 55-hp motor would be used for the entire duration. It is also assumed that the 30-hp motor would produce less emissions than the 55-hp motor.
4. Emissions factors for the 55-hp motor are based on emissions factors derived for 50-hp motors used on Combat Rubber Raiding Craft vessels.
5. MV C-Commando emissions factors are based on emissions factors for the Dolores-Chouest which were generated by the Navy and Military Sealift Command Marine Engine Fuel Consumption & Emission Calculator.
6. Assume that all ground vehicles would drive an average of 10 miles per day.
7. The sulfur content of fuel was taken from the Aircraft Environmental Support Office (AESO) Memorandum Report No. 2012-01E.
8. Emissions factors for the C-17 aircraft are assumed to be larger than AC-130 emissions factors and so flights that could use either aircraft are assumed to use a C-17.
9. Emissions factors for the C-17 aircraft were taken from AESO Memorandum Report No. 2017-13.
10. Emissions factors for the mission operations performed by the MV-22 were taken from AESO Memorandum Report No. 9965 Revision C.
11. Emissions factors for landing and takeoff cycles and cruise mode for the MV-22 were taken from AESO Memorandum Report No. 9946 Revision G.

Emissions generated under the No Action Alternative originate from activities that are covered under event-based Categorical Exclusions that were approved to support naval special operations on non-Federal lands. The Categorical Exclusions did not include an air quality impacts analysis. However, it was assumed that current equipment usage equaled approximately 45% of what is proposed for Alternative 1 except for aircraft, which were not included in the Categorical Exclusions. Therefore, using the same emissions factors for watercraft and ground vehicles, an estimate for the annual criteria pollutant emissions under the No Action Alternative was generated. The following tables (Table B-1 – Table B-9) show the emissions calculations for the No Action Alternative, Alternative 1, and Alternative 2.

Table B-1: Annual Criteria Pollutant Emissions Under the No Action Alternative

	Tons of Emissions per Year					
	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂
Ground Vehicles	0	5	3	0	0	0
Watercraft/Aircraft	205	16	500	0	0	1
Total	205	21	503	1	1	1

Notes: VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide

Table B-2: Annual Criteria Pollutant Emissions Under Alternative 1

	Tons of Emissions per Year					
	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂
Ground Vehicles	1	12	6	0	0	0
Watercraft/Aircraft	455	43	1,110	2	2	2
Total	455	55	1,117	2	2	2

Notes: VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide

Table B-3: Annual Criteria Pollutant Emissions Under Alternative 2

	Tons of Emissions per Year					
	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂
Ground Vehicles	1	12	6	0	0	0
Watercraft/Aircraft	503	48	1,228	2	2	3
Total	504	60	1,234	3	3	3

Notes: VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide

[11 x 17]

Table B-4: Annual Watercraft Emissions Under the No Action Alternative

Watercraft	Engine Power (hp)	No. Vessels	No. Engines/Vessel	Engine Use		Operations/Year	Engine Emission Factors (lb./hp-hr)						Tons of Emissions from Engines per Year					
				Hrs Idling	Hrs under Power		VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂
11-m SSC	200	1	2	0.5	10	81	0.5099	0.0177	1.2416	0.0007	0.0007	0.00006	86.73399	3.01077	211.1962	0.11907	0.11907	0.010206
	250	1	2	0.5	10	81	0.5099	0.0177	1.2416	0.0007	0.0007	0.00005	108.4175	3.76346	263.9952	0.148838	0.148838	0.010631
MV C-Commando SSC	2,000	1	2	8	2	37	0.00104	0.03587	0.001548	0.000156	0.000156	0.001827	0.07696	2.65438	0.114552	0.011514	0.011514	0.135198
				8	2	37												
Small Inflatable Boats	55	1	1	0.5	4	27	1.0199	0.0354	2.4833	0.0015	0.0015	0.00008	3.407741	0.11828	8.297326	0.005012	0.005012	0.000267
Jet Ski	235	1	1	0.5	4	41	0.2656	0.0177	0.6467	0.0004	0.0004	0.00003	5.757876	0.38371	14.01965	0.008672	0.008672	0.00065

Notes: hp = horsepower, VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide, lb. = pound, op = operation, hr = hour, LTO = Landing and Takeoff

Table B-5: Annual Emissions from Ground Vehicles Under the No Action Alternative

Vehicle	No. Vehicles	Fuel	Vehicle Model	Hours Idling/Day (avg.)	Miles Driven/Trip (avg.)	Trips/Day (avg.)	Operational Days/Year	Tons of Emissions/Year					
								VOC	CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂
Passenger Van	1	Gas	Ford 15pax	0	10	2	60	0.005166	0.074488	0.020446	0.000102	9.4E-05	0.000526
Emergency Response Vehicle	1	Gas	Chevy Suburban	0	10	4	180	0.007688	0.086681	0.027152	0.003385	0.003239	0.001673
Emergency Response Vehicle	1	Diesel	Chevy 3500	0	10	4	180	0.030995	0.446928	0.122679	0.000613	0.000564	0.003158
Pick-up Truck	3	Diesel	Chevy 3500	0	10	4	180	0.179027	0.781807	3.189084	0.030823	0.02949	0.006285
Pick-up Truck	2	Diesel	Dodge 3500	0	10	4	180	0.061989	0.893856	0.245357	0.001226	0.001128	0.006316
Passenger Van	1	Gas	Chevy 15pax	0	10	2	180	0.015497	0.223464	0.061339	0.000307	0.000282	0.001579
Stake Truck	2	Diesel	CXT	0.25	10	2	140	0.081276	0.20918	1.08562	0.038587	0.036918	0.003147
Stake Truck	1	Diesel	Dodge 5500	0	10	2	140	0.045632	0.116723	0.588413	0.022129	0.021172	0.001571

Notes: VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide.

Table B-6: Annual Watercraft and Aircraft Emissions Under Alternative 1

Watercraft	Engine Power (hp)	No. Vessels	No. Engines/Vessel	Engine Use			Engine Emission Factors (lb./hp-hr)						Tons of Emissions from Engines/Year					
				Hrs Idling	Hrs under Power	Operations/Year	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂
11-m SSC	200	1	2	0.5	10	180	0.5099	0.0177	1.2416	0.0007	0.0007	0.00006	192.7422	6.6906	469.3248	0.2646	0.2646	0.02268
	250	1	2	0.5	10	180	0.5099	0.0177	1.2416	0.0007	0.0007	0.00005	240.9278	8.36325	586.656	0.33075	0.33075	0.023625
MV C-Commando SSC	2,000	1	2	8	2	83	0.00104	0.03587	0.001548	0.000156	0.000156	0.001827	0.17264	5.95442	0.256968	0.02583	0.02583	0.303282
				8	2	83												
Small Inflatable Boats	55	1	1	0.5	4	60	1.0199	0.0354	2.4833	0.0015	0.0015	0.00008	7.572758	0.26285	18.4385	0.011138	0.011138	0.000594
Jet Ski	235	1	1	0.5	4	90	0.2656	0.0177	0.6467	0.0004	0.0004	0.00003	12.63924	0.84230	30.77484	0.019035	0.019035	0.001428
Aircraft	Fuel Use/Operation (lb./op)	No. Aircraft	No. Engines/Aircraft	Operation Type/Engine Mode	Hrs/Operation	Operations/Year	Engine Emission Factors (lb./op)						Tons of Emissions from Engines/Year					
MV-22	527	1	2	Special Personnel Insertion & Extraction	N/A	240	0.01	6.93	0.32	0.83	0.83	1.31 (per 1,000 lb. fuel)	0.0012	0.8316	0.0384	0.0996	0.0996	0.08284
	776	1	2	Landing w/Break	N/A	41	0.05	6.13	3.07	1.05	1.05	1.31 (per 1,000 lb. fuel)	0.001025	0.12567	0.062935	0.021525	0.021525	0.02084
	801	1	2	Vertical Takeoff Conversion Mode	N/A	41	0.04	6.79	2.45	1.12	1.12	1.31 (per 1,000 lb. fuel)	0.00082	0.13920	0.050225	0.02296	0.02296	0.02151
	3,820 (lb./hr)	1	2	Cruise	6	41	0.05	53.82	1.99	6	6	1.31 (per 1,000 lb. fuel)	0.00615	6.61986	0.24477	0.738	0.738	0.46986
Aircraft	Fuel Flow Rate (lb./hr)	No. Aircraft	No. Engines/Aircraft	Phase of LTO Cycle	Mins/Phase	No. LTO Cycles/Year	Engine Emission Factors (lb./1,000 lb. of fuel)						Tons of Emissions from Engines/Year					
C-17	978	1	4	Idle	15.7	9	0.37	3.76	22.7	8.75	10.67	1.06	0.000426	0.00433	0.026141	0.010076	0.012288	0.00122
	13,905	1	4	Take-off	0.4	9	0.01	35.04	0.32	0.05	0.06	1.06	4.17E-06	0.01462	0.000133	2.09E-05	2.5E-05	0.00044
	10,408	1	4	Climb out	1.2	9	0.04	32.72	0.32	1.42	2.31	1.06	3.75E-05	0.03065	0.0003	0.00133	0.002164	0.00099
	4,645	1	4	Approach	5.1	9	0.05	15.49	0.51	5.1	5.53	1.06	8.88E-05	0.02752	0.000906	0.009061	0.009825	0.00188

Notes: hp = horsepower, VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide, lb. = pound, op = operation, hr = hour, LTO = Landing and Takeoff.

Table B-7: Annual Emissions from Ground Vehicles Under Alternative 1

Vehicle	No. Vehicles	Fuel	Vehicle Model	Hrs Idling/Day (Average)	Miles Driven/Trip (avg.)	No. Trips/Day (avg.)	Operational Days/Year	Tons of Emissions/Year					
								VOC	CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂
Passenger Van	1	Gas	Ford 15pax	0	10	2	60	0.011479	0.165529	0.045437	0.000227	0.000209	0.00117
Emergency Response Vehicle	1	Gas	Chevy Suburban	0	10	4	180	0.017083	0.192625	0.060337	0.007523	0.007198	0.003718
Emergency Response Vehicle	1	Diesel	Chevy 3500	0	10	4	180	0.068877	0.993173	0.272619	0.001363	0.001254	0.007018
Pick-up Truck	3	Diesel	Chevy 3500	0	10	4	180	0.397838	1.737349	7.086854	0.068496	0.065533	0.013967
Pick-up Truck	2	Diesel	Dodge 3500	0	10	4	180	0.137754	1.986346	0.545238	0.002725	0.002507	0.014036
Passenger Van	1	Gas	Chevy 15pax	0	10	2	180	0.034438	0.496587	0.13631	0.000681	0.000627	0.003509
Stake Truck	2	Diesel	CXT	0.25	10	2	140	0.180612	0.464844	2.412488	0.085749	0.082039	0.006993
Stake Truck	1	Diesel	Dodge 5500	0	10	2	140	0.101405	0.259385	1.307585	0.049176	0.047049	0.003492

Notes: VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide.

Table B-8: Annual Watercraft and Aircraft Emissions Under Alternative 2

Watercraft	Engine Power (hp)	No. Vessels	No. Engines/Vessel	Engine Use			Engine Emission Factors (lb./hp-hr)						Tons of Emissions from Engines per Year					
				Hours Idling	Hrs under Power	Operations/Year	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂	VOC	NO _x	CO	PM _{2.5}	PM ₁₀	SO ₂
11-m SSC	200	1	2	0.5	10	200	0.5099	0.0177	1.2416	0.0007	0.0007	0.00006	214.158	7.434	521.472	0.294	0.294	0.0252
	250	1	2	0.5	10	200	0.5099	0.0177	1.2416	0.0007	0.0007	0.00005	267.6975	9.2925	651.84	0.3675	0.3675	0.02625
MV C-Commando SSC	2,000	1	2	8	2	83	0.00104	0.03587	0.001548	0.000156	0.000156	0.001827	0.17264	5.95442	0.256968	0.02583	0.02583	0.303282
				8	2	83												
Small Inflatable Boats	55	1	1	0.5	4	60	1.0199	0.0354	2.4833	0.0015	0.0015	0.00008	7.572758	0.262845	18.4385	0.011138	0.011138	0.000594
Jet Ski	235	1	1	0.5	4	90	0.2656	0.0177	0.6467	0.0004	0.0004	0.00003	12.63924	0.842299	30.77484	0.019035	0.019035	0.001428
Aircraft	Fuel Use/Operation (lb./op)	No. Aircraft	No. Engines/Aircraft	Operation Type/Engine Mode	Hrs/Operation	Operations/Year	Engine Emission Factors (lb./op)						Tons of Emissions from Engines/Year					
MV-22	527	1	2	Special Personnel Insertion & Extraction	N/A	320	0.01	6.93	0.32	0.83	0.83	1.31	0.0016	1.1088	0.0512	0.1328	0.1328	0.110459
	776	1	2	Landing w/Break	N/A	58	0.05	6.13	3.07	1.05	1.05	1.31	0.00145	0.17777	0.08903	0.03045	0.03045	0.02948
	801	1	2	Vertical Takeoff Conversion Mode	N/A	58	0.04	6.79	2.45	1.12	1.12	1.31	0.00116	0.19691	0.07105	0.03248	0.03248	0.03043
	3,820 (lb./hr)	1	2	Cruise	6	58	0.05	53.82	1.99	6	6	1.31	0.0087	9.36468	0.34626	1.044	1.044	0.66468
Aircraft	Fuel Flow Rate (lb./hr)	No. Aircraft	No. Engines/Aircraft	Phase of LTO Cycle	Mins/Phase	No. LTO Cycles/Year	Engine Emission Factors (lb./1,000 lb. of fuel)						Tons of Emissions from Engines/Year					
C-17	978	1	4	Idle	15.7	12	0.37	3.76	22.7	8.75	10.67	1.06	0.000426	0.00433	0.026141	0.010076	0.012288	0.001221
	13,905	1	4	Take-off	0.4	12	0.01	35.04	0.32	0.05	0.06	1.06	4.17E-06	0.014617	0.000133	2.09E-05	2.5E-05	0.000442
	10,408	1	4	Climb out	1.2	12	0.04	32.72	0.32	1.42	2.31	1.06	3.75E-05	0.030649	0.0003	0.00133	0.002164	0.000993
	4,645	1	4	Approach	5.1	12	0.05	15.49	0.51	5.1	5.53	1.06	8.88E-05	0.027521	0.000906	0.009061	0.009825	0.001883

Notes: hp = horsepower, VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide, lb. = pound, op = operation, hr = hour, LTO = Landing and Takeoff.

Table B-9: Annual Emissions from Ground Vehicles Under Alternative 2

Vehicle	No. Vehicles	Fuel	Vehicle Model	Hours Idling/Day (avg.)	Miles Driven/Trip (avg.)	Trips/Day (avg.)	Operational Days/Year	Tons of Emissions/Year					
								VOC	CO	NO _x	PM ₁₀	PM _{2.5}	SO ₂
Passenger Van	1	Gas	Ford 15pax	0	10	2	60	0.011479	0.165529	0.045437	0.000227	0.000209	0.00117
Emergency Response Vehicle	1	Gas	Chevy Suburban	0	10	4	180	0.017083	0.192625	0.060337	0.007523	0.007198	0.003718
Emergency Response Vehicle	1	Diesel	Chevy 3500	0	10	4	180	0.068877	0.993173	0.272619	0.001363	0.001254	0.007018
Pick-up Truck	3	Diesel	Chevy 3500	0	10	4	180	0.397838	1.737349	7.086854	0.068496	0.065533	0.013967
Pick-up Truck	2	Diesel	Dodge 3500	0	10	4	180	0.137754	1.986346	0.545238	0.002725	0.002507	0.014036
Passenger Van	1	Gas	Chevy 15pax	0	10	2	180	0.034438	0.496587	0.13631	0.000681	0.000627	0.003509
Stake Truck	2	Diesel	CXT	0.25	10	2	140	0.180612	0.464844	2.412488	0.085749	0.082039	0.006993
Stake Truck	1	Diesel	Dodge 5500	0	10	2	140	0.101405	0.259385	1.307585	0.049176	0.047049	0.003492

Notes: VOC = Volatile Organic Compound, NO_x = nitrogen oxides, CO = Carbon Monoxide, PM_{2.5} = Particulate matter less than 2.5 microns, PM₁₀ = Particulate matter less than 10 microns, SO₂ = sulfur dioxide.

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NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII ENVIRONMENTAL ASSESSMENT (EA)

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Appendix D Public Involvement Notices

This appendix is comprised of the following:

- Display Advertisement
- Office of Environmental Quality Control Notices
- Press Releases

The U.S. Naval Special Warfare Command Invites You to Participate in the Public Involvement Process for the Naval Special Operations Training in the State of Hawaii Draft Environmental Assessment



The U.S. Naval Special Warfare Command (NSWC) has prepared a Draft Environmental Assessment (EA) to analyze the potential impacts of proposed naval special operations training in the State of Hawaii. The public is encouraged to review and provide comments on the Draft EA through Dec. 10, 2018.

Concurrent with the National Environmental Policy Act (NEPA) process, the Navy is conducting National Historic Preservation Act (NHPA) Section 106 consultations regarding potential effects of the Proposed Action on historic properties. NSWC has determined that the naval special operations training is considered an Undertaking as defined in the NHPA 36 CFR §800.16(y) and is a type of activity that has the potential to cause effects on historic properties. Pursuant to 36 CFR §800.2(d), 800.3(b), and 800.3(e), the Navy is soliciting members of the public who wish to participate as consulting parties in the NHPA Section 106 process associated with this Undertaking. If interested in participating, provide written notification at the email or physical addresses below within 30 days of this notice.

<p style="text-align: center;"><u>Public Involvement</u></p> <p>The Navy invites you to review the Draft EA and welcomes your comments.</p> <p>The Draft EA is available online at https://go.usa.gov/xUnDC and at the following public libraries: Hawaii State Library (Oahu), Waimea Public Library (Kauai), Kailua-Kona Public Library (Hawaii Island), Kahului Public Library (Maui), and Molokai Public Library (Molokai).</p>	<p>Comments may be submitted by email to NFPAC-Receive@navy.mil, or by mail to:</p> <p>Naval Facilities Engineering Command Pacific Attention: Project Manager, EV21.JZ 258 Makalapa Drive, Suite 100 Pearl Harbor, HI 96860-3134</p> <p>Comments must be postmarked or received by Dec. 10, 2018, for consideration in the preparation of the Final EA.</p>
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Visit the project website at <https://go.usa.gov/xUnDC> to download the Draft EA.

Figure D-1. Display Advertisement for Draft EA Public Involvement

November 8, 2018 The Environmental Notice

STATEWIDE

Naval Special Operations Training Hawai'i--Draft EA (AFNSI)

HRS §343-5(a) Trigger	(1) Propose the use of state or county lands or the use of state or county funds (3) Propose any use within a shoreline area	
District(s)	Statewide	
TMK(s)	multiple	
Permit(s)	multiple (see document)	
Approving Agency	Department of Land and Natural Resources, State of Hawai'i Samuel Lemmo, Office of Conservation and Coastal Lands Administrator 1151 Punchbowl St, Room 131, Honolulu, HI 96813 (808) 587-0377, sam.j.lemmo@hawaii.gov	
Applicant	Naval Special Warfare Command Julie M. Zimmerman, Senior NEPA Planner (EV21), NFPAC-Receive@navy.mil Naval Facilities Engineering Command, Pacific; 258 Makalapa Drive, Ste 100, Pearl Harbor, HI, 96860-3134	
Consultant	ManTech International Corporation; 420 Stevens Ave., Suite 300, Solana Beach, CA 92075 Meagan Ostrem, Meagan.ostrem@mantech.com	
Status	Statutory 30-day public review and comment period starts. Comments are due by December 10, 2018. Please send comments to the Approving Agency and copy the applicant and the consultant.	


The United States (U.S.) Naval Special Warfare Command is the U.S. Navy's special operations force and maritime component of the U.S. Special Operations Command. The Naval Special Warfare Command has prepared this Environmental Assessment in accordance with the National Environmental Policy Act, as implemented by Council on Environmental Quality, Navy regulations, and Hawai'i Revised Statutes Chapter 343. The Proposed Action supports small unit intermediate and advanced land, maritime, and air-based training activities for naval special operations personnel. Training would occur in the nearshore waters and land-based areas on O'ahu, Island of Hawai'i, and Kaua'i, and in nearshore waters (including harbors and bays) of Maui, Moloka'i, and Lāna'i. The EA may also be viewed online at <https://go.usa.gov/xUnDC> and at the following public libraries: Hawai'i State Library (O'ahu), Waimea Public Library (Kaua'i), Kailua-Kona Public Library (Hawai'i Island), Kahului Public Library (Maui), and Moloka'i Public Library. Comments may be submitted by email as directed above, and must be postmarked or received by December 10, 2018 for consideration in preparation of the Final EA.

Figure D-2. Office of Environmental Quality Control, November 8, 2018, Notice of Public Review and Comment Period – Draft EA

December 8, 2018 The Environmental Notice

STATEWIDE

Naval Special Operations Training Hawai'i--Republished Draft EA (AFNSI)

HRS §343-5(a) Trigger	(1) Propose the use of state or county lands or the use of state or county funds (3) Propose any use within a shoreline area	
District(s)	Statewide	
TMK(s)	Multiple (see document)	
Permit(s)	Various (see document)	
Approving Agency	Department of Land and Natural Resources, State of Hawai'i Samuel Lemmo, Office of Conservation and Coastal Lands Administrator (808) 587-0377, sam.i.lemmo@hawaii.gov Kalanimoku Building, 1151 Punchbowl St, Room 131, Honolulu, HI 96813	
Applicant	U.S. Naval Special Warfare Command Julie M. Zimmerman, Senior NEPA Planner (EV21), NFPAC-Receive@navy.mil Naval Facilities Engineering Command, Pacific, 258 Makalapa Drive, Ste 100, Pearl Harbor, HI 96860-3134	
Consultant	ManTech International Corporation; 420 Stevens Ave., Suite 300, Solana Beach, CA 92075 Meagan Ostrem, Meagan.ostrem@mantech.com	
Status	The proponent is republishing the Draft EA originally published on November 8, 2018 to solicit additional comments. Another statutory 30-day public review and comment period starts. Comments are due by January 7, 2019. The Final EA must include comments from all comment periods. Please send comments to the approving agency and copy the applicant and the consultant.	

The United States (U.S.) Naval Special Warfare Command is the U.S. Navy's special operations force and maritime component of the U.S. Special Operations Command. The Naval Special Warfare Command has prepared this Environmental Assessment in accordance with the National Environmental Policy Act (as implemented by Council on Environmental Quality and Navy regulations) and Hawai'i Revised Statutes, Chapter 343. The Proposed Action supports small unit intermediate and advanced land, maritime, and air-based training activities for naval special operations personnel. Training would occur in the nearshore waters and land-based areas on O'ahu, Island of Hawai'i, and Kaua'i, and in nearshore waters (including harbors and bays) of Maui, Moloka'i, and Lāna'i.

The EA may be viewed online by clicking on the linked title to this entry or at <https://go.usa.gov/xUnDC>; it is also available at the following public libraries: Hawai'i State Library (O'ahu), Waimea Public Library (Kaua'i), Kailua-Kona Public Library (Hawai'i Island), Kahului Public Library (Maui), and Moloka'i Public Library. Comments may be submitted as noted in "Status" above.

Figure D-3. Office of Environmental Quality Control, December 8, 2018, Notice of Extension of Public Review and Comment Period – Draft EA



**COMMANDER NAVY REGION HAWAII &
NAVAL SURFACE GROUP
MIDDLE PACIFIC**

PUBLIC AFFAIRS OFFICE
850 TICONDEROGA STREET, SUITE 110
PEARL HARBOR, HAWAII 96860
PHONE: 808-473-2888 FAX: 808-473-2876
www.cnrc.navy.mil/hawaii



FOR IMMEDIATE RELEASE
POC: Kathy Isobe, 808-473-0662

Dec. 6, 2018
Release # 18-045

**NAVY EXTENDS PUBLIC COMMENT PERIOD FOR
NAVAL SPECIAL OPERATIONS TRAINING STATE OF HAWAII DRAFT
ENVIRONMENTAL ASSESSMENT**

JOINT BASE PEARL HARBOR-HICKAM, Hawaii — The Naval Special Warfare Command (NSWC) is extending the public comment period for the Naval Special Operations Training State of Hawaii Draft Environmental Assessment (EA) until Jan. 7, 2019 to allow the public more time to submit comments.

NSWC prepared the Draft EA to analyze the potential impacts of proposed naval special operations training in the State of Hawaii. NSWC invites the public to submit comments on the Proposed Action and alternatives, and the accuracy and adequacy of the Draft EA analysis.

Proposed Action:

NSWC proposes to conduct small-unit land and maritime training activities for naval special operations personnel. Training would occur in the nearshore waters and land-based areas on Oahu, Island of Hawaii, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai. The purpose of the Proposed Action is to support small unit intermediate and advanced land, maritime, and air-based training activities for naval special operations personnel.

The Draft EA is available for public review online at <https://go.usa.gov/xUnDC> and at the following locations:

- Hawaii State Library, 478 S. King St., Honolulu, HI 96813
- Waimea Public Library, 9750 Kaunualii Hwy., Waimea, HI 96796
- Kailua-Kona Public Library, 75-138 Hualalai Road, Kailua-Kona, HI 96740
- Kahului Public Library, 90 School St., Kahului, HI 96732
- Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

NSWC is accepting comments throughout the extended public comment period, which began Nov. 8, 2018, and now runs until Jan. 7, 2019. Written comments may be submitted by email to

NFPAC-Receive@navy.mil or by mail to: Naval Facilities Engineering Command Pacific
Attention: Project Manager, EV21.JZ
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

Comments must be postmarked or received online by Jan. 7, 2019, for consideration in the final EA.

-USN-

Figure D-4. Navy Press Release Announcing Extension of Public Comment Period for Draft EA



**COMMANDER NAVY REGION HAWAII &
NAVAL SURFACE GROUP
MIDDLE PACIFIC**
PUBLIC AFFAIRS OFFICE
850 TICONDEROGA STREET, SUITE 110
JBPHH, HAWAII 96860
PHONE: 808-473-2888 FAX: 808-473-2876
www.cnrc.navy.mil/hawaii



For Immediate Release
POC: Bill Doughty, 808-473-2877

Dec. 31, 2018
Release # 18-047

Navy welcomes public comments on training

JOINT BASE PEARL HARBOR-HICKAM, Hawaii — The public still has seven days to comment on the Naval Special Operations Training State of Hawaii Draft Environmental Assessment (Draft EA). The Naval Special Warfare Command (NSWC) welcomes public comments, which must be postmarked or received online by Jan. 7, 2019, for consideration in the final EA.

The Draft EA is available for public review online at <https://go.usa.gov/xUnDC> and at the following public libraries: Hawaii State, Waimea, Kailua-Kona, Kahului and Molokai.

The proposed training is essentially the same types of low-impact near-shore training Sailors have been conducting for decades around the Hawaiian Islands.

Key Elements of the Proposed Training:

- **NO shooting or explosions** – None of the training proposed in the Draft EA involves shooting weapons or detonating explosives. Loaded weapons would be carried by service members only at federal locations en route to approved weapons ranges on military property.
- **Quiet equipment** –
 - No amphibious assault craft or hovercraft would be used during the proposed training.
 - Unmanned aircraft systems (drones) would be flown only over federal property, and in accordance with a valid FAA Certificate of Authorization.
 - Submersibles as described in the Draft EA are small electric powered underwater craft similar in size to an automobile or small truck. These submersibles would not rest on coral reefs at any time, and sonars used in the submersibles are similar to commercially available fish finders.
- **Limited land and air use** – In the areas near Molokai, Lanai and Maui, only water-based training is proposed; however, land-, air-, and water-based training is proposed on Oahu, Hawaii, and Kauai. Air-based training is limited to drop zones and landing zones located on federal property. The proposed training is designed to be non-invasive in nature with the intent to leave no trace during or after a training event.

Figure D-5. Navy Press Release Providing Additional Information to the Public Regarding the Draft EA

- **Small footprint** – The proposed training is designed to be non-invasive in nature with the intent to leave no trace during or after a training event. The number of service members involved in a training event is typically no more than a few dozen and may occasionally include three or four service members from other organizations.
- **Dispersed and infrequent events** – Large coastal training areas on multiple islands were proposed in the Draft EA to provide diverse training environments and to analyze potential impacts to the environment. However, only very discreet sites within the proposed training areas would be used. Many of these discreet training sites would be used only one to two times per year, or may not be used at all, depending on specific training requirements.

The purpose of the proposed training is to build skills, experience, and confidence in our service members before deploying them around the globe. The proposed training challenges service members in a variety of warm weather locations with dynamic ocean condition, and teaches skills to avoid detection, with a goal of leaving no trace of their presence.

The comment period was originally scheduled to end December 10, 2018, but was extended to allow additional time for public input. NSWC prepared the Draft EA to analyze for potential impacts of proposed training on the environment throughout the State of Hawaii.

Written comments may be submitted by email to NFPAC-Receive@navy.mil or by mail to:
Naval Facilities Engineering Command Pacific
Attention: Project Manager, EV21.JZ
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

Only comments postmarked or received online by Jan. 7, 2019 will be considered in the final EA.

-USN-

Figure D-5. Navy Press Release Providing Additional Information to the Public Regarding the Draft EA (continued)

January 23, 2021 The Environmental Notice

COASTAL ZONE MANAGEMENT NOTICES

FEDERAL CONSISTENCY REVIEWS

The following federal actions are being reviewed for consistency with the enforceable policies of the Hawai'i Coastal Zone Management (CZM) Program, including [the CZM objectives and policies in Hawai'i Revised Statutes, Chapter 205A](#). Federal consistency, pursuant to Section 307 of the Coastal Zone Management Act of 1972 (CZMA), as amended, generally requires that federal actions, within and outside of the coastal zone, which have reasonably foreseeable effects on any coastal use (land or water) or natural resource of the coastal zone be consistent with the enforceable policies of a state's federally approved coastal management program. Federal actions include federal agency activities, federal license or permit activities, and federal financial assistance activities. This public notice is being provided in accordance with § 306(d)(14) of the CZMA, and federal regulations at 15 CFR § 930.2, § 930.42, and § 930.61. General information about federal consistency is available at the [Hawai'i CZM Program web site](#), or call (808) 587-2878.

For specific information or questions about an action listed below, contact John Nakagawa, john.d.nakagawa@hawaii.gov, (808) 587-2878. The CZM Program is required to adhere to federal review deadlines, therefore, **comments must be received by February 8, 2021**. Comments may be submitted by mail or electronic mail, to the addresses below.

Mail: Office of Planning
 Department of Business, Economic Development and Tourism
 P.O. Box 2359, Honolulu, HI 96804

Email: john.d.nakagawa@hawaii.gov


Naval Special Operations Reconnaissance Training, Ka'ena Point, O'ahu

Proposed Action: The U.S. Naval Special Warfare Command proposes to conduct special reconnaissance training at Ka'ena Point adjacent to the U.S. Air Force Kaena Point Satellite Tracking Station on State of Hawai'i owned land under the Department of Land and Natural Resources. Only special reconnaissance training activities would occur within the Kaena Point training area. Upon arrival at an area to conduct special reconnaissance training, trainees would hike to a designated observation point. Trainees are taught the techniques for conducting reconnaissance without alerting anyone to their presence or location. Trainees would remain undetected for a period of time with the goal of leaving no trace of their presence behind. This includes no vegetation trampled, no branches broken, no footprints visible, or any other indicators that they were there. Trainees would use observation techniques, following procedures, and reporting back on a scenario involving role-play with military instructors or support staff. No reconnaissance would be intentionally performed on activities other than those staged and pre-arranged for training purposes. The purpose of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a variety of locations with dynamic ocean conditions and land types in a warm-weather environment. As part of the training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. To support the intent of the training, there is no use of live-fire ammunition, explosives, off-road driving, digging, tree climbing, construction, or the building of camp fires or infrastructure. Additionally, as part of the training objective that the activities be undetected, the support personnel teach trainees that no expended equipment, human waste, or transported liquids remain on site after the training activity is completed. During a typical training event, there would be up to 20 trainees and up to 15 support personnel (or up to 35 people in total) at a training site within the training study area. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity.

Location: Ka'ena Point, O'ahu, adjacent to the U.S. Air Force Kaena Point Satellite Tracking Station
TMK(s): (1) 6-9-3: 2, 3, 4
Federal Action: Federal Agency Activity
Federal Agency: U.S. Naval Special Warfare Command

Figure D-6. Office of Environmental Quality Control, January 23, 2021, Notice of Public Review and Comment Period – Coastal Zone Management Federal Consistency Review

Notice of Availability of Finding of No Significant Impact (FONSI) for Naval Special Operations (NSO) Training in the State of Hawaii



In accordance with the National Environmental Policy Act of 1969, the U.S. Naval Special Warfare Command has prepared a Final Environmental Assessment (EA) to evaluate potential environmental impacts of conducting multi-variant land-, water-, and air-based training activities for NSO personnel in the coastal nearshore waters and selected shoreline and inland locations throughout the state of Hawaii. The proposed action will increase the tempo of current training and add new types of NSO training activities within the nearshore waters and selected shoreline and inland locations on the islands of Oahu, Kauai, and Hawaii; and in nearshore waters of the islands of Maui, Molokai, and Lanai.

Based on the analysis presented in the Final EA, and coordination with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, Hawaii State Historic Preservation Office, and Hawaii Coastal Zone Management Program office, the Navy has determined that the proposed action will not significantly impact the quality of the human environment. As a result, there is no requirement to prepare an Environmental Impact Statement.

The FONSI and Final EA are available at the following sources: the Navy website at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html; and the Hawaii State Library, Oahu; Waimea Public Library, Kauai; Kailua-Kona Public Library, Hawaii Island; Kahului Public Library, Maui; and Molokai Public Library, Molokai.

For further information contact: Naval Facilities Engineering Command Pacific (NAVFAC Pacific), Attention: John Bigay, NAVFAC Pacific Project Manager, 258 Makalapa Drive, Suite 100, Joint Base Pearl Harbor-Hickam, Hawaii 96860-3134.

Figure D-7. Display Advertisement for Notice of Availability of Final EA and Finding of No Significant Impact (FONSI)

NAVAL SPECIAL OPERATIONS TRAINING IN HAWAII ENVIRONMENTAL ASSESSMENT (EA)

APPENDIX C PUBLIC COMMENTS ON THE DRAFT EA AND RESPONSE TO PUBLIC COMMENTS

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C.1 Responses to Public Comments on the Draft EA by Resource Section

This summary is intended to illustrate the main issues received from the public during the public comment period on the Draft EA; it is not meant to capture all aspects of the comments or to serve as a legal record. Note the Hawaii Department of Land and Natural Resources (DLNR) also received several comment letters regarding the Proposed Action via email or postal mail and they were forwarded to the Navy.

Comments were primarily divided into the following resource sections: Cultural Resources, Terrestrial and Marine Biological Resources, Water Resources, Socioeconomics, Air Quality, Noise, and Cumulative Impacts. The comments also fell into the following themes: access, parks and public lands, recreation, tourism, encroachment, militarization, the National Environmental Policy Act (NEPA) process, training, hazardous materials, cultural and biological resources consultations, threatened and endangered species, marine mammals, public involvement, and selection of training areas. Summarized comments and responses are provided in Table C-1.

Naval Special Warfare Command (NSWC) published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). A copy of the Draft EA was placed in the following public libraries and it was also made available online.

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

Throughout the public comment period, the Navy received:

- **303** individual comment letters.
- **1** form letter submitted by 1,653 individuals opposing the proposed training activities on Molokai (note: counted as one comment as the text in the form letter is identical for all for all signatures).
- **1** petition opposing military training in Maui County and waters with 23 signatures (note: counted as one comment as text on the petition is identical for all signatures).
- **1** Change.Org petition with 5,710 signers opposing the Proposed Action; **328** of the petition signatures included an individual comment. Of the 5,710 signers, 3,487 were from the State of Hawaii, 2,024 were from mainland U.S. and Canada, 141 were from Europe, and 58 were from South/Central America, Asia, Africa, the Indo-Pacific region, the Middle East; 10 signers did not provide a geographic location.

- 1 petition opposing proposed training activities on Molokai with 6 signatures (note: counted as one comment as the text on the petition is identical for all signatures).
- 1 petition opposing proposed training activities on Molokai with 139 signatures (note: counted as one comment as the text on the petition is identical for all signatures).

Total Comments Received = 636 (as of January 17, 2019)

A majority of the comments received expressed opposition to the project and are against military training in Hawaii. A brief summary of the substantive comments included:

- Concerns that the coastal environment will be negatively impacted by military training.
- Concerns for the well-being of marine species, including endangered or protected species, and their habitat such as:
 - humpback whales and the Hawaiian Islands Humpback Whale National Marine Sanctuary,
 - dolphins,
 - Hawaiian monk seals and their critical habitat.
- Concerns about public access to beaches, nearshore waters and associated recreational activities, such as hiking, swimming, snorkeling, kayaking, and paddle boarding, would be negatively impacted.
- Concerns about pollution of air, water, and land, including noise pollution from military training activities.
- Concerns about unexploded ordnance and the danger it poses to the public.
- Concerns that there will be impacts on tourism and the tourism economy.
- Concerns that there will be negative impacts on the traditional Hawaiian lifestyle (including culturally significant sites).
- Concerns that historic properties have not been appropriately identified or assessed.
- Concerns about the impacts on fish populations and coral reefs.
- The current level of data and analysis provided is deemed to be insufficient to uphold a Finding of No Significant Impact.

Comment letters were received from the following elected officials and State of Hawaii agencies:

- Representative Nicole Lowen (District 6, Hawaii Island: Kailua-Kona, Holualoa, Kalaoa)
- Representative David A. Tarnas (District 7, Hawaii Island: North Kohala, South Kohala, North Kona)
- County of Hawai'i Planning Department
- County of Hawai'i Planning Department, Cultural Resources Commission

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
Opposed or in Favor of the Proposed Action without Substantive Comments		
ID#	General Comment	Response
0.a	Commenter is in favor of or indifferent to the Proposed Action and provides no other specific or substantive comments.	Thank you for your comment and participating in the NEPA process. Your comment has been received and is included in Appendix C (Public Comments and Responses).
0.b	Commenter is against the Proposed Action and provides no other specific or substantive comments.	Thank you for your comment and participating in the NEPA process. Your comment has been received and is included in Appendix C (Public Comments and Responses).
Purpose and Need/Description of the Proposed Action		
1.a	Opposes increasing Navy presence in Hawaii.	This concern is duly noted. Please note that the increased training requirement is in accordance with the NSWC meeting its Title 10 U.S. Code Section 167 mandate as discussed in Chapter 1, Section 1.3 (Purpose of and Need for the Proposed Action) in the Final EA.
1.b	Stop military expansion.	The concern about military expansion is outside the scope of the project. However, for clarification and as discussed in the Final EA, Chapter 1, Section 1.1 (Introduction), naval special operations personnel have been training in certain areas of the State of Hawaii for decades. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces.
1.c	General opposition to the Proposed Action (e.g., "I do not support the Proposed Action.")	This concern is duly noted. Please note that the proposed training is in accordance with the NSWC meeting its Title 10 U.S. Code Section 167 mandate.
1.d	General support for the Proposed Action.	Thank you for your comment and participating in the NEPA process. Your comment has been received and is included in Appendix C (Comments and Responses).
1.e	There is a lack of clarity surrounding the term "support personnel" and what exactly they do.	Support personnel are described in Sections 2.1.2 (Water-Based Training), 2.1.3 (Land-Based Training Activities), and 2.1.4 (Air-Based Training Activities) of the Draft and Final EAs. Support personnel include roles such as instructors, oversight, evaluators, medical, and safety lookouts. Support personnel teach and evaluate trainees when training activities are underway, and are responsible for the safety and oversight of trainees participating in the activity. Support personnel also provide emergency response services if needed during a training activity by being present near a training site in an unmarked parked vehicle.
1.f	There is not sufficient data provided or analysis conducted to uphold a Finding of No Significant Impact.	The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules [HAR] Section 11-200-12 and 40 Code of Federal Regulations [CFR] Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft EA, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and State Historic Preservation Officer (SHPO), coordination with the Hawaii

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		DLNR, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.
NEPA Process/Public Involvement		
2.a	Draft EA makes broad statements and conclusions about impacts without providing supporting citations to relevant scientific studies.	The Draft and Final EAs have over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document.
2.b	This should be an EIS due to increase in training and size of study area.	The “increase in training” and “size of study area” are not what triggers the need to conduct an Environmental Impact Statement (EIS). An EIS is prepared when an agency determines that a proposed action may significantly affect the quality of the environment.
2.c	Lack of supporting documentation.	The Draft and Final EAs have over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document.
2.d	Concerns for the wording "may affect but not adversely affect."	The Navy consulted with the USFWS and the NMFS to assess the potential impacts of the proposed training on ESA-listed terrestrial and marine species and associated critical habitat. The terminology used within the Draft and Final EAs to document the potential effects of the proposed training is consistent with the Endangered Species Act (16 U.S. Code Section 1531 et seq.).
2.e	There should be an EIS due to the likelihood of significant adverse impacts on biological resources, cultural resources, and the public.	The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (HAR Section 11-200-12 and 40 CFR Section 1508). The Draft EA anticipated a FONSI. Based on the analysis presented in the Draft and Final EAs; consultations with the USFWS, NMFS, Hawaii Office of Planning – Coastal Zone Management Program, and Hawaii SHPO; coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an EIS would not be required.
2.f	EA is vague and does not outline any plan for implementation of chosen alternative.	Chapter 2 (Proposed Action and Alternatives) of the Draft and Final EAs describes the Proposed Action and specifies how it would be implemented. In particular, Section 2.1 describes the proposed training; Tables 2-2, 2-3, 2-4, and 2-5 describe equipment to be used, lays out the regions where the various types of training would occur, and describe the maximum frequency of training. Section 2.5 (Alternatives Development), identifies Alternative 2 as the Preferred Alternative; and Section 2.6 (Best Management Practices and Standard Operating Procedures) describes practices and procedures to avoid, minimize, or reduce effects to the environment. Details of implementation as they relate to environmental consequences are provided in Chapter 3 (Affected Environment and Environmental Consequences) of the

Table C-1. Responses to Public Comments by Resource Section

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		Draft and Final EAs. Training would be conducted only after the completion of the NEPA process and rights of entry or other real estate agreements are obtained. The use of specific training sites is contingent on receiving appropriate real estate approvals (Section 2.2).
2.g	Supporting documentation is outdated.	The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to relevant and current scientific studies that provide the basis for the statements and conclusions contained within the document.
2.h	This DEA did not follow all required regulations or receive all required permits.	Section 5.1 (Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions) and Table 5-1 (Principal Federal and State Laws Applicable to the Proposed Action) provide a summary of the compliance status for applicable laws and regulations. Site specific real estate agreements would be obtained prior to conducting training in areas where consent is needed. All training would be conducted in accordance with natural resource management plans applicable to the landownership: for the Navy-owned lands (e.g., Integrated Natural Resource Management Plans); for State or County lands, management plans would be followed; and private lands would be subject to right-of-entry permits, or other real estate agreements. At the time of the Draft EA, some consultations had begun, and other consultations were planned but had not yet occurred. Consultations have since occurred and are completed with the USFWS; NMFS; State of Hawaii Office of Planning, Coastal Zone Management Program; and the Hawaii SHPO. Please see Appendix A (Agency Correspondence) of the Final EA for associated correspondence and consultation documents.
Hawaii Revised Statutes (HRS) Chapter 343/Hawaii NEPA		
3.a	This DEA fails to meet HEPA guidelines.	NSWC prepared the EA in accordance with the NEPA, as implemented by the Council on Environmental Quality (CEQ) Regulations, Navy regulations, and Hawaii Revised Statutes (HRS) 343. The Navy followed HAR Section 11-200, and included the contents specified in Section 11-200.1.
Alternatives		
4.a	No Action Alternative is not sufficiently described.	The No Action Alternative is described in Section 2.5.1 (No Action Alternative) and training activities and locations are summarized in Table 2-3 (Proposed Training Activity by Alternative and Region). Detailed descriptions of the training activities included in the No Action Alternative are described in Section 2.1.1 (Training Activities). Under the No Action Alternative NSWC would conduct 110 events/year. Baseline training activities conducted in Hawaii over the past decades would continue at the same level as currently scheduled, with the most current training activities being those approved under event-based Categorical Exclusions, as applicable.
4.b	Need for proposed alternatives is not defined clearly in the EA.	The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. The current limited number of sites available to trainees results in repeated use of sites and undue familiarity with the training scenarios, thus limiting the quality of the training. The restricted number of sites are not considered sufficiently varied and diverse to support persistent long-term training requirements. Training must be varied and diverse, and as realistic as possible, to prepare

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		U.S. service members to achieve their mission and ensure their success and survival when deploying on missions. Naval special operations personnel must be ready for a variety of military operations—from large-scale conflict to maritime security and humanitarian assistance/disaster relief—to respond to the dynamic, social, political, economic, and environmental issues that may arise. The need of the Proposed Action is to meet requirements under 10 U.S. Code Section 167 for the Commander, U.S. Special Operations Command to provide combat-ready forces.
4.c	Request for a time limit to be set on proposed alternatives, after which the need for these proposed training events must be reevaluated.	There is no time limit or expiration date associated with EAs. The document and analysis remain active until there is a change, which would prompt another review. If the change is substantive, then a supplement or new environmental assessment may be prepared. For example, a trigger leading to a supplement or new document could be a newly listed critical habitat or an endangered species, substantial increases in training frequency, or new training activities.
4.d	Support for the No Action Alternative.	Thank you for your comment and participating in the NEPA process. Your comment has been received and included.
Location		
5.a	It is unclear how training sites were selected.	As described in Chapter 2 of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Not all sites within the training study area would be utilized over a 1-year period. Under the Preferred Alternative (Alternative 2), training would occur up to 10 events at an individual non-federal training site/year (maximum total of events on all non-federal sites would be 330 events) and up to 265 events of training on Federal property per year (see Table 2-4 in the Final EA).
5.b	The Navy has enough Navy and military land to train on.	Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. A critical factor of this type of training is navigating the “unknown” when completing a

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.
5.c	The use of state owned harbors is not explained.	State-owned harbors are open public harbors. The water-based training described in the Draft and Final EAs could occur in those harbors, as well as any other potential waterway within the study area. Where necessary, an agreement with local authorities would be secured prior to conducting any training.
5.d	The Navy should choose less densely populated areas for training. The military should be separate from the public.	NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.
5.e	Parks should not be used for military training.	The essence of the proposed training is similar to hiking, swimming, and diving with the added intention that trainees remain undetected and leaving no trace of their presence. To conduct activities in State or County parks, NSWC will coordinate with and obtain right-of-entry or appropriate real estate agreements, as is required, prior to the use of specified public lands.
5.f	Generally opposes all military activities in the Kohala Coast area.	NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts to the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		<p>of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.</p> <p>As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.</p>
5.g	Why choose Hawaii over "empty" areas on the U.S. mainland/take military activities out of Hawaii.	<p>During the development of the alternatives, NSWC considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate requirements prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 (Training Area Screening Factors) are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.</p>
5.h	General opposition to all military training in Hawaii due to negative impacts on the environment.	<p>As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event.</p> <p>Based on the analysis in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs, environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Section 2.1 and Table 2-4 of the Draft and Final EAs). Overall, the non-invasive nature of the naval special operations training activities (e.g., no live-fire, no construction, no digging, no fires, no human waste) would have minimal effects on the environment because of the short duration, infrequency of occurrence, and low intensity of the proposed training activities. Because the goal of training is for the trainees to be in the field undetected, the environment would be minimally disturbed and materials (e.g., gear and trash) would not be left behind.</p>

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		As analyzed in Chapter 3 of the Draft and Final EAs, no significant impacts would occur with implementation of the Preferred Alternative (Alternative 2). NSWC would also conduct training in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, <i>Navy Safety and Occupational Health Program Manual</i> (2011); see Section 2.6 (Best Management Practices and Standard Operating Procedures). Training activities would be consistent with management objectives of individual sites, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.
5.i	Concerns for transparency about how many operations are taking place at each site.	Under the Preferred Alternative (Alternative 2), training would occur up to 10 events at an individual non-federal training site/year (maximum total of events on all non-federal sites would be 330 events) and up to 265 events of training on Federal property per year (see Table 2-4 of the Draft and Final EAs). Not all sites within the training study area would be utilized over a 1-year period. All training events would be conducted in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, <i>Navy Safety and Occupational Health Program Manual</i> (2011); see Section 2.6 (Best Management Practices and Standard Operating Procedures). The Proposed Action would be reevaluated under NEPA if the scope of the Proposed Action or training activities change.
5.j	Locations of the Proposed Actions are not clearly identified.	The purple area depicted on the maps in the Draft and Final EAs is a study area. Training would only occur on lands where there is a right-of-entry or other real estate agreement with a willing property owner or property manager and on military properties identified on the map. NSWC conducted an extensive search for sites within the training study area that meet its training requirements and minimize or avoid impacts the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.
5.k	Request for Molokai to be taken out as one of the proposed training areas.	<p>Training on the Island of Molokai would only occur in two water-based training study areas where a right-of-entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, proposed training is limited to water-based training activities at the two harbor areas. The purple area depicted on the maps in the Draft and Final EAs is a study area.</p> <p>Please note that NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts to the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.</p> <p>As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Based upon discussions with representatives from Molokai during teleconference calls on August 13, October 22, and October 29, 2020, the Navy reduced the training study area depicted in the Draft EA to two smaller areas along the southern coast of Molokai (see Figure 1-12 of the Final EA.</p>
Proposed Training Activities		
6.a	Will aircraft be utilizing local airports.	The Proposed Action does not include the use of local airports.
6.b	Request for information on how many flights and when the flights will occur.	As stated in Table 2-5 (Proposed Air-Based Training by Alternative) in the Draft and Final EAs, there would be a total of 70 air-based training events which include the use of aircraft with a total of 360 annual hours of aircraft operations under the Preferred Alternative (Alternative 2). Section 2.1.4 (Air-Based Training Activities) provides additional details on drop zone, landing zone, and unmanned aircraft system training activities.

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COMMENTS BY RESOURCE SECTION		
6.c	Clarify what "discreet exercises" are.	The term "discreet activities" as used in the Executive Summary and Section 1.1 (Introduction) was intended to imply that the training activities may be conducted as a single independent activity (i.e., only swimmer/diver activity), as opposed to in combination with other activities (i.e., swimmer/diver activity combined with trainees moving over the beach). The sentence has been revised.
6.d	Impacts of sonar to humans.	As stated in Section 3.3 (Biological Resources) of the Draft and Final EAs, submersibles use a sonar device to report depths to aid in navigation during a training activity. These devices have similar specifications to commercially available "fish finders" and other hand-held sonar devices, which typically generate frequencies over 200 kilohertz (kHz) and source levels less than 160 decibels referenced to 1 micropascal (dB re 1 µPa). Devices with these specifications are considered <i>de minimis</i> sources of sound in the water. No other types of sonar are proposed.
6.e	Concerns of high angle climbing occurring on highly erodible cliffs.	High-angle climbing activities would only occur on rock faces in the North Oahu Region at a location actively used for rock climbing. There would be no activities on cliffs to cause erosion and no new placements of drilled anchoring systems.
6.f	Impacts of training activities will go beyond what is identified in the DEA.	Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA).
6.g	Training activities will impact resources not identified in the DEA.	As described in Chapter 3 (Affected Environment and Environmental Consequences), all potentially relevant environmental resource areas were initially considered for analysis in the Draft and Final EAs. In compliance with NEPA, CEQ, and 32 CFR Part 775 guidelines, the discussion of the affected environment (i.e., existing conditions) focuses only on those resource areas potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.
6.h	Ensure all part of the emergency response plans are reviewed and practiced thoroughly prior to the exercises.	As described in Section 2.1.1 (Training Activities), training events are the result of extensive advanced planning. Support personnel include safety personnel who maintain safety buffers, occupy emergency response vehicles and provide medical support when necessary. During training events, support personnel are responsible for the safety and oversight of trainees participating in the activity. The support personnel continually evaluate the training scenario and employ standard operating procedures to ensure that training activities are isolated and remain safe (Section 2.1.3). In addition, Navy policy requires that training activities ensure the safety and health of personnel and the public (Section 3.6.2, Public Health and Safety).

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6.i	Concerned about the use of live-fire munitions.	The Proposed Action does not include the use of live-fire weapons or ammunition. However, in three DoD properties (Puuloa Range Training Facility, Pearl City Peninsula, and Marine Corps Base Hawaii – Kaneohe Bay Range Training Facility), actual weapons could be carried by trainees to existing live-fire training ranges. These three locations are within DoD property with limited and restricted public access and are authorized live-fire training areas. To further ensure public safety in all other areas of the training study area, trainees would not carry loaded weapons and explosives are not used during training events.
6.j	Extent of the proposed training activities has not been adequately communicated to stakeholders in the study area.	<p>CEQ regulations implementing NEPA (40 CFR Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State of Hawaii regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin <i>The Environmental Notice</i> (HAR Section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in <i>The Environmental Notice</i>, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). Copies of the Draft EA were placed in public libraries and made available online.</p> <ul style="list-style-type: none"> • Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813 • Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796 • Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740 • Maui: Kahului Public Library, 90 School St, Kahului, HI 96732 • Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748 <p>Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in <i>The Environmental Notice</i> on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.</p>
6.k	This type of training does not prepare personnel for real world combat scenarios.	The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. The current limited number of sites available to trainees results in repeated use of sites and undue familiarity with the training scenarios, thus limiting the quality of the training. The restricted number of sites are not considered sufficiently varied and diverse to support persistent long-term training requirements. Training must be varied and diverse, and as realistic as possible, to prepare U.S. service members to achieve their mission and ensure their success and survival when deploying on missions. Naval special operations personnel must be ready for a variety of military operations—from large-scale conflict to maritime security and humanitarian assistance/disaster relief—to respond to the dynamic, social, political, economic, and environmental issues that may arise.

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		The need of the Proposed Action is to meet requirements under 10 U.S. Code Section 167 for the Commander, U.S. Special Operations Command to provide combat-ready forces.
Agency Coordination		
7.a	Consultations with USFWS and NMFS.	As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine and terrestrial biological these resources with implementation of the Proposed Action. The Navy has completed consultations with the USFWS and NMFS for the Preferred Alternative, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.
7.b	Questioning why there were no agency consultations whatsoever (named others than USFWS and NMFS, including SHPO).	At the time of the Draft EA, some consultations had begun, and other consultations were planned but had not yet occurred. Consultations have since been completed with the USFWS; NMFS; State of Hawaii Office of Planning, Coastal Zone Management Program; and the Hawaii SHPO. Please see Appendix A (Agency Correspondence) of the Final EA for associated correspondence and consultation documents.
7.c	Were the Governor and all mayors contacted?	At the time of the Draft EA, some communication had been initiated. Following the publication of the Draft EA NSWC met with and coordinated with State and County officials and agencies. Please refer to Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) and Appendix A (Agency Correspondence) of the Final EA.
7.d	Hawaii County was not consulted and has not been formally notified via the distribution list for the Proposed Action.	At the time of the Draft EA, some communication had been initiated. Following the publication of the Draft EA NSWC has met with and coordinated with State and County officials and agencies. In addition, the Navy has responded to two comment letters submitted by the County of Hawaii Planning Department. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination), Appendix A (Agency Correspondence) and Appendix C (Public Comments and Responses) of the Final EA.
7.e	Request for consultation with Hawaii County Planning Department.	Following the publication of the Draft EA, NSWC met and coordinated with representatives of the Planning Department on February 7, 2019. In addition, the Navy has responded to two comment letters submitted by the County of Hawaii Planning Department. Please see Appendix C (Public Comments and Responses) of the Final EA. Following the completion of the NEPA process and the anticipated receipt of a FONSI, NSWC will coordinate further with State and County agencies and property owners regarding sites proposed as training locations. Training would be conducted only after obtaining rights of entry or other real estate agreements, prior to conducting training when required.
Indirect/Cumulative Impacts		
8.a.	Area of Potential Effect (APE) is too large, should be more focused and address smaller specific areas.	The purple area depicted on the maps in the Draft and Final EAs is a training study area or APE. The study area/APE is larger than the actual area that would be used for the proposed training due to the application of buffer areas, and would be limited to smaller sites on federal land and on state and private land - the latter of which would have the consent of property owners before training activity occurs.

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
8.b.	General disbelief that the Proposed Action and military activities will not have an impact on the resources areas.	<p>The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA). The activities are similar to those conducted by the general public.</p> <p>As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers and receipt of rights-of-entry or other real estate agreements.</p>
Geology and Soils		
9.a	Need discussion of soils and beach materials, corals, mineral resources, single source aquifers and human interactions with these sources, and geological and cultural heritage sites.	<p>The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. There would be no impacts to mineral resources and single-source aquifers as the proposed training activities would be similar to those of the general public walking on a beach. As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral and trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action or typical public users of the nearshore environment and beaches.</p>

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
Water Resources		
10.a	Chemicals would be released into the water (i.e. oil, gas, and other hydrocarbons) need to be addressed.	The proposed submersible and unmanned underwater vehicles (UUVs) are battery powered. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the ground, or in air, in accordance with the Navy’s Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.
10.b	Military activities will produce water pollution.	The proposed training activities do not involve changes to drainage patterns or introducing pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the ground, or in air, in accordance with the Navy’s Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.
10.c	Pond identification (including anchialine ponds) is inadequate and there are more ponds used by ESA species.	The purple area depicted on the maps in the Draft and Final Environmental Assessment (EA) is a study area. Training would not occur within or the immediate vicinity of ponds, including anchialine ponds. Training would only occur on lands where there is a right-of-entry or other real estate agreement with a willing property owner or property manager and on military properties identified on the map. Please note that NSWC has done an extensive search for sites within the training study area that meet its training requirements and minimize or avoid impacts to the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations).

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
Air Quality		
11.a.	Concerned about air quality impacts from weapons, landing craft, and other vehicles.	Air quality is analyzed in Section 3.1 of the Draft and Final Environmental Assessment (EA) and Air Quality Calculations are presented in Appendix B. Transportation vehicles, vessels, aircraft and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on the ambient air quality of the region. In addition, the dispersive nature of the proposed activities would prevent pollutants concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed NAAQS. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination. Therefore, no significant impacts on air quality or air resources would occur with implementation of Alternative 2 (Preferred Alternative).
11.b.	Protect citizens by keeping the air clean.	[see response 11.a.] Training events would also be widely dispersed throughout the training areas to prevent potential criteria pollutants from concentrating in a single location.
Noise		
12.a.	Reduce noise around where people live.	As stated in the Draft and Final Environmental Assessment (EA), Section 3.5 (Noise), training activities would generally occur away from residentially zoned areas and the operational conditions of land-based activities is to remain undetected and leave no trace of presence during or after the training. In addition, the operational conditions of aviation activities to maintain elevations above 2,000 feet except for short periods (below 500 feet for approximately 10 minutes) associated with proposed training under Alternative 2 (Preferred Alternative) avoids and minimizes noise and potential noise impacts. Disturbances are expected to be short term and infrequent and any impacts on points of interest are minimal and short term based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities.
12.b.	Concerns about noise impacts (to humans/tourists) from helicopters, other aircraft, and vehicles	[see response 12.a.]
12.c.	Concerns about noise impacts to marine species	As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and aircraft. The UUVs would operate sonar devices that would use the same underwater noise frequencies that are used in fish-finding devices found on private and commercial fishing boats; no other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources,

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).
Airspace		
	No Comments	
Land Use		
14.a	Community land management plan (Molokai) has been disregarded by the military	Under the Proposed Action, the goals and objectives of the Hawaii State Plan and supporting community plans would be maintained. The Proposed Action does not include changing access to or use of land owned or managed by the State of Hawaii or counties and will not interfere with implementation of the goals, objectives, and policies outlined in the State Plan or county plans, including the Molokai community plan.
Recreation		
15.a	Concerned about public becoming unwitting enemy combatants and, as a result, being accidentally injured, traumatized, or aggravating PTSD symptoms and other mental health issues.	Prior to a training event taking place, NSWC support staff visit a training site to assess if the site is available for use and minimal potential for interaction with the public. The intent of the training is for trainees to be unseen. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. There is no intent to utilize the public in any of the training events or scenarios.
15.b	Beaches and parks should not be used for training and the military should remain on designated bases.	The essence of the proposed training is similar to hiking, swimming and camping, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence. To conduct activities in State or County parks, NSWC will coordinate with and obtain permits as is required, prior to the use of specified public lands.
15.c	Parks are sacred places for recreation, conservation and reflection.	NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts to the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		made to create the most challenges for the trainees and be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.
15.d	The use of public beaches and parks for training would discourage people from using public parks and trails.	The proposed NSWC activities are similar to hiking, swimming and overnight camping, with the added component of the intention to remain undetected and leaving no trace of their presence. Additionally, there is no active training operation for the public to see. The trainees learn skills needed to avoid detection and enter a site at night. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there were a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area. Public beach users will not be denied access to public beaches or parks. No parks will be closed for NSO training.
15.e	Do not close any public beaches because of training.	All training activities would be non-invasive in nature and the Navy has no intention or authority to close public beaches.
15.f	Concerns about impacts to aquatic recreation (paddle boarding, boating, swimming, fishing, diving, etc.)	Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.
15.g	How will training activities impact recreation, in general	[see response 15.e and 15. f]
15.h	EA does not identify all the significant recreational resources in the proposed training area	The Navy utilized the best available science to identify the existing recreational resources in the training study area. Please refer to Section 3.2 (Land Use - Recreation) for a full analysis of recreational resources.
15.i	Concerns about impacts to land-based recreation (hiking, camping etc.)	The land-based components of the proposed training are similar to land based recreation activities, such as hiking and overnight camping, with the added component of the intention to remain undetected and leave no trace of their presence during or after training activities. As a result, there should be no impact to land-based recreation. The trainees learn skills needed to avoid detection and the Navy has no intention or authority to close public recreation.
Biological Resources		
16.a	Concerned about urination and defecation, that it would destroy plants and adversely affect wildlife.	As described in the Draft and Final EAs (Section 2.1.3, Land-Based Training Activities), as part of the training intent that the activities be undetected, the support personnel teach trainees that no expended equipment, human waste, or transported liquids remain on site after the training activity is completed. Human waste will be handled in compliance with all federal and state human waste management guidance.

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
16.b	Equipment would damage coral.	As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral and would avoid coral when in operation. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized.
16.c	Trampling would affect coral, marine invertebrates, and juvenile fish, and pollute water.	As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates or juvenile fish. Trainees would avoid coral when in operation. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.
16.d	Sonar will affect marine species	As stated in the Draft and Final EA Section 3.3 (Biological Resources), submersibles use a sonar device to report depths to aid in navigation during a training activity. These devices have similar specifications to commercially available “fish finders” and other hand-held sonar devices, which typically generate frequencies over 200 kilohertz (kHz) and source levels less than 160 decibels referenced to 1 micropascal (dB re 1 µPa). Devices with these specifications are considered de minimis sources of sound in the water. No other types of sonar are proposed.
16.e	Looking for mitigations (1) should vessel contact or injure marine mammal and (2) undisturbed areas used.	As stated in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs, trainees would avoid animals in the water, such as Hawaiian Monk seals and sea turtles, and would not approach animals resting on the beach. When in the presence of whales, personnel would shut down boat engines in accordance with boating regulations and

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		Navy procedural instruction. Submersibles and small inflatable boats would not bottom out or come ashore in sensitive habitats, such as coral. When training on land, sensitive habitats would be avoided, such as known bird nesting areas.
16.f	Draft EA dismissed impacts on nesting or migrating birds.	When training on land, sensitive habitats would be avoided, such as known bird nesting areas.
16.g	The public has a general disbelief that training would have no effect on marine and terrestrial wildlife and plant life.	The Navy assessed the potential effect of the proposed training on marine and terrestrial wildlife and plant life. However, as the analysis in the Draft and Final EAs shows, there would be no significant impacts to these resources. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s impacts to biological resources.
16.h	Military activities occurring during whale migration and/or breeding season within the area of whales	The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.
16.i	General concern for impacts to wildlife and endangered species	The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.
16.j	Concern over impacts to fish communities used for recreation and food	The Final Environmental Assessment (EA) has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.
16.k	Concerns about marine sanctuaries	The Final Environmental Assessment (EA) has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources).
16.l	Concerns for endangered monk seal specifically	The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal. However, as the analysis in the Draft and Final EAs shows, there would be no significant impacts to the Hawaiian monk seal or its critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		impacts to biological resources. The Navy has consulted with NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s impacts on biological resources.
16.m	EA does not identify significant biological habitats in the proposed training area	The Navy utilized the best available science to identify the existing terrestrial and marine biological features in the training study area in Section 3.3.2 (Biological resources, Affected Environment), including endangered species presence, critical habitat and wildlife management areas. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s impacts to biological resources.
16.n	No assessment of potential impacts to anchialine pools / anchialine shrimp	[see response 10.c]
18. Cultural Resources		
18.a	Concerns for undisturbed Hawaiian archaeological sites	The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.
18.b	General concern for Hawaiian cultural resources, places, practices	[see response 18.a]
18.c	The Navy has not adequately surveyed for the presence of traditional cultural properties.	[see response 18.a]
18.d	Roads that will be used during the proposed activities are too close to significant cultural resources	As stated in the Draft and Final EAs, the proposed training does not include off-road driving. Pickup trucks and/or a van would be driven on roadways to the training site by support staff and parked in designated parking locations. Road usage by NSWC would be the same as road use by the public.
18.e	EA does not identify all the significant cultural resources in the proposed training area	[see response 18.a]

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
18.f	The DEA violates NHPA and HRS Chapter 6E, which are both required before the State of Hawaii can accept the DEA.	[see response 19.a]
18.g	There is no documentation in the DEA that shows any effort to identify NHOs that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties	<p>NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, The Environmental Notice, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in the Hawaii Office of Environmental Control bulletin "The Environmental Notice" on December 8, 2018 announcing the comment period extension. Copies of the Draft EA were placed in public libraries. The Notice of Availability also included a solicitation for individuals or organizations interested in participating in the Section 106 process: "Concurrent with the National Environmental Protection Act (NEPA) process, the Navy is conducting National Historic Preservation Act Section 106 consultations regarding potential effects of the Proposed Action on historic properties. NSWC has determined that the naval special operations training is considered an undertaking as defined in the National Historic Preservation Act (NHPA) 36 CFR §800.16(y) and has the potential to cause effects on historic properties. Pursuant to 36 CFR §800.2(d), 800.3(b), and 800.3(e), the Navy is soliciting members of the Public who wish to participate as consulting parties in the NHPA Section 106 process associated with this Undertaking. If interested in participating, provide written notification at the email or physical addresses below within 30 days of this notice."</p> <p>The Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, the Hawaii State Historic Preservation Officer, National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. Currently, all consultations are concluded, correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence).</p>
19. Section 106 Consultation		
19.a	Navy has not consulted with Tribes or local governments about historic and cultural sites.	At the time of the Draft EA, consultations had begun. The Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, the Hawaii State Historic Preservation Officer, the National Park Service and 62 Native Hawaiian Organizations, historic partners, and the Public. Consultation letters were sent in August 2018 and then again in March 2019. Currently, all consultations are concluded, correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence).

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		All training events on non-DoD land would be conducted in accordance with real estate agreements and other authorizations, including those that may be subject to Hawaii Revised Statutes Chapter 6E by the landowners. The Navy would coordinate with land managers (where applicable), and property owners prior to use of the property for training.
19.b	Navy should also contact other cultural organizations, especially in the local area (one named Koolaupoko Hawaiian Civic Club).	NAVFAC Pacific addressed response to comment at the time of receipt as part of Section 106.
19.c	Requests copy of Section 106 correspondence with appropriate agencies, including SHPO.	Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.
19.d	Commenter is seeking inclusion as a consulting party for cultural resources / during Section 106 process.	NAVFAC Pacific addressed response to comment at the time of receipt as part of Section 106.
20. Visual Resources		
20.a.	Disbelief that the military activities will not diminish visual quality	As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or structures at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.
21. Transportation		
21.a.	Concern about the impacts that military training will have on traffic conditions.	As described in Chapter 3 (Affected Environment and Environmental Consequences), all potentially relevant environmental resource areas were initially considered for analysis in the Draft and Final EAs. The Proposed Action would not change or alter transportation facilities or circulation of traffic patterns within the training study area or surrounding area.
22. Utilities		
	No Comments	
23. Socioeconomics and General Services		
23.a	Concerned for amount of money and resources expended on militarization of the Hawaiian Islands.	The Navy is not proposing to militarize the Hawaiian Islands. The proposed training activities are similar to hiking, camping, diving, and swimming that are conducted by the general public, with the added component of the intention that trainees remain undetected and leaving no trace of their presence during and after the training activities.

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
23.b	Draft EA fails to assess impacts to local communities, environment, and local economy.	NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees’ skills, experience, and confidence by challenging them in a location with dynamic weather and land/warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive. NSWC would not build training devices or structures at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site.
23.c	Concerned about drops in property values due to public knowledge of trainings.	There is no reason to expect devaluations of property values. Proposed training would occur only on sites with the permission of landowners or managers (e.g., Hawaii State Department of Land and Natural Resources, counties or private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, manned air operations, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site.
23.d	Concerned about the depression of the Hawaii tourism industry associated with the water, shoreline, and public parks on which many residents depend.	There is no reason to expect impacts to tourism. The proposed training would occur only on sites with the permission of landowners or managers (e.g., Hawaii State Department of Land and Natural Resources, private property owners, etc.). All training activities would be non-invasive. NSWC would not build training devices or structures at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, manned air operations, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training. Accordingly, there should be no impact to the State parks or to the members of the public visiting the State parks.
23.e	Concerned about impact of military presence on general population.	The Navy is not proposing to turn natural spaces into militarized regions. The proposed NSWC activities are similar to hiking, swimming and overnight camping, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence during or after the training activity.

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
23.f	Concerned about impact of military presence on general population.	There is no active training operation for the public to see. The trainees learn skills needed to avoid detection. Support staff would be dressed as a member of the public and would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.
23.h	Concerns over general tourism and/or the economy due to tourism (similar to 23.d).	NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees’ skills, experience, and confidence by challenging them in a location with dynamic weather and land/warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and does not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal(with the exception of one federal property location), tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site.
23.i	Not being able to continue subsistence fishing in the Study Area.	The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.
23.j	Navy must obtain real estate rights from the landowners whose properties will be involved in the proposed action.	Proposed training would occur only on sites with the permission of landowners or managers and receipt of rights of entry or other real estate agreements.
24. Hazardous Materials and Waste		
24.a	Concerns about unexploded ordnance (UXO) clean-up and/or general cleanup of expended materials.	As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.
24.b	Toxins and cleaning up toxins	The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of BMPs, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		waste would not be released into the environment under the Proposed Action. Military expended material such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing characterization, recycling, and disposal programs.
24.c	Military producing pollutants (in general).	[see response 24.b]
24.d	Hawaiians will be left to clean up the mess made by the military.	[see response 24.a and b]
25. Public Health and Safety		
25.a	Concerns about accidental fire danger.	[see response 24.a]
26. Environmental Justice		
	No Comments.	
27. Mitigation		
	No Comments.	
28. Public Involvement		
28.a	Not enough time for public comment and notification about the project and EA draft.	The 30-day public comment period on the Draft EA was extended by 30 days based on requests received during the comment period. The total comment period was 61 days. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.
28.b	Request for public meeting.	CEQ regulations implementing NEPA (40 CFR Section 1506.6 (a)) direct agencies to make diligent effort to involve the public in preparing and implementing their NEPA procedures; however, public meetings are not a requirement for EAs. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.
28.c	Request for further efforts to alert the public about the EA and comment period.	CEQ regulations implementing NEPA (40 CFR Section 1506.6(a)) direct agencies to involve the public in preparing and implementing their NEPA procedures. State regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin <i>The Environmental Notice</i> (HAR Section 11-200-3). NSWCC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in <i>The Environmental Notice</i> , on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). The Draft EA was available online and copies were placed in the following public libraries: <ul style="list-style-type: none"> • Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813 • Kauai: Waimea Public Library, 9750 Kaumualii Hwy, Waimea, HI 96796

Table C-1. Responses to Public Comments by Resource Section

COMMENTS BY RESOURCE SECTION		
		<ul style="list-style-type: none"> • Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740 • Maui: Kahului Public Library, 90 School St, Kahului, HI 96732 • Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748 <p>Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in <i>The Environmental Notice</i> on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.</p>

C.2 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter: General Support of or Indifference to the Proposed Action

Commenters listed in Table C-2 submitted comments that expressed general support of the Proposed Action or did not identify whether they were in support or against the Proposed Action. These individuals received the response letter below. The individual submitted comments are provided after the response letter.

Table C-2. Recipients of Comment Response Letter: General Support of or Indifference to the Proposed Action

Name
Bitsy Rapp
Joe Vitorino
Jonathan H. Guilbert
Ken Walker
Dave Pratt
Kent Anderson
Kent Merrill
Aaron Mitchell
Robert P. Egan
Daylan Kaitoku
Anonymous Student – Kohala Middle School
Brian Helps
Jack Johnson
Mark Gordon
Donald Ford



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

To [*Commenter*]:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for your supportive comment and for participating in the National Environmental Policy Act process. Your comment has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: [*Date*] comment letter from [*Commenter*].

Copy to: Hawaii Department of Land and Natural Resources

From: Bitsy Rapp <bitsycavanaugh@outlook.com>
Sent: Saturday, November 24, 2018 4:38 PM
To: NFPAC-Receive
Cc: ricrapp@hotmail.com
Subject: [Non-DoD Source] We need the US Military

As a resident of Hawaii Island, I am not opposed to military exercises as I believe in a strong defense and do not espouse NIMBY. I ask that the military respect residents including humans, whales, turtles, fish, birds, and our beautiful mostly unspoiled coastline.

Sent from my iPhone

From: Joe Vitorino <jrvito@wildblue.net>
Sent: Saturday, November 24, 2018 8:59 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Hawaii Island Training

Aloha,

I wanted to send my feedback on the upcoming training exercises being planned for Hawaii Island.

I think it is a great idea to keep our forces well trained in order to be ready to face threats around the world.

Thus, I wholeheartedly agree with your plan and appreciate all that our military does to keep our country safe.

Mahalo,

Joe Vitorino

Kohalayouthranch.com

(808) 895-6773

From: Jon G. <jonguilbert7@gmail.com>
Sent: Saturday, November 24, 2018 4:56 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] YES to Trng Ops on the Big Island

Aloha, just received a disappointing email about stopping military and naval excercises throughout the Kohala coast region of the Big Island. It is full of inaccuracies, hyperbole and alarmist hystical. Please know this is one US citizen living in Waikoloa SUPPORTING any and all RimPac or other training exercises in this county. My last command I was assigned to on Oahu before retiring was SOCPAC.

Please come to the Big Island to train. Very Respectfully, Jonathan H. Guilbert, LCDR, US -Ret. 68-3628 Eleele St., Waikoloa HI. 96738. 808-640-9408

From: ken walker <808smate@gmail.com>
Sent: Sunday, November 25, 2018 9:10 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Using the Big Island for trading.

It sounds like a great Idea to use the Big Island for training.

Glad to hear about this consideration.

From: Dave Pratt <davepratt00@yahoo.com>
Sent: Tuesday, November 27, 2018 11:48 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Use of Hawaii for Military Exercises

Go for it.

Dave

Dave Pratt

davepratt00@yahoo.com <mailto:davepratt00@yahoo.com>

From: Kent Andersen <kander1@onepsi.com>
Sent: Tuesday, November 27, 2018 5:46 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Kohala Exercise

I see on social media that there is a thing going around about trying to stop the exercise on Kohola.

I would like to say, Please do your exercise. Practice away, god forbid we have 10.000 screaming chinamen trying to make a beachhead and no experience in the area.

From: Kent S. Merrill <kmerrill808@gmail.com>
Sent: Tuesday, November 27, 2018 12:19 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Navy Use Kohala Coast - in support

A well trained military is essential.

I live on the Big Island and I support military exercises along the coast of the Big island.

Regards.

Kent Merrill

From: aaronmitchellism@yahoo.com
Sent: Tuesday, December 11, 2018 3:23 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] 2019 Hawaii Training Exercise

Aloha & E Komo Mai!

Welcome to Hawaii, with our blessing as a family. Stay safe and train hard, the world needs sharp operators. Mahalo for your service, we will never forget.

God Bless,

The Mitchell Family
Hilo, Hawaii

From: Cathy and Bob <rpcpegan@azfoodies.com>
Sent: Sunday, December 9, 2018 12:53 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Upcoming Exercises on the Big Island

Aloha:

I am a retired USAF LT Colonel and my oldest son is currently in the US Army. I look forward to watching the exercises and watching the finest fighting forces while they train. Please take care of our great island and of course each young man and woman participating in these exercises. Not all individuals living in the island are anti military. I support each one of you 100%

Retired USAF Lt Colonel Robert P. Egan

Dear Project Manager,

I think that you should do it, I feel that it is not ok but I am still thinking. Also Because there are a lot of sources of information . So my choice is ok. The reason way is that there might be a invasion or attack of some sort and you need to train. Reason 2 is that you need a place to train new people. Reason 3 is that you may need a place that looks like another place to train for a invasion.

Sincerely,
Daylan Kaitoku

Dear Project Manager,

Hi, I am a student from Kohala Middle School. I think the Military should be able to do exercises because a war or a bomb might hit and there are prepared soldiers. In my opinion I think we should bring the military here to keep us safe. And I think it will be safe for us and the whole town.

In conclusion:

We should bring the military to Kohala, Hawaii. So if something comes here they are ready. And we are safe.

Sincerely,
Kohala Middle School Student

From: Brian Helps <mauihms@gmail.com>
Sent: Sunday, December 30, 2018 1:04 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] I support the military practice.

As a resident I support the practice and welcome it. I only wish I had the time to enjoy watching it. This is a necessary tool for the sake of the country's safety and presence to threats abroad. PERIOD. Thank you, Brian Helps

Sent from my iPad

JACK JOHNSON I
2300 E KAM HWY V
KAUNAKAKAI



2018 DEC 11 P 12: 21



2018 DEC 11 P 12: 20

Dept of LAND

Natural Resources

Samuel Lemmo:

MR Lemmo:

HAVING BEEN A HALF TIME RESIDENT FOR A FEW YEARS AND A SPORT FISHERMAN - I WOULD NOT HAVE A PROBLEM WITH THE NAVY SEALS AND THEIR TRAINING

I HAVE ALSO BEEN A RESIDENT AND BUSINESS OWNER ON KODIAK ISLAND ALASKA WHERE THE SEALS DO THEIR COLD WEATHER TRAINING. 15+ YEARS AGO MY NEIGHBOR WAS THE SEAL BASE COMMANDER - A GENTLEMAN WARRIOR WITH A GREAT FAMILY OF A WIFE AND 2 SMALL GIRLS.

UNTIL RECENT YEARS WE HAD OVER FLOW FROM THE SEAL BASE AT THE BEST WESTERN KODIAK INN THAT I OWNED. GRATEFUL FOR THE BUSINESS.

SEALIONS ARE GIVEN SPECIAL NOTICE THERE AND I HAVE NOT SEEN ANY PROBLEM WITH THAT ISSUE.

YOU MAY SEE A BLACK PICKUP LAUNCHING A BLACK SOFT SIDE BOAT BUT THATS IT.

I INTRODUCED THE SEAL BASE COMMANDER TO A NATIVE CEO - PAST - AND THEY APPEARED TO WORK OUT LOGISTICS. NO NOISE NO COMMOTIONS -

WE NEED TO SUPPORT THOSE THAT PROTECT OUR NATION WHERE WE CAN -

SUCH HIGH QUALITY NAVY PERSONEL WOULD

be AN ASSET to the area. — ✓
A SEAL WAS ATTACKED THIS FALL BY
a Kodiak Brown Bear AND MAULED. The coast
guard did their part AND helicopter Rescued
the service man.

Without that you wouldn't know
they were AROUND —

Please give these five personnel
and department of NAVY your favorable
Attention

Jack Johnson


From: Mark Gordon <mark.gordon333@gmail.com>
Sent: Tuesday, December 4, 2018 9:38 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Comments on Naval Special Ops Training - State of Hawaii Environmental Assessment (EA)

Hi

Thanks for allowing us to comment on the Subject EA.

From a review of the EA, I believe it was very well detailed and clear. I believe that this type of training is needed to ensure our Military is thoroughly trained on the land, water and air, especially prior to major deployments.

Just a few suggestions and comments.

- * Suggest going with Alternative 1, since from my review and observations, it is less distributive to the local communities as well as birds, marine and animal life. Depending on the results of this training and with reviewing public input and comment, Alternative 2 could be considered at a future time.
- * Agree live ammunition should only be used on Federal properties and if possible, the use minimized.
- * Avoid loud aircraft noise, especially over residential areas. Suggest not using the C-17 or similar aircraft if possible.
- * Ensure all part of the emergency response plans are reviewed and practiced thoroughly prior to the Exercises.
- * Ensure all Hawaiian lands and other cultural and historic sites are not disturbed. Suggest working, which is probably already done with the Office of Hawaiian Affairs.
- * During diving and other water exercises, ensure that the training is not done in any protected areas, including coral areas. Also avoid areas which could disturb daily marine life.
- * Avoid doing exercises during the times of year when whales are near the Islands.

Thank you for allowing me to share my comments and observations.

Questions or comments, please let me know.

Mark Gordon, CHMM
Environmental, Health and Safety Manager, JM Decker Group Waikoloa, HI.

Mark

From: Donald Ford <quitman70@hotmail.com>
Sent: Wednesday, November 14, 2018 1:38 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] 2019 military exercises HAWAII ISLANDS

A KAPOUKAI THOUGHT

2019 * 1st YR - BIG ISLAND OF HAWAII**
2020 * 2nd YR - MAUI (THREE ISLANDS) AND OAHU INCLUDED**
2021 * 3rd YR - KAUAI INCLUDED**

2019 * HO'OKUPU "GIFT GIVING" CEREMONY
@ PU'UKOHOLA HEIAU "TO KING" KAMEHAMEHA -
200 YRS ANNIVERSARY OF HIS 1819 DEATH:

**THE KING OF KINGS AND CUSTODY OF
 FAMILYS (OHANA) WAR GOD "KUKAILMOKU"**

ON HIS BIG ISLAND HOME AND HOME OF PELE
 " A *GIRL GODDESS*" ON THE KOHALA/COAST/OCEAN
 WITH *QUEEN OF QUEENS*
 KAILU-KONA/COAST/OCEAN/VOLCANO

KING KAMEHAMEHA KING OF KINGS A WARRIOR MILITARY KING

BORN 1758 NORTH KOHALA COAST SKY COMET WEATHER STORM
 "ISLAND" AND "OCEAN" AND "VOLCANO" PELE "WOMAN GODDESS"
 SCHOOLED IN KAILUA-KONA KINGS COURT
 STUDIED @ KILAUEA "PELE" A *WOMAN GODDESS OF HAWAII ISLANDS*
TRAINED TO BE MILITARY WARRIOR & LEADER

**1782 UNCLE DIES AND GETS N. PART KOHALA AND GETS CUSTODY OF
 FAMILY'S WAR GOD "KUKAILMOKI" A OHANA WAR GOD**

1791 PU'UKOHOLA HEIAU
 KILLS COUSIN RIVAL SACRIFICED AND
BIG ISLAND HAWAII IS KING OF KINGS

LAVA "*OCEAN*" STONES TO BUILD FROM "OCEAN" FROM
 HAWI/KAAPAU AND VALLEY N. KOHALA COAST
 TO S. KOHALA PUUKOHOLA HEIAU
THE KINGS TRAIL

BEFORE 1791 RETURNED FROM MAUI AND FOUGHT NAVAL BATTLE
 OFF WAPIO VALLEY AGAINST "ALL ISLANDS"
AND WON

1795 THEN MAUI (THREE ISLANDS) AND OAHU

1810 THEN KAUAI

1812 FIRST HO'OKUPU "GIFT GIVING" CEREMONY **WITH WOMAN SEER**
AND KING KAMEHAMEHA RETURNS TO LIVE OUT ON HIS HOME
THE BIG ISLAND OF HAWAII

1819 KING KAMEHAMEHA DIES

1919 HO'OKUPU "GIFT GIVING CEREMONY AUGUST BIG ISLANDS 100 YRS

2019 HO'OKUPU CEREMONY 200 YRS ANNIVERSARY KOHALA/KONA

MY CARSON CARLIN HUMOR

OK YOUR PET OF THE MONTH SELECTION LIST

OF HAWAIIAN CREATORS IN THE OCEAN

I DID NOT SEE "KILLER WHALES" OR "SHARK" OR "SEA SNAKES"

THAT HAWAIIAN STATE FISH HAS BRIGHT COLORS ON DARK

A CELEBRATORY SWIM SUIT

A CELEBRATORY HAT

A CELEBRATORY PATCH

COVERS THE NIPPLES

YOUR LEGALLY IN DRESS CODE

SEALADY'S

PATCH 2019 OCEAN ISLANDS MILITARY EXERCISES

PELE'S KUKAILMOKI'S

W/ OCEAN HAWAIIAN CREATORS COLORS

CAN YOU SWIM FROM BIG ISLAND

WITH CHANNEL CURRENTS AND TRADE WINDS

TO MAUI???

MAUI (THREE ISLANDS) TO LANAI NO PROBLEM

MAHALO

DONALD W FORD

C.3 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter: General Opposition to the Proposed Action

Commenters listed in Table C-3 submitted comments opposing the Proposed Action but did not include any further specific comments or concerns. These individuals received the response letter below. The individual submitted comments are provided after the response letter.

Table C-3. Recipients of Comment Response Letter: General Opposition to the Proposed Action

Name
Bruce Thabit
Andrew Lavenziano
Andrew Sheinis
Joan Channon
Shannon Speier
Debi Javar
George McClosekey
Grace Morgan
Susan Miranda
Donna Worden
Kris Bordessa
Kelly Hoyle
Charlotte Iida
Susan Barnes
Vicki Vierra
Joan Heller
8082091696@vzwpix.com
S.H. Kiope Raymond
Sharon Palen
Elizabeth Parker
Mary Lawrence
Renee Riley
David and Miriam Swanson
Debra Greene
Kay Carlyle
Maree von Sonn
Danny Li
Pamela Palencia
Darlene Tunney
Madolin Wells
Ray Newman
Carolyn Havens
Jas Marlin
Gregg Blue
Reatha Sorensen
Theresa Costa
Martha Martin
James Grenz
Rebecca Sydney



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

To [*Commenter*]:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your concerns are duly noted. Please note that the increased training requirement is in accordance with the Naval Special Warfare Command meeting its Title 10 U.S. Code Section 167 mandate as discussed in Section 1.3 (Purpose of and Need for the Proposed Action) in the Final EA.

The topic of military expansion is outside the scope of the project. However, for clarification and as discussed in Section 1.1 (Introduction) of the Final EA, naval special operations personnel have been training in certain areas of the State of Hawaii for the past two decades. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operations forces.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: [*Date*] comment letter from [*Commenter*].

Copy to: Hawaii Department of Land and Natural Resources

From: Bruce Thabit <bthabit@live.com>
Sent: Tuesday, November 13, 2018 8:28 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Hawaii Military Exercises

Dear Sir or Madam,

Deliver me O Lord from evil men.
Preserve me from violent men.
They continually gather together for war.
They sharpen their tongues as snakes.
The poison of asps is under their lips. Psalm 140.

There is nothing wrong per se preparing the army for war, This preparation may be done in some God forsaken place. But to make the military training ground in the already eco-damaged Hawaiian Islands, the crown jewel of planet earth is folly.

As you clumsy bum rush your folly, a fait accompli, it is certain that the Secretary of the Navy will be sued by outraged Hawaiians and the political pressure will cause the training events to cease.

A better course is to train where politics and the courts do not exercise such jurisdiction. It may be convenient to train in Hawaii, but a sword is not forged in ALOHA!

Remember the lessons of Pearl Harbor.

From: Andrew Lavenziano <drusmith67@gmail.com>
Sent: Monday, November 26, 2018 7:19 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Tell you right now, this is not going to happen, thousands and thousands of people will be protesting.

From: Andy Sheinis <quasar@cruzio.com>
Sent: Monday, November 26, 2018 9:33 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Public comment on the EA

Dear PM,

I am a resident of South Kohala. I do understand the need to train our troops and I support that in principle. I do not however support this proposal. It is way over the top, too much impact to people and the environment.

Thank you for your attention,

Andrew Sheinis

From: Bamboo Restaurant <bamboorestauranthawaii@gmail.com>
Sent: Saturday, November 24, 2018 8:46 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Kohala, Big Island, Hawaii

Oh, Please DO NOT allow these military exercises. Please find someplace where there are not people, whales and endangered species living. Please do NOT do this!!!!

Joan Channon

Hawi, HI 96719

From: Shannon Speier <alohashannons@gmail.com>
Sent: Friday, November 23, 2018 4:23 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Kohala coast

This is not Hawaii Aloha.

No military! No training! Stay out of this pristine coastline of cultural significance and with threatened and endangered species of plants and animals. The federal government needs to protect this area, not exploit it with military practices. Go somewhere else. We will be out there in kayaks, boats, and swimming, scuba, and fishing to protest.

Be gone.

Aloha.

A concerned and enraged resident of North Kohala since 1980.

From: Debi Javar <debijavar@gmail.com>
Sent: Thursday, November 29, 2018 1:05 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military exercise West Hawaii coast

NO THIS SHOULD NOT BE ALLOWED. THE MILITARY IS RUINING OUR ISLANDS! ENOUGH ALREADY! GO DO IT ON THE CONTINENT WHERE THERE IS ABUNDANT LAND! LEAVE HAWAI'I ALONE!!

From: George Mccloskey <georgejosephmccloskey@gmail.com>
Sent: Wednesday, November 28, 2018 4:01 PM
To: NFPAC-Receive
Subject: [Non-DoD Source]

Stay away

From: grace morgan <morganlotus62@outlook.com>
Sent: Monday, November 26, 2018 5:59 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Kohala, HI

This is horrible coming to this Island will destroy our environment and effect our wild life and marine life along with locals terribly. I oppose this.

From: susan miranda <miranda_susan@yahoo.com>
Sent: Friday, November 30, 2018 9:22 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Proposed military exercises Kohala

Dear Project Manager:

Hawaii is so very beautiful. I ask that you, please, consider not doing these exercises. Thank you for your consideration.

Susan Miranda

From: Donna Worden <dworden@csumb.edu>
Sent: Wednesday, December 5, 2018 1:41 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Project Manager, EV21.JZ

I am completely OPPOSED to the proposed military exercises planned for the northwest coast of the Island of Hawaii.

From: Kris Bordessa <kris.bordessa@gmail.com>
Sent: Sunday, December 2, 2018 1:40 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] NO ACTION on expanding activities in Hawaii

I'm a resident of Hawaii Island and I adamantly oppose the expansion of the US Navy Special Ops into our island communities. Not just on the island on which I live, but statewide. The impact this would have to our 'aina, the oceans, and the residents of Hawaii is tremendous — and unacceptable.

NO ACTION on expanding in Hawaii. NONE.

Thank you for your time.

Aloha,
Kris

From: Kelly Hoyle <personalbesthawaii@gmail.com>
Sent: Tuesday, November 27, 2018 8:48 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military exercises

This is a letter in opposition of the proposed military actions for the Kohala coast planned for 2019. I am VERY opposed!

--

Kelly Hoyle

From: Charlotte Iida <charlotte.iida@gmail.com>
Sent: Friday, December 7, 2018 3:06 PM
To: NFPAC-Receive
Subject: [Non-DoD Source]

ACTION ALERT: The Military doesn't just want to do military water and land exercises on Molokai - they want to do exercises on all islands including Maunalua Bay on O'ahu and the whole WAI'ANAE COAST from Ka'ena Point to Nānākuli! 1/7/2019 is the deadline to send in your comments email NFPAC-Receive@navy.mil

For more information go to https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information/environmental-assessments-availble-for-public-review.html

You need to take your oligarchs military occupation and get off our islands .

--

Charlotte Iida
Iida Marketing and Design
Cell: (808) 587-7053
Email: charlotte.iida@gmail.com

www.iidamarketingdesign.com

From: Susan Barnes <forkukii@gmail.com>
Sent: Wednesday, December 12, 2018 10:06 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Planned air maneuvers in Kohala

I do not want an increase in these maneuvers. There are Ospreys already flying around, day and night, off the Kohala Coast north of Oahu airport that I see from my windows near the coast. And this is not even the area you are describing which means you are not trustworthy and therefore not to be trusted in the future. A lose-lose situation.
Aloha from Susan Barnes, Hawi, HI

From: Vicki Vierra <vickiv@hawaii.rr.com>
Sent: Sunday, December 9, 2018 9:15 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] No bombing on Kohala

I am strongly opposed to the Navy practicing bombing there. Let them practice in a virtual reality situation.

Vicki Vierra
Keeau, Hawaii

From: Joan Heller <myoho@hawaii.rr.com>
 Sent: Saturday, December 8, 2018 9:50 AM
 To: NFPAC-Receive
 Cc: 'larry heller'; 'dark_eborious'
 Subject: [Non-DoD Source] NO! U.S. KILL training on Hawaiian lands!! (support with YOUR add-on remarks)



The public is encouraged to review and provide comments on the Draft EA through Jan. 7, 2019. Comments opposing this military madness can be submitted by email to NFPAC-Receive@navy.mil or by mail to Naval Facilities Engineering Command Pacific, Attention: Project Manager, EV21.JZ, 258 Makalapa Drive, Ste 100, Pearl Harbor, Hi 96860-3134

Stop the U.S. Killing Machine!

joan heller's comment: As a Kauai resident, I am opposed to all aspects of the Naval Operations Training proposal for all of the Pacific arena. My comment is to address any and all military training on-going and future.

Your comment here:

From: 8082091696@vzwpix.com
Sent: Sunday, December 16, 2018 12:42 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] SAVE THE BRAVE NO MILITARY AT MAHUKONA 2019 PLEASE
Attachments: 0909181608.jpg

SAVE THE BRAVE NO MILITARY AT MAHUKONA 2019 PLEASE

From: Kiope Raymond <kiope@hawaii.edu>
Sent: Friday, December 21, 2018 8:49 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] re: Draft Environmental Assessment: Naval Special Operations Training, Nov. 2018

I am in favor of no Naval practice at all in Hawai'i. However, since that option is not proffered for this proposal, I recommend the No Action alternative and oppose alternatives 1 and 2.

submitted by:

--
 S. H. Kiope Raymond II
 Professor, Hawaiian Studies
 UH Maui College
 Ka Lama 134
 310 W Ka'ahumanu Avenue
 Kahului, HI 96732
 (808) 984-3244

"O ka kakou makemake io no ia o ka loaa o kekahi mea oiaio loa." J. H. Kānepu'u

From: Sharon <wheels@maui.net>
Sent: Sunday, December 30, 2018 9:37 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] No to Navy Practice in Maui County

Leave our islands alone. You have already destroyed Kahoolawe and never cleaned it up. I say "NO" to Navy practice in Maui.

Sharon Wheeler Palen
 2387 South Kihei Rd
 Kihei Hawaii

From: Elizabeth Parker <elizrose808@gmail.com>
Sent: Thursday, January 3, 2019 3:27 PM
To: NFPAC-Receive
Cc: Pacific Whale Foundation
Subject: [Non-DoD Source] Maalaea

Are you kidding me? The best whale watching in the world is out of Maalaea and you want to make it a place for Naval exercises? Count my tourism out if this comes to pass. I hope you DO NOT ALLOW this.

Elizabeth Rose Parker
 West Kelowna, British Columbia

From: Mary Lawrence <marmaui@hotmail.com>
Sent: Thursday, January 3, 2019 8:46 AM
To: NFPAC-Receive; senbaker@capitol.hawaii.gov; senenglish@capitol.hawaii.gov; senkeithagaran@capitol.hawaii.gov; senkouchi@capitol.hawaii.gov; repdecoite@Capitol.hawaii.gov; repmckelvey@Capitol.hawaii.gov; repwildberger@Capitol.hawaii.gov; repwoodson@Capitol.hawaii.gov; repyamashita@Capitol.hawaii.gov
Subject: [Non-DoD Source] Naval special operations training

Aloha,

Please exert whatever pressure you have to stop this! I have written Gov. Ige separately.

Mahalo,

Mary Lawrence

Kihei, HI

HONOLULU (HawaiiNewsNow) - The Navy has released its final environmental impact statement regarding proposed military training and testing off the coasts of Hawaii and Southern California.

It says it took new marine mammal data and public input into consideration.

That information led the Navy to conclude that sonar and explosives will affect more marine life than previously estimated, but that 99.9 percent will not be harmed (really? I doubt that 100%).

Sonar and explosives training conducted with strict measures in place to mitigate harm would "contribute incremental effects on the ocean ecosystem, which is already experiencing and absorbing a multitude of stressors."

Critics say they will assess whether the Navy has complied with its legal duty to do everything reasonably possible to protect marine animals.

Even with all the mitigation in place, they say, the Navy testing would inflict harm on whales, dolphins and other marine mammals each year.

From: Renee Riley <reene.riley@hotmail.com>
Sent: Wednesday, January 2, 2019 10:11 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] No to training for war on Maui waters and land

Although the Navy said that the public comment period wouldn't be up until January 7, 2019, we know that the decision has already been announced! The Navy will do war training in, on, around the water and on the ground. Maui County is a place of particular beauty and aloha. Besides the destruction the trainings will cause, this early decision reflects my grave concern that we can't trust the Navy. From my front deck, I can see Kaho'olawe, the smallest of the eight main volcanic islands in the Hawaiian Islands. Kaho'olawe is located about seven miles southwest of Maui - and I can see it from my deck. I arrived here in 1985. The Navy used Kaho'olawe for target practice from 1941-1990 - despite decades of protests. Sometimes when the Navy recruits practiced, they missed their target. I remember one bomb landed in the Kihei mudflats - seven miles from its target!! Now the Navy will actually be in and on Maui County islands. Kaho'olawe is still extremely dangerous because of un-exploded bombs. I still can't go to the island I can see from the front of my house! How will the Navy do any better with this new area to harm than it did? I say NO to Navy training in, on, under and on land in Maui County!! Aloha, Renée

From: Dave Swanson <mauidaves@hawaiiantel.net>
Sent: Thursday, January 3, 2019 3:51 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Expanded Practice Activity in Maalaea Bay.

Please rethink your plans to expand activities in Maalaea Bay and redirect them elsewhere. We have lived here only 19 years and still cannot begin to adequately describe the beauty and attraction of the area. The natural wonders of the ocean, beaches and mountain are being overtaxed enough. Please do not add to this by adding your destructive presence. We know what happened to Kaho'olawe and the pitiful results of a 10-year clean-up effort. Don't add to this destruction in South Maui. Please move your exercises elsewhere.

David and Miriam Swanson
3467 Hookipa Pl
Kihei, HI 96753

From: Debra Greene <debra@debragreene.com>
Sent: Thursday, January 3, 2019 5:32 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Oppose Naval Special Operations Training in Hawaiian Islands

Attn: Project Manager
EV21.JZ

I am writing to oppose any expansion of Naval Special Operations Training in the Hawaiian Islands. There are plenty of other places for you to hold combat-ready trainings. There is no need to do it in populated areas and protected marine sanctuary waters.

Debra

Debra Greene, PhD
debra@debragreene.com

From: Kay Carlyle <kaycarlyle@earthlink.net>
Sent: Thursday, January 3, 2019 5:45 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] I oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui.

I canoe with the Maui canoe club and swim and snorkel in Kihei's beaches.

I Oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui.

Kay Carlyle
 Sent from my iPad

From: Maree von Sonn <mareevonsonn@hotmail.com>
Sent: Friday, January 4, 2019 1:40 AM
To: Mark Mackay; von Sonn; lee shapiro; elbee2@gmail.com; Joy and Rob Kaaz; globalmediafred@aol.com Fred Spaniard; Andrew Annenberg; lee shapiro; AnnePierce; NFPAC-Receive; mauijlr@gmail.com; sudhascott@earthlink.net; Rahimo
Subject: [Non-DoD Source] Hoax?

I pray that I was just suckered by a hoax (in poor taste) on nextdoor south.

Someone wrote a long impassioned and horrifying post re plans for upcoming naval warfare practice to be held in ma'alaea bay.

I copied doctored pasted and sent you the post along with my astonished objections - but now the post has been quickly removed and so I hope I fell for a hoax (because the other option is untenable).

Please lmk if you hear more .

Aloha
 Maree
 Sent from my iPhone

From: Danny Li <dlimay7@flex.com>
Sent: Monday, January 7, 2019 7:52 PM
To: NFPAC-Receive
Cc: demilnet-Hawaii@yahooogroups.com; Jim Albertini; tomasbelsky; Wright Tom
Subject: [Non-DoD Source] Re: Navy Special Ops training in Hawai'i

nothing to do with legitimate defense of these islands or the inhabitants. Stop despoiling the environment with all the military toxic wastes. The only training that citizens support would be training to demilitarize U.S. forces(after a thorough cleanup of decades of ordnance and toxins dumped by the military), and ensure a peaceful and neutral Hawai'i be restored. And stop using Hawai'i as a military outpost for Uncle Sam's illegal "expeditionary" missions around the globe.

Peace, Aloha and Imua,
 Danny H. C. Li(Kea'au, Hawai'i)

From: Kachina Palencia <kachinala@outlook.com>
Sent: Saturday, January 5, 2019 8:12 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Ma'alaea Bay, Maui

Your plan to expand "active warfare practice" in Ma'alaea Bay
 Will destroy the Tourist economy, and freak out the Whales!
 Don't do it. A concerned citizen, Pamela Palencia

From: Darlene Tunney <darzline@yahoo.com>
Sent: Saturday, January 5, 2019 1:16 PM
To: NFPAC Receive
Subject: [Non-DoD Source] Active combat practice in Hawaii

To Whom this Concerns,

I register my strong protest to any plans to use the Hawai'ian Islands as site for active combat maneuver training.

The State of Hawai'i has already sacrificed the island of Kaho'olawe to war.

The bombing went on for decades. The cleanup will take generations.

It is uninhabitable.

Our Pacific Ocean and sea life are already suffering the onslaught of abuse and pollution. Deep water military maneuvers will cause further immeasurable damage.

Please heed my plea to abandon the Hawai'ian Islands as active combat maneuver practice site.

Darlene Tunney Rosene
 Sent from my iPad

From: Madolin Wells <wellsmadolin@gmail.com>
Sent: Saturday, January 5, 2019 12:33 PM
To: NFPAC Receive
Subject: [Non-DoD Source] STOP SONAR TESTING AND BLASTING!

I am new to Hawai'i and just heard about this, so too late for the period of public comment & environmental impact. Nevertheless, I'm adding my voice to the many who oppose the disruption and destructive impact on marine life.

This is wrong.

Sincerely,

Madolin Wells

From: Ray Newman <thayray@gmail.com>
Sent: Sunday, January 6, 2019 5:45 AM
To: NFPAC-Receive; sam.i.lemmo@hawaii.gov; Meagan.ostems@mantech.com
Cc: letters@hawaiitribune-herald.com
Subject: [Non-DoD Source] Special ops training in Hawaii.

I strongly oppose increased military training on Hawaii islands and the surrounding waters. The U.S. should, rather, scale back operations currently in practice. The heavy militarization of these islands entails far-reaching consequences to the ecology of both land and sea, the culture of native Hawaiians, the physical and mental health of Hawaiian communities, and the sanctity of archaeological and religious sites.

The heavy military footprint in Hawaii, rather than protect us, probably makes us more of a target to any would-be aggressor. But what country would dare attack the U.S. when the U.S. has a military budget dwarfing all other top military spenders globally? Proposed expansion of military training are exactly what we DON'T need. Let's SHRINK the military and return its bloated budget to the Americans' taxpayer!

Ray Newman
 71B Panaewa Street
 Hilo, HI 96720
 (808) 961-2462
thayray@gmail.com

Dec. 13, 2018

Molokai Dispatch
and Department of Land and Natural Resources.
Re: Military use of the Island of Molokai.

I am a relative newcomer to this Island, thirteen years. I came from the mainland in 2006. Everywhere I lived, from Montana to New Mexico, I lived in small communities where neighbors care for each other. At the end of the month we'd all gather together and make "compost soup" and bake bread to be certain everyone was fed, enjoyed music and hugs.

As soon as I saw Kaunakakai I fell in love. I respect the Island people and their ways. I admire those who speak up about keeping this place clean of polluted thinking.

I remember reading an article a few years back stating the military wanted to use the area over the water on Kaluapapapa side. It "seemed" harmless even though it didn't feel quite right. I figured I wouldn't have any influence so I let it go.

Every day now two or three Osprey planes fly over the populated part of this Island. Why? I even wondered if they were spraying something in the air to sedate the people so we wouldn't complain. I thought that was a bit paranoid and once again - what could I do about it anyway?

It seems they said they were going to use an inch and now they are blatantly using miles.

Now they want to use "a little" of the land on the opposite side of the Island. I wonder how long it will take them to use miles?

Alone we probably don't have a chance. Together we make a louder noise. I say fight this! Don't allow the military to take over this Island!

Most sincerely,

Carolyn Havens

From: Jas Marlin <jasmarlin@gmail.com>
Sent: Friday, December 7, 2018 9:19 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Seriously?

Do you really, I mean really believe that Mars is a better place for humanity than this earth? I suspect if you are a reptilian who prefers wasted deserts then yes.

On the off chance that there is some lingering dna of humanity left in your cells and soul, grow up and do something GOOD with your life.

How is it that the dysfunctional children of evil are allowed to rain down death and destruction upon all that is good and life giving on this earth.

if you don't like living here in this beautiful earth, if you don't like joy and happiness then leave. Go back to Mars. You destroyed it once already so go back home and live there on your wasted dead planet.

Blessings be,

Jas

Creative Services for Agents of Change

<http://www.jasmarlin.com>

Smile ("they're" watching you!),



*"I have seen the future as foretold in The Books of Prophecy.
 Free Your Mind - read, write and watch science fiction."*

From: gregg blue <gblue@hawaiiintel.net>
Sent: Wednesday, December 26, 2018 1:33 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] No we don't

Aloha

We are 2 long time Maui residents.
 We don't want any more training in our county or state.
 We are totally opposed to these exercises.

Gregg Blue
 Danielle Chomel

Haiku, Maui

From: Reatha Sorensen <reathasorensen@yahoo.com>
Sent: Sunday, December 30, 2018 10:58 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] NO to Navy war practice in Maui County

Please do not use the ocean in Maui County to practice for war. Your actions are harmful to our environment both on land and in the ocean. Please do not continue this. Instead work to protect our environment.

Thank you for your consideration.

Reatha Sorensen
Maui County Resident

From: Theresa Costa <mauiz1003@gmail.com>
Sent: Sunday, December 30, 2018 11:22 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military exercises

Leave our home alone. We live here, and you did enough damage to our island of Kahoolawe in the past, which cost millions of dollars and much man power and time to clean up, and is still uninhabitable. You also damaged our ocean and have depleted our livelihood of fish, goats and deer. Enough already!

Theresa Zita Costa
Makawao, Maui, Hawaii

From: Martha E. Martin <mauimarttha@gmail.com>
Sent: Monday, January 7, 2019 4:22 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Draft Environmental Assessment and FONSI for Naval Special Operations Training in the State of Hawaii

To Naval Facilities Engineering Command, Pacific

As a resident of Hawaii for 62 years, I strongly oppose allowing any Naval Special Operations Training on lands and seas around Hawaii State.

In Hawaii military training has polluted and damaged the Islands. Harming our environment is not the way you should protect US citizens.

Please do not approve continued special operations training in Hawaii.

Aloha,
Martha E. Martin
40 Kunihi Lane #226
Kahului, HI 96732 mauimarttha@gmail.com <mailto:mauimarttha@gmail.com> Jan. 7,2019

From: James Grenz <james-grenz@att.net>
Sent: Friday, December 7, 2018 5:43 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Training

Please Don't!! Use Big Island coast line for training maneuvers.

Be Peace Live Aloha
James Grenz

From: Rebecca Sydney <bexter@maui.net>
Sent: Friday, January 4, 2019 11:05 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] You are banned

My name is Rebecca Sydney.
I live on the island of Maui.
The Navy is not welcomed to do horrific warfare practice near these precious islands.
YOU are the evil of the world and you continue to propagate your madness in the name of "national security".

When I think of the evil taking over the planet and how people are so depressed because of it...YOU are one of the contributing factors.
If you practice for war then you create war...you support war.....you are war....and war is the highest abomination of human kind.
You disgust me and I'm cursing you with complete failure and tremendous loss. It's what you deserve.
STOP the madness because you are making everyone mad!!!

When evil pretends to be good, then we know for certain we are in end times.

**C.4 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter:
Change.org Petition**

A total of 5,710 individuals signed the online Change.org Petition #1 that opposes the Proposed Action; 328 of the petition signatures included an individual comment. Of the 5,710 signers, 3,487 were from the State of Hawaii, 2,024 were from mainland U.S. and Canada, 141 were from Europe, and 58 were from South/Central America, Asia, Africa, the Indo-Pacific region, the Middle East; 10 signers did not provide a geographic location.

The following is the Navy’s response letter to Alyssa Ackerman Slaven, the organizer of the online petition. A copy of the original petition follows the Navy’s response letter.



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Alyssa Ackerman Slaven (alohaalyssas@gmail.com)

Dear Alyssa Ackerman Slaven:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter and petition has been received and are included in Appendix C (Public Comments and Responses) of the Final EA.

As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event.

Overall, the non-invasive nature of the proposed naval special operations training activities (e.g., no live-fire, no construction, no digging, no fires, no human waste) would have minimal effects on the environment because of the short duration, infrequency of occurrence, and low intensity of the proposed training activities. Because the goal of training is for the trainees to be in the field undetected during and after training activities, the environment would be minimally disturbed and materials (e.g., gear and trash) would not be left behind. Based on the analysis in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs, environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Section 2.1 and Table 2-4 of the Draft and Final EAs).

The Proposed Action does not include the use of Upolu Airport and there are no air-based training activities on the Island of Hawaii, including the use of the MV-22 aircraft. Military caravans are also not associated with the Proposed Action.

Ground transportation support is discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training). Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The proposed training is in accordance with the Naval Special Warfare Command (NSWC) meeting its Title 10 U.S. Code Section 167 mandate. NSWC will conduct training in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, *Navy Safety and Occupational Health Program Manual* (2011). See Chapter 2, Section 2.6 (Best Management Practices and Standard Operating Procedures).

Training activities would be consistent with management objectives of individual sites, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

All training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State of Hawaii regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (Hawaii Administrative Rules section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today, from November 8 through November 10, 2018, and once in *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). Copies of the Draft EA were placed in public libraries and made available online. Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, which then closed on January 7, 2019, for a total public comment period of 60 days. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 3, 2012 (sic) comment letter from Alyssa Ackerman Slaven, initiator of Change.org petition.

Copy to: Hawaii Department of Land and Natural Resources

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

From: Alyssa Slaven <alohaalyssas@gmail.com>
Sent: Thursday, December 6, 2018 9:33 AM
To: NFPAC-Receive <NFPAC-Receive@navy.mil>
Subject: [Non-DoD Source] Petition

Aloha,

Here are my comments (11 pages as the bottom attachment.)

2175 (growing all the time) plus names from a petition I started on Change.org link attached.

74 pages of public comments.

A letter from Earthjustice with regards to the already misuse of the MV-22s A letter from the USMC A Press Release

The Big Island of Hawaii is sending a clear message we do not want any more military operations on our island and do not want

this newest proposal to be approved in any way.

We also support the project being dropped from all the other islands if they object as well.

This is an unjust project. I request a 6-month extension, one month as possibly suggested is not enough time given the holidays to retain legal advise and be able to oppose this properly. We request a minimum of 6 months or more to oppose this in detail. The public and our islands deserve this time and the right to not be rushed. As you know it took the Navy years to prepare this with many paid personnel, legal advisors, and professionals in the field of these types of proposals. A month or even two is not an adequate or fair timeline to oppose this for the layperson who must also keep another job. I request time to crowdfund and an opportunity to get an attorney and do our own proper report with our own experts. I also request time to raise money and let the people of our island know this is going on as it was not advertised to our island property or fairly.

Thank you

Petition link with comments

https://www.change.org/p/nfpac-receive-navy-mil-top-u-s-naval-special-warfare-command-joint-operations-on-hawaii-island?recruiter=9177569&utm_source=share_petition&utm_medium=copylink&utm_campaign=share_petition&utm_term=share_petition

To documents sent one 11 page document with my comments One PDF with community comments.

One Letter from Earth Justice about prior misuse of Osprey One letter from the USMC One press release

Please confirm received and all 5 attachments received

--

Aloha

Alyssa Ackerman Slaven

Alyssa Slaven
P.O. Box 1017
Kapaau, HI 96755
808 889-5138

Dec 3rd, 2012

Dear Navel Special Warfare Command and Naval Facilities Engineering Command of the Pacific,

This letter is to plead for a no-action alternative to the proposal for Naval Special Operations Training on The Big Island of Hawaii and not to use North or South Kohala or Kona Coast for any Military Operations. It is important to note this is not coming from someone who is anti-Military my husband is a proud former Marine and veteran for our nation. While I believe in training, I also believe there are many other places a lot more appropriate to do so. There are so many factors and so many reasons why these types of training should not be conducted in our area. I have outlined just a sample given the time constraints for public comments. I started the petition and over 2000 people and growing everyday have signed and made comments. These comments have been sent directly to the email provided. While there are many reasons why each person signed and you may view those individually we all agree NO action and DO NOT want military on the Kohala or Kona Coasts. Here are just a few of the many reasons why zi believe our area should be removed from the proposal. If removal is not possible an E.I.S. should be done and plenty of time for public input and research should be provided afterward to challenge and review the findings. I also support the other islands and their efforts to challenge this proposal.

We are a bunch of very small communities that have enjoyed the unspoiled beauty of large amounts of grasslands and quiet ways of life for generations. Both the day and night time operations would greatly affect our ways of life and those animals and environments that call Kohala Home. The Osprey are very loud and have come at night scaring my 13-year-old child, she can't sleep and is frightened for the entire night making school hard the next morning. These MV-22 have proven to be a huge distribution in our community's quality of life. What makes matters worse as they are not supposed to be here, yet they continue to disregard the final E.I.S. report to use Upolu only in emergency circumstances. The MV-22 Osprey have been using Upolu airport for the last four days in a row for hours at a time and have repeatedly disregarded their agreement with our community. The Osprey used Upolu for more than 800 operations in only three months in 2017. My fear is the Navy and other branches of the military will disregard our community as they have been doing with little regard to what is right and just. I have attached some letters as evidence of the disregard. Letters were also sent out this last week to the USMC commander and they are currently investigating this newest over use.

Vague Encompassing Wording

The Draft Environmental assessment is quite vague, and research has not been done on our island and its unique habitats. The words "generally", "approximately", "not significant", "will affect but not adversely affect" are used. As well as "this is a conservative estimate". This type of language leaves the door open to make things up as you go along and not a definite or scientific type statement or it's concrete effects on any of the subject matters.

The timing of the Report

The timing of the report once again comes at the busiest time of year, and I am quite certain it was planned this way. Additionally, this time to comment fell on not one but two major holiday's both Thanksgiving and Hanukkah. This is when a lot of resident's travel to see family. The short timing also does not allow enough time for organizations such as our Local CDP which should have been contacted to allow for community discussions or voting on these types of projects. Thirty days is not ample time for public comments and serious inquiries and holidays cut that time even shorter. I request an extension to gather evidence supporting why our community and our environment would be devastated by the military operations or events on our coastlines.

ES.6 Public Notice

Public notice was given at Kona Public Library and in West Hawaii Today. However, our communities in North Kohala are more than 1 hours drive North from Kona. No public notice was given to a project that would affect our community in our community. Such as the North Kohala Public Library or our local paper the Kohala Mountain News or our local CDP. After the last Osprey meeting which was held in Waimea over 45 minutes away we requested both in writing and verbally that we wanted our community to know about everything going on with the military, at the meeting they agreed. Something that could affect our comminutes needs to be advertised to our local community. If plans move forward in our area, we request our community have a chance to ask questions and be informed in a public meeting held in our area after the major holidays are complete and preferably after our busy tourist season that goes through March. We also request time to prepare for such a massive report to provide well throughout and researched affects to our environment. With a project that could change our island so much a letter should be sent to every resident community, town halls set up for discussions and a vote had per county. If the Navy is not required to send out letters to everyone. I request our community have the time and opportunity to provide such a letter to make the public aware. Many of the homes along the coast are part-time residents in very exclusive neighborhoods and are not aware of this proposal. We would need extra time to inform them. So far I have only met one origination that was aware of this proposal and no individuals until I shard the links to the proposal. This includes organizations that represent endangered species and other environmental factors on our island. These would amount to big changes in our ways of life and our environment and I request that a proper E.I S. be done including addressing all of my questions and concerns and any others submitted.

Our Unique Environment

The Big Island is one of the most unique environments in the world and is quite different than any of the other islands. Many of our areas and the areas in the report are considered to our island to be sacred and to be left to be natural. Biological studies done on other islands would not be accurate to our island and should not be substituted as such.

Table 2-1

“ The Navy does not anticipate any adverse effects” The Draft EA uses this wording often, however, the Navy has not identified our many sites so how is possible to make an assumption on this yet?

ES.2

The military already has Pahakaloa training on our island that amounts to approx 133,000 acres according to military bases.us. The population of Hawaii islands should be able to vote per county on any additional military training on our islands.

ES.4

While the EA is addressing the potential effects, the public should have another opportunity to comment once those findings are complete and we know what those effects are and have an opportunity to challenge them.

We request a community meeting if this goes any further held in our towns of North Kohala. The draft is very vague in a lot of areas, and I question the following.

- a. Has research been done on all islands as they all have very different environments and our area?
- b. What studies have been conducted on our island in the areas of question? The draft proposes 595 events per year. 330 on non-federal lands and 265 on federal lands. Is an event 4-72 hours? That could be up to 42,840 hours of additional training to our islands or 1785 days and nights. That sounds like the potential for every day at approximately 5 sites. Is this correct? If not what is the timing of an event? Specifically, how many hours on each island? How many hours are daytime hours how many are nighttime hours?
- c. While the report says it will be limited to 10 events per year per location it gives no further information on what is a location. Is it per acre, per parcel of land rented, per town, per island per year, per county? The report is missing these crucial details.

Non Existent studies that need to be addressed.

- a. Water resources and the effects of our community and our island were not addressed.
- b. Our Geological resources were not addressed and are quite different from Island to island.
- c. How is this going to affect our islands visually? We rely on tourism and peaceful calm areas to relax for our guests. The most populated of these tourists areas are right in-between these two proposed sites and would absolutely be affected.
- d. How will the noise affect our children, animals, quality of life in rural areas of our island?

- e. We already have a lot of the helicopters and our island does not need any more air traffic or air noise or pollution.
- f. How will these new programs affect the socioeconomics of our island? Property values, tourism? Small businesses such as the ones I own? My clients come to see old Hawaii to get away from the buzz of the modern world and you want to bring in more MV22s and other noise? I believe this would completely devastate our tourism here.

Environmental Justice

Our community had an outpouring of opposition. Over 2000 signed the petition against this proposed project and it continues to grow. It is not lost on our community that the military decided to release this report during the holidays when many people travel and are usually busy. In North the Kohala Community our quality of life is important to us and the reason many of us live so very far from the comforts of a chain store (over 45 minutes away) or even a stop light is approx 45 minutes away. Our small towns represent a quaint and quiet living environment free from external noise this would drastically change our lives and the business of tourism on our island. This is where the movie stars come to get away from it all and we have some of the most expensive homes on all the islands. In no way is it environmental Justice to our habitats both human and other. What about the over 36 endangered species that live here? Or our untouched ancient, cultural or historic sites. What about morning walks and not seeing or hearing anything but the nature around us.

Upolu Airport

Upolu airport was mostly taken off a draft EA in 2012 mostly due to lack of an E.I.S. and community outcry. since that time the Ospreys still constantly disregard to their agreement with our community and the final E.I.S. While the airport was only to be used in emergencies the airport was used in over 800 operations in approx. three months in 2017. The blatant disregard and lack of oversight has continued, and just this week the Ospreys have used our airport for the last 4 days. Doing well over the proposed operations in just the 4 days training this last week.

- a. Will this proposal use Upolu? Including landing, going down in elevation levels over and over, noise? Nothing in these report addresses Upolu airport, and it is NOT on the map but is the closest to the proposed site in North Kohala.
- b. The last E.I.S. on Upolu airport was done many years ago and a new report needs to be done adding any type of air or ground traffic.
- c. The cliffs of Upolu airport are being rehabilitated due to erosion, has any studies been done on the osprey regarding our island's cliffs and erosion. I have photos showing how much dust they stir up, I am sure this is considered erosion as well.
- d. The report does not say where the staging of aircraft will happen? This airport is the closest to the proposed training areas. Will Upolu be used in ANY capacity including fly overs?

Oversight

This brings up the question of oversight. Who would oversee these programs? Who logs the events keeping track of timing and how many personnel and equipment are involved? It has been my experience no oversight is in place and the MV-22 continues to violate the Final paperwork.

Infrastructure: Transportation

While the Draft EA implies no change or altering to our transportation facilities or circulation of traffic patterns, I would challenge that assessment. HWY 19 has only one lane each direction and is our main highway. It is the only road to the two proposed sites. When military caravans come in they do hold up traffic on Hwy 19. This road is so packed it is almost bumper to bumper almost any time of the day.

- a. What basis or evidence supports that these new exercises would not put undue added traffic on Hwy 19 or Hwy 270 the only two roads along the proposed coastline?
- b. What research was done on the roads current use?

Sea Life, Coral reefs, Fishes and Sea Life Mammal

The proposed area is next to and in protected sea life waters. Such places are Lapakahi along the northern tip of Kohala. The report is very vague and implies that little or no effects will happen to these animals or sea life I do not believe that to be the case.

- a. Will these events interrupt the sleep cycle of any animals or sea life?
- b. Will these events disrupt their mating behaviors?
- c. Will these events disrupt the young and their behaviors?
- d. Will these events disrupt the feed cycles?
- e. Will these events and any sonar use affect our dolphins, whales or other sea life or mammals?
- f. Will the noise of these events hurt or affect any of the life cycles of any of these animals or reef?
- g. Will any of these events pollute any of the nearby streams running into the oceans?
- h. Will the incredible amount of dust the Osprey stir up affect the coral reef, waters or sea life, mammals or other habitats?
- i. Will landing or coming close to landing have any effects on any of these environments or animals?
- j. The whales have their babies in our protected waters just offshore our north coast, how will this affect them?

Fishing

Our community goes through great lengths to make sure our fish will survive for the next generation. Classes are given and the understanding of this in our community. Fishing is a major way of life for our community. How will all the noise and other factors affect our fishing culture here? Many fishermen are concerned for their livelihood and some have made comments about this on the petition.

Endangered Species 3.3.2.-2.S and other areas of the study

Our island is home to many endangered species the study even identifying at least 36 of them. Some of which are Bats, Birds, Hawaiian Monk Seals and Sea turtles. The United States Department of the Interior Fish and Wildlife confirms this. While the draft mentions it will affect the animals in some way it should be minimal.

- a. What studies were done to ensure this is the case?
- b. Have all the animals been identified?
- c. Have their mating, quality of life, young and feeding, habitat, noise and other factors been studied in our area with regards to this proposal?
- d. How will each of these animals be impacted and can how can we be sure this proposal will not add to their endangerment?
- e. What other agencies have been contacted and when can the public view these reports and challenge them?

Fire Danger

The Ospreys are known to be a fire risk. The area proposed is in a critically high grass and brush fire rating area.

- a. The Osprey has a history of fire danger ,has our area been studied to include the unusually dry grasses and brush?

Human Traumatic Stress

The events include things like dropping personal from aircraft or coming close to the ground or landing aircraft. The Osprey, a very fighting and loud sound. One resident sent a comment to you about PTSD and their fear of this. The military sneaking around and try not to be noticed garnishing fake weapons is scary. Our community is active and uses the coastlines daily. What is to stop these forces from coming in contact with our community? Frightening someone with possible dire consequences. I know if a saw a uniformed man or women hiding in the bushes with a weapon fake or real on my daily walk, I would probably have a heart attack. If the proposal included blocking off areas for how long would that be and what exact areas? How would these events affect our community, our children and the fear factor of forces hiding on our shores, waters or from the air? I get anxiety when the Osprey come now, I can feel their vibration in my body it is not a comfortable feeling. I believe these trainings would cause a lot of mental anguish in our community.

Boats Subs and Unmanned Watercraft

- a. How would Subs manned or unmanned effect the sea life, the coral reefs the mammals or our shorelines?
- b. Would fishing boating or swimming or diving be affected especially at Mahukona area?
- c. How does the water tourism industry get affected? I.E. sunset cruises?

Map of Populated Areas

While the charm of the Big Island is its natural beauty and underpopulated areas, the map of our islands proposed site trainings forgot so many areas that people live in.

It's almost like no one actually has even come here? Who came to assess these areas and how long did they stay? Here are just a few missed communities in North Kohala and not on the map, Kohala Ranch, Kohala Estates, Kohala By the Sea, Puakea Bay Ranch and the many high-end tourists destinations of our Kohala and Kona Coast. While the hotels are not in the study areas, they are in-between of the two areas and sound and many of the other factors would affect them.

- a. Have the hotels or Hawaii Tourism authority been made aware of this proposal? A public announcement on our island may not be adequate as many of the hotels have main offices not located on our island?
- b. Socioeconomics has not been included in the report may we know what impacts they are to have on our island that relies on tourism for our economy?
- c. Would the property values go down on our homes or other homes if a training site was done at a neighboring parcel of land? I personally know I would not want to live here if the military was at my neighbor's property. If I tried to sell my home after this proposal went through would my homes value be lower?
- d. What constitutes a populated area as on the big island map? We have many populated small communities that are spread spread out that did not show up on the map given.
- e. Our island was wrongly described as lava fields. A majority of the area is actually filled with all kinds of trees, wildlife, dirt, sand, homes, rock formations and cultural sites and other things not just lava fields.

Cultural and Historic Sites ES.4

The Navy does not anticipate any adverse effects to the historic properties in accordance to section 106, Yet only one site identified is the Ala Kahakai trail is listed in our area. Our area has many culturally and historically significant sites in the proposed area. Some include the Navigational Heiau near Mahukona and Lapakaahi State park. Pu'ukohola Heiau in Kawahie Kings Kamehameha's Birthstones the Ala Loa trail and many other Heiau's and sites.

- a. When and why were those sites not identified on the Draft EA?
- b. How can you ensure all sites have been identified?
- c. What studies have been done to ensure no damage would occur at those sites. Each site is different each would need to be studied and have a different plan.
- d. If damage would occur as the report states on some sites, please identify the sites within our area and how they would be affected.

- e. Would using any of these areas come at the price of disrespect of the Hawaii Culture or their religious practices? If so, please identify?

Visual Recourses

Our community values a view plane free from air traffic, repelling or parachuting personal, hovering aircraft, circling aircraft, military personnel with simulated weapons, these and other visual disturbances impede our current serene view plane.

Socioeconomics

The DEA suggests that socioeconomics would not be affected therefore no study needed. The proposed action would, however, change the population, demographics, employment, COMMUNITY, within these areas and the surrounding areas. In fact, within the two proposed training sites lies our major tourist area and large resorts.

- a. Were the hotels aware that are located between the two proposed training sites?
- b. Are all the residents of the two proposed training sites aware and the resident's in-between as they would hear and see new aircraft and the ground and support staff would have to travel on the roads in-between.

Mahukona, Kapa'a

Mahukona and Kapa'a two community favorite locations were we go to walk, swim, fish and camp.

- a. Would Mahukona harbor be used? Would Kapa'a park be used? In what capacity?

Land

- a. Would the local community have a say in which land could be rented or leased for this is purpose?
- b. What if the neighbor does not want it how can the impacts be avoided on Nonfederal lands that choose not to have this? IE the noise level or potential devastating property value plunge?
- c. Which parcels of land in our area are being considered to rent or lease?
- d. Will the public have an opportunity to make comments to the landowners before the leases go through?
- e. Is the trainings in keeping with our community development plan?

Ground Support

Ground support is very vague in the report.

- a. How many vehicles, aircraft or watercraft or other tools are involved?
- b. How many personal?
- c. How many vehicles will use our already crowded roads?
- d. Do the vehicles go slower than average and would they slow down the traffic pattern?

Aircrafts

While I am familiar with the MV-22 and H-1's I am not familiar with the other aircraft in the proposal.

- a. SI the AE130 long Profile that operates at a low altitude are they loud?
- b. The report does not share all the different features of each land, air-ground craft and how each may affect each of the proposed areas. My comment on this is the MV-22 is a very loud and aircraft I feel upset every time I hear and feel one It rattles my home, my nerves, my insides. I completely oppose these aircraft on any and all of our islands and it is very unfortunate and unjust they were allowed in the first place to be stationed here.

Relevant Laws and Regulations 1.6

The public has had little time to respond or research to oppose each section adequately. It is unlikely the Navy's findings that the proposed action would not adversely effect our island is correct. Just from a small petition alone, we have over 2000 people that believe otherwise. I strongly believe this impacts all these laws and more and that the Navy's research lacks in all of these areas. Additionally, the report has not even correctly identified the sites or areas within the study zone on our island.

I would like to know if we as a community are entitled to any legal advice or representation to help us protect our community and enforce these laws? I believe these laws are being disregarded and research lumped into other studies done on other islands quite different than ours? Some of these laws or statues include.

- a. NEPA 42 U.S.C. Sections 4321-et.seq
- b. CZMA 16 U.S.C. Section 1451 et seq.
- c. Archeological and Historic Preservation Act NHPA
54 U.S.C. section 306108 et. Seq. Ch 3125
- d. Archaeological resources protection Act 54 54 U.S.C. section 306108 et.seq
- e. National Historic Preservation Act NHPA
- f. 54 U.S.C. Section 306108 et. Seq.
- g. Native American graves act and Repatriation Act. 25 U.S.C. 3001 et. Esq.
- h. National Maritime Heritage Act. As amended 54 U.S.C. 308701-13566
- i. Submerged Land Act 195 43 U.S.C> section 130 et. Seq.
- j. Hawaii Revised Statutes section 6E-8
- k. Magnuson-Stevens fishery conservation and management reauthorization act. 16 U.S.C> section 1801 migratory bird treaty act MBTA 16 U.S.C> section 703-712
- l. Comprehensive Environmental response and liability act. 42 U.S.C> section 9601 et. Esq.
- m. EO 12898 Federal action to address Environmental Justice in minority populations and low-income populations.
- n. EO 13045 Protection of the children from Environmental health risks and safety risks
- o. EO 013089 Coral reef protection.
- p. Can we be provided free of charge an attorney to represent our community?

In North the Kohala Community our quality of life is important to us and the reason many of us live so very far from the comforts of a chain store over 45 minutes away or even stop light. Our small towns represent a

quaint and quiet living environment. My family raised me on this Northern tip of the island and I raise my daughter here. I can't envision a life here with any of this proposal as a way of life. I would likely sell my home and not live here if this gets approval. I can't not have the stress these events would bring to our lives. It is my sincere hope that all our voices are heard and that all our concerns addressed.

We should not have to check the newspaper every day to find our islands drastically changing. A letter should be sent to each residence and the proposal should be broadcast on the nightly news. It is unfair to expect the community to constantly be on the lookout for the military to take over our islands. I have submitted approx 300 pages of prior paperwork from our community on the MV-22s in 2012 and ask that that also be included as I believe nothing has changed and I still oppose for the following same reasons.

Please look at the letter dated April 28th 2017, the United States Marines say no comment was explicitly objected to the 25 projected routine administrative operations per year. Clearly 300 pages and 500 signatures and they still couldn't tell we objected? I always thought of the military as protection honor and so many other good things. My view has greatly changed during this process to distrust, bullying and blatant disregard for humans, animals the environment and children. This process feels like a violation of my basic rights as an American.

No citizen should have to take so much time off work to try to fight proposals every five years. It is unfair and unacceptable to make changes like this without a community's consent. We DO NOT CONSENT to the military coming to our island for more training.

The same amount of time the Military had to prepare the report we should have equal time to dispute it. 30 days is not nearly time to inform just a handful of people and the burden has fallen with myself as a citizen make people and organizations aware. What type of transparency does the military think is honorable?

Just so we are perfectly clear I and the over 2000 people who signed my petition OBJECT TO EVERYTHING ON THIS PROPOSAL. The Navy should do what's right take NO action and not do any portion of this proposal as it will affect the lives of so many people, animals and the wonderful places we call home.

Mahalo for your time and attention to our concerns. Please let me know if we can arrange a community meeting in Kohala as well as a Kona meeting. Also please let me know of any developments and how I may respond to them.

Attachments:

Petition with over 2000 signatures and growing. This petition was also sent to your email link. 181 and more pages of comments and more online at. 74 pages sent to Hawaii address. All comments and discussions can be viewed at;

https://www.change.org/p/nfpac-receive-navy-mil-top-u-s-naval-special-warfare-command-joint-operations-on-hawaii-island?recruiter=9177569&utm_source=share_petition&utm_medium=copylink&utm_campaign=share_petition

Letter from Earth Justice RE. Environmental Review

Letter from Marine Core

May 2nd Press Release

Letters and comments from the community.

Many letters coming individually and not attached from organizations and citizens.

I very much look forward to your answering my questions and concerns.

Aloha Alyssa Slaven

Alyssa Adelman Slaven 12/5/2018

ackgift@gmail.com 808 889-5138 P.O. Box 1017 Kapaau, HI 96755

C.5 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter: Molokai Form Letter

A total of 1,649 individuals submitted a copy of the following form letter that opposes the Proposed Action and how it could impact the Island of Molokai. The Navy’s response letter follows the form letter.

From: noreply@123formbuilder.io
Sent: Saturday, December 1, 2018 10:09 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Draft EA- Navy Training Proposal- Molokai

Oppose the navy’s proposal to expand special ops training and conduct exercises in the near shore waters of south Molokai as well as potential air and land-based training. An increase in military activity on or around Molokai will be more harmful than beneficial to the island of Molokai, the interest of its residents, environments, cultural resources and subsistence practices. The residents of Molokai can expect significant negative impacts to our environment and lifestyle, if the proposed training occurs. Any additional comments can be sent to: NFPAC-Receive@navy.mil

I am opposed to the Navy’s proposal to conduct special ops training in the near shore waters of Molokai and any potential land based training on Molokai. Agree

I am opposed because the Military has a history of negligent and destructive training events on Molokai that resulted in irreparable damage and destruction of culturally significant sites as well as creating large areas of inaccessible and dangerous lands due to unexploded ordinances left behind. Agree

I am opposed to the increased potential for damage to marine ecosystems that could result from invasive use of submersible vehicles and other training activities that will interfere with important fisheries spawning activities and migratory patterns. Agree

I am opposed because the proposed training area is within the Hawaiian monk seal critical habitat area, and the Hawaiian Islands humpback whale national marine sanctuary. Agree

I am opposed because the proposed training area consists of numerous ancient Hawaiian fishponds and culturally significant sites that must be protected and because the proposed training activities would interfere with resident’s ability to practice subsistence fishing and gathering. Agree

I am opposed because the proposed training area encompasses what is the largest barrier reef in Hawaii. This fragile and impressive reef system is a significant natural resource that must be protected from activities that cause degradation and harm such as submersible vehicle traffic and other associated activities. Agree

I do not support altering the use of our near shore or onshore environments to accommodate for military activity. I ask that Molokai be removed from consideration for all training activities being proposed by the Navy and that for Molokai the no action alternative be enacted. Agree

Name Aisha Senas-Childs

Email

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DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

To Signer of Molokai Form Letter:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter and petition has been received and are included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. Based upon discussions with representatives from Molokai during teleconference calls on August 13, October 22, and October 29, 2020, the Navy reduced the training study area depicted in the Draft EA to two smaller areas along the southern coast of Molokai (see Figure 1-12 of the Final EA. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a study area for purposes of analysis and is greater in area than the sites where training activities would occur.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them

in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the potential impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA). The activities are similar to those conducted by the general public.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing recycling and disposal programs.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy assessed the potential effect of the proposed training on terrestrial and marine biological resources, including the humpback whale and Hawaiian monk seal and its critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. In accordance with the Endangered Species Act and Marine Mammal Protection Act, the Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

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April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Copy to: Hawaii Department of Land and Natural Resources

C.6 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter: Molokai Petition #1

A total of 6 individuals signed a petition that opposes the Proposed Action and how it could impact the Island of Molokai. The following is the Navy’s response letter to Beth King-Mack, the organizer of the petition. A copy of the original petition follows the Navy’s response letter.



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 6, 2021

Beth King-Mack
8033 Kam V Highway
Kaunakakai, HI 96748

Dear Beth King-Mack:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter and petition have been received and are included in Appendix C (Public Comments and Responses) of the Final EA.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the potential impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA). The activities are similar to those conducted by the general public.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The proposed training is in accordance with the Naval Special Warfare Command (NSWC) meeting its Title 10 U.S. Code Section 167 mandate and as discussed in Section 2.1.1 (Training Activities), all

training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices (BMPs), including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended material such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing characterization, recycling, and disposal programs.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R
.1229438936

Digitally signed by
ENG.SHERRI.R.1229438936
Date: 2021.04.06 15:08:01
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SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: Petition received from Beth King-Mack with signatures from 6 Molokai residents.

Copy to: Hawaii Department of Land and Natural Resources

Petition to Department of Land and Natural Resources in favor of banning all military, especially the planned Navy Seals', activity on Molokai

We the undersigned are opposed to allowing the proposed invasion of Molokai by the US military as planned by the Navy for the following reasons:

1. When the Navy informed us that they plan to use our south shore for military training purposes, they held no public meeting, but instead, gave the information to the media as "news." We received only that warning – that our ocean management strategies and limited resources were to be appropriated and used without due process, public testimony, or consent.
2. The continued destruction of our island and her resources demonstrated a lack of respect for Molokai and her people.
3. The last two years have been spent working on a community land management plan which is totally disregarded in the US plan. This puts our way of life, our future generations, and our ability to maintain Molokai as she has been and is supposed to be at risk.
4. Article 18 of the United Nations Declaration on the Rights of Indigenous People states that Indigenous People have the right to participate in decision making in matters which would affect their rights, through representatives chosen by those People, in accordance with their own People.
5. People of Molokai have a duty to protect our environment and our rights and responsibilities of ocean management. The US military plans to usurp these duties, rights, and responsibilities.
6. The US plan involves practices which jeopardize life on Molokai and the ocean surrounding her as we know it.
7. We cannot and will not continue to allow foreign business or the military to exploit and destroy our Island's resources.
8. The people of Molokai are the ones – not the US military – who will be left to clean up the damage done by the Navy Seals' activities.
9. We will not stand for this.

Name (Print)	Address	Signature
<u>Dustin Platter</u>	<u>78-6982 Waha rd. Hana</u>	<u>[Signature]</u>
<u>Beth King-Mock</u>	<u>8033 Kam V Hwy</u>	<u>[Signature]</u>
<u>MICHAEL CUATIS</u>	<u>10381 KAM V HWY</u>	<u>[Signature]</u>
<u>Lia Wolpin</u>	<u>10469 Kamv Hwy</u>	<u>[Signature]</u>
<u>Kealoha L.</u>	<u>_____</u>	<u>[Signature]</u>
<u>Nelson P.</u>	<u>_____</u>	<u>[Signature]</u>

ENCLOSURE

C.7 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter: Molokai Petition #2

A total of 139 individuals submitted a form letter that opposes the Proposed Action and how it could impact the Island of Molokai. The following is the Navy's response letter to Mahaina Poepoe with a December 16, 2018 petition organized by Judy Caparida. A copy of the original petition follows the Navy's response letter.



DEPARTMENT OF THE NAVY
COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH HI 96860-5101

5000-45E
N45
April 12,

2021

Mahina Poepoe (mahinal@hawaii.edu)

Dear Mahina Poepoe and Judy Caparida:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter and petition has been received and are included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

The Navy is not proposing to militarize the Hawaiian Islands. The proposed water-based Naval Special Warfare Command (NSWC) activities that would occur within the Molokai Study Area are similar to swimming and diving, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

2021

The Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures, however public meetings are not a requirement for EAs. State regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (Hawaii Administrative Rules Section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today, from November 8 through November 10, 2018, and once in *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy received your January 4, 2019 comments on the November 2018 Draft EA for the proposed NSWC training. Unfortunately, your letter was inadvertently misfiled and, once discovered, you were contacted via email/phone and set up three telephone meetings (13 August, 22 October, and 29 October 2020) to discuss your concerns about effects of the proposed training on historic properties. The notes from those meetings are attached as Enclosure 2. The Navy has provided a letter to the Hawaii SHPO summarizing these telephone meetings and to provide a record of the parties consulted with after the issuance of the May 2020 concurrence under NHPA Section 106. In addition, the Navy will work with responsible state agencies to address HRS Chapter 6E compliance where applicable and Native Hawaiian Organizations' comments may be solicited and considered at that time.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

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April 12,

2021

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosures: 1. January 4, 2019 cover letter from Mahaina Poepoe with a December 16, 2018 petition organized by Judy Caparida containing 139 signatures.
2. Meeting notes from August 13, October 22, and October 29, 2020 teleconference calls between interested Molokai parties and NSWC and EA personnel.

Copy to: Hawaii Department of Land and Natural Resources

January 4, 2019

Aloha Mr. Lemmo,

Enclosed please find a petition with 139 signatures opposing proposed navy training on Molokai. This petition was circulated around the island of Molokai by Molokai kupuna, aunty Judy Caparida and is submitted on her behalf and the behalf of all the signers.

Aunty Judy can be contacted at (808) 558-8558

Please feel free to contact me as well if you have any questions or concerns, info below.

Mahalo, Mahina Poepoe

mahinal@hawaii.edu
(808)658-6010
PO Box 173, Kualapuu HI 96757

RECEIVED
OFFICE OF SUPERVISION
AND CAPITAL LABS

2019 JAN -7 A 10:05

NATIONAL ARCHIVES
STATE OF HAWAII

December 16, 2018

Department of Land and Natural Resources
 State of Hawaii
 Samuel Lemmo
 Office of Conservation and Coastal Lands Administrator
 1151 Punchbowl Street, Room #131
 Honolulu, HI 96813

OFFICE OF CONSERVATION
 AND COASTAL LANDS

2019 JAN -7 A 10:05

OFFICE OF CONSERVATION
 AND COASTAL LANDS
 STATE OF HAWAII

We are not asking you to not use our island for military purposes, we are telling you that the military have misused our island in the past and continues to pose a threat to our Hawaiian people and their cultural practices. Unexplored ordnance, military waste and bunkers on the west end of the island are a concern. Increased military use of the airport and airspace above residential property are an urgency concern.

The current military proposal would disrupt breeding grounds of the native monk seal, endangered species, and movement along the coast could endanger plants, especially ferns only found in few locations on the planet. Your activity will interfere with our fishing rights, and collection of food. This is proposing to use our limited facilities for your own progress.

Proposal states that you would use submersible craft or water craft such as jet skis or small boats. These rubber replica weapons are found to be deployed and lost at times to remain and litter our ocean floor already covered with numerous cables. Accumulation of debris left by other is in major problem on this island.

As elders, we hold our land as sacred. We are the stewards of the island, its resources and the surrounding ocean. We hold the responsibility for management of the resources you seek to violate. We also have the highest level of poverty, unemployment, disabled persons, health issues, suicide, and economic deprivation as a result of lack of respect for our Hawaiian population and our indigenous practices.

Military planned "training" is a direct assaults on our island its resources and people. We remember Pearl Harbor being used as collateral damage in WWII and we have no intention of allowing Molokai to become collateral damage to unwanted militarization.

Do you have or have you sought the permission of our elders? Have you presented your proposal before our Aha Kiole or community? The only information I received was in the local newspaper and a statement that there was a copy of the proposal in the library, with an issue of this level there needs to be a **public meeting** where people can give direct positioning.

A lack of respect for our people and our ways seems to continue the colonial pattern of planting you flag on our ground and taking our resources without due process or consent. Hawaii is first a Nation! (Geneva and Hague Convention Article IV, 1949 and 1907). This is an act of war crimes.

Respectfully Submitted,

*Antie Hwang
 John Hwang*

ENCLOSURE 1

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Thursday, August 13, 2020

Time: 1435-1600 (Hawaii time)

Location: Teleconference

ATTENDEES

NAME*	ORGANIZATION*
MOLOKAI REPRESENTATIVES	
K. Rawlins-Fernandez (KRF)	Vice Chair, Maui County Council
L. Buchanan (LB)	Molokai Aha Kiole
T. Kehaulani Watson (TWK), Vice President	‘Aina Momona
W. Ritte (WR), Exec. Director	‘Aina Momona
Mahina Poepoe (MaPo)	
J. Caparida (JC)	
Sol Kawoohalahala (SK)	Lanai Representative, Chair HWNMSAC
M. Akutagawa (MA)	Molokai Representative, HWNMSAC
C. Schnackenberg (CS)	Ahonui Homestead Association
NAVY REPRESENTATIVES	
J. Bigay (JB), PM and NEPA Planner	NAVFAC Pacific
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
C. Rasmussen (CR), Archaeologist	NAVFAC Pacific
R. Rowland (RR), Assistant Counsel	Navy Region Hawaii
CWO E. Alvarado (EA), SEAL Training Officer	U.S. Special Operations Command
R. Spaulding (RS), PM	ManTech International Corp.

Notes: * HWNMSAC = Humpback Whale Nat'l Marine Sanctuary Advisory Council NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager; SEAL = Sea, Air, and Land.

Purpose

The purpose of the call is to follow-up with Molokai representatives and residents regarding their comments on the November 2018 Draft EA for NSO Training in Hawaii. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

JB: welcomed everyone to the call and provided a quick introduction to the attendees (see above table) on the Navy side and their role in the EA process. Requested that everyone provide to JB via email their name and group name so that we ensure that we have accurately recorded all attendees. The purpose of our call is to follow-up with you regarding your comments on the Draft EA for Navy Special Operations (NSO) Training in Hawaii published in late 2018/early 2019. We want to be sure that we have addressed your concerns particularly with respect to the State of Hawaii Chapter 6E⁽¹⁾ process. This is a joint Department of Defense NEPA and state of Hawaii HEPA document. The team here today is not authorized to make

⁽¹⁾*Note:* After the phone call, the Navy determined that these discussions are not under the 6E process. These consultations are to support the HEPA and NHPA Section 106 processes and to obtain information from stakeholders, agencies, and interested parties regarding their concerns regarding the proposed training activities.

ENCLOSURE 2

any decisions or changes to the proposed action in the EA at this time, but are here to listen and record your concerns. We will respond to you via letter, which will become part of the Final EA. We are hoping to keep to the scheduled time and have the call end around 4 pm. If we need to, we can schedule another call at a later date and time.

MP: provided an overview of the proposed NSO training in Hawaii. She will then turn it over to EA to explain the training.

- Naval Special Warfare has been conducting training operations in Hawaii since the mid-1990s. Hawaii was chosen due to warm water and proximity to numerous military assets throughout the state of Hawaii. Have trained on all the neighboring islands but mainly Oahu.
- As shown in the EA, there is a large purple training study area along the southern coast of Molokai. This was done for several reasons. (1) It was simply a study area. It was difficult to analyze a particular area for wave action if that wave action covered a larger area. (2) We could not show the specific training sites as that would be considered pre-decisional. If we noted a specific spot, then our analysis was focused only on that location. (3) We do not know if the property owner for a particular area will allow training in that area until we complete the EA process. Then we can go out to the private, city, county, or state level. We have to have the environmental process completed before we could ask for permission for a particular site. In addition, if a particular site is chosen and approved as a training site at the end of the EA process, if in a year, 5 years, etc. the landowner decides they no longer wish to have NSO training on their property, the Navy can go back to the analysis within the larger training study area and consider other sites that could potentially support NSO training that were not carried forward during the initial EA process. Allows more flexibility.
- We can only conduct the training that is proposed in the Final EA and cannot deviate from the Final EA.
- I will now turn it over to CWO Alvarado to explain the type of proposed training. For Molokai, only water-based training would occur – no training on land and no training in the air with aircraft. Only 2 harbors are proposed for use along the southern coast.

EA:

- Overall intent of training is for SEALs to train in an environment they have not seen before. Goal of the proposed SEAL training is to conduct the operations without being detected. Typically, SEAL divers are accompanied by 2 safety vessels at all times. These will be identifiable by dive flags or dive lights. We will not go into any area without proper approvals. This means contacting the harbor master and local law enforcement. They will typically be present during the training. A safety officer will oversee the training as well as a medical officer in case there is an emergency. We work with local boaters and fishers, to ensure that we are not impeding the public. We often come up to fishers or others to explain what we are doing if we have divers in the water.
- There will be no form of “beach invasion.” No more than up to 18 trainees would be in the water at any one time.
- The overall scope or grading for the trainees is to remain undetected. Typically, when we have done training throughout the Hawaiian Islands no one knows we were even there. Goal of trainees is to leave no trace of their presence during and after training.
- They are trained to go into an area silently, and move out without being detected.

MP:

- Goal of the proposed training is to leave no trace of the training while it is happening and after it has been completed. No intent to close any harbor while training is occurring. Training occurs between sunset and sunrise. There will be two <25-foot support boats (rigid-hulled inflatable boats [RHIBs], similar to a Zodiac or similar inflatable boat) offshore. Support personnel will watch the trainees and ensure their safety, other personnel will watch for civilian boat traffic. The public will not be denied access to any area and no area will be closed during training.
- If during a training exercise a commercial or recreational fisherman or other user begins to move towards the training area, the support watch personnel will monitor the boat’s activity. If a

fisherman or other user comes too close to a training activity, they will be informed that a Navy training activity is underway and may be asked to stop. If they do not wish to stop, then the training will stop. The training activity will either be halted momentarily until the fisherman or other user leaves the area, or the training will be stopped and the Navy personnel and trainees will leave the area. The goal is to never disrupt or stop any civilian activity during a training activity.

- Molokai harbors are attractive for training purposes because they are small, trainees have not seen them before, and they are not lit at night like harbors in Honolulu. They present a challenge.
- Training could occur in Molokai waters up to 10 times/yr. We are not expecting to train at that level in Molokai waters, only 2-4 times/yr; the level assessed in the Draft EA is a maximum.
- In addition to diver/swimmer training activities, also proposed use of a small 21-23-ft long electrically powered submersible. Trainees will maneuver the submersible in accordance with a training scenario, exit the submersible, swim into the harbor, conduct the training, and then swim back to the submersible, re-enter, and then exit the area. The sonar on the submersible that is used for navigation is equivalent to a standard off-the-shelf fish finder that is used by commercial and sports fishermen.
- The main training is diver/swimmer entering a harbor from the ocean.

JC: Sounds spooky, watching TV. Our community lives off the ocean. You did not prepare a good Environmental Assessment. [she mentioned a location Halena? And if the training was near there – hard to hear]

JB: Is that on the same side as Kaunakakai?

MaPo: Aunt Judy I think it is between Kaunakakai wharf and Hale O Lono Harbor.

JC: I don't know about that. Would be better to see people and talk in person. I will hear you guys out.

MP: We are proposing the 2 harbors: Kaunakakai and Hale O Lono. These are the only areas where we are proposing to train, respectfully train.

MA: *Do these activities include sonar, what exactly do the special ops activities entail? (Question 1 [Q1], see Response to Questions below) Two, I would like a briefing with the Humpback Whale Sanctuary Advisory Council because you have not consulted with us at all [Q2, see Response to Questions below]. Three, I was given a picture of a submarine came out of the water offshore of Molokai and concerns were expressed that activities were already taking place. Whales were behaving abnormally, keeping heads out of the water. Helicopters were overhead observing. Also concerned that you did an EA a while back and did not consult with the Humpback Whale Sanctuary Advisory Council. I don't want this to be you are just informing us and then go ahead and approve the EA. Finally, there is a significance criteria. If there are no significant impacts, then it can remain an EA. I believe there are significant impacts to people of Molokai and the Humpback Whale Sanctuary and an EIS is warranted. Those are my comments and questions.*

KRF: Is this call being recorded and can it be shared with us.

JB: No, it is not being recorded, we are taking notes.

KRF: Will the people attending this meeting be able to review the notes?

JB: That is not something we normally do. We will address your concerns and comments in a letter back to the participants.

TKW: This is not very good practice to take notes and keep them internal. They should be shared with the participants so that they can say if they are accurate. *What are you considering this consultation for? An EA does not require consultation. Is this 6E, 106, or preparing for something else? What legal authority is this consultation for? [Q3, see Response to Questions below]*

JB: It's under 6E⁽²⁾. The State's HEPA regulation.

⁽²⁾Note: After the phone call, the Navy determined that these discussions are not under the 6E process. These consultations are to support the HEPA and NHPA Section 106 processes and to obtain information from stakeholders, agencies, and interested parties regarding their concerns regarding the proposed training activities.

TKW: HEPA and 6E are different laws. You can't conflate the 2. You don't mention 6E in the Draft EA. The EA is totally inadequate and you should reissue a Draft EA before moving to a potential FONSI. *If this is consultation under 6E, then you have made determination that there are significant sites under criterion E. Has that determination been made? [Q4, see Response to Questions below]* You have not provided an inventory of historic sites. Can you explain, as it doesn't make sense?

CR: We have identified a number of historic properties on Molokai and are aware of a number of fish ponds along the shore as well as fishing areas. We would like more input regarding your historic properties and cultural resources. One of the reasons we would like to talk with you. We have done a lot of research with the SHPO and spent a lot of time in their library reviewing records. We understand this does not come close to what you all know on Molokai. We wish to hear your concerns.

TWK: You are conflating 2 separate laws. 6E consultation is specific. Responsibility of identification of sites falls on the Navy. Under Section 106 identification is done as part of the consultation process. If this is 6E, should have been managed better. Should be clear that this is 106, and those should be made available to us and we need to approve. Unclear that you don't have an understanding of the state and federal laws. If you are doing an inventory, then we need to see a draft of that inventory, including previous studies and sites in map form. If you determine that sites are eligible under 106 under criterion E, then you do HRS 6E consultation. If this is 106, then the Navy needs to restart and do it properly. This is not how 106 is done. We should have received notice that this is a 106, calls to NHOs. Concerned that this is a haphazard consultation and used in a manner that we have not consented to. Urge you to have an internal meeting to understand the different statutes and to proceed in a more orderly manner.

MA: ACHP has issued guidelines that triggers Sec 106, they must also follow the UN declaration of rights of indigenous peoples. Requires prior informed consent. This framework needs to be followed to work with NHOs and you did not do that.

CS: I agree. If you are working under 6E, then something has already been determined. My concerns are: our kupuna are still doing subsistence gathering during low tide in the area of proposed training. The consultation should not be with selected leaders of Molokai, but should involve the community. The community needs to be notified and be part of the process. Also concerned about frequency and timing of the training. I am against it. I have not seen the full EA and all of us need to have it in hand. You represent the military and the people of Molokai are not in good terms with military. Trust is a big issue. Preservation of fish ponds is important and restoration is top priority. If we are to follow 6E then I agree with the previous speaker. The entire community needs to be involved and not a private meeting.

MP: No more than 2-4 times/yr and several hours each time to allow divers to enter and exit the harbors. No other activities.

CS: It's important to consider the season, not just frequency.

MP: Do you have particular seasons that need to be avoided?

CS: We have experts for gathering rights. Several areas where we harvest and where we do not harvest. There are always year-round seasons of harvest.

TWK: All of these questions. If you are going thru DLNR, you have an obligation to fulfill that analysis. This is not the appropriate forum to conduct the ethnographic work. I am concerned you do not have an understanding of the legal requirements that are in place for this type of work. I would strongly urge you to speak with someone about all the laws you need to comply with, including case law. There does not seem to be a clear understanding of what needs to be done.

MA: There needs to be a proper inventory of resources that impact Native Hawaiian rights and practices. Subsistence fishing and gathering and fish ponds need to be inventoried, then an assessment of how the proposed training would impact these resources and practices. Then there is a mitigation step to ensure that these rights and practices are protected. As a federal agency there is a fiduciary responsibility under the ceded lands trust (state waters) and given training will occur in state waters there is a public trust obligation under state law that includes native Hawaiian rights, resources, and practices. That is the proper methodology you should follow.

WR: Most of the items previously mentioned were outlined in our earlier comment letter. I wanted to talk about the history of military use on Molokai. I am 78 yrs old and there have been many times that the

military came to train on Molokai and all ended up with many problems. Huge fires, lot of traffic. Also the training on Kaho'olawe, and there are a lot of young people not happy with how lands on Pohakuloa are being used and also on Oahu. The military is not something we have high regard towards. They fight the wars for oil and stuff. Today you have heard all of things you have to follow in order not to get sued by the people of Molokai. There is no aloha to allow you guys to do what you want to do. The amount of times you want to train on Molokai is worth the time and money you will have to put in. Whether you do a 106 or 6E. Take a look at what is happening at this meeting, recommend you train in a different area. Thank you for allowing my comments.

CS: Mahalo for presenting to us. *In the event you don't follow through what you agreed to do, will there be a penalty or violation imposed on you?* [Q5, see Response to Questions below] I wanted to put this on the table.

MaPo: Published testimony online and was sent to testimony address, and collected over 1,600 signatures in opposition to the training on Molokai. Will you be responding to each of those people individually?

JB: There was a public comment process on the Draft EA in late 2018 and early 2019. That comment period has ended. We will respond to that testimony in the Final EA.

MaPo: I agree with the previous speakers regarding the consultation process. There is heavy opposition in the community to the proposed training. While we will participate and remain involved, but we will protest. It's the military and we have had bad experience in the past. People still finding bombs while mowing their lawns. Suspect that training is already happening without us knowing it. I understand that it may be only 2-4 times/yr but things will change. I do see it as taking of turf. We are trying to minimize military presence on island and waters. Military overflights at 11 at night that wake us up. Thank you.

WR: What are the next steps?

JB: The next step we will be processing 6E⁽³⁾ and satisfying that requirement and finalizing the EA. It will then be sent up through Navy channels to be approved. After that it will be sent to the State of Hawaii/DLNR for the HEPA process. It is then their decision whether they approve it.

MaPo: What is the timeline for the final document? For the support vessels, will there be armed people on the support vessels?

CWO EA: No, none of the trainees will be armed.

MaPo: Yes, no guns on the support vessels.

JB: Timeline for finishing the process is expected the end of the calendar year, but the exact timeline is uncertain at this time.

SK: I wanted to defer comments to the Molokai community. But we share the same waters that connect us in Maui Nui. I wanted to share a few comments. I support MA about the need for this information to be brought forward to the Humpback Whale Marine Sanctuary Advisory Council. I serve as chair of the Council, and *we are making a formal request that the Navy makes a presentation to the Council because you are within the sanctuary waters.* [Q2, see Response to Questions below] We take seriously the kinds of impacts that might be involved with anything to do with the kohola (humpback whale). It is something we expect and look forward to that meeting. The conversation and your presentation make it seem that your training within the realm of the Sanctuary are not invasive. If we had a conversation at a Hawaiian level, you would be surprised to hear that some of the simple actions that you assume to be noninvasive, might be so detrimental from a Hawaiian's perspective. None of the Hawaiian knowledge and understanding of place has been incorporate into any state, county or federal laws. Hawaiians have been left out of the

⁽³⁾*Note:* After the phone call, the Navy determined that these discussions are not under the 6E process. These consultations are to support the HEPA and NHPA Section 106 processes and to obtain information from stakeholders, agencies, and interested parties regarding their concerns regarding the proposed training activities. If a FONSI is issued under HEPA, the Navy will work with our Real Estate Office to obtain rights of entry. The 6E consultations will support this process.

conversation for these kinds of policy decisions. Moving forward we are in a time that requires much more consideration of the native peoples and their knowledge and practice of place. Carrying on things like the conversation we had today, the status quo, is far from reality. Need to make a paradigm shift as native peoples have contributions to make regarding their environment, resources, and homes. These types of training activities are not where we want to go. To continue to assume that the military has a need to continue this practice, we have an obligation to listen, give input, and then allow you to go do what you want. Without any contributions from native peoples. Without these considerations we do not see the kind of reality we see. The military needs to understand that we have been part of this place for thousands of years and your actions may be more adverse than you realize. In the meetings, you are trying to get us to provide you with information so you can make your decision. It shows you lack the understanding of who we are as a people. It is no longer acceptable that you assume these are practices that need to continue moving forward.

JB: Thank you for the comment.

TKW: Why haven't MA questions been answered, *what is the purpose of this meeting, what box are you checking off when meeting with us, and when do you plan on having a meeting with the community?* [Q6, see Response to Questions below]

LB: You have heard from only a few of us, but we have been doing this for all our lives. We've learned the process and know the process. *What is the purpose of today?* [Q6, see Response to Questions below] I wanted to tell CS that this was not a private meeting but we were contacted by the Navy because we submitted comments. Others who submitted comments will also be contacted. Due to the covid restrictions, and not being able to have in-person meetings, we have relied on TKW, MA, and Sol and others. I am surprised that the Humpback Whale Sanctuary was not contacted for the EA. We got the EA late, in early 2019. We regularly check the OEQC website to see what environmental notices come out. The EA is voluminous. If this document is not amended, then you have the authority to implement everything in the document, which is way more than what was presented in the meeting today. No matter what alternative you choose, you will have all the options. I lived thru the Marine Corps MV-22 EIS, and if things are not clearly spelled out that you end up in a year or 2, helicopters or Ospreys that fly over the shoreline late at night, don't communicate with commercial airlines. I think we all support the defense of the US. Most of us have family members that serve proudly in the military. But we must also protect our resources and part of that is becoming very diligent in reading the EA and knowing the law, in order to protect our resources. You have to go back and have a discussion to determine how you work with NHOs and stakeholders that have responsibilities within the area of the proposed action.

Wanted to thank you for reaching out. We submit testimony over a year ago and then we get an email regarding our testimony. We all met as a group and called our Congressional representatives.

MP: I can respond to some of the items you brought up regarding training. The EA covers proposed training throughout the Hawaiian Islands with most training on Oahu. The training for the neighboring islands is specific, and for Molokai we are only proposing diver/swimmer and use of a submersible. No other actions. We cannot include other activities that are not in the EA. If we received permission to use the harbors, we cannot add over the beach training, aircraft training, etc. We can only stick with what we said in the EA and for which we have approval to do.

LB: A right of entry is a permit between the Navy and DLNR and is a separate document.

MP: We do need a right of entry but unable to request a permit until the EA is complete. We can only do the activities and at the locations as stated in the EA. There is a table that lists the specific activities for Molokai. Only diver/swimmer and insertion/extraction. We can only do the things proposed.

RS: Table 2-4 in the Draft EA. Page 2-34. Table 2-3 shows what is proposed for Molokai. Presents same information but in a different way.

LB: Do you prefer Alternative 1 or 2.

JB: Alternative 2 is preferred, but does not mean it will be chosen.

LB: Navy can invite partner trainees from any country that wants to train with you?

MP: No, we will train only with US military. No foreign powers. I will find the text.

LB: It doesn't matter at this point, as this is all superseded by the discussion today from those that testified today on the phone. Table lists up to 330 events per year on non-DoD properties.

JB: these are events across the islands, not Molokai.

LB: Maui, Lanai, and Molokai. Diver/swimmer and insertion/extraction.

MP: Inserting and leaving the submersible, swim around the harbor, then leave the area.

LB: Are you paying a fee to use a training area?

MP: We don't know until we finish the EA and request a permit for a particular site.

LB: In the other sites in Hawaii do you pay a fee for use of land for military training.

JB: In some cases, the military leases land from the state for training; long-term lease. But do not think there is any payment for water activities.

TWK: This is not a payment for water activities. You said you need a right of entry. Not clear why this is under OCCL (*Office of Conservation and Coastal Lands*). If you need a right of entry that is land division not OCCL. If it is OCCL you are stating you are triggering 183. I think we put it in the letter, you haven't said anything about needing a CDUP (*Conservation District Use Permit*) and you are proposing land-based activities in multiple areas that are conservation lands which would require approval from OCCL, which is your accepting authority. What are you seeking?

JB: We are working with the OCCL and they will work with the land division about issuing rights of entry.

TWK: That's not how it works. I've done this for 20 yrs. If you are seeking right of entry and not triggering 183, the proper entity is land division, not OCCL. If you are using harbors, that's DOBOR (*Division of Boating and Ocean Recreation*). Not sure I can get to a higher level of concern. You do not understand the different regulations that are in play, and have not answered my previous questions. I will follow up with an email.

MP: Regarding the question about foreign entities training. On page 1-1, purpose of the action, training could occur with other US military units for special operations training.

LB: This is a big document, with many layers of jurisdictional responsibilities, it's complex. You are doing hundreds of actions and you are trying to cover it all in the EA. Would you have to do a Programmatic Agreement?

TWK: This should have been a Programmatic EA. They may need to do a PA under 106. It's kind of a mess.

MA: It should have been an EIS. I don't know how they can say there will be no significance. Seems like a forgone conclusion that you are finalizing the EA and issuing a FONSI. You need to submit an EIS.

MP: The proposed activities are similar to those that already occur in the area: swimming and diving. Not introducing new elements. Sonar on the submersible is similar to that found on a fishing boat – fish finder.

MaPo: Small ship would be used to launch the vehicle.

MP: It's about 200-300 ft in length and would be several miles offshore. Purpose of the ship is so that launching only occurs in the water and no need to fly in or use land for launching submersible. In addition, the ship has a diving chamber in case there an emergency with a diver and they need to be taken to a dive chamber quickly.

CWO EA: The main activities that the trainees will be conducting are similar to those activities that tourists do every day around Molokai. No weapons.

MA: You are compartmentalizing the activities and conducting activities on many islands. You can't say it's negligible and issue a FONSI. It's disingenuous.

LB: Replying to the statement that you are doing the same things that are currently happening around the island. In the BMPs of the EA, for swimmer/diver, jet skis will be on site to provide safety coverage. Jet skis are frowned upon, and rarely used around Molokai. Jet skis impact fishing areas. They are not used in the areas you are proposing. Regarding BMPs and what will be done regarding ESA-listed species. Keep distance and have a marine mammal observer. You state that the marine mammal observer will make a determination as to whether a proposed activity will affect a species. With a document this big and everything is thrown into it, this is a concern. Fire rescue has jet skis, but no one else.

MP: Each vessel will have a person trained in marine mammal observation. Jet skis will be used only in an emergency.

MA: The fact that endangered species may be affected, this is a significance criteria and triggers an EIS.

TWK: Give you some advice. This call did not go well. You have some excellent people at the Navy who are excellent and should be involved. Kaipō Perez – excellent, PhD in biology and very good with community. Have a conversation with him. Also recommend Jeff Pantaleo. Outstanding archaeologist in Hawaii for 30 yrs, is outstanding, and knows the state and federal laws. You need to go back to drawing board and map out your requirements, why taking the steps, and what is entitlement process. This is the most convoluted EA I have ever seen in 20 yrs. Navy typically does better documents than this and I am surprised and disappointed. Decide your direction. I will communicate this out to the people I will brief about this call.

MP: We are working with Kaipō Perez and Jeff Pantaleo and they are heavily involved in this process.

TWK: I would recommend having them on this call. Many of the questions we had could have been addressed by them. Recommend having them on future calls.

JB: Getting to the end of the call. We have a lot of homework to do. Thanks for your time.

KRF: Are we getting a copy of the notes?

JB: We will provide a response to your comment letters. We will update with the new information and all will go into the Final EA.

KRF: When will be the next meeting? Requesting a copy of the notes for all participants.

SK: At the beginning of the call, you stated that if we needed additional time that we could schedule another time to address further issues and provide clarification. I don't think this call is completed, and we seem to be putting an end to it. What about your comments about continuing at another time?

CR: Let us know what time is good.

MP: Will Tue at 2:30 work?

SK: You need to ask all the participants.

MA: If we meet again, there needs to be a response to the questions we asked today. There needs to be evidence of corrective actions that shows you have taken our comments into consideration, you've addressed the issues, and you will bring further experts to the next meeting. Don't agree that this will just be included in the Final EA. That invalidates everything we have said. Need a follow-up email listing the concerns with a list of action items for next meeting. Bring in the people that can help answer the questions. Bring in interested parties.

RS: It will take us some time to compile the notes, compile the questions that need to be answered, and to provide answers. We need some time to digest your concerns and have responses prepared so that we are more informative during another meeting. Once we compile the notes and action items, we will send those out and then request a time and date to set up another meeting. Will that work for everyone?

MA, LB, SK: Yes, thank you.

Aloha.

Response to Questions

Follow-up answers to some of the questions asked during the phone conference.

Q1. MA: Do these activities include sonar, what exactly do the special ops activities entail?

Navy Response: Submersibles use a sonar device to report depths to aid in navigation and to detect and avoid marine species during a training activity. These devices have similar specifications to commercially available “fish finders” and other hand-held sonar devices. A complete summary of the proposed training activities is provided in Chapter 2 of the 2018 Draft EA.

Q2. MA: Two, I would like a briefing with the Humpback Whale Sanctuary Advisory Council because you have not consulted with us at all. We are making a formal request that the Navy makes a presentation to the Council because you are within the sanctuary waters.

Navy Response: The following text has been added to the Final EA: All of the military activities the Navy proposes to be conducted in the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final EIS/Management Plan for the Sanctuary, which under the Hawaiian Islands Humpback Whale National Marine Sanctuary regulations do not require permits or further consultation under section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The activities proposed in the EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 Hawaii-Southern California Training and Testing Final EISs/OEISs and, therefore, consultation is not required.

Q3. TKW: What are you considering this consultation for? An EA does not require consultation. Is this 6E, 106, or preparing for something else? What legal authority is this consultation for?

Navy Response: The intent of the calls was to follow-up with stakeholders, NHOs, and interested parties that provided comments on the Draft EA and these discussions will support 6E consultations.

Q4. TKW: If this is consultation under 6E, then you have made determination that there are significant sites under criterion E. Has that determination been made?

Navy Response: The Navy is reaching out to Molokai representatives and residents regarding their comments on the November 2018 Draft EA for NSO Training in Hawaii and to see if there are any additional questions or concerns regarding cultural resources. Following completion of the EA under HEPA, appropriate significant assessments will be undertaken when 6E consultations are conducted as part of the right-of-entry and/or real estate agreements process, including consultation with ethnic organizations or members of the ethnic group for whom some of the historic properties may have significance under criterion “e” to seek their views on the significance evaluations.

Q5. CS: In the event you don’t follow through what you agreed to do, will there be a penalty or violation imposed on you?

Navy Response: If the Navy does not follow what it has agreed to do in the Final EA, and there are adverse impacts to historic properties, then the Navy is required to inform the Hawaii SHPO; the Navy would work with the SHPO to determine appropriate mitigations to resolve the adverse effect.

Q6. TKW: What is the purpose of this meeting, what box are you checking off when meeting with us, and when do you plan on having a meeting with the community?

LB: What is the purpose of today?

Navy Response: See notes for Q3.

Items to be provided to the Navy from Molokai representatives:

1. Complete list of individuals that were on the call and their affiliations so that we can accurately reflect attendance in the project record.
2. T. Kehaulani Watson: You do not understand the different regulations that are in play, and have not answered my previous questions. I will follow up with an email.

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Thursday, October 22, 2020

Time: 1100-1230 (Hawaii time)

Location: Teleconference

ATTENDEES

NAME*	ORGANIZATION*
MOLOKAI REPRESENTATIVES	
L. Buchanan (LB)	Molokai Aha Kiole
T. Kehaulani Watson (TKW), Vice President	‘Aina Momona
M. Poepoe (MPo)	
P. Nihipali (PN)	
C. Schnackenberg (CS)	Ahonui Homestead Association
NAVY REPRESENTATIVES	
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
CWO-4 E. Alvarado (EA), SEAL Training Officer	Naval Special Warfare Group THREE
J. Bigay (JB), PM and NEPA Planner	NAVFAC Pacific
C. Rasmussen (CR), Archaeologist	NAVFAC Pacific
J. Pantaleo (JP), Acting Cultural Resources Manager	NAVFAC Hawaii
R. Spaulding (RS), PM	ManTech International Corp.

Notes: *NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager; SEAL = Sea, Air, and Land.

Purpose

The purpose of the call is to follow-up with Molokai representatives and residents regarding their initial comments on the November 2018 Draft EA for NSO Training in Hawaii, and to continue the discussions that were started in our August 13 teleconference. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

MP: Who joined?

MPo: Hi this is Mahina Poepoe again.

JB: Other than Kunani is there anyone else on the line from Molokai?

LB: This is Lori Buchanan.

PN: This is Punani Nihipali.

TKW: And this is Trisha Kehaulani Watson, uncle Walter asked me to be here for ‘Aina Momona.

JB: Aloha, welcome.

MPo: Hello this is Mahina again letting everyone know that I am recording or attempting to record and if anyone has an issue with that then you can let me know and I will stop.

LB: Hi John this is Lori from Molokai. We waiting for anybody else? I think from our side we have Trisha representing Walter and myself and Mahina, Cora, I don't know if Cora is joining us, if Cora is on the phone. Punani, and then from your side. Keani Rawlins-Fernandez is in another meeting for the county. She cannot join until noon but I told her we might be done, I don't know.

JB: Alright then if we are all ready to go, we can start and if anyone joins us along the way that's fine. Alright I will start with the introductions from our side, most of the people you've meet from the previous call. I will start with myself, John Bigay, from Naval Facilities Engineering Command Pacific at Pearl Harbor. I am the NEPA planner for this project, NEPA is the National Environmental Policy Act, and my job is to support getting the Environmental Assessment completed along with assistance from our contractor and that is ManTech International and that is represented by Rick Spaulding. He is the project manager for ManTech on this project and a senior wildlife biologist. Are you there Rick?

RS: Aloha.

JB: We have Margherita Parrent she is the project manager and Deputy Facilities Director and Environmental Coordinator for Naval Special Warfare Group Three.

MP: Aloha everyone and thank you for joining us.

JB: And also we have Coral Rasmussen from NAVFAC Pacific, Archeologist.

CR: Hi, welcome.

JB: And archaeologist Jeff Pantaleo from NAVFAC Hawaii

JP: Aloha everybody, thank you for joining us today.

JB: And CWO Alvarado, are you on the line.

MP: He's not on the line yet, he is stuck in a meeting and trying to desperately join us.

JB: He is from the Navy SEALs as well, so hopefully he will be able to join us. Robert Rowland are you on the line? I think Robert had another phone call that came up in the meantime. He is assistant counsel from Commander Navy Region Hawaii. And did I miss anyone who is online on the Navy's side? Okay. The reason for our call is to make sure that everyone on the previous call got a chance to review the minutes that we sent out and the comments, and we answered some of the comments that were brought up during that phone call on the minutes that we sent out. And make sure that there is, there are no further questions on that and that everybody understands them. Any questions or comments? And before we go into that, just make sure we have the listening right for who's on the line so that's Mahina Poepoe, Punani Nihipali, Lori Buchanan, and Trisha Watson. Anyone else joining us from the Molokai side? Okay. I would like to let Jeff Pantaleo talk about his role on this project. Jeff, the archaeologist for NAVFAC Hawaii, since he was asked about on the last phone call. Jeff has another commitment so I want to let him go first and introduce and give his role in this. Jeff?

LB: Hey John, before we move to Jeff. Hi John this is Lori from Molokai, before we move to Jeff you brought up the minutes of the meeting we had on August 13th and asked if anybody had any questions. I do have a comment for the record. For the record, I believe we asked if the discussion was being recorded, you said no, you said you were taking notes. From the notes of the meeting I just wanted to comment that I don't recall some of the stuff that you added into there was not discussed in that meeting such as the notes about, subsequent to the discussion it was determined. I don't recall you stating that but it's in the minutes now. That's why I asked Mahina to take a recording of the meeting because I don't want to belabor the minutes right now of the August meeting. Just to state on the record that I did not concur with some of the discussion maybe because I couldn't remember and it's not verbatim. I think that from today on you guys should decide if you are going to record the meetings or do them verbatim and if not, we are recording the meeting for our purposes as well. That's it, thank you.

JB: Okay quick response to that, Rick, you wanted to respond?

RS: Yeah, I was the notetaker and I am fairly good at taking shorthand and am fairly thorough in terms of my notes but just an FYI the subsequent discussion was included after the fact that's why it is in parenthesis and italics. It was determined after the call that we weren't consulting under 6E so I just want to make that clear in those instances where 6E was mentioned during the call. It was after the meeting we acknowledged that and it's not reflected that that was said during the meeting. It was included and inserted after the meeting and that's why it's stated as such "subsequent to the meeting" that was added.

LB: Okay, is it safe to assume the notes and italics then throughout the document are of the same caveat? Because I notice in other areas they're the same notes.

RS: No, it's just the two instances where it says the subsequent to the meeting and its only related to the two or three instances where we mention 6E. Otherwise everything else is just in those instances only where they are in parenthesis. Everything else is from the actual meeting.

LB: Okay, thank you.

TKW: I really do want to get to Jeff and I agree with Auntie Lori, I don't want to belabor this but what was the purpose of last meeting then?

JB: The purpose of what?

TKW: The last meeting. It's in here that it was a 6E consultation, so then what was it if it wasn't a 6E consultation.

JB: It was consultation under HEPA, the state's Environmental Protection Act so we were actually consulting under HEPA.

TKW: Okay let's get to Jeff because I am very excited to hear from Jeff because I am hoping he can shed light on, well everything.

JP: Okay I will try to do that. Thank you everybody for being on this call today it's important for us to continue our consultation. My role, I am the Acting Cultural Resources Manager for Navy Region Hawaii. I work with NAVFAC Hawaii on environmental planning and in fact I am the acting supervisor for a while too, so I have been kinda busy, I apologize for having to leave early. My role is cultural resources support and working with Coral Rasmussen closely on this project. Just a little background, I have been working with Coral Rasmussen for over 30 years which is amazing to think about. I've seen her on many projects as a principal investigator, supervisor so I know the work she does and I have all the confidence in her ability. As the one who oversees the cultural resources, if I had any doubts or questions, I would have brought them up earlier. But I have just a lot of confidence in her abilities so if you have any questions please let her know, and her and I talk about these issues and try to get back to you as fast as we can. I just wanted to give you a little background to that. If anybody has any questions for me know I would be happy to answer them now could also answer emails too.

TKW: I am trying to look through all of this and I don't know Coral but I know you're a wonderful archaeologist and you've done this in Hawaii for ages. And I don't mean that in a negative way, sorry, that came out wrong. Two things, one it doesn't look like there was consultation on 106. If this is a joint NEPA-HEPA document, I have questions about the 800.4 identification requirements under 106 specifically. So that's why I think when I said there was 6E, which I do know that you only go into consultation because you've identified there are historic properties that are significant under criterion E. I don't quite understand where we are in the process and also the cultural impact assessment for the Act 50 stuff doesn't seem to have been included in the HEPA document. So that's what I am hoping you can untangle is as you all know there's usually like 5 different, there's NEPA, HEPA, 6E, 106, and Act 50 all kind of converge on projects like these. I am hoping you can shed light on untangling it because that certainly didn't happen last time.

JP: Okay maybe Coral could help answer that question too. You know we do 106 consultation initially, and because we are not working on federal property, we are working on private and state we can do the section 6E process so there were actually 2 consultations being conducted for this project so we could cover both the federal land and the private and state. Does that answer that question?

TKW: I think so but I know our NHO came in specifically asked to come in as part of the 106, so that's why we thought the last meeting was 106. I wasn't too clear with you what that formal consultation process will look like. Is that a separate set of meetings because there are certainly historic properties, we believe are eligible for the National Register that we would want to discuss.

JP: Okay yeah. Coral, we did the 106 consultation, that is correct, right?

CR: We did because that's Section 106 is different than the 6E. Under 106 is in regards to the impact the impacts that you may have on the historic properties. 6E is a little different in this case 6E is related to those real estate agreements. Although the 106 is very general, the 6E will be continuing consultation with people as we identify the places in more detail.

TKW: I guess that's where I disagree with this situation. I understand the difference like with 6e this is largely just a real estate transaction. But I can tell you from other DoD real estate-related projects I am currently working on, the position of Allan Downer⁴, is that they haven't quite figured out what that looks like. Again, I don't know how Section 106 consultation is complete or even started if you haven't sent out consultation. So, my question is, have you sent out consultation initiation letters, have you and I want to go specifically to 800.4. I think on the last call we also brought up sites that we have questions as to whether or not they will be impacted. That our historic properties that are additionally culturally significant and we

⁴ Hawaii State Historic Preservation Officer

believe eligible for the National Register. So, I have not seen a property identification report anywhere but I think that's a lot of the crux of it, that people are very concerned about properties, specifically on Molokai in this case, that are historic, and culturally significant and in my opinion are eligible and may be impacted. So, I don't believe that consultation has happened and if it has, I would like, I would just like more information on that.

CR: Our footprint when we worked with the SHPO, our footprint was actually quite small, much smaller than what was indicated in the EA for security reasons. And because of that footprint the areas that the training is proposed in was not in those areas identified as potential historic properties. We realize that the areas that is purple in the EA has numerous properties that include such things as fish ponds and other cultural areas, such as used for gathering and such, but the footprint of the actual undertaking is not within those areas.

TKW: Is there a letter? So, I think, I am trying to understand what you think your APE is. Because the map you have here has quite a large APE. So that's been changed and again I am happy to call Allan. I think you still have an obligation to consult on your APE with people who identify themselves as wanting to be consulting parties, which we did in writing after the EA came out which was a very long time ago, and I don't believe we were the only entity that did that.

CR: And we're happy to continue consultation and are listening to any concerns that you may have.

TKW: I am looking at page 3-124 and it says, one there is no map of the APE, I mean there might be I am just trying to scroll this quickly as I am talking to you. But it says it is quite a large area, that's what it implies so there is nothing here to indicate that you've indicated an APE under 106 and its different than the area studied than what you provide in the rest of the EA.

MP: I don't know, forgive me I am going to try to answer this as best as I can I am still learning and Coral is my SME and Jeff are explaining to me so this is what I understand so I may be wrong but this is – and everyone correct me so we started out with this APE this large APE because we didn't know. If we were to go with just x marks the spot, this is where we want to train it would be looked at as though what we were doing pre-decisional – we had already determined where we were going to train and we were going to drive our analysis to that. We can't do that, right, so we looked at this area and then it's hard to analyze 10 feet of wave action, you just can't do that so we say we are going to look at this whole area and analysis will show us in this area where we could possibly train. So, we did that and the 2 areas that we are interested in are Hale O Lono Harbor and Kaunakakai and those are the only 2 areas that we are interested. That after all the analysis came out, we thought oh maybe these are possible provided that we go through the consultations, provided we go through 6E, provided we get approval from the property owners, provided we get all this but were looking at this and were saying okay these are the areas – but we couldn't start off with just those areas to begin with. Additionally, a large enough area, let's say, for example, we do get approval to train in these two areas and somewhere along the line the community comes back and says, you know guys you promised us you would do this and you didn't, you did this, this, and this and we don't really want you here because you didn't live up to your agreements. Then we would go back to the purple area and see is there anywhere else the analysis would support, and again we would have to do the 6E and all the consultations required under the state process, would support training so there is a little bit of flexibility of moving back and forth between the purple lines, purple area, if there is some areas within that purple area that meet the criteria that we can train in without impacting anything, you know. So that's what I understand. So right now we are just looking at 2 areas within that whole purple, but we started out with a broad swath because we weren't sure what the analysis would show.

CR: It was important for the Navy SEALs, in addition to avoid areas that they thought could potentially be historic property and that had a lot to do with limiting their training areas.

MP: Does that help Kehau?

TKW: A little bit. A little bit. But it still sounds like that entire swath is an area of potential affect and that's why the word "potential" is in there we don't necessarily know where within the area there may be impacts so I guess I would like to see the letter where you folks identified where the APE to the SHPO and I would like to see the SHPO's concurring so I would like to see specifically those letters. And then I would really recommend pulling 106 out of this process like where we are talking about the HEPA document and

walking through a 106 consultation. So again, I don't know if 106 letters were sent out, the standard is you go to the DOI list and send out letters and we submit it through the process anyways but it really sounds like 800.4 hasn't like [INAUDIBLE]. Hale O Lono is I think register eligible, but also on top of it, it's important to have consultation so you folks can understand the importance of it for the paddlers or for divers. I guess and I mean I don't want us to take up too much time having that discussion here, but I am recommending a separate section 106 process with the Navy. And if we want to put 6E and Act 50 there as well, I think that's fine, but I think that's a separate discussion from NEPA and HEPA it sounds like.

MP: My limited understanding of this is, and I am learning as I go along, and I want to do right by everyone. I am a Hawaii gal so it's important for me that we do right by my community and the people I work for, which have quite a few people from Hawaii, we recruit heavily from Hawaii because they're water-men, they have a passion for the water, successfully recruit. My understanding is that we will, when required we will come back under the 6E process consultation that you're requesting that's my understanding.

TKW: What do you mean when required, its already required you've triggered both statutes.

MP: Right, but my understanding is that we are going to, when we start to put in the applications under the 6E process the property owner is going to direct us what to do which will include consultation.

TKW: Can we have a call with Allan Downer and Susan Lebo? I feel like there is, I am really baffled as to why you folks are resisting certain consultation under section 106. We indicate in the EA that section 106 applies, and it sounds like there is resistance to this that I am not understanding. I can go ask SHPD for the letters, I would like you folks to send me those 2 letters I requested. One, I want to see your letter to the SHPO that identifies your APE and then I would like to see the SHPO concur. And then I think we can go from there. But I'll give Allan a call after this and see if we can't set up a time to clear some of this up with the SHPO. Because I don't understand why you folks don't just, it's a simple meeting to talk about the historic properties that you guys have identified, and to see if there are additional properties that we would like to identify. I am not understanding why there is resistance to having that meeting where you've clearly triggered 106.

LB: This is Auntie Lori Buchanan, I wanted to respond to Margherita's comments. I don't think, I mean I know as a native Hawaiian my rights and privileges and my due process on the law and I don't believe what you just described is legal and correct and Trisha, and I agree 100% with Trisha. I am more of a grass roots practitioner in Maki'elana(?), but I know that you cannot start training in our harbors and then wait for the public to complain and then start a process to mitigate those concerns. That's putting the cart before the horse. You no can do this.

MP: No, no, no, I agree. What I meant was, let's say we had gone through all of the consultations and we received permissions to train in the harbors, right, I was explaining why the large purple swaths [INAUDIBLE]. Let's say we completed everything and we were all good to go and, you know, with the community support and everyone, and we were able to train in those 2 harbors. Let's say further along the line after training there for a couple of years, you discovered or we inadvertently didn't do something that we promised to do in the agreement, whatever was written into the agreement, right, for the use of the harbor. And you would come back to me and you would say hey, you know what Margherita, you guys said you weren't going to do this but you didn't, you violated this and this isn't going to work. We would then pull out from utilizing that harbor right and we would go back within the purple areas to see if there is any other palace that would work for us and for you. So, does that make sense?

LB: I hear what you're saying, I understand, it makes sense, but in our experience it doesn't work. And I am going to tell you that my community is adamantly opposed to this undertaking and this is the reason why we are on the phone with you folks today is so our comments can be heard. We've already provided comments to SHPO in opposition back to 2018, and I can prove that my community is adamantly opposed to your proposed undertaking and so this is why and I really am thankful for Trisha being a process person. I mean that's our right as native Hawaiians to have a process, and that is why we are asking and try to understand from you folks. Because let me tell you why, it is next to impossible to go back with the Department of Defense, military, any branch and reopen consultation. I have tried it with Marine Corps Base Hawaii and light-attack helicopters and Ospreys and I have not been successful for the past 6 years in

requesting to reopen for impacts. And so, it's going to be hard for me, a hard sell for me, to believe that you guys would go back and actually open a consultation. But thank you.

MP: I hear you and I hear you loud and clear. As far as I know, because I am learning this process as well, is that when I receive a right-of-entry, an agreement, written into the agreement, the property owner says they have the right to rescind that agreement with a 30-day notice at any time.

LB: Okay so DLNR, I am sorry. DLNR being the owner having the trust responsibilities for me, the actual owner, the beneficiary of the land that is being held in trust by the Department of Land and Natural Resources. Which for that case is the preservation officer that signs out on all the rights of entry is reluctant to also go back and re-open discussion. So that's how come I appreciate your saying that it's going to go back to SHPD and SHPO, because the harbor, it belongs to us, to me, it's just being held in trust and managed by the Department of Land and Natural Resources. That's why I have a right to due process. But thank you I will let somebody else jump on, thank you.

CS: Aloha, thank you Lori this is Cora Schnackenberg. I represent Ahonui Homestead Association. I totally agree with Lori Buchanan 100% and also the other woman that was speaking earlier. I would agree that a consultation through the DOI, a separate to 106, I really believe that because you are with the military you are obligated by the federal law to include the Native Hawaiian Organization. And I believe that the DOI should be a part of this process as well. For you to say oh to put this in an interim and then if by any chance you run into something that you both failed what you were obligated to do, that's not [INAUDIBLE] in itself so you invite [INAUDIBLE] at the very get go if you think you can do something and you never do your side of your obligation, you're already in violation. I totally agree and I am very passionate for our people and yes, the community is speaking out loud and clear. So mahalo, thank you next person.

CR: I am going to suggest that John send the Section 106 letter the concurrence letter and the letter initiating consultation to the team. For those who are available Tuesday afternoon I will be happy to have a Section 106 consultation and talk about historic properties with those who are available.

CS: I'll be on, thank you.

CR: And just the historic properties on Molokai at this point because if we were to talk about everything... 1400, 2 o'clock work for everybody? I will send out the invite.

CS: You know I prefer that you contact DOI to make sure that everybody is on.

CR: For this consultation it's going to be for the folks that are interested on the call that have requested consultation.

LB: I will be traveling on Tuesday October 27 and I cannot make that commitment at this time. Trisha are you still on the call?

TKW: I am Auntie.

LB: Do you have any comments on what you just heard or maybe the Navy...

TKW: I think you guys are agreeing with me so I agree with you back. But I mean I think it needs to be separate and I am unclear as to how they've met 106 and I am looking thru SHPD records at the moment and I'm going to ask SHPD directly for them too. But I think you need to be there Auntie Lori. I am hesitant to, and I agree with Cora as well, I think it should go out to, if they have not sent out section 106 consultation letters to the entire DOI list, there should be consultation initiated with the all the individuals on the DOI list.

CR: There is no requirement under Section 106 to send it out to the entire DOI list. We sent notices in our newspapers and we have fulfilled our requirements in sending out the notices. We realize that we haven't sufficiently consulted with you to find your concerns for section 106. We are going to talk to you to find out if there is any additional information that you may be able to provide but we are not reopening negotiations on Section 106 to DOI ...

...SEVERAL PEOPLE SPEAKING AT ONCE...

CR: Generally, please let me finish, does not generally adversely affect historic properties. We have a determination that there will be no adverse effect to historic properties but we do recognize that you may have additional concerns so we will be talking with you next week. Are you available Thursday afternoon at 2 o'clock next week?

TKW: A couple of things I want to unpack. I am not sure how you have a determination that there is no adverse effect because that's part 800.5 and I am saying there is still at 800.4. Second, you don't have an obligation, but as you know consulting parties can pretty much join at any time and if there's questions on that we can go to ACHP. Third, I'll defer to the people on the call as to their availability, I think they're more important than I am in the mix and I want to make sure that those NHOs, that want to join the process, have every opportunity to do so.

CR: Are people on the call available next week on Thursday?

TKW: Thursday or Tuesday?

CR: You said Tuesday people were not available. Are people available on Thursday?

LB: I am not available because I am in a 106 consultation in with Kalaupapa National Historic Park at 10 AM and in the afternoon the Hawaii Tourism Authority and so if you could do it in between those times. My 106 usually runs from 10 to 12:30, between, if it's at 1 on a Thursday, 1 o'clock I may be able to attend that on Thursday.

CR: Let's make it a 1 o'clock on Thursday.

MP: How about Cora, would you be able to attend?

CS: Yes, I will be there at 1 o'clock on the 29th of October, I am able to make that time.

MP: What about Mahina?

MPo: I should be able to make it.

MP: And Trisha, we can't do it without you, will you be able to join us?

TWK: I can make it, if it's the 29th at 1 I can make it.

LB: Punani is on the call too.

PN: I'll put it on my schedule.

MP: Thank you so much. I really appreciate everyone's kokua in making the meeting, not kokua with our proposal, just to meet with us again next week.

CS: I have one request, could you reach out to put some sort of notice out to native Hawaiian associations. I really feel that they need to know regardless of what your efforts were with the newspaper and DOI has a legit organization. It should be part of this process so letting you know the legit native Hawaiian associations with the DOI, you need to get ahold of them. Thank you.

CR: John why don't we turn the meeting back over to you so you can discuss the HEPA.

JB: Okay thank you. Well I think everybody knows what HEPA is it's the state's process for environmental documentation of projects that are proposed by the state or that use state land. So this is a joint EA under NEPA from the federal side and under HEPA from the state side and we are trying to comply with all the requirements on the state side or HEPA and provide them with our EA, and that their obligation is to determine whether it is a complete EA or that it satisfies all the requirements and they would prepare a document on the finding of no significant impact and publish that along with the Navy's FONSI, finding of no significant impact, and that would end the process. We're not at that point yet. We haven't submitted the EA to the, sorry, we haven't submitted the FONSI to the state yet, that about sums up that process. We don't know how long it will take for them to finish their review of it and back to us, we are hoping it'll be by the end of this year. Anyone else have any comments, any questions.

MPo: I have a list of questions and comments based on the minutes that you sent through but I am thinking I will draft them in an email. Is everyone okay with that instead of staying on the line for another half an hour?

JB: That's very good and yes, we request that if you have any further comments on those notes from the last meeting send them to my email address, they will become part of the record.

MPo: Will they be replied to before the final is issued or will they just be put on record?

JB: Generally, we get comments for the public for an EA and they become part of the record. I don't know how many rounds...

MPo: Maybe I can ask all my questions now, that may be better.

MP: How quickly can you get these to us? If you can get them to us quickly, perhaps we'll be able to go through them and answer them by Thursday when we meet again. Would that work? Would you be able to get them to us today or tomorrow?

MPo: I can get it to you today I just want to make sure that I get answers the same way that I would get answers if I were to talk them out right now.

MP: If you can get it to us today then we will try to answer them the best we can and have answers for you before we meet Thursday. And again, we don't need too many open unended questions.

MPo: Okay I'll do that. Just an end, a comment based on the conversation is that I think it's important for everybody on the call to remember that while we are segmenting on Molokai, the Molokai-specific parts, that this is still only a component of the larger state-wide undertaking. And as specific to Molokai we're being we should also keep in our minds the wider cumulative impact of the totality of the proposal. I think it's a frustrating part of the process and the consultation because we continuously try to fit ourselves into the boxes that you give us. It's really dislocated and piecemeal and compartmentalized in like a western concept and foreign designed way that doesn't translate or easily accommodate our unique world view, where the entirety of nature is sacred. And in return the entirety of nature we consider a cultural or historic site and what you or the processes often look for physical tangible coordinated sites, such as like the fish pond because you can see them and that's something you can grasp. For us, like the entire seascape and the ocean and the entire realm is a realm of spirituality and it's sacred and would be considered a cultural and historic site to us. I think that's where a big point of frustration comes in for me.

MP: Mahina, I want you to know I met with Auntie Kehau Lum and I've meet with Brian Keaulana and I've met with William Aila so far. And actually it was Auntie Kehau Lum that suggested that we incorporate, and I don't know, I am doing some research because I want to do this right, a moment of respect and silence before we train, go into the water. I'm working with several people to determine how I can translate that so I can put it into the training profile so if and when we do get approval to train, the guys before they step into the water, take that moment of silence and respect and gratitude and humility to be able to, before they enter the water. They do it already because many of them are from Hawaii and it is a natural thing to do for them. But we want to be able to explain the significance of this so I want to try to - anyway I am working on that and I don't know if you needed to know that but I just wanted to share with you this thing.

PN: I have a comment similar. I noticed that you have all these safety vessels, harbor masters, law enforcement, safety officers, boaters, etc. Do you have a community cultural monitor? Maybe that person might be what you're looking for, that would be uncompromised. Someone that is not with the state, someone that is not paid by the state, but also may be compensated for their time as a community person. They might be able to provide that, that moment of silence for you as well with the proper protocols.

MP: Let me see if I understand you correctly. What you're asking is while we do, before we do the training, we have someone from the community, a cultural resources person from the community be there with the person to do the, before the guys go and do their training. Is that it?

PN: Well in one of the, I read your last discussion on the 13 of August and I saw all kinds of people that will be in the water, safety vessels, in that discussion there were harbor master, local law enforcement, and I was just wondering maybe we should have a community cultural monitor on site as well. In case they not recognize or they may be compromised because of their position, that we have someone there. Could be a fisherman who knows the area who says wait, they went off, there's an area there that they shouldn't be where they are. Just to satisfy the community's concerns.

MP: I want to do right by everyone, I want to do right by my community, my Hawaiian community, I want to do right by my work community too, I am trying to do this fringe, right. If it would be possible for you, or someone who has that knowledge, to share with us within these two proposed areas I don't know if I would ever get them but Kaunakakai harbor and Hale O Lono, where this is to make sure that we avoid that. Our challenge is that the training will occur usually between 10 and 2 in the morning or 4 in the morning and maybe 2 to 4 times a year, we don't expect it to be more than that even though our EA says up to 10 at one spot, and there may be years that we don't show up at all. But our challenge is I am not to compromise the security of the operations security of the field. How do I, how do we get the training for the field, how do we get the training to proceed and without notifying all of the community. That makes it, we have a risk there that we are trying to mitigate. I hear you and want to try to incorporate what you're saying somehow and I am thinking if you could provide us information that would be great and we would

be sure to avoid the areas because that's part of their training, it would be a wonderful addition to their training scenario. It's a small group and they pride themselves on being, you know, being nimble enough to move 10 feet to the right and 15 feet to the left so we could easily incorporate that into the training scenario and it would be a benefit for them as well.

PN: Yeah, I think as part of your process you should put that out to the community. That would be much fairer. I am suggesting that someone from the community who is much more familiar than I am. Just put it out there, just like how you have everybody else who's going to be on board that you should have somebody that is qualified enough that know the area just like you have other people involved, harbor master, law enforcement. I am not looking for that job, I'm saying there should be someone that is a monitor from the community and not compromised as a state worker or on the payroll so to speak, but also compensate them too and they gotta be there. And they could also possibly also fit the - have the credentials of a cultural person that will be able to maybe initiate the process of silence or whoever. You have time from now to then to put this in the part of the concerns of the community, not necessarily me, but you know just someone from the community because if you have someone else to harbor masters, safety officers, or local law enforcement, medical officers, a monitor, cultural monitor.

JP: Thank you Punani for mentioning that. We always have cultural monitors for monitoring our projects such as the fish pond and another site that we work on out in Kaihalulu Bay and we always try to use their input for anything we are doing and I think this is a great idea, I am not sure about the compensation. Usually we just have, you know, a volunteer, we could look at that because we don't also want to make that seem like the Navy is paying for somebody to do that, that could also be looked on negatively too.

PN: Who is paying for the harbor master, or the law enforcement, or the medical officer, and the safety officer.

JP: No, I agree and you know I can't answer that question. It's not my area but I totally support having one or multiple cultural monitors giving us advice along the way and something that the Navy always does when I am working on projects. I think we could continue talking about that as the time comes but I appreciate you bringing this up though, thank you.

PN: Yep.

MPo: I have decided I would like to ask a couple questions just to get them on the record and for everyone else on the call to be able to hear them. Most of them are based on the notes that were sent. If this group that were talking to today is not authorized to make decisions or changes, then who is? And how realistic or likely is it that changes will be made based on these additional comments from us?

MP: What I understand is that if our notes are incorrect please, please for the meeting, the previous meeting, we need to correct them and we can correct them together.

MPo: It's a question based on statement that this group is not authorized to make decisions or changes to the document.

MP: These are notes, this is different, these are notes that we take and you know with notes we all hear different things or may have forgotten...

MPo: Maybe they're not based on the notes maybe they're just questions. You know I read the notes and they elicited questions, but I am going to ask them anyway on the record. Yeah, so if there is no training on the land or air does this mean that there is also no land or air support and with the mention of the harbor master and local law enforcement as well, are these not considered land support or associated land-based activities?

MP: There is no air or land training.

MPo: Support. Training lists the support side and training side are different, but there is support.

MP: Other than the phone call to the harbor master or whatever is written into the agreement as agreed to by the property owner, we, in my limited understanding because I don't know yet we haven't come to that point, typically the harbor master's staff would want to be given a notice that were coming in and working to make sure that we are not disrupting anything you know and that's usually the bulk of the support that we get. We have everything else on those two small RHIBs or 25-foot little boats that Punani mentioned. We have people there, we have our medics, we have our dive supervisor, our look out, our marine mammal

lookout, and those 2 boats, one that, we have all the support staff on there. We don't anticipate having the need for any support staff on land.

CWO EA: This is Chief Warrant Officer Alvarado, I am finally logged in. To also jump on to what you said, what miss Parent said is absolutely correct. At no time do we expect to have any physical presence on land.

MPo: Okay the electric-powered submersible with the fish finder type sonar. I recommend removing this completely. The question after that is, would removing that remove the need for the 100 to 300-foot ship?

CWO EA: So right now, I am assuming you are referring to the passive sonar system on the small submersible. It is passive reflective that of a fish finder. Is that what you're referring to?

MPo: Yeah, I am just referring to the activity of using the submersible in its entirety.

CWO EA: The submersible would move from the 300-foot vessel, move essentially outside of the water column, in this case any beach head, as it came closer it would eventually drop off the swimmers that are within the vessel. It would be typically the swimmers, or in this case divers, that would make their way in and around the pier system as to not compromise the small submersible. As mentioned earlier, that small submersible will be always accompanied with two safety craft at all times. At no point in the training, in the area of Molokai, do our divers intend to come anywhere near the beaches, but stay fully around those pier systems. Does that help explain it?

MPo: Yes, my recommendation to you was just to remove the use of the submersible in the proposal.

-----Recording ends; the remainder of the meeting is based on notes taken by the Navy participants-----

MPo: How far out does the larger vessel stay? How many miles off of Molokai?

CWO EA: Typically, it will be in the middle of the channel if not further out.

MPo: How far?

CWO EA: At the channel, around 4-5 miles.

MPo: Are you going to be training during whale season?

CWO EA: We will not be training at any point that disrupts the local community or the whales. If we can train, we first go thru the experts, marine biologists to determine when we can be there. They will tell us the season. No, we will not be training when there is whale activity.

MPo: When you do those consultations, you should include a cultural expert.

MP: Jeff Pantaleo is our cultural resources expert and will prepare a brief for the training and update as needed so we are OK with the training.

MPo: We also prefer that there be separate monitors for each place that know the area and not one person for all training areas.

MP: Yes, that is a good idea. Jeff can you speak to that?

JP: Yes, when we consult we won't just call once or twice; we will be in constant communication during training and that includes anyone on Molokai that wants to be part of the process and continued conversation with the Navy. I'll be the POC for this and you can let me know who to consult with for the various areas, that has the expertise for each area.

MP: we rely on Jeff to reach out to the proper community members and ensure that we are training in the way we said we would and we know what needs to be done before we go into an area for training.

TKW: Jeff are you considering an MOA under 106 that would include all of the commitments by the Navy that would be more binding than what we are being told on the phone call?

JP: If the result of the consultation is that we need to do an MOA, we will do that.

TKW: OK. One additional thing. You understand that there is a difference between traditional customary practices and tangible cultural resources. What will the final CIA document look like with regards to the inventory assessment given it seems like everything is activity-based.

JP: can you repeat the question.

TKW: It seems that there might not be a CIA, so how do you plan to identify all the traditional customary practices?

JP: at this point we would consult with the local cultural experts to determine if there are any TCPs or traditional cultural places within the APE.

TKW: But it's also practices not just properties.

JP: Yes.

TKW: I would recommend that this would be an important item to help the community feel better if you went through that analysis.

JP: I agree, thank you.

MPo: Further questions on the training. It was not clarified if the support vessels would be armed.

CWO EA: None of the trainees or support staff will be armed.

MPo: Will the vessels themselves be armed?

CWO EA: No, the support vessel will not be armed. It is not a typical Navy ship. It's more like a tug, a personnel transport vessel.

MPo: You state that activities would occur between sunset and sunrise. How will you be able to detect marine mammals or sea turtles at night?

CWO EA: We have the ability to detect heat signatures and we have night vision goggles.

MPo: Since your activities will be at night, what type of lighting will be used by the trainees, support vessels, and submersible? This is in reference to the potential to disorient birds and other wildlife.

CWO EA: The support vessel is well lit. The safety vessels are lit with dive lights and are reflective of what you would see on a fishing vessel. The submersible will have a white light. As trainees exit the submersible they will have a buoy about the size of a Gatorade bottle that has a chemlight that is attached to the trainee. Similar to the lightsticks that kids use during Halloween. Does that answer your question?

MPo: Yes, thank you. That is all the questions I have.

PN: I have a question. Will the law enforcement personnel be armed?

CWO EA: I can't speak to the law enforcement. You can speak to the current law enforcement and what they are allowed to carry.

PN: I just want to be clear if the training includes armed personnel or not. If there are people in the water, how will you force them to get out of the water?

MP: We would not force anyone out of the water.

PN: I just read the comments that the training would halted until fishermen leave the area.

CWO EA: We have the ability to recall our trainees at any time. Intent is to not be impactful, and if need be we will leave the area.

PN: Local law enforcement will not be needed?

CWO EA: No, we give them a courtesy notice to let them know that we will be training around Molokai.

PN: Okay.

MP: Local law enforcement will not police the area. We are just letting them know of our training activities.

CS: Based on the notes from our last meeting, I would still like to know what would happen if the Navy is not keeping their agreement with how the training is being conducted. What penalty would there be?

MP: If we are in violation of the land use permit for our training, then the owner of that property can come back and say we weren't keeping our agreement and they can pull the permit. It is important for us to follow what we said we would do in the permit. Molokai is important to us and we would not wish to violate any agreement.

CS: In our history, the military does not keep their agreements. I just wanted to put that out there.

JB: We have about 10 mins left, does anyone have any last comments?

LB: I want to get back to the Memorandum of Agreement and that the right of entry will be a contract. If there no Programmatic Agreement and only a right of entry with a land owner? If it is only SHPD can do enforcement, what is my due process regarding enforcement of an agreement. I do not understand what the agreement will be. If there is a 106 then there would be a Programmatic Agreement, then if there is an adverse effect, what recourse do I have?

MP: We haven't got there yet. We would have to bring up this comment to DLNR and see how it would be addressed. We don't know at this time.

LB: The one who has to provide the oversight of the training will have to do it on their own time and expense. And Margherita mentioned that she had consulted with William Aila, Brian Keaulana and Aunty Lum. Are you aware of nexus for decision making for Molokai?

MP: We contacted Mr. Aila and Keaulana and Aunty Lum regarding Makaha, Pearl Harbor, and not in reference to Molokai. We sought their input and advice on other areas of the action, not for Molokai.

LB: Thank you. It is important for you to understand our decision making based upon a resource realm.

JB: We thank everyone for your participation. We have a lot of work to do.

MP: We'll meet again next Thu and Coral will send out a meeting invitation.

JB: Thanks again and Aloha!

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Thursday, October 29, 2020

Time: 1300-1430 (Hawaii time)

Location: Teleconference

ATTENDEES

NAME*	ORGANIZATION*
MOLOKAI REPRESENTATIVES	
L. Buchanan (LB)	Molokai Aha Kiole
T.K. Watson (TWK), Vice President	‘Aina Momona
M. Poepoe (MPo)	Molokai resident
P. Nihipali (PN)	Molokai resident
C. Schnackenberg (CS)	Ahonui Homestead Association
K. Rawlins-Fernandez (KRF)	Vice Chair, Maui County Council
K. Opele (KO)	Molokai resident
STATE OF HAWAII	
Stephanie Hacker	State Historic Preservation Division
NAVY REPRESENTATIVES	
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
Robert Rowland (RR), Assistant Counsel	Navy Region Hawaii
C. Rasmussen (CR), Archaeologist	NAVFAC Pacific
R. Spaulding (RS), PM	ManTech International Corp.

Notes: *NAVFAC = Naval Facilities Engineering Command; PM = Project Manager.

Purpose

The purpose of the call is to follow-up with Molokai representatives and residents regarding their initial comments on the November 2018 Draft EA for NSO Training in Hawaii, and to continue the discussions that were started in our August 13 and October 22 teleconferences. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

CR: Would someone from Molokai like to provide a pule?

...long silence...

CR: If you do not want to provide a pule that's fine. I don't feel qualified to provide that pule.

CS: This is Cora, is everybody ready? Pule kakou. Heavenly Father, we thank you Lord for this day. Thank you for the many blessings, thank you for good health among all of us. Lord we ask that if we share a kanaola we ask that you be in the present. We ask that your love will help us to express ourselves out of love, Lord. We thank you Lord. May you bless our conversation and may you also keep us healthy at the end of our call. And Lord we ask all of this under Jesus Christ, amen.

...several people saying mahalo at once...

CR: Thank you for taking the time out of your day to call in. This call is being conducted because during our section 106 consultation it became aware that we did not receive, that I did not receive your letter, and I really apologize for that. We would like to talk with you about your concerns under section 106. This will be additional information that we will take into consideration as we move forward under section 106. We will do a 6E consultation after this EA is concluded and that will be done in conjunction with a real estate agreement. Since the EA is not completed yet, we are not sure exactly which locations will be finalized for training. At that point that is when we will do our 6E consultation. I'm sure you will be hearing more from us following our 106 addition here. This is really an addendum, it is not re-opening up negotiations under section 106. We are taking more into account as we move forward on our undertaking. I would like to really

quickly allow everybody to know who people are on the line from the Navy, I am Coral Rasmussen. I am the archaeologists supporting the Navy special operations EA. We also have Margherita. She is from Naval Special Operations training. We also have Robert Rowland, he's our legal counsel. And Rick Spaulding, he is our contractor. He is supporting us in every aspect of this initial EA at this point. We have actually had a few different people help us with this undertaking, a few different NEPA people. The last one you all met was John Bigay. And for our contractors we have had a few different contractors, but I am really happy that Rick is helping us. He is really excellent. We all talked a little bit at the last meeting and so I want to make sure that we are here to answer any questions that you might have. In regards to this undertaking, and I know that we talked about it briefly last time we were on the call, but I am wondering if anybody has any additional questions that they would like to ask.

TKW: Why are you not reopening 106?

CR: Section 106 allows us to consider additional information as we move forward. We are finalizing the EA at this time and we will take into account any additional information that you may have.

TKW: so my concern there is you said you didn't receive our letter but 'Aina Momona was specifically named in documents you sent to the SHPO as part of your consultation. So how are you saying you didn't receive our letter if we are listed as one of the parties you consulted with? And that's not true you didn't consult with us.

CR: I personally did not receive and email or your letter and I am so sorry about that and we are talking to you now.

TKW: OK but that doesn't answer my question, in the documents you sent to the SHPO as part of your section 106 consultation with the SHPO, a specific question was asked about consultation with different parties. I am looking at the letter, the 2019 letter, and it names our organization. But we were not consulted with so I think there are errors.

CR: But we are consulting with you now and I am so sorry about the oversight. I would really like this to be a very meaningful consultation and I would like to move forward on things for section 106 so that this can be meaningful. I really do apologize very sincerely that there seems to have been an oversight and that's why we are talking with you right now.

MPo: You know we've sat on two of these calls for hours and going around in circles about what is going on with 106, and none of the people on your end who have knowledge of this stepped up and just said it's completed. That would've been really helpful from the get-go. Instead I feel like we wasted a lot of time trying to figure this out when you very well knew it was completed and at least had it been stated earlier we could've move forward from that point. But I hope you can understand why we're having our frustration where we are right now.

MP: I truly understand and I share that frustration as well as we move forward through this process. We've had different parts of the Navy involved with the 106 and when we went through all our documentation we didn't feel comfortable that we had addressed your concerns so that's why we came back to you. We had been assured that everything had been done, you had been consulted and it appears to have been truly an oversight. We have changed several project managers as well in this. I have been involved from day one but I relay on my subject matter experts to guide me and this is where we're at. I share your frustration and concern and that's why we've come back to you and we humbly say forgive us for the oversight and hopefully we can move forward. If you take a look at the APE, we listened to your, based on your last conversation Trisha you were asking why we had such a large APE. We reduced it considerably. We said, look now that the analysis has shown that it possibly can be done, we're not 100% sure, but we think it can be done, these are the two smaller areas that we are interested in and we are hoping that we can get some data from you today to make sure that we have the information to move forward.

TKW: I have a question there then. So, your APE according to the 106 process that you folks have flubbed and are announcing you will not reopen. This APE is 50,000 acres. So if you're changing your APE, that requires you going back to the SHPO. I don't want to spend 3 hours going in the same circles we've gone over and over again if you folks do not have a real understanding of the process under 106. The letters say the APE is confirmed at 50,000 acres.

MP: Coral, can you answer that for us please? Thank you.

CR: I hate to say this, can you repeat that, you cut off when you were talking, I couldn't hear what you said.

TKW: Sure, so in your completion of 106, one of the questions that the SHPO asked was the mileage of the area of your APE which came up on the last call. So, I asked for the letter and the concurrence from the SHPO about the APE and it wasn't sent to me but I got it from SHPD. The APE that you have identified to the State Historic Preservation Officer is 50,000 acres. If you are now saying you are changing it, that requires going back to the SHPO. Unless I am wrong, I don't know. I think Stephanie is on the call she may be able to.

CR: Right, we talked to legal counsel and since we were reducing the size there will be less of an effect. This will be an addendum we should not have to re-open the section 106 consultation. But we are happy to assist you and we are also happy to put the APE back if that makes it better and everyone happier for everybody. But we are trying to take into account your comments from the last call and since this was a large area and although we had explained to you that our training was not going to occur in areas in between the two proposed locations for training, you wanted assurance that we were not going to train in that area. So, following your suggestion and taking into consideration all of your comments, we have tried to reduce that training area APE. The training location itself is not changing and we were not comfortable providing too much information. But we have gone back with Margherita's input we have shown a much smaller area so that we can work with you, and consult with you in good faith on the area that we are proposing the training.

TKW: I want to be clear, if this is good faith then section 106. I'm wondering if that's just instead of wasting another hour, if we can bring the ACHP into the conversation.

CR: Please invite ACHP if you would like. We work very closely with Kate Kerr and she, you know, we're very happy to have her involved. However, in this case we do fully recognize the comments and suggestions that you have provided and we are trying to take those into account while moving forward in that manner.

TKW: Okay, do you have issues about identification of properties. In the letters that you were sending to the SHPO that weren't being shared with the rest of us, you have 104 pages of historic sites that were identified that were never provided to the consulting parties. So, again we have asked for this information. I am wondering at what point you're going to start providing – you are talking about wanting to consult with us in good faith but you haven't given us information.

CR: It was our belief that these letters have been sent out to everybody and once again I am really sorry that the letters may not have been received by you. It's a large process and a number of people assist with this and I do really apologize. We do really want to work with you and we have been listening to you. And we have, we are avoiding the fish ponds, we are not training right along the coast, we are not coming over the beach. We recognize that there is a lot of sensitive areas right along the coast and really our training is within those harbors and wharfs like Margherita indicated last time. We're not building anything, we're not cutting anything down. And the training activities should be barely visible – if they are, then they're not doing their training correctly. And they're just hoping to work in areas that have been modified recently in the Harbor and the Warf by Molokai.

PN: I'm trying to get a better perspective, cultural perspective, with you folks that had done research on in order to get to the point that felt you had completed your process. So I have someone here who wants to share some [unclear] as well let me introduce himself because it kind of conflicts with what you're saying about cultural sites that may be there.

CR: Thank you.

KO: Aloha, my ancestor name in reality is Kahua Opele That is my ancestral name [unclear].

CR: Hi, are you still there? Did I lose everybody?

SH: This is Stephanie, I am still on.

PN: Are we there, can you hear me.

CR: I think, I can hear you now, you were just telling us your ancestral name.

KO: I am a lineal descendent of Molokai. I come from the high chief [unclear], he was the high chief of Molokai. I am a lineal descendent, I am a cultural practitioner on Molokai. When you guys talk about the ocean, we have religious sites that we call koa where the fish go. And the hanau and the ocean we have shallow water koa, religious sites in shallow water. We have big water. I have to learn 5 years of the deep

water sites koas in the deep water. [unclear] All of that is connected to the land because on the land sister, there's koa sites too. And when you guys make [unclear] military activities, we have you guys, the Americans, we put in law to save the turtles. We have turtle sites up there. We have [unclear] the fish you guys want [unclear] it's all connected sister.

I don't know if you guys believe me but I was born. My mama [unclear]. A traditional Hawaiian baby way. My grandpa and my great grandpa they grab me when I was born. My mama would tell me, my real mom from 12 years old, I was calling my biological momma sister. So, I was raised traditional sisters, traditionally. My life is all about my culture and now you want to come inside Molokai [unclear] and we live off the sea for generations. So my name today is [unclear], that's my name. Again, I was born and raised here [unclear] 26 generations. So, nobody can tell me who I am and where I'm from because I was born Hawaii and learning my culture. So, I feel offended now because you guys come into my aina, to my kingdom, without permission. You guys making all decisions without permission. The place is all [unclear] again. That's why they're not building the military, that's why they're not building on the south side, because the land is alive and that's for real.

Maybe you guys think I'm crazy but you know [unclear] what Punani told me, [unclear] they got to hear this. We get koas in the ocean, military miss military. That I can't tell you guys where [unclear]. My family never give you permission to expose religious sites. Where my family when we hungry, we know where to get the food. So you guys got understand when you guys will come in no matter what harbors. I know there's four harbors and they're natural harbors and every harbor and every fish pond [unclear], why every fish pond, every natural hatchery places have koa, religious sites. So if you guys fish and we fish too in our own culture. We pray for our fish, we pray for our food. Bottom line. I hate to talk like this to anybody but I think this is very important for the future of Molokai. This whole island is [unclear]. You guys do not know the history. You guys do not know the pride. You guys don't know nothing about us indigenous people. Nothing [unclear]. I'm sorry I'm not trying to offend you guys but leave us alone. Go someplace else. The picture of military I see is #1 Kahoolawe. We still get bombs in the water, we still get bombs on the land. And Molokai. There was bombing on [unclear] on Molokai too when I was a young boy. So you guys history with military are not too good. I was jailed because the Marines [unclear] military combat play Army [unclear] me and family and my friends and my cousins, we go up there and clean the fox holes with all the [unclear]. They arrest me for that. They thought I was stealing high velocity ammunition so when we go into the evidence room [unclear] I told him I am taking care of the [unclear] that the military left behind. So you know miss military, you guys are bad news on Molokai, period. So you guys [unclear]. Stay away from this island, period.

PN: From a cultural perspective from what you got from your cultural person or the Bishop museum, state lacks this information. That's the summary of what [unclear] is trying to say here. He cannot tell you all of these things because he's not authorized [unclear] - he can mention it now just so you understand the wahi pana there. Deep water and shallow and the fish ponds. I don't see how you can conclude your 106 without this kind of information being entered into it. You got to get this cultural perspective in there and how you are going to get around it I'm not sure.

TKW: I want to support what both those kupuna just said. They just identified historic sites that are eligible under the register. These are physical sites, they can be bound. Again I have questions on the 800.4 of 106 in the preliminary identification of sites that might be eligible under the register. I think you folks need to go back and the full identification of the [unclear] in that area and then do determinations of eligibility which have not yet been done for that area.

CR: We have done quite a bit of research and the next step is to reach out with you and we really would appreciate you looking at the revised locations and talking with us. We recognize that there's a lot more in your sacredness of Molokai than just the fish ponds and other areas identified in archaeological reports. Areas that are secret and sacred and we respect that but section 106, yes?

PN: Go ahead, we are here, listening.

MP: First of all I want to thank you so much for sharing that. I think it's very important that we hear that information. I don't know if you're aware of the types of training that we are proposing. Again it's just if we get permission and if everything goes well it would be for the two harbors: Hale O Lono and Kaunakakai

harbors. And it's just basically swimming. It would be guys swimming in the water in the harbors maybe 2 to 4 times per year if at all that, depending on the training profile and the skill set that they're looking to do. So, we are not looking to do anything other than swim into your harbors. Those two possible harbors, so I am not sure if you were aware of that so I thought I would share that with you.

MPo: It's not just swimming, there's also the component of the submersible.

KO: Oh no, sister, sister military. Kaunakakai Harbor we had one out there [unclear] we have a koa outside the Harbor, Kaunakakai Harbor. And in the old days Kamehameha [unclear] was living there. So we have heavy history of our [unclear]. And Hale O Lono Harbor, we have one shrine there too [unclear]. Sister I can tell you guys this because some of my people know what I'm talking about. Outside Hale O Lono and outside Kaunakakai Harbor and all the in between there you say the fish ponds blah blah blah, is all sacred, the fishponds, the mana. The fishponds have their own story and their own powers sister military, you know?

MP: I hear you, now don't call me military. I am a local girl too. I just happen to be working...

KO: Oh you're a local girl, sister? If you are local girl then you understand where I'm coming from.

MP: I do, I do.

KO: You're working for the desecration game and you don't understand where I am coming from, is from Hawaii.

MP: I do not want to desecrate anything.

KO: I don't go to your island sister and I [unclear]. I respect your island. My people are not over there, my people are buried over here. That's why I get very [unclear] with you guys.

MP: Coral, please explain to me are we proposing to train over any fish ponds? I thought we were not.

CR: We are not, we have avoided all the fish ponds we worked really hard to avoid the fish ponds and other areas that have been identified in all the reports and we understand that there are other sacred areas that may be located, and sometimes sacred and secret locations. We just want to work with you really closely. Locations in and out of the Harbor where the boats regularly go is where the training is proposed, not areas where the boats do not go. And the little submersible does not go into the Little Harbor.

KO: Oh sister, what's your name what's your name again local girl?

CR: My name, oh that was Margherita that you were talking to. She is local.

KO: Where are the harbors you guys don't say anything about the harbors and bringing in the submersible. You guys don't look and see the picture, You guys cannot see the cycle of life, of man and the ocean. We're all together, synchronized together. You guys will come in the harbor. We have seasonal, seasonal [unclear]. I can go on and on and you know what [unclear] they going to hang me, they going to cut my [expletive].

TKW: So this is my next question. Why not take Molokai off the table?

KO: That's what I'm trying to say. Leave us along. Beat it.

TKW: I agree, I mean you have 6, 5 other islands you're going to train on that we do not have this issue.

KO: [unclear] military base, hundreds and thousands buried down there and [unclear]. Forgive me, forgive me.

TKW: This is the most highly concentrated subsistence fish pond, fisheries, probably in the entire state. I cannot understand why you can't take this part off the project entirely. I mean obviously it's going to be a fight the entire way. I can't imagine at some point still the strategic road showed up.

PN: We can go onto your sacred site, maybe Punchbowl or Arlington, and go practice our culture over there. It's the same thing, but maybe you guys cannot get what we're saying. Same thing. Wahi pana over there, wahi pana over here. [unclear] Your research is not going to show [unclear].

CR: So as you all understand we are consulting under section 106 at this point but we do plan to consult under 6E at a later time. Section 106 is really focused on the historic property identification. We look really closely at areas of concern. It's going to be a two-step process for this EA because it's a HEPA/NEPA document, it is not just a federal document. So at this time we are listening to you.

TKW: So again, you can't even give us a clear answer on where the APE is, you say it smaller the document say it's the entire area so that's 800.3. 800.4 – you have now had kupuna identify that there are numerous sites that qualify as historic properties under 106 that you have not identified and you've not evaluated.

CR: But you have just identified that these historic properties are sacred and secret, unless you know where they are. That's another step. If you're not willing to share the location with us you just identified that they are secret. We do want to work with you we are listening to you...

PN: But your process is secret too. This whole thing is secret. The SEALs are secret, their operations as you said on August 13 notes, we're not even going to know that they're there so how do we know that they have been there over these areas if it's a secret there too? So how come our secret has got to be exposed and yours does not?

CR: I'm not saying your secrets have to be exposed. But we cannot address them as historic properties if we do not know where they are we want to acknowledge that you have these...

...PN and CR talking over each other...

PN: He said he cannot divulge. You have to assume that the historical information that has been presented, the cultural perspective, is there. And if it's there then you got to accept it.

CR: We do accept that it's there. However, because it is sacred and it is secret it's hard for us to address and in the process right now....

TKW: I'm just gonna stop you, it's on websites that the federal government has issued policies on this. It is far out untrue that there are not mechanisms in place to deal with sensitive information by the Hawaiian native people. Now you're really getting on my nerves. Either you know [unclear]. It's done all the time. You don't get to tell us to ignore historic sites because we don't know how to deal with identifying them. That is your obligation as the federal agency. Honestly like this is, I'm super pissed now. I'm saying if we're just gonna fight it out, we're just gonna fight it out. And I'll tell you this is not where I started. I got asked to come into this and I've never seen a 106 handled so badly, and I do this for a living.

CR: I know you have not enjoyed talking to me and I really appreciate that you are talking to me now and we would really like to move forward on this.

MPo: We've heard this and you keep saying the same things. You know it's getting frustrating and we keep talking around in circles. Just to speak to uncle's point requiring that this closure, exact coordinates of a cultural site that is supposed to be secret is in itself a violation of cultural traditions. I want to just concur really quick with taking Molokai completely off the table. And I want you to take this back to whoever does make the decision and describe to them all the procedural issues that we have brought up and make a decision as to whether or not you are going to move forward with Molokai, and if you do then I guess we are ready to fight it out and drag it out as long as it takes to protect what we have to protect.

MP: I have a little question - please have patience with me. I hear what your concerns are and I am curious. My question is: these two harbors, especially Kaunakakai is a public harbor. We are looking to use the same access that the public uses to get into the harbor...

KO: You are not the public. this is really bad sister [unclear] you are not from Hawaii hello you shame on your ancestors girl.

MP: I am also Native American.

...KO and MP talking over each other...

MP: And I have a Hawaiian ancestor too.

KO: Yeah, will you better check with him.

MP: Anyway, again bear with me I am learning so much so thank you for sharing. [unclear] With this Kaunakakai with people accessing the main harbor, the public accessing that harbor, are they also going over your sacred sites as they go in and out of that harbor?

KO: [unclear] Yes, there's koa. Margherita, the koa right outside the harbor my people know where to stay to I guess. I'm a fisherman. I'm not a farmer. I'm a fisherman bottom line [unclear] so that Harbor [unclear] right outside the harbor mouth, come on sister talk to your ancestor.

PN: I guess because of the fact that we have a very contentious history. The fact that the state and the DLNR don't really represent our interests and this is why we have this situation today. So if you try to imply that oh these other guys are going all over [unclear] so then why can't we, then let's put an end to that thinking.

MP: I'm not trying to imply I'm trying to understand the process that's all.

PN: We are trying to understand the process as well. But because the process has been usurped, because of the historical injustices. We can go back to how Hawaii became part of America [unclear] and the people,

that supposedly our trustees, are not honoring their trust to their beneficiaries. This is a beneficiary, deeded land in between the two harbors [unclear], but everything in between is wahi pana. That's what we saying is that you folks violated our sacred wahi pana. It's difficult because these state agencies say they represent us but they do not speak to the beneficiary so you assume that it is OK because they gave you permission. They supposedly are the property owners. We the property owners as the kamaaina.

MP: Thank you so much, I think I am understanding you better. So what you're telling me, if I'm understanding correctly, is that whoever is the provides the permitting for the two harbors is doing it erroneously because there are wahi pana when going in and out of the harbor. So in other words you cannot access the harbor without going over your sacred sites, is that correct?

PN: So they're not listening to that perspective, not even our own state trustees who represent the beneficiaries, is what I am saying. They are usurping our native cultural rights. They are usurping our perspective of [unclear] injustices. Just because it is a sacred site and has not been identified in your western concept that don't make it not sacred that's what the word [unclear] means. You guys have laws to protect our rights as natives because that's the same thing we went through with our [unclear].

LB: Pardon me Punani, you started down this track insinuating that we are probably singling you out in a commercial used space and trying to compare apples and oranges by wanting to tell you on the record that we have a long historical history of engaging with several entities that propose projects at the Kaunakakai pier. We came out in full force to oppose ships landing on the pier, the installation of 26 inch pipeline, the installation of the MARSEC, [unclear] was instrumental in writing up protocols with the Department of Land and Natural Resources. I have engaged personally with Verizon and other entities wishing to build projects on the Kaunakakai pier. we have engaged in multiple years of discussion with the Department of Land and Natural Resources with the use of the channel and the Kaunakakai pier for multiple canoe races during the year and the impacts thereof. So, this is totally not singling out the Navy special ops. You are but another person wanting to abuse our resources and we are responding to that, that we do have concerns that is going to be, have adverse impacts. And I wanted to address Coral at this point too. Can I get into the discussion of whether or not we are going to pinpoint because on the record today you have already heard Mr. [unclear] state for the record that there is koa adjacent right outside of the harbor and within the harbors is already a statement on the record. And I wanted to speak to others on this call. I understand that Robert is your lawyer, Robert Rowland is your lawyer and he's listening to all of this. I agree with Trisha Watson and whatever you wanna call talk-story session. You're not in 6E, you want to put a 106 on it but it's closed. We don't know what the hell it is. I think that Trisha you have to take Molokai off of your proposed area and I've heard now three talk story sessions with the person in charge of the actual Navy SEALs operation. I am well aware of how that is going to happen. You have heard that we are totally opposed to this. Our Congress people in fact know that we are opposed to this and we will make it very clear to the department and the SHPO that we are opposed to this. And so if the Navy still wants to go there. I hope at some point I want Trisha on our behalf to wrap it up and what we propose to do if you guys want to go there. If you guys can talk story with Robert and Rick, whoever you guys got to talk to you. Now more so I'm adamantly opposed because of the pushback and your inability to be culturally sensitive which is disingenuous on this call and I am aghast and I am offended. Thank you very much.

KO: Right on.

MP: First of all, thank you for sharing. I don't believe that you're singling out us. Having watched the history of Hawaii and knowing what's going on for the last 30, 40 years I have a smidgen of understanding that this is just part of the – we're lumped in with all the other trainees. For me it's difficult because I have Hawaii boys on our team that are training in Hawaii, they're watermen and we recruit successfully from Hawaii because of the aptitude of our guys here in Hawaii and respect for the water. We do have with some of the consultations, that we've had a request to do a pule and a moment of aha, if it's called correctly. And we're going to incorporate that into our training profile. Again, we're not looking to build anything, we're not looking to leave a mark, we're looking to just swim. And what attracts us to Molokai is the fact that they're small harbors and they're not well lit. So for our people, our guys who are unfamiliar with Molokai, the challenge is to be able to find the puka, if you will, as they're coming in from the ocean to find a puka to get into the harbor and that's what attracted us to Molokai. So, I just, thank you for sharing. And I am

sorry that you think I'm disrespectful. I have tried my hardest to coordinate with everyone because in Hawaii I believe we are all connected. What I do on this island can affect you on your island, what you do on your island can affect me here. So I'm trying my best to reach out to everyone the best I know how to make sure that I listen and that I hear and then I go back to everyone and make sure that we've done everything the way that we need to do it. So bear with me and I thank you for taking the time to share with us your cultural perspective of Molokai. I've been to Molokai several times. I've had incredible experiences, mystical experiences on Molokai and I will never forget them. I was brought there by cultural practitioners and it is just absolutely fascinating, and they did chicken skin experiences from Molokai. So I hear you loud and clear and I thank you for sharing and I respectfully thank you. I'm not here to belittle the practices or anything that you shared. So if you feel that I have done that, that is incorrect. I am listening to you loud and clear. I am just trying to understand the process that I am working within. So we're going to note all that information that you gave us. We want you to realize that again the training is only water-based training and that we are only looking, we reduced the APE. Trisha because you have rightfully said hey you've got this whole big area, we've got a lot going on in this area. So we took a look and said, well geez let's reduce it, and we've done that. So I don't know what else to say at this point. Coral do you have anything else to add to this?

CS: I am going to interject. This is Cora Schnackenberg. I represent the Ahonui Homestead Association. You know it's not about chicken skin. It's not about education. This is a lifestyle. Our people of Molokai, this is a lifestyle, this is not a fad, it's not tourism. We are talking about [unclear] ancestral background. And part of informing you, part of, its sacred you need to understand. And I agree with Lori Buchanan that you are not sensitive to our culture. You're not. It's not just you, but the whole military. Because its only swimming, that you're going to cut short your folks permit to mess up with the EA. It's [unclear], it's not even pono. So you guys, I am for taking this thing off the table because you're definitely not hearing us. That is my position. I am totally with everybody that is opposing this whole request and permit. Mahalo.

MPo: I just have to comment on the moment of silence that you're going to be writing into your plan and it also just speaks to the differences between cultural practices and what is acceptable and not in different areas among different communities of Hawaiian people. Because that might fly in other communities and be enough for them to accept your training, but to me that was actually offensive to hear. It just means to me that we're going to take this moment of silence before we desecrate your cultural spiritual grounds. So yeah just to think about. Even if you're hearing it from other people like practitioners around the state, it doesn't necessarily mean that it applies or is going to be well received by everyone else.

TKW: I want to echo what Mahina just said. Just because someone [unclear] absolutely does not mean that that would work for everywhere. This has been discussed written about, studies have been done on it, about how you can't apply what may work for one community in Hawaii to another. So I agree with Mahina. I am also like so offended and I so rarely get totally offended these days. I'm shocked. I just really am. I've spent hours and hours and I don't feel like...One, I am very frustrated because we wrote a letter. We followed the process to a T. We submitted within the deadline of the EA. We said all the things we needed to say on 106 and it was still completely ignored. And even now the request reopened, acknowledging that people made a mistake, is being disregarded. So I don't know how you folks could straight-faced say let's go through the process [unclear], when for 2 years you have followed the process with complete disregard of any native Hawaiian organizations or family efforts to properly follow the western process. so I think that's outrageous. We did everything right. You folks screwed up and yet the community is still being penalized. So I'm not comfortable with let's just keep going forward. We've recognized we screwed up. That doesn't matter. We're just gonna sweep this under the rug. I think that's fully unacceptable. My position dead firm take Molokai out. Period. So that's what's coming. It's gonna be a fight. I think these meetings are a waste of time at this point.

MPo: We can't just keep going around in circles.

TKW: Sorry say that again.

MPo: No, I mean it doesn't seem like we're getting any new information from the Navy side.

LB: I agree with, this is Lori, I agree with the statement from Trisha.

MPo: Yeah me too.

TKW: And I want to be clear, I think all of us who have been now on three calls for hours and hours really came to the table [unclear]. That's why we wrote the letter. That's why we followed up. It's why we been here and I feel like you guys just have been so, on the government side, the federal government side, have just been so tone deaf and insincere at our request, that I think you blew it in these meetings. So this is not we came in absolutely opposed, you folks got us there. I want to be really clear and have that be on the record.

CR: So thank you so much for talking with us. We do appreciate you sharing your reasons and ...

SH: I just want to say that, as far as the APE goes with it being a reduction in size. I don't see that making much difference in the decision making and the final determination. I cannot speak for the SHPO but I, I don't think this is something that would be a large concern. But where I'm concerned from the regulatory perspective, in my opinion, what's going on today and I guess you guys have had two prior meetings, is section 106 consultation. So in my opinion, I do think that it's hard to argue that section 106 hasn't been reopened. And just to go further on that, I think that one of the major objectives of 106 is to take into account information and concerns raised by the consulting parties and native Hawaiian organizations to afford the opportunity to minimize, mitigate, and avoid impacts to historic properties. In order to conduct a reasonable and in good faith consultation effort, you know in my opinion it requires allowing the consulting parties opportunity under section 106 to provide comment and the opportunity to make changes to the final scope. Now I hear you Margherita and the Navy that what you're proposing is swimming, may or may not have a big impact on historic properties should they be present. But I still think that as far as process goes, I think that the Navy recognizes that this is consultation that you do you know, if nothing else, to just give folks a platform to consult and to provide them the opportunities to make changes to the section 106 because it's not their fault that their letter was overlooked or not received before. And so again I think this is consultation now. It may not be going in a great direction on either side, but I do think it's important just to know procedurally from a regulatory standpoint, also as far as 800.11 is concerned, there is a responsibility for the Navy to provide to the SHPO copies or summaries thereof, of the consultation effort and so I would ask that this is looked at as either a real reopening or reinitiation and that our office receive record of the consultation that's going on right now. And that's all I've got for that. Thank you.

CR: Thank you Stephanie. Is there anybody else that would like to say anything before we close the meeting?

KRF: Aloha, this is Councilmember Keani Rawlings-Fernandez with the Maui County Council. I would like to make sure that this is on the record that our county council passed a resolution unanimously opposing any military activity in the county near shore waters. You have that in your records.

MP: We are aware of that, thank you.

KRF: I want to make it very clear that who you're hearing from is not just a few disgruntled community members. They are representing the larger community and as a representative of our county, I am also representing the larger community in opposing military training in our harbor.

KO: Keani, your grandpa August, you have his mana.

KRF: Mahalo uncle.

KO: They were my teachers too.

CR: I'd like to thank everybody for joining on the call. We are listening and so the next step is we will write up our notes and we will give those out to you. And we will provide all the meeting notes to Stephanie as well as the Historic Preservation Officer

MPo: Can I request the recording?

RS: Was that Mahina requesting the recording?

MPo: Yes please.

RS: Yes, I will do that.

MPo: Thank you.

TKW: I'd like to request that Keani be copied on all the correspondence to the SHPO so she can disseminate it to the local community. Sorry Keani not to volunteer you, I think it is important.

MP: this is Margarita, do we have your contact information.

KRF: I will put my email in the text.

MP: Thank you.

CR: OK, thank you everybody and I hope you all have a good day.

PN: Mahalo. Aloha.

MP: Aloha, and thank you for sharing.

C.8 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter: Maui Petition

A total of 23 individuals submitted a petition that opposes the Proposed Action and how it could impact the Island of Maui. The following is the Navy's response letter to Foster Wick, the organizer of the petition. A copy of the original petition follows the Navy's response letter.



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 6, 2021

Foster Wick
200 Hina Avenue, Apt. M4
Kahului, HI 96732

Dear Foster Wick:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Your petition has been received and is included in Appendix C (Public Comments and Responses) of the Final EA. Your concern is duly noted. Please note that the increased training requirement is in accordance with the Naval Special Warfare Command meeting its Title 10 U.S. Code Section 167 mandate as discussed in Section 1.3 (Purpose of and Need for the Proposed Action) in the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R
.1229438936

Digitally signed by
ENG.SHERRI.R.12294389
36
Date: 2021.04.06
15:03:07 -10'00'

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: Petition with 23 signatures from Maui residents.

Copy to: Hawaii Department of Land and Natural Resources

Petition - ATTENTION:

U.S. Navy Military Training that includes Active Ammunitions is planned for Land, Water and Air for Maui County (Maui, Moloka'i and Lāna'i Islands).

The Deadline for Public Comment to Naval Special Operation Training is set for Jan. 7th. Please sign the Petition below to Protest.

We the undersigned say NO to Military Warfare Training on Maui County Islands and Waters.

- | NAME | ADDRESS | PHONE | EMAIL | DATE |
|---------------------|--|-------------------|-------|----------|
| 1. FOSTER WICK | 200 HINA AVE Apt M4 | 8083577128 | | 12/31/18 |
| 2. Kristin Gillette | 200 HINA AVE MB | (808)2488444 | | 12/30/18 |
| 3. Elaine Gima | 200 HINA AV-H6 | (808)283-0174 | | 1/1/19 |
| 4. DAN EASTBURN | 200 HINA AV, H5 | (87377105) | | 1/1/19 |
| 5. MARYBETH JOHNSON | 200 HINA AV G5 | 2980560 | | |
| 6. Joy REID | 10 ^{NORTH} HIENA PL, KUKULANI | 96767
573-8384 | | |
| 7. Paul E Murphy | 582 Hoene ST. Makawao | | | |
| 8. DORLI REEVE | HCI Box 168 | 96768 | | |
| 9. LENEVA TIEDEMAN | 200 HINA AVE #P3 KAHULUI | 96793 | | |
| 10. MELINDA CLARKE | 200 HINA AVE., KAHULUI, | 96732 | | 1/4/19 |

By January 5, 2019 email this page to <NFPAC-Receive@navy.mil> or return to Melinda Clarke for mailing in by January 6, 2019 Mahalo

ENCLOSURE

Petition - ATTENTION:

U.S. Navy Military Training that includes Active Ammunitions is planned for Land, Water and Air for Maui County (Maui, Moloka'i and Lāna'i Islands).

The Deadline for Public Comment to Naval Special Operation Training is set for Jan. 7th. Please sign the Petition below to Protest.

We the undersigned say NO to Military Warfare Training on Maui County Islands and Waters.

NAME	ADDRESS	PHONE	EMAIL	DATE
1. Renette Koa	107 Koehana Pl. Makawao HI 96768	808-633-5105	Armanet42@gmail.com	01-01-19
2. Mary Medeiros	1080 Mahanani Pl. Makawao HI 96768	808-250-1575	wylie15@yahoo.com	01-01-19
3. KEIVENE KOA	3125 Iolani St. Makawao HI 96768	808-280-2065	ELIJAHKOZI@gmail.com	01-01-19
4. Kourtney Uwexoolani	386A Mokuhihi St. Makawao HI, 96768	808-276-5726	Koak020989@gmail.com	01-01-19
5. Michael Teves	1045-D Ukiu Pl. MAKAWAO HI 96768	808-344-3688	tevesbay2@yahoo.com	1/1/19
6. Melanie Clubb	1045-D Ukiu Rd. Mak.	808463-1543	malu6294@yahoo.com	
7. Kelsey Koa	107 Koehana Pl. Makawao, HI 96768	(808) 979-5995	Pukawai25@gmail.com	01-01-19
8. Jules Castillo	876 Hemala St Mak HI	96768		1/1/2019
9. Darren Medeiros	1080 Mahanani pl	572-0047		01-01-2019
10. Anthony R. Medeiros	1080 Mahanani Pl.	2509460		1/1/19

By January 7, 2019 email this page to <NFPAC-Receive@navy.mil> or return to Melinda Clarke for mailing in by January 6, 2019 Maialo

Petition - ATTENTION:

U.S. Navy Military Training that includes Active Ammunitions is planned for Land, Water and Air for Maui County (Maui, Moloka'i and Lāna'i Islands).

The Deadline for Public Comment to Naval Special Operation Training is set for Jan. 7th. Please sign the Petition below to Protest.

We the undersigned say NO to Military Warfare Training on Maui County Islands and Waters.

NAME	ADDRESS	PHONE	EMAIL	DATE
1. Laakea Dettart				1/4/19
2. Cheryl Bargabos	646 Kipapa Pl.	205-0546	cherylbargabos@gmail.com	1/4/19
3. Renee Eiley	3432 Kaha Dr. Kihei	298-2045		1/4/19
4.				
5.				
6.				
7.				
8.				
9.				
10.				

By January 7, 2019 email this page to <NFPAC-Receive@navy.mil> or return to Melinda Clarke for mailing in by January 6, 2019 Mahalo

C.9 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letter: Maui Form Letter

A total of 32 individuals submitted a copy of the following form letter that opposes the Proposed Action and how it could impact the Island of Maui. The Navy's response letter to Mary Dungans, organizer of the form letter, follows the form letter.

From: Mary Dungans <mary@red-jeep.com>
Sent: Wednesday, January 2, 2019 3:37 PM
To: NFPAC-Receive
Cc: ja@malu-aina.org; Sarah_Levy@fws.gov; Jason_Holm@fws.gov; Miel_Corbett@fws.gov; Brent_Lawrence@fws.gov; Rylan_Suehisa@fws.gov; Jane_Chorazy@fws.gov; contact@mauisierraclub.org; hawaii.chapter@sierraclub.org; hawaiioffice@hirono.senate.gov; casework@schatz.senate.gov; TulsiOffice@mail.house.gov; opinions@themauinews.com; mtanji@mauinews.com; editor@mauiow.com; wendy@mauiow.com; Editor@hawaiiexpress.com; Kimokeo Kapahulehua; kehaulani1976@gmail.com; info@maui-tomorrow.org; robyn.walters@noaa.gov; info@pacificwhale.org; admin@pacificwhale.org
Subject: [Non-DoD Source] Opposition to the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui
Attachments: letters 2.pdf - Adobe Acrobat Professional.pdf

To: Naval Facilities Engineering Command Pacific, Attention: Project Manager

I am a Maui resident and love this Island and its waters. I have many friends who feel the same and I have attached 32 letters opposing your plans to expand active warfare practice in Ma'alaea Bay on South Maui. The most recent census shows the population of South Maui is over 26,000, the 12th most populated region in the state of Hawaii, not counting part time or visitor populations. Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Centers, Canoe Clubs, private canoes, SUP's, divers, snorkelers and swimmers using our beaches and waters every day.

Ma'alaea Bay offers the longest uninterrupted white sand beach in our whole state. Ma'alaea Bay is where endangered turtles nest, endangered monk seals rest and sun themselves, and the endangered humpback whales give birth annually. Plus our ocean reefs are rapidly dying and the beautiful tropical fish are almost gone making Ma'alaea Bay a highly environmentally sensitive area.

Your abstract states that the Department of the Navy wrote this EA alone, with no cooperating outside agencies involved. Then as I read the EA you say you are working with the EPA, Dept of Land and Natural Resources, Dept of Fish and Wildlife, Native Hawaiian organizations, etc. If they have been consulted, where are their findings? Why weren't they included in this EA? Is the Sierra Club, Maui Tomorrow, Humpback Whale Sanctuary and Pacific Whale Foundation ok with a plan that could environmentally impact three endangered species? Is the Hawaiian Community really ok with this military plan?

And what will this do to tourism? Tourism is Maui's major source of revenue. How long will visitors come if there are navy boats and personnel just off our beautiful beach?

This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities.

The military has miles of uninhabited beaches and lands to conduct your training all over the World. Why you would want to intrude on the public sector and destroy the delicate eco system and tourism in Maui? Please reconsider your locations and leave Maui alone.

Mahalo nui loa,

Mary Dungans and friends

21 Lopaka Place

Kula, Hi 96790

COPIES TO:

1. Malu 'Aina Center for Non-violent Education & Action - ja@malu-aina.org <mailto:ja@malu-aina.org>
2. US Fish and Wildlife - Sarah_Levy@fws.gov <mailto:Sarah_Levy@fws.gov> ; Jason_Holm@fws.gov <mailto:Jason_Holm@fws.gov> ; Miel_Corbett@fws.gov <mailto:Miel_Corbett@fws.gov> ; Brent_Lawrence@fws.gov <mailto:Brent_Lawrence@fws.gov> ; Rylan_Suehisa@fws.gov <mailto:Rylan_Suehisa@fws.gov> ; Rylan_Suehisa@fws.gov <mailto:Rylan_Suehisa@fws.gov> ; Jane_Chorazy@fws.gov <mailto:Jane_Chorazy@fws.gov> ; Jane_Chorazy@fws.gov <mailto:Jane_Chorazy@fws.gov>
3. Sierra Club - contact@mauisierraclub.org <mailto:contact@mauisierraclub.org> ; hawaii.chapter@sierraclub.org <mailto:hawaii.chapter@sierraclub.org>
4. Maui Tomorrow - info@maui-tomorrow.org <mailto:info@maui-tomorrow.org>
5. Malama Maui Nui - info@MalamaMauiNui.org <mailto:info@MalamaMauiNui.org>
6. Change.org info@change.org <mailto:info@change.org>
7. Senator Mazie Hirono - hawaiioffice@hirono.senate.gov <mailto:hawaiioffice@hirono.senate.gov>
8. Senator Brian Schatz - casework@schatz.senate.gov <mailto:casework@schatz.senate.gov>
9. Representative Tulsi Gabbard - TulsiOffice@mail.house.gov <mailto:TulsiOffice@mail.house.gov>
10. Maui News –opinions@themauinews.com <mailto:–opinions@themauinews.com>
11. Maui Now - editor@mauinow.com <mailto:editor@mauinow.com> ; wendy@mauinow.com <mailto:wendy@mauinow.com>
12. Hawaii Free Press - Editor@hawaiiexpress.com <mailto:Editor@hawaiiexpress.com>
13. Maui Native Hawaiian Chamber of Commerce Doreen Napua Canto, President kehaulani1976@gmail.com <mailto:kehaulani1976@gmail.com>
14. Kimokeo Foundation, Kimokeo Kapahulehua honokohau@gmail.com <mailto:honokohau@gmail.com>



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Mary Dungans (mary@red-jeep.com)

Dear Mary Dungans and 31 Additional Signatories:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

NSWC does not anticipate disruptions to the community, local economy, tourism, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and does not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site.

At the time of the Draft EA, some coordination and consultations had begun, and additional coordination and consultations were planned with federal and state agencies but had not yet occurred. Consultations have since occurred and are completed with the USFWS, NMFS, Coastal Zone Management Program of the Hawaii State Office of Planning, and the State Historic Preservation Officer. Please see Section 1.7.1 (Agency Consultations and Coordination) and Appendix A (Agency Correspondence) of the Final EA.

During the preparation of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA."

The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. In addition, Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries and Consultation with the Office of National Marine Sanctuaries regarding the Proposed Action and the Hawaiian Islands Humpback Whale National Marine Sanctuary is not required. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including humpback whales or the Hawaiian monk seal and its critical habitat. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the

Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: January 2, 2019 comment letter from Mary Dungans.

Copy to: Hawaii Department of Land and Natural Resources

C.10 Draft EA for Naval Special Operations Training in Hawaii – Comment Response Letters to Individuals

Individual comment letters and associated Navy response letters are provided below.



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Kalia Naia (info@haleopueo.com)

Dear Kalia Naia:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and included in Appendix C (Public Comments and Responses) of the Final EA.

The Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6 (a)) "direct agencies to make diligent effort to involve the public in preparing and implementing their NEPA procedures", however public meetings are not a requirement for EAs. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from Kalia Naia.

Copy to: Hawaii Department of Land and Natural Resources

From: Kalia Naia <info@haleopueo.com>
Sent: Sunday, November 25, 2018 3:43 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] This idea to have military exercises on the Kohala coast is outrageous!!

Please let me know if there is a meeting in person so I can put out the word to the people impacted by this. This is a recreational coastline to many many people, a sensitive ecological area and its hard to believe this could happen in our front yards. This is truly absurd.

Kalia



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 2, 2021

Toni Withington
PO Box 76
Hawi, HI 96719

Dear Toni Withington:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200 and 40 Code of Federal Regulations [CFR] Section 1508). The Draft EA anticipated a Finding of No Significant Impact (AFONSI). Based on the analysis presented in the Draft EA, consultations with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and Hawaii State Historic Preservation Officer (SHPO); coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI associated with the implementation of the Preferred Alternative as described under Proposed Action (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA).

As described in Chapter 3 (Affected Environment and Environmental Consequences), all potentially relevant environmental resource areas were initially considered for analysis in the Draft and Final EAs. In compliance with NEPA, Council on Environmental Quality guidelines, and 32 CFR Part 775 guidelines, the discussion of the affected environment (i.e., existing conditions) focuses only on those resource areas potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas. Although proposed training activities on the Island of Hawaii include over-the-beach training, the Proposed Action does not include the use of Drop Zones as no air-based training activities are proposed for the Island of Hawaii (refer to Tables 2-3 and 2-4 of the Draft and Final EAs).

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. The purple area depicted on the maps in the Draft and Final EAs is a study area for purposes of analysis and is greater in area than the sites where training activities would occur. Areas of cultural importance noted in the letter such as the Lapakahi Park, Ala Loa Trail and Ala Kahakai National Historic Trail are not included in the Draft and Final EAs because no training is proposed in these areas. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of Naval Special Warfare Command (NSWC), initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii SHPO, National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy also appreciates your additional comments and discussion during an August 5, 2020 teleconference call with NSWC and EA personnel, particularly your concerns about effects of the proposed training on historic properties on the Island of Hawaii. The notes from that meeting are included as Enclosure 2.

5000-45E
N45
April 2, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R
.1229438936

Digitally signed by
ENG.SHERRI.R.1229438936
Date: 2021.04.02 11:49:06
-10'00'

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosures: 1. December 7, 2018 comment letter from Toni Withington.
2. Meeting notes from August 5, 2020 teleconference call between Toni Withington and NSWC and EA personnel.

Copy to: Hawaii Department of Land and Natural Resources

Ka Makani O Kohala Ohana – Kako’o

P.O. Box 76

Hawi HI 96719

December 7, 2018

To:
Samuel Lemmo
Office of Conservation and Coastal Lands Administrator
Department of Land and Natural Resources, State of Hawai'i
1151 Punchbowl St, Room 131
Honolulu, HI 96813. sam.j.lemmo@hawaii.gov

Meagan Ostrem
ManTech International Corporation
420 Stevens Ave., Suite 300
Solana Beach, CA 92075. Meagan.ostrem@mantech.com

Subject: Naval Special Operations Training Hawaii Draft Environmental Assessment

We are a non-profit community organization in North Kohala, Hawai'i County, that has been working for over 30 years to preserve the open nature, historic significance and recreational use of the 29 miles of our undeveloped coastline. Our membership at times has exceeded 400 families. We are very knowledgeable about the environmental conditions, archaeological and cultural significance, and subsistence and recreational uses of the leeward coast that is subject to the DEA before you. With four other Kohala organizations we have been actively working to prevent development and promote the public purchase of the private lands of the leeward coast. Attached is a brochure of our work in that regard.

We strongly agree that the DEA does not identify properly the environmental resources of the area between Kawaihae and Mahukona.

1. The impacts of the training exercises as outlined in the DEA would go well beyond those identified.
2. The exercises would impact resources that the DEA does not identify.

We recommend that you do **not** issue an AFONSI for this project. We prefer the No Action Alternative, at least relating to the North Kohala portion. If the training exercises are to proceed, it is clear to us that the State of Hawai'i should require a full Environmental Impact Statement.

Reasons why the DEA does not identify resources properly:

- A. This area of the North Kohala coastline is identified as having "the highest density of intact pre-contact archaeological sites in the State of Hawai'i." While some of the properties have been subject to archaeological survey, much of the private land has been not surveyed or under surveyed. The

ENCLOSURE 1

public lands have not been surveyed except for the land at Lapakahi State Historic Park, which is the place of several ancient villages preserved in a condition unparalleled in Hawaii. A preliminary survey of portions of the private land done by Bishop Museum in 1980 reveals the high concentration of sites and pre-contact sites, a finding that stalled, and eventually halted, plans to develop a resort. Studies of parts of the land subject to this report have not yet been surveyed.

- B. The DEA does not identify the high cultural importance of this area that extends, not only on the land, but seaward as part of fishing reservations, Hawaiian navigational significance and a marine protected area, which has been expanded beyond the boundaries of Lapakahi Park. The DEA does not identify the significance of the Ala Loa, the ancient trail that is a registered historic site and the pathway of the Ala Kahakai National Historic Trail. In addition to the coastal trail there is a royal trail transiting this entire area that has been identified only in a few places, but which was the path reserved for King Kamehamehá, the royal family and all. It is not mentioned in the DEA.
- C. The DEA identifies Over the Beach Activities, Drop Zone Activities and the possibility that military vehicles will be using roadways to get to the shoreline in specific, but not named, incidents. There are only two paved road from the Akoni Pule Highway to the ocean - Kawaihae and Mahukona. Between there are only rocky unpaved 4WD trails, many of which cross or are very close to the significant archaeological sites mentioned above. The potential for damage to these sites, by these unnamed, unspecific activities is too important to be ignored. They are not addressed in the DEA.

There are many more reasons why the DEA does not adequately address the impacts of the proposed military exercises, including disruption of fishing, gathering and recreational activities, as well as the disruption of the marine life. But these reasons mentioned above are enough for either a selection of the No Action Alternative, or a finding of impacts significant enough to call for an Environmental Impact Statement. If the latter, we would like to be a consulted group in the writing of the EIS.

We have no objections to the planning of military exercises. We support the concept of a prepared military. We feel that the impact on our portion of the proposed exercises has not been adequately addressed.

Malama Na Lihikai O Kohala

Toni Withington
Toni Withington, President

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Wednesday, August 5, 2020

Time: 1340-1435 (Hawaii time)

Location: Teleconference

ATTENDEES

<i>NAME*</i>	<i>ORGANIZATION*</i>
T. Withington (TW), President	Kamakani 'O Kohala 'Ohana (Kako'o)
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
J. Bigay (JB), PM and NEPA Planner	NAVFAC Pacific
S. Daugherty (SD), Sr. Associate Counsel	NAVFAC Pacific
J. Fong, Archaeologist	NAVFAC Pacific
R. Spaulding (RS), PM	ManTech International Corp.

*Notes: *NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager.*

Purpose

The purpose of the call is to follow-up with Toni Withington regarding her December 7, 2018 comment letter on the November 2018 Draft EA for NSO Training in Hawaii. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

Introductions

- **JB:** welcomed everyone to the call and provided a quick introduction to the attendees (see above table) on the Navy side and their role in the EA process.
- **TW:** President of a group in Kohala called Kamakani 'O Kohala 'Ohana (Kako'o). In response to the NSO Training EA, the group was the spokesperson for 5 community groups in N Kohala. Those groups, and many others, have worked for almost 50 yrs to preserve the N Kohala coastline. They realized early on that once the coastal highway was built the coastline would be open to rampant development as happened in other coastlines throughout Hawaii. Goal is to preserve the coastline and keep it open for public use. Have successfully objected to inappropriate coastal development. Have worked with the state and county government to prioritize and improve the rules and regulations regarding construction and development of coastal areas. In the last 15 yrs have worked with private landowners to arrange funding to purchase private lands to make it public open space. Much of the land on the leeward coast is owned by the state of Hawaii. Provided via email a brochure that summarizes the goals and objectives of the group and what they have accomplished. They feel that the Kohala coast is too pristine and too important historically and environmentally to support military training exercises on land and in the water.
- **MP:** provided an overview of the proposed naval special operations training in Hawaii.
 - Naval Special Warfare has been conducting training operations in Hawaii since 1994. Hawaii was chosen due to warm water and collocation with numerous military assets throughout the state of Hawaii. Goal of the proposed training is to leave no trace of the training while it is happening and after it has been completed. If they leave a footprint, broken branch, or any debris then they have failed the training. Each member of a Navy Sea, Air, and Land (SEAL) team must remain undetected during training. If anyone of them is photographed, it could jeopardize themselves and their families and they would no longer be able to accomplish their mission as a SEAL.

ENCLOSURE 2

- As defined in the EA, the training study area study in for Hawaii Island is larger than really needed because it was necessary to assess a larger area without identifying specific training sites that could potentially impact the security of training and the SEALs. If specific sites were identified during the EA process, then the process could be considered pre-decisional as the sites have already been chosen. By looking at a larger potential training area, additional areas can be considered for training pending the outcome of the impact analysis presented in the EA. Training would be limited to smaller sites that have the consent of property owners before any training activity occurs. In addition, if a particular site is chosen and approved as a training site at the end of the EA process (including obtaining real estate agreements and right-of-entry permits), if in a year, 5 years, etc. the landowner decides they no longer wish to have NSO training on their property, the Navy can go back to the analysis within the larger training study area and consider other sites that could potentially support NSO training that were not carried forward during the initial EA process.
- No air-based training (i.e., no aircraft or drones) is proposed for Hawaii Island.
- Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail.
- Land vehicles would be used only for safety/emergency reasons, would travel on existing established roadways, and would operate the same as civilian ground transportation. No off-road driving.
- Three areas within the training study area on Hawaii Island are being considered. One is Kawaihae Harbor that the military currently uses.
- A typical training scenario would be up to 18 individuals in the harbor. Trainees would arrive from a support vessel off the coast via an electric submersible; it would not be launched from land. The sonar on the submersible that is used for navigation is equivalent to a standard off-the-shelf fish finder that is used by commercial and sports fishermen. Trainees will maneuver the submersible in accordance with a training scenario, exit the submersible, swim into the harbor, conduct the training, and then swim back to the submersible, re-enter, and then exit the area.
- There will be two ≤ 25 -foot support boats (rigid-hulled inflatable boats [RHIBs], similar to a Zodiac or similar inflatable boat) offshore. Support personnel will watch the trainees and ensure their safety, other personnel will watch for civilian boat traffic. The public will not be denied access to any area and no area will be closed during training.
- Training typically occurs at night, lasts 2-4 hrs, and primarily occurs around midnight.
- One site would include over-the-beach (OTB) training. There will be 6-12 trainees (depending on whether there is one or two submersibles), come in from the water, exit the submersible close to shore, move onto shore (OTB), and then seek out an objective on land (e.g., a package or an individual staged in a specific spot). Once the objective is found, they then exit OTB, to their submersible, and return to the support vessel offshore.
- A couple of hours before training begins, support personnel will check out a proposed training site to determine the presence of the public and the level of activity. If the area has a lot of public activity, another site will be chosen.
- If during a training exercise a commercial or recreational fisherman or other user begins to move towards the training area, the support watch personnel will monitor the boat's activity. If a fisherman or other user comes too close to a training activity, they will be informed that a Navy training activity is underway and may be asked to stop. If they do not wish to stop, then the training will stop. The training activity will either be halted momentarily until the fisherman or other user leaves the area, or the training will be stopped and the Navy personnel and trainees will leave the area. The goal is to never disrupt or stop any civilian activity during a NSO training activity.

- Training would occur up to 10 times/yr. but is not expected to ever reach that level at any proposed training site. Typical training is 2-4 times/yr.; therefore, 2-4 hours, 2-4 times per year.
- No air-based training, no climbing, no digging, and no live-fire of weapons.
- Looking for variety across many environments across many islands. Each site has different scenarios, challenges, and environmental features. SEALs will become familiar with a site after only 1 or 2 visits, so variety is important.
- **TW:** You stated 2-4 times/yr. Is that training sessions or is that 2-4 times that the SEALs will be doing the exercise?
- **MP:** There may be times that training does not occur at Hawaii Island for a year, 2 years, or 3 years. However, training is dependent on the training requirements at the time. Hawaii Island may have a particular current or other feature that they need to train to at a particular time, but not every year.
- **TW:** Is it 2-4 times that a single unit will come or is it a series of sessions with multiple units? Is 2-4 times a year, is that sessions? Will they be here a week or 2 weeks, 2-4 times/yr? How long will the training be?
- **MP:** Training is 2-72 hrs, and could be at a site for a week, where they could conduct two of the 2-72 hr training; however, typically training is only 2-4 hr.
- **TW:** How many years does the EA cover, how many years will you conduct the training?
- **MP:** EA does not have an end date. However, if there are changes to the type of training, including new types of training exercises or methods (e.g., based on world events), vehicles used, etc. then the EA is no longer valid. Are expecting the analysis in the EA to be valid for 10-15 years but that is unknown as things may change given the innovative nature of SEAL teams and their training requirements.
- **Steve Daugherty (SD):** There must be a significant change in the types of activities. If the proposed training adds only another trainee to the training scenarios and impacts do not change, then that is not a significant change and the EA is still valid. If the action changes and then the impacts change, then the Navy needs to conduct supplemental analysis.
- **TW:** So if you went over 2-4 times/yr?
- **SD:** No, as the EA is assessing training activities up to a maximum of 10 times/yr. We are not expecting training activities more than 2-4 times/yr, but the maximum option assessed in the EA is up to 10 times/yr, which allows flexibility. Under this EA, the Navy would be allowed training up to 10 times/yr. If they were to propose more than 10 times/yr, then a supplemental analysis would need to be prepared to address the potential impacts from training more than 10 times/yr.
- **TW:** On the over-the-beach landing. Are those the exact words “beach” or is it shore?
- **MP:** Over-the-beach, OTB.
- **TW:** Definition of a beach is one thing. Our shore has very few beaches, only a few small patches of sand. Because of our concern about the shore, the over-the-beach part is the part that is most problematic for us. Does our section of the coastline from Kawaihae to Mahukona, does that look like where you would do an over-the-beach?
- **MP:** We are considering a very small section where we are hoping to do OTB. It’s a matter of getting permission from the property owner once we complete the EA to use that area.
- **TW:** Can you tell me if that property owner is government or private?
- **MP:** We don’t know yet. Prepared maps but have yet to look at property lines. They are looking to areas that have a challenge such as currents or how to get into and out of an area. They want to avoid coral due to damage to themselves, a submersible, and the coral itself. They want to avoid coral at all costs and focus on sandy areas. The purple training study area provides an example of an area to assess.

- **SD:** Once the EA has been approved, there will be separate negotiations with the land owners in order to get right-of-entry and no training activities would occur at any site prior to obtaining rights of entry.
- **TW:** What is status of the EA, it has been 2 years, it has been a while. Has the accepting agency accepted the EA or FONSI or are you moving to an EIS?
- **SD:** It's still a draft EA and moving forward to a Final EA.
- **TW:** Who is the accepting agency? Who makes the decision about the FONSI?
- **MP:** The Navy.
- **RS:** For the Hawaii Environmental Policy Act (HEPA) process, it is the Hawaii Department of Land and Natural Resources (DLNR).
- **JB:** Because this is a joint DoD EA and State of Hawaii EA because some of the areas proposed for training are on state lands, and the Navy is following the state guidelines (HEPA process).
- **TW:** Will the people who have made comments on the Draft EA have a chance to make comments on the Final EA before it goes to the accepting agency?
- **JB:** It would be approved by the agency of the state before it goes to the public.
- **TW:** You have made no amendments to the EA since the time of the Draft EA?
- **SD:** Amendments are being made and we are responding to public comments and the action is changing in some places, but we have not released anything to the public. It is still in draft.
- **TW:** That answers my question. It would be in our interest to see the EA before it goes before DLNR or any place where there is any chance the public can comment. Mainly to see any amendments that have been made. We deal with a half dozen EAs a year and amendments can be made and the EA doesn't resemble to what you commented on. Do you have any other information to provide, because I have a few comments to make.
- **JB/MP:** We are waiting for you; we are here to listen.
- **TW:** There are few things that have changed since our comments were made on the Draft EA.
 - Hard economic times before covid. We had a serious homeless problem at that time and it has only increased. Our group stewards land parcels as well as monitors state lands. Finding that there is an increase in transient families camping on coastal lands, using 4-wheel drives and leaving trash. The Navy needs to be aware of increased presence of people living/camping on the coast than when the project started.
 - I am aware of all private landowners along the coast and know most of them personally. I don't think you would get permission from any private land owner. The state owns a fair amount of land along the coast, and that is where the homeless are camped out.
 - Most of the archaeological surveys that has been done on the coast has been done on private lands. Quite a bit of data on private lands. Almost no work on state-owned property. If you wish to use any state property you would be in areas that have not been surveyed. The only area that has been surveyed on state land is Lapakahi State Historical Park, south of Mahukona. It is a restored fishing village and shows how populated the coast was 600-700 years ago.
 - This area of the coast has been identified as having the highest density of pre-contact archaeological sites in the state. Many shrines, heiau, gathering places, etc. All these sites are before western contact and are unsurveyed.
 - Concerns in an emergency if you had to use a dirt/rock road to access the beach and the potential to impact unsurveyed areas.
- **MP:** no access from land; support vessel is offshore with medical help and trucks would not be used.
- **TW:** Can you remove the text in the EA regarding the use of land vehicles during an emergency?
- **MP:** We don't have the authority to make a decision at this time. We will take the concern forward for discussion. It is not possible to determine if there would be an emergency and if access via land would be needed.

- **TW:** An example of how an action was proposed and then during discussions agreement was made about the action. During the Marine Corps EIS to use MV-22s at Upolu Airport agreed to use the airport only for emergencies. They are now using it more for emergencies than they proposed to use regularly.
- **MP:** We are only proposing to use an area a maximum of 10 times/yr. Emergencies would not occur 10 times/yr; if there was an incident the first time, highly unlikely there would be an incident for any future training.
- **TW:** confirm study area is the whole western side of Hawaii Island. The area that I am concerned with is between Kawaihae to Mahukona. What are chances of all 10 exercises/yr occurring within our area of interest?
- **MP:** Unable to determine at this time as we need to wait for the EA process to finish and to obtain the real estate agreements and right of entry permits. Until those are obtained, we do not know which sites where we may potentially train. The advantage of the proposed training is the flexibility and that if there is a particular location that has some sensitivity, the SEALs can move 10-15 ft to the south/north, etc. to avoid a location. This avoidance can be included in their training within the training site.
- **SD:** Also add when they obtain the right of entry for a particular site, they will have to comply with any limitations that the land owner imposes on that right of entry.
- **TW:** Thank you. I can think of only one section of the coast (Ahupua a Kaiholena) area in Hawaii where Hawaiians have legal status over the ocean, and it is connected to Kamehameha. If you used this area you will need to get permission from cultural practitioners, and is one of the areas we steward. You are saying that the line of communication is open and getting permission would be an important step the Navy would have to take.
- **TW:** Be aware that many people along the coast fish at night. Depends on phase of moon, often before and after midnight. You may run into night fisherman during training activities.
- **TW:** I have a great regard for SEALs, the training they do, and the people they recruit. I'm not anti-military and just want the area is preserved with the respect that it is due.
- **TW:** Are the comments made today considered part of the comments from our group?
- **SD:** They will be considered as part of the 6E consultation as the public comment period for the Draft EA has closed.
- **MP:** Thank you for your input.
- **Mahalo and Aloha!**



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Pamela Huggins (hugginsp@gmail.com)

Dear Pamela Huggins:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

The proposed training is similar to hiking, swimming, diving, and camping, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence during or after training activities. To conduct activities in State or County parks, NSWC will coordinate with land managers and obtain permits as is required, prior to the use of specified public lands. Training activities would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use.

As described in the Draft and Final EAs, the proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measureable change due to the Proposed Action. Ground transportation support is discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training).

Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation. The Proposed Action would not change or alter transportation facilities or circulation of traffic patterns within the training study area or surrounding area.

5000-45E
N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 3, 2018 comment letter from Pamela Huggins.

Copy to: Hawaii Department of Land and Natural Resources

From: Pamela Huggins <hugginsp@gmail.com>
Sent: Monday, December 3, 2018 2:41 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military Training @ Mahukona & Along The Northern Coast of the Big Island

I have lived in Hawi, Hawaii on the Big Island for 8 years. As a small business owner, voter and someone who moved here to escape the noise and pollution and busy-ness of the mainland, I strongly urge you to reconsider doing military maneuvers at Mahukona and along the coast from Kawaihae to Opolu Airport.

This is a PRISTINE community, not like others in the United States. Everyday, people from North Kohala enjoy the park for swimming, diving, fishing, picnics and family and friend gatherings. This is our back yard and the only beach we have easy access to. What you are proposing would disrupt the eco system of fish and underwater growth that we have left. It also causes great stress and added health concerns for those here with damaged nervous systems and other health issues that BROUGHT us here to heal in the peace and quiet in our precious natural environment.

There is an enormous amount of archeological history here, many VERY endangered species that can NOT take the stress of more disturbances and ancient Hawaiian fishing rights that need to be honored. Additionally, a HUGE portion of our community depends on safe and easy transport to the hotels for their wages and caring for their families -- that cannot be late due to the slow downs of the long convoys on the roads that happen when these exercises are taking place.

Please do NOT follow through with the proposed military activities at Mahukona, or really anywhere that people enjoy being by the ocean on the Island of Hawaii. I understand these exercises must be done, but there are many places that are ALREADY loud and polluted. Please go there. This is one of the few remaining quiet places in the US. Please do not take this away from those of us with extremely sensitive nervous systems that moved here for our health -- in NEED of the peace and quiet.

Thank you,
Pamela Huggins

Pamela Huggins, Publisher
Hawaii Island Regional Business Directories
808-895-8769

pamela@hirbd.com <mailto:pamela@hirbd.com> <http://hirbd.com/>



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 6, 2021

Representative David A. Tarnas
Hawaii State Capitol, Rm 328
Honolulu, HI 96813
reptarnas@capitol.hawaii.gov

Dear Representative Tarnas:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

As described in Chapter 2 of the Draft and Final EA, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Not all sites within the training study area would be utilized over a 1-year period. Under the Preferred Alternative (Alternative 2), training would occur up to 10 events at an individual non-federal training site/year (maximum total of events on all non-federal sites would be 330 events) and up to 265 events of training on Federal property per year (see Table 2-4 in the Final EA). Only water-based and land-based training is proposed for the Island of Hawaii; no air-based training would occur. Please note the purple area depicted on the maps in the Draft and Final EAs is a study area and is greater in area than the sites where training activities would occur.

The Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State of Hawaii regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (Hawaii Administrative Rules section 11-200-3). Naval Special Warfare Command (NSWC) published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review

November 8, 2018 through December 10, 2018). The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy utilized the best available science to identify the existing terrestrial and marine biological resources in the training study area in Section 3.3 (Biological Resources), including threatened and endangered species, critical habitat, and wildlife management areas. Training would not occur within or adjacent to ponds, including anchialine ponds. The Final EA has been revised to include discussion of marine sanctuaries. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine and terrestrial biological these resources with implementation of the Proposed Action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Area of Potential Effect (APE) for National Historic Preservation Act (NHPA) Section 106 is synonymous with the project Study Area and has been revised for the Final EA. Training would be conducted in selected coastal nearshore waters and shorelines, and inland locations throughout the State of Hawaii. The APE, or Study Area, is larger than the actual area that would be used for the proposed training due to the application of buffer areas, and would be limited to smaller sites on federal land and on state and private land - the latter of which would have the consent of property owners before training activity occurs. The APE/Study Area for Hawaii Island consists of three separate segments of the western coastline: from north to south, the first segment includes the Kohala coast from Mahukona Bay/Beach Park to Kawaihae Harbor; the second segment is from Kahuwai Bay to Puhili Point on the Kona coast; the third segment is from Honokohau Small Boat Harbor to Kahului Bay, also on the Kona coast. Based on coordination and discussion with the National Park Service, the Kaloko-Honokohau National Historical Park and Kealakekua Bay have been deleted from the APE/Study Area.

The Navy has identified several historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources, including Traditional Cultural Properties. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. Also, high-angle climbing is not proposed on Hawaii Island.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of

Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the NHPA for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Proposed Action is consistent with Hawaii Revised Statutes Chapter 6E as the Navy has completed NHPA Section 106 consultation with the SHPO and key stakeholders and followed the governing procedures to the maximum extent practicable. The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the existing recreational resources in the training study area. Training activities would not interfere with public use of water areas for aquatic recreation or land areas for beach use. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area. Please refer to Section 3.2 (Land Use - Recreation) for a full analysis of recreational resources.

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The Navy also appreciates your additional comments and discussion during an August 6, 2020 teleconference call with NSWC and EA personnel, particularly your concerns about effects of the proposed training on historic properties on the Island of Hawaii and other issues that you considered important to your constituents. The meeting notes from that phone call are included as Enclosure 2.

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April 6, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin The Environmental Notice on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R
.1229438936

Digitally signed by
ENG.SHERRI.R.12294389
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Date: 2021.04.06
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SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosures: 1. December 7, 2018 comment letter from Representative Tarnas.
2. Meeting notes from August 6, 2020 teleconference call between Rep. Tarnas and NSWC and EA personnel.

Copy to: Hawaii Department of Land and Natural Resources

**HOUSE OF REPRESENTATIVES**

STATE OF HAWAII
STATE CAPITOL
HONOLULU, HAWAII 96813

December 7, 2018

Department of Land and Natural Resources
State of Hawaii
Samuel Lemmo, Office of Conservation and Coastal Lands
1151 Punchbowl Street, Room 131
Honolulu, HI 96813

Aloha,

Thank you for the opportunity to review and comment on the Draft Environmental Assessment (EA) for Naval Special Operations Training in Hawai'i.

I appreciate the importance of training to ensure the safety and effectiveness of our military and support the Navy's effort to identify appropriate locations for a diverse set of training sites throughout the State of Hawai'i. However, in my assessment, this Draft EA lacks the thorough, site-specific analysis necessary to fully evaluate the proposed activities' potential impacts on cultural, recreational, and biological resources. Further, according to my reading of the Draft EA and discussions with constituents, the Draft EA process has not involved adequate consultation with coastal landowners and management agencies in the proposed study area. Without much more thorough resource analysis and consultation with stakeholders, the Draft EA lacks the necessary information to support a Finding of No Significant Impact.

The proposed training area encompasses over 40 miles of coastline on the Island of Hawai'i alone, including National Historic Parks, State Parks, public beaches and campsites, archaeological sites, and sensitive marine and coastal habitats. The Draft EA lacks the information, analysis, and consultation that would be necessary to fully assess environmental resources within this broad study area. For this reason, I support the No-Action Alternative, through which individual training events can be specifically evaluated to determine if an event-specific Categorical Exclusion is appropriate, or if an Environmental Assessment or Environmental Impact Statement is needed.

Representative David A. Tarnas
North Kohala, South Kohala, North Kona
Hawai'i State Capitol, Room 328 || Honolulu, Hawai'i 96813
Phone: 808-586-8510
Email: reptarnas@capitol.hawaii.gov

ENCLOSURE 1

With the aim of providing constructive comments to the preparers of this document, I outline below some of the gaps in the Draft EA that have informed my decision to support the No-Action Alternative.

Firstly, the Draft EA does not identify all the significant cultural and recreational resources in the proposed training areas in West Hawai'i. For example, there are significant terrestrial archaeological resources in this area that should be avoided, including sites on public lands, such as Kaloko-Honokōhau National Historical Park (NHP), Pu'ukoholā NHP and Lapakahi State Historical Park, and private lands such as Puanui in Kohala, and Makalawena and Keahuolū in Kona. There are also potential submerged archeological resources not addressed in the Draft EA in the nearshore waters adjacent to Kaloko-Honokōhau NHP and Pu'ukoholā NHP.

Secondly, the Draft EA does not fully address the potential impacts of water- and land-based training on public recreation. The very few sandy beaches that exist along the Kona and Kohala coastline are heavily used for public recreation. The study area also includes large sections of unencumbered state lands that are used regularly for wilderness hiking and camping. Groups of up to 46 military personnel carrying replica weapons could pose a significant disruption to public recreation at small beaches on the Kona-Kohala coastline and to the wilderness character of West Hawai'i's coastal recreation areas.

Thirdly, the proposed training area encompasses significant biological habitats not identified in the Draft EA, including anchialine pools, one of Hawai'i's unique and threatened ecosystems, which are present in many locations along the coast from Kaupulehu to Kailua-Kona. It also appears that the analysis of potential impacts on threatened or endangered species is incomplete. Table 3-6 does not include the Island of Hawai'i as a site where the following threatened or endangered species occur: Newell's shearwater, Hawaiian coot, Hawaiian duck, Hawaiian stilt, and the Orangeblack Hawaiian damselfly. The analysis also does not include the endangered anchialine pool shrimp (*Procaris hawaiiana*), which is present in the Kaloko-Honokōhau NHP on the Island of Hawai'i. These species' presence on the Island of Hawai'i and specifically within the training study area is noted in the US Fish and Wildlife Service Species List in Appendix A2, Enclosure 1 (p. A-15), but their presence is not addressed in the Draft EA.

It is important that the preparers of this NEPA document consult and communicate directly with the public, coastal landowners, and resource management agencies responsible for the coral reefs, nearshore waters, and shoreline. Most of the coastal landowners I contacted along the two stretches of coast on the Island of Hawai'i were unaware of this proposal, indicating that coastal landowners were not sufficiently consulted during the Draft EA process.

Representative David A. Tarnas
Naval Special Operations Training Hawai'i – Draft EA Comments
Page 2 of 3

Additionally, the extent of the proposed training activities has not been adequately communicated to stakeholders in the study area. According to my reading of the Draft EA (Tables 2-3 and 2-4), the training proposed would not include any air-based training at the identified coastal areas on Hawai'i Island. If this is the case, widespread public concern about the possibility of increased air-based training on Hawai'i Island as expressed through petitions in opposition to this project indicates that the proposed training has not been clearly communicated to the public. Please also note that the Draft EA does not specify the regions where Unmanned Underwater Vehicle Activities are proposed (UUV; not included on Tables 2-3 or 2-4).

Finally, the Draft EA's distribution list does not include all the key government agencies that should be consulted, including the National Marine Sanctuary Program (responsible for the Hawaiian Islands Humpback Whale National Marine Sanctuary) and the National Park Service (responsible for the Kaloko-Honokōhau NHP and Pu'ukoholā NHP).

In the absence of such information, consultation, and analysis, the Draft EA cannot adequately analyze the potential environmental impacts of the proposed activities, and thus cannot propose mitigation measures to prevent significant negative impacts. I believe the proposed training expansion is better suited to a site-specific approach under the No Action Alternative, through which training events and locations can be assessed individually, with appropriate attention to site-specific environmental resources and stakeholder concerns.

I hope my comments help the preparers of this document more fully and accurately assess the cultural, recreational, and biological resources within the proposed training area, and incorporate the input of stakeholders from our community. Please contact me if you need any additional information.

Mahalo,



David A. Tarnas
State Representative, District 7

Cc: Julie M. Zimmerman, Senior NEPA Planner, Naval Special Warfare Command
Meagan Ostrem, ManTech International Corporation

Representative David A. Tarnas
Naval Special Operations Training Hawai'i – Draft EA Comments
Page 3 of 3

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Thursday, August 6, 2020

Time: 1330-1425 (Hawaii time)

Location: Teleconference

ATTENDEES

<i>NAME*</i>	<i>ORGANIZATION*</i>
D. Tarnas (DT), Representative (N and S Kohala, N Kona)	State of Hawaii
Z. Sims (ZS), Staff Assistant	State of Hawaii
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
J. Bigay (JB), PM and NEPA Planner	NAVFAC Pacific
R. Rowland (RR), Assistant Counsel	Navy Region Hawaii
D. Kawakami-Wong, Assistant Counsel	NAVFAC Pacific
C. Rasmussen, Archaeologist	NAVFAC Pacific
R. Spaulding (RS), PM	ManTech International Corp.

Notes: *NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager.

Purpose

The purpose of the call is to follow-up with Representative David Tarnas regarding his December 7, 2018 comment letter on the November 2018 Draft EA for NSO Training in Hawaii. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

- **JB:** welcomed everyone to the call and provided a quick introduction to the attendees (see above table) on the Navy side and their role in the EA process.
- **MP:** provided an overview of the proposed naval special operations training in Hawaii.
 - We had a good discussion with Toni Withington yesterday and thank you Zoe for providing her contact information. She responded right away.
 - Goal of the proposed NSO Sea, Air, and Land (SEAL) training is to conduct the operation without being detected – leave no trace of their presence during and after training. If they leave a footprint, broken branch, or any sign that they have been at a site, then they have failed the training. If any SEAL team member is photographed, it could jeopardize themselves and their families and they would no longer be able to accomplish their mission as a SEAL.
 - Naval Special Warfare has been conducting training operations in Hawaii since 1994.
 - At this time, we are conducting the 6E process and are looking to address any comments from those individuals that requested consultation during the Draft EA review process. [*Note: subsequent to this discussion, it was determined that we are not conducting these discussions under the 6E process. These consultations are to support the HEPA process and to obtain information from stakeholders, agencies, and interested parties regarding their concerns with the proposed training activities.*]
 - We will review the main points of the Draft EA. The NSO mission is to conduct reconnaissance activities in a maritime environment. Hawaii was chosen due to warm water and collocation with numerous military assets throughout the state of Hawaii.
 - We stress that the goal of the training is to leave no trace during the training and after it has been completed.

ENCLOSURE 2

- Three broad categories of training: land-based, water-based, and air-based. Air-based training (i.e., no aircraft or drones) is not proposed for Hawaii Island. Air-based training would be conducted on Oahu or Kauai.
- Training basically includes small units of trainees, typically the capacity of a small submersible, which is launched from a surface vessel. Each submersible can hold up to 6 SEALs. At the most there would be 2 submersibles, each 20 ft long and 8 ft wide; electric powered. The sonar on the submersible that is used for navigation is equivalent to a standard off-the-shelf fish finder that is used by commercial and sports fishermen.
- Associated with each submersible, are two <25-foot support boats offshore (rigid-hulled inflatable boats [RHIBs], similar to a Zodiac or similar inflatable boat). Support personnel will watch the trainees and ensure their safety, other personnel will watch for civilian boat traffic.
- Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. Proposed training on Hawaii Island would occur at 3 locations. Based on coordination and discussion with the National Park Service (NPS), the Kaloko-Honokohau National Historical Park and Kealahou Bay have been deleted from the APE/Study Area. One of the proposed training locations is Kawaihae Harbor that the military currently uses.
- **DT:** Where in Kawaihae Harbor are you proposing?
- **MP:** Exact location is not known but training activities would include diver/swimmer. I will go over the basic training activities and this may help you understand what will be done.
 - The exact location of the 3 proposed training locations are not shown within the purple training study area depicted on the maps in the Draft EA. We did not show the exact locations as it would be pre-decisional, we need permission from the property owners before we can state what the locations are, and there are concerns for operational security of training activities. Therefore, the large training study area was provided to assess the areas for the purposes of the Draft EA.
 - If a proposed training location is not feasible (e.g., the use of Kawaihae Harbor would not work due to large public use) and a right-of-entry is not approved by the property owner/manager, then we can look within the purple training study area for alternative sites given the entire training study area has been assessed for conducting proposed training activities. We would then coordinate with the property owner of this new potential training site to obtain a right of entry to conduct NSO training activities.
 - In addition, if a particular site is chosen and approved as a training site at the end of the EA process (including obtaining right-of-entry permits), if in a year, 3 years, etc. the landowner decides they no longer wish to have NSO training on their property, the Navy can go back to the analysis within the larger training study area and consider other sites that could potentially support NSO training that were not carried forward during the initial EA process.
 - Land vehicles would travel on existing established roadways, no off-road driving.
 - A typical training scenario would include 6-18 individuals, with 2 submersibles, 2 RHIB support boats no larger than 25 ft. No more than 7 personnel on the support boats including dive master, medical officer, and lookouts and boat drivers for both support boats.
 - Submersibles launched from a large Navy support vessel several miles offshore; nothing is launched from the Island of Hawaii. [*however, submersibles may also be launched from public boat ramps.*] Typically, the submersibles are launched within 2 miles of shore, accompanied by the 2 RHIBS, and activities occur at night.
 - The public will not be denied access to any area and no area will be closed during training. Public has priority within all areas. Access to any site is limited by the right-of-entry of the property owner and the Navy must comply with all requirements from the property owner within the real estate agreement/right-of-entry permit. We do not anticipate encountering the public due to the timing of training activities at night, around midnight.
 - Per Navy requirements, all drivers of the RHIBs have marine mammal monitoring training. They also have protective measures maps to inform them of potential sensitive species or other factors that they need to be aware of during training in a particular area.

- One RHIB follows the divers/submersibles and the other monitors civilian boat traffic in the area. If during a training exercise a commercial or recreational fisherman or other user begins to move towards the training area, the support personnel will monitor the boat's activity. If a fisherman or other user comes too close to a training activity, they will be informed that a Navy training activity is underway and may be asked to stop. If they do not wish to stop, then the training will stop. The training activity will either be halted momentarily until the fisherman or other user leaves the area, or the training will be stopped and the Navy personnel and trainees will move to another area.
- Trainees would approach a harbor in an electric submersible. Trainees will maneuver the submersible in accordance with a training scenario, exit the submersible, swim into the harbor, conduct 2-4 hrs of training, and then swim back to the submersible, re-enter, and then return to the large support vessel a few miles offshore.
- One site would include over-the-beach (OTB) training. There will be 6-12 trainees (depending on whether there is one or two submersibles), come in from the water, exit the submersible close to shore, move onto shore (OTB), and then seek out an objective on land (e.g., a package or an individual staged in a specific spot). Once the objective is found, they then exit OTB, to their submersible, and return to the support vessel offshore.
- Training would occur up to 10 times/yr. but is not expected to ever reach that level at any proposed training site. Typical training is 2-4 times/yr.; therefore, 2-4 hours, 2-4 times per year. Looking for variety across many environments across many islands. Each site has different scenarios, challenges, and environmental features. SEALs will become familiar with a site after only 1 or 2 visits, so variety is important.
- No air-based training, no climbing; primarily diver/swimmer training at Hawaii Island.
- Bulk of training is done in Pearl Harbor, then when trainees become proficient, they expand out to other areas of Oahu, and eventually neighboring islands. We do not anticipate training at Hawaii Island every year, and have not trained on the Island of Hawaii every year. There may be times that training does not occur at the Island of Hawaii for a year, 2 years, or 3 years. However, training is dependent on the training requirements at the time. The Island of Hawaii may have a particular current or other feature that they need to train to at a particular time, but not every year. A benefit of using the Island of Hawaii is limited artificial light and provides a greater challenge to find objectives.
- Training events are progressive in nature: may start with just driving the submersible, then having swimmers/divers exit the submersible, gradually working up to an OTB training activity.
- Training is 2-72 hrs at a specific location and is conducted from dawn to dusk.
- When the proposed action was first formulated, several Navy attorneys suggested that the proposed activities were not significantly different from current activities conducted by the public (i.e., swimming, diving, walking across a beach), and that impacts would actually be less given the goal of leaving no trace of the training activities (e.g., no beach fires, no trash left behind). Special Operations Command requires that any action requiring a real estate permit for access to a site, then the appropriate NEPA documentation must be prepared to support the permitting process which is done through NAVFAC. Therefore, an EA is being prepared to address the proposed NSO activities.
- To reiterate: no tree or cliff climbing, no construction or digging, no camp fires, no live-fire of weapons, no use of explosives, no air-based training; only water- and land-based training would occur on the Island of Hawaii, with land-based training at only 1 location.
- **DT:** When you say there are 3 sites, are there 3 sites in west Hawaii or 3 sites statewide?
- **MP:** 3 sites on the Island of Hawaii we are proposing to use, one of which is a portion of Kawaihae Harbor.
- **DT:** There are 3 and one of them is Kawaihae?
- **MP:** Correct.

- **DT:** There are 3 ramps in Kawaihae Harbor, a ramp, and the outer harbor, and was wondering which ramp you are referring to.
- **MP:** The military already uses or owns a portion of the Kawaihae Harbor. That portion would be used as well as the rest of the harbor.
- **DT:** We refer to that as the LST ramp, which is inside the commercial harbor basin. There are 2 other ramps in the harbor, small boat harbors, to the north and south of the commercial harbor. The LST ramp is within the commercial harbor.
- **MP:** The SEALs pulled together maps of the areas they proposed to use and were very specific. For example, I had proposed 800 linear feet of shoreline and thought this would provide what the SEALs needed, but they responded that no, they only needed 15 ft. There are features at each site (e.g., currents, bathymetry, etc.) that drew them to a specific site or area.
For Kawaihae Harbor, as you enter the harbor by boat, there is a square area to the left. A small marina, and this is where they propose to launch and recover.
- **DT:** That is the North Kawaihae Small Boat Harbor Ramp. The adjacent breakwater is all busted up due to a large surge last New Year's Day. The dock and breakwater were busted up with the dock being removed and the breakwater condemned. Heavily used by fishers even in the middle of the night. You will have to deal with that.
- **MP:** Yes, we do wherever we go and are respectful about that.
- **DT:** That's no problem. You have 2 other sites besides Kawaihae. Can you tell me where they are?
- **MP:** We don't yet have permission to divulge the locations of the other sites. Although we did brief the mayor and Congressional staff early on to determine the feasibility of the project. We didn't want to waste time and money if the state would possibly deny use of any site from the beginning.
- **DT:** Instead of causing an uncomfortable situation and asking you to tell me where the sites are, let's back up and look at the Coastal Zone Management Consistency determination from the CZM office that specifically refers the need to comply with the conditions from the Division of Aquatic Resources (DAR). The way I read the DAR comments that they are asking that you not use the areas circled in red that are within the West Hawaii Regional Fishery Mgmt Area and that no activities take place within these areas. Are you able to comply with that and not do any training in those 2 areas?
- **MP:** We spent 5.5 hours consulting with DAR so that we could comply with whatever requirements they had to enable NSO training to occur along the coast of Hawaii Island. They originally thought that training was going to be more extensive and impactful and that they were against any training within the entire west coast. The Navy met with DAR to discuss the details of the proposed action (first for 2 hrs and then a second time for 3.5 hrs after they had coordinated with other islands). What came out of the meeting was a listing of each site by name and the approved activities. Which was surprising given the Navy needs to balance the operational security issues with the public need to know. When this action was proposed 4 yrs ago it was suggested it be classified and the NSO Command was resistant. Given the attention the proposal has attracted, it may have been better to prepare a classified EA, given we are under surveillance from foreign powers.
The other sites are Mahukona Beach Park, where we propose OTB training on a small portion of the beach, but primarily swimmer/diver and submersible training offshore. The third site Honokohau Small Boat Harbor to conduct launch and recover, as well as diver/swimmer and submersible activities, avoiding the NPS property Kaloko-Honokohau National Historical Park. Originally the proposed water and OTB training would occur within the nearshore waters and within a very small beach area on NPS property. After discussions with the NPS, the Navy removed the OTB training from the park but still proposed swimmer/diver/submersible training in a small portion of the offshore waters of NPS property. The NPS then stated that the Navy would have to consult with more than 70 cultural practitioners. Given these concerns, the NPS property was removed as a potential training area and only the Honokohau Small Boat Harbor south of the NPS property is proposed for launch & recovery training.
Now you know more than most because of what we shared with DAR. At the end of the discussions,

DAR agreed to all areas except with changes to Waimea (Oahu) and Manele Bay (Lanai). To date, everything else was approved and we have received concurrences from everyone else; we are now going through the 6E process. *[Note: subsequent to this discussion, it was determined that we are not conducting these discussions under the 6E process. These consultations are to support the HEPA process and to obtain information from stakeholders, agencies, and interested parties regarding their concerns with the proposed training activities.]*

- **DT:** Our briefing from DAR still sounded like they still requested that you not conduct any training within the marine managed areas.
- **MP:** We can provide the concurrences that we received that say otherwise. They originally said that as they misunderstood the nature of the project and impacts, and we did not do a good enough job of explaining the proposed activities.
- **RS:** You may have the older original comments from June 2019 and not the revised set of comments and concurrence from June 2020.
- **DT:** I have the comments dated 6/29/2020, which is a modification of the original 2019 comments.
- **RS:** Yes, those comments at the end have been superseded by the new comments, giving approval for use of the various areas.
- **DT:** That's not how I read it.
- **ZS:** In their most recent comments for Hawaii Island, only 2 areas are mentioned in their comments: Kawaihae Harbor and Kaloko-Honokohau.
- **RS:** Yes.
- **ZS:** This is different than what Margherita mentioned a couple of other locations – Honokohau Boat Harbor and Mahukona.
- **MP:** We will have to review and verify what was discussed and what was in the DAR comments, and make sure that we follow what we said we would follow with DAR.
- **DT:** You are suggesting you wish to use 3 sites: 2 small boat harbors (Honokohau and Kawaihae) and Mahukona, which is a county park. I understand that those are the 3 but that's not clear but I do understand the security issues and do not wish to disclose the locations. The way I read this and after meeting with DAR, I understood that DAR did not want any training anywhere within the marine managed area. I misread that if you are reading it differently and I will check back with DAR. My concerns and comments were similar to DAR's. When you do a Chapter 343 process you do a lot of consultations with stakeholders and property owners and none of that had occurred, so this was a surprise. And you expressed surprise at the reaction you got. PTA has been trying to be transparent and talk about everything early so there are no surprises. DoD in general is trying to help everyone understand what training activities are and their importance. But when this proposal first came out it was a big surprise to everyone because there was no outreach at all. So that's why there was such a strong response, opposed to it, including mine. Pick your sites, do your site analysis, talk with stakeholders and do your NEPA or HEPA process. Don't do a programmatic one but on a site-specific basis. I've written EAs and EISs and writing a programmatic one does not allow you to really look at the specifics of a location. I understand the security concerns, but this is a hot button topic when activities are proposed along the coast, as people are very sensitive about coastal marine environment. We have established marine managed areas along the coastline and people take a personal interest and responsibility – hence the strong reaction. I appreciate the sites have been narrowed down, but DAR's comments need to be complied with. We both need to go back and determine what DAR meant and there is no misunderstanding. There are best management practices they have outlined that are important. I've seen small submersibles operate in shallow water and it is difficult. You want to be sure you have BMPs in place to prevent, reduce risks to damage to coral. I understand that the goal is that there be no evidence of your presence. I am a big supporter of military training. Just making sure you are being served well and the Draft EA was not a strong Draft EA. I hope the Final EA is better and discloses more information about your specific sites. The public won't react well if you try to hide it.

- **MP:** A dilemma in that the SEALs typically work in the background and are not used to high levels of public review or scrutiny. We are striving for a happy medium and will comply with DAR's requirements. I forgot to mention that before any training occurs there is a lot of pre-planning and mapping so as to avoid impacts from and to equipment such as submersibles. There are only a few in the world and cannot afford to damage any vehicle. BMPs and operational risk management are strictly followed, there are a lot of safety briefs before training, and debriefs after a training event.
- **DT:** Thank you, you are very thorough. Just letting you know what the public reaction will be and to help write things before they go out before the public. I am an environmental planner by profession. You have a tough client in that they don't want to say much, but Chapter 343 is all about disclosure. That is a challenge. The public wants to know the specifics and if you have narrowed it down to 2 small boat harbors (Honokohau and Kawaihae) and Mahukona), that's going to significantly limit the scope of potential stakeholders. Still there is the DAR process and the county will tell you what they need as Mahukona is under their jurisdiction. Urge you to be as transparent as possible, knowing the limitations. When you come out with Final EA tell as much as you can as people will want to know the details, consultations, BMPs and how you will comply with those protections. Be as thorough as possible. I want to continue to be involved. I thought you were to comply with DAR's earlier comments and you state you have been released from those, so I will coordinate with DAR to get clarification.
- **MP:** Cathy Gewecke is who we met with, and Robert Roland also attended to ensure that we understood what was requested and agreed to. DAR was very patient as we went over each site and explain what was proposed.
- **DT:** I will follow-up with DAR after this call so that we can understand what their position is, and if there are differences, I will encourage her to reach back to you.
- **MP:** Will revisit the sites again to ensure we are consistent and correct on our understanding and comply with everything we said we would comply with.
- **DT:** I will check with DAR right away and if they have a different understanding then I will have Cathy contact you right away. Your team needs to move forward.
- **MP:** Do you have contact information for Kauai Trainer?
- **ZS:** I do not.
- **DT:** All I have is an email.
- **MP:** We also have an email and there has been no response. She submitted comments and asked to consult so we would like to contact her to set up a teleconference call.
- **DT:** She is a school counselor at the Laupahoehoe Community Public Charter School. You might try calling her at the school. Good that you talked with Toni Withington. People will be very interested in knowing about Mahukona as there are few coastal access sites on the west side of Kohala.
- **MP:** We did not disclose the proposed use of Mahukona to Toni, only Kawaihae Harbor.
- **DT:** If you didn't disclose Mahukona to Toni she will be very surprised. Mahukona is in her front yard and a key coastal area that North Kohala residents use. If you didn't tell her, and she thinks you told her everything, she will be dismayed.
- **MP:** We are only proposing use of a small part of the park.
- **DT:** You did mention Mahukona to her?
- **MP:** No, we just mentioned the areas we were looking at were specific and small, but did not mention Mahukona. Training would occur around 2 am.
- **DT:** Understood and probably few people are currently camping there. People do fish and camp there. We understand that proposed training would not occur when there are lots of people at the park. But to have the military propose training in a public park in the coastal area, at Mahukona, people will want to know. They would be dismayed that this was not disclosed to them, and Toni will be dismayed when she finds out and that you did not tell her. You told me so am I sworn to secrecy?
- **MP:** We are telling you in confidence.
- **DT:** You told me, but I am a public official.

- **MP:** We trust you as another government official to maintain our confidentiality. You're placing me in a bad position.
- **DT:** I don't mean to put you in a bad position. I am trying to advise you as a State Representative what my feelings and perspectives and comments are, and being honest with you about people's reactions.
- **MP:** Trying to give you as much information as I can and still protecting our team.
- **DT:** I will have a difficult time not disclosing that you are talking about using Mahukona. I do not know what to do. I didn't realize you were telling me something that I should keep secret. These are things people should know. What do I do?
- **MP:** I respectfully ask that you not disclose it. We do not know if the park will allow us access.
- **DT:** Sure. But you are proposing to use the park if you can get permission from the county. Has the county given you permission?
- **MP:** We can't ask for permission until we complete the EA process.
- **DT:** You just talked to the mayor and did you tell him about the use of Mahukona?
- **MP:** Yes, we showed him the locations on the Big Island, and he had his city and parks director there, and his deputy, and as long as the analysis supports it, they were fine.
- **DT:** You received an initial preliminary, tentative approval that it is likely to be approved. Nothing is definite.
- **MP:** It is a possibility but doesn't mean likely. I was trying to be as open as possible within the NEPA process, this is what is proposed, and is this possible. Thank you so much for including us, and if you need anything or run into any difficulties, please contact us again. Thank you so much, and the mayor was very appreciative.
- **DT:** I am very uncomfortable that I am supposed to keep it secret that you are proposing to train at Mahukona. And I have to talk with my lawyers as you told me this during a consultation. This is directly relevant to the work I do. I have to ask my house attorneys. Am I bound by secrecy?
- **RR:** What is the difference between Mahukona and the other sites? We have all the documentation showing discussions with DAR and we haven't gotten approval. It is still a proposal and not an OPSEC issue.
- **MP:** My team is very sensitive to OPSEC.
- **RR:** Understood and as the Representative has stated, that has been the problem since the beginning. We have a public information document being prepared by a group that doesn't want to inform the public. For this specific example, we are asking him not to disclose the site information when you have already discussed with other elected officials and state agencies, I don't think this is an issue as it has already been discussed.
- **DT:** You need to disclose this to Toni Withington, and if you have failed to disclose Mahukona to Toni, then you should contact her.
- **MP:** We will do that. We wish to remain respectful and not mislead her in any way.
- **DT:** We will follow-up with DAR to make sure we are on the same page. Happy to talk at any time, and you can include me as one you consulted with. I appreciate your follow through and response to my comment letter. I urge you to be transparent and still have concerns that were expressed by DAR in their initial comments, and I still stand by them, and expect that you would still need to comply. But that is not the message you got. I will follow-up with DAR and find out their position and ensure that they convey that to you. I look forward to future conversations and wish to be helpful. Just so you know, in those 2 harbors there are harbor users' groups. I can provide contacts for those groups. You should check in with them. Kawaihae North is used by the canoe club. It is their kuleana, their responsibility. Anything that happens there is their responsibility and they would like to know about anything that happens there.
- **MP:** Can you provide those contacts via email. I would like to relay this to the team so that they can plan and follow up with them.

- **DT:** I hope you have already talked to them and not sure who you have talked to at the harbors. You must already have some names.
- **MP:** No, we don't.
- **DT:** I will provide some suggestions for stakeholders for the 3 locations that you have identified,
- **MP:** If the harbors are public areas does a user have to get permission from these groups?
- **DT:** You do not need their approval and they do not have regulatory authority. I would classify these groups as stakeholders and in the Chapter 343 process you consult with stakeholders. This is what I am assisting you with, is identifying stakeholders. These groups take care of/adopt the area and keep it clean, fix it up after storms, keep an eye on it for security.
- **MP:** Please provide the stakeholder information that you mentioned.
- **DT:** I will provide some information. But I thought that you would have already reached out to them as part of the Chapter 343 process. We have some homework to do. We'll get back to you and also check with DAR. Look forward to the next conversation. Thank you.
- **Aloha.**

Follow-up email communications with Toni Withington after the August 6, 2020 Conference Call

From: Parrent, Margherita L CIV USSOCOM NSW (USA)
Sent: Friday, August 14, 2020 4:17 PM
To: toni withington
Cc: Bigay, John C CIV USN (USA); Spaulding, Rick; reptamas@capitol.hawaii.gov; Zoe Sims
Subject: RE: Re: FOLLOW-UP REGARDING EA for NSO TRAINING IN HAWAII (6E and Withington)

Aloha Toni,

This additional information is exactly what we needed to know. Really appreciate the updates and am copying all to ensure transparency.

Of course we will keep you posted.

Mahalo,
Margherita

Ms. Margherita Parrent
Deputy Facilities Director
Naval Special Warfare Group THREE

From: toni withington
Sent: Friday, August 14, 2020 8:47 AM
To: Parrent, Margherita L CIV USSOCOM NSW (USA)
Subject: [Non-DoD Source] Re: FOLLOW-UP REGARDING ENVIRONMENTAL ASSESSMENT for NSO TRAINING IN HAWAII...PHONE CONFERENCE CALL WEDNESDAY 5 AUGUST 1:30PM

Aloha Margherita,

Thanks for calling me. I really appreciate the chance to offer more information about Mahukona.

After our call I realized that I had not mentioned that the County of Hawaii still allows permits for overnight camping at Mahukona Park. Surety Kohala, managers of the land surrounding the harbor, also allows limited, permitted overnight camping at the cove just north of the harbor, mostly for fishermen. I have noticed that there is less camping at both locations since the COVID thing, but there are still some families that like to use them. You may know this, but thought it might be relevant.

Please keep me posted, and I will let you and John know if I hear of any changes.

aloha, toni

On Thursday, August 13, 2020, 01:18:56 PM HST, Parrent, Margherita L CIV USSOCOM NSW (USA) wrote:

Aloha Toni,

As promised here is my follow-up email.

Really appreciate your quick response yesterday to my voice mail. Can you provide us the names of the five organizations you represent as well?

Regarding the possible use of Mahukona Beach Park your concerns are duly noted :

- 1) In heavy use by the public as it is one of the few places people can actually drive to the beach/area.
- 2) Much fishing takes place at this area especially at night and typically no later than midnight.
- 3) A long term initiative is underway to purchase areas surrounding the current park.

We will ensure that these concerns along with the others voiced in our first 6E consultation are duly noted in our final EA.

Mahalo,
Margherita

Ms. Margherita Parrent
Deputy Facilities Director
Naval Special Warfare Group THREE

From: Bigay, John C CIV USN (USA)
Sent: Tuesday, August 4, 2020 11:05 AM
To: toni withington
Subject: FOLLOW-UP REGARDING ENVIRONMENTAL ASSESSMENT for NSO TRAINING IN HAWAII...PHONE CONFERENCE CALL WEDNESDAY 5 AUGUST 1:30PM

Aloha, Ms. Withington,

Please join us for the planned conference call on the subject EA on WEDNESDAY, 5 AUGUST, 1:30pm (1330 hrs).

The toll-free phone number is: 1-866-880-0098; following the recording that you should then receive, type in the Access code: 8383141 (it may ask for you to end it with the # key).

If you have any access problems, please email me or call my number below.

Mahalo!

John Bigay
NEPA Planner
NAVFAC Pacific



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 2, 2021

Alapaki Nahale-a
Kamehameha Schools
16-716 Volcano Rd.
Kea'au, HI 96749

Dear Alapaki Nahale-a:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Draft and Final EAs were prepared using the best available science and includes over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (AFONSI). Based on the analysis presented in the EA, consultations with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

As described in Chapter 2 of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Not all sites within the training study area would be utilized over a 1-year period. Under the Preferred Alternative (Alternative 2), training would occur up to 10 events at an individual non-federal training site/year (maximum total of events on all non-federal sites would be 330 events) and up to 265 events of training on Federal property per year (see Table 2-4 in the Final EA).

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the Naval Special Warfare Command (NSWC) to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy received your comments on the November 2018 Draft EA for the proposed NSWC training in which you requested to be a consulting party under Section 106. Unfortunately, your letter was inadvertently misfiled and, once discovered, you were contacted via email/phone and a September 30, 2020 teleconference meeting was arranged to discuss your concerns about effects of the proposed training on historic properties. The notes from that meeting are included as Enclosure 2. The Navy has provided a letter to the Hawaii SHPO summarizing all teleconference meetings and to provide a record of the parties consulted with after the issuance of the May 2020 concurrence under NHPA Section 106. In addition, the Navy will work with responsible state agencies to address HRS Chapter 6E compliance where applicable and Native Hawaiian Organizations' comments may be solicited and considered at that time.

As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers and receipt of rights of entry or other real estate agreements. In addition, only water-based and land-based training is proposed for the Island of Hawaii; no air-based training would occur. Please note the purple area depicted on the maps in the Draft and Final EAs is a study area and is greater in area than the sites where training activities would occur.

Support personnel are described in Section 2.1.2 (Water-Based Training) and Section 2.1.3 (Land-Based Training Activities) of the Final EA. Support personnel include roles such as instructors, oversight, evaluators, medical, and safety lookouts. Support personnel teach and evaluate trainees when training activities are underway, and are responsible for the safety and oversight of trainees participating in the activity. Support personnel also provide emergency response services if needed during a training activity by being present near a training site in an unmarked parked vehicle. Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training). Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

5000-45E
N45
April 2, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin The Environmental Notice on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R.
1229438936

Digitally signed by
ENG.SHERRI.R.1229438936
Date: 2021.04.02 11:45:13
+10'00'

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosures: 1. Undated comment letter from Alapaki Nahale-a.
2. Meeting notes from September 30, 2020 teleconference call between Mr. Nahale-a and NSWC and EA personnel.

Copy to: Hawaii Department of Land and Natural Resources



KAMEHAMEHA SCHOOLS®

Comments on Draft Environmental Assessment
For Naval Special Operations Training Site

PUBLIC COMMENT

By: Alapaki Nahale-a
Kamehameha Schools

Aloha! My name is Alapaki Nahale-a, and I serve as Kamehameha Schools' senior director of regional strategies for Hawai'i Island.

Kamehameha Schools' mission is to fulfill Ke Ali'i Pauahi's desire to improve the capability and wellbeing of Native Hawaiians in perpetuity through education. Education has been the foundation of our organization since our inception, however, equally important has been the responsibility to steward our 'āina (land). It is because of our longstanding commitment to 'āina that we are very concerned with the draft Environmental Assessment for Naval Special Operations Training.

First, we are concerned with the ambiguity related to the properties that will be used. This blanket request for multiple sites rather than a detailed assessment for each site requested, has proved difficult for us to assess the impacts and will certainly result in lower protections of resources. As the EA recognizes, the selected areas consist of a "diverse set of non-federal sites." Recognizing the diversity of sites, it is necessary to have a detailed assessment of each site to ensure proper consideration of different resources and potential impacts. We simply cannot properly assess the impacts, especially on our natural and cultural resources, without having a detailed description of each site that will be used and the way in which it will be used.

We are also deeply concerned with the impact on cultural resources. While the EA purports to address "known burial sites," we are concerned with unknown burial sites and cultural resources. It is common for unknown burial sites to be found on Hawaii's shorelines and we want to make sure that these cultural resources are properly protected and damages are mitigated during use. We recognize that the EA provides that the Navy would comply with Section 106, and other federal and state laws, but we would request a copy of all correspondence regarding section 106 consultation, including correspondence with the State Historic Preservation Division. As a Native Hawaiian organization with specific expertise in natural and cultural resources, we request to participate in the discussions to mitigate the potential impact to historic and cultural properties, including unidentified burials.

Additionally, we are concerned about the lack of clarity around "support personnel" and other details required to implement these exercises. For example, the EA notes, "All land-based training activities would include support personnel . . . responsible for the safety and oversight of trainees participating in the activity." It is unclear the impact of these support personnel, as well as any

1

ENCLOSURE 1



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impacts for ingress and egress of vehicles, personnel, and equipment. Without this information, we do not believe that you can have an accurate assessment of the impacts.

Finally, we are also concerned with notice and access. As we stated previously, there is much ambiguity and we recommend that the process be adopted that requests for use/rights of entry include specific access and use requirements to enable landowners to understand the impacts. Once a right of entry is agreed upon and obtained, we recommend that there be at least two business days of notice for the landowners, as well as other standard provisions, including but not limited to release and indemnity provisions in favor of the landowner. This Notice is important for landowners to ensure that the proper land managers are notified and that landowners can prepare for the use. In some cases, a longer notice period or other special terms or conditions may be appropriate.

We appreciate the opportunity to share our concerns about the draft Environmental Assessment. Founded in 1887, Kamehameha Schools is an organization striving to advance a thriving community where all Native Hawaiians are successful, grounded in traditional values, and leading in the local and global communities. We believe that the health of our people is directly related to the health of our 'āina, and we are committed to supporting healthy 'āina for our people for generations to come.

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING NOTES**

Date: Wednesday, September 30, 2020

Time: 1030-1100 (Hawaii time)

Location: Teleconference

ATTENDEES

<i>NAME*</i>	<i>ORGANIZATION*</i>
A. Nahele-a (AN), Sr. Direction Regional Strategies	Kamehameha Schools, Hawaii Island
S. Wong (SW), Senior Policy Analyst	
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
J. Bigay (JB), PM and NEPA Planner	NAVFAC Pacific
C. Rasmussen (CR), Archaeologist	

Notes: *NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager.

Purpose

The purpose of the call is to follow-up with Mr. Nahele-a regarding our August 12, 2020 teleconference with him addressing his comments on the November 2018 Draft EA for NSO Training in Hawaii. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

JB: welcomed everyone to the call and provided a quick introduction to the attendees (see above table) on the Navy side and their role in the EA process.

AN: We will respond to the EA as written [i.e., the November 2018 public Draft EA] Our position has not changed, if it's not in the written in the EA, we cannot respond to the three sites being verbally conveyed to us in this meeting.

MP: We are focusing on the three areas proposed for training on Hawaii Island. They are Honokohau and Kawaihae Harbors and Mahukona Beach Park, providing we receive permission to utilize these properties. Do you have any suggestions regarding cultural resources?

AN: We are unwilling to share feedback regarding the three sites verbally described as opposed to what is shown in the EA.

SW: We do not actually know that there are actually just three sites, so comments of known or unknown cultural sites is not appropriate. Have you done a cultural assessment?

CR: Section 106 is done and we will be trying to acquire use permits, which will require 6E coverage.

SW: Did 106 specify only three sites?

CR: We covered the proposed training study area, which is much larger than the three sites. We removed National Parks and historic properties from the proposed training areas; we also removed historic trails. We worked with the SHPD to identify historic properties, but also know that there may be other areas of cultural concerns there.

SW: Do you have a more-specific map to share that shows the specific sites?

MP: If we identify specific sites in the EA, it would appear to be pre-decisional and limit our flexibility in choosing a site. Going through the EA process has resulted in the elimination of some areas, reducing the proposed training area. Mahukona Beach Park/Harbor, Honokohau Small Boat Harbor, and Kawaihae Harbor are the three sites we are most interested in.

SW: We are not so much interested in the three sites; our concern is how we get enough information to tell you that there are no cultural resources.

CR: When we get to specific sites that need 6E consultation, then more information goes into the 6E process.

AN: We can't give feedback based on what the Draft EA shows – it is too broad. But if all the activity were limited to the three specific sites, some of our concerns have been alleviated.

MP: Thank you, and thank you for participating in the process. Aloha!

Call ended.

ENCLOSURE 2



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

April Lee (April5@hawaii.rr.com)

Dear April Lee:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The concern about military expansion is outside the scope of the project. However, for clarification and as discussed in the Final Environmental Assessment, Chapter 1, Section 1.1 (Introduction), naval special operations personnel have been training in certain areas of the State of Hawaii for decades. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

Section 3.2 (Land Use - Recreation) of the Final EA has been revised to include discussion of fishing for both recreation and food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 23, 2018 comment letter from April Lee.

Copy to: Hawaii Department of Land and Natural Resources

From: April Lee <April5@hawaii.rr.com>
Sent: Sunday, December 23, 2018 1:58 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Public Comment on Naval Special Operations Training Kohala Coast

Honorable U.S. Naval Special Warfare Command's Navy Special Operations Commander et al,

I was born in Hawai'i on Tripler Army Base into a military family and I still feel deeply that you have plenty of this type of environments on shores and waters of our other Islands to train on. We think that once your military operations get a foothold here, you will only EXPAND your operations over time.

At present this is a PRISTINE coastline ... & we have an intimate relationship with Mother Nature that is imperative to protect ourselves in an emergency. The civil defense administration has told us, if a disaster happens, they will not be here to assist us...we are self-sufficient farmers. In understanding this, we have to protect our ability to get protein...this also includes the right and need to fish off and from our shorelines.

We are ready to take more action, if and when, you think you will continue to violate our right to control our home and important lands. I am fully aware of what has happened & continues happening at Pohakuloa and the impact on much of the area...including the radiation in the neighboring residential area of Waiki'i Ranch.



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Jim Albertini (ja@malu-aina.org)

Dear Jim Albertini:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

Your concern about military expansion is outside the scope of the project. However, for clarification and as discussed in Section 1.1 (Introduction) of the Draft and Final EAs, naval special operations personnel have been training in certain areas of the State of Hawaii for decades. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate requirements prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

The “increase in training” and “size of study area” are not what trigger the need to conduct an Environmental Impact Statement (EIS). An EIS is prepared when an agency determines that a proposed action may significantly affect the quality of the environment. The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules [HAR] Section 11-200-12 and 40 Code of Federal Regulations [CFR] Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the EA, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment; therefore, the preparation of an EIS is not necessary.

Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the

incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the proposed training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA).

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers and receipt of rights of entry or other real estate agreements. In addition, only water-based and land-based training is proposed for the Island of Hawaii; no air-based training would occur. Please note the purple area depicted on the maps in the Draft and Final EAs is a study area and is greater in area than the sites where training activities would occur.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

5000-45E
N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: January 5, 2019 comment letter from Jim Albertini.

Copy to: Hawaii Department of Land and Natural Resources

about:blank

To: Naval Facilities Engineering Command, Pacific
 Attention: Project Manager, EV21.JZ
 258 Makalapa Drive, Ste. 100
 Pearl Harbor, HI 96860-3134
 via email to NFPAC-Receive@navy.mil

Samuel Lemmo
 Office of Conservation and Coastal Lands Administrator
 Dept. of Land and Natural Resources
 State of Hawai'i
 1151 Punchbowl St., Room 131
 Honolulu, HI 96813
 via email to sam.Lemmo@hawaii.gov

Meagan Ostrem
 ManTech International Corporation
 420 Stevens Ave., Suite 300
 Sojona Beach, CA 92075
 via email to Meagan.ostrem@mantech.com

email banned 1/5/19 ? why

cc: Hawai'i public officials, news media, etc.

RE: Draft Environmental Assessment and Finding of No Significant Impact (FONSI) for Naval Special Operations Training in the State of Hawai'i; Various Locations, State of Hawai'i; TMK: Various Locations (Upland and Submerged Lands of the State), published November 8, 2018

Here are my comments dated Jan. 5, 2019 on behalf of our organization for the proposed action titled above.

Your finding of No Significant Impacts is a lie. This massive military intrusion into our coastal nearshore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities. Hawaii is already one of the most militarized places on the planet with more than 100 military installations. The cultural and environmental consequences of these installations along with more than 125 years of illegal US military occupation of Hawaii has been catastrophic. On top of that now the military wants to conduct Special Operations (Special Ops) beyond its military installations. On this basis alone the entire plan for Military Special Ops should be scrapped as military madness beyond the pale.

A specific point to invalidate the Draft EA and require a full EIS is that the draft EA is incomplete and does not cover all the Special Ops that have been planned. I will cite one specific case below involving Navy Special Ops planned for Mauna Kea Recreation Area and the slopes of Mauna Kea that was not included in the Draft EA Special Ops. Given this fact, there is

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reason to believe there may be additional Special Ops also planned for other areas that were also not included in the draft EA Special Ops. Here is the link for the Navy Special Op planned for Mauna Kea Recreational Area.

<https://drive.google.com/file/d/1BctU9aw2rcJQG3YNSM9SrgRGgWBnflV/view?usp=sharing>

This Special Op according to press reports of Nov. 28, 2018 (Hawaii Tribune-Herald and West Hawaii Today front page articles) was cancelled due to community opposition. But this was done after the Draft EA Special Ops was published.

Let's face it. US military Special Ops (that include drone and sniper assassinations) are now desperate attempts on behalf of the US empire to maintain global domination for corporate interests. According to a recently released Brown University study, the U.S. military is now in 80 countries and has spent nearly \$6 TRILLION dollars since 9-11 in this effort. It discusses the disastrous human, social, and economic toll war has on all parties involved. See [Updated Cost of War Data Shows U.S. Military Now in 80 Countries - Peace Science Digest](#)

This Military Madness needs to stop. Let it begin in Hawaii! No Military Special Ops. The US needs to learn Hawaiian Ho'oponopono, a process of healing, making right instead of waging war. The US military needs to begin to Live Aloha – clean up the massive mess it has made in Hawaii – unexploded ordinance, chemical and nuclear contamination, etc. and then demilitarize Hawaii and end its illegal occupation and restore Hawaii as it was – an independent nation of military neutrality.

Jim Albertini, President



Malu 'Aina Center For Non-violent Education & Action P.O. Box 489 Ola'a (Kurtistown) Hawai'i 96760 Phone 808-966-7622 Email ja@malu-aina.org Visit us on the web at www.malu-aina.org

2 of 2

1/6/2019, 9:54 A



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Paige Alisen (paige.alisen@gmail.com)

Dear Paige Alisen:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

Naval Special Warfare Command (NSWC) has done an extensive search for sites within the training study area that meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final Environmental Assessment, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training. There is no proposed use of aircraft, including the MV-22.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. The Navy is not proposing to turn natural spaces into militarized regions. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EA.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather and land/warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and does not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires or infrastructure, or leaving human waste at any training site.

The Navy assessed the potential effect of the proposed training on the Hawaiian Monk Seal. However, as the analysis in the Draft and Final EAs shows, there would be no significant impacts on the Hawaiian monk seal or its critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources.

At the time of the Draft EA, some consultations had begun, and other consultations were planned but had not yet occurred. Consultations have since occurred and are completed with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, Hawaii State Office of Planning for Coastal Zone Management Act compliance, and the State Historic Preservation Officer. Please see Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 28, 2018 comment letter from Paige Alisen.

Copy to: Hawaii Department of Land and Natural Resources

From: Paige Alisen <paige.alisen@gmail.com>
Sent: Thursday, December 27, 2018 3:56 PM
To: NFPAC-Receive
Cc: ja@malu-aina.org; Sarah_Levy@fws.gov; Jason_Holm@fws.gov; Miel_Corbett@fws.gov; Brent_Lawrence@fws.gov; Rylan_Suehisa@fws.gov; Jane_Chorazy@fws.gov; contact@mauisierraclub.org; hawaii.chapter@sierraclub.org; wild@aloha.net; hawaiioffice@hirono.senate.gov; casework@schatz.senate.gov; Tulsioffice@mail.house.gov
Subject: [Non-DoD Source] Strong Opposition to Navy's proposed plan for Ma'alaea Bay

To: Naval Facilities Engineering Command Pacific
 Attention: Project Manager

I am writing to strongly oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui, Hawaii. According to the Navy draft assessment (See [Draft Environmental Assessment for Naval Special Operations Training November 2018](#)) the training will include sonar, active explosives, undersea warfare, missile-to-surface, to air, air-to-air missiles, to name a few.

Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Center, Kihei Canoe Club, Maui Canoe Club, the Mana'olana Pink Paddlers - and the longest uninterrupted white sand beach in our whole state - where endangered turtles nest, and the habitat for monk seals and the endangered humpback whales give birth annually, making this a highly environmentally sensitive and high density area.

The U.S. Naval Special Warfare Command (NSWC) made a Finding of No Significant Impacts (FONSI). This finding is a completely inaccurate. The 2nd page of the abstract tells us all we need to know. The agency that wrote this is the Department of the Navy, with no cooperating outside agencies what so ever, such as the EPA, Dept of Land and Natural Resources, Dept of Fish and Wildlife etc. which should have been consulted extensively because of the environmental impact to three endangered species.

This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities.

The military has miles of uninhabited beaches and lands to conduct their training all over the World. Why you would want to intrude on the public sector and destroy tourism in Hawaii makes no sense and is absurd.

Sincerely,

Paige Alisen, PhD

1536 Halama St.

Kihei, HI 96753

paige.alisen@gmail.com

CC:

1. Malu 'Aina Center for Non-violent Education & Action - ja@malu-aina.org
2. US Fish and Wildlife - Sarah_Levy@fws.gov; Jason_Holm@fws.gov; Miel_Corbett@fws.gov; Brent_Lawrence@fws.gov; Rylan_Suehisa@fws.gov; Rylan_Suehisa@fws.gov; Jane_Chorazy@fws.gov; Jane_Chorazy@fws.gov
3. Sierra Club - contact@mauisierraclub.org; hawaii.chapter@sierraclub.org
4. Hawaii Wildlife Fund - wild@aloha.net
5. Senator Mazie Hirono - hawaiioffice@hirono.senate.gov
6. Senator Brian Schatz - casework@schatz.senate.gov
7. Representative Tulsi Gabbard - Tulsioffice@mail.house.gov
8. Maui News - opinions@themauinews.com
9. Maui Now - editor@mauinow.com; wendy@mauinow.com
10. Hawaii Free Press - Editor@hawaiiexpress.com



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 2, 2021

Representative Nicole E. Lowen
415 S. Beretania St., Rm. 425
Honolulu, HI 96813
replowen@capitol.hawaii.gov

Dear Representative Lowen:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules [HAR] Section 11-200-12 and 40 Code of Federal Regulations [CFR] Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the EA, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

As described in Chapter 2 of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Not all sites within the training study area would be utilized over a 1-year period. Under the Preferred Alternative (Alternative 2), training would occur up to 10 events at an

individual non-federal training site/year (maximum total of events on all non-federal sites would be 330 events) and up to 265 events of training on Federal property per year (see Table 2-4 in the Final EA).

All training activities would be non-invasive in nature and the Navy has no intention or authority to close public beaches. Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

The proposed Naval Special Warfare Command (NSWC) activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention of the trainees to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The purple area depicted on the maps in the Draft and Final EAs is a Study Area. Training is not proposed in ponds, including anchialine ponds. Training would only occur on lands where there is a right of entry or other real estate agreement with a willing property owner or property manager and on military properties identified on the map. Please note that NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations).

The Navy has identified a number of historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. The training study area is larger than the actual area that would be used for the proposed training due to the training's sensitivities and would be limited to smaller sites on federal land, and on state and private lands that have the consent of property owners before training activity occurs.

The Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (HAR Section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today,

from November 8 through November 10, 2018, and once in *The Environmental Notice* on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

On July 23, 2020, in response to your comments on the Draft EA, the Navy provided a draft letter with responses to your comments and enquired whether you had any additional questions. You replied on July 29 that you had no further comments (see Enclosure 2).

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R. Digitally signed by
1229438936 ENG.SHERRI.R.1229438936
Date: 2021.04.02 11:47:24
-10'00'

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosures: 1. January 2, 2018 (*sic*) comment letter from Rep. Nicole E. Lowen.
2. July 29, 2020 email from Rep. Lowen stating she had no additional questions.

Copy to: Hawaii Department of Land and Natural Resources

**REPRESENTATIVE NICOLE LOWEN**HAWAII STATE CAPITOL
HONOLULU, HAWAII 96813

January 2, 2018

Department of Land and Natural Resources
State of Hawaii
Sam Lemmo, Office of Conservation and Coastal Lands
1151 Punchbowl St., Room 131
Honolulu, HI 96813

Aloha,

Thank you for the opportunity to provide comments on the Draft EA for Naval Special Operations Training in Hawaii.

I would like to specifically address concerns relating to proposed activity on Hawaii Island, as I represent a district there and have many concerned constituents who have contacted me about this proposal.

In my reading of the EA, I find that there is not sufficient data provided or analysis conducted to uphold a Finding of No Significant Impact. The coastal areas within the proposed training area include habitat for threatened and endangered species, rare and fragile ecosystems, important archaeological features, and areas used for recreation by residents and visitors. Given the diversity of resources, the size of the proposed training area, and the draft EA's complete lack of specificity regarding exactly where and how many training exercises would be conducted, a thorough analysis of the impacts has not been provided in this document.

For example, the Draft EA does not include assessment of potential impacts to anchialine pools on Hawaii Island's west coast which are home to many rare and endemic species, including the endangered anchialine pool shrimp, which is not addressed in this document. Another oversight is the lack of analysis of how military training exercises would impact recreational activities that regularly occur in the proposed training area, like hiking, camping, fishing, or diving. These are just two examples of how the analysis conducted in this Draft EA is superficial and insufficient.

Furthermore, every Hawaii Island resident I have spoken with about this proposal has indicated that they had no knowledge of it before reading about it in the local newspaper. I, myself, was not aware of it prior to the news story. This is evidence that the public was not adequately consulted during the preparation of this document.

Representative Nicole Lowen • State House District 6 • Kailua-Kona, Holualoa, Kailua
415 S. Beretania St., Rm. 425, Honolulu, HI 96813 • (808)586-8400 • replowen@capitol.hawaii.gov

ENCLOSURE 1



REPRESENTATIVE NICOLE LOWEN
HAWAII STATE CAPITOL
HONOLULU, HAWAII 96813

Given the lack of information, analysis and consultation in the preparation of this document, I support continuing the current, more cautionary and appropriate practice of assessing these training exercise sites individually and determining on a case-by-case basis what the impacts will be and whether they are appropriate.

Thank you for your consideration of these comments,

A handwritten signature in black ink that reads "Nicole E. Lowen".

Representative Nicole E. Lowen
House District 6
Kailua-Kona, Holualoa, Kalaoa

Cc:
Julie M. Zimmerman, Senior NEPA Planner
Meagan Ostrem, ManTeach International Corporation

Representative Nicole Lowen • State House District 6 • Kailua-Kona, Holualoa, Kalaoa
415 S. Beretania St., Rm. 425, Honolulu, HI 96813 • (808)586-8400 • replowen@capitol.hawaii.gov

From: Rep. Nicole Lowen <replowen@capitol.hawaii.gov>
Sent: Wednesday, July 29, 2020 3:16 PM
To: Bigay, John C CIV USN (USA) <john.bigay@navy.mil>
Subject: [Non-DoD Source] RE: FOLLOW-UP REGARDING ENVIRONMENTAL ASSESSMENT for NSO TRAINING IN HAWAII

Aloha,

I have no additional questions at this time.

Mahalo,

Nicole Lowen

Representative Nicole Lowen

Hawaii House of Representatives
District 6: Kailua-Kona, Holualoa, Kalaoa
Chair, Committee on Energy and Environmental Protection
415 S. Beretania Street, Room 425
Honolulu, HI 96813
(808) 586-8400
replowen@capitol.hawaii.gov

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From: Bigay, John C CIV USN (USA)
Sent: Thursday, July 23, 2020 2:31 PM
To: 'replowen@Capitol.hawaii.gov' <replowen@Capitol.hawaii.gov>
Subject: FOLLOW-UP REGARDING ENVIRONMENTAL ASSESSMENT for NSO TRAINING IN HAWAII

Aloha, Representative Lowen,

On January 2, 2018 (sic), you provided comments on the Draft EA for Navy Special Operations Training in Hawaii. In response to your comment letter, the Navy has prepared a draft response letter addressing your concerns and questions (attached, with your letter).

As a follow-up to your comment letter and our draft response, we would like to enquire as to whether you have any questions or additional concerns regarding cultural resources, specifically the Hawaii Revised Statutes (HRS) Chapter 6E process. If so, please let me know by return email or phone, and we can set up a telephone conference call to discuss. If you do not have any additional questions or concerns, please let us know. Please note that the Final EA is scheduled for completion and public release later this year. Thank you.

John Bigay
NEPA Planner
NAVFAC Pacific

ENCLOSURE 2



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

David J. Swatland (dswatland@gmail.com)

Dear David Swatland:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT(EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

The increased training requirement is in accordance with the Naval Special Warfare Command (NSWC) meeting its Title 10 U.S. Code Section 167 mandate as discussed in Section 1.3 (Purpose of and Need for the Proposed Action) in the Draft and Final EAs. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

Chapter 2 (Proposed Action and Alternatives) of the Draft and Final EAs describes the Proposed Action and specifies how it would be implemented. In particular, Section 2.1 describes the proposed training; Tables 2-2, 2-3, 2-4, and 2-5, describe equipment to be used, lay out the regions where the various types of training would occur, and describe the maximum frequency of training. Section 2.5 (Alternatives Development) identifies Alternative 2 as the Preferred Alternative; and Section 2.6 (Best Management Practices and Standard Operating Procedures) describes practices and procedures to avoid, minimize or reduce effects to the environment. Details of implementation as they relate to environmental consequences are further explored in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs. Training would be conducted only after the completion of the NEPA process and rights of entry or other real estate agreements are obtained. The use of specific training sites is contingent on receiving appropriate real estate approvals (Section 2.2).

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules section 11-200-12 and 40 Code of Federal Regulations [CFR] Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft EA, consultations with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and State Historic Preservation Officer, coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly

impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

As described in Chapter 3, all potentially relevant environmental resource areas were initially considered for analysis in the Draft and Final EAs. In compliance with NEPA, Council on Environmental Quality regulations, and 32 CFR Part 775, the discussion of the affected environment (i.e., existing conditions) focuses only on those resource areas potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. Chapter 3 of the Draft and Final EAs presents an analysis of the potential direct and indirect effects with implementation of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA). The activities are similar to those conducted by the general public.

Air quality is analyzed in Section 3.1 of the Draft and Final EAs, and air quality calculations are presented in Appendix B. Transportation vehicles, vessels, aircraft and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on the ambient air quality of the region. In addition, the dispersive nature of the proposed activities would prevent pollutants from concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed the National Ambient Air Quality Standards. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination. Therefore, no significant impacts on air quality would occur with implementation of Alternative 2 (Preferred Alternative).

As stated in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs, trainees would avoid animals in the water, such as Hawaiian monk seals and sea turtles, and would not approach animals resting on the beach. When in the presence of whales, personnel would shut down boat engines in accordance with boating regulations and Navy procedural instruction. Submersibles and small inflatable boats would not bottom out or come ashore in sensitive habitats, such as coral. When training on land, sensitive habitats, such as known bird nesting areas, would be avoided.

The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including the monk seal and its critical habitat. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). Under the Marine Protection, Research, and Sanctuaries Act (16 USC section 1431 et seq.) (also known as the National Marine Sanctuaries Act), the Secretary of Commerce may establish a national marine sanctuary for marine areas with special conservation, recreational, ecological, historical, cultural, archaeological, scientific, educational, or aesthetic qualities. Once a sanctuary is designated, the Secretary of Commerce may authorize activities in the sanctuary only if they can be certified to be consistent with the National Marine Sanctuaries Act and can be carried out within the regulations for the sanctuary. Regulations exist for each sanctuary, and military activities may be authorized within those regulations.

Section 304(d) of the National Marine Sanctuaries Act requires federal agencies to consult with the Office of National Marine Sanctuaries whenever their proposed actions are likely to destroy, cause the loss of, or injure a sanctuary resource. The Hawaiian Islands Humpback Whale National Marine Sanctuary is a single-species managed sanctuary, composed of waters around Maui, Lanai, and Molokai; and smaller areas off the north shore of Kauai, off the Island of Hawaii's west coast, and off the north and southeast coasts of Oahu. All of the proposed naval special operations training activities that would occur within the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final Environmental Impact Statement (EIS)/Management Plan for the Sanctuary, which under the Hawaiian Islands Humpback Whale National Marine Sanctuary regulations do not require permits or further consultation under Section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The proposed training activities addressed in the Draft and Final EAs are the same classes of activities previously analyzed in the Navy's 2013 and 2018 Hawaii-Southern California Training and Testing (HSTT) Final EISs/Overseas EISs and for which the Office of National Marine Sanctuaries found no consultation was required. The activities proposed in this EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 HSTT Final EISs/OEISs and, therefore, consultation is not required.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy has identified a number of historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. The training study area is larger than the actual area that would be used for the proposed training due to the training's sensitivities and would be limited to smaller sites on federal land and on state and private lands that have the consent of property owners before training activity occurs.

Training activities would not interfere with public use of land or water areas for recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 28, 2019 (*sic*) comment letter from David Swatland.

Copy to: Hawaii Department of Land and Natural Resources

David J. Swatland, Esq.
PO Box 1640
Kapa'au, HI 96755
dswatland@gmail.com

December 28, 2019

Naval Facilities Engineering Command Pacific
Attention: Project Manager, EV21.JZ
258 Makapala Drive, Suite 100
Pearl Harbor, HI 96860-3134
NFPAC-Receive@navy.mil

Re: Draft Environmental Assessment (DEA) for Naval Special Operations Training, State of Hawaii.
November 2018

Dear Naval Facilities Engineering Command Pacific,

Please consider this correspondence as public comment on behalf of myself and Margaret Wille regarding the DEA for expanded Navy Special Operations (SpecOps) training in the State of Hawai'i, specifically along Hawai'i Island's Kona and Kohala coasts. As a retired U.S. Coast Guard Captain and the former Deputy and Acting Superintendent of Papahānaumokuākea Marine National Monument, I am quite familiar with reviewing DoD NEPA documents. The Navy's DEA is not in compliance with current National Environmental Policy Act (NEPA) regulations, as outlined below. Beyond the Navy's lack of compliance with NEPA, there are a number of reasons why the Navy's plans for expanded training on the west coast of Hawai'i Island are inappropriate, due to the negative impacts on the area's natural and cultural resources and on the community. This expansion of military training to non-federal lands across the state under the guise of "training scenario variety" is nothing more than a thinly veiled effort to increase the military's already expansive footprint across the Hawaiian Islands. This proposed expansion is unnecessary, bad for the environment and the community, and extremely unpopular with the local population.

A. The Navy's proposed training study areas lie within the boundaries of the Hawaiian Islands Humpback Whale National Marine Sanctuary (HHWNMS) around the islands of Hawai'i, Maui, Moloka'i, Lana'i, and O'ahu. As required by both NEPA (40 CFR § 1501.2 "Applying NEPA early in the process" and 40 CFR § 1501.6 "Cooperating Agencies") and the National Marine Sanctuaries Act (NMSA) [Section 304(d) / 16 USC § 1434(d) "Interagency Cooperation"], the Navy is required to formally consult with the Office of National Marine Sanctuaries (ONMS) at the earliest possible time in the preparation of any NEPA documents. There is no evidence of such consultation in the DEA. It does not list the NMSA in Section 1.6 "Relevant Laws and Regulations", and the DEA only mentions consulting with the U.S. Fish & Wildlife Service (FWS), the National Marine Fisheries Service (NMSF), the State of Hawai'i Office of Coastal Zone Management (OCZM), and the State of Hawai'i Historic Preservation Division (SHPD). Failure to comply with both NEPA and NMSA invalidates the current DEA.

B. The DEA states that a number of resource areas were not addressed in DEA because the potential impacts of the Navy's SpecOps training would be "negligent or non-existent". The fact that the Navy did not even analyze the impacts on water quality or of underwater noise is truly mind-boggling. NEPA requires all federal agencies proposing an action "significantly affecting the quality

of the human environment?" to conduct a detailed analysis of the environmental impacts of the proposed action. How does the Navy know its proposed actions will have negligible or non-existent impacts if it doesn't even analyze them?

- Hawai'i Island's west coast waters are among the cleanest, clearest and most biologically diverse in the state. Especially along the coast from Kawaihae to Mahukona, the lack of development, terrestrial water run-off, and convenient access make this area an incredible treasure of unspoiled habitat. The reefs are vibrant and healthy and full of marine life. This particular coast, along with areas around Maui, is also one of the primary breeding areas for humpback whales, who are often seen within yards of the shoreline. This coastline exists like this because of State and local government and community efforts to keep it this way, a task becoming ever more difficult against the pressures of continued development and the impacts of global climate change. Hawai'i Island coral reefs have seen several bleaching incidents in recent years due to increased ocean temperatures; it's critical that stressors on the marine environment be kept to a minimum in an effort to minimize future bleaching events.
- Though the Navy continues to discount the impacts of underwater noise on marine life, especially marine mammals, valid scientific studies have consistently documented the harmful effects of anthropogenic noise on marine animals, including alternations in behavior and permanent or temporary hearing loss, which likely have contributed to the many mass stranding events in recent years. Bringing more underwater noise to the one of the primary humpback whale breeding grounds, and where spinner dolphins, the endangered Hawaiian false killer whale, and the critically endangered Hawaiian monk seal live, is just not a positive development for these species.
- Contrary to the information provided in the DEA, critically endangered Hawaiian monk seals do often inhabit the shallow waters of the proposed training areas as they access the shoreline. The Big Island's Kohala coastline has many popular haul-out locations for the monk seal due to the inaccessibility of much of the coastline to human activity.

A significant increase in Navy training operations in these areas will only have negative impacts on the marine environment, both in the short term and cumulatively.

C. The Navy's Best Management Practices (BMP) for Naval SpecOps training in Table 2.6 state that "If marine mammals or ESA-listed marine species are noticed within 50 yds. (45.7 m) of the training activities, training may continue only if, in the best judgment of the marine species observer, the activity would not affect the animal(s)." This practice is direct conflict with IIIIWNMS regulations requiring everyone to always remain 100 yards away from humpback whales. In addition, the BMPs for air-based training activities in Table 2.6 fail to mention both the ESA and IIIIWNMS regulations requiring aircraft to remain at least 1,000 ft from humpback whales at all times.

D. The DEA's analysis of potential impacts to cultural resources is woefully inadequate with regards to Hawai'i Island. The document makes absolutely no mention of the Ala Kahakai Trail, designated in 2000 and administered by the National Park Service (NPS) for the preservation, protection, and interpretation of traditional Native Hawaiian culture and natural resources. The Trail, a recent addition to the National Historic Trails program, runs right through the entirety of both proposed training areas on Hawai'i Island's west coast. Aside from Lapakahi State Historical Park, the DEA also fails to mention the hundreds of Native Hawaiian cultural sites along the South and North Kohala coast. Just because a location is not on a federal or state list of 'historical sites' does not mean a place lacks profound and lasting cultural value to the local population. The DEA also ignores the rich terrestrial and sub-marine history of Mahukona in North Kohala, the terminus for the

sugar cane train and loading port for vessels transporting the sugar cane around the state. The waters around Mahukona, in addition to being rich with coral reefs and marine life, are also home to a trove of historical artifacts from the sugar cane era. The Kohala coastline is also home to numerous hiking trails and ocean access points used daily by locals and tourists alike. Mahukona is a primary access location for swimmers, snorkelers, paddlers, etc., and is a popular community gathering place most every day of the week.

E. In addition to ignoring most of the important historical and cultural resources along Kona and Kohala coastlines, the DEA completely fails to address the impacts of the presence of Navy personnel, aircraft, vehicles, vessels, etc. on Native Hawaiian culture, and on the community. Native Hawaiian culture and traditional practices are based on ancestral connections that comprise a sense of place and identity; a place can have sacred significance even if there are no structures or monuments there. Part of that sense of place is experiencing and observing the environment as their ancestors have for generations, something the deep historical roots of Hawai'i Island's west coast provide in abundance. Since the 1970s, Hawaiian culture has undergone a revival, with examples such as Hawaiian language revitalization, expeditions on traditional voyaging canoes, inter-tidal zone monitoring, experiential research during solstice & equinox events, Hawaiian language immersion expeditions, at sea education & culture programs, and the documentation & assessment of cultural sites throughout the islands. The presence of Navy assets during any of these activities would likely be disruptive; actual operations (aircraft low passes, beach landings, vehicle movements, etc.) would certainly be disruptive. Many people who venture along the west coast of Hawai'i Island for research, educational, recreational, etc. activities are also approaching their activities with a cultural mindset: conducting protocols that include chanting upon entering and leaving a place, or before and after doing something; observing not just what is right in front of them but what is all around them. We know this can be difficult concept for the military to grasp but saying there is no impact on cultural resources or practices just because the Navy training "would not restrict the ability of individuals to use or access sites" is short-sighted and completely misses the bigger picture of Hawaiian culture and its relationship to the environment.

F. The DEA frequently ignores the impacts of global climate change in analyzing the impact of Navy operations on Hawaii's environment. While the region's northeast tradewinds used to keep the state's air relatively clean by carrying away locally generated contaminants, a 2012 University of Hawai'i study showed that the number of tradewind days in the state has decreased almost 30% in the past four decades, resulting in a significant increase in hot, humid, low wind weather and a decrease in air quality, especially due to 'vog' emitted by Hawai'i Island volcanic activity. As long time residents of the Big Island, we can attest to the change in weather patterns that the Navy ignores. The "consistent trade winds" the Navy seems to be relying on to "efficiently carry away air contaminants" and "promote effective dispersal" are no longer consistent and should not be part of the Navy's 'plan' to deal with air pollution its exercise produce.

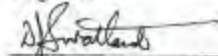
G. NEPA requires the Navy to justify why it needs to conduct a proposed action in a certain place, as opposed to a different place. The DEA's claim that the Navy cannot provide combat ready forces under 10 U.S.C. § 167 due to lack of 'training scenario variety' unless it conducts training on the Big Island's west coast is without merit. The U.S. government is the second largest land owner in the State of Hawai'i; the federal footprint covers over 500,000 acres or almost 13% of the State's land. Nothing in the DEA justifies why the Navy cannot conduct diverse and productive training at anyone of the huge military bases in the State (JBP III, Marine Corps Base Kaneohe, PMRF, Pohakula Training Center, Schofield Barracks, etc.), or for that matter, at any of the national parks in

the state, instead of on a relatively undisturbed stretch of coastline rich in natural and cultural resources and treasured by the local community and tourists (the driver of the State's economy) alike.

H. Finally, and related to F. above, conducting training operations at remote locations along Hawai'i Island's west coast also conflicts with the "Training Area Screening Factors" outlined in Section 2.4 of the DEA. The proposed training areas do not have ready access to "multiple military medical facilities" or even a "broad availability of on-call medical facilities". Nor is there ready access to lodging, maintenance support, or the logistical needs to support the "unique training and operational requirements for naval special operations personnel" where the "proximity of secured Navy facilities/installations is critical."

In summary, the Navy's DEA does not comply – in multiple ways – with NEPA requirements to examine the potential impacts of the proposed action. In addition, conducting Navy SpecOps training in an area of significant natural and cultural resources treasured by the community when there are other more appropriate locations is just plain wrong. These cultural resources are sacred and revered by visitors from around the state and the mainland, as well as attracting international visitors, important not only on a socio-cultural basis but also on a socio-economic basis. Both Margaret and I live on or near the Kohala coastline, and like many others in the community and many tourists on the Big Island, we visit the proposed Navy training areas on a regular basis to experience the natural beauty, the incredible diversity of natural and cultural resources, and the joy of being someplace less impacted by humans. Navy training will disrupt these activities for everyone and will forever alter the unique land- and sea-scape of Hawai'i Island. We recommend that the Navy consider drafting an Environmental Impact Statement (EIS), as a properly drafted EA for the proposed actions cannot possibly result in a Finding of No Significant Impact (FONSI). Failure to conduct the appropriate NEPA analysis and/or reduce the number of non-federal training locations will most certainly result in legal action against the Navy.

Regards,



David J. Swatland, Esq.
Captain, U.S. Coast Guard (Ret.)



Margaret Wille, Esq.



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Lori Buchanan (molokailori@gmail.com)

Dear Lori Buchanan:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Table 5-1 (Principal Federal and State Laws Applicable to the proposed action) in Section 5.1 (Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions), has been revised to provide a summary of the compliance status for applicable laws and regulations, including Hawaii Revised Statutes (HRS) Chapter 343, HRS Chapter 195D, HRS Chapter 6E, Hawaii Administrative Rules (HAR) Chapter 11-200, and HAR Chapter 13-124. Site-specific real estate agreements would be obtained prior to conducting training in areas where consent is needed. The proposed action does not include the leasing of submerged lands; thus Chapter 190-D is not applicable. The proposed action does not include activities triggering HRS 183D-1-66.

All training would be conducted in accordance with natural resource management plans applicable to the landownership: for the Navy-owned lands, Integrated Natural Resource Management Plans would be followed; for State or County lands, management plans would be followed; and private lands would be subject to right of entry permits, or other real estate agreements. The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a study area for purposes of analysis and is greater in area than the sites where training activities would occur.

Please note that Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site

conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places, including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Proposed Action is consistent with HRS Chapter 6E as the Navy has completed NHPA Section 106 consultation with the SHPO and key stakeholders and followed the governing procedures to the maximum extent practicable. The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Consultation has also been completed with the State of Hawaii Office of Planning for Coastal Zone Management Act compliance. Please see Appendix A (Agency Correspondence) of the Final EA for associated correspondence and consultation documents.

NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, *The Environmental Notice*, on November 8, 2018. The notice described the proposed action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). Following receipt of

comment period extension requests, the Navy extended the public comment period for 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. The Draft EA was made available online and copies were placed in public libraries. The Notice of Availability also included a solicitation for individuals or organizations interested in participating in the NHPA Section 106 process: "Concurrent with the National Environmental Policy Act (NEPA) process, the Navy is conducting National Historic Preservation Act Section 106 consultations regarding potential effects of the Proposed Action on historic properties. NSWC has determined that the naval special operations training is considered an undertaking as defined in the National Historic Preservation Act 36 CFR §800.16(y) and has the potential to cause effects on historic properties. Pursuant to 36 CFR §800.2(d), 800.3(b), and 800.3(e), the Navy is soliciting members of the Public who wish to participate as consulting parties in the National Historic Preservation Act Section 106 process associated with this Undertaking. If interested in participating, provide written notification at the email or physical addresses below within 30 days of this notice."

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Lori Buchanan.

Copy to: Hawaii Department of Land and Natural Resources

From: Lori Buchanan [mailto:molokailori@gmail.com]
Sent: Monday, January 07, 2019 9:49 PM
To: sam.j.lemmo@hawaii.gov; NFPAC-Receive@navy.mil; Ostrem, Meagan K.
<Meagan.Ostrem@ManTech.com>; Suzanne.Case@hawaii.gov; Lori Buchanan
<molokailori@gmail.com>
Cc: Malia Akutagawa <maliaaku@hawaii.edu>
Subject: Comments for Navy Special Ops Training

Dear DLNR and Navy,

Apologies, attachment not sent in prior email. Attached please find comments in response to the Navy's Environmental Assessment Naval Special Operations Hawaii.

I want you to know that my beloved cousin Melody Fukuoka's cremated remains were placed in the near shore waters of Pala'au where the Navy and all other branches of the military is proposing to conduct military training. Auwe..... Many in my community have also placed their loved ones ashes in the same area because that area is so very special to us and it is where we get our food. The mere thought of military training in our waters and on our lands of our south shore is so disrespectful it brings me to tears. Military training on Molokai will hurt us immensely, please don't do it, we will suffer.

Lori Buchanan
Molokai Aha Kiole Member

From: Lori Buchanan
Molokai Aha Kiole, Pala'au Moku
P.O. Box 133
Hoolehua, Hawaii 96729
(808) 336-0625 mobile

January 7, 2019

Approving Agency:
Department of Land and Natural Resources, State of Hawai'i
Samuel Lemmo, Office of Conservation and Coastal Lands Administrator
Kalanimoku Building, 1151 Punchbowl St, Room 131
Honolulu, HI 96813
sam.j.lemmo@hawaii.gov
Copy to: alex.j.roy@hawaii.gov

Applicant:
U.S. Naval Special Warfare Command
Julie M. Zimmerman, Senior NEPA Planner (EV21)
Naval Facilities Engineering Command, Pacific
258 Makalapa Drive, Ste 100
Pearl Harbor, HI 96860-3134
NFPAC-Receive@navy.mil

Consultant:
ManTech International Corporation
420 Stevens Ave., Suite 300
Solana Beach, CA 92075
Attention: Meagan Ostrem
Meagan.ostrem@mantech.com

Submitted via email (Comments due January 7, 2019)

Re: Naval Special Operations Training Hawai'i

HRS Chapter 343 Triggers:

- (1) Propose the use of state or county lands or the use of state or county funds
- (3) Propose any use within a shoreline area

Dear Mr. Lemmo and Ms. Zimmerman,

My name is Lori Buchanan and I am a member of the Aha Kiole of Molokai and I am a Po'o for Pala'au Moku which is in the APE. We are part of the Aha Moku System and serve as an advisory to the Department of Land and Natural Resources. We have a stated purpose to protect our natural resources, aina. We have expertise in aspects of historic preservation that are significant to Native Hawaiians. Multiple members of our Aha exceed the Secretary of Interior's Professional Qualification Standards as set forth in 36 C.F.R. Part 61.

We want to be excluded out of the Navy's proposal/EA to use Molokai for training. We are also seeking immediate inclusion as a consulting party to the aforementioned undertaking and/or any subsequent undertakings related to this activity and/or any future undertakings within the area of potential effect or adjacent properties.

To this end, we would like to be included in all future communication related to the Section 106 process and copies of all past records and communications of the Section 106 to date. I, Lori Buchanan, will serve as Pala'au Moku's representative to these consultations.

We have very serious concerns that this project violates the National Historic Preservation Act (NHPA) 54 U.S.C. 306108, as amended, and its implementing regulations, 36 C.F.R. Part 800, as amended. I also believe violations of Hawai'i Revised Statutes (HRS) Chapter 6E are being proposed and raise serious objection to the Navy's proposed activities. **We believe Chapter 6E applies due to the activities occurring on state lands and the HEPA DEA contains no documentation whatsoever regarding its compliance with HRS Chapter 6E and Act 50 (2000), both of which are required before the environmental assessment can be accepted by the State of Hawai'i.**

The Draft Environmental Assessment also fails to include Chapter 6E approval on its list of permits and approvals required. It also fails to list that a CDUP (Conservation District Use Permit) or similar approval would be required from the Department of Land and Natural Resources. The Assessment also fails to acknowledge that part of its activities will take place with the Hawaiian Islands Humpback Whale National Marine Sanctuary, and as such, approval from that authority is required.

We can find no authority that preempts these actions from state or local law. Since we do not believe the Navy is preempted from applicable state and local laws we believe the Navy is subject to comply with chapter 190-D the use of submerged lands in the proposed APE. Federal preemption may occur in one of three ways: (1) the federal law expressly preempts state or local laws; (2) the federal law impliedly preempts a state or local law by occupying an entire field of regulation, so that no room is left for state regulation; or (3) state law is preempted to the extent it actually conflicts with federal law because compliance with both state and federal law is impossible, or when a state law stands as an impediment to a federal purpose. *Rum Creek Coal Sales, Inc. v. Caperton*, 971 F.2d 1148 (4th Cir. 1992). We challenge the Navy to demonstrate how it is preempted from applicable state and local laws or alternatively resubmit a Draft Environmental Assessment that accurately identifies all applicable state permits and approvals required for the action to go forward and provide sufficient information in the draft as to comply with such laws. HAR §11-200-10(11) requires the assessment to include "all known or anticipated discretionary permits and approvals, as well as ministerial permits and approvals, for the proposed action. Since we do not believe the Navy is preempted from applicable state and local laws we believe the Navy is subject to pay the state a fee(s) for the use of submerged lands in the proposed APE, chapter 190D This list should include all state, county, and federal approvals." The draft cannot simultaneously list the following legislative authorities but then fail to list the permits and approvals required under these authorities.

- Hawaii Revised Statutes, section 6E-8
- Hawaii Revised Statutes, sections 183D-1-66
- Hawaii Administrative Rule, Chapter 13-124, Exhibit 2 and Hawaii Revised Statutes, section 195D

Summary of Proposed Action:

The United States (U.S.) Naval Special Warfare Command is the U.S. Navy's special operations force and maritime component of the U.S. Special Operations Command. The Naval Special Warfare Command has prepared this Environmental Assessment in accordance with the National Environmental Policy Act (as implemented by Council on Environmental Quality and Navy regulations) and Hawai'i Revised Statutes, Chapter 343. The Proposed Action supports small unit intermediate and advanced land, maritime, and air-based training activities for naval special operations personnel. Training would occur in the nearshore waters and land-based areas on O'ahu, Island of Hawai'i, and Kaua'i, and in nearshore waters (including harbors and bays) of Maui, Moloka'i, and Lāna'i.

Insufficient 36 C.F.R. Part 800 (Section 106) and HRS Chapter 6E Compliance

We find that the plan and corresponding environmental assessment fail to adequately to meet the well-established requirements of both Section 106 and HRS Chapter 6E. The plan also fails to meet the standards of an adequate environmental assessment document provided in the corresponding Hawaii Administrative Rules.

Failure to Meet HEPA and NHPA Standards

Page ES-ii of the draft states, "Consultation under Section 106 of the National Historic Preservation Act (NHPA) is in progress with SHPD to assess the effects of the proposed action on historic properties. The Section 106 consultation includes coordination with Native Hawaiian organizations." Under HAR §11-200-10(12) copies of the written correspondence from this early consultation is to be included in the draft. It was not provided. Additionally, beyond this vague reference to Native Hawaiian organizations, there is no indication that consultation with Native Hawaiian organizations has actually taken place.

As early consultation is encouraged under HAR §11-200-10(3) and required under both NHPA and HRS Chapter 6E, we feel the document fails to meet the standard established under the applicable administrative rules. There are a significant number of organizations with a cultural or religious interests in historic properties that would be impacted by the proposed action. We would be happy to provide this list to the Navy during a proper consultation process. Therefore, please consider this notice that we would like to reserve the right of organizations that have not be consulted through NIIPA to comment on the proposed action. We feel that failure to meet this standard and allow for this consultation would result in violation(s) of NHPA and potentially HRS Chapter 6E.

Failure to Meet NHPA Standards

The Assessment states the following: "Consultation under the NHPA Section 106 is in progress with SHPD to assess the effects of the proposed action on historic properties. The Navy does not

anticipate any adverse effects to historic properties in accordance with the Section 106 Implementing Regulations.” This appears to contradict the aforementioned statement in the draft which identifies consultation with Native Hawaiian organization. 36 C.F.R. 800.3 states: “The agency official shall make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties. Such Indian tribe or Native Hawaiian organization that requests in writing to be a consulting party shall be one.” As mentioned above, **there is no documentation in the draft that shows any effort, let alone a reasonable and good faith one, was made to identify NHOs that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties.**

The draft also fails to adequately comply with 36 C.F.R. 800.4, which calls for thorough identification efforts. The draft states the following: “the DoD has conducted inventories of cultural resources at the SHPD for areas outside of DoD lands and at all installations, including Marine Corp Base Hawaii, JBPHH Region, Barber’s Point and Kahuku Training Area on Oahu; and the PMRF on Kauai, to identify historic properties that are listed or potentially eligible for listing in the NRHP.

These inventories have not been made available in the assessment, therefore, they are not available for the public or Native Hawaiian Organization to review.

The documentation in the draft fails to meet the Secretary of Interior’s Standards for Identification.

Determine scope of identification efforts. In consultation with the SHPO/THPO, the agency official shall:

- (1) Determine and document the area of potential effects, as defined in § 800.16(d);
- (2) Review existing information on historic properties within the area of potential effects, including any data concerning possible historic properties not yet identified;
- (3) Seek information, as appropriate, from consulting parties, and other individuals and organizations likely to have knowledge of, or concerns with, historic properties in the area, and identify issues relating to the undertaking’s potential effects on historic properties; and
- (4) Gather information from any Indian tribe or Native Hawaiian organization identified pursuant to § 800.3(f) to assist in identifying properties, including those located off tribal lands, which may be of religious and cultural significance to them and may be eligible for the National Register, recognizing that an Indian tribe or Native Hawaiian organization may be reluctant to divulge specific information regarding the location, nature, and activities associated with such sites.

The agency official should address concerns raised about confidentiality pursuant to § 800.11(c).

(b) Identify historic properties. Based on the information gathered under paragraph (a) of this section, and in consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might attach religious and cultural significance to properties within the area of potential effects, the agency official shall take the steps necessary to identify historic properties within the area of potential effects.

(1) Level of effort. The agency official shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey. The agency official shall take into account past planning, research and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects. The Secretary's Standards and Guidelines for Identification provide guidance on this subject. The agency official should also consider other applicable professional, State, tribal and local laws, standards and guidelines. The agency official shall take into account any confidentiality concerns raised by Indian tribes or Native Hawaiian organizations during the identification process.

Integrating Identification Results

The results of identification efforts must be integrated into the planning process so that planning decisions are based on the best available information. The new information is first assessed against the objectives of the identification efforts to determine whether the gathered information meets the defined identification goals for the historic context(s); then the goals are adjusted accordingly. In addition, the historic context narrative, the definition of property types and the planning goals for evaluation and treatment are all adjusted as necessary to accommodate the new data.

Reporting Identification Results

Reporting of the results of identification activities should begin with the statement of objectives prepared before undertaking the survey. The report should respond to each of the major points documenting: Objectives; Area researched or surveyed; Research design or statement of objectives; Methods used, including the intensity of coverage. If the methods differ from those outlined in the statement of objectives, the reasons should be explained. Results: how the results met the objectives; result analysis, implications and recommendations; where the compiled information is located.

A summary of the survey results should be available for examination and distribution. Identified properties should then be evaluated for possible inclusion in appropriate inventories. Protection of information about archeological sites or other properties that may be threatened by dissemination of that information is necessary. These may include fragile archeological properties such as religious sites, structures, or objects, whose cultural value would be compromised by public knowledge of the property's location.

- 1) The identification effort was inadequate. The draft states, "The Navy reviewed existing information on historic properties within the APE from the SHPD, from the DoD cultural resources reports, and from the National Park Service's Focus digital library. This review resulted in the identification of 852 historic properties (listed and eligible) in the APE: 580 from Oahu, 182 from Hawaii Island, 80 from Kauai, 0 from Lanai, 4 from Maui, and 6 from Molokai. Although these historic properties are within the APE, the majority will not be utilized for training. These traditional and historic resources are located in the waters and on the shores of the Hawaiian Islands, many of which have not been evaluated for National Register eligibility. However, they will be treated as eligible for consultation

purposes. The Navy also reviewed the inventory of properties listed in the NRHP through the National Park Service's Focus digital library and found 33 listed properties in the APE: 5 National Historic Landmarks (NHILs), 6 historic districts, 14 buildings and structures, 2 historic objections, and 6 archaeological sites." The draft fails to identify the 852 historic properties in the APE denying the public the opportunity to review the identification effort for accuracy.

- 2) We also feel the results are inaccurate. Since the Navy failed to identify any consulting parties or NHOs beyond SHPD, we feel it is not an accurate assessment, which was determined from the failure to completely acknowledge any sites on Lānaʻi. The Assessment is short-sighted in its characterization of properties. The Assessment states: "Cultural resources that are listed in the NRHP or determined eligible for listing in the NRHP are "historic properties" as defined by the NHPA." The definition provided under 36 C.F.R. 800.16, which reads: "(1)(1) Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria."

Failure to Adequately Consider Traditional Cultural Properties

Traditional Cultural Properties are defined by the U.S. Department of the Interior National Parks Service American Indian Liaison Office as "a property that is eligible for inclusion in the NRHP based on its associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community" (U.S. Department of the Interior, 2012). No Traditional Cultural Properties have been identified in the APE on Molokai, Oʻahu or Hawaiʻi Island. We feel this is an absurd conclusion and a demonstration of the inadequacy of the document. First, it is premature to have reached such a conclusion when consultation has been non-existent and/or inadequate thus far. Second, Bulletin 38 (NPS) encourages the use of experts with proper knowledge of culture and ethnography to conduct work on TCPs. There is no indicator that this project team has any such expertise with Native Hawaiians or Hawaiian cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions. The coastlines included in the APE are literally riddled with historic fishponds and other historic sites that have been summarily excluded from this study's consideration. We exert we have Konohiki fishing rights chapter 187A, 190-24, in the proposed APE and that the state shall not abridge or alter, sublease for marine activities, any conflicts that impair Konohiki fishing rights without further, proper and adequate identification and assessment as required under the law, this project should absolutely not be allowed to proceed and we request that the Navy not conduct or propose to conduct any training on Molokai or in our near shore waters and submerged lands. The draft notes that:

Studies at the PMRF Barking Sands in the APE on Kauaʻi have identified one traditional cultural property (U.S. Department of the Navy, 2014). This traditional cultural property, called Nohili Dunes, includes Elekuna Heiau, an ancient burial ground, and habitation sites. The legend of Nohili Dunes identifies a fisherman who went out to sea, tying his nine dogs to three stakes before he left. When he returned home, exhausted after battling

heavy seas, he forgot to untie his dogs. In the morning, the dogs had disappeared, but three mounds of sand remained and, upon each step on the sand, he heard a low bark. He dug for the dogs, but this only generated more “barking” sands, and he continued to hear the barks daily as he crossed the beach. For this reason, the Nohili Dunes are known as Barking Sands (Dlendorf, 2013). This traditional cultural property is eligible for listing on the NRHP.

There are numerous other sites deserving of equal consideration and review. The arbitrary review of only a single site fails to meet the threshold standard of adequate NHPA review and compliance.

The study also makes the shocking statement: “Traditional Cultural Properties are generally found on land and therefore are not found in the APE on Maui, Molokai, or Lanai.” This is fundamentally untrue. There is an entire discourse emerging around maritime cultural properties and maritime cultural landscapes. The NPS has even held symposia on this topic. Again, we find the Navy’s inability to recognize that Hawaiians, as ocean-faring people, would have numerous properties that meet the criteria of both the NRHP and TCPs a demonstration of the pedestrian, inadequate, and amateur nature of this document.

Failure to Provide Adequate Information to Assess Impacts Under State Law

As the Navy’s activities are taking place in state laws, HRS 183 and 195D both apply. We feel that the draft fails to provide adequate data and analyses of how it complies with these laws.

Protection of information about archeological sites or other properties that may be threatened by dissemination of that information is necessary. These may include fragile archeological properties or properties such as religious sites, structures, or objects, whose cultural value would be compromised by public knowledge of the property’s location.

As mentioned above, we feel this assessment fails to adequately:

- 1) Determine and document the area of potential effect;
- 2) Review existing information on historic properties within the APE;
- 3) Seek information from consulting parties and knowledgeable parties regarding historic properties in the area and identify issues relating to the undertaking’s potential effects on historic properties; and
- 4) Gather information from NHOs like ours.

The plan further fails to identify historic properties and sufficiently evaluate them for historic significance. Most critically, the plan and assessment categorically adequate conduct the effects assessment required under applicable law.

It is our strong position that this proposed alternative will have a significant adverse effect on historic properties within the APE. We feel, specifically, that the proposal will directly and indirectly alter the characteristics of historic properties qualified for the National Register in a manner that would diminish the integrity of the properties’ location, setting, feeling, and association. Tourism has been known to significantly and adversely impact areas across Hawai’i and, specifically, Moloka’i. The Navy proposal will change the character of the property’s use within the property’s setting that contributes to its historic significance. Additionally, we believe

additional activities related to this proposal will introduce visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features.

We are unaware of any provision in the National Historic Preservation Act that preempts state or local laws. Therefore, HRS Chapter 6E and Chapter 183 should apply to this action insofar as the activities are taking place on state lands and in state waters, particularly coastal waters.

We request Molokai be taken out of the proposed Navy EA. We request immediately inclusion into and initiation of a Section 106 process that adequately complies with the NHPA and Chapter 6E. We would like an acknowledgement of the adverse effects and subsequently we would like a consultation process that moves towards the development of a MOA or PA.

We urge the SHPO not to approve or concur with any proposed decision, determination, or finding until proper consultation and compliance with Section 106 takes place.

Thank you for your prompt consideration of our consideration and your immediate response to our request as inclusion as a consulting party to this undertaking.

Respectfully submitted,

Lori Buchanan
Po'o, Pala'au Moku
Molokai Aha Kiole
(808) 336-0625 mobile



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
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5000-45E
N45
April 12, 2021

Cory Harden, Sierra Club
333cory@gmail.com

Dear Cory Harden:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Proposed Action is in accordance with the Naval Special Warfare Command (NSWC) meeting its Title 10 U.S. Code Section 167 mandate as discussed in Section 1.3 (Purpose of and Need for the Proposed Action) in the Draft and Final EAs. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. During the development of the alternatives, NSWC considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

NSWC will also conduct training in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, *Navy Safety and Occupational Health Program Manual* (2011). See Section 2.6 (Best Management Practices and Standard Operating Procedures). Training activities would be consistent with management objectives of individual sites, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area. Training would be conducted only after the completion of the NEPA process and rights of entry or other real estate agreements are obtained. Training would only occur on lands where there is a right of entry or other real estate agreement with a willing property owner or property manager and on military properties identified on the map (see Section 2.2 of the Draft and Final EAs).

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was

specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. A critical factor of this type of training is navigating the “unknown” when completing a training objective. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees’ skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

There is no active training operation for the public to see. The trainees learn skills needed to avoid detection. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and

consistent with the existing land use. Training would not restrict recreational activities within the training study areas.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

Ground transportation support is discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training). Ground transportation support vehicles that may be used include a

passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation. Public roadways would not be blocked at any time.

For responses to comments by Mike Reimer, please refer to Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs; consultations with the USFWS, NMFS, Hawaii Office of Planning, Coastal Zone Management Program, and Hawaii SHPO; coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Cory Harden, Sierra Club.

Copy to: Hawaii Department of Land and Natural Resources

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January 7, 2019

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via e-mail from 333cory@gmail.com to NFPAC-Receive@navy.mil

Dear Navy staff,

Here are our comments on the Draft Environmental Assessment for Naval Special Operations Training, State of Hawai'i, November 2018. Thank you for considering them.

Sincerely,

Cory Harden
808-959-7747

comments on Draft Environmental Assessment for Naval Special Operations Training, State of Hawai'i,
November 2018
from Sierra Club, Moku Loa group

Summary

We urge the Navy to do this training elsewhere.

The people of Hawai'i already bear the impacts of thousands of acres of military bases. This action would add to impacts on quality of life, may affect the livelihoods of fishers and of workers who depend on tourism, and may lower property values. It would also impact a number of endangered species and may impact shorelines.

The DEA should analyze the psychological and cultural impacts from military training activities popping up unexpectedly and repeatedly in areas where civilians are expecting beauty, quiet, connection with native Hawaiian culture, and opportunities for recreation.

The DEA should address how civilian-military conflicts will be resolved, how informed public consent will be achieved, and what will happen if property owners refuse to allow training.

The DEA should evaluate alternate locations, to avoid the fate of the Stryker project, which was delayed for failing to do that.

The DEA should specify how many years the training will continue, and how long the DEA will be valid.

Consultations with agencies should be completed, and the information incorporated into the DEA. Contradictions should be corrected. Then the DEA should be sent out again for comments.

Personnel involved in Navy training should receive training in recognizing Hawaiian cultural sites.

The DEA should address how will trainees arriving in public spaces by aircraft or boat will avoid detection, and how trainees will avoid leaving footprints and other traces on beaches.

General Comments

Our comments focus on Hawai'i Island impacts.

The DEA should specify for how many years the training will continue, and how long the DEA is valid.

With military training intruding on civilian areas, who will have priority, and who will have the authority to decide, when incidents suddenly arise in remote areas where civilian needs conflict with military training needs?

The DEA should address concerns raised in these comments by Mike Reimer, retired geologist and former Kona resident.

¹⁰There is no question that this proposed training, particularly the stealth options, intentionally involves members of the public. The training includes not only individuals who are learning techniques, specifically the trainees, but the observers to evaluate the process and to provide safety options for the public, such as that described in section 3.6.3.2. However, the EA completely overlooks the necessity of full disclosure to the public of its participation. At a minimum, there should be an entire section in the EA devoted to notification procedures, not only to local authorities but to the public of when the training activities will be and are continuing. This alert to the public may help avoid some otherwise dangerous situations.

¹¹When the public is involved as part of the training program, it should not be as unwitting participants. Although it is unfortunately not discussed in this EA but should be, as the training is to be among civilians, there will be some noticeable reaction of the civilians providing a basis

fortypical research-oriented observation into their behavior. This is confirmed by the acknowledgement that the military observers and safety support staff will be present (Table 2-6) and anticipating this civilian interaction and reaction in order to make possible interventions about the training progress (sec 1.1, p. 1-2). The civilians are therefore human subjects involved in the training exercises and the EA must discuss this involvement and how it is addressed; but the EA neglected to do so.

"The notification actions required are covered under what is referred to as the "common rule" and involvement and requirements are covered by declarations, agreements, and regulations on international and national levels to which the U.S. is a participant. These include the Nuremberg Code of 1947, the Helsinki Declaration of 1964 (rev. 1975, 2002), and the Belmont Report published in 1979, and the Cold War Era Human Subject Experimentation Congressional Hearings of 1994. The ethical principles regarding respect, beneficence, and justice must be applied. Above all, the voluntary consent of the human subject for participation is absolutely essential. Interestingly, the development of these principles is repeatedly inferred by the Nuremberg Code in which a claim of national security is not given an automatic exemption. In fact, the EA does not provide any information on if a waiver was implemented nor does it address responsibilities as required by 32CFR219 for this publically declared, non-classified training program. In addition, lack of a specific informed consent document cannot be considered as giving consent and anyone can withdraw or decline from participation even after consent is given (32CFR219(a)(8)).

"The issue of informed consent is not a trivial matter. Because this training involves the public, certain steps must be taken to make the public aware of their participation. The individuals must be given sufficient information on the procedures, purposes, risk and benefits, alternative procedures, the opportunity to ask questions, and to have the agency responsible for the project identified. Ambiguity should be avoided and the probability and magnitude of risks presented. Clearly, for children, there must be a responsible parent or guardian to give consent. The EA acknowledges the Navy is aware that the areas proposed for training include lands used for public recreation (Sec. 3.2) so it is not incidental public contact that is engaged in this training program but intentional and planned contact that is actually part of the program.

"The EA states that there is no need for involvement by public law enforcement agencies (Sec 4.4.6.3). Given that the public is involved with these training risk scenarios, public first responders should be intimately involved. Therefore, the claim in the EA of not needing participation of local law enforcement and other community emergency services is specious and must be revised with specific detail provided.

"In addition, there is the issue of privacy. Here as proposed, the public will be involved but there is no discussion of the privacy issue. Presumably with today's technology, there will be multiple recordings, video, audio or even written notes of the activities. As that includes the public, there must be some protection of their privacy and no privacy declaration is included in this EA.

"The no-action alternative suggests that some of these stealth training activities are already occurring. There should be a review of those activities to ascertain that there is proper citizen consent as this issue is now presented in this commentary and brought to the attention of the military and EA preparers.

"In any case, there needs to be a full and open discussion of why it is necessary to have public involvement in the proposed training operations."

Specific Comments

EXECUTIVE SUMMARY

ES.3 Alternatives Considered

Alternative 2 is the Preferred Alternative. Under Alternative 2, The maximum number of events across all non-federal land training sites would not exceed 330 events. For federal property, up to 265 events would occur per year.

ES p. ii

This appears to contradict Table 2-4. See that comment.

ES.3 Alternatives Considered

All training events on non-federal land would be conducted in accordance with real estate agreements and approvals.

ES p. ii

What happens if property owners refuse approval?

Socioeconomics and Environmental Justice

p. ES-iii

The people of Hawai'i already bear the impacts of thousands of acres of military bases. This action would add to impacts on quality of life, may affect the livelihoods of fishers and of workers who depend on tourism, and may lower property values.

The DEA should analyze the psychological and cultural impacts from military training activities popping up unexpectedly and repeatedly in areas where civilians are expecting beauty, quiet, connection with native Hawaiian culture, and opportunities for recreation.

Table ES-1: Summary of Potential Impacts on Resource Areas

Land Use - Recreation

p. ES-v

The proposed training activities under Alternative 2 would not restrict the ability of individuals to use or access recreational areas.

It's difficult to relax and refresh your spirits in recreational areas with soldiers landing in boats and flying overhead.

Biological Resources

p. ES-vi

In accordance with section 7 of the ESA, the Navy is currently conducting informal consultation with the USFWS and NMFS regarding potential effects of Alternative 2 (Preferred Alternative) on ESA-listed species and designated critical habitat.

Species would likely respond to the physical presence of trainees by temporarily stopping normal activities (e.g., feeding, resting) to move away from the activity. This type of impact is anticipated to be short term (where normal activities would resume after training events cease or move through the area) and minor (where behavioral changes would be insignificant). Potential effects to the species overall would be insignificant, as effects on individuals would be temporary and effects to habitat discountable because of the non-invasive nature and intent to leave no trace during or after a training event.

See first comment for ES.4.

For species in danger of extinction, even "insignificant" impacts push their chances of survival in the wrong direction.

Would humans think it insignificant, and suffer no ill effects, from actions disrupting their ability to eat and sleep, occurring unpredictably around their homes?

Noise

p. ES-viii

Training activities would generally occur away from residentially zoned areas and the operational conditions of land-based activities is to remain undetected and leave no trace of presence during or after the training. In addition, the operational conditions of aviation activities to maintain elevations above 2,000 feet except for short periods (below 500 feet for approximately 10 minutes) associated with proposed training under Alternative 2 avoids and minimizes noise and potential noise impacts. Disturbances are expected to be short term and infrequent and any impacts on points of interest are minimal and short term based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent

nature of the impacts, and (4) brief duration of the activities. Therefore, Alternative 2 would not result in significant impacts to the noise environment.

See comments on p. ES-v.

Many people find intermittent, unpredictable noise to be intrusive and bothersome.

Cultural Resources

p. ES-vii

Specific minimization and avoidance measures may be added after Section 106 consultation (including coordination with Native Hawaiian organizations) is complete.

See first comment on ES-4.

The DEA should evaluate intangible cultural impacts, such as noise and intrusion into culturally significant areas. How would people react to these actions occurring near Notre Dame or the Statue of Liberty?

Public Health and Safety

All training events on land areas and within state-owned harbors would be conducted in accordance with real estate agreements and approvals. A safety buffer would be established around maritime- and land-based training areas... NSWC would coordinate with the U.S. Coast Guard to notify mariners on the safety of navigation.

p. ES-ix

What happens if property owners refuse to allow training and/or safety buffers?

How would this affect people whose livelihood depends on going out in boats for fishing, or to take paying passengers?

1 Purpose of and Need for the Proposed Action

1.1 Introduction

p. 1-1

The DEA should analyze in depth how this training could be done on existing military lands in Hawaii and other locations, using military role players to substitute for civilians from various cultures. U.S. civilian areas and U.S. citizens will not provide an experience of dealing with locations and civilians of other cultures.

...the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities.

p. 1-1

How will trainees arriving in public spaces by aircraft or boat avoid detection?

How will trainees avoid leaving footprints and other traces on beaches?

Sites included in this EA would be selected based on the type of training to be conducted, ability of a site to support and facilitate the training, and receipt of real estate agreements/right-of-entry permits.

p. 1-2

See comment for p. ES-ix.

Safety support staff would typically visit a site prior to the training event. If members of the public are present, the staff will assess the situation and, based upon safety considerations, will either (1) not start the training, (2) continue the training, (3) temporarily suspend the training, (4) completely stop the training, or (5) relocate the training to another approved training site.

p. 1-2

What if civilians show up wanting to do subsistence activities, such as fishing, or looking for recreation?

What if they proceed onto the site despite being told not to go?

What if civilians out hiking find a 72-hour training blocking their path home?

Tourists with limited time may miss their only chance to visit some areas.

Because the nature of naval special operations requires them to operate worldwide, often times off military installations, it is imperative that their training provides this diversity and replicates real world environments; therefore, the use of non-federal land is imperative for training purposes.

p. 1-4

Surely some of the about 800 U.S military bases worldwide offer what is needed.

See first comment for 1.1.

1.7 Public and Agency Participation and Intergovernmental Coordination

The Navy, on behalf of NSWC, is consulting with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), State Office of Coastal Zone Management, and the State Historic Preservation Division (SHPD) on the Preferred Alternative (Alternative 2). Informal consultation with USFWS under section 7 of the ESA is in progress...

Informal consultation with NMFS under section 7 of the ESA and the Magnuson-Stevens Fishery Conservation and Management Act is in progress...

Consultation under the NHPA Section 106 is in progress with SHPD...

p. 1-19 to 1-20

Since consultations with agencies are not complete, information on impacts is incomplete, preventing the public from making meaningful comments. The DEA should be re-done and sent out for comments again after consultations are complete, incorporating and analyzing all available information.

2 Proposed Action and Alternatives

2.1 Proposed Action

Training events are progressive in nature and would range between 2 and 72 hours...

p. 2-22

See comments for p. 1-2

2.1.2.3 Launch and Recovery Training Activities

... trainees would be trained to approach or depart an objective area using submersible craft, to include UUV and ROVs, or watercraft (such as jet skis, waverunners, or small boats).

p. 2-24

These can be noisy. How would trainees achieve the objective of avoiding detection?

Submersible and surface crafts would have lighting for night training.

p. 2-24

How will wildlife be affected? And the peace of the night ocean and shore?

Noise should be weighted more bothersome at night and in remote, quiet areas.

During launch and recovery training events, training would be conducted in water areas and consist of launching and recovering submersibles or surface craft, or a combination of both, from a boat ramp, water platform, or via a crane located on a ship or a barge (not on federal property).

p. 2-24

How would trainees achieve the objective of avoiding detection?

2.1.4.3 Unmanned Aircraft Systems Training Activities

For training outside restricted airspace or warning areas, the UAS would be flown over federal property.

p. 2-27

Which Federal property? Without specifics, the public cannot make meaningful comments.

2.2 Training Sites

... training activities include... Simulated building clearance and UAS... Federal property within the training study area.

p. 2-28

See comment for p. 2-27.

2.5 Alternatives Development

p. 2-32

Instead of evaluating alternate levels of training, the DEA should evaluate alternate locations.

See first comment for p. 1-1.

Note that the Stryker project was delayed when they failed to consider alternate locations.

"The U.S. Court of Appeals for the Ninth Circuit has ruled the U.S. Army violated the National Environmental Policy Act (NEPA) when it failed to consider any location other than Hawai'i for conversion of the 2nd Brigade of the U.S. Army's 25th Infantry Division into a brigade built around the 25-ton Stryker fighting vehicle. The court agreed with native Hawaiian organizations... that the Army's decision to transform in Hawai'i was illegal, since it failed to conduct the mandated analysis of the environmental impacts of stationing a Stryker brigade in Hawai'i or of "reasonable alternatives to such a transformation.... The Ninth Circuit's ruling that the Army violated NEPA means the Army must cease all Stryker-related activities, including construction and Stryker training, until the court can rule on what activities, if any, will be allowed while an SEIS is prepared."

*Court of Appeals rules: Army violated law in bringing Stryker brigade to Hawai'i
Victory: Army Must Prepare Supplemental EIS that Considers Alternate Locations
October 5, 2006, <https://Earthjustice.Org/News/Press/2006/Court-Of-Appeals-Rules-Army-Violated-Law-In-Bringing-Stryker-Brigade-To-Hawaii>*

Table 2-4: Proposed Frequency of Training by Alternative

Alternative 2... Island of Hawaii... Kauai... Maui Molokai Lanai... (Maximum total of events on all non-federal sites would be 330 events) Up to 265 events of training on federal property per year.

p. 2-36

It's unclear whether the totals are statewide, or for all neighbor islands combined, or for each neighbor island. Lack of clarity means the public cannot make meaningful comments.

Even assuming the lowest possible numbers, there would be a rough average of three events a week on each neighbor island—three times a week when impacts to endangered species and civilians could occur.

3 Affected Environment and Environmental Consequences

The potential impacts on the following resource areas are considered to be negligible or non-existent, and therefore were not analyzed in detail in this EA...

Geological Resources: The Proposed Action does not include construction on undeveloped lands or ground-disturbing activities in any undisturbed areas.

p. 3-42

The DEA should analyze the effects of training activities, boats, and equipment on previously undisturbed beaches and on shoreline springs.

Visual Resources: The Proposed Action does not include construction or permanent new structures over an undisturbed area and would not alter the visual landscape within the training study area. In addition, any vegetation clearing (only proposed at one location) would not change the overall composition of the landscape.

p. 3-42

Ships, planes, and troops WILL alter the visual landscape, temporarily, and people will have difficulty refreshing their spirits in beautiful, unspoiled places if military equipment and soldiers may pop up at any time.

Transportation: The Proposed Action would not change or alter transportation facilities or circulation of traffic patterns within the training study area or surrounding area.

p. 3-43

On the contrary: sometimes locals in vehicles, on foot, or in the water will be kept out of training areas.

In the event maritime vessels approach an active dive site, safety personnel would utilize

Channel 16 (intended for international distress, safety, and calling) to contact vessels as needed.

If an oncoming vessel does not respond, a safety boat would approach the vessel and,

depending on the situation, ask it to (1) hold its position, (2) go around the dive site, (3) if

necessary be escorted by the safety boat around the dive site, or (4) divers would be recalled out

of the water. 2.1.2 Water-Based Training p. 2-23

...NSWC Public Affairs Officers or their representatives would be available to interact with the public should anyone approach an active training scenario. **2.1.3 Land-Based Training Activities** p. 2-25

When necessary, there would be support personnel on site to maintain a safety buffer, to prevent bystanders or traffic from entering into designated drop or landing zones. **2.1.4 Air-Based Training Activities** p. 2-26

3.2 Land Use-Recreation

3.2.2 Affected Environment

3.2.2.5 Land Use Compatibility

The Navy will complete a Federal Consistency Determination for activities that will occur on non-federal lands.

p. 3-56

Since the Determination is not done yet, the DEA is again missing significant information, depriving the public of the ability to make meaningful comments.

3.3 Biological Resources

3.3.2 Affected Environment

3.3.2.3 Special-Status Species

A total of 34 ESA-listed species are potentially present within the training study area: 5 terrestrial plants, 1 terrestrial mammal, 9 birds, 8 insects, 2 marine fish, 3 sea turtles, and 6 marine mammals ... The training study area also includes portions of federally designated critical habitat for nine terrestrial plants and two marine mammals.

p. 3-70

The training would only add to the pressure on threatened and endangered species.

3.3.2.3.3 Special-Status Birds

Hawaiian Coot (*Fulica alai*)

Occurrence within the Island of Hawaii Training Study Area. Four ponds support the majority of coots on the Island of Hawaii, with only two within the training study area: Aimakapa and Opaepa ponds...

p. 3-82

See comment for p. 3-70.

Hawaiian Stilt (*Himantopus mexicanus knudseni*)

Occurrence within the Island of Hawaii Training Study Area. Hawaiian stilts occupy the same Aimakapa and Opaepa ponds along the Kona Coast as Hawaiian coots (The Aimakapa and Opaepa ponds anchor the continuous network of wetlands along the Kona Coast and together have maintained 95 percent of the Hawaiian stilts for the Island of Hawaii...

p. 3-82

See comment for p. 3-70.

3.3.2.3.4 Special-Status Invertebrates

Yellow-faced Bees (*Hylaeus* spp.)

These bees are important pollinators of native Hawaiian plants, many of which are also endangered.... Of the seven yellow-faced bee species, only *H. anthracinus* was historically found on the Island of Hawaii.

Currently, the species is known from three locations potentially within the training study area: Kona Coast State Park, Kaloko-honolohau National Historic Park, and Makalawena Beach ..

p. 3-90

See comment for p. 3-70.

Table 3-11: Summary of Potential Impacts on Resource Areas

Resource Area: Cultural Resources

Specific minimization and avoidance measures may be added after Section 106 consultation (including coordination with Native Hawaiian organizations) is complete.

p. 3-153

See comments for 1.7.

Personnel involved in Navy training should receive training in recognizing Hawaiian cultural sites. These often include subtle features not recognizable without special training, and may consist of geographically separated, but culturally related, sites.

###



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E

N45

March 31, 2021

Walter Ritte
PO Box 367
Hoolehua HI, 96729

Dear Walter Ritte:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Table 5-1 (Principal Federal and State Laws Applicable to the proposed action) in Section 5.1 (Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions), has been revised in the Final EA to provide a summary of the compliance status for applicable laws and regulations, including Hawaii Revised Statutes (HRS) Chapter 343, HRS Chapter 195D, HRS Chapter 6E, Hawaii Administrative Rules (HAR) Chapter 11-200, and HAR Chapter 13-124. Site-specific real estate agreements would be obtained prior to conducting training in areas where consent is needed. The proposed action does not include the leasing of submerged lands; thus Chapter 190-D is not applicable. The proposed action does not include activities triggering HRS 183D-1-66.

All training would be conducted in accordance with natural resource management plans applicable to the landownership: for the Navy-owned lands, Integrated Natural Resource Management Plans would be followed; for State or County lands, management plans and right of entry permits, or other real estate agreements would be followed; and private lands would be subject to right of entry permits, or other real estate agreements. The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources).

At the time of the Draft EA, some consultations had begun, and other consultations were planned but had not yet occurred. Consultations have since occurred and are completed with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, State of Hawaii Office of Planning for Coastal Zone Management Act compliance, and the State Historic Preservation Officer (SHPO). Please see Appendix A (Agency Correspondence) of the Final EA for associated correspondence and consultation documents.

The Area of Potential Effect (APE) for National Historic Preservation Act (NHPA) Section 106 is synonymous with the project Study Area and has been revised for the Final EA. Training would be conducted in selected coastal nearshore waters and shorelines, and inland locations throughout the State of Hawaii where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. The purple area depicted on the maps in the Draft and Final EAs is a Study Area for the purposes of analysis and is greater in area than the sites where training activities would occur.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas. Based upon discussions with representatives from Molokai during teleconference calls on August 13, October 22, and October 29, 2020, the Navy reduced the training study area depicted in the Draft EA to two smaller areas along the southern coast of Molokai (see Figure 1-12 of the Final

EA). Proposed training within these training study areas would only occur where a right of entry permit, or other real estate agreement with a willing property owner or property manager, was obtained. No land-based or air-based training is proposed on Molokai, as proposed training is limited to water-based training activities.

The Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur.

Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to provide trainers with flexibility to select increasingly complex and challenging locations to meet training requirements. Additionally, a wide array of training sites allows NSWC to readily meet the challenges imposed by seasonal environmental fluctuations (e.g., tides, currents), public events, and/or environmental concerns that may arise during pre-training planning efforts. Finally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same training activities are routinely conducted using the same sites.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii SHPO, National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the NHPA for this undertaking, and adequately documented its finding of effect and fulfilled the Navy's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with the NHPA Section 106 Implementing Regulations at 36 Code of Federal Regulations (CFR) 800.4(d)(1). On May 29, 2020, the SHPO concurred with a Finding of No Adverse Effect. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy received your comments on the November 2018 Draft EA for the proposed NSWC training on 14 December 2018 in which you requested to be a consulting party under Section 106. Unfortunately, your letter was inadvertently misfiled and, once discovered, you were contacted via email/phone and set up three telephone meetings (13 August, 22 October, and 29 October 2020) to discuss your concerns about effects of the proposed training on historic properties. The notes from those meetings are attached as Enclosure 2. The Navy has provided a letter to the Hawaii SHPO summarizing these telephone meetings and to provide a record of the parties consulted with after the issuance of the May 2020 concurrence under NHPA Section 106. In addition, the Navy will work with responsible state agencies to address HRS Chapter 6E compliance where applicable and Native Hawaiian Organizations' comments may be solicited and considered at that time.

NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8 through December 10, 2018). Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. The Draft EA was made available online and copies were placed in public libraries.

The Notice of Availability also included a solicitation for individuals or organizations interested in participating in the NHPA Section 106 process: "Concurrent with the National Environmental Policy Act (NEPA) process, the Navy is conducting National Historic Preservation Act Section 106 consultations regarding potential effects of the Proposed Action on historic properties. NSWC has determined that the naval special operations training is considered an undertaking as defined in the National Historic Preservation Act 36 CFR §800.16(y) and has the potential to cause effects on historic properties. Pursuant to 36 CFR §800.2(d), 800.3(b), and 800.3(e), the Navy is soliciting members of the Public who wish to participate as consulting parties in the National Historic Preservation Act Section 106 process associated with this Undertaking. If interested in participating, provide written notification at the email or physical addresses below within 30 days of this notice."

5000-45E
N45
March 31, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI R.122943893
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Digitally signed by
ENG.SHERRI.R.122943
8936
Date: 2021.03.31
14:08:55 -10'00'

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosures: 1. December 14, 2018 comment letter from Walter Ritte, 'Aina Momona.
2. Meeting notes from August 13, October 22, and October 29, 2020 teleconference calls
between interested Molokai parties and NSW and EA personnel.

Copy to: Hawaii Department of Land and Natural Resources



Executive Director, Walter Ritte

Board of Directors

President, Jonathan Kay Kamakawiwo‘ole Osorio, Ph.D.

Vice President, Trisha Kehaulani Watson, J.D., Ph.D.

Second Vice President, Keoni Kauwe, Ph.D.

Secretary, kuualoa hoomanawai, Ph.D.

Treasurer, Randall Akee, Ph.D.

December 14, 2018

Approving Agency:

Department of Land and Natural Resources, State of Hawai‘i
Samuel Lemmo, Office of Conservation and Coastal Lands Administrator
Kalanimoku Building, 1151 Punchbowl St, Room 131
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sam.j.lemmo@hawaii.gov
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Applicant:

U.S. Naval Special Warfare Command
Julie M. Zimmerman, Senior NEPA Planner (EV21)
Naval Facilities Engineering Command, Pacific
258 Makalapa Drive, Ste 100
Pearl Harbor, HI 96860-3134
NFPAC-Receive@navy.mil

Consultant:

ManTech International Corporation
420 Stevens Ave., Suite 300
Solana Beach, CA 92075
Attention: Meagan Ostrem
Meagan.ostrem@mantech.com

Submitted via email (Comments due January 7, 2019)

Re: Naval Special Operations Training Hawai‘i

Republished HEPA DEA Available online at:

http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2018-12-08-ST-Republished-DEA-Naval-Special-Operations-Training-Hawaii.pdf

NEPA DEA Available online at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information/environmental-assessments-availble-for-public-review.html

ENCLOSURE 1

Page 2

HRS Chapter 343 Triggers:

- (1) Propose the use of state or county lands or the use of state or county funds
- (3) Propose any use within a shoreline area

Dear Mr. Lemmo and Ms. Zimmerman,

Āina Momona is a 501(c)(3) Native Hawaiian Organization based in Hawai'i that meets the definition of "Native Hawaiian Organization" as defined under 36 C.F.R. 800.16 (s)(1) as we are an incorporated organization which serves and represents the interests of Native Hawaiians, we have a primary and stated purpose that provisions services to Native Hawaiians, and we have demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians. Multiple members of our board exceed the Secretary of Interior's Professional Qualification Standards as set forth in 36 C.F.R. Part 61.

We are seeking immediate inclusion as a consulting party to the aforementioned undertaking and/or any subsequent undertakings related to this activity and/or any future undertakings within the area of potential effect or adjacent properties.

To this end, we would like to be included in all future communication related to the Section 106 process and copies of all past records and communications of the Section 106 to date. I, Walter Ritte, will serve as the organization's representative to these consultations.

We have very serious concerns that this project violates the National Historic Preservation Act (NHPA) 54 U.S.C. 306108, as amended, and its implementing regulations, 36 C.F.R. Part 800, as amended. We also believe violations of Hawai'i Revised Statutes (HRS) Chapter 6E are being proposed and raise serious objection to the Navy's proposed activities. **We believe Chapter 6E applies due to the activities occurring on state lands and the HEPA DEA contains no documentation whatsoever regarding its compliance with HRS Chapter 6E and Act 50 (2000), both of which are required before the environmental assessment can be accepted by the State of Hawai'i.**

The Draft Environmental Assessment additionally fails to include Chapter 6E approval on its list of permits and approvals required. It also fails to list that a CDUP (Conservation District Use Permit) or similar approval would be required from the Department of Land and Natural Resources. Furthermore, the Assessment fails to acknowledge that part of its activities will take place with the Hawaiian Islands Humpback Whale National Marine Sanctuary, and as such, approval from that authority is required.

We can find no authority that preempts these actions from state or local law. Federal preemption may occur in one of three ways: (1) the federal law expressly preempts state or local laws; (2) the federal law impliedly preempts a state or local law by occupying an entire field of regulation, so that no room is left for state regulation; or (3) state law is preempted to the extent it actually conflicts with federal law because compliance with both state and federal law is impossible, or when a state law stands as an impediment to a federal purpose. *Rim Creek Coal Sales, Inc. v. Caperton*, 971 F.2d 1148 (4th Cir. 1992). We challenge the Navy to demonstrate how it is

Page 3

preempted from applicable state and local laws or alternatively resubmit a Draft Environmental Assessment that accurately identifies all applicable state permits and approvals required for the action to go forward and provide sufficient information in the draft as to comply with such laws. HAR §11-200-10(11) requires the assessment to include “all known or anticipated discretionary permits and approvals, as well as ministerial permits and approvals, for the proposed action. This list should include all state, county, and federal approvals.” The draft cannot simultaneously list the following legislative authorities but then fail to list the permits and approvals required under these authorities.

- Hawaii Revised Statutes, section 6E-8
- Hawaii Revised Statutes, sections 183D-1-66
- Hawaii Administrative Rule, Chapter 13-124, Exhibit 2 and Hawaii Revised Statutes, section 195D

Summary of Proposed Action:

The United States (U.S.) Naval Special Warfare Command is the U.S. Navy's special operations force and maritime component of the U.S. Special Operations Command. The Naval Special Warfare Command has prepared this Environmental Assessment in accordance with the National Environmental Policy Act (as implemented by Council on Environmental Quality and Navy regulations) and Hawai'i Revised Statutes, Chapter 343. The Proposed Action supports small unit intermediate and advanced land, maritime, and air-based training activities for naval special operations personnel. Training would occur in the nearshore waters and land-based areas on O'ahu, Island of Hawai'i, and Kaua'i, and in nearshore waters (including harbors and bays) of Maui, Moloka'i, and Lāna'i.

Insufficient 36 C.F.R. Part 800 (Section 106) and HRS Chapter 6E Compliance

We find that the plan and corresponding environmental assessment fail to adequately to meet the well-established requirements of both Section 106 and HRS Chapter 6E. The plan also fails to meet the standards of an adequate environmental assessment document provided in the corresponding Hawaii Administrative Rules.

Failure to Meet HEPA and NHPA Standards

Page ES-ii of the draft states, “Consultation under Section 106 of the National Historic Preservation Act (NHPA) is in progress with SHPD to assess the effects of the proposed action on historic properties. The Section 106 consultation includes coordination with Native Hawaiian organizations.” Under HAR §11-200-10(12) copies of the written correspondence from this early consultation is to be included in the draft. Within the current draft, it is not provided. Additionally, beyond this vague reference to Native Hawaiian organizations, there is no indication that consultation with Native Hawaiian organizations has actually taken place.

As early consultation is encouraged under HAR §11-200-10(3) and required under both NHPA and HRS Chapter 6E, we feel the document fails to meet the standard established under the applicable administrative rules. There are a significant number of organizations with cultural or religious interests in historic properties that would be impacted by the proposed action. We

Page 4

would be happy to provide this list to the Navy during a proper consultation process. Therefore, please consider this notice that we would like to reserve the right of organizations that have not been consulted through NHPA to comment on the proposed action. We feel that failure to meet this standard and allow for this consultation would result in violation(s) of NHPA and potentially HRS Chapter 6E.

Failure to Meet NHPA Standards

The Assessment states the following: "Consultation under the NHPA Section 106 is in progress with SHPD to assess the effects of the proposed action on historic properties. The Navy does not anticipate any adverse effects to historic properties in accordance with the Section 106 Implementing Regulations." This appears to contradict the aforementioned statement in the draft which identifies consultation with Native Hawaiian organization. 36 C.F.R. 800.3 states: "The agency official shall make a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties. Such Indian tribe or Native Hawaiian organization that requests in writing to be a consulting party shall be one." As mentioned above, there is no documentation in the draft that shows any effort, let alone a reasonable and good faith one, was made to identify NHOs that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties.

The draft additionally fails to adequately comply with 36 C.F.R. 800.4,¹ which calls for thorough identification efforts. The draft states the following: "The DoD has conducted inventories of

¹ (a) Determine scope of identification efforts. In consultation with the SHPO/THPO, the agency official shall:

- (1) Determine and document the area of potential effects, as defined in § 800.16(d);
- (2) Review existing information on historic properties within the area of potential effects, including any data concerning possible historic properties not yet identified;
- (3) Seek information, as appropriate, from consulting parties, and other individuals and organizations likely to have knowledge of, or concerns with, historic properties in the area, and identify issues relating to the undertaking's potential effects on historic properties; and
- (4) Gather information from any Indian tribe or Native Hawaiian organization identified pursuant to § 800.3(f) to assist in identifying properties, including those located off tribal lands, which may be of religious and cultural significance to them and may be eligible for the National Register, recognizing that an Indian tribe or Native Hawaiian organization may be reluctant to divulge specific information regarding the location, nature, and activities associated with such sites.

The agency official should address concerns raised about confidentiality pursuant to § 800.11(c).

- (b) Identify historic properties. Based on the information gathered under paragraph (a) of this section, and in consultation with the SHPO/THPO and any Indian tribe or Native Hawaiian organization that might

Page 5

cultural resources at the SHPD for areas outside of DoD lands and at all installations, including Marine Corps Base Hawaii, JBPHH Region, Barbers Point, and Kahuku Training Area on Oahu; and the PMRF on Kauai, to identify historic properties that are listed or potentially eligible for listing in the NRHP.”

- 1) These inventories have not been made available in the assessment, therefore, they are not available for the public or Native Hawaiian Organizations to review.
- 2) The documentation in the draft fails to meet the Secretary of Interior’s Standards for Identification.²

attach religious and cultural significance to properties within the area of potential effects, the agency official shall take the steps necessary to identify historic properties within the area of potential effects.

(1) Level of effort. The agency official shall make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey. The agency official shall take into account past planning, research and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects. The Secretary’s Standards and Guidelines for Identification provide guidance on this subject. The agency official should also consider other applicable professional, State, tribal and local laws, standards and guidelines. The agency official shall take into account any confidentiality concerns raised by Indian tribes or Native Hawaiian organizations during the identification process.

² Integrating Identification Results

The results of identification efforts must be integrated into the planning process so that planning decisions are based on the best available information. The new information is first assessed against the objectives of the identification efforts to determine whether the gathered information meets the defined identification goals for the historic context(s); then the goals are adjusted accordingly. In addition, the historic context narrative, the definition of property types and the planning goals for evaluation and treatment are all adjusted as necessary to accommodate the new data.

Reporting Identification Results

Reporting of the results of identification activities should begin with the statement of objectives prepared before undertaking the survey. The report should respond to each of the major points documenting: Objectives; Area researched or surveyed; Research design or statement of objectives; Methods used, including the intensity of coverage. If the methods differ from those outlined in the statement of objectives, the reasons should be explained. Results: how the results met the objectives; result analysis, implications and recommendations; where the compiled information is located.

A summary of the survey results should be available for examination and distribution. Identified properties should then be evaluated for possible inclusion in appropriate inventories.

Page 6

- 3) The identification effort was inadequate. The draft states, “The Navy reviewed existing information on historic properties within the APE from the SHPD, from the DoD cultural resources reports, and from the National Park Service’s Focus digital library. This review resulted in the identification of 852 historic properties (listed and eligible) in the APE: 580 from Oahu, 182 from Hawaii Island, 80 from Kauai, 0 from Lanai, 4 from Maui, and 6 from Molokai. Although these historic properties are within the APE, the majority will not be utilized for training. These traditional and historic resources are located in the waters and on the shores of the Hawaiian Islands, many of which have not been evaluated for National Register eligibility. However, they will be treated as eligible for consultation purposes. The Navy also reviewed the inventory of properties listed in the NRHP through the National Park Service’s Focus digital library and found 33 listed properties in the APE: 5 National Historic Landmarks (NHLs), 6 historic districts, 14 buildings and structures, 2 historic objections, and 6 archaeological sites.” The draft fails to identify the 852 historic properties in the APE denying the public the opportunity to review the identification effort for accuracy.
- 4) We also feel the results are inaccurate. Since the Navy failed to identify any consulting parties or NHOs beyond SHPD, we feel it is not an accurate assessment, which was determined from the failure to completely acknowledge any sites on Lāna‘i. The Assessment is short-sighted in its characterization of properties. The Assessment states: “Cultural resources that are listed in the NRHP or determined eligible for listing in the NRHP are “historic properties” as defined by the NHPA.” The definition provided under 36 C.F.R. 800.16, which reads: “(1)(1) Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.” (Emphasis added.)

Failure to Adequately Consider Traditional Cultural Properties

Traditional Cultural Properties are defined by the U.S. Department of the Interior National Parks Service American Indian Liaison Office as “a property that is eligible for inclusion in the NRHP based on its associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community” (U.S. Department of the Interior, 2012). No Traditional Cultural Properties have been identified in the APE on O‘ahu or Hawai‘i Island. We feel this is an absurd and inaccurate conclusion and a demonstration of the inadequacy of the document. First, it is premature to have reached such a conclusion when consultation has been non-existent and/or inadequate thus far. Second, Bulletin 38 (NPS) encourages the use of experts

Protection of information about archeological sites or other properties that may be threatened by dissemination of that information is necessary. These may include fragile archeological properties or properties such as religious sites, structures, or objects, whose cultural value would be compromised by public knowledge of the property's location.

Page 7

with proper knowledge of culture and ethnography to conduct work on TCPs. There is no indicator that this project team has any such expertise with Native Hawaiians or Hawaiian cultural practices, traditions, religious beliefs, lifeways, arts, crafts, or social institutions. The coastlines included in the APE are literally riddled with historic fishponds and other historic sites that have been summarily excluded from this study's consideration. Without further, proper and adequate identification and assessment as required under the law, this project should absolutely not be allowed to proceed.

The draft notes that:

Studies at the PMRF Barking Sands in the APE on Kaua'i have identified one traditional cultural property (U.S. Department of the Navy, 2014). This traditional cultural property, called Nohili Dunes, includes Elekuna Heiau, an ancient burial ground, and habitation sites. The legend of Nohili Dunes identifies a fisherman who went out to sea, tying his nine dogs to three stakes before he left. When he returned home, exhausted after battling heavy seas, he forgot to untie his dogs. In the morning, the dogs had disappeared, but three mounds of sand remained and, upon each step on the sand, he heard a low bark. He dug for the dogs, but this only generated more "barking" sands, and he continued to hear the barks daily as he crossed the beach. For this reason, the Nohili Dunes are known as Barking Sands (Dlendorf, 2013). This traditional cultural property is eligible for listing on the NRHP.

There are numerous other sites deserving of equal consideration and review. The arbitrary review of only a single site fails to meet the threshold standard of adequate NHPA review and compliance.

The study also makes the shocking statement: "Traditional Cultural Properties are generally found on land and therefore are not found in the APE on Maui, Molokai, or Lanai." This is fundamentally untrue. There is an entire discourse emerging around maritime cultural properties and maritime cultural landscapes. The NPS has even held symposia on this topic. Again, we find the Navy's inability to recognize that Hawaiians, as ocean-faring people, would have numerous properties that meet the criteria of both the NRHP and TCPs a demonstration of the inadequate, and amateur nature of this document.

Failure to Provide Adequate Information to Assess Impacts Under State Law

As the Navy's activities are taking place in state laws, HRS 183 and 195D both apply. We feel that the draft fails to provide adequate data and analyses of how it complies with these laws.

Conclusions and Recommendations

As mentioned above, we feel this assessment fails to adequately:

- 1) Determine and document the area of potential effect;
- 2) Review existing information on historic properties within the APE;

Page 8

- 3) Seek information from consulting parties and knowledgeable parties regarding historic properties in the area and identify issues relating to the undertaking's potential effects on historic properties; and
- 4) Gather information from NHOs like ours.

The plan further fails to identify historic properties and sufficiently evaluate them for historic significance. Most critically, the plan and assessment categorically adequate conduct the effects assessment required under applicable law.

It is our strong position that this proposed alternative will have a significant adverse effect on historic properties within the APE. We feel, specifically, that the proposal will directly and indirectly alter the characteristics of historic properties qualified for the National Register in a manner that would diminish the integrity of the properties' location, setting, feeling, and association. Tourism has been known to significantly and adversely impact areas across Hawai'i and, specifically, Moloka'i. The Navy proposal will change the character of the property's use within the property's setting that contributes to its historic significance. Additionally, we believe additional activities related to this proposal will introduce visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features.

We are unaware of any provision in the National Historic Preservation Act that preempts state or local laws. Therefore, HRS Chapter 6E and Chapter 183 should apply to this action insofar as the activities are taking place on state lands and in state waters, particularly coastal waters.

We request immediately inclusion into and initiation of a Section 106 process that adequately complies with the NHPA and Chapter 6E. We would like an acknowledgement of the adverse effects and subsequently we would like a consultation process that moves towards the development of a MOA or PA.

We urge the SHPO not to approve or concur with any proposed decision, determination, or finding by NPS until proper consultation and compliance with Section 106 takes place.

Thank you for your prompt consideration of our consideration and your immediate response to our request as inclusion as a consulting party to this undertaking.

Respectfully submitted,

/s/ Walter Ritte, Executive Director
Āina Momona

cc: Alan Downer, Ph.D., State Historic Preservation Officer
Susan Lebo, Ph.D., State Historic Preservation Division
Jaime Loichinger, Advisory Council on Historic Preservation
Scott Glenn, Office of Environmental Quality and Control

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Thursday, August 13, 2020

Time: 1435-1600 (Hawaii time)

Location: Teleconference

ATTENDEES

NAME*	ORGANIZATION*
MOLOKAI REPRESENTATIVES	
K. Rawlins-Fernandez (KRF)	Vice Chair, Maui County Council
L. Buchanan (LB)	Molokai Aha Kiole
T. Kehaulani Watson (TWK), Vice President	‘Aina Momona
W. Ritte (WR), Exec. Director	‘Aina Momona
Mahina Poepoe (MaPo)	
J. Caparida (JC)	
Sol Kawoohalahala (SK)	Lanai Representative, Chair HWNMSAC
M. Akutagawa (MA)	Molokai Representative, HWNMSAC
C. Schnackenberg (CS)	Ahonui Homestead Association
NAVY REPRESENTATIVES	
J. Bigay (JB), PM and NEPA Planner	NAVFAC Pacific
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
C. Rasmussen (CR), Archaeologist	NAVFAC Pacific
R. Rowland (RR), Assistant Counsel	Navy Region Hawaii
CWO E. Alvarado (EA), SEAL Training Officer	U.S. Special Operations Command
R. Spaulding (RS), PM	ManTech International Corp.

Notes: * HWNMSAC = Humpback Whale Nat'l Marine Sanctuary Advisory Council NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager; SEAL = Sea, Air, and Land.

Purpose

The purpose of the call is to follow-up with Molokai representatives and residents regarding their comments on the November 2018 Draft EA for NSO Training in Hawaii. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

JB: welcomed everyone to the call and provided a quick introduction to the attendees (see above table) on the Navy side and their role in the EA process. Requested that everyone provide to JB via email their name and group name so that we ensure that we have accurately recorded all attendees. The purpose of our call is to follow-up with you regarding your comments on the Draft EA for Navy Special Operations (NSO) Training in Hawaii published in late 2018/early 2019. We want to be sure that we have addressed your concerns particularly with respect to the State of Hawaii Chapter 6E⁽⁵⁾ process. This is a joint Department of Defense NEPA and state of Hawaii HEPA document. The team here today is not authorized to make any decisions or changes to the proposed action in the EA at this time, but are here to listen and record your

⁽⁵⁾*Note:* After the phone call, the Navy determined that these discussions are not under the 6E process. These consultations are to support the HEPA and NHPA Section 106 processes and to obtain information from stakeholders, agencies, and interested parties regarding their concerns regarding the proposed training activities.

ENCLOSURE 2

concerns. We will respond to you via letter, which will become part of the Final EA. We are hoping to keep to the scheduled time and have the call end around 4 pm. If we need to, we can schedule another call at a later date and time.

MP: provided an overview of the proposed NSO training in Hawaii. She will then turn it over to EA to explain the training.

- Naval Special Warfare has been conducting training operations in Hawaii since the mid-1990s. Hawaii was chosen due to warm water and proximity to numerous military assets throughout the state of Hawaii. Have trained on all the neighboring islands but mainly Oahu.
- As shown in the EA, there is a large purple training study area along the southern coast of Molokai. This was done for several reasons. (1) It was simply a study area. It was difficult to analyze a particular area for wave action if that wave action covered a larger area. (2) We could not show the specific training sites as that would be considered pre-decisional. If we noted a specific spot then our analysis was focused only on that location. (3) We do not know if the property owner for a particular area will allow training in that area until we complete the EA process. Then we can go out to the private, city, county, or state level. We have to have the environmental process completed before we could ask for permission for a particular site. In addition, if a particular site is chosen and approved as a training site at the end of the EA process, if in a year, 5 years, etc. the landowner decides they no longer wish to have NSO training on their property, the Navy can go back to the analysis within the larger training study area and consider other sites that could potentially support NSO training that were not carried forward during the initial EA process. Allows more flexibility.
- We can only conduct the training that is proposed in the Final EA and cannot deviate from the Final EA.
- I will now turn it over to CWO Alvarado to explain the type of proposed training. For Molokai, only water-based training would occur – no training on land and no training in the air with aircraft. Only 2 harbors are proposed for use along the southern coast.

EA:

- Overall intent of training is for SEALs to train in an environment they have not seen before. Goal of the proposed SEAL training is to conduct the operations without being detected. Typically, SEAL divers are accompanied by 2 safety vessels at all times. These will be identifiable by dive flags or dive lights. We will not go into any area without proper approvals. This means contacting the harbor master and local law enforcement. They will typically be present during the training. A safety officer will oversee the training as well as a medical officer in case there is an emergency. We work with local boaters and fishers, to ensure that we are not impeding the public. We often come up to fishers or others to explain what we are doing if we have divers in the water.
- There will be no form of “beach invasion.” No more than up to 18 trainees would be in the water at any one time.
- The overall scope or grading for the trainees is to remain undetected. Typically, when we have done training throughout the Hawaiian Islands no one knows we were even there. Goal of trainees is to leave no trace of their presence during and after training.
- They are trained to go into an area silently, and move out without being detected.

MP:

- Goal of the proposed training is to leave no trace of the training while it is happening and after it has been completed. No intent to close any harbor while training is occurring. Training occurs between sunset and sunrise. There will be two <25-foot support boats (rigid-hulled inflatable boats [RHIBs], similar to a Zodiac or similar inflatable boat) offshore. Support personnel will watch the trainees and ensure their safety, other personnel will watch for civilian boat traffic. The public will not be denied access to any area and no area will be closed during training.
- If during a training exercise a commercial or recreational fisherman or other user begins to move towards the training area, the support watch personnel will monitor the boat’s activity. If a fisherman or other user comes too close to a training activity, they will be informed that a Navy

training activity is underway and may be asked to stop. If they do not wish to stop, then the training will stop. The training activity will either be halted momentarily until the fisherman or other user leaves the area, or the training will be stopped and the Navy personnel and trainees will leave the area. The goal is to never disrupt or stop any civilian activity during a training activity.

- Molokai harbors are attractive for training purposes because they are small, trainees have not seen them before, and they are not lit at night like harbors in Honolulu. They present a challenge.
- Training could occur in Molokai waters up to 10 times/yr. We are not expecting to train at that level in Molokai waters, only 2-4 times/yr; the level assessed in the Draft EA is a maximum.
- In addition to diver/swimmer training activities, also proposed use of a small 21-23-ft long electrically powered submersible. Trainees will maneuver the submersible in accordance with a training scenario, exit the submersible, swim into the harbor, conduct the training, and then swim back to the submersible, re-enter, and then exit the area. The sonar on the submersible that is used for navigation is equivalent to a standard off-the-shelf fish finder that is used by commercial and sports fishermen.
- The main training is diver/swimmer entering a harbor from the ocean.

JC: Sounds spooky, watching TV. Our community lives off the ocean. You did not prepare a good Environmental Assessment. [she mentioned a location Halena? And if the training was near there – hard to hear]

JB: Is that on the same side as Kaunakakai?

MaPo: Aunt Judy I think it is between Kaunakakai wharf and Hale O Lono Harbor.

JC: I don't know about that. Would be better to see people and talk in person. I will hear you guys out.

MP: We are proposing the 2 harbors: Kaunakakai and Hale O Lono. These are the only areas where we are proposing to train, respectfully train.

MA: *Do these activities include sonar, what exactly do the special ops activities entail? (Question 1 [Q1], see Response to Questions below) Two, I would like a briefing with the Humpback Whale Sanctuary Advisory Council because you have not consulted with us at all [Q2, see Response to Questions below]. Three, I was given a picture of a submarine came out of the water offshore of Molokai and concerns were expressed that activities were already taking place. Whales were behaving abnormally, keeping heads out of the water. Helicopters were overhead observing. Also concerned that you did an EA a while back and did not consult with the Humpback Whale Sanctuary Advisory Council. I don't want this to be you are just informing us and then go ahead and approve the EA. Finally, there is a significance criteria. If there are no significant impacts then it can remain an EA. I believe there are significant impacts to people of Molokai and the Humpback Whale Sanctuary and an EIS is warranted. Those are my comments and questions.*

KRF: Is this call being recorded and can it be shared with us.

JB: No, it is not being recorded, we are taking notes.

KRF: Will the people attending this meeting be able to review the notes?

JB: That is not something we normally do. We will address your concerns and comments in a letter back to the participants.

TKW: This is not very good practice to take notes and keep them internal. They should be shared with the participants so that they can say if they are accurate. *What are you considering this consultation for? An EA does not require consultation. Is this 6E, 106, or preparing for something else? What legal authority is this consultation for? [Q3, see Response to Questions below]*

JB: It's under 6E⁽⁶⁾. The State's HEPA regulation.

⁽⁶⁾Note: After the phone call, the Navy determined that these discussions are not under the 6E process. These consultations are to support the HEPA and NHPA Section 106 processes and to obtain information from stakeholders, agencies, and interested parties regarding their concerns regarding the proposed training activities.

TKW: HEPA and 6E are different laws. You can't conflate the 2. You don't mention 6E in the Draft EA. The EA is totally inadequate and you should reissue a Draft EA before moving to a potential FONSI. *If this is consultation under 6E, then you have made determination that there are significant sites under criterion E. Has that determination been made? [Q4, see Response to Questions below]* You have not provided an inventory of historic sites. Can you explain, as it doesn't make sense?

CR: We have identified a number of historic properties on Molokai and are aware of a number of fish ponds along the shore as well as fishing areas. We would like more input regarding your historic properties and cultural resources. One of the reasons we would like to talk with you. We have done a lot of research with the SHPO and spent a lot of time in their library reviewing records. We understand this does not come close to what you all know on Molokai. We wish to hear your concerns.

TWK: You are conflating 2 separate laws. 6E consultation is specific. Responsibility of identification of sites falls on the Navy. Under Section 106 identification is done as part of the consultation process. If this is 6E, should have been managed better. Should be clear that this is 106, and those should be made available to us and we need to approve. Unclear that you don't have an understanding of the state and federal laws. If you are doing an inventory, then we need to see a draft of that inventory, including previous studies and sites in map form. If you determine that sites are eligible under 106 under criterion E, then you do HRS 6E consultation. If this is 106, then the Navy needs to restart and do it properly. This is not how 106 is done. We should have received notice that this is a 106, calls to NHOs. Concerned that this is a haphazard consultation and used in a manner that we have not consented to. Urge you to have an internal meeting to understand the different statutes and to proceed in a more orderly manner.

MA: ACHP has issued guidelines that triggers Sec 106, they must also follow the UN declaration of rights of indigenous peoples. Requires prior informed consent. This framework needs to be followed to work with NHOs and you did not do that.

CS: I agree. If you are working under 6E, then something has already been determined. My concerns are: our kupuna are still doing subsistence gathering during low tide in the area of proposed training. The consultation should not be with selected leaders of Molokai, but should involve the community. The community needs to be notified and be part of the process. Also concerned about frequency and timing of the training. I am against it. I have not seen the full EA and all of us need to have it in hand. You represent the military and the people of Molokai are not in good terms with military. Trust is a big issue. Preservation of fish ponds is important and restoration is top priority. If we are to follow 6E then I agree with the previous speaker. The entire community needs to be involved and not a private meeting.

MP: No more than 2-4 times/yr and several hours each time to allow divers to enter and exit the harbors. No other activities.

CS: It's important to consider the season, not just frequency.

MP: Do you have particular seasons that need to be avoided?

CS: We have experts for gathering rights. Several areas where we harvest and where we do not harvest. There are always year-round seasons of harvest.

TWK: All of these questions. If you are going thru DLNR, you have an obligation to fulfill that analysis. This is not the appropriate forum to conduct the ethnographic work. I am concerned you do not have an understanding of the legal requirements that are in place for this type of work. I would strongly urge you to speak with someone about all the laws you need to comply with, including case law. There does not seem to be a clear understanding of what needs to be done.

MA: There needs to be a proper inventory of resources that impact Native Hawaiian rights and practices. Subsistence fishing and gathering and fish ponds need to be inventoried, then an assessment of how the proposed training would impact these resources and practices. Then there is a mitigation step to ensure that these rights and practices are protected. As a federal agency there is a fiduciary responsibility under the ceded lands trust (state waters) and given training will occur in state waters there is a public trust obligation under state law that includes native Hawaiian rights, resources, and practices. That is the proper methodology you should follow.

WR: Most of the items previously mentioned were outlined in our earlier comment letter. I wanted to talk about the history of military use on Molokai. I am 78 yrs old and there have been many times that the

military came to train on Molokai and all ended up with many problems. Huge fires, lot of traffic. Also the training on Kaho'olawe, and there are a lot of young people not happy with how lands on Pohakuloa are being used and also on Oahu. The military is not something we have high regard towards. They fight the wars for oil and stuff. Today you have heard all of things you have to follow in order not to get sued by the people of Molokai. There is no aloha to allow you guys to do what you want to do. The amount of times you want to train on Molokai is worth the time and money you will have to put in. Whether you do a 106 or 6E. Take a look at what is happening at this meeting, recommend you train in a different area. Thank you for allowing my comments.

CS: Mahalo for presenting to us. *In the event you don't follow through what you agreed to do, will there be a penalty or violation imposed on you?* [Q5, see Response to Questions below] I wanted to put this on the table.

MaPo: Published testimony online and was sent to testimony address, and collected over 1,600 signatures in opposition to the training on Molokai. Will you be responding to each of those people individually?

JB: There was a public comment process on the Draft EA in late 2018 and early 2019. That comment period has ended. We will respond to that testimony in the Final EA.

MaPo: I agree with the previous speakers regarding the consultation process. There is heavy opposition in the community to the proposed training. While we will participate and remain involved, but we will protest. It's the military and we have had bad experience in the past. People still finding bombs while mowing their lawns. Suspect that training is already happening without us knowing it. I understand that it may be only 2-4 times/yr but things will change. I do see it as taking of turf. We are trying to minimize military presence on island and waters. Military overflights at 11 at night that wake us up. Thank you.

WR: What are the next steps?

JB: The next step we will be processing 6E⁽⁷⁾ and satisfying that requirement and finalizing the EA. It will then be sent up through Navy channels to be approved. After that it will be sent to the State of Hawaii/DLNR for the HEPA process. It is then their decision whether they approve it.

MaPo: What is the timeline for the final document? For the support vessels, will there be armed people on the support vessels?

CWO EA: No, none of the trainees will be armed.

MaPo: Yes, no guns on the support vessels.

JB: Timeline for finishing the process is expected the end of the calendar year, but the exact timeline is uncertain at this time.

SK: I wanted to defer comments to the Molokai community. But we share the same waters that connect us in Maui Nui. I wanted to share a few comments. I support MA about the need for this information to be brought forward to the Humpback Whale Marine Sanctuary Advisory Council. I serve as chair of the Council, and *we are making a formal request that the Navy makes a presentation to the Council because you are within the sanctuary waters.* [Q2, see Response to Questions below] We take seriously the kinds of impacts that might be involved with anything to do with the kohola (humpback whale). It is something we expect and look forward to that meeting. The conversation and your presentation make it seem that your training within the realm of the Sanctuary are not invasive. If we had a conversation at a Hawaiian level, you would be surprised to hear that some of the simple actions that you assume to be noninvasive, might be so detrimental from a Hawaiian's perspective. None of the Hawaiian knowledge and understanding of place has been incorporate into any state, county or federal laws. Hawaiians have been left out of the

⁽⁷⁾*Note:* After the phone call, the Navy determined that these discussions are not under the 6E process. These consultations are to support the HEPA and NHPA Section 106 processes and to obtain information from stakeholders, agencies, and interested parties regarding their concerns regarding the proposed training activities. If a FONSI is issued under HEPA, the Navy will work with our Real Estate Office to obtain rights of entry. The 6E consultations will support this process.

conversation for these kinds of policy decisions. Moving forward we are in a time that requires much more consideration of the native peoples and their knowledge and practice of place. Carrying on things like the conversation we had today, the status quo, is far from reality. Need to make a paradigm shift as native peoples have contributions to make regarding their environment, resources, and homes. These types of training activities are not where we want to go. To continue to assume that the military has a need to continue this practice, we have an obligation to listen, give input, and then allow you to go do what you want. Without any contributions from native peoples. Without these considerations we do not see the kind of reality we see. The military needs to understand that we have been part of this place for thousands of years and your actions may be more adverse than you realize. In the meetings, you are trying to get us to provide you with information so you can make your decision. It shows you lack the understanding of who we are as a people. It is no longer acceptable that you assume these are practices that need to continue moving forward.

JB: Thank you for the comment.

TKW: Why haven't MA questions been answered, *what is the purpose of this meeting, what box are you checking off when meeting with us, and when do you plan on having a meeting with the community?* [Q6, see Response to Questions below]

LB: You have heard from only a few of us, but we have been doing this for all our lives. We've learned the process and know the process. *What is the purpose of today?* [Q6, see Response to Questions below] I wanted to tell CS that this was not a private meeting but we were contacted by the Navy because we submitted comments. Others who submitted comments will also be contacted. Due to the covid restrictions, and not being able to have in-person meetings, we have relied on TKW, MA, and Sol and others. I am surprised that the Humpback Whale Sanctuary was not contacted for the EA. We got the EA late, in early 2019. We regularly check the OEQC website to see what environmental notices come out. The EA is voluminous. If this document is not amended, then you have the authority to implement everything in the document, which is way more than what was presented in the meeting today. No matter what alternative you choose, you will have all the options. I lived thru the Marine Corps MV-22 EIS, and if things are not clearly spelled out that you end up in a year or 2, helicopters or Ospreys that fly over the shoreline late at night, don't communicate with commercial airlines. I think we all support the defense of the US. Most of us have family members that serve proudly in the military. But we must also protect our resources and part of that is becoming very diligent in reading the EA and knowing the law, in order to protect our resources. You have to go back and have a discussion to determine how you work with NHOs and stakeholders that have responsibilities within the area of the proposed action.

Wanted to thank you for reaching out. We submit testimony over a year ago and then we get an email regarding our testimony. We all met as a group and called our Congressional representatives.

MP: I can respond to some of the items you brought up regarding training. The EA covers proposed training throughout the Hawaiian Islands with most training on Oahu. The training for the neighboring islands is specific, and for Molokai we are only proposing diver/swimmer and use of a submersible. No other actions. We cannot include other activities that are not in the EA. If we received permission to use the harbors, we cannot add over the beach training, aircraft training, etc. We can only stick with what we said in the EA and for which we have approval to do.

LB: A right of entry is a permit between the Navy and DLNR and is a separate document.

MP: We do need a right of entry but unable to request a permit until the EA is complete. We can only do the activities and at the locations as stated in the EA. There is a table that lists the specific activities for Molokai. Only diver/swimmer and insertion/extraction. We can only do the things proposed.

RS: Table 2-4 in the Draft EA. Page 2-34. Table 2-3 shows what is proposed for Molokai. Presents same information but in a different way.

LB: Do you prefer Alternative 1 or 2.

JB: Alternative 2 is preferred, but does not mean it will be chosen.

LB: Navy can invite partner trainees from any country that wants to train with you?

MP: No, we will train only with US military. No foreign powers. I will find the text.

LB: It doesn't matter at this point, as this is all superseded by the discussion today from those that testified today on the phone. Table lists up to 330 events per year on non-DoD properties.

JB: these are events across the islands, not Molokai.

LB: Maui, Lanai, and Molokai. Diver/swimmer and insertion/extraction.

MP: Inserting and leaving the submersible, swim around the harbor, then leave the area.

LB: Are you paying a fee to use a training area?

MP: We don't know until we finish the EA and request a permit for a particular site.

LB: In the other sites in Hawaii do you pay a fee for use of land for military training.

JB: In some cases, the military leases land from the state for training; long-term lease. But do not think there is any payment for water activities.

TWK: This is not a payment for water activities. You said you need a right of entry. Not clear why this is under OCCL (*Office of Conservation and Coastal Lands*). If you need a right of entry that is land division not OCCL. If it is OCCL you are stating you are triggering 183. I think we put it in the letter, you haven't said anything about needing a CDUP (*Conservation District Use Permit*) and you are proposing land-based activities in multiple areas that are conservation lands which would require approval from OCCL, which is your accepting authority. What are you seeking?

JB: We are working with the OCCL and they will work with the land division about issuing rights of entry.

TWK: That's not how it works. I've done this for 20 yrs. If you are seeking right of entry and not triggering 183, the proper entity is land division, not OCCL. If you are using harbors, that's DOBOR (*Division of Boating and Ocean Recreation*). Not sure I can get to a higher level of concern. You do not understand the different regulations that are in play, and have not answered my previous questions. I will follow up with an email.

MP: Regarding the question about foreign entities training. On page 1-1, purpose of the action, training could occur with other US military units for special operations training.

LB: This is a big document, with many layers of jurisdictional responsibilities, it's complex. You are doing hundreds of actions and you are trying to cover it all in the EA. Would you have to do a Programmatic Agreement?

TWK: This should have been a Programmatic EA. They may need to do a PA under 106. It's kind of a mess.

MA: It should have been an EIS. I don't know how they can say there will be no significance. Seems like a forgone conclusion that you are finalizing the EA and issuing a FONSI. You need to submit an EIS.

MP: The proposed activities are similar to those that already occur in the area: swimming and diving. Not introducing new elements. Sonar on the submersible is similar to that found on a fishing boat – fish finder.

MaPo: Small ship would be used to launch the vehicle.

MP: It's about 200-300 ft in length and would be several miles offshore. Purpose of the ship is so that launching only occurs in the water and no need to fly in or use land for launching submersible. In addition, the ship has a diving chamber in case there an emergency with a diver and they need to be taken to a dive chamber quickly.

CWO EA: The main activities that the trainees will be conducting are similar to those activities that tourists do every day around Molokai. No weapons.

MA: You are compartmentalizing the activities and conducting activities on many islands. You can't say it's negligible and issue a FONSI. It's disingenuous.

LB: Replying to the statement that you are doing the same things that are currently happening around the island. In the BMPs of the EA, for swimmer/diver, jet skis will be on site to provide safety coverage. Jet skis are frowned upon, and rarely used around Molokai. Jet skis impact fishing areas. They are not used in the areas you are proposing. Regarding BMPs and what will be done regarding ESA-listed species. Keep distance and have a marine mammal observer. You state that the marine mammal observer will make a determination as to whether a proposed activity will affect a species. With a document this big and everything is thrown into it, this is a concern. Fire rescue has jet skis, but no one else.

MP: Each vessel will have a person trained in marine mammal observation. Jet skis will be used only in an emergency.

MA: The fact that endangered species may be affected, this is a significance criteria and triggers an EIS.

TWK: Give you some advice. This call did not go well. You have some excellent people at the Navy who are excellent and should be involved. Kaipō Perez – excellent, PhD in biology and very good with community. Have a conversation with him. Also recommend Jeff Pantaleo. Outstanding archaeologist in Hawaii for 30 yrs, is outstanding, and knows the state and federal laws. You need to go back to drawing board and map out your requirements, why taking the steps, and what is entitlement process. This is the most convoluted EA I have ever seen in 20 yrs. Navy typically does better documents than this and I am surprised and disappointed. Decide your direction. I will communicate this out to the people I will brief about this call.

MP: We are working with Kaipō Perez and Jeff Pantaleo and they are heavily involved in this process.

TWK: I would recommend having them on this call. Many of the questions we had could have been addressed by them. Recommend having them on future calls.

JB: Getting to the end of the call. We have a lot of homework to do. Thanks for your time.

KRF: Are we getting a copy of the notes?

JB: We will provide a response to your comment letters. We will update with the new information and all will go into the Final EA.

KRF: When will be the next meeting? Requesting a copy of the notes for all participants.

SK: At the beginning of the call, you stated that if we needed additional time that we could schedule another time to address further issues and provide clarification. I don't think this call is completed, and we seem to be putting an end to it. What about your comments about continuing at another time?

CR: Let us know what time is good.

MP: Will Tue at 2:30 work?

SK: You need to ask all the participants.

MA: If we meet again, there needs to be a response to the questions we asked today. There needs to be evidence of corrective actions that shows you have taken our comments into consideration, you've addressed the issues, and you will bring further experts to the next meeting. Don't agree that this will just be included in the Final EA. That invalidates everything we have said. Need a follow-up email listing the concerns with a list of action items for next meeting. Bring in the people that can help answer the questions. Bring in interested parties.

RS: It will take us some time to compile the notes, compile the questions that need to be answered, and to provide answers. We need some time to digest your concerns and have responses prepared so that we are more informative during another meeting. Once we compile the notes and action items, we will send those out and then request a time and date to set up another meeting. Will that work for everyone?

MA, LB, SK: Yes, thank you.

Aloha.

Response to Questions

Follow-up answers to some of the questions asked during the phone conference.

Q7. MA: Do these activities include sonar, what exactly do the special ops activities entail?

Navy Response: Submersibles use a sonar device to report depths to aid in navigation and to detect and avoid marine species during a training activity. These devices have similar specifications to commercially available “fish finders” and other hand-held sonar devices. A complete summary of the proposed training activities is provided in Chapter 2 of the 2018 Draft EA.

Q8. MA: Two, I would like a briefing with the Humpback Whale Sanctuary Advisory Council because you have not consulted with us at all. We are making a formal request that the Navy makes a presentation to the Council because you are within the sanctuary waters.

Navy Response: The following text has been added to the Final EA: All of the military activities the Navy proposes to be conducted in the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final EIS/Management Plan for the Sanctuary, which under the Hawaiian Islands Humpback Whale National Marine Sanctuary regulations do not require permits or further consultation under section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The activities proposed in the EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 Hawaii-Southern California Training and Testing Final EISs/OEISs and, therefore, consultation is not required.

Q9. TKW: What are you considering this consultation for? An EA does not require consultation. Is this 6E, 106, or preparing for something else? What legal authority is this consultation for?

Navy Response: The intent of the calls was to follow-up with stakeholders, NHOs, and interested parties that provided comments on the Draft EA and these discussions will support 6E consultations.

Q10. TKW: If this is consultation under 6E, then you have made determination that there are significant sites under criterion E. Has that determination been made?

Navy Response: The Navy is reaching out to Molokai representatives and residents regarding their comments on the November 2018 Draft EA for NSO Training in Hawaii and to see if there are any additional questions or concerns regarding cultural resources. Following completion of the EA under HEPA, appropriate significant assessments will be undertaken when 6E consultations are conducted as part of the right-of-entry and/or real estate agreements process, including consultation with ethnic organizations or members of the ethnic group for whom some of the historic properties may have significance under criterion “e” to seek their views on the significance evaluations.

Q11. CS: In the event you don’t follow through what you agreed to do, will there be a penalty or violation imposed on you?

Navy Response: If the Navy does not follow what it has agreed to do in the Final EA, and there are adverse impacts to historic properties, then the Navy is required to inform the Hawaii SHPO; the Navy would work with the SHPO to determine appropriate mitigations to resolve the adverse effect.

Q12. TKW: What is the purpose of this meeting, what box are you checking off when meeting with us, and when do you plan on having a meeting with the community?

LB: What is the purpose of today?

Navy Response: See notes for Q3.

Items to be provided to the Navy from Molokai representatives:

3. Complete list of individuals that were on the call and their affiliations so that we can accurately reflect attendance in the project record.
4. T. Kehaulani Watson: You do not understand the different regulations that are in play, and have not answered my previous questions. I will follow up with an email.

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Thursday, October 22, 2020

Time: 1100-1230 (Hawaii time)

Location: Teleconference

ATTENDEES

NAME*	ORGANIZATION*
MOLOKAI REPRESENTATIVES	
L. Buchanan (LB)	Molokai Aha Kiole
T. Kehaulani Watson (TKW), Vice President	‘Aina Momona
M. Poepoe (MPo)	
P. Nihipali (PN)	
C. Schnackenberg (CS)	Ahonui Homestead Association
NAVY REPRESENTATIVES	
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
CWO-4 E. Alvarado (EA), SEAL Training Officer	Naval Special Warfare Group THREE
J. Bigay (JB), PM and NEPA Planner	NAVFAC Pacific
C. Rasmussen (CR), Archaeologist	NAVFAC Pacific
J. Pantaleo (JP), Acting Cultural Resources Manager	NAVFAC Hawaii
R. Spaulding (RS), PM	ManTech International Corp.

Notes: *NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager; SEAL = Sea, Air, and Land.

Purpose

The purpose of the call is to follow-up with Molokai representatives and residents regarding their initial comments on the November 2018 Draft EA for NSO Training in Hawaii, and to continue the discussions that were started in our August 13 teleconference. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

MP: Who joined?

MPo: Hi this is Mahina Poepoe again.

JB: Other than Kunani is there anyone else on the line from Molokai?

LB: This is Lori Buchanan.

PN: This is Punani Nihipali.

TKW: And this is Trisha Kehaulani Watson, uncle Walter asked me to be here for ‘Aina Momona.

JB: Aloha, welcome.

MPo: Hello this is Mahina again letting everyone know that I am recording or attempting to record and if anyone has an issue with that then you can let me know and I will stop.

LB: Hi John this is Lori from Molokai. We waiting for anybody else? I think from our side we have Trisha representing Walter and myself and Mahina, Cora, I don't know if Cora is joining us, if Cora is on the phone. Punani, and then from your side. Keani Rawlins-Fernandez is in another meeting for the county. She cannot join until noon but I told her we might be done, I don't know.

JB: Alright then if we are all ready to go, we can start and if anyone joins us along the way that's fine. Alright I will start with the introductions from our side, most of the people you've meet from the previous call. I will start with myself, John Bigay, from Naval Facilities Engineering Command Pacific at Pearl Harbor. I am the NEPA planner for this project, NEPA is the National Environmental Policy Act, and my job is to support getting the Environmental Assessment completed along with assistance from our contractor and that is ManTech International and that is represented by Rick Spaulding. He is the project manager for ManTech on this project and a senior wildlife biologist. Are you there Rick?

RS: Aloha.

JB: We have Margherita Parrent she is the project manager and Deputy Facilities Director and Environmental Coordinator for Naval Special Warfare Group Three.

MP: Aloha everyone and thank you for joining us.

JB: And also we have Coral Rasmussen from NAVFAC Pacific, Archeologist.

CR: Hi, welcome.

JB: And archaeologist Jeff Pantaleo from NAVFAC Hawaii

JP: Aloha everybody, thank you for joining us today.

JB: And CWO Alvarado, are you on the line.

MP: He's not on the line yet, he is stuck in a meeting and trying to desperately join us.

JB: He is from the Navy SEALs as well, so hopefully he will be able to join us. Robert Rowland are you on the line? I think Robert had another phone call that came up in the meantime. He is assistant counsel from Commander Navy Region Hawaii. And did I miss anyone who is online on the Navy's side? Okay. The reason for our call is to make sure that everyone on the previous call got a chance to review the minutes that we sent out and the comments, and we answered some of the comments that were brought up during that phone call on the minutes that we sent out. And make sure that there is, there are no further questions on that and that everybody understands them. Any questions or comments? And before we go into that, just make sure we have the listening right for who's on the line so that's Mahina Poepoe, Punani Nihipali, Lori Buchanan, and Trisha Watson. Anyone else joining us from the Molokai side? Okay. I would like to let Jeff Pantaleo talk about his role on this project. Jeff, the archaeologist for NAVFAC Hawaii, since he was asked about on the last phone call. Jeff has another commitment so I want to let him go first and introduce and give his role in this. Jeff?

LB: Hey John, before we move to Jeff. Hi John this is Lori from Molokai, before we move to Jeff you brought up the minutes of the meeting we had on August 13th and asked if anybody had any questions. I do have a comment for the record. For the record, I believe we asked if the discussion was being recorded, you said no, you said you were taking notes. From the notes of the meeting I just wanted to comment that I don't recall some of the stuff that you added into there was not discussed in that meeting such as the notes about, subsequent to the discussion it was determined. I don't recall you stating that but it's in the minutes now. That's why I asked Mahina to take a recording of the meeting because I don't want to belabor the minutes right now of the August meeting. Just to state on the record that I did not concur with some of the discussion maybe because I couldn't remember and it's not verbatim. I think that from today on you guys should decide if you are going to record the meetings or do them verbatim and if not, we are recording the meeting for our purposes as well. That's it, thank you.

JB: Okay quick response to that, Rick, you wanted to respond?

RS: Yeah, I was the notetaker and I am fairly good at taking shorthand and am fairly thorough in terms of my notes but just an FYI the subsequent discussion was included after the fact that's why it is in parenthesis and italics. It was determined after the call that we weren't consulting under 6E so I just want to make that clear in those instances where 6E was mentioned during the call. It was after the meeting we acknowledged that and it's not reflected that that was said during the meeting. It was included and inserted after the meeting and that's why it's stated as such "subsequent to the meeting" that was added.

LB: Okay, is it safe to assume the notes and italics then throughout the document are of the same caveat? Because I notice in other areas they're the same notes.

RS: No, it's just the two instances where it says the subsequent to the meeting and its only related to the two or three instances where we mention 6E. Otherwise everything else is just in those instances only where they are in parenthesis. Everything else is from the actual meeting.

LB: Okay, thank you.

TKW: I really do want to get to Jeff and I agree with Auntie Lori, I don't want to belabor this but what was the purpose of last meeting then?

JB: The purpose of what?

TKW: The last meeting. It's in here that it was a 6E consultation, so then what was it if it wasn't a 6E consultation.

JB: It was consultation under HEPA, the state's Environmental Protection Act so we were actually consulting under HEPA.

TKW: Okay let's get to Jeff because I am very excited to hear from Jeff because I am hoping he can shed light on, well everything.

JP: Okay I will try to do that. Thank you everybody for being on this call today it's important for us to continue our consultation. My role, I am the Acting Cultural Resources Manager for Navy Region Hawaii. I work with NAVFAC Hawaii on environmental planning and in fact I am the acting supervisor for a while too, so I have been kinda busy, I apologize for having to leave early. My role is cultural resources support and working with Coral Rasmussen closely on this project. Just a little background, I have been working with Coral Rasmussen for over 30 years which is amazing to think about. I've seen her on many projects as a principal investigator, supervisor so I know the work she does and I have all the confidence in her ability. As the one who oversees the cultural resources, if I had any doubts or questions, I would have brought them up earlier. But I have just a lot of confidence in her abilities so if you have any questions please let her know, and her and I talk about these issues and try to get back to you as fast as we can. I just wanted to give you a little background to that. If anybody has any questions for me know I would be happy to answer them now could also answer emails too.

TKW: I am trying to look through all of this and I don't know Coral but I know you're a wonderful archaeologist and you've done this in Hawaii for ages. And I don't mean that in a negative way, sorry, that came out wrong. Two things, one it doesn't look like there was consultation on 106. If this is a joint NEPA-HEPA document, I have questions about the 800.4 identification requirements under 106 specifically. So that's why I think when I said there was 6E, which I do know that you only go into consultation because you've identified there are historic properties that are significant under criterion E. I don't quite understand where we are in the process and also the cultural impact assessment for the Act 50 stuff doesn't seem to have been included in the HEPA document. So that's what I am hoping you can untangle is as you all know there's usually like 5 different, there's NEPA, HEPA, 6E, 106, and Act 50 all kind of converge on projects like these. I am hoping you can shed light on untangling it because that certainly didn't happen last time.

JP: Okay maybe Coral could help answer that question too. You know we do 106 consultation initially, and because we are not working on federal property, we are working on private and state we can do the section 6E process so there were actually 2 consultations being conducted for this project so we could cover both the federal land and the private and state. Does that answer that question?

TKW: I think so but I know our NHO came in specifically asked to come in as part of the 106, so that's why we thought the last meeting was 106. I wasn't too clear with you what that formal consultation process will look like. Is that a separate set of meetings because there are certainly historic properties, we believe are eligible for the National Register that we would want to discuss.

JP: Okay yeah. Coral, we did the 106 consultation, that is correct, right?

CR: We did because that's Section 106 is different than the 6E. Under 106 is in regards to the impact the impacts that you may have on the historic properties. 6E is a little different in this case 6E is related to those real estate agreements. Although the 106 is very general, the 6E will be continuing consultation with people as we identify the places in more detail.

TKW: I guess that's where I disagree with this situation. I understand the difference like with 6e this is largely just a real estate transaction. But I can tell you from other DoD real estate-related projects I am currently working on, the position of Allan Downer⁸, is that they haven't quite figured out what that looks like. Again, I don't know how Section 106 consultation is complete or even started if you haven't sent out consultation. So, my question is, have you sent out consultation initiation letters, have you and I want to go specifically to 800.4. I think on the last call we also brought up sites that we have questions as to whether or not they will be impacted. That our historic properties that are additionally culturally significant and we

⁸ Hawaii State Historic Preservation Officer

believe eligible for the National Register. So, I have not seen a property identification report anywhere but I think that's a lot of the crux of it, that people are very concerned about properties, specifically on Molokai in this case, that are historic, and culturally significant and in my opinion are eligible and may be impacted. So, I don't believe that consultation has happened and if it has, I would like, I would just like more information on that.

CR: Our footprint when we worked with the SHPO, our footprint was actually quite small, much smaller than what was indicated in the EA for security reasons. And because of that footprint the areas that the training is proposed in was not in those areas identified as potential historic properties. We realize that the areas that is purple in the EA has numerous properties that include such things as fish ponds and other cultural areas, such as used for gathering and such, but the footprint of the actual undertaking is not within those areas.

TKW: Is there a letter? So, I think, I am trying to understand what you think your APE is. Because the map you have here has quite a large APE. So that's been changed and again I am happy to call Allan. I think you still have an obligation to consult on your APE with people who identify themselves as wanting to be consulting parties, which we did in writing after the EA came out which was a very long time ago, and I don't believe we were the only entity that did that.

CR: And we're happy to continue consultation and are listening to any concerns that you may have.

TKW: I am looking at page 3-124 and it says, one there is no map of the APE, I mean there might be I am just trying to scroll this quickly as I am talking to you. But it says it is quite a large area, that's what it implies so there is nothing here to indicate that you've indicated an APE under 106 and its different than the area studied than what you provide in the rest of the EA.

MP: I don't know, forgive me I am going to try to answer this as best as I can I am still learning and Coral is my SME and Jeff are explaining to me so this is what I understand so I may be wrong but this is – and everyone correct me so we started out with this APE this large APE because we didn't know. If we were to go with just x marks the spot, this is where we want to train it would be looked at as though what we were doing pre-decisional – we had already determined where we were going to train and we were going to drive our analysis to that. We can't do that, right, so we looked at this area and then it's hard to analyze 10 feet of wave action, you just can't do that so we say we are going to look at this whole area and analysis will show us in this area where we could possibly train. So, we did that and the 2 areas that we are interested in are Hale O Lono Harbor and Kaunakakai and those are the only 2 areas that we are interested. That after all the analysis came out, we thought oh maybe these are possible provided that we go through the consultations, provided we go through 6E, provided we get approval from the property owners, provided we get all this but were looking at this and were saying okay these are the areas – but we couldn't start off with just those areas to begin with. Additionally, a large enough area, let's say, for example, we do get approval to train in these two areas and somewhere along the line the community comes back and says, you know guys you promised us you would do this and you didn't, you did this, this, and this and we don't really want you here because you didn't live up to your agreements. Then we would go back to the purple area and see is there anywhere else the analysis would support, and again we would have to do the 6E and all the consultations required under the state process, would support training so there is a little bit of flexibility of moving back and forth between the purple lines, purple area, if there is some areas within that purple area that meet the criteria that we can train in without impacting anything, you know. So that's what I understand. So right now we are just looking at 2 areas within that whole purple, but we started out with a broad swath because we weren't sure what the analysis would show.

CR: It was important for the Navy SEALs, in addition to avoid areas that they thought could potentially be historic property and that had a lot to do with limiting their training areas.

MP: Does that help Kehau?

TKW: A little bit. A little bit. But it still sounds like that entire swath is an area of potential affect and that's why the word "potential" is in there we don't necessarily know where within the area there may be impacts so I guess I would like to see the letter where you folks identified where the APE to the SHPO and I would like to see the SHPO's concurring so I would like to see specifically those letters. And then I would really recommend pulling 106 out of this process like where we are talking about the HEPA document and

walking through a 106 consultation. So again, I don't know if 106 letters were sent out, the standard is you go to the DOI list and send out letters and we submit it through the process anyways but it really sounds like 800.4 hasn't like [INAUDIBLE]. Hale O Lono is I think register eligible, but also on top of it, it's important to have consultation so you folks can understand the importance of it for the paddlers or for divers. I guess and I mean I don't want us to take up too much time having that discussion here, but I am recommending a separate section 106 process with the Navy. And if we want to put 6E and Act 50 there as well, I think that's fine, but I think that's a separate discussion from NEPA and HEPA it sounds like.

MP: My limited understanding of this is, and I am learning as I go along, and I want to do right by everyone. I am a Hawaii gal so it's important for me that we do right by my community and the people I work for, which have quite a few people from Hawaii, we recruit heavily from Hawaii because they're water-men, they have a passion for the water, successfully recruit. My understanding is that we will, when required we will come back under the 6E process consultation that you're requesting that's my understanding.

TKW: What do you mean when required, its already required you've triggered both statutes.

MP: Right, but my understanding is that we are going to, when we start to put in the applications under the 6E process the property owner is going to direct us what to do which will include consultation.

TKW: Can we have a call with Allan Downer and Susan Lebo? I feel like there is, I am really baffled as to why you folks are resisting certain consultation under section 106. We indicate in the EA that section 106 applies, and it sounds like there is resistance to this that I am not understanding. I can go ask SHPD for the letters, I would like you folks to send me those 2 letters I requested. One, I want to see your letter to the SHPO that identifies your APE and then I would like to see the SHPO concur. And then I think we can go from there. But I'll give Allan a call after this and see if we can't set up a time to clear some of this up with the SHPO. Because I don't understand why you folks don't just, it's a simple meeting to talk about the historic properties that you guys have identified, and to see if there are additional properties that we would like to identify. I am not understanding why there is resistance to having that meeting where you've clearly triggered 106.

LB: This is Auntie Lori Buchanan, I wanted to respond to Margherita's comments. I don't think, I mean I know as a native Hawaiian my rights and privileges and my due process on the law and I don't believe what you just described is legal and correct and Trisha, and I agree 100% with Trisha. I am more of a grass roots practitioner in Maki'elana(?), but I know that you cannot start training in our harbors and then wait for the public to complain and then start a process to mitigate those concerns. That's putting the cart before the horse. You no can do this.

MP: No, no, no, I agree. What I meant was, let's say we had gone through all of the consultations and we received permissions to train in the harbors, right, I was explaining why the large purple swaths [INAUDIBLE]. Let's say we completed everything and we were all good to go and, you know, with the community support and everyone, and we were able to train in those 2 harbors. Let's say further along the line after training there for a couple of years, you discovered or we inadvertently didn't do something that we promised to do in the agreement, whatever was written into the agreement, right, for the use of the harbor. And you would come back to me and you would say hey, you know what Margherita, you guys said you weren't going to do this but you didn't, you violated this and this isn't going to work. We would then pull out from utilizing that harbor right and we would go back within the purple areas to see if there is any other palace that would work for us and for you. So, does that make sense?

LB: I hear what you're saying, I understand, it makes sense, but in our experience it doesn't work. And I am going to tell you that my community is adamantly opposed to this undertaking and this is the reason why we are on the phone with you folks today is so our comments can be heard. We've already provided comments to SHPO in opposition back to 2018, and I can prove that my community is adamantly opposed to your proposed undertaking and so this is why and I really am thankful for Trisha being a process person. I mean that's our right as native Hawaiians to have a process, and that is why we are asking and try to understand from you folks. Because let me tell you why, it is next to impossible to go back with the Department of Defense, military, any branch and reopen consultation. I have tried it with Marine Corps Base Hawaii and light-attack helicopters and Ospreys and I have not been successful for the past 6 years in

requesting to reopen for impacts. And so, it's going to be hard for me, a hard sell for me, to believe that you guys would go back and actually open a consultation. But thank you.

MP: I hear you and I hear you loud and clear. As far as I know, because I am learning this process as well, is that when I receive a right-of-entry, an agreement, written into the agreement, the property owner says they have the right to rescind that agreement with a 30-day notice at any time.

LB: Okay so DLNR, I am sorry. DLNR being the owner having the trust responsibilities for me, the actual owner, the beneficiary of the land that is being held in trust by the Department of Land and Natural Resources. Which for that case is the preservation officer that signs out on all the rights of entry is reluctant to also go back and re-open discussion. So that's how come I appreciate your saying that it's going to go back to SHPD and SHPO, because the harbor, it belongs to us, to me, it's just being held in trust and managed by the Department of Land and Natural Resources. That's why I have a right to due process. But thank you I will let somebody else jump on, thank you.

CS: Aloha, thank you Lori this is Cora Schnackenberg. I represent Ahonui Homestead Association. I totally agree with Lori Buchanan 100% and also the other woman that was speaking earlier. I would agree that a consultation through the DOI, a separate to 106, I really believe that because you are with the military you are obligated by the federal law to include the Native Hawaiian Organization. And I believe that the DOI should be a part of this process as well. For you to say oh to put this in an interim and then if by any chance you run into something that you both failed what you were obligated to do, that's not [INAUDIBLE] in itself so you invite [INAUDIBLE] at the very get go if you think you can do something and you never do your side of your obligation, you're already in violation. I totally agree and I am very passionate for our people and yes, the community is speaking out loud and clear. So mahalo, thank you next person.

CR: I am going to suggest that John send the Section 106 letter the concurrence letter and the letter initiating consultation to the team. For those who are available Tuesday afternoon I will be happy to have a Section 106 consultation and talk about historic properties with those who are available.

CS: I'll be on, thank you.

CR: And just the historic properties on Molokai at this point because if we were to talk about everything... 1400, 2 o'clock work for everybody? I will send out the invite.

CS: You know I prefer that you contact DOI to make sure that everybody is on.

CR: For this consultation it's going to be for the folks that are interested on the call that have requested consultation.

LB: I will be traveling on Tuesday October 27 and I cannot make that commitment at this time. Trisha are you still on the call?

TKW: I am Auntie.

LB: Do you have any comments on what you just heard or maybe the Navy...

TKW: I think you guys are agreeing with me so I agree with you back. But I mean I think it needs to be separate and I am unclear as to how they've met 106 and I am looking thru SHPD records at the moment and I'm going to ask SHPD directly for them too. But I think you need to be there Auntie Lori. I am hesitant to, and I agree with Cora as well, I think it should go out to, if they have not sent out section 106 consultation letters to the entire DOI list, there should be consultation initiated with the all the individuals on the DOI list.

CR: There is no requirement under Section 106 to send it out to the entire DOI list. We sent notices in our newspapers and we have fulfilled our requirements in sending out the notices. We realize that we haven't sufficiently consulted with you to find your concerns for section 106. We are going to talk to you to find out if there is any additional information that you may be able to provide but we are not reopening negotiations on Section 106 to DOI ...

...SEVERAL PEOPLE SPEAKING AT ONCE...

CR: Generally, please let me finish, does not generally adversely affect historic properties. We have a determination that there will be no adverse effect to historic properties but we do recognize that you may have additional concerns so we will be talking with you next week. Are you available Thursday afternoon at 2 o'clock next week?

TKW: A couple of things I want to unpack. I am not sure how you have a determination that there is no adverse effect because that's part 800.5 and I am saying there is still at 800.4. Second, you don't have an obligation, but as you know consulting parties can pretty much join at any time and if there's questions on that we can go to ACHP. Third, I'll defer to the people on the call as to their availability, I think they're more important than I am in the mix and I want to make sure that those NHOs, that want to join the process, have every opportunity to do so.

CR: Are people on the call available next week on Thursday?

TKW: Thursday or Tuesday?

CR: You said Tuesday people were not available. Are people available on Thursday?

LB: I am not available because I am in a 106 consultation in with Kalaupapa National Historic Park at 10 AM and in the afternoon the Hawaii Tourism Authority and so if you could do it in between those times. My 106 usually runs from 10 to 12:30, between, if it's at 1 on a Thursday, 1 o'clock I may be able to attend that on Thursday.

CR: Let's make it a 1 o'clock on Thursday.

MP: How about Cora, would you be able to attend?

CS: Yes, I will be there at 1 o'clock on the 29th of October, I am able to make that time.

MP: What about Mahina?

MPo: I should be able to make it.

MP: And Trisha, we can't do it without you, will you be able to join us?

TWK: I can make it, if it's the 29th at 1 I can make it.

LB: Punani is on the call too.

PN: I'll put it on my schedule.

MP: Thank you so much. I really appreciate everyone's kokua in making the meeting, not kokua with our proposal, just to meet with us again next week.

CS: I have one request, could you reach out to put some sort of notice out to native Hawaiian associations. I really feel that they need to know regardless of what your efforts were with the newspaper and DOI has a legit organization. It should be part of this process so letting you know the legit native Hawaiian associations with the DOI, you need to get ahold of them. Thank you.

CR: John why don't we turn the meeting back over to you so you can discuss the HEPA.

JB: Okay thank you. Well I think everybody knows what HEPA is it's the state's process for environmental documentation of projects that are proposed by the state or that use state land. So this is a joint EA under NEPA from the federal side and under HEPA from the state side and we are trying to comply with all the requirements on the state side or HEPA and provide them with our EA, and that their obligation is to determine whether it is a complete EA or that it satisfies all the requirements and they would prepare a document on the finding of no significant impact and publish that along with the Navy's FONSI, finding of no significant impact, and that would end the process. We're not at that point yet. We haven't submitted the EA to the, sorry, we haven't submitted the FONSI to the state yet, that about sums up that process. We don't know how long it will take for them to finish their review of it and back to us, we are hoping it'll be by the end of this year. Anyone else have any comments, any questions.

MPo: I have a list of questions and comments based on the minutes that you sent through but I am thinking I will draft them in an email. Is everyone okay with that instead of staying on the line for another half an hour?

JB: That's very good and yes, we request that if you have any further comments on those notes from the last meeting send them to my email address, they will become part of the record.

MPo: Will they be replied to before the final is issued or will they just be put on record?

JB: Generally, we get comments for the public for an EA and they become part of the record. I don't know how many rounds...

MPo: Maybe I can ask all my questions now, that may be better.

MP: How quickly can you get these to us? If you can get them to us quickly, perhaps we'll be able to go through them and answer them by Thursday when we meet again. Would that work? Would you be able to get them to us today or tomorrow?

MPo: I can get it to you today I just want to make sure that I get answers the same way that I would get answers if I were to talk them out right now.

MP: If you can get it to us today then we will try to answer them the best we can and have answers for you before we meet Thursday. And again, we don't need too many open unended questions.

MPo: Okay I'll do that. Just an end, a comment based on the conversation is that I think it's important for everybody on the call to remember that while we are segmenting on Molokai, the Molokai-specific parts, that this is still only a component of the larger state-wide undertaking. And as specific to Molokai we're being we should also keep in our minds the wider cumulative impact of the totality of the proposal. I think it's a frustrating part of the process and the consultation because we continuously try to fit ourselves into the boxes that you give us. It's really dislocated and piecemeal and compartmentalized in like a western concept and foreign designed way that doesn't translate or easily accommodate our unique world view, where the entirety of nature is sacred. And in return the entirety of nature we consider a cultural or historic site and what you or the processes often look for physical tangible coordinated sites, such as like the fish pond because you can see them and that's something you can grasp. For us, like the entire seascape and the ocean and the entire realm is a realm of spirituality and it's sacred and would be considered a cultural and historic site to us. I think that's where a big point of frustration comes in for me.

MP: Mahina, I want you to know I met with Auntie Kehau Lum and I've meet with Brian Keaulana and I've met with William Aila so far. And actually it was Auntie Kehau Lum that suggested that we incorporate, and I don't know, I am doing some research because I want to do this right, a moment of respect and silence before we train, go into the water. I'm working with several people to determine how I can translate that so I can put it into the training profile so if and when we do get approval to train, the guys before they step into the water, take that moment of silence and respect and gratitude and humility to be able to, before they enter the water. They do it already because many of them are from Hawaii and it is a natural thing to do for them. But we want to be able to explain the significance of this so I want to try to - anyway I am working on that and I don't know if you needed to know that but I just wanted to share with you this thing.

PN: I have a comment similar. I noticed that you have all these safety vessels, harbor masters, law enforcement, safety officers, boaters, etc. Do you have a community cultural monitor? Maybe that person might be what you're looking for, that would be uncompromised. Someone that is not with the state, someone that is not paid by the state, but also may be compensated for their time as a community person. They might be able to provide that, that moment of silence for you as well with the proper protocols.

MP: Let me see if I understand you correctly. What you're asking is while we do, before we do the training, we have someone from the community, a cultural resources person from the community be there with the person to do the, before the guys go and do their training. Is that it?

PN: Well in one of the, I read your last discussion on the 13 of August and I saw all kinds of people that will be in the water, safety vessels, in that discussion there were harbor master, local law enforcement, and I was just wondering maybe we should have a community cultural monitor on site as well. In case they not recognize or they may be compromised because of their position, that we have someone there. Could be a fisherman who knows the area who says wait, they went off, there's an area there that they shouldn't be where they are. Just to satisfy the community's concerns.

MP: I want to do right by everyone, I want to do right by my community, my Hawaiian community, I want to do right by my work community too, I am trying to do this fringe, right. If it would be possible for you, or someone who has that knowledge, to share with us within these two proposed areas I don't know if I would ever get them but Kaunakakai harbor and Hale O Lono, where this is to make sure that we avoid that. Our challenge is that the training will occur usually between 10 and 2 in the morning or 4 in the morning and maybe 2 to 4 times a year, we don't expect it to be more than that even though our EA says up to 10 at one spot, and there may be years that we don't show up at all. But our challenge is I am not to compromise the security of the operations security of the field. How do I, how do we get the training for the field, how do we get the training to proceed and without notifying all of the community. That makes it, we have a risk there that we are trying to mitigate. I hear you and want to try to incorporate what you're saying somehow and I am thinking if you could provide us information that would be great and we would

be sure to avoid the areas because that's part of their training, it would be a wonderful addition to their training scenario. It's a small group and they pride themselves on being, you know, being nimble enough to move 10 feet to the right and 15 feet to the left so we could easily incorporate that into the training scenario and it would be a benefit for them as well.

PN: Yeah, I think as part of your process you should put that out to the community. That would be much fairer. I am suggesting that someone from the community who is much more familiar than I am. Just put it out there, just like how you have everybody else who's going to be on board that you should have somebody that is qualified enough that know the area just like you have other people involved, harbor master, law enforcement. I am not looking for that job, I'm saying there should be someone that is a monitor from the community and not compromised as a state worker or on the payroll so to speak, but also compensate them too and they gotta be there. And they could also possibly also fit the - have the credentials of a cultural person that will be able to maybe initiate the process of silence or whoever. You have time from now to then to put this in the part of the concerns of the community, not necessarily me, but you know just someone from the community because if you have someone else to harbor masters, safety officers, or local law enforcement, medical officers, a monitor, cultural monitor.

JP: Thank you Punani for mentioning that. We always have cultural monitors for monitoring our projects such as the fish pond and another site that we work on out in Kaihalulu Bay and we always try to use their input for anything we are doing and I think this is a great idea, I am not sure about the compensation. Usually we just have, you know, a volunteer, we could look at that because we don't also want to make that seem like the Navy is paying for somebody to do that, that could also be looked on negatively too.

PN: Who is paying for the harbor master, or the law enforcement, or the medical officer, and the safety officer.

JP: No, I agree and you know I can't answer that question. It's not my area but I totally support having one or multiple cultural monitors giving us advice along the way and something that the Navy always does when I am working on projects. I think we could continue talking about that as the time comes but I appreciate you bringing this up though, thank you.

PN: Yep.

MPo: I have decided I would like to ask a couple questions just to get them on the record and for everyone else on the call to be able to hear them. Most of them are based on the notes that were sent. If this group that were talking to today is not authorized to make decisions or changes, then who is? And how realistic or likely is it that changes will be made based on these additional comments from us?

MP: What I understand is that if our notes are incorrect please, please for the meeting, the previous meeting, we need to correct them and we can correct them together.

MPo: It's a question based on statement that this group is not authorized to make decisions or changes to the document.

MP: These are notes, this is different, these are notes that we take and you know with notes we all hear different things or may have forgotten...

MPo: Maybe they're not based on the notes maybe they're just questions. You know I read the notes and they elicited questions, but I am going to ask them anyway on the record. Yeah, so if there is no training on the land or air does this mean that there is also no land or air support and with the mention of the harbormaster and local law enforcement as well, are these not considered land support or associated land-based activities?

MP: There is no air or land training.

MPo: Support. Training lists the support side and training side are different, but there is support.

MP: Other than the phone call to the harbor master or whatever is written into the agreement as agreed to by the property owner, we, in my limited understanding because I don't know yet we haven't come to that point, typically the harbor master's staff would want to be given a notice that were coming in and working to make sure that we are not disrupting anything you know and that's usually the bulk of the support that we get. We have everything else on those two small RHIBs or 25-foot little boats that Punani mentioned. We have people there, we have our medics, we have our dive supervisor, our look out, our marine mammal

lookout, and those 2 boats, one that, we have all the support staff on there. We don't anticipate having the need for any support staff on land.

CWO EA: This is Chief Warrant Officer Alvarado, I am finally logged in. To also jump on to what you said, what miss Parent said is absolutely correct. At no time do we expect to have any physical presence on land.

MPo: Okay the electric-powered submersible with the fish finder type sonar. I recommend removing this completely. The question after that is, would removing that remove the need for the 100 to 300-foot ship?

CWO EA: So right now, I am assuming you are referring to the passive sonar system on the small submersible. It is passive reflective that of a fish finder. Is that what you're referring to?

MPo: Yeah, I am just referring to the activity of using the submersible in its entirety.

CWO EA: The submersible would move from the 300-foot vessel, move essentially outside of the water column, in this case any beach head, as it came closer it would eventually drop off the swimmers that are within the vessel. It would be typically the swimmers, or in this case divers, that would make their way in and around the pier system as to not compromise the small submersible. As mentioned earlier, that small submersible will be always accompanied with two safety craft at all times. At no point in the training, in the area of Molokai, do our divers intend to come anywhere near the beaches, but stay fully around those pier systems. Does that help explain it?

MPo: Yes, my recommendation to you was just to remove the use of the submersible in the proposal.

-----Recording ends; the remainder of the meeting is based on notes taken by the Navy participants-----

MPo: How far out does the larger vessel stay? How many miles off of Molokai?

CWO EA: Typically, it will be in the middle of the channel if not further out.

MPo: How far?

CWO EA: At the channel, around 4-5 miles.

MPo: Are you going to be training during whale season?

CWO EA: We will not be training at any point that disrupts the local community or the whales. If we can train, we first go thru the experts, marine biologists to determine when we can be there. They will tell us the season. No, we will not be training when there is whale activity.

MPo: When you do those consultations, you should include a cultural expert.

MP: Jeff Pantaleo is our cultural resources expert and will prepare a brief for the training and update as needed so we are OK with the training.

MPo: We also prefer that there be separate monitors for each place that know the area and not one person for all training areas.

MP: Yes, that is a good idea. Jeff can you speak to that?

JP: Yes, when we consult we won't just call once or twice; we will be in constant communication during training and that includes anyone on Molokai that wants to be part of the process and continued conversation with the Navy. I'll be the POC for this and you can let me know who to consult with for the various areas, that has the expertise for each area.

MP: we rely on Jeff to reach out to the proper community members and ensure that we are training in the way we said we would and we know what needs to be done before we go into an area for training.

TKW: Jeff are you considering an MOA under 106 that would include all of the commitments by the Navy that would be more binding than what we are being told on the phone call?

JP: If the result of the consultation is that we need to do an MOA, we will do that.

TKW: OK. One additional thing. You understand that there is a difference between traditional customary practices and tangible cultural resources. What will the final CIA document look like with regards to the inventory assessment given it seems like everything is activity-based.

JP: can you repeat the question.

TKW: It seems that there might not be a CIA, so how do you plan to identify all the traditional customary practices?

JP: at this point we would consult with the local cultural experts to determine if there are any TCPs or traditional cultural places within the APE.

TKW: But it's also practices not just properties.

JP: Yes.

TKW: I would recommend that this would be an important item to help the community feel better if you went through that analysis.

JP: I agree, thank you.

MPo: Further questions on the training. It was not clarified if the support vessels would be armed.

CWO EA: None of the trainees or support staff will be armed.

MPo: Will the vessels themselves be armed?

CWO EA: No, the support vessel will not be armed. It is not a typical Navy ship. It's more like a tug, a personnel transport vessel.

MPo: You state that activities would occur between sunset and sunrise. How will you be able to detect marine mammals or sea turtles at night?

CWO EA: We have the ability to detect heat signatures and we have night vision goggles.

MPo: Since your activities will be at night, what type of lighting will be used by the trainees, support vessels, and submersible? This is in reference to the potential to disorient birds and other wildlife.

CWO EA: The support vessel is well lit. The safety vessels are lit with dive lights and are reflective of what you would see on a fishing vessel. The submersible will have a white light. As trainees exit the submersible they will have a buoy about the size of a Gatorade bottle that has a chemlight that is attached to the trainee. Similar to the lightsticks that kids use during Halloween. Does that answer your question?

MPo: Yes, thank you. That is all the questions I have.

PN: I have a question. Will the law enforcement personnel be armed?

CWO EA: I can't speak to the law enforcement. You can speak to the current law enforcement and what they are allowed to carry.

PN: I just want to be clear if the training includes armed personnel or not. If there are people in the water, how will you force them to get out of the water?

MP: We would not force anyone out of the water.

PN: I just read the comments that the training would halted until fishermen leave the area.

CWO EA: We have the ability to recall our trainees at any time. Intent is to not be impactful, and if need be we will leave the area.

PN: Local law enforcement will not be needed?

CWO EA: No, we give them a courtesy notice to let them know that we will be training around Molokai.

PN: Okay.

MP: Local law enforcement will not police the area. We are just letting them know of our training activities.

CS: Based on the notes from our last meeting, I would still like to know what would happen if the Navy is not keeping their agreement with how the training is being conducted. What penalty would there be?

MP: If we are in violation of the land use permit for our training, then the owner of that property can come back and say we weren't keeping our agreement and they can pull the permit. It is important for us to follow what we said we would do in the permit. Molokai is important to us and we would not wish to violate any agreement.

CS: In our history, the military does not keep their agreements. I just wanted to put that out there.

JB: We have about 10 mins left, does anyone have any last comments?

LB: I want to get back to the Memorandum of Agreement and that the right of entry will be a contract. If there no Programmatic Agreement and only a right of entry with a land owner? If it is only SHPD can do enforcement, what is my due process regarding enforcement of an agreement. I do not understand what the agreement will be. If there is a 106 then there would be a Programmatic Agreement, then if there is an adverse effect, what recourse do I have?

MP: We haven't got there yet. We would have to bring up this comment to DLNR and see how it would be addressed. We don't know at this time.

LB: The one who has to provide the oversight of the training will have to do it on their own time and expense. And Margherita mentioned that she had consulted with William Aila, Brian Keaulana and Aunty Lum. Are you aware of nexus for decision making for Molokai?

MP: We contacted Mr. Aila and Keaulana and Aunty Lum regarding Makaha, Pearl Harbor, and not in reference to Molokai. We sought their input and advice on other areas of the action, not for Molokai.

LB: Thank you. It is important for you to understand our decision making based upon a resource realm.

JB: We thank everyone for your participation. We have a lot of work to do.

MP: We'll meet again next Thu and Coral will send out a meeting invitation.

JB: Thanks again and Aloha!

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII
ENVIRONMENTAL ASSESSMENT (EA)
STAKEHOLDER CONSULTATION MEETING
MEETING NOTES**

Date: Thursday, October 29, 2020

Time: 1300-1430 (Hawaii time)

Location: Teleconference

ATTENDEES

NAME*	ORGANIZATION*
MOLOKAI REPRESENTATIVES	
L. Buchanan (LB)	Molokai Aha Kiole
T.K. Watson (TWK), Vice President	‘Aina Momona
M. Poepoe (MPo)	Molokai resident
P. Nihipali (PN)	Molokai resident
C. Schnackenberg (CS)	Ahonui Homestead Association
K. Rawlins-Fernandez (KRF)	Vice Chair, Maui County Council
K. Opele (KO)	Molokai resident
STATE OF HAWAII	
Stephanie Hacker	State Historic Preservation Division
NAVY REPRESENTATIVES	
M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator	Naval Special Warfare Group THREE
Robert Rowland (RR), Assistant Counsel	Navy Region Hawaii
C. Rasmussen (CR), Archaeologist	NAVFAC Pacific
R. Spaulding (RS), PM	ManTech International Corp.

*Notes: *NAVFAC = Naval Facilities Engineering Command; PM = Project Manager.*

Purpose

The purpose of the call is to follow-up with Molokai representatives and residents regarding their initial comments on the November 2018 Draft EA for NSO Training in Hawaii, and to continue the discussions that were started in our August 13 and October 22 teleconferences. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

CR: Would someone from Molokai like to provide a pule?

...long silence...

CR: If you do not want to provide a pule that's fine. I don't feel qualified to provide that pule.

CS: This is Cora, is everybody ready? Pule kakou. Heavenly Father, we thank you Lord for this day. Thank you for the many blessings, thank you for good health among all of us. Lord we ask that if we share a kanaola we ask that you be in the present. We ask that your love will help us to express ourselves out of love, Lord. We thank you Lord. May you bless our conversation and may you also keep us healthy at the end of our call. And Lord we ask all of this under Jesus Christ, amen.

...several people saying mahalo at once...

CR: Thank you for taking the time out of your day to call in. This call is being conducted because during our section 106 consultation it became aware that we did not receive, that I did not receive your letter, and I really apologize for that. We would like to talk with you about your concerns under section 106. This will be additional information that we will take into consideration as we move forward under section 106. We will do a 6E consultation after this EA is concluded and that will be done in conjunction with a real estate agreement. Since the EA is not completed yet, we are not sure exactly which locations will be finalized for training. At that point that is when we will do our 6E consultation. I'm sure you will be hearing more from us following our 106 addition here. This is really an addendum, it is not re-opening up negotiations under section 106. We are taking more into account as we move forward on our undertaking. I would like to really

quickly allow everybody to know who people are on the line from the Navy, I am Coral Rasmussen. I am the archaeologists supporting the Navy special operations EA. We also have Margherita. She is from Naval Special Operations training. We also have Robert Rowland, he's our legal counsel. And Rick Spaulding, he is our contractor. He is supporting us in every aspect of this initial EA at this point. We have actually had a few different people help us with this undertaking, a few different NEPA people. The last one you all met was John Bigay. And for our contractors we have had a few different contractors, but I am really happy that Rick is helping us. He is really excellent. We all talked a little bit at the last meeting and so I want to make sure that we are here to answer any questions that you might have. In regards to this undertaking, and I know that we talked about it briefly last time we were on the call, but I am wondering if anybody has any additional questions that they would like to ask.

TKW: Why are you not reopening 106?

CR: Section 106 allows us to consider additional information as we move forward. We are finalizing the EA at this time and we will take into account any additional information that you may have.

TKW: so my concern there is you said you didn't receive our letter but 'Aina Momona was specifically named in documents you sent to the SHPO as part of your consultation. So how are you saying you didn't receive our letter if we are listed as one of the parties you consulted with? And that's not true you didn't consult with us.

CR: I personally did not receive and email or your letter and I am so sorry about that and we are talking to you now.

TKW: OK but that doesn't answer my question, in the documents you sent to the SHPO as part of your section 106 consultation with the SHPO, a specific question was asked about consultation with different parties. I am looking at the letter, the 2019 letter, and it names our organization. But we were not consulted with so I think there are errors.

CR: But we are consulting with you now and I am so sorry about the oversight. I would really like this to be a very meaningful consultation and I would like to move forward on things for section 106 so that this can be meaningful. I really do apologize very sincerely that there seems to have been an oversight and that's why we are talking with you right now.

MPo: You know we've sat on two of these calls for hours and going around in circles about what is going on with 106, and none of the people on your end who have knowledge of this stepped up and just said it's completed. That would've been really helpful from the get-go. Instead I feel like we wasted a lot of time trying to figure this out when you very well knew it was completed and at least had it been stated earlier we could've move forward from that point. But I hope you can understand why we're having our frustration where we are right now.

MP: I truly understand and I share that frustration as well as we move forward through this process. We've had different parts of the Navy involved with the 106 and when we went through all our documentation we didn't feel comfortable that we had addressed your concerns so that's why we came back to you. We had been assured that everything had been done, you had been consulted and it appears to have been truly an oversight. We have changed several project managers as well in this. I have been involved from day one but I relay on my subject matter experts to guide me and this is where we're at. I share your frustration and concern and that's why we've come back to you and we humbly say forgive us for the oversight and hopefully we can move forward. If you take a look at the APE, we listened to your, based on your last conversation Trisha you were asking why we had such a large APE. We reduced it considerably. We said, look now that the analysis has shown that it possibly can be done, we're not 100% sure, but we think it can be done, these are the two smaller areas that we are interested in and we are hoping that we can get some data from you today to make sure that we have the information to move forward.

TKW: I have a question there then. So, your APE according to the 106 process that you folks have flubbed and are announcing you will not reopen. This APE is 50,000 acres. So if you're changing your APE, that requires you going back to the SHPO. I don't want to spend 3 hours going in the same circles we've gone over and over again if you folks do not have a real understanding of the process under 106. The letters say the APE is confirmed at 50,000 acres.

MP: Coral, can you answer that for us please? Thank you.

CR: I hate to say this, can you repeat that, you cut off when you were talking, I couldn't hear what you said.

TKW: Sure, so in your completion of 106, one of the questions that the SHPO asked was the mileage of the area of your APE which came up on the last call. So, I asked for the letter and the concurrence from the SHPO about the APE and it wasn't sent to me but I got it from SHPD. The APE that you have identified to the State Historic Preservation Officer is 50,000 acres. If you are now saying you are changing it, that requires going back to the SHPO. Unless I am wrong, I don't know. I think Stephanie is on the call she may be able to.

CR: Right, we talked to legal counsel and since we were reducing the size there will be less of an effect. This will be an addendum we should not have to re-open the section 106 consultation. But we are happy to assist you and we are also happy to put the APE back if that makes it better and everyone happier for everybody. But we are trying to take into account your comments from the last call and since this was a large area and although we had explained to you that our training was not going to occur in areas in between the two proposed locations for training, you wanted assurance that we were not going to train in that area. So, following your suggestion and taking into consideration all of your comments, we have tried to reduce that training area APE. The training location itself is not changing and we were not comfortable providing too much information. But we have gone back with Margherita's input we have shown a much smaller area so that we can work with you, and consult with you in good faith on the area that we are proposing the training.

TKW: I want to be clear, if this is good faith then section 106. I'm wondering if that's just instead of wasting another hour, if we can bring the ACHP into the conversation.

CR: Please invite ACHP if you would like. We work very closely with Kate Kerr and she, you know, we're very happy to have her involved. However, in this case we do fully recognize the comments and suggestions that you have provided and we are trying to take those into account while moving forward in that manner.

TKW: Okay, do you have issues about identification of properties. In the letters that you were sending to the SHPO that weren't being shared with the rest of us, you have 104 pages of historic sites that were identified that were never provided to the consulting parties. So, again we have asked for this information. I am wondering at what point you're going to start providing – you are talking about wanting to consult with us in good faith but you haven't given us information.

CR: It was our belief that these letters have been sent out to everybody and once again I am really sorry that the letters may not have been received by you. It's a large process and a number of people assist with this and I do really apologize. We do really want to work with you and we have been listening to you. And we have, we are avoiding the fish ponds, we are not training right along the coast, we are not coming over the beach. We recognize that there is a lot of sensitive areas right along the coast and really our training is within those harbors and wharfs like Margherita indicated last time. We're not building anything, we're not cutting anything down. And the training activities should be barely visible – if they are, then they're not doing their training correctly. And they're just hoping to work in areas that have been modified recently in the Harbor and the Warf by Molokai.

PN: I'm trying to get a better perspective, cultural perspective, with you folks that had done research on in order to get to the point that felt you had completed your process. So I have someone here who wants to share some [unclear] as well let me introduce himself because it kind of conflicts with what you're saying about cultural sites that may be there.

CR: Thank you.

KO: Aloha, my ancestor name in reality is Kahua Opele That is my ancestral name [unclear].

CR: Hi, are you still there? Did I lose everybody?

SH: This is Stephanie, I am still on.

PN: Are we there, can you hear me.

CR: I think, I can hear you now, you were just telling us your ancestral name.

KO: I am a lineal descendent of Molokai. I come from the high chief [unclear], he was the high chief of Molokai. I am a lineal descendent, I am a cultural practitioner on Molokai. When you guys talk about the ocean, we have religious sites that we call koa where the fish go. And the hanau and the ocean we have shallow water koa, religious sites in shallow water. We have big water. I have to learn 5 years of the deep

water sites koas in the deep water. [unclear] All of that is connected to the land because on the land sister, there's koa sites too. And when you guys make [unclear] military activities, we have you guys, the Americans, we put in law to save the turtles. We have turtle sites up there. We have [unclear] the fish you guys want [unclear] it's all connected sister.

I don't know if you guys believe me but I was born. My mama [unclear]. A traditional Hawaiian baby way. My grandpa and my great grandpa they grab me when I was born. My mama would tell me, my real mom from 12 years old, I was calling my biological momma sister. So, I was raised traditional sisters, traditionally. My life is all about my culture and now you want to come inside Molokai [unclear] and we live off the sea for generations. So my name today is [unclear], that's my name. Again, I was born and raised here [unclear] 26 generations. So, nobody can tell me who I am and where I'm from because I was born Hawaii and learning my culture. So, I feel offended now because you guys come into my aina, to my kingdom, without permission. You guys making all decisions without permission. The place is all [unclear] again. That's why they're not building the military, that's why they're not building on the south side, because the land is alive and that's for real.

Maybe you guys think I'm crazy but you know [unclear] what Punani told me, [unclear] they got to hear this. We get koas in the ocean, military miss military. That I can't tell you guys where [unclear]. My family never give you permission to expose religious sites. Where my family when we hungry, we know where to get the food. So you guys got understand when you guys will come in no matter what harbors. I know there's four harbors and they're natural harbors and every harbor and every fish pond [unclear], why every fish pond, every natural hatchery places have koa, religious sites. So if you guys fish and we fish too in our own culture. We pray for our fish, we pray for our food. Bottom line. I hate to talk like this to anybody but I think this is very important for the future of Molokai. This whole island is [unclear]. You guys do not know the history. You guys do not know the pride. You guys don't know nothing about us indigenous people. Nothing [unclear]. I'm sorry I'm not trying to offend you guys but leave us alone. Go someplace else. The picture of military I see is #1 Kahoolawe. We still get bombs in the water, we still get bombs on the land. And Molokai. There was bombing on [unclear] on Molokai too when I was a young boy. So you guys history with military are not too good. I was jailed because the Marines [unclear] military combat play Army [unclear] me and family and my friends and my cousins, we go up there and clean the fox holes with all the [unclear]. They arrest me for that. They thought I was stealing high velocity ammunition so when we go into the evidence room [unclear] I told him I am taking care of the [unclear] that the military left behind. So you know miss military, you guys are bad news on Molokai, period. So you guys [unclear]. Stay away from this island, period.

PN: From a cultural perspective from what you got from your cultural person or the Bishop museum, state lacks this information. That's the summary of what [unclear] is trying to say here. He cannot tell you all of these things because he's not authorized [unclear] - he can mention it now just so you understand the wahi pana there. Deep water and shallow and the fish ponds. I don't see how you can conclude your 106 without this kind of information being entered into it. You got to get this cultural perspective in there and how you are going to get around it I'm not sure.

TKW: I want to support what both those kupuna just said. They just identified historic sites that are eligible under the register. These are physical sites, they can be bound. Again I have questions on the 800.4 of 106 in the preliminary identification of sites that might be eligible under the register. I think you folks need to go back and the full identification of the [unclear] in that area and then do determinations of eligibility which have not yet been done for that area.

CR: We have done quite a bit of research and the next step is to reach out with you and we really would appreciate you looking at the revised locations and talking with us. We recognize that there's a lot more in your sacredness of Molokai than just the fish ponds and other areas identified in archaeological reports. Areas that are secret and sacred and we respect that but section 106, yes?

PN: Go ahead, we are here, listening.

MP: First of all I want to thank you so much for sharing that. I think it's very important that we hear that information. I don't know if you're aware of the types of training that we are proposing. Again it's just if we get permission and if everything goes well it would be for the two harbors: Hale O Lono and Kaunakakai

harbors. And it's just basically swimming. It would be guys swimming in the water in the harbors maybe 2 to 4 times per year if at all that, depending on the training profile and the skill set that they're looking to do. So, we are not looking to do anything other than swim into your harbors. Those two possible harbors, so I am not sure if you were aware of that so I thought I would share that with you.

MPo: It's not just swimming, there's also the component of the submersible.

KO: Oh no, sister, sister military. Kaunakakai Harbor we had one out there [unclear] we have a koa outside the Harbor, Kaunakakai Harbor. And in the old days Kamehameha [unclear] was living there. So we have heavy history of our [unclear]. And Hale O Lono Harbor, we have one shrine there too [unclear]. Sister I can tell you guys this because some of my people know what I'm talking about. Outside Hale O Lono and outside Kaunakakai Harbor and all the in between there you say the fish ponds blah blah blah, is all sacred, the fishponds, the mana. The fishponds have their own story and their own powers sister military, you know?

MP: I hear you, now don't call me military. I am a local girl too. I just happen to be working...

KO: Oh you're a local girl, sister? If you are local girl then you understand where I'm coming from.

MP: I do, I do.

KO: You're working for the desecration game and you don't understand where I am coming from, is from Hawaii.

MP: I do not want to desecrate anything.

KO: I don't go to your island sister and I [unclear]. I respect your island. My people are not over there, my people are buried over here. That's why I get very [unclear] with you guys.

MP: Coral, please explain to me are we proposing to train over any fish ponds? I thought we were not.

CR: We are not, we have avoided all the fish ponds we worked really hard to avoid the fish ponds and other areas that have been identified in all the reports and we understand that there are other sacred areas that may be located, and sometimes sacred and secret locations. We just want to work with you really closely. Locations in and out of the Harbor where the boats regularly go is where the training is proposed, not areas where the boats do not go. And the little submersible does not go into the Little Harbor.

KO: Oh sister, what's your name what's your name again local girl?

CR: My name, oh that was Margherita that you were talking to. She is local.

KO: Where are the harbors you guys don't say anything about the harbors and bringing in the submersible. You guys don't look and see the picture, You guys cannot see the cycle of life, of man and the ocean. We're all together, synchronized together. You guys will come in the harbor. We have seasonal, seasonal [unclear]. I can go on and on and you know what [unclear] they going to hang me, they going to cut my [expletive].

TKW: So this is my next question. Why not take Molokai off the table?

KO: That's what I'm trying to say. Leave us along. Beat it.

TKW: I agree, I mean you have 6, 5 other islands you're going to train on that we do not have this issue.

KO: [unclear] military base, hundreds and thousands buried down there and [unclear]. Forgive me, forgive me.

TKW: This is the most highly concentrated subsistence fish pond, fisheries, probably in the entire state. I cannot understand why you can't take this part off the project entirely. I mean obviously it's going to be a fight the entire way. I can't imagine at some point still the strategic road showed up.

PN: We can go onto your sacred site, maybe Punchbowl or Arlington, and go practice our culture over there. It's the same thing, but maybe you guys cannot get what we're saying. Same thing. Wahi pana over there, wahi pana over here. [unclear] Your research is not going to show [unclear].

CR: So as you all understand we are consulting under section 106 at this point but we do plan to consult under 6E at a later time. Section 106 is really focused on the historic property identification. We look really closely at areas of concern. It's going to be a two-step process for this EA because it's a HEPA/NEPA document, it is not just a federal document. So at this time we are listening to you.

TKW: So again, you can't even give us a clear answer on where the APE is, you say it smaller the document say it's the entire area so that's 800.3. 800.4 – you have now had kupuna identify that there are numerous sites that qualify as historic properties under 106 that you have not identified and you've not evaluated.

CR: But you have just identified that these historic properties are sacred and secret, unless you know where they are. That's another step. If you're not willing to share the location with us you just identified that they are secret. We do want to work with you we are listening to you...

PN: But your process is secret too. This whole thing is secret. The SEALs are secret, their operations as you said on August 13 notes, we're not even going to know that they're there so how do we know that they have been there over these areas if it's a secret there too? So how come our secret has got to be exposed and yours does not?

CR: I'm not saying your secrets have to be exposed. But we cannot address them as historic properties if we do not know where they are we want to acknowledge that you have these...

...PN and CR talking over each other...

PN: He said he cannot divulge. You have to assume that the historical information that has been presented, the cultural perspective, is there. And if it's there then you got to accept it.

CR: We do accept that it's there. However, because it is sacred and it is secret it's hard for us to address and in the process right now....

TKW: I'm just gonna stop you, it's on websites that the federal government has issued policies on this. It far out untrue that there are not mechanisms in place to deal with sensitive information by the Hawaiian native people. Now you're really getting on my nerves. Either you know [unclear]. It's done all the time. You don't get to tell us to ignore historic sites because we don't know how to deal with identifying them. That is your obligation as the federal agency. Honestly like this is, I'm super pissed now. I'm saying if we're just gonna fight it out, we're just gonna fight it out. And I'll tell you this is not where I started. I got asked to come into this and I've never seen a 106 handled so badly, and I do this for a living.

CR: I know you have not enjoyed talking to me and I really appreciate that you are talking to me now and we would really like to move forward on this.

MPo: We've heard this and you keep saying the same things. You know it's getting frustrating and we keep talking around in circles. Just to speak to uncle's point requiring that this closure, exact coordinates of a cultural site that is supposed to be secret is in itself a violation of cultural traditions. I want to just concur really quick with taking Molokai completely off the table. And I want you to take this back to whoever does make the decision and describe to them all the procedural issues that we have brought up and make a decision as to whether or not you are going to move forward with Molokai, and if you do then I guess we are ready to fight it out and drag it out as long as it takes to protect what we have to protect.

MP: I have a little question - please have patience with me. I hear what your concerns are and I am curious. My question is: these two harbors, especially Kaunakakai is a public harbor. We are looking to use the same access that the public uses to get into the harbor...

KO: You are not the public. this is really bad sister [unclear] you are not from Hawaii hello you shame on your ancestors girl.

MP: I am also Native American.

...KO and MP talking over each other...

MP: And I have a Hawaiian ancestor too.

KO: Yeah, will you better check with him.

MP: Anyway, again bear with me I am learning so much so thank you for sharing. [unclear] With this Kaunakakai with people accessing the main harbor, the public accessing that harbor, are they also going over your sacred sites as they go in and out of that harbor?

KO: [unclear] Yes, there's koa. Margherita, the koa right outside the harbor my people know where to stay to I guess. I'm a fisherman. I'm not a farmer. I'm a fisherman bottom line [unclear] so that Harbor [unclear] right outside the harbor mouth, come on sister talk to your ancestor.

PN: I guess because of the fact that we have a very contentious history. The fact that the state and the DLNR don't really represent our interests and this is why we have this situation today. So if you try to imply that oh these other guys are going all over [unclear] so then why can't we, then let's put an end to that thinking.

MP: I'm not trying to imply I'm trying to understand the process that's all.

PN: We are trying to understand the process as well. But because the process has been usurped, because of the historical injustices. We can go back to how Hawaii became part of America [unclear] and the people,

that supposedly our trustees, are not honoring their trust to their beneficiaries. This is a beneficiary, deeded land in between the two harbors [unclear], but everything in between is wahi pana. That's what we saying is that you folks violated our sacred wahi pana. It's difficult because these state agencies say they represent us but they do not speak to the beneficiary so you assume that it is OK because they gave you permission. They supposedly are the property owners. We the property owners as the kamaaina.

MP: Thank you so much, I think I am understanding you better. So what you're telling me, if I'm understanding correctly, is that whoever is the provides the permitting for the two harbors is doing it erroneously because there are wahi pana when going in and out of the harbor. So in other words you cannot access the harbor without going over your sacred sites, is that correct?

PN: So they're not listening to that perspective, not even our own state trustees who represent the beneficiaries, is what I am saying. They are usurping our native cultural rights. They are usurping our perspective of [unclear] injustices. Just because it is a sacred site and has not been identified in your western concept that don't make it not sacred that's what the word [unclear] means. You guys have laws to protect our rights as natives because that's the same thing we went through with our [unclear].

LB: Pardon me Punani, you started down this track insinuating that we are probably singling you out in a commercial used space and trying to compare apples and oranges by wanting to tell you on the record that we have a long historical history of engaging with several entities that propose projects at the Kaunakakai pier. We came out in full force to oppose ships landing on the pier, the installation of 26 inch pipeline, the installation of the MARSEC, [unclear] was instrumental in writing up protocols with the Department of Land and Natural Resources. I have engaged personally with Verizon and other entities wishing to build projects on the Kaunakakai pier. we have engaged in multiple years of discussion with the Department of Land and Natural Resources with the use of the channel and the Kaunakakai pier for multiple canoe races during the year and the impacts thereof. So, this is totally not singling out the Navy special ops. You are but another person wanting to abuse our resources and we are responding to that, that we do have concerns that is going to be, have adverse impacts. And I wanted to address Coral at this point too. Can I get into the discussion of whether or not we are going to pinpoint because on the record today you have already heard Mr. [unclear] state for the record that there is koa adjacent right outside of the harbor and within the harbors is already a statement on the record. And I wanted to speak to others on this call. I understand that Robert is your lawyer, Robert Rowland is your lawyer and he's listening to all of this. I agree with Trisha Watson and whatever you wanna call talk-story session. You're not in 6E, you want to put a 106 on it but it's closed. We don't know what the hell it is. I think that Trisha you have to take Molokai off of your proposed area and I've heard now three talk story sessions with the person in charge of the actual Navy SEALs operation. I am well aware of how that is going to happen. You have heard that we are totally opposed to this. Our Congress people in fact know that we are opposed to this and we will make it very clear to the department and the SHPO that we are opposed to this. And so if the Navy still wants to go there. I hope at some point I want Trisha on our behalf to wrap it up and what we propose to do if you guys want to go there. If you guys can talk story with Robert and Rick, whoever you guys got to talk to you. Now more so I'm adamantly opposed because of the pushback and your inability to be culturally sensitive which is disingenuous on this call and I am aghast and I am offended. Thank you very much.

KO: Right on.

MP: First of all, thank you for sharing. I don't believe that you're singling out us. Having watched the history of Hawaii and knowing what's going on for the last 30, 40 years I have a smidgen of understanding that this is just part of the – we're lumped in with all the other trainees. For me it's difficult because I have Hawaii boys on our team that are training in Hawaii, they're watermen and we recruit successfully from Hawaii because of the aptitude of our guys here in Hawaii and respect for the water. We do have with some of the consultations, that we've had a request to do a pule and a moment of aha, if it's called correctly. And we're going to incorporate that into our training profile. Again, we're not looking to build anything, we're not looking to leave a mark, we're looking to just swim. And what attracts us to Molokai is the fact that they're small harbors and they're not well lit. So for our people, our guys who are unfamiliar with Molokai, the challenge is to be able to find the puka, if you will, as they're coming in from the ocean to find a puka to get into the harbor and that's what attracted us to Molokai. So, I just, thank you for sharing. And I am

sorry that you think I'm disrespectful. I have tried my hardest to coordinate with everyone because in Hawaii I believe we are all connected. What I do on this island can affect you on your island, what you do on your island can affect me here. So I'm trying my best to reach out to everyone the best I know how to make sure that I listen and that I hear and then I go back to everyone and make sure that we've done everything the way that we need to do it. So bear with me and I thank you for taking the time to share with us your cultural perspective of Molokai. I've been to Molokai several times. I've had incredible experiences, mystical experiences on Molokai and I will never forget them. I was brought there by cultural practitioners and it is just absolutely fascinating, and they did chicken skin experiences from Molokai. So I hear you loud and clear and I thank you for sharing and I respectfully thank you. I'm not here to belittle the practices or anything that you shared. So if you feel that I have done that, that is incorrect. I am listening to you loud and clear. I am just trying to understand the process that I am working within. So we're going to note all that information that you gave us. We want you to realize that again the training is only water-based training and that we are only looking, we reduced the APE. Trisha because you have rightfully said hey you've got this whole big area, we've got a lot going on in this area. So we took a look and said, well geez let's reduce it, and we've done that. So I don't know what else to say at this point. Coral do you have anything else to add to this?

CS: I am going to interject. This is Cora Schnackenberg. I represent the Ahonui Homestead Association. You know it's not about chicken skin. It's not about education. This is a lifestyle. Our people of Molokai, this is a lifestyle, this is not a fad, it's not tourism. We are talking about [unclear] ancestral background. And part of informing you, part of, its sacred you need to understand. And I agree with Lori Buchanan that you are not sensitive to our culture. You're not. It's not just you, but the whole military. Because its only swimming, that you're going to cut short your folks permit to mess up with the EA. It's [unclear], it's not even pono. So you guys, I am for taking this thing off the table because you're definitely not hearing us. That is my position. I am totally with everybody that is opposing this whole request and permit. Mahalo.

MPo: I just have to comment on the moment of silence that you're going to be writing into your plan and it also just speaks to the differences between cultural practices and what is acceptable and not in different areas among different communities of Hawaiian people. Because that might fly in other communities and be enough for them to accept your training, but to me that was actually offensive to hear. It just means to me that we're going to take this moment of silence before we desecrate your cultural spiritual grounds. So yeah just to think about. Even if you're hearing it from other people like practitioners around the state, it doesn't necessarily mean that it applies or is going to be well received by everyone else.

TKW: I want to echo what Mahina just said. Just because someone [unclear] absolutely does not mean that that would work for everywhere. This has been discussed written about, studies have been done on it, about how you can't apply what may work for one community in Hawaii to another. So I agree with Mahina. I am also like so offended and I so rarely get totally offended these days. I'm shocked. I just really am. I've spent hours and hours and I don't feel like...One, I am very frustrated because we wrote a letter. We followed the process to a T. We submitted within the deadline of the EA. We said all the things we needed to say on 106 and it was still completely ignored. And even now the request reopened, acknowledging that people made a mistake, is being disregarded. So I don't know how you folks could straight-faced say let's go through the process [unclear], when for 2 years you have followed the process with complete disregard of any native Hawaiian organizations or family efforts to properly follow the western process. so I think that's outrageous. We did everything right. You folks screwed up and yet the community is still being penalized. So I'm not comfortable with let's just keep going forward. We've recognized we screwed up. That doesn't matter. We're just gonna sweep this under the rug. I think that's fully unacceptable. My position dead firm take Molokai out. Period. So that's what's coming. It's gonna be a fight. I think these meetings are a waste of time at this point.

MPo: We can't just keep going around in circles.

TKW: Sorry say that again.

MPo: No, I mean it doesn't seem like we're getting any new information from the Navy side.

LB: I agree with, this is Lori, I agree with the statement from Trisha.

MPo: Yeah me too.

TKW: And I want to be clear, I think all of us who have been now on three calls for hours and hours really came to the table [unclear]. That's why we wrote the letter. That's why we followed up. It's why we been here and I feel like you guys just have been so, on the government side, the federal government side, have just been so tone deaf and insincere at our request, that I think you blew it in these meetings. So this is not we came in absolutely opposed, you folks got us there. I want to be really clear and have that be on the record.

CR: So thank you so much for talking with us. We do appreciate you sharing your reasons and ...

SH: I just want to say that, as far as the APE goes with it being a reduction in size. I don't see that making much difference in the decision making and the final determination. I cannot speak for the SHPO but I, I don't think this is something that would be a large concern. But where I'm concerned from the regulatory perspective, in my opinion, what's going on today and I guess you guys have had two prior meetings, is section 106 consultation. So in my opinion, I do think that it's hard to argue that section 106 hasn't been reopened. And just to go further on that, I think that one of the major objectives of 106 is to take into account information and concerns raised by the consulting parties and native Hawaiian organizations to afford the opportunity to minimize, mitigate, and avoid impacts to historic properties. In order to conduct a reasonable and in good faith consultation effort, you know in my opinion it requires allowing the consulting parties opportunity under section 106 to provide comment and the opportunity to make changes to the final scope. Now I hear you Margherita and the Navy that what you're proposing is swimming, may or may not have a big impact on historic properties should they be present. But I still think that as far as process goes, I think that the Navy recognizes that this is consultation that you do you know, if nothing else, to just give folks a platform to consult and to provide them the opportunities to make changes to the section 106 because it's not their fault that their letter was overlooked or not received before. And so again I think this is consultation now. It may not be going in a great direction on either side, but I do think it's important just to know procedurally from a regulatory standpoint, also as far as 800.11 is concerned, there is a responsibility for the Navy to provide to the SHPO copies or summaries thereof, of the consultation effort and so I would ask that this is looked at as either a real reopening or reinitiation and that our office receive record of the consultation that's going on right now. And that's all I've got for that. Thank you.

CR: Thank you Stephanie. Is there anybody else that would like to say anything before we close the meeting?

KRF: Aloha, this is Councilmember Keani Rawlings-Fernandez with the Maui County Council. I would like to make sure that this is on the record that our county council passed a resolution unanimously opposing any military activity in the county near shore waters. You have that in your records.

MP: We are aware of that, thank you.

KRF: I want to make it very clear that who you're hearing from is not just a few disgruntled community members. They are representing the larger community and as a representative of our county, I am also representing the larger community in opposing military training in our harbor.

KO: Keani, your grandpa August, you have his mana.

KRF: Mahalo uncle.

KO: They were my teachers too.

CR: I'd like to thank everybody for joining on the call. We are listening and so the next step is we will write up our notes and we will give those out to you. And we will provide all the meeting notes to Stephanie as well as the Historic Preservation Officer

MPo: Can I request the recording?

RS: Was that Mahina requesting the recording?

MPo: Yes please.

RS: Yes, I will do that.

MPo: Thank you.

TKW: I'd like to request that Keani be copied on all the correspondence to the SHPO so she can disseminate it to the local community. Sorry Keani not to volunteer you, I think it is important.

MP: this is Margarita, do we have your contact information.

KRF: I will put my email in the text.

MP: Thank you.

CR: OK, thank you everybody and I hope you all have a good day.

PN: Mahalo. Aloha.

MP: Aloha, and thank you for sharing.



DEPARTMENT OF THE NAVY

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5000-45E
N45
April 2, 2021

Theresa Donham
County of Hawaii Planning Department
Cultural Resources Commission
Aupuni Center, 101 Pauahi Street, Suite 3
Hilo, HI 96720

Dear Theresa Donham:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process and for your letter of January 7, 2019 providing us with your subject comments. Subsequent to receipt of your letter, on February 7, 2019, Navy representatives met with Mayor Kim and some of his staff and department representatives in Hilo to hear and address concerns. Your comments and all others received on the Draft EA are included in Appendix A (Agency Correspondence) and Appendix C (Public Comments and Responses) of the Final EA. Our responses to your comments follow.

Comment 1: Area of Potential Effect (APE)

The Area of Potential Effect (APE) for National Historic Preservation Act (NHPA) Section 106 is synonymous with the project Study Area and has been revised for the Final EA. Training would be conducted in selected coastal nearshore waters and shorelines on Hawaii Island. Only water-based and land-based training is proposed for Hawaii Island; no air-based training would occur. The APE is larger than the actual area that would be used for the proposed training due to the application of buffer areas, and would be limited to smaller sites on state and private land, which would have the consent of property owners before training activity occurs. The APE/Study Area for Hawaii Island consists of three separate segments of the western coastline (from north to south):

- the first segment includes the Kohala coast from Mahukona Bay/Beach Park to Kawaihae Harbor;
- the second segment is from Kahuwai Bay to Puhili Point on the Kona coast; and
- the third segment is from Honokohau Small Boat Harbor to Kahului Bay, also on the Kona coast. Based on coordination and discussion with the National Park Service, the Kaloko-Honokohau National Historical Park and Kealahou Bay have been deleted from the APE/Study Area.

Per your comment, the spelling of Kawaihae has been corrected in the Final EA.

Comment 2: Potential Impacts

Comment 5: Identification of Cultural and Historic Properties

Comment 9: Notification

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of Naval Special Warfare Command (NSWC), initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August and September 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the NHPA for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land-, water-, and air-based training activities in the state of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 Code of Federal Regulations 800.4(d)(1). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA. Coordination with interested parties and agencies per Hawaii Revised Statutes (HRS) Chapter 6E is ongoing and the results of those discussions will be included in the Final EA.

The frequency of training at any one location would be limited to no more than 10 training events/year under Alternative 2, the preferred alternative. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition and explosive demolition, and does not include off-road driving, ground-disturbing activities, vegetation cutting or removal, tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. The proposed training activities are consistent with public use and are similar to hiking, swimming and diving, just with the intention of not being seen. The trainees learn skills needed to avoid detection and enter a site at night. Additionally, there is no active training operation for the public to see and there would be no public notice of proposed training events.

Support staff on surface support boats would be dressed as members of the public and would only interact with the public if there were a chance the public may unintentionally discover trainees. Support staff would visit a training site prior to the start of a training event to determine if there is too much public presence for the training to safely proceed. Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. All training activities would be non-invasive in nature and the Navy has no intention or authority to close public beaches or restrict access to any area within the proposed training study area/APE.

NSWC conducted an extensive search for areas that would meet its training requirements and avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include suitability to meet training requirements, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of an area at the time the training would be scheduled to occur. Having a varied selection of locations in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training

locations minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same areas.

As specific training activities are scheduled, compatible locations within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific locations, area selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training areas more readily allows NSWC to select areas with the goal of separating the military activity from the public, while still meeting its training objectives. To conduct activities in state, county, or private lands, NSWC will coordinate with the land owners and obtain real estate agreements/right-of-entry permits as required, prior to their use for training activities.

Proposed training activities assessed in the EA would continue for the foreseeable future (i.e., ≥ 10 years). If during the course of training activities there are significant changes in the training tempo, methodologies, requirements, etc., then a supplemental EA would be prepared to address these significant changes and the EA preparation and review process would be initiated.

The Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (Hawaii Administrative Rules [HAR] Section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today, from November 8 through November 10, 2018, and once in *The Environmental Notice* on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

Comment 3: Precautions for the Public

Water-based training activities are identified as diver/swimmer, insertion/extraction, and launch and recovery (the process of placing a vessel into the water and recovering it). In general, water-based training activities would include trainees, a training supervisor, and safety support personnel for the submersible craft or watercraft operation phases of the event. Support personnel are assigned to supervise water-based training (typically from a boat) and provide medical support if required. Supervisor and safety support personnel would focus on maintaining a safety buffer consistent with U.S. Coast Guard (USCG) regulations, namely the USCG Navigation Rules and Regulations Handbook, as the site conditions and surrounding environment dictate. For example, navigation lights on a dive boat (i.e., red

over white over red) or a diver down flag indicate that a dive is in progress and oncoming vessel traffic needs to keep well clear at slow speed. Dive site locations would avoid locations that experience heavy traffic patterns, such as main shipping routes or areas with heavy fishing activities. In the event non-participating vessels approach an active training site, safety personnel would utilize radio Channel 16 (intended for international distress, safety, and calling) to contact vessels as needed. If an oncoming vessel does not respond, a safety boat would approach the vessel and, depending on the situation, ask it to (1) hold its position, (2) go around the dive site, (3) if necessary be escorted by the safety boat around the dive site, or (4) divers would be recalled out of the water.

Safety buffers ensure the safety for the trainees, training vessels, and any commercial or civilian craft transiting near the event location. Other responsibilities for safety support personnel include looking out for hazards to navigation that could affect the safety of the trainees, and recalling swimmers and divers, or the small submersible, to the surface if required. If the public enters the training area, the safety support personnel will assess the situation and, based upon safety considerations, will either continue the training, temporarily suspend the training, completely stop the training, or relocate the training to another approved training site.

For safety and coordination purposes, land managers of public property and owners of private property, where training has been authorized, would be contacted in accordance with right of entry agreements, at a minimum of 24 hours in advance of training. NSWC would also coordinate with local police departments and law enforcement prior to conducting training activities and on an as-needed basis.

Comment 4: Training Locations and Consent and Comment 7: CZMA Program

Training would only occur on lands where a right of entry or other real estate agreement with a willing private property owner or manager of public property (e.g., state, county, city) is received. All training would be conducted in terms of any stipulations, requirements, and mitigation measures contained within the real estate agreement/right-of-entry permit.

The Special Management Area (SMA) permitting system regulates all types of land uses and activities under a broad definition of “development” within the SMA. The SMA permit is a management tool to assure that developments in the SMA are designed and carried out in compliance with the Coastal Zone Management (CZM) Program objectives, policies, and SMA guidelines. Per Hawaii Revised Statutes Section 205A-22, "development" means any of the uses, activities, or operations on land or in or under water within an SMA that are included below:

1. Placement or erection of any solid material or any gaseous, liquid, solid, or thermal waste;
2. Grading, removing, dredging, mining, or extraction of any materials;
3. Change in the density or intensity of use of land, including but not limited to the division or subdivision of land;
4. Change in the intensity of use of water, ecology related thereto, or of access thereto; and
5. Construction, reconstruction, demolition, or alteration of the size of any structure.

As the proposed training activities do not include any of the activities listed above, they are not considered a development, and an SMA Permit from the County of Hawaii would not be required. In accordance with the Coastal Zone Management Act (CZMA), the Navy completed a Federal Consistency Determination in coordination with the Hawaii CZM Program for activities that would occur on non-Department of Defense (DoD) lands and on July 1, 2020 received a conditional concurrence with the Navy’s determination that the proposed activity is consistent to the maximum extent practicable with the enforceable policies of the Hawaii CZM Program. Correspondence regarding the CZM Program consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Memorandum of Agreements (MOAs) mentioned in your comment (and page 3-126 of the Draft EA) were prepared for activities on DoD lands (Pacific Missile Range Facility on Kauai) and are not applicable for non-DoD lands. If during coordination with the land owners of properties that are proposed for training activities a MOA is deemed appropriate, that option will be pursued.

Comment 5: Identification of Cultural and Historic Properties

See Comment 2 above.

Comment 6: Identification of Ponds

The training study area is larger than the actual area that would be used for the proposed training due to the application of buffer areas, and would be limited to smaller sites on state and private land, which would have the consent of property owners before training activity occurs. Training would not occur within or the immediate vicinity of ponds, including anchialine ponds. Training would only occur on lands and waters where there is a right-of-entry or other real estate agreement with a willing property owner or property manager. Please note that NSWC has done an extensive search for sites within the training study area that meet its training requirements and minimize or avoid impacts to the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts to the environment, accessibility, cultural and biological resource site conditions (e.g., scheduled public events, occurrence of cultural resources, and protected species considerations).

Comment 7: CZMA Program

See Comment 4 above. The CZM Program is under the State of Hawaii Office of Planning and public review is not part of the CZM Program Federal Consistency Review.

Comment 8: Protection of Cliffs

High-angle climbing is not proposed on Hawaii Island. High-angle climbing would only occur on Oahu.

Comment 9: Notification

See Comment 2 above.

Comment 10: Permits and Approvals

The Final EA has been revised to include a list of the expected permits and approvals for the proposed training activities in the state of Hawaii. Table 5-1 (Principal Federal and State Laws Applicable to the Proposed Action) in Section 5.1 (Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions), has been revised to provide a summary of the compliance status for applicable laws and regulations, including HRS Chapter 343, HRS Chapter 195D, HRS Chapter 6E, HAR Chapter 11-200, and HAR Chapter 13-124. Site-specific real estate agreements would be obtained prior to conducting training in areas where consent is needed.

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N45
April 2, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R
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Date: 2021.04.02
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SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Theresa Donham.

Copy to: Hawaii Department of Land and Natural Resources

Harry Kim
Mayor



Theresa Donham, Chair
Deborah Chang, Vice Chair
Alex Akau
Geraldine Bell
Benjamine Heloca
Ke'ala Lee Loy
Christine Wada

County of Hawai'i

PLANNING DEPARTMENT CULTURAL RESOURCES COMMISSION

Aupuni Center • 101 Pauahi Street, Suite 3 • Hilo, Hawai'i 96720
Phone (808) 961-8288 • Fax (808) 961-8742

January 7, 2019

U.S. Naval Special Warfare Command
Julie M. Zimmerman, Senior NEPA Planner (EV21)
Naval Facilities Engineering Command, Pacific
Attention: Project Manager, EV21.JZ
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860-3134

Dear Representative of the Department of the Navy:

SUBJECT: Comments Pursuant to Section 106, National Historic Preservation Act and DEA
Project: Proposed Naval Special Operations Training in Hawai'i
Landowners: Numerous
Locations: Numerous

The Hawai'i County Cultural Resources Commission (CRC) was not consulted pursuant to the Section 106 review for this project. The members of the Commission learned of the proposed project from various news sources. The CRC obtained a copy of the Section 106 comment request addressed to Dr. Alan Downer, Deputy State Historic Preservation Officer of the Department of Land and Natural Resources-State Historic Preservation Division (DLNR-SHPD) dated August 22, 2018, as well as the Draft Environmental Assessment (DEA) dated November 2018. The CRC conducted a hearing on this matter on December 12, 2018, and provided comments as several areas of Hawai'i County are proposed for the Naval Special Operations Training. No representative from the Department of the Navy attended the meeting to offer a presentation or answer questions.

Comments provided by the Cultural Resources Commission:

The Hawai'i County Cultural Resources Commission has major concerns regarding the Naval Special Warfare Command's (NSWC) proposal to conduct small-unit, water-based, land-based, and air-based training in the State of Hawai'i, including areas within the County of Hawai'i. The Hawai'i County Cultural Resources Commission's questions and concerns of these documents area are as follows:

1. Area of Potential Effect (APE): The geographic location of the Area of Potential Effect (APE) is inconsistently described throughout the documents for the Island of Hawai'i.

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planning@co.hi.us

ENCLOSURE

Department of the Navy
Commander
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This is a basic requirement to enable an intelligent response to the Navy's proposal. The Draft Environmental Assessment (DEA) repeatedly describes the APE as including "two stretches of the western coast from Mahukona State Park to Kawaihai Harbor in Kohala and from Hualalai Golf Course to Captain Cook in Kona." (The misspelling of Kawaihai is repeated throughout the DEA.) On page 3-124 it says that the APE is "along two stretches of the Kona coast." This is inconsistent with the earlier statement. The map on page 1-11 shows the "Training Study Area" extending to Kailua-Kona Bay, which is significantly north of Captain Cook. To further confuse the reader, Table 3-8 lists "Kealakekua Bay Historical District" as being in the APE. Does the APE stop at Kailua-Kona Bay or does it continue south to Kealakekua Bay?

2. Potential Impacts: Potential impacts of the proposed training on cultural resources which include the "myriad of year-round mountain and coastal outdoor recreation activities" described in "3.2.2 Affected Environment," could be significant, and the DEA does not address how potential impacts will be mitigated other than repeatedly stating that the duration and frequency of training activities would be "minor and temporary." However, on page 2-22 a training event is described as typically consisting of up to 46 people and could extend for 72 hours. Since training would be occurring on coastal public lands where people frequent, how will public notice be given prior to training events? Will public beaches be closed and for how long? How many years will the training be conducted? Is there an end date?
3. Precautions for the Public: Page 3-58 describes what the Navy would do "if the public enters the training area." Based on their safety assessment, the Navy will "either continue the training, temporarily suspend the training, completely stop the training, or relocate the training to another approved training site." Since the training areas are along the coast where the public can be expected in the ocean or on the beaches, this does not sound like a realistic approach. Instead, precautions should be taken to ensure the public does not enter the training area.
4. Training Locations and Consent: Page 4-164 states that "Training would only occur on non-federal property if proper consent was given," and page 1-2 mentions "right-of-entry" permits for training on non-federal property. Since the water and land-based training would be occurring on public lands, does this mean that permission from the County of Hawai'i would be a requirement? Would the Navy submit a Special Management Area Assessment Application (SMAA) to the County as a means of obtaining "proper consent?" Should a Memorandum of Agreement (MOA) be established with the County of Hawai'i to outline the conditions and responsibilities of using specifically identified public lands where training is to occur? Two MOAs are

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mentioned on page 3-126 as existing for Navy undertakings on Kaua'i, so there appears to be precedent for this.

5. Identification of Cultural and Historic Properties: The DEA's identification of cultural and historic properties located in the APE is grossly inadequate. How can culturally and historically significant properties be avoided and protected (as intended on page 3-129) if the Navy does not know where they exist? It is well known in Hawai'i that many of the most sacred and unique sites are not on the National Register of Historic Places (NRHP). It is unacceptable that the Navy expects to receive approvals to proceed with training based on the woefully incomplete listings of historic properties eligible for and included on the NRHP. Page 3-128 states, "No Traditional Cultural Properties have been identified in the APE on Oahu or Hawaii Island." This statement serves to illustrate the need for caution in proceeding with the Navy's training proposal without more in-depth study of the APE.
6. Identification of Ponds: Ponds were essential to the survival of ancient Hawaiians and are culturally important. Archaeological sites are frequently located in and adjacent to ponds. Figure 3-6 implies that there are only two ponds of significance in the APE. This is incorrect, and casts further doubt on the credibility of the DEA. There are many more ponds in the study area, ponds that serve as habitat for endemic birds. Ponds at Kohanaiki as well as the County's sewage treatment plant are frequented by the Hawaiian Stilt and other water birds. Both locations are in the APE, further illustrating the need for more in-depth study of the APE.
7. CZMA Program: Page 3-56 says that activities on non-federal lands will be evaluated by the Hawai'i Coastal Zone Management Program via a "Negative Determination" and a "Federal Consistency Determination." Do state and county agencies participate in those determinations? Is public review a part of those processes?
8. Protection of Cliffs: "High angle climbing" as a training activity should be prohibited on any cliff areas that are prone to crumbling. Examples of erosion-prone cliffs abound on Hawai'i Island, notably in the APE between Māhukona and Kawaihae. There are historic coastal trails at risk of being lost to coastal erosion, and high angle climbing in the wrong locations could exacerbate the loss of historic trails along the coast.
9. Notification: The Section 106 review and the DEA were not sent to the CRC or the Hawai'i County Planning Department for review and comment as required. The Department of the Navy should make every effort to seek comments from all affected government agencies, community groups, affected landowners, cultural descendants, etc.

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Page 4
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10. Permits and Approvals: The Section 106 review and the DEA did not list the permits and/or approvals that would be required for the proposed project. This is a basic requirement of these types of reports. Please include a comprehensive list of all required permits and approvals needed for this project.

Based on the review of the above referenced documents, the CRC has concluded that this project has the potential to have an adverse effect on historic properties on Hawai'i Island. The CRC requests that the Department of the Navy consider revising the DEA and Section 106 review documents to incorporate the above information and reinitiate the review process. If you have any questions or require further information, please feel free to contact Jeff Darrow of this office at (808) 961-8158.

Sincerely,



THERESA DONHAM, Chairperson
Hawai'i County Cultural Resources Commission

JWD:klt

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cc: Hawai'i County Cultural Resources Commission
Sam Lemmo, DLNR-OCCL



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Michael Reimer (GeoMike5@att.net)

Dear Michael Reimer:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Proposed Action is in accordance with the Naval Special Warfare Command (NSWC) meeting its Title 10 U.S. Code Section 167 mandate as discussed in Section 1.3 (Purpose of and Need for the Proposed Action) in the Draft and Final EAs. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. During the development of the alternatives, NSWC considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training

objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

There is no active training operation for the public to see. The trainees learn skills needed to avoid detection. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.

There is no intent to utilize the public in any of the training events or scenarios. Support personnel include safety personnel who maintain safety buffers, occupy emergency response vehicles and provide medical support when necessary. During training events, support personnel are responsible for the safety and oversight of trainees participating in the activity. The support personnel continually evaluate the training scenario and employ standard operating procedures to ensure that training activities are isolated and remain safe (Section 2.1.3). In addition, Navy policy requires that training activities ensure the safety and health of personnel and the public (Public Health and Safety, Section 3.6.2).

The purple area depicted on the maps in the Draft and Final EAs is a study area. Training would be conducted in selected coastal nearshore waters and selected shoreline and inland locations throughout the State of Hawaii; the training study area is larger than the actual area that would be used for the proposed training due to the training's sensitivities and would be limited to smaller sites on federal land and on state and private lands that have the consent of property owners before training activity occurs. Areas on the Island of Hawaii outside of the training study area (purple area depicted on maps), such as Hawaii Volcano National Park, are not included as part of the training study area. Thus, no training is proposed outside of the training study area. Simulated building clearance training activities are not proposed on the Island of Hawaii.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and

conclusions contained within the document. Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA). The activities are similar to those conducted by the general public.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been

completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

As stated in Section 3.5 (Noise) of the Draft and Final EAs, training activities would generally occur away from residentially zoned areas and the operational conditions of land-based activities is to remain undetected and leave no trace of presence during or after the training. In addition, the operational conditions of aviation activities to maintain elevations above 2,000 feet except for short periods (below 500 feet for approximately 10 minutes) associated with proposed training under Alternative 2 (Preferred Alternative) avoids and minimizes noise and potential noise impacts. Disturbances are expected to be short term and infrequent and any impacts on points of interest are minimal and short term based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities. Air-based training would not occur on the islands of Maui, Lanai, Molokai, and Hawaii. Only unmanned aerial systems (UAS) would be used during air-based training on Kauai and only on federal property.

Air quality is analyzed in Section 3.1 of the Draft and Final EAs and Air Quality Calculations are presented in Appendix B. Transportation vehicles, vessels, aircraft, and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on regional ambient air quality. In addition, the dispersive nature of the proposed activities would prevent pollutants from concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed National Ambient Air Quality Standards. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination. Therefore, no significant impacts on air quality would occur with implementation of Alternative 2 (Preferred Alternative).

Regarding Section 4.3.2.2 (Long Range Strike Weapons Systems Evaluation Program). This action is being addressed in the cumulative impact section as it is a 'Present and Reasonably Foreseeable Action' within the action area of the proposed NSWC training activities. The activities associated with that program are not part of the proposed training activities assessed in the Draft and Final EAs. The Long Range Strike Weapons Systems Evaluation Program is completely separate action and has completed its separate required NEPA documentation.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs; consultations with the USFWS, NMFS, Hawaii Office of Planning, Coastal Zone Management Program, and Hawaii SHPO; coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

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N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 31, 2018 comment letter from Michael Reimer.

Copy to: Hawaii Department of Land and Natural Resources

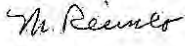
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NAPAC-Receive@Navy.mil

I welcome the opportunity to provide commentary on the November 2018 Draft Environmental Assessment for Naval Special Operations Training in the State of Hawaii and appreciate the extended deadline. I will use examples in discussion often associated with Hawaii County but for the most part they are representative for the entire draft environmental assessment.

There are a number of major issues related to the training program that are not addressed adequately or discussed at all in the Draft Environmental Assessment. In addition, the alternatives provided are not alternatives in any sense but merely extensions of the no option alternative. They are short-sighted, greatly lacking in detail, often contradictory, and the draft environmental assessment misses the opportunity to present realistic alternatives that would greatly enhance understanding and reasons for supporting the claims of a finding of no significant impact (FONSI) related to the operational goals.

The sections of the Draft Environmental Assessment requiring amplification and forthright discussion are of sufficient number as to require, at a minimum, a full Environmental Impact Statement. Greater discussion and presentation of information and fuller accounting of anticipated environmental impacts are necessary to describe the complete ramifications of the proposed action affecting the total environmental concerns in and adjacent to the littoral zone, the ocean, and the 'aina of the State of Hawaii including its residents and visitors.

As it currently stands, there is insufficient objective factual basis presented and no realistic alternatives to support the FONSI claims.

Michael Reimer, Ph.D. 
Retired Geologist
GeoMike5@att.net
December 17, 2018 (rev. 12/31/2018)

Comments on the November 2018 Draft Environmental Assessment for Naval Special Operations Training in the State of Hawaii.

Introduction:

Comments included here are by no means exhaustive but simply representative of the deficiencies of this EA.

The information in the EA is insufficient for reviewers to evaluate the merits of the assessment and its proposed alternatives. It appears that very little thought was given to the alternatives as presented. In fact, it is somewhat deceiving that the only significant difference between action alternatives 1 and 2 is the number of training events to be held each year in other Hawaiian Counties (Executive Summary 3, p. ES-ii). These alternatives provide the same climate regime and they become simply an extension of the no-action alternative for which it is stated that training already exists.

The alternatives in this draft environmental assessment (EA) are simply a packaging of the program to levels of big, bigger, and biggest and therefore are not alternatives at all. By failing to fully present a reasonable and meaningful selection of alternatives, this EA is therefore less than genuine in its current form. Thus, this approach completely invalidates this EA. Ironically, thorough and careful reading of this EA easily demonstrates that it gives more support to showing significant impact to the environment than its intent to show FONSI.

The uniqueness of this particular special operations training involves interaction with the civilian population. The explanatory coverage of an environmental assessment or impact statement must not be limited to natural and physical environments (air, water, land, physical structures) but must include its interaction with all living organisms, including humans, within that environment as well as the cultural, social, and economic impacts. This is also a requirement of the Hawaii Environmental Council and HRS 343. http://oeqc2.doh.hawaii.gov/OEQC_Guidance/1997-Cultural-Impacts-Guidance.pdf. This EA fails to sufficiently do so.

The EA suggests that Hawaii is ideal for this type of special operation training because it is a nearly constant warm-weather site (Sec 1-3 p. 1-16). Current training is for the most part in-water training (Sec. 2.5.1 p. 2-32). In effect, from the information in Sec. 2.5.1, this EA is proposing an enormous increase in training to now involve land- and air-based activities elsewhere in the State. Section ES.3 states that there could be up to 265 events per year on federal lands and up to 330 events on non-federal lands.

The EA frequently claims because the training takes place over an extended time period, environmental impacts are temporary and have therefore no irreversible or irretrievable impact (particularly noted in Sections 4 and 5). There is general failure to objectively elucidate the cumulative impact of such training frequency and the EA appears to be ignoring the requirement in 40CFR1508.27 where using an approach of

temporary impact or breaking activities into small parts is insufficient to justify a no impact claim. Spreading out the pollution, the toxins, the interactions and the impacts, whether noise or gases or solids or human involvement, etc., and whether over area or time is contrived justification for claiming no significant environmental impact and nullifies this entire EA.

Certainly, Hawaii Administrative Rule 11-200-12 on determining whether an action has a significant effect on the environment must be considered because much of what is included in the draft environmental assessment claiming FONSI is contraindicated by the Rule.

The EA boasts there are four categorical exclusions (Sec. 2.5.1) allowing such training activities but gives no insight on how that applies to the expanded activities proposed for Hawaii. Thus, they must be considered an invalid application for the new proposed program involving different sites and non-federal lands.

The EA states that Hawaii is different than other areas, such as San Diego, that are currently used as alternative sites (Sec. 2.7), albeit limited times of the year. The assessment seems to suggest that Hawaii is the ideal location for initial training to take place and that intermediate and advanced training will take place in other locations presenting alternative challenges of increasing complexity, often climate related (Sec. 1.3 p 1-17). That reasoning makes Hawaii unique and any claim for generic exclusion is additionally insufficient. Hawaii must be addressed on its own merits. The EA states that the Fleet Concentration area around San Diego was not studied thoroughly (p. 2-41); it becomes, therefore, impossible to extend any information from San Diego to Hawaii.

Training as described in this EA involves multiple sites on multiple Islands in the State of Hawaii. It includes water-based, land-based and air-based training. It includes the use of both federal and civilian controlled lands (Introduction Sec. 1.1, p. 1-1). There are several sections (1 and 3 and appendix A) where maps are presented showing the training areas. In using Hawaii County as an example, the training areas shown on the maps are not consistent with the scale presented (see fig. 1-1 and 1-8). Perhaps there are those who might think that this issue of map scale is trite but most assuredly it reflects the overall lack of attention to detail that should be compulsory for any EA or EIS. A simple but consistent review might have caught this and other contrasting issues.

This EA supposedly assesses federal and private lands for impact. Federal lands are not defined well enough to evaluate the impact. In Hawaii County, there are very large tracts of federal lands not necessarily included in the designated areas as shown on the various island maps, especially those of the National Park Service related to Hawaii Volcano National Park. It must be clearly stated whether or not those lands will be used and how they will be used. Although the other federal lands are not included in the outlines on the map figures, they are not specifically excluded either. In fact, the maps note that the areas marked are only "potential" areas (see, e.g. Fig. 1-8).

Some discussion is presented below using a few issues as examples. As mentioned previously, these are not exhaustive but are representative of the deficiencies in this EA.

Noise:

The tilt-rotor MV-22 Osprey is going to be used. That is one of the noisiest propeller aircraft there is today with sound exposure levels exceeding 100 decibels. In addition, the MV-22 would be flying at a low altitude for its mission, under 3,000 feet (Sec. 3.1.3.2). <https://www.scribd.com/doc/97906932/4-Appendix-%EF%BC%A3-Aircraft-Noise-Study-for-the-Basing-of-MV-22-at-Marine-Air-Station-Futenma-and-Operations-at-Marine-Corps-Facilities-in-Japan>

Fig. 3-16, p. 3-133, dealing with sound levels, shows that anything above about 110 dBA to be in an uncomfortable zone but the finer print notes it is actually painful. In fact, the Center for Disease Control notes that exposure to sound levels above 110 dBA can cause permanent and irreversible hearing loss in a matter of minutes. Higher levels can cause hearing damage in a matter of seconds.

https://www.cdc.gov/nceh/hearing_loss/what_noises_cause_hearing_loss.html

The noise concern is not unique to Hawaii Island as it was also expressed by MV-22 use in Oahu, and any cognizant reviewer of this assessment would be familiar with the noise concerns and alleged problems expressed by the use of the MV-22 in Japan. <https://www.stripes.com/news/noise-not-safety-is-main-osprey-concern-in-hawaii-1.183812>

There also is the safety problem where in Japan the fleet of tilt-rotor MV-22 aircraft has been grounded several times, typically after a crash, and a plan should be in place and detailed for any possible aircraft accidents involving federal and private lands during training in Hawaii. This is a recommendation also presented in the discussion involving Proposed Actions and Alternatives, below.

Of course, this is only part of the risk story related to noise. The frequency (hertz) of the sound is also an important factor. Typical frequencies of less than 100 hertz, such as the rumbling sound of the rotors and the pressure waves it creates extending for many miles and therefore extended duration of exposure to the sound, can cause headaches and emotional strains such as anxiety and depression, as noted with the experience in Japan (*supra*). The EA notes that there has been incomplete evaluation of the noise effects on children (Sec. 3.4.5.1). Further, it is not uncommon for nighttime sound levels to be placed at 10 dBA below daytime levels for similar disturbing effects especially regarding sleep deprivation. At a minimum, the EA should report measured noise levels for the VM-22 aircraft as would be experienced by the public using the sound exposure level (SEL) and the instantaneous maximum sound level (Lmax), *supra*, www.scribd.com.

A major problem exists with the noise calculations. There is a statement that calculations were based on the scenario of aircraft being flown at greater than 3,000 feet and only the MV-22 calculations were for under 3,000 feet. Yet, section 2.4.2.1 states aircraft will be as low as 500 feet, not including landings, and some will hover for up to 15 minutes. This contrast reinforces the claim that there will be significant noise generated by the aircraft involved in the training. Thus, these contrasting scenarios completely contravene the claim of no significant impact.

Overlooked in the presentation on noise is the economic impact that should be part of an environmental assessment, in that the property values are significantly lowered in zones of higher aircraft noise levels. This was the conclusion reached in a thesis research study conducted by an Air Force officer. This applies to all aircraft operations, not only the MV-22. <https://apps.dtic.mil/dtic/tr/fulltext/u2/a446223.pdf>

There is detail lacking on the noise, nuisance, aggravation and privacy incursion caused by the use of unmanned aircraft (including drones) in public areas and this must be remedied with full discussion. That should be included in this EA.

Based on the lack of thoroughness with the noise discussion and its contrast on aircraft use with subsequent impact on citizens, the claim of no significant impact is not supported and, hence, invalid.

Geological Resources:

The EA mentions this term with the comment: "The Proposed Action does not include construction on undeveloped lands or ground-disturbing activities in any undisturbed areas." (p. ES-iii and p. 3-42)

It never appears again with any discussion. This is an egregious oversight. Geological Resources in Environmental Statements include much more than construction activities. The topic can include soils (including beach materials) and their sources, any mineral resources, single source aquifers, human interaction with these sources, and importantly, geologic cultural heritage sites. A shore environment has many of these issues especially in Hawaii. This EA has no discussion of these qualities that are so important to the economic well-being of the State. Coral is an important component to the white sand beaches in Hawaii. There must be a presentation on how the impacts of underwater explosions affect coral health. Many of the beaches in west Hawaii County are not used for boat-related activities and there must be a detailed discussion of how training activities including motor craft landings will impact the beaches. Further, there are numerous fresh-water feeder springs located at the shore line, many emitting into the oceans and creating a unique environment for sea life. There is neither mention of these specialty environments nor mention of any mitigation plan if these environments or, for that matter, any other environments are impacted by the training exercises.

Cultural and Historical Site Impacts:

Cultural concerns are now becoming more frequently addressed in Hawaii but appreciation is still in beginning stages. It is recognized that there are many more cultural sites yet to be identified. The need for specialty trained individuals familiar with cultural sites was presented in a 6 November 2018 letter from Navy Captain Delao to Dr. Kamana'o pono of the Office of Hawaiian Affairs concerning Navy land-based training in the Hamakua District, Island of Hawaii. This EA is addressed to training exercises, and notes that trained observers will be present to judge how the training is progressing. As such, these observers and even the trainee participants should be proficient in how to recognize cultural sites, including geological cultural sites that may have provided source material for daily living undertakings and spiritual activities. These specific recognition abilities are not addressed in the current EA. Guidance is provided in the Delao letter regarding training on the Hamakua Coast.

In addition, there is no identification or mapped location presented for existing recognized sites and no plan is given to address these and as yet to be discovered sites. Certainly, the identity and credentials of the personnel involved in the cultural aspects should be provided. In fact, it would be a benefit to the program if civilian observers knowledgeable with Hawaiian historical cultural activities and site identification were retained to oversee the training activities. It is incredulous that the numerous sacred sites, such as Pu'ukohola Heiau and the many petroglyph sites within the Big Island proposed training areas are not even mentioned. The EA provides no supporting information that the requirements of 32CFR800.4 have been or will be dutifully followed, including 32CFR800.4(a)(3) where individuals with concerns of historic properties should be contacted. Certainly, public meetings held near a population center or centers of the proposed impacted areas would be desirable and help to address the requirements of 32CFR. By these omissions of cultural concern, the no-action alternative is the only reasonable choice.

Air Quality:

In section 3.1.2, it is stated that "The State of Hawaii has some of the highest air quality in the country." It is further noted that the training operations will be releasing some pollutants and that at least two of them, CO and VOC, will exceed significant emission rates (Table 3-3, 3-4, and 3-5).

That does not seem to concern the Navy in this EA even though its related mandate is touted in section 3.1.1.3.1, whereby the Navy will reduce its reliance on fossil fuels to be good stewards of the environment. That may be admirable but it pales in comparison with the goal set in Hawaii to achieve 100 percent clean energy use by 2045 (<http://www.hawaiiicleanenergyinitiative.org/>). Rather, the EA claims that because the emissions are from equipment that is mobile, it is not a stationary source of emissions and therefore is not a problem to comply with regulatory exemption.

This is not a thorough approach and the Navy could do better. It is interesting that in Table 3-3, there is shown excess emission for the no-action alternative as well as higher excess emissions for alternatives 1 and 2, as would be expected. The rationalization given for the claim of no significant impact is that these emissions amount to only 0.00004 percent of the total yearly U.S. greenhouse gas emissions. That number is quite measurable and can also be expressed as 400 parts of a billion and that is not insignificant. For an apples-to-oranges comparison but useful to give perspective to quantities when expressed in the part per billion range, the U.S. EPA primary drinking water standard for arsenic is 10 parts per billion and for mercury, just 2 parts per billion. (<https://www.epa.gov/ground-water-and-drinking-water/national-primary-drinking-water-regulations>). Another point to be recognized is that the pollution is initially site specific and can cause local impacts over a short time period before it is diluted by air movement and distance.

As written, this section on air quality can generically imply a very disturbing justification for release of various gases that this training program would create. In effect, it notes that Hawaii has superb air quality (Sec. 3.1.2) and so the release of some polluting gases from the mobile sources would still leave the air under the USEPA action standards for pollutants and still be less than the general air quality of the contiguous states (Sec. 3.1.3.2). That is not quality stewardship.

EAs and EISs are required to have a section on air quality and that includes the greenhouse gases. That requirement is a *de facto* recognition of the global problems that can be caused by the increase in those gases. It is important to minimize the release of the greenhouse gases whether it is from large fossil-fuel burning power generation facilities or simply the emissions from one fossil-fuel burning engine. To do otherwise strongly contrasts with the Navy's own guidelines to minimize air pollution from fossil fuels (Sec. 3.1.1.3.1). As the Navy notes that Hawaii has some of the cleanest air in the nation (Sec. 3.1.2), it should strive to keep it that way. With the Navy stating that it wants to be a good steward of the earth and with lack of consistency in this section, that would suggest that the only reasonable alternative for implementation is the no-action alternative.

Proposed actions and alternatives:

Section 2 discusses proposed actions and alternatives. There are many issues in this section that are lacking sufficient information so that any conscientious reviewer can understand what is being presented and make comments based on thorough and complete disclosure of information.

There are three elements presented for the training: water-based, land-based and air-based. Each one has a significantly different impact on the environment but all are in some ways related in that there are common training goals.

One of the initial elements presented is that training would involve the use of simulated weapons and the use of paint balls as projectiles, except in one area involving Oahu (Sec. 2.1 p. 2-22) where actual live fire will occur. For this training as presented, there really is no need to carry weapons, real or simulated. In any case, paint balls are still projectiles and can cause harm. It would certainly be more prudent to use the newer technology of laser simulated weaponry. This option should have been discussed. Table 2-1 only lists one activity as possibly needing armament, as the rest merely deal with insertion and extraction activity, so there is no need for weapons, real or simulated, and they should not be used.

There are several sound reasons for this elimination of weaponry. First and foremost is that these training activities are to be conducted in areas where there is significant civilian population in the training zones. Armed troops moving among the population with weapons at the ready will cause extreme anxiety and fear. For an actual example of the panic such presentation can cause, one need only recall the false incoming missile alert issued in Hawaii early in 2018. In a generic example of a worst case scenario, suppose there are civilian individuals who have been properly issued carry permits and see this situation of armed individuals, conclude there is a possible mass shooting event about to occur, and intervene with what could be termed deadly force. It is too risky for trainees and the civilian population for any real or simulated weaponry to be used in this training.

A second concern is that it is stated that there will be an emergency vehicle and a medical corpsman on hand during training exercises. One vehicle and one medic (as referred to in Table 2-6) are hardly sufficient when there are up to 46 troops involved (p. 2-26) let alone risks among civilian population from low-flying aircraft with a higher than average accident profile. At a minimum, there needs to be many more emergency vehicles present including provision for emergency air-lift transportation (flight-for-life capability), additional highly-trained personnel at least the EMT-P level as perhaps physicians as well, and a complete plan to obtain assistance from local civilian first responders in event of need. Certainly there needs to be a process of advanced notification to those responders of the training schedule so that timely and adequate preparations can be made. The EA failed to discuss if the military corpsmen and staff have the authority to treat civilians.

Third, it is stated that some of the activity will involve building clearance exercises (Table 2.1-1 and Sec. 2.1.3.3). There are very few structures, other than civilian private homes, in the areas where the activity is proposed on the Big Island. The structures on government controlled land are associated with beaches and consist of lavatories, change facilities, and in the case of Kaloko-Honokohau National Historical Park and some other state parks or monuments there may be a few offices and visitor facilities. For the most part, these areas are considered sacred sites and should not be involved in any military training exercise. There are structures, stores and shops, at Kawaihae and Honokohau harbors but the constant presence of civilians should negate any thought of using them for clearance exercises. Federal land use is poorly defined and

prevents a full assessment of the environmental impact regarding this building clearance training.

Fourth, there is repeated mention that the areas described are “potential training areas,” for example, the caption of Figure 1-8. This certainly needs clarification. There are many federal lands on the Big Island. A reasonable question is, ‘Have they been considered to be used for training?’ There are vast lands associated with the Hawaii Volcanoes National Park and many structures are present. In addition, there is Kilauea Military Camp with its structures. The question can continue, ‘Are those areas being considered for the training activities discussed in this EA?’

The land-based activities that are part of expansion presented in alternatives 1 and 2 completely ignore reasonable alternatives even in Hawaii. Pohakuloa Training Area of over 133,000 acres, including an airfield, cantonment area, and various battle area complexes, could easily be used for land- and air-related activities including parachute drops. That would keep the land-based training already on-land defined for military training issues. If civilian interaction is to be part of the training, then soldiers can be used in simulated roles of civilians. That would greatly reduce the health and safety risks to both soldiers and the public. Also missing is the obvious use of the windward side of Hawaii Island providing the diversity of locales that are claimed to be needed. Of course, the reasons given for diverse training locales do not ring true. The following commentary is a good example of how the EA falls short of providing sufficient information for review and fails to consider alternatives within its own framework of conditions.

The operations described in this EA are already taking place in Oahu and San Diego. The NSWC states that Hawaii is to be used for initial training based on its mild climate being a better and less rigorous introduction for the special skills being taught to what might be a novice or new recruit group of trainees (p. 1-17). Climate seems to be the primary factor in selecting training sites. The current program seeks expansion into other areas in Hawaii to avoid the familiarity of an area that could cause anticipated behavioral responses. The reasonable question here is, ‘Once the trainees have had initial exposure and move on to more complex training, why is there need for additional sites in the same climate zone as already provided in Hawaii and San Diego?’ The EA fails to adequately discuss this conundrum and gives the appearance that this is just a land grab because insufficient thought beforehand had been given to the requirements needed for the training. Once a trainee class has “graduated” from the initial climate training site, the issue of site familiarity is moot. There is no discussion that refresher training in the same area, perhaps separated by years, would be a detriment to an already acquired skill set.

For better diversity within similar climate conditions, why not consider Guam or the Philippines or the Caribbean where U.S. military bases are already located? Such locations would provide better warm climate diversity and deal in a more satisfactory manner with the concerns expressed in Section 2.4 addressing area screening issues of training, safety and logistics, especially the comment that, “Due to the unique training

and operational requirements for naval special operations personnel, the proximity of secured Navy facilities/installations is critical." The distance from Pearl City to Kailua-Kona is about 280 kilometers. Pearl Harbor to Tripler Army Medical Center is a lot shorter distance. One might reasonably argue that the leeward coast of Hawaii Island is not proximal to secured naval facilities.

Nowhere is this enigma better presented than in the EAs discussion found in Section 1.2.

"Facilities and topography on military bases/federal land is often different than that found at off-base locations. Because the nature of naval special operations requires them to operate worldwide, often times off military installations, it is imperative that their training provides this diversity and replicates real world environments; therefore, the use of non-federal land is imperative for training purposes."

It is very clear from the above paragraph that military bases have locale diversity. It is never shown that such military base diversity cannot adequately accomplish the required need for training missions without the need for non-federal land usage except perhaps for the presence of non-consenting civilians.

The EA states that training will involve insertion and extraction in a stealth manner and involve movement of troops with the objective of avoiding detection of their presence (Sec. 2.1.3.2). It seems somewhat incongruous that if insertion is by powered boat, Jet Ski, helicopter, MV-22, or parachuting, that the insertion will go unperceived. It will be an immense challenge not to leave any footprint in the sand at the beach. This claim of no residual trace of trainee presence needs clarification as does the true nature for the need of the presence of civilians.

Once basic technical skills have been achieved, such as swimming and rappelling and parachuting, etc., most of what has been described for insertion and extraction would be better conducted with virtual reality, where probable sites needing this type of intrusion could be mimicked. That would ensure superior environmental protection for Hawaii.

There is one proposed action that is particularly disturbing and cannot under any circumstances justify a finding of no significant impact to the environment. I mention it here for the reviewers of this document to conclusively see my concern that this EA is completely insufficient, teeming with internal contrasts, and in conflict with common sense.

The action is the use of Long Range Strike Weapon Systems, Sec. 4.3.2.2.

"Detonations associated with this program would produce underwater noise and explosions; however, due to shallow detonations, it is not anticipated that cratering would occur at the seafloor. Metals would sink, disperse, or bind to sediments. Individual fish in the area may be killed by the strike or the associated pressure bubble. An Incidental Take Authorization for marine mammals and sea turtles (hawksbill,

loggerhead, olive Ridley, leatherback, and Central North Pacific distinct population segment of green sea turtle) was issued for the 2016 event, and a similar Authorization is anticipated for the 2017–2020 tests.”

Such environmental devastation particularly in proximity to civilian areas has no place in any program where claims of good stewardship are touted and the ultimate goal of the EA or any EIS is to show there is to be minimal impact to the environment. Contrast this proposed action with a comment from a sentence in Sec. 3.1.1.3.1, “The Navy is committed to improving... environmental stewardship.”

Safety and consent of public:

Section 3.6 of the EA discusses the issue of Public Health and Safety. It states in the first paragraph, “This discussion of public health and safety includes consideration for any activities, occurrences, or operations that have the potential to affect the safety, well-being, or health of members of the public. The primary goal is to identify and prevent potential accidents or impacts on the general public.”

While it has a focus primarily on children, and mentions Executive Order 13045 related to the safety of children, this EA is completely lacking in presenting a discussion on the total impact of the proposed training on the public. It declares that children are not disproportionately affected by this activity but provides no supporting information. A review of the EA sections on noise will show many instances where noise specifically affects children. Making a blanket statement about no significant impact is insufficient justification.

“Operational safety may refer to the actual use of the facility or built-out proposed project, or training or testing activities and potential risks to inhabitants or users of adjacent or nearby land and water parcels. Safety measures are often implemented through designated safety zones, warning areas, or other types of designations.” (Sec. 3.6, *supra*).

There is no question that this proposed training, particularly the stealth options, intentionally involves members of the public. The training includes not only individuals who are learning techniques, specifically the trainees, but the observers to evaluate the process and to provide safety options for the public, such as that described in section 3.6.3.2. However, the EA completely overlooks the necessity of full disclosure to the public of its participation. At a minimum, there should be an entire section in the EA devoted to notification procedures, not only to local authorities but to the public of when the training activities will be and are continuing. This alert to the public may help avoid some otherwise dangerous situations.

When the public is involved as part of the training program, it should not be as unwitting participants. Although it is unfortunately not discussed in this EA but should be, as the training is to be among civilians, there will be some noticeable reaction of the civilians

providing a basis for typical research-oriented observation into their behavior. This is confirmed by the acknowledgement that the military observers and safety support staff will be present (Table 2-6) and anticipating this civilian interaction and reaction in order to make possible interventions about the training progress (sec 1.1, p. 1-2). The civilians are therefore human subjects involved in the training exercises and the EA must discuss this involvement and how it is addressed; but the EA neglected to do so.

The notification actions required are covered under what is referred to as the "common rule" and involvement and requirements are covered by declarations, agreements, and regulations on international and national levels to which the U.S. is a participant. These include the Nuremberg Code of 1947, the Helsinki Declaration of 1964 (rev. 1975, 2002), and the Belmont Report published in 1979, and the Cold War Era Human Subject Experimentation Congressional Hearings of 1994. The ethical principles regarding respect, beneficence, and justice must be applied. Above all, the voluntary consent of the human subject for participation is absolutely essential. Interestingly, the development of these principles is repeatedly inferred by the Nuremberg Code in which a claim of national security is not given an automatic exemption. In fact, the EA does not provide any information on if a waiver was implemented nor does it address responsibilities as required by 32CFR219 for this publically declared, non-classified training program. In addition, lack of a specific informed consent document cannot be considered as giving consent and anyone can withdraw or decline from participation even after consent is given (32CFR219(a)(8)).

The issue of informed consent is not a trivial matter. Because this training involves the public, certain steps must be taken to make the public aware of their participation. The individuals must be given sufficient information on the procedures, purposes, risk and benefits, alternative procedures, the opportunity to ask questions, and to have the agency responsible for the project identified. Ambiguity should be avoided and the probability and magnitude of risks presented. Clearly, for children, there must be a responsible parent or guardian to give consent. The EA acknowledges the Navy is aware that the areas proposed for training include lands used for public recreation (Sec. 3.2) so it is not incidental public contact that is engaged in this training program but intentional and planned contact that is actually part of the program.

The EA states that there is no need for involvement by public law enforcement agencies (Sec 4.4.6.3). Given that the public is involved with these training risk scenarios, public first responders should be intimately involved. Therefore, the claim in the EA of not needing participation of local law enforcement and other community emergency services is specious and must be revised with specific detail provided.

In addition, there is the issue of privacy. Here as proposed, the public will be involved but there is no discussion of the privacy issue. Presumably with today's technology, there will be multiple recordings, video, audio or even written notes of the activities. As that includes the public, there must be some protection of their privacy and no privacy declaration is included in this EA.

The no-action alternative suggests that some of these stealth training activities are already occurring. There should be a review of those activities to ascertain that there is proper citizen consent as this issue is now presented in this commentary and brought to the attention of the military and EA preparers.

In any case, there needs to be a full and open discussion of why it is necessary to have public involvement in the proposed training operations. The EA lacks this discussion and should be summarily rejected because of slighting this important issue.

Notification and Distribution:

The distribution list provided at the end of this EA (Section 7) is certainly incomplete. The various County Councils should be notified as well as other relevant County officials (Mayors, County Councils, real estate and zoning commissions, etc.). In addition, the State Department of Business, Economic Development and Tourism is missing from the distribution list yet it is listed in the references (Section 8). This is certainly important regarding training activities taking place in areas heavily used by the visitors to Hawaii.

Summary:

The issues presented here in this commentary express concern regarding numerous environmental impact levels.

Given the deficiency of detail, the generalities, the abundance of conflicting statements, the lack of cooperative contacts, the avoidance of presenting available metrics for justifying no-impact conclusions, failure to discuss the need for civilian participation, absence of genuine alternative scenarios, and the use of non-consenting human subjects, this EA gives the full appearance of being used to avoid the preparation of a full environmental impact statement. It uses the EA as a convenient platform to declare the mantra of "finding of no significant impact" (FONSI) when in most instances presented here, that is an unsubstantiated, unjustified, and unproven claim. The mission in Hawaii described in this EA is not merely a simple expansion of an existing program but an entirely new proposal as it involves new areas and new training competencies; as such, an EA is an inappropriate document for description.

There is a complete lack of discussion of alternative areas that can be or are being used for this type of training and no substantive reasons given for why Hawaii needs to be the only area for this new program. Because the EA indicates that these training activities are already occurring, that suggests that there are alternative areas already in use, and they may not necessarily be in Hawaii.

In conclusion, this EA is woefully incomplete thereby negating any reasonable review of environmental impact and as such, the only operational alternative is the no-action

alternative. Given the quality of presentation demonstrated in this EA, it is doubtful that a full EIS would provide better explanation and basis for review. There are so many deficiencies in this EA as to render the entire document inappropriate for its intended purpose. In fact, it gives greater support for demonstrating significant impacts to the environment that cannot be erased by attempting to distribute the impacts over time and area and avoid a realistic determination of cumulative impact. In addition, from what is presented in the EA, often signaling the conflicting and indefensible aspects of the training program, the entire training program needs to be reevaluated. What is presented indicates a very poorly designed program that gives the appearance of being completely unnecessary in other areas of Hawaii and a peril to public health and safety. In effect, actions described in this EA are untenable and should be abandoned.



DEPARTMENT OF THE NAVY

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April 12, 2021

Carl F. Miller (carlfmiller@gmail.com)

Dear Carl Miller:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and State Historic Preservation Officer, coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

Naval Special Warfare Command (NSWC) has done an extensive search for sites within the training study area that meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2), an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including the monk seal and its critical habitat. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Carl Miller.

Copy to: Hawaii Department of Land and Natural Resources

55-807 Keahlooe Place
PO Box 190674
Hawi, HI 96719

December 4, 2018

Meagan Ostrem
ManTech International Corporation
20 Stevens Ave., Suite 300,
Solana Beach, CA 92075

Dear Ms. Ostrem:

As I am sure you are hearing from nearly all of Kohala on the Big Island of Hawaii, the plan to conduct military exercises on the Kohala Coast is ill-advised and must be terminated. I am writing to add my voice to this dissent and urge ManTech to take or recommend whatever action possible to terminate or modify the plan to conduct the many events planned for the Kohala Coast in 2019 and beyond. This includes a requirement for a full EIS which has not been submitted, and which will fully expose the folly of the Navy's proposal.


I am a resident of North Kohala, and operate a commercial sailboat charter operation from Kawaihae harbor. I see this plan for military invasions as a threat to our business as well as our beautiful coastline. Further impact inland on road congestion and damage cannot be avoided by the military, and this in turn will negatively affect the tourism business so critical to our economy.

Everyone is aware of course that this ocean area is a federally-designated humpback whale sanctuary and that the heavy invasion of ships, planes, helicopters, and submarines into the environment cannot be tolerated in the sanctuary. The Kohala coastline above Kawaihae is pristine and any personnel exercises on coral, beaches, and rock cliffs will be permanently detrimental to the area. Pollution of all types cannot be avoided in these exercises. Local activities such as boating and fishing will be disrupted, with additional damage to fragile economic activities such as charter excursions on sail and fishing boats.

A full Environmental Impact Statement must be conducted. It will make you, the Hawaii DLNR, and the military aware of these issues and therefore aware that the hundreds of exercises proposed is outrageously contrary. I agree with others that it is "crazy and irresponsible" of the military to propose such a heavy load on our environment.

In this respect, the people of North and South Kohala all want the military to "stand down" from the plan to conduct these heavy-duty exercises in our beautiful front yard. There are other options open to the military planners, among them use of over 400,000 acres elsewhere on the Big Island. We all agree training is necessary, but we must NOT allow the military's bad reputation for environmental damage to get any worse. Therefore, I hope ManTech will take immediate and firm action in response to the many loud and sincere objections and written dissent and public petitions being aimed at the misguided plan for these exercises, and cause the Hawaii DLNR and US Navy to call them off at once.

Sincerely yours,



Carl F Miller
Manager, Pua Ka Ilima Charters, LLC
Hawi, Big Island



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Humble, Olson, Anderson, Stanbro, and Cole Families (return address not provided)

Dear Humble, Olson, Anderson, Stanbro, and Cole Families:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and State Historic Preservation Officer, coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the preferred alternative as described under Proposed Action (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an EIS would not be required.

The proposed Naval Special Warfare Command (NSWC) activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence during and after proposed training activities. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather and land/warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site.

5000-45E
N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 28, 2018 comment letter from the Humble, Olson, Anderson, Stanbro, and Cole Families

Copy to: Hawaii Department of Land and Natural Resources

WE ARE TOTALLY Dec 28
2018
 AGAINST ANY SHORE TO SEA
 COASTAL USE OF THE MILITARY
 OFF THE KONA OR KOHALA
 COAST.

THE MILITARY HAS ALREADY
 RUINED ~~ONE~~ BEAUTIFUL AND
 HEALTHY COASTAL AREAS FOR
 "MANEUVERS". STAY ON THE
 PLACES YOU HAVE ALREADY
 KILLED. KEEP USING THEM.

OUR COAST IS SO FRAGILE
 AND SO FEW ENTRY AREAS.
 YOUR STUDY IS SO FLAWED IT
 DOES NOT EVEN MENTION OUR
 TOURIST INDUSTRY OR HUMPBACK
 WHALE BIRTHING AND MATING.

DO NOT DO TO THE BIG ISLAND
 WHAT YOU DID TO KAUAI AND
 OTHERS. HUMBLE FAMILY ANDERSON
 OLSON FAMILY FAMILY
 STANBRO FAMILY
 COLE FAMILY



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 6, 2021

Michael Yee
Planning Director, County of Hawaii
101 Pauahi Street, Suite 3
Hilo, HI 96720
planning@hawaiiicounty.gov

Dear Michael Yee:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process and for your letter of January 7, 2019 providing us with your subject comments. Subsequent to receipt of your letter, on February 7, 2019, Navy representatives met with Mayor Kim and some of his staff and department representatives in Hilo to hear and address concerns. Your Deputy Director, Mr. Duane Kanuha, attended this meeting. The information provided below is the same as the information shared during the meeting and is being provided in support of Hawaii Revised Statutes 343 compliance.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolition, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. As stated in the Draft and Final EAs, the proposed training does not include off-road driving. Pickup trucks and/or a van would be driven on roadways to the training site by support staff and parked in designated parking locations. Road use by NSWC would be the same as road use by the public.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increase in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices (BMPs), including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials or waste would not be generated or released into the environment under the Proposed Action. Under the Proposed Action, military expended material such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training and expended batteries would be recycled or disposed of properly after returning from training activities through existing characterization, recycling, and disposal programs.

Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the proposed training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (Table 2-4 of the Draft and Final EAs).

As described in Chapter 3, all potentially relevant environmental resources were initially considered for analysis in the Draft EA. In compliance with NEPA, Council on Environmental Quality, and 32 Code of Federal Regulations Part 775 guidelines, the discussion of the affected environment (i.e., existing conditions) focuses only on those resources potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places, including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer, and 62 Native Hawaiian Organizations, historic partners, and the public. Correspondence regarding the National Historic Preservation Act Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

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SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Michael Yee.

Copy to: Hawaii Department of Land and Natural Resources

Harry Kim
Mayor



Michael Yee
Director

Duane Kanuha
Deputy Director

West Hawai'i Office
74-5044 Ane Keohokalole Hwy
Kailua-Kona, Hawai'i 96740
Phone (808) 323-4770
Fax (808) 327-3563

County of Hawai'i
PLANNING DEPARTMENT

East Hawai'i Office
101 Pauahi Street, Suite 3
Hilo, Hawai'i 96720
Phone (808) 961-8288
Fax (808) 961-8742

January 7, 2019

Samuel J. Lemmo
Department of Land and Natural Resources
Office of Conservation and Coastal Lands
P.O. Box 621
Honolulu, HI 96809

Dear Mr. Lemmo:

SUBJECT: Draft Environmental Assessment (DEA) 30-Day Comment Period
Project: NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII
TMKs: Various Locations, State of Hawai'i (including island of Hawai'i)

The County of Hawai'i Planning Department offers the following concerns regarding the DEA for the Naval Special Operations Training in the State of Hawai'i. Please accept these in addition to other correspondence from the County Planning Department¹.

1. The DEA appears to be incomplete per HAR Sec. 11-200-10(3)². Hawai'i County was not consulted³ in making the assessment and has not been formally notified via the distribution list for the proposed action⁴.
2. The DEA appears to be incomplete per HAR Sec. 11-200-10(12)⁵. No early consultation was undertaken with Hawai'i County Planning Department; the advice and input of the county agency responsible for implementing the Hawai'i County General Plan did not occur and no consultation was provided.
3. The DEA appears to be incomplete per HAR Sec. 11-200-10(11)⁶. The DEA represents an insufficient analysis of County of Hawai'i permit and approval requirements.

¹ Reference Section 106 letter from Planning Division/CRC

² "Identification of agencies...consulted in making the assessment"

³ HAR 11-200-9(a)(1)

⁴ HAR 11-200-9(a)(6)

⁵ "Written comments and responses to the comments under early consultation provisions of sections 11-200-9(a)(1), 11-200-9(b)(1), or 11-200-15, and statutorily prescribed public review periods"

⁶ "List of all permits and approvals (State, federal, county) required"

ENCLOSURE

Mr. Sam Lemmo
January 7, 2019
Page 2

In the absence of the above required contents⁷, the Hawai'i County Planning Department is unable at this time to provide comprehensive comment, assessment or determination(s) of how likely the action may have a significant effect on the environment⁸.

We look forward to reviewing and commenting on the proposed action once a "full and complete consultation process" is undertaken that does "not rely solely upon the review process to expose environmental concerns"⁹.

If you have any questions, please contact Kevin Sullivan of this office at (808) 961-8135.

Sincerely,



MICHAEL YEE
Planning Director

KS:rl

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⁷ HRS 343-6: Rules

⁸ HAR 11-200-12, HRS 343

⁹ HAR 11-200-15



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 6, 2021

Kailapa Community Association
61-4016 Kai 'Opae Place
Kamuela, HI 96743

To Kailapa Community Association:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources) and Table 5-1 (Principal Federal and State Laws Applicable to the Proposed Action) in Section 5.1 (Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions), provides a summary of the compliance status for applicable laws and regulations.

At the time of the Draft EA, some consultations had begun and other consultations were planned but had not yet occurred. Consultations have since occurred and are completed with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, State of Hawaii Office of Planning for Coastal Zone Management Act compliance, and the State Historic Preservation Officer. Please see Appendix A (Agency Correspondence) of the Final EA for associated correspondence and consultation documents.

As described in Chapter 3 (Affected Environment and Environmental Consequences), all potentially relevant environmental resource areas were initially considered for analysis in the Draft EA. In compliance with NEPA, Council on Environmental Quality guidelines, and 32 Code of Federal Regulations Part 775 guidelines, the discussion of the affected environment (i.e., existing conditions) focuses only on those resource areas potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Under the Marine Protection, Research, and Sanctuaries Act (16 USC section 1431 et seq.) (also known as the National Marine Sanctuaries Act), the Secretary of Commerce may establish a national marine sanctuary for marine areas with special conservation, recreational, ecological, historical, cultural, archaeological, scientific, educational, or aesthetic qualities. Once a sanctuary is designated, the Secretary of Commerce may authorize activities in the sanctuary only if they can be certified to be consistent with the National Marine Sanctuaries Act and can be carried out within the regulations for the sanctuary. Regulations exist for each sanctuary, and military activities may be authorized within those regulations.

Section 304(d) of the National Marine Sanctuaries Act requires federal agencies to consult with the Office of National Marine Sanctuaries whenever their proposed actions are likely to destroy, cause the loss of, or injure a sanctuary resource. The Hawaiian Islands Humpback Whale National Marine Sanctuary is a single-species managed sanctuary, composed of waters around Maui, Lanai, and Molokai; and smaller areas off the north shore of Kauai, off the Island of Hawaii's west coast, and off the north and southeast coasts of Oahu. All of the proposed naval special operations training activities that would occur within the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final Environmental Impact Statement (EIS)/Management Plan for the Sanctuary, which under the Hawaiian Islands Humpback Whale National Marine Sanctuary regulations do not require permits or further consultation under Section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The proposed training activities addressed in the Draft and Final EAs are the same classes of activities previously analyzed in the Navy's 2013 and 2018 Hawaii-Southern California Training and Testing (HSTT) Final EISs/Overseas EISs and for which the Office of National Marine Sanctuaries found no consultation was required. The activities proposed in this EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 HSTT Final EISs/OEISs and, therefore, consultation is not required.

As stated in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs, trainees would avoid animals in the water, such as Hawaiian monk seals and sea turtles, and would not approach animals resting on the beach. When in the presence of whales, personnel would shut down boat engines in accordance with boating regulations and Navy procedural instruction. Vessels used in training would not bottom out or come ashore in sensitive habitats, such as coral. When training on land, sensitive habitats, such as known bird nesting areas, would be avoided.

The Navy has identified several historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. The training study area is larger than the actual area that would be used for the proposed training due to the training's sensitivities and would be limited to smaller sites on federal land and on state and private lands that have the consent of property owners before training activity occurs. Training activities would not interfere with public use of land or water areas for recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

As stated in Section 3.5 (Noise) of the Draft and Final EAs, training activities would generally occur away from residentially zoned areas and the operational conditions of training activities is to remain undetected and leave no trace of presence during or after the training. No air-based training is proposed on Hawaii Island. Overall, the non-invasive nature of the naval special operations training activities (e.g., intent to remain undetected, no live-fire, no construction, no digging, no fires, no human waste) would have minimal effects on the environment because of the short duration, infrequency of occurrence, and low intensity of the proposed training activities. Because the goal of training is for the trainees to be in the field undetected, the environment would be minimally disturbed and materials (e.g., gear and trash) would not be left behind.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on

deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health’s website.

Sincerely,

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SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Diane Kanealii and Wyman Dummondo, Kailapa Community Association.

Copy to: Hawaii Department of Land and Natural Resources



January 6, 2019

Naval Facilities Engineering Command Pacific
 Attention: Project Manager, EV21.JZ
 258 Makapala Drive, Suite 100
 Pearl Harbor, HI 96860-3134

Re: Draft Environmental Assessment (DEA) for Naval Special Operations Training, State of Hawaii, November 2018

Dear Naval Facilities Engineering Command Pacific,

Please consider this correspondence as public comment on behalf of myself and the Kailapa Community Association representing 150 homes in the Kawaihae region of Hawaii. Island regarding the DEA for expanded Navy Special Operations (SpecOps) training in the State of Hawai'i, specifically along Hawai'i Island's Kona and Kohala coasts. As a resident and community leader we are opposed to the proposed training in West Hawaii.

The Navy's DEA is not in compliance with current National Environmental Policy Act (NEPA) regulations, as outlined below. Beyond the Navy's lack of compliance with NEPA, there are a number of reasons why the Navy's plans for expanded training on the west coast of Hawai'i Island are inappropriate, due to the negative impacts on the area's natural and cultural resources and on the community. This expansion of military training to non-federal lands across the state under the guise of "training scenario variety" is nothing more than a thinly veiled effort to increase the military's already expansive footprint across the Hawaiian Islands. This proposed expansion is unnecessary, bad for the environment and the community, and extremely unpopular with the local population. The military has yet to fully clean up all of the possibly live munitions left on our coastline and land through Waimea from previous trainings making it very difficult and in some cases impossible for homesteaders to utilize the lands set aside for Native Hawaiians. Furthermore:

A. The Navy's proposed training study areas lie within the boundaries of the Hawaiian Islands Humpback Whale National Marine Sanctuary (HIHWNMS) around the islands of Hawai'i, Maui, Moloka'i, Lana'i, and O'ahu. As required by both NEPA (40 CFR § 1501.2 "Applying NEPA early in the process" and 40 CFR § 1501.6 "Cooperating Agencies") and the National Marine Sanctuaries Act (NMSA) [Section 304(d) / 16 USC § 1434(d) "Inter-agency Cooperation"], the Navy is required to formally consult with the Office of National Marine Sanctuaries (ONMS) at the earliest possible time in the preparation of any NEPA documents. There is no evidence of such consultation in the DEA. It does not list the NMSA in Section 1.6 "Relevant Laws and Regulations", and the DEA only mentions consulting with the U.S. Fish & Wildlife Service (FWS), the National Marine Fisheries Service (NMSF), the State of Hawai'i Office of Coastal Zone Management (OCZM), and the State of

61-4016 KAI 'OPAE PLACE • KAMUELA, HAWAII 96743 • PHONE/FAX 808.880.9798

ENCLOSURE

Hawai'i Historic Preservation Division (SHPD). Failure to comply with both NEPA and NMSA invalidates the current DEA.

B. The DEA states that a number of resource areas were not addressed in DEA because the potential impacts of the Navy's SpecOps training would be "negligent or non-existent". The fact that the Navy did not even analyze the impacts on water quality or of underwater noise is truly mind-boggling nor the damage to corals from blasts, and ordinances floating down to the bottom of the shallow ocean floor. This further degrades the health of our ocean resources which we depend on for food. NEPA requires all federal agencies proposing an action "significantly affecting the quality of the human environment" to conduct a detailed analysis of the environmental impacts of the proposed action. How does the Navy know its proposed actions will have negligent or non-existent impacts if it doesn't even analyze them?

- Hawai'i Island's west coast waters are among the cleanest, clearest and most biologically diverse in the state. Especially along the coast from Kawaihae to Mahukona, the lack of development, terrestrial water run-off, and convenient access make this area an incredible treasure of unspoiled habitat. The reefs are vibrant and healthy and full of marine life. This particular coast, along with areas around Maui, is also one of the primary breeding areas for humpback whales, who are often seen within yards of the shoreline. This coastline exists like this because of State and local government and community efforts to keep it this way, a task becoming ever more difficult against the pressures of continued development and the impacts of global climate change. Hawai'i Island coral reefs have seen several bleaching incidents in recent years due to increased ocean temperatures; it's critical that stressors on the marine environment be kept to a minimum in an effort to minimize future bleaching events.
- Though the Navy continues to discount the impacts of underwater noise on marine life, especially marine mammals, valid scientific studies have consistently documented the harmful effects of anthropogenic noise on marine animals, including alterations in behavior and permanent or temporary hearing loss, which likely have contributed to the many mass stranding events in recent years. Bringing more underwater noise to the one of the primary humpback whale breeding grounds, and where spinner dolphins, the endangered Hawaiian false killer whale, and the critically endangered Hawaiian monk seal live, is just not a positive development for these species.
- Contrary to the information provided in the DEA, critically endangered Hawaiian monk seals do often inhabit the shallow waters of the proposed training areas as they access the shoreline. The Big Island's Kohala coastline has many popular haul-out locations for the monk seal due to the inaccessibility of much of the coastline to human activity.

A significant increase in Navy training operations in these areas will only have negative impacts on the marine environment, both in the short term and cumulatively.

C. The Navy's Best Management Practices (BMP) for Naval SpecOps training in Table 2.6 state that "If marine mammals or ESA-listed marine species are noticed within 50 yds. (45.7 m) of the training activities, training may continue only if, in the best judg-

ment of the marine species observer, the activity would not affect the animal(s).” This practice is direct conflict with HIHWNMS regulations requiring everyone to always remain 100 yards away from humpback whales. In addition, the BMPs for air-based training activities in Table 2.6 fail to mention both the ESA and HIHWNMS regulations requiring aircraft to remain at least 1,000 ft from humpback whales at all times.

D. The DEA’s analysis of potential impacts to cultural resources is woefully inadequate with regards to Hawai’i Island. The document makes absolutely no mention of the Ala Kahakai Trail, designated in 2000 and administered by the National Park Service (NPS) for the preservation, protection, and interpretation of traditional Native Hawaiian culture and natural resources. The Trail, a recent addition to the National Historic Trails program, runs right through the entirety of both proposed training areas on Hawai’i Island’s west coast. Aside from Lapakahi State Historical Park, the DEA also fails to mention the hundreds of Native Hawaiian cultural sites along the South and North Kohala coast. Just because a location is not on a federal or state list of ‘historical sites’ does not mean a place lacks profound and lasting cultural value to the local population. The DEA also ignores the rich terrestrial and sub-marine history of Mahukona in North Kohala, the terminus for the sugar cane train and loading port for vessels transporting the sugar cane around the state. The waters around Mahukona, in addition to being rich with coral reefs and marine life, are also home to a trove of historical artifacts from the sugar cane era. The Kohala coastline is also home to numerous hiking trails and ocean access points used daily by locals and tourists alike. Mahukona is a primary access location for swimmers, snorkelers, paddlers, etc., and is a popular community gathering place most every day of the week.

E. In addition to ignoring most of the important historical and cultural resources along Kona and Kohala coastlines, the DEA completely fails to address the impacts of the presence of Navy personnel, aircraft, vehicles, vessels, etc. on Native Hawaiian culture, and on the community itself. Native Hawaiian culture and traditional practices are based on ancestral connections that comprise a sense of place and identity; a place can have sacred significance even if there are no structures or monuments there. Part of that sense of place is experiencing and observing the environment (Na Kilo ‘Aina) as their ancestors have for generations with the deep historical roots of Hawai’i Island’s west coast. Since the 1970s, Hawaiian culture has undergone a revival, with examples such as Hawaiian language revitalization, expeditions on traditional voyaging canoes, inter-tidal zone monitoring, experiential research during solstice & equinox events. Some of these events include Hawaiian language immersion expeditions, at sea and shoreline education, programs and camps, culture programs, and the documentation & assessment of cultural sites throughout the islands. In particular, our community is working on rebuilding and re-using the agricultural fields, reforest areas to protect the aquifer and are monitoring our ocean resources as we try to mitigate the problems caused by humans and ungulates over the past 100+ years.

The presence of Navy activities would likely be disruptive; actual operations (aircraft low passes, beach landings, vehicle movements, etc.) would certainly be disruptive. Many people who venture along the West coast of Hawai’i Island for research, educational,

recreational activities are also approaching their activities with a cultural mindset: conducting protocols that include chanting upon entering and leaving a place, or before and after doing something; observing not just what is right in front of them but what is all around them. We know that for outsiders who are not from here, Malama 'Aina (the watchers of our environment) can be difficult concept for the military to grasp. However; saying there is no impact on cultural resources or practices just because the Navy training "would not restrict the ability of individuals to use or access sites" is short-sighted and completely misses the bigger picture of Hawaiian culture and its relationship to the environment. We are all part of the environment and take our inner connection to the lands, waters, and skies of our homelands very seriously. These proposed trainings are in direct conflict of our beliefs and culturally practices on the land and in the ocean.

F. The DEA frequently ignores the impacts of global climate change in analyzing the impact of Navy operations on Hawaii's environment. While the region's northeast trade-winds used to keep the state's air relatively clean by carrying away locally generated contaminants, a 2012 University of Hawai'i study showed that the number of trade-wind days in the state has decreased almost 30% in the past four decades, resulting in a significant increase in hot, humid, low wind weather and a decrease in air quality. As long time residents of the Big Island, we can attest to the change in weather patterns that the Navy ignores. The "consistent trade winds" the Navy seems to be relying on to "efficiently carry away air contaminants" and "promote effective dispersal" are no longer consistent and should not be part of the Navy's 'plan' to deal with air pollution its exercise produce furthermore contaminants may disperse so it can't be seen by the naked eye but it doesn't just disappear, just dissipates. The accumulative impact from all sources does impact our way of life and these trainings will leave behind contaminates that will impact our are, ocean and lands, there is no denying that fact.

G. NEPA requires the Navy to justify why it needs to conduct a proposed action in a certain place, as opposed to a different place. The DEA's claim that the Navy cannot provide combat ready forces under 10 U.S.C. § 167 due to lack of 'training scenario variety' unless it conducts training on the Big Island's west coast is without merit. The U.S. government is the second largest land owner in the State of Hawai'i; the federal footprint covers over 500,000 acres or almost 13% of the State's land. Nothing in the DEA justifies why the Navy cannot conduct diverse and productive training at any one of the huge military bases in the State (JBPHH, Marine Corps Base Kaneohe, PMRF, Pohakula Training Center, Schofield Barracks, etc.), or for that matter, at any of the national parks in the state, instead of on a relatively undisturbed stretch of coastline rich in natural and cultural resources and treasured by the local community and tourists (the driver of the State's economy) alike.

H. Finally, and related to F. above, conducting training operations at remote locations along Hawai'i Island's west coast also conflicts with the "Training Area Screening Factors" outlined in Section 2.4 of the DEA. The proposed training areas do not have ready access to "multiple military medical facilities" or even a "broad availability of on-call medical facilities". Nor is there ready access to lodging, maintenance support, or the logistical needs to support the "unique training and operational requirements for naval

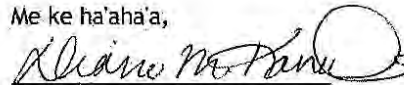
special operations personnel” where the “proximity of secured Navy facilities/installations is critical.”

In summary, the Navy’s DEA does not comply - in multiple ways - with NEPA requirements to examine the potential impacts of the proposed action. In addition, conducting Navy SpecOps training in an area of significant natural and cultural resources treasured by the community when there are other more appropriate locations is just deplorable. These cultural resources are sacred and revered by our local families who visit the ancient sites, carry our Hawaiian protocols and bring our youth to understand our history and culture through the hundreds of ancient sites that are spread across the West Hawaii coastline, including Kawaihae to North Kohala. Our people continue to practice the Hawaiian cultural activities that were carried out on these lands both physically and spiritually. This area is also hosts visitors from around the state and the continent of America, as well as attracting international visitors, important not only on a socio-cultural basis but also on a socio-economic basis.

We all live on the Kohala coastline, and like many others in the community and many tourists on the Big Island, we walk the trails of our ancestors and pay our respects to honor the multiple amazing, already documented as well as the many undocumented archeological and historic sites along the S. Kohala and North Kohala shoreline to the top of the mountains. It is proof that thousands of our ancestors lived and thrived in this area for thousands of years and the proposed Navy training area will have a negative impact on the natural beauty as well as the incredible diversity of natural and cultural resources. Navy training will disrupt these activities for everyone and will forever alter the unique land- and sea-scape of Hawai’i Island further destroying the historical and archeological sites along this very rugged and beautiful coastline and ocean.

We recommend that the Navy consider drafting an Environmental Impact Statement (EIS), as a properly drafted EA for the proposed actions which include interviewing Native Hawaiians to understand the proposed activities would have to the land, waters and natural environment which cannot possibly result in a Finding of No Significant Impact (FONSI). Failure to conduct the appropriate NEPA analysis and/or reduce the number of non-federal training locations will most certainly result in legal action against the Navy.

Me ke ha’aha’a,


Diane M. Kanealii, Executive Director
Kailapa Community Association


Wyman "Keala" Drummondo, President
Kailapa Community Association



DEPARTMENT OF THE NAVY

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NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
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5000-45E
N45
April 12, 2021

Jane Taylor (artteachers@mac.com)

Dear Jane Taylor:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The concern about military expansion is outside the scope of the project. However, for clarification and as discussed in the Final EA, Chapter 1, Section 1.1 (Introduction), naval special operations personnel have been training in certain areas of the State of Hawaii for decades. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Air quality is analyzed in Section 3.1 of the Draft and Final EAs and Air Quality Calculations are presented in Appendix B. Transportation vehicles, vessels, aircraft, and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on regional ambient air quality. In addition, the dispersive nature of the proposed activities would prevent pollutants from concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed National Ambient Air Quality Standards. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination. Therefore, no significant impacts on air quality would occur with implementation of Alternative 2 (Preferred Alternative).

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 15, 2018 comment letter from Jane Taylor.

Copy to: Hawaii Department of Land and Natural Resources

From: Jane Taylor <artteachers@mac.com>
Sent: Thursday, November 15, 2018 12:42 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] West Hawaii Training Options comment

To Whom it May Concern:

My name is Jane Taylor. I have lived in Kamuela Hawaii for most of my 68 years, moving here in 1954 when my father became the Headmaster at Hawaii Preparatory Academy, and staying to build my life and raise my family. I am now a teacher in Waimea.

My children and I have spent much time in and out of the Kawaihae area and up and down the coastline, both by boat and hiking. We have snorkeled the area as well and seen the decline of the coastal populations of fish and coral.

My comment is that the military should not expand its operations here in any way. I suggest that this is a unique and fragile place with whales, dolphins, and countless less noticeable creatures. Our fragile coral reefs are gradually healing after a terrible bleaching event. Since the causes of that have not been fixed (climate change) anything at all that stresses this area should be avoided.

I would also address the wording in the assessment: "effect but not adversely effect", a phrase which was used repeatedly. On the contrary, the existing impact of the military already adversely impacts the experience of any human in the area, and I am sure it is true of the wildlife as well. The noise and air quality in and around Kawaihae harbor are horrible whenever the military is conducting operations. I have personally canceled my plans a number of times because upon arrival I found it too smelly and loud to stay and conduct my planned activities. (paddling, painting, walking, etc.) Imagine if you if you lived or worked there? You would certainly say it was an adverse impact!

I recommend that for now the "no change" option be adopted. I also recommend that the military seek out already degraded areas for necessary training, rather than pristine, unique, and fragile ones. I would hope the military will reduce rather than increase its presence here, and stay with places already damaged.

I do not question the need for training, but I do believe there are already plenty of degraded places to do it. You could thus avoid continuing the tradition of taking what you need without thought to the impact on a no-longer limitless environment.

Thank you for the opportunity to comment. Please respond to my e-mail so that I know it was received and please let me know if a different format would be more appropriate.

Mahalo,

Jane Taylor

artteachers@mac.com <mailto:artteachers@mac.com> <http://janewordtaylor.blogspot.com/>

"Wisdom demands a new orientation of science and technology towards the organic, the gentle, the non-violent, the elegant and beautiful." E.F. Schumacher.

1



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April 12, 2021

Kawaipio Border (kborder@kkp.k12.hi.us)

Dear Kawaipio Border:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. In accordance with section 7 of the Endangered Species Act (ESA), the Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. The terminology used within the Draft and Final EAs to document the potential effects of the proposed training is consistent with the ESA (16 U.S. Code Section 1531 et seq.). Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. Based on the analysis in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs, environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Section 2.1 and Table 2-4 of the Draft and Final EAs). Overall, the non-invasive nature of the naval special operations training activities (e.g., no live-fire, no construction, no digging, no fires, no human waste) would have minimal effects on the environment because of the short duration, infrequency of occurrence, and low intensity of the proposed training activities. Because the goal of training is for the trainees to be in the field undetected, the environment would be minimally disturbed and materials (e.g., gear and trash) would not be left behind. As analyzed in Chapter 3 of the Draft and Final EAs, no significant impacts would occur with implementation of Alternative 2.

NSWC will also conduct training in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, *Navy Safety and Occupational Health Program Manual* (2011). See Chapter 2, Section 2.6 (Best Management Practices and Standard Operating Procedures). Training activities would be consistent with management objectives of individual sites, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 13, 2018 comment letter from Kawaipio Border.

Copy to: Hawaii Department of Land and Natural Resources

From: Kawaipio Border kborder@kkp.k12.hi.us
Sent: Tuesday, November 13, 2018 2:54 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Excercises

Aloha,

My name is Kawaipio Border, I am a native Hawaiian born an rasied here on the Big Island, that is against these activities that "may affect but not adversely affect" 5 of Hawaii's Endangered species. This is appalling!!! It will affect our land, native plants, and animals. Kahoolawe is a clear example of what the military has done to Hawaii!!! What has the military done to clean up all UXO? Is it fair to hire civilians to clean up after the military? When will the military find somewhere else to damage? Why cant military stay in their designated ares?



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April 12, 2021

Mary Jo Lake (maryjolake@gmail.com)

Dear Mary Jo Lake:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. In accordance with section 7 of the Endangered Species Act (ESA), the Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 16, 2018 comment letter from Mary Jo Lake.

Copy to: Hawaii Department of Land and Natural Resources

From: Mary Jo Lake maryjolake@gmail.com
Sent: Friday, November 16, 2018 9:11 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Hawaii Island Training

Aloha Project Manager,
Please consider continuing to train on or around Ohau, Kauai, and Kaoolawe. Those residents are already resigned to the this type of intrusive activity.

These training activities may not adversely affect our engendered species according to the EA study you had done..(Why am I not surprised?) but they certainly will adversely affect me.

I do not want you to do this here. Need I justify my concerns with a rant as to why I do not want you to train here? I am asking you not to do this.

Repectfully,

Mary Jo Lake

District 7 County of Hawaii

P.O.box584

Holualoa,Hi.96725

maryjolake@gmail.com



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April 12, 2021

Carolyn Witcover (carolyn54@gmail.com)

Dear Carolyn Witcover:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 13 and 17, 2018 comment letters from Carolyn Witcover.

Copy to: Hawaii Department of Land and Natural Resources

From: Carolyn Witcover carolyn54@gmail.com
Sent: Tuesday, November 13, 2018 11:04 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Training area

Despite the environmental assessment, I am concerned about the effect on tourists who might see such operations.

Carolyn Witcover

From: Carolyn Witcover <carolyn54@gmail.com>
Sent: Tuesday, November 13, 2018 11:10 AM
To: Rep. Richard Creagan <repreagan@capitol.hawaii.gov>
Subject: Navy training area

I'm not sure if you are the right person to contact but maybe you can forward this to that person.

I read about the proposed navy training area off parts of the Kona and Kohala coasts. I am concerned that our visitors may be unnerved by seeing such activities and i don't think we want that. I think it might put a damper on my day at the beach too.

Thank you,

Carolyn Witcover

83-5599D Middle Keel Rd, Captain Cook

From: Carolyn Witcover carolyn54@gmail.com
Sent: Saturday, November 17, 2018 11:50 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Hawaii training

Aloha

I live on the Big Island and i am an army brat. I support having a well trained and action ready military force. I have read parts of the proposal but it is difficult for a lay person to really understand. Basically, my concern is that a visitor's experience of the island will be tainted by seeing military exercises. It is a bit unnerving in this era to be reminded of risk especially while on vacation.

The proposal is thorough but I'm not sure it addresses the psychological impact on people and the economy.

Mahalo,

Carolyn Witcover
83-5599D Middle Keel Rd
Captain Cook, HI 96704



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April 12, 2021

cee s-s (miaamore1960@gmail.com)

Dear Cee S:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or structures at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction of infrastructure, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 13, 2018 comment letter from cee s-s miaamore1960@gmail.com.

Copy to: Hawaii Department of Land and Natural Resources

From: cee s-s miaamore1960@gmail.com
Sent: Tuesday, November 13, 2018 9:16 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Hawaii Military Excercises

Aloha! I just read the article by Hawaii Tribune Herald which is unbelievable in my view. Why can't you find a remote island elsewhere? There is still unexploded ordnance in the back yard of residents in Wiakaloa that need to be removed!
These military exercises would definitely impact not only the Hawaiian lifestyle we love here in the islands but also ALL wildlife!
PLEASE DON'T RUIN HAWAII ISLANDS WITH THESE MILITARY EXERCISES!!
Mahalo!



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April 12, 2021

Cyndy Dyal (okfine2@hawaii.rr.com)

Dear Cyndy Dyal:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The proposed Naval Special Warfare Command activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence during and after proposed training activities. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 13, 2018 comment letter from Cyndy Dyal.

Copy to: Hawaii Department of Land and Natural Resources

From: Cyndy Dyal okfine2@hawaii.rr.com
Sent: Tuesday, November 13, 2018 7:16 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] War Games off the Kona Coast

Dear Military,

Why in God's name are you doing your war games and sonar tests off the Kona coast during whale season?! Especially in the Maui/ Hawaii corridor. I realize that the United States has to be prepared for war, however you could do your tests and drills elsewhere or during another part of the year. Our marine mammals will most definitely suffer as in the past. Shame on you.

C. Dyal
PO Box 5622
Kailua-Kona, Hi 96745
808-937-9937



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April 12, 2021

Daniel Curnan (dcurnan@gmail.com)

Dear Daniel Curnan:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 (Training Area Screening Factors) are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 13, 2018 comment letter from Daniel Curnan.

Copy to: Hawaii Department of Land and Natural Resources

From: Daniel C <dcurnan@gmail.com>
Sent: Tuesday, November 13, 2018 1:03 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military excercises in Hawaii

As a resident of the island of Kauai. I believe you will face harsh criticism and defiance to your plans on using OUR 'Aina for military exercises. The people will be here to protect what we have left. That's already proven. LIKE the expansion of the "marine reserve", the monk seal debacle, not to mention the interisland SUPERFERRY.

However, in hindsight I may have a suggestion, with a different approach....

Aloha Kauai, this is the U.S. military. We are training our countrymen in counteracting acts of terrorism against our beloved nation. We are here to ask if we may train our best n brightest to rid the Kalalau valley of the louses that desecrate the environment. Blah blah blah... We'll call them "environmental terrorists". For two weeks, designated of course, you find these louses, charge them for their offenses, hand them over to county/state for prosecution. And move on. Win-win right?

Haha!! Yes I wish it were that easy. But all be it, at least there in lies a different approach. U get the jest!?!

Better idea?!? U could just play war in Arizona, or Wisconsin, or Kansas, even North Korea... just anywhere else but here.

My 2c...Mahalo,
Daniel Curnan



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Kay Kammerzell (kaykamm@gmail.com)

Dear Kay Kammerzell:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, proposed training on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local

police departments and law enforcement prior to conducting training activities. Overall, there should be no impact to current use of any areas proposed for training, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 17, 2018 comment letter from Kay Kammerzell.

Copy to: Hawaii Department of Land and Natural Resources

From: Kay Kammerzell <kaykamm@gmail.com>
Sent: Saturday, November 17, 2018 7:35 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Opposition to Navy activities - for the record

Attn: Project Manager:

I am writing to say I am outraged and greatly opposed to having the Navy conduct ANY of its activities anywhere along the Kohala Coast. These proposed activities are beyond absurd. The communities and residents of these areas WILL NOT allow this to take place. You have allowed only one month for public comment? If this were to get shoved through, there will be protesters by the thousands, I am sure of it. Having been a past resident there, I greatly value the entire coast for its natural and native Hawaiian importance. It is sad that much of the coast has been bought up and privatized or turned into resorts, and now much of the coastal lands and beaches are no longer accessible to the public. Much of the coast is bustling with visitors - and then there are those few areas left that locals go that are not bustling. They go there to be close to nature, listen to the waves, take a quiet swim, go snorkeling, paddling, or fish for their families. The remaining coastal areas are natural and pristine, they are no place for Navy activities or war game exercises. It goes without saying that the marine life in these areas would be negatively impacted by the Navy's proposed activities - from the delicate coral to the sea turtles. These activities bring noise pollution, water pollution, and air pollution and would disrupt the quality of life for the people and communities that live there. I know many native Hawaiians consider many of the areas to be important sacred areas. I am VERY much opposed to any trainings or activities by the Navy along the Kohala Coast. I request my letter to be part of the public record. I further request that you extend your public comment period and allow several months for people to respond.

Kay Kammerzell
(360) 317-4137 (c)



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Nawahine-Kaho'opi'i Ohana (savehawaiiidogs@gmail.com)

Dear Nawahine-Kaho'opi'i Ohana:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission.

A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees’ skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

5000-45E
N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director

Regional Environmental Department
By direction of the Commander

Enclosure: November 18, 2018 comment letter from Nawahine-Kaho'opi'i.

Copy to: Hawaii Department of Land and Natural Resources

From: nawahine kahoopii <savehawaiiidogs@gmail.com>
Sent: Sunday, November 18, 2018 1:57 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] No to expanding training onto public lands NO,
NO NO

NO!!!! to training that would occur in residential areas off nearshore waters and land-based areas on Oahu, Hawaii Island and Kauai, and in nearshore waters, including harbors and bays, of Maui, Molokai and Lanai. On Hawaii Island, training will be conducted along part of the South Kohala and North Kohala coasts, approximately from Mahukona in North Kohala to just south of Kawaihae in South Kohala. Training also is planned in North Kona from Kukio Bay to about Waiaha Bay, south of Kailua Bay.

For God sake, you have hundreds of thousands of acres of land already. I am worried for the environment our wildlife, sea life, and the cultural sites as well as the impacts on the quality of life for our communities. I urge the military to clean up all the depleted uranium and unexploded ordinances on the big island, Kahoolawe and Makua before expanding any operations anywhere. These are residential areas and as the whale season begins this is the last thing we need.

What about the impacts on the economy? Do you really think tourist want to see war games playing out while they enjoy the beaches and ocean activities? For God sake this is insanity.

No, No, NO!!!!

Nawahine-Kaho'opi'i Ohana Po Box 2714
Kamuela, HI 96743



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Richard Liebmann (richardliebmann@gmail.com)

Dear Richard Liebmann:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate requirements prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

In addition, NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

5000-45E
N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director

Regional Environmental Department
By direction of the Commander

Enclosure: November 17, 2018 comment letter from Richard Liebmann.

Copy to: Hawaii Department of Land and Natural Resources

From: Richard Liebmann <richardliebmann@gmail.com>
Sent: Saturday, November 17, 2018 2:41 PM
To: NFPAC-Receive
Subject: [Non-DoD Source]

Dear Military,

As a long time resident of North Kohala, I strongly object to any and all military exercises along the pristine coastline of North Kohala.

In no uncertain terms the North Kohala coastline has been recognised as unique and precious and therefore worthy of the highest levels of protection by its citizens and government.

Additionally, any and all military exercises in North Kohala will have a negative impact on the quality of life of the residents of this peaceful rural community.

Thanks so much considering my comments.

Aloha,

Richard Liebmann



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Beverly Blake (beverlyblake@ymail.com)

Dear Beverly and Donald Blake:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected

and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 19, 2018 comment letter from Beverly and Donald Blake.

Copy to: Hawaii Department of Land and Natural Resources

From: Beverly Blake <beverlyblake@ymail.com>
Sent: Monday, November 19, 2018 1:28 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military exercises

My husband Donald and I wish to object strongly to the military exercises being proposed for North Kohala. This is a sacred and special area with many endangered and protected species and an area that is heavily used by Hawaii kamaina and tourists. Not appropriate for this area. There are many uninhabited islands to our north. Why can't they be used instead?

Beverly and Donald Blake, Hawi, HI



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 6, 2021

Sharron Stanbro
PO Box 118
Holualoa, HI 96725

Dear Sharron Stanbro:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission.

As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. Naval Special Warfare Command would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers and receipt of rights of entry or other real estate agreements.

A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

5000-45E
N45
April 6, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R
.1229438936

Digitally signed by
ENG.SHERRI.R.1229438936
Date: 2021.04.06 15:09:35
-10'00'

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 14, 2018 comment letter from Sharron Stanbro.

Copy to: Hawaii Department of Land and Natural Resources

to women's concerns.

11-14-18

I am writing to let you know this is not just a jump on the computer and rush out an email issue.

When I drive past Pohakaloa I see the increases in military use and know the island is in for military expansion. Financially you are very powerful but the use of the Oceans and coastline is a no go.

I grew up a stones throw from Camp Pendleton and watched the tearing up of the coastal lands.

The coast of Hawaii is delicate. Turtles feed all along the coast, whales breed in all the areas you are targeting.

We work on protecting our reefs with science and laws.

Keep your military on spots you have already messed up. There is no reason to ruin a virgin spot after what you did at Kaaolawe.

My father almost lost his life at Iwojima - he was never the same. The military has its place - not on our Ocean & Coast.

Sincerely,
Sharon Stubbins
808.9600645 Box 118
Hualaloa 96725

ENCLOSURE



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Jean Willey (alekawilley79@gmail.com)

Dear Jean Willey:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no

impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas. Although proposed training activities on the Island of Hawaii include over-the-beach training, the Proposed Action does not include the use of Drop Zones as no air-based training activities are proposed for the Island of Hawaii (refer to Tables 2-3 and 2-4 of the Draft and Final EAs).

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

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April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from Jean Willey.

Copy to: Hawaii Department of Land and Natural Resources

From: Aleka Willey <alekawilley79@gmail.com>
Sent: Sunday, November 25, 2018 5:37 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Kohala Coastline

I've recently read a news article detailing plans to use the Kohala coastline for military exercises. I grew up in North Kohala and the beauty, cultural heritage and pristine coastlines are unique and unlike anywhere else. Fish is plentiful because of the reefs and clean water, it's also very untouched by commercial fishing boats or very many motorized watercraft. This area needs to be preserved and the impact of the proposed exercises would cause more harm than good. I understand the need to practice exercises used to protect the United States, but you also need to recognize the negative impact you will have on this area, and community. The noise alone from choppers and vehicles, the road and traffic issues for commuters, this will all impact everyone and not in a good way. Please consider not holding your exercises in this area.

Thank you,
Jean Willey



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JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Alethea Lai (alethea@hula.net)

Dear Alethea Lai:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

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April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from Alethea Lai.

Copy to: Hawaii Department of Land and Natural Resources

From: Alethea Lai <alethea@hula.net>
Sent: Sunday, November 25, 2018 1:02 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] I am in opposition

To Whom It May Concern:

I am completely opposed to you using the Big Island's pristine coastline along the Kohala Coast for military training. This is the largest undeveloped track of land in the Hawaiian Islands, with literally hundreds of undisturbed Hawaiian archeological sites. Find somewhere else to go.

Thank you,
Alethea Lai



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NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Cassandra Clark (cassclark1948@gmail.com)

Dear Cassandra Clark:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no

impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Cassandra Clark.

Copy to: Hawaii Department of Land and Natural Resources

From: Cassandra Clark <cassclark1948@gmail.com>
Sent: Monday, November 26, 2018 10:01 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Defiling the coast of the Big Island of Hawai'i

I live on the coast of the Big Island. I just left Oahu where "military events" are ongoing ... and was happy to leave it. What kind of warfare are you practising here? Warfare against the Hawai'ian people. Blasting noise, heavy traffic, paranoia. Who are you planning to attack by "practicing" here. Go away!!! This is just another case of old white men playing with their toys.

Indignantly,
Sandra E Clark
161 Banyan Drive #508
Hilo, HI 96720



DEPARTMENT OF THE NAVY

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NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Ede Fukumoto (eafukumoto@hotmail.com)

Dear Ede Fukumoto:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 (Training Area Screening Factors) are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Ede Fukumoto.

Copy to: Hawaii Department of Land and Natural Resources

From: Ede Fukumoto <eafukumoto@hotmail.com>
Sent: Monday, November 26, 2018 8:04 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Plans for Kohala Coastline in 2019

Sir/Madam: I am against any further “use” of our island lands, coastal or mountain that any military agency chooses to use for their war time practices. Our islands have been challenged and used by the military for its strategic uses purportedly to protect the US. Why can’t you use the mainland desserts and other unused areas instead of our Hawaii islands? This makes more sense than the constant destruction of our beautiful islands. Please rethink your planning and consideration of further destruction of our islands. Thank you.



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April 12, 2021

Gary Ackerman (garyack4art@gmail.com)

Dear Gary Ackerman:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected

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April 12, 2021

and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 22, 2018 comment letter from Gary Ackerman.

Copy to: Hawaii Department of Land and Natural Resources

From: Gary Ackerman garyack4art@gmail.com
Sent: Thursday, November 22, 2018 12:28 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] military unwanted notice

My family has a forty year commitment to family and business in Kohala. Tourism is just about the only revenue that keeps our community humming.

To bring military activity into our area and along the coast will bring unwanted activity that is harmful to all of us.

Please find other unpopulated areas to do noise pollution and dangerous maneuvers that jeopardize our way of life.

The Ackerman Ohana



DEPARTMENT OF THE NAVY

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850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Ginger Buckley (gingersu@icloud.com)

Dear Ginger and Kevin Buckley:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any

training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 21, 2018 comment letter from Ginger and Kevin Buckley.

Copy to: Hawaii Department of Land and Natural Resources

From: Ginger Buckley <gingersu@icloud.com>
Sent: Wednesday, November 21, 2018 3:50 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military exercises, Kohala coast

We firmly object to any use by the military on land or sea along the Kohala coast line of the big island . These areas are sensitive and beautiful unspoiled waters , and land. These areas are considered the play ground for tourists and residents alike , which should be ensured as preservation grounds for swimming, boating, diving , and fishing .

Also the whale migration and dolphins have been visiting these areas and this should be a sanctuary for them too. Whales are birthed here, and many conservation groups observe these areas for population counts every winter . Please find an area that would not be so invasive to our way of life.

Sincerely,

Ginger Buckley

Kevin Buckley

Residents of

Kapa'au, north Kohala.

Sent from my iPhone



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Helen Swinney (belladonna4444@yahoo.com)

Dear Helen Swinney:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any

training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from Helen Swinney.

Copy to: Hawaii Department of Land and Natural Resources

From: Helen Swinney <belladonna4444@yahoo.com>
Sent: Sunday, November 25, 2018 12:41 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Proposed new expansion of military operations along the Kohala coastline, Big Island of Hawaii

Naval Facilities Engineering Command Pacific.
Attention - Project Manager

I am writing this letter in response to the Proposed new expansion of military operations along our Kohala coast line of the Big Island of Hawaii.

I and many other families live near , value and enjoy this unique area. This is our “Playground” to be enjoyed and appreciated not just now but for future generations as well.

Not only is it home now to a fragile ecosystem including a variety coral, fish, pods of Dolphins, this area is a designated whale sanctuary, which is a huge enjoyment for many.

We are at a delicate time within the history of the Hawaiian Islands that if we do not step up and let our concerns be heard it may be too late to change course. Must we challenge Nature again with these military exercises ?

Do we continue until the last whale is gone ?

The Kohala coast is unique, we already see how our coast is suffering the consequences of climate change. It needs time to recover and heal instead of further insult be Military exercises.

The Military historically has left a trail of degradation upon these Island already. Rather than exploit the unique Kohala coast, perhaps returning to a location already degraded would be in everyones best interest.

I read the Environmental Impact Statement which in my opinion makes light of a very devastating proposal. We, living in the Kohala coast area already feel and hear the military bombings and aircraft flying over our homes.

Yes we get it the you need a location for your military practice ; Please lets leave the Kohala coastline protected and valued as the precious place that it is.

Your Truly

Helen Swinney
Kohala Ranch resident .

Thank you for taking the time in reading my letter



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Jan Wizinowich (janwiz@gmail.com)

Dear Jan Wizinowich:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their

presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Jan Wizinowich.

Copy to: Hawaii Department of Land and Natural Resources

From: Jan Wizinowich <janwiz@gmail.com>
Sent: Monday, November 26, 2018 1:02 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] proposed trainings on Kohala Coast

The Kohala coast, specifically from Kawaihae to Mahukona, is treasured by local residents, and visitors alike. It is also a sanctuary for many species of sea and bird life, including humpback whales, which come during the proposed time for trainings and pods of dolphins that regularly cruise the coast for feeding grounds.

Having military training going on will seriously, negatively impact our way of life, which includes outrigger canoe paddling, fishing, surfing and other water sports. Please do not ravage our home waters and coastline. Mahalo, Jan Wizinowich / Kamuela, HI



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
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JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Jeanne Teleia (jeanneteleia8@gmail.com)

Dear Jeanne Teleia:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 201 comment letter from Jeanne Teleia.

Copy to: Hawaii Department of Land and Natural Resources

From: Jeanne Teleia <jeanneteleia8@gmail.com>
Sent: Sunday, November 25, 2018 5:27 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] no more military exercises on Kohala coast

I am writing to protest any additional military operations or exercises on the Kohala coast (or anywhere else on Big Island). Our island is already disrupted, bombed, polluted, restricted and otherwise negatively affected by military operations. I am especially worried about the impact of the excessive noise on marine life that is already disrupted and harmed by RIMPAC and other military sonar exercises.

Enough is enough! Already too much area is not accessible to locals and now the military wants to cut off more of it for their exercises. No more! It already feels like a war zone here with the actions at Pohakuloa. No more!

Malama Pono and in Nai'a spirit,

Jeannie



DEPARTMENT OF THE NAVY

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JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Julie-Mae Stitz (jewelzhawaii@gmail.com)

Dear Julie-Mae Stitz:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any

training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from Julie-Mae Stitz.

Copy to: Hawaii Department of Land and Natural Resources

From: julie mae <jewelzhawaii@gmail.com>
Sent: Sunday, November 25, 2018 8:08 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Attention: Project Manager

I am extremely concerned about the military proposal for Kohala. For one this is absolutely disrespectful to Hawaiian culture and their land. Secondly, it is putting all the protected and nonprotected species at serious risk. For the people who live close by there is going to be a lot of noise pollution and feelings of unease. I am already so upset with the navy is doing regarding sonar in the ocean. The sonar alone is killing off our whales, they are protected and its not okay to not consider them. Added noise whatever else is going to disturb their home even more. I do not feel comfortable with this proposal for Kohala and I strongly oppose it.

--

Julie-Mae Stitz

Owner, Designer, Artist

Jewelz & Gifts of Hawai'i

jewelzhawaii@gmail.com <mailto:jewelzhawaii@gmail.com>

(808)313-2783

Until one has loved an animal, a part of one's soul remains unawakened.— Anatole France



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
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JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Lorraine Warner (lwarners556@gmail.com)

Dear Lorraine Warner:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 22, 2018 comment letter from Lorraine Warner.

Copy to: Hawaii Department of Land and Natural Resources

From: lorraine warner <lwarner556@gmail.com>
Sent: Thursday, November 22, 2018 12:09 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Adamant No to Military Proposal for Kohala Coastline Military Maneuvers

I am writing for myself, as well as most of the citizens along the Kohala Coastline who are vehemently opposed to such military maneuvers being proposed. We demand that none of this be carried out here. It has HUGE effects on the environment of all types, contrary to what is being set forth.

It will produce noise pollution; air pollution; disturbance and destruction of the wildlife; disturbance and destruction of the sea life just as a start. This is a fairly pristine area, and needs to be kept that way.

We are demanding and insisting that all consideration of these local military maneuvers be stopped and not allowed. We also demand a public forum for discussion of this.



DEPARTMENT OF THE NAVY

COMMANDER
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5000-45E
N45
April 12, 2021

Ma'ata Tukuafu (maata.tukuafu808@gmail.com)

Dear Ma'ata Tukuafu:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with

5000-45E
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April 12, 2021

the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Ma'ata Tukuafu.

Copy to: Hawaii Department of Land and Natural Resources

From: Ma'ata Tukuafu <maata.tukuafu808@gmail.com>
Sent: Monday, November 26, 2018 1:22 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] NO MORE military expansion

To whom it my concern (from all who are concerned...),

This letter is in response to the proposed new expansion of military operations along our Kohala coast line of the Big Island of Hawaii.

Please stop! We don't need more training that upsets the balance for people, land, sea life and birds. We feel it in our stomachs every time bombs go off at Pohakuloa, and we live in Kawaihae!

Our ecosystem is already fragile. I don't like the fact that the mainland of USA where there are hundreds of acres of land with no surrounding people is not used. Yet the military deems it appropriate to play war games on our tiny island in the middle of the pacific.

The Kohala coast is unique, we already see how our coast is suffering the consequences of climate change. It needs time to recover and heal instead of further insult by Military exercises. The Military historically has left a trail of degradation upon these Island already. Rather than exploit the unique Kohala coast, perhaps returning to a location already degraded would be in everyones best interest.

Thank you and please add my vote to the many who are voicing to NO MORE expansion by the military.

Ma'ata Tukuafu, writer
maata.tukuafu808@gmail.com
808-895-7896



DEPARTMENT OF THE NAVY

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April 12, 2021

Megan Macarthur (megan@macarthurhawaii.com)

Dear Megan Macarthur:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

Please note that NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. Based on the analysis in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs, environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Section 2.1 and Table 2-4 of the Draft and Final EAs). Overall, the non-invasive nature of the naval special operations training activities (e.g., no live-fire, no construction, no digging, no fires, no human waste) would have minimal effects on the environment because of the short duration, infrequency of occurrence, and low intensity of the proposed training activities. Because the

goal of training is for the trainees to be in the field undetected, the environment would be minimally disturbed and materials (e.g., gear and trash) would not be left behind. As analyzed in Chapter 3 of the Draft and Final EAs, no significant impacts would occur with implementation of Alternative 2.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from Megan Macarthur.

Copy to: Hawaii Department of Land and Natural Resources

From: Megan Macarthur <megan@macarthurhawaii.com>
Sent: Sunday, November 25, 2018 2:38 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Opposed to Kohala Coastline for Military Exercises

To whom it may concern:

This is one of the most beautiful and few untouched coastlines on our island which has not been over built with homes or hotels. We have peace and no Ospreys or huge jets upsetting nature.

I completely oppose this proposal. Hawai'i is so small. Look for somewhere with lots of land and coastline such as the Pacific Northwest or California. Please leave this island and state, that has already been through far too much trauma in the last year with fire, floods, active volcanoes and ballistic middle scares, alone to be closer to its natural state which is why people come to the island.

Thank you,

Megan

Megan MacArthur, RB, VP
MacArthur Sotheby's International Realty Kamuela, Hawaii 96743
Office (808) 885-8885
Direct (808) 895-5748

Megan@macarthurhawaii.com Bigislandreale.com



DEPARTMENT OF THE NAVY

COMMANDER
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850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Rick Davis (ourdoc1@gmail.com)

Dear Rick Davis:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas. Although proposed training activities on the Island of Hawaii include over-the-beach training, the Proposed Action does not include air-based training activities for the Island of Hawaii (refer to Tables 2-3 and 2-4 of the Draft and Final EAs).

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from Rick Davis.

Copy to: Hawaii Department of Land and Natural Resources

From: Rick Davis ourdoc1@gmail.com
Sent: Sunday, November 25, 2018 10:45 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Kohala use.

I am worried for the environment our wildlife, sea life, and the cultural sites as well as the impacts on the quiet enjoyment of our communities. These operations could include dropping 40 people from planes or helicopters and 15 people on land. The use of boats and subs and or unmanned and 4 other aircraft. These operations will drastically change our quiet island.



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April 12, 2021

Sharon Hayden (kprsharon@icloud.com)

Dear Sharon Hayden:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas. Although proposed training activities on the Island of Hawaii include over-the-beach training, the Proposed Action does not include air-based training activities for the Island of Hawaii (refer to Tables 2-3 and 2-4 of the Draft and Final EAs).

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts,

sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 23, 2018 comment letter from Sharon Hayden.

Copy to: Hawaii Department of Land and Natural Resources

From: Sharon Hayden <kprsharon@icloud.com>
Sent: Friday, November 23, 2018 3:42 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] North Kohala

Aloha- the coastline from Kawaihae to Mahukona is Home to many humans, whales, dolphins and historic sites. You may see an open road but 1000's travel this road daily. It is so not an appropriate place to do military excercies. Please remove the Kohala coastline from your consideration! Mahalo Sharon Hayden

Sent from my iPhone



DEPARTMENT OF THE NAVY

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N45
April 12, 2021

R. Crouch (tcrouch@punahou.edu)

Dear R. Crouch:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees’ skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas. Although proposed training activities on the Island of Hawaii include over-the-beach training, the Proposed Action does not include air-based training activities for the Island of Hawaii (refer to Tables 2-3 and 2-4 of the Draft and Final EAs).

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April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 25, 2018 comment letter from R. Crouch.

Copy to: Hawaii Department of Land and Natural Resources

From: Tai Crouch <tcrouch@punahou.edu>
Sent: Sunday, November 25, 2018 2:39 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Use of Kohala for training

Aloha,

Please use the lands you have already acquired, i.e. Bellows, Pohakuloa, Kahuku, Schofield or any of the dozens of military installations..

I camp at C. Mokulei'a and the heli. noise at night really puts a crimp on our activities at night with them doing touch and go at Dillingham Airfield.

Mahalo,
R.Crouch



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April 12, 2021

Ava Williams (avasgone2hawaii@me.com)

Dear Ava Williams:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas. Although proposed training activities on the Island of Hawaii include over-the-beach training, the Proposed Action does not include air-based, including MV-22 Osprey, training activities for the Island of Hawaii (refer to Tables 2-3 and 2-4 of the Draft and Final EAs).

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Ava Williams.

Copy to: Hawaii Department of Land and Natural Resources

From: Ava Williams <avasgone2hawaii@me.com>
Sent: Tuesday, November 27, 2018 11:59 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Proposed Special Operations Training in West Hawaii

I am writing to voice my strong opposition to the Navy's proposed Special Operations Training in West Hawaii. The areas you propose to use are some of the last remaining places of sanctuary for plants, animals, and marine life. There are numerous spiritual and cultural places of importance for Hawaiians in these coastal areas. Making room for an Osprey helicopter to land will adversely impact the plants and animals in the affected areas, by definition. They are loud and disruptive. Our tourists have no desire to hear an Osprey buzzing overhead while they are diving off the north Kohala Coast. I do not want to be out on my one man canoe when one of these passes nearby, or when there are submarine activities going on below me.

Please, leave these places alone.

Respectfully,
Ava Williams



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Cheri Johnston (cherijohnston15@gmail.com)

Dear Cheri Johnston:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 28, 2018 comment letter from Cheri Johnston.

Copy to: Hawaii Department of Land and Natural Resources

From: Cheri Johnston <cherijohnston15@gmail.com>
Sent: Wednesday, November 28, 2018 11:22 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Proposed U.S. Military Exercises

I am sending this email to state my opposition to the potential of military exercises on the Kohala Coast on the Big Island of Hawaii. In my opinion, it is currently one of the most pristine and ecologically healthy coastlines in all of the U.S. The type of exercises proposed would permanently alter or end the current migratory and birthing areas of the humpback whales along that specific stretch of the coastline.

I believe in the necessity of a strong military and I know these types of exercises are critical to our safety. May I suggest you consider an area where this type of activity would be less of an impact? If the Hawaiian islands are your area of focus, I suggest the Island of Oahu since it already has a strong military presence and the detrimental impact would be less.

Thank you for your consideration.

Cheri Johnston



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April 12, 2021

Cynthia Cornell (cfcornell@netscape.net)

Dear Cynthia Cornell:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas. Although proposed training activities on the Island of Hawaii include over-the-beach training, the Proposed Action does not include air-based training activities for the Island of Hawaii (refer to Tables 2-3 and 2-4 of the Draft and Final EAs).

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 28, 2018 comment letter from Cynthis Cornell.

Copy to: Hawaii Department of Land and Natural Resources

From: Cynthia Cornell <cfcornell@netscape.net>
Sent: Wednesday, November 28, 2018 4:37 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Oppose Kohala Coast Military Exercises

Attention Project Manager,

I just received notice that the military is considering using the Kohala Coast for military exercises in 2019. I own a townhome on the South Kohala Coast and strongly oppose these kinds of exercises along the Kohala Coast. These exercises will greatly affect the coastline, marine animals, tourist industry, and peace and quiet of this beautiful area and

the people who live there.

Thank you,
Cynthia Cornell



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Daniel Hodel (daniel.hodel@earthlink.net)

Dear Daniel Hodel:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road

driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Daniel Hodel.

Copy to: Hawaii Department of Land and Natural Resources

From: Daniel Hodel <daniel.hodel@earthlink.net>
Sent: Tuesday, November 27, 2018 12:11 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military Exercises on the Kohala shoreline: a terrible idea

The whole idea of conducting military exercises on the Kohala shoreline is an absolutely terrible proposal. Our pristine coastline, its coastal environment and the whole basis of our economy is not a playground for the military. You have huge resources set aside for this purpose. Use them. Stay off of other public lands! What a shameful misuse of our tax dollars! If you want to erode public support for the military, you have hit upon a brilliant strategy. If not, think again.



DEPARTMENT OF THE NAVY

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5000-45E
N45
April 12, 2021

Darby Partner (birthbliss@gmail.com)

Dear Darby Partner:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacting the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each proposed training area was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the Proposed Action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Darby Partner.

Copy to: Hawaii Department of Land and Natural Resources

From: Darby <birthbliss@gmail.com>
Sent: Tuesday, November 27, 2018 8:21 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] No to Navy Activity on the West side of the Big Island!

Please DO NOT increase navy and war activities/practices on the Big Island. The West side of the big island is home to endangered and precious marine life such as humpback whales, Monk seals & dolphins. The activity will hurt them.
NO WAR GAMES ON HAWAII!!!!

~Darby L. Partner



DEPARTMENT OF THE NAVY

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850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Jane Johnson (janeellenjohnson62@gmail.com)

Dear Jane Johnson:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Jane Johnson.

Copy to: Hawaii Department of Land and Natural Resources

From: Jane Johnson <janeellenjohnson62@gmail.com>
Sent: Tuesday, November 27, 2018 1:07 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] NO Military events on the Hawaiian Islands or Coastlines

I am begging you to not do what you are proposing.

We need less military not more.

The whales will be adversely affected.

They already are facing trials due to climate change this would be another trial that they do not need to face.

When the ,military is willing to be 100 % transparency about what these events entail, in public conversations, I vote NO.

NO

NO.

Not on my watch.

NO.

Thank you.



DEPARTMENT OF THE NAVY

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JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Julie Schwerdt (jaschwerdt@gmail.com)

Dear Julie Schwerdt:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.).

NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study areas.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 28, 2018 comment letter from Julia Schwerdt.

Copy to: Hawaii Department of Land and Natural Resources

From: Julia Schwerdt <jaschwerdt@gmail.com>
Sent: Wednesday, November 28, 2018 4:44 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military maneuvers on Kohala Coastline.

I am opposed to the coastline being used for military maneuvers. This is a major area for tourism and enjoyment of the natural resources. Please reconsider creating such a major disruption to a beautiful part of the Big Island!

Julia Schwerdt
Kaniku Dr
Kamela, HI



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPHH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Kc Kihara (kckihara808@gmail.com)

Dear Kc Kihara:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. For example, ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. Naval Special Warfare Command (NSWC) would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Kc Kihara.

Copy to: Hawaii Department of Land and Natural Resources

From: Kc Kihara <kckihara808@gmail.com>
Sent: Monday, November 26, 2018 6:10 PM
To: NFPAC-Receive
Subject: [Non-DoD Source]

This is a NO!!! Take this somewhere else... We don't need this affecting our traffic or our way of life... Mahalo
Kc



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Ken Kurtzig (ken@ireuse.com)

Dear Ken Kurtzig:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The proposed training activities do not involve changes to drainage patterns or introducing pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the

ground, or in air, in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 28, 2018 comment letter from Ken Kurtzig.

Copy to: Hawaii Department of Land and Natural Resources

From: ken@ireuse.com
Sent: Wednesday, November 28, 2018 9:34 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Please do not perform military exercises off the Kona Coast

The pristine Kona coast is not only a peaceful sanctuary for all inhabitants to enjoy our land and water but also obviously a habitat for millions of marine life. The whales, dolphins, fish, and other species thrive because this land and water has been protect and treated respectfully and we need to continue our Hawaiian tradition of respecting our land and water and conserve all these natural resources for our families and all the other species we share these islands with. Military exercises will produce horrible pollution in the water and land and noise and would destroy the reason so many people live and love Hawaii and visit Hawaii.

Aloha,
Ken

Ken Kurtzig
Founder, iReuse
ken@ireuse.com



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Laird Malamed (lairdo@cltc.com)

Dear Laird Malamed:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

In addition, NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Proposed training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the proposed training study areas.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Laird Malamed.

Copy to: Hawaii Department of Land and Natural Resources

From: Laird M. Malamed <lairdo@cltc.com>
Sent: Tuesday, November 27, 2018 5:32 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Concern about Proposed Military exercises on the Big Island of Hawaii

To whom it may concern,

I understand that military exercises are being considered and planned for the Big Island of Hawaii in the near future. As a homeowner in the Kohala Coast area, I am writing to express concern and ask that an alternative and more suitable remote site be utilized.

Without question, I support our Navy and realize and understand that exercises are a crucial part of preparedness and development. From my readings of history, this necessity has been demonstrated many times. Our Navy is the best in existence, and I support that it absolutely must remain so in this dangerous world.

However, the part of the island being considered is particularly sensitive due to the unique nature of the ocean environment. These kinds of military exercise have the potential for confusing and damaging the unique ocean mammals that migrate and live in this area including dolphins, whales and seals, as well as other ocean wildlife that struggle to survive. As someone who has the privilege to SCUBA dive amongst these ecosystems, I know from first hand experience how fragile the environment is.

Further, the local economy is sustained by a large amount of tourism that provides the state and county of Hawaii with crucial revenue. The noise and disruption that this will cause risks not only the environment but also the impression that tourists will have about the island. Military exercises may discourage tourists from returning to visit the Big Island in the future, undermining the state's economy. I remember when Waterworld was filmed in the same area how disruptive the noise was. Imagine a family traveling to Hawaii for the first time and being discouraged by the interruptions on what should be a magical holiday. They are not going to tell their friends to visit nor to return themselves!

I respectfully request that these exercises be moved to a much more remote and less environmentally sensitive area that would be much more suitable for these kinds of exercises. We have already sustained the impacts of Kīlauea this year!

I wish the Naval teams much success in their training, and I would like to thank each and every member for their service.

Thank you for reviewing my concerns and hopefully adjusting the plans to achieve the objectives in a different part of the Pacific.

Respectfully,
Laird Malamed



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Linda O'Brien (lobrien1192@gmail.com)

Dear Linda O'Brien:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

In addition, NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Proposed training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the proposed training study areas.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

5000-45E
N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Linda O’Brien.

Copy to: Hawaii Department of Land and Natural Resources

From: Linda O'Brien <lobrien1192@gmail.com>
Sent: Monday, November 26, 2018 7:53 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military exercises along Kohala Coast line!! STOP

To whom it may concern,

I am very concerned about the military exercises planned along the coast from Kawaihae to Mahu Kona. Your exercises will disrupt fishing, diving, canoe practice, and it will injure sea life along the coast of north Kohala. We have sacred places in the area, Heiau, ancient village sites, and other cultural places where we do not want the military disrupting, ruining, and disrespecting the places and practices and animals that we as Hawaiians hold dear. I am writing to say that the use of military activities along the coastline is a terrible idea! You snuck in over a holiday weekend last year and you think you can do this again and get away with it! Federal land once was crownlands, and it does not belong to you the United States military! You stole it from Hawaii when you Annexed it to the USA. You show us big islanders no respect! I hope you will reconsider your idea and plan to hold these exercises along the coastline of South Kohala and North Kohala!!!!

I hope you will change your plans.

Sincerely

Linda Piltz O'Brien

[Lobrien1192@gmail.com](mailto:lobrien1192@gmail.com)



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Lon Wallace (lon_wallace@hotmail.com)

Dear Lon Wallace:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

In addition, NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Proposed training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the proposed training study areas.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Lon Wallace.

Copy to: Hawaii Department of Land and Natural Resources

From: Lon Wallace <lon_wallace@hotmail.com>
Sent: Tuesday, November 27, 2018 11:52 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Expansion of Naval Operations on Kohala Coast, Big Island, Hawaii

I am writing to express my strong disapproval of the proposed expansion of operations and training on the Kohala Coast of Hawaii. I wonder what is considered "significant impact" when stating there will be no such thing. I have lived along this coast for close to 20 years, and can tell you that having such activities such as proposed will DEFINITELY have significant impact regarding our relative peace and beauty that we enjoy and live here for. I and friends frequently dive, kayak and hike all along this coastline, and it is absurd to state that we would not be radically impacted by this, as well as the essentially desert ecosystem here.

There is already approved areas for such training and activities; I respectfully ask that you please just keep these trainings limited to those.

Sincerely,

Lon A. Wallace, PhD.
(808)882-7029



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Mary Spears (maryannspears@earthlink.net)

Dear Mary Spears:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

In addition, NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Mary Spears.

Copy to: Hawaii Department of Land and Natural Resource

From: Mary Spears <maryannspears@earthlink.net>
Sent: Tuesday, November 27, 2018 2:13 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Proposed Military Exercises/ Special Warfare Command Joint Exercises on Hawaii Island

ATTN: Project Manager, Naval Facilities Engineering Command Pacific

I am vehemently opposed to the proposed Special Warfare Command Joint Exercises on Hawaii Island. The areas that you have proposed are important economically, fragile environmentally, and highly used recreation areas.

As a swimmer, paddler and homeowner in Kohala, the intrusion level of having Osprey aircraft, submarines, emergency personnel, Marines, etc. interacting with swimmers, paddlers, wildlife, and tourists, multiple times per month not only seems crazy and irresponsible, it is.

The Federal Government already owns over 500,000 acres in the State of Hawaii with over 400,000 of that on the Island of Hawaii. Why are you not using those places for military exercises? Volcano National Park has a large swath of shoreline that is largely unused. Why are you not using that for military exercises?

Why would you use the ocean along some of the most expensive real estate in Hawaii, that houses over a million tourists a year, with some of the most pristine shoreline in Hawaii.

Please reconsider your plan and take into account the rest of us who live in Hawaii.

Thank you for your consideration.

Mary Spears

Mary Spears

PO Box 847

Kamuela, HI 96743

(808) 987-0357

www.maryspears.com

maryannspears@earthlink.net





DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Pat Obrien (patobrien54@gmail.com)

Dear Pat Obrien:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Pat Obrien.

Copy to: Hawaii Department of Land and Natural Resources

From: Pato <patobrien54@gmail.com>
Sent: Monday, November 26, 2018 8:10 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] No to Military exercises in the Kohala Coast!!!

It disrupts and kills sea life!!!!
Sent from my iPhone



DEPARTMENT OF THE NAVY

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850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Rebecca Malamed (dr@drrebecca.com)

Dear Rebecca Malamed:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

In addition, NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

Proposed training activities would not interfere with public use of water areas for aquatic recreation or fishing. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the proposed training study areas.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 27, 2018 comment letter from Rebecca Malamed.

Copy to: Hawaii Department of Land and Natural Resources

From: Dr Rebecca Malamed <dr@drrebecca.com>
Sent: Tuesday, November 27, 2018 8:40 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Proposed Military exercises on the Big Island of Hawaii

To whom it may concern,

I am very concerned about the proposed military exercises that are planned for the Big Island of Hawaii.

First, let me emphasize that I am very supportive of the armed services and understand the need for our troops to be prepared. Military exercises are obviously essential to our national security however I do not believe that the exercises should be carried out in the Northwest region of the Big Island of Hawaii.

This part of the island is particularly sensitive due to the unique nature of the ocean environment. This kind of military exercise has the potential for confusing and damaging the unique ocean mammals that migrate and live in this area including whales and seals, as well as other ocean wildlife that struggle to survive.

Furthermore, this is an area with a large amount of tourism that provides the state of Hawaii with revenue. The noise and disruption that this will cause risks not only the environment but also the impression that tourists will have about the island. Military exercises may discourage tourists from returning to visit the Big Island in the future, undermining the state's economy.

I would respectfully request that these exercises be moved to a much more remote and less environmentally sensitive area of Hawaii that would be much more suitable for these kinds of exercises.

Thank you for your consideration,

Rebecca Malamed MD
Online: www.drrebecca.com



DEPARTMENT OF THE NAVY

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NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Tim Gonzalez (tkgonzo@gmail.com)

Dear Tim Gonzalez:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 28, 2018 comment letter from Tim Gonzalez.

Copy to: Hawaii Department of Land and Natural Resources

From: Tim Gonzalez <tkgonzo@gmail.com>
Sent: Wednesday, November 28, 2018 10:41 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military training along Kohala Coast

We support our military, and appreciate the need to properly train our soldiers. But surely you can identify some other places in the Hawaiian islands or other island territories of the US, that aren't inhabited by thousands of people, home to several endangered species, and visited by hundreds of thousands of tourists—to conduct your training exercises.

Bad idea to practice your beach landing exercises when whales are in your way, and stand up paddlers have to watch out for undersea frogmen!

Move on to another option.

Tim Gonzalez
tkgonzo@gmail.com
925.683.8065



DEPARTMENT OF THE NAVY

COMMANDER
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850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Topher Dean (topherdean1@gmail.com)

Dear Topher Dean:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

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The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 26, 2018 comment letter from Topher Dean.

Copy to: Hawaii Department of Land and Natural Resources

From: Topher Dean <topherdean1@gmail.com>
Sent: Monday, November 26, 2018 4:51 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] PLEASE, NO.

Dear Project Manager, EV21.JZ,

In response to your proposed war games along our North Kohala coastline. This is one of the most heavily populated areas in the Hawaiian Islands for new born humpback whales. With global warming, toxic runoff, Navy and commercial sonar, ocean plastics and fishing nets and coastal development, the last thing they need, or any wild life needs, is military operations. My Mom and Dad were both Navy Veterans, I know they would be appalled at this proposal.

Please, I beg of you to reconsider disrupting the quite tranquility of our beautiful island home with the thunderous noise of military equipment. I know we've been at war for over 16 years, but we shouldn't be. There is no reason to be at war with anyone, except for selling military hardware, and that is not a good excuse.

--

Fight with aloha,

Topher



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850 TICONDEROGA ST STE 110
JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Alan Pyne (gtojudge70400@yahoo.com)

Dear Alan Pyne:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 30, 2018 comment letter from Alan Pyne.

Copy to: Hawaii Department of Land and Natural Resources

From: alan pyne <gtojudge70400@yahoo.com>
Sent: Friday, November 30, 2018 12:47 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Military operations along kohala coast

Please keep military training operations out of kohala coast. We need to keep the marine life healthy and by bringing training exercises there i feel it will have a damaging effect to marine life off of kohala coast Sent from my iPhone



DEPARTMENT OF THE NAVY

COMMANDER
NAVY REGION HAWAII
850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Marsha Kerley (maleka27@gmail.com)

Dear Marsha Kerley:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: November 30, 2018 comment letter from Marsha Kerley.

Copy to: Hawaii Department of Land and Natural Resources

From: Marsha Kerley <maleka27@gmail.com>
Sent: Friday, November 30, 2018 1:58 PM
To: NFPAC-Receive
Cc: Tom Kerley
Subject: [Non-DoD Source] Big Island proposed excercises

We have a lovely place to live and even though I understand that trainings can be necessary, the impacts on humans and especially our already negatively impacted marine life, is not worth it. If we destroy the environment we live in, what will be left to protect?

Mahalo, Marsha Kerley



DEPARTMENT OF THE NAVY

COMMANDER
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JBPHH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Corinne Yee (aokiye@gmail.com)

Dear Corinne Yee:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2), an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including the monk seal and its critical habitat. The Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

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N45
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 1, 2018 comment letter from Corinne Yee.

Copy to: Hawaii Department of Land and Natural Resource

From: Corinne Yee <aokiyee@gmail.com>
Sent: Saturday, December 1, 2018 6:01 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Comments on NSWC Draft EA - New Proposed Military Training

The Navy has proposed just an EA as evidenced by its draft EA and publication for comment. However, there is public opposition to the proposed federal action on numerous grounds, showing that the proposed federal action is highly controversial with uncertain potential significant impacts on the environment. There is a likelihood of significant adverse impacts on endangered species, marine mammals, migratory birds, and critical habitat, as well as on historic properties protected by the National Historic Preservation Act (NHPA). In light of all these concerns, the Navy should prepare an EIS and hold a public hearing. The Navy has only initiated its consultations with USFWS and NMFS under Section 7 of the ESA and under the MSA, so the Navy and the public do not know the concerns and positions of the involved federal agencies or what those agencies will require in mitigation of all the potential adverse effects.

In addition, the Navy has only initiated the Section 106 consultation under the NHPA and has not received concurrence from the SHPO or the ACHP with the Nav's finding of no adverse effect under the NHPA. I don't think it's necessarily true that there are no Traditional Cultural Properties (TCPs) that could be affected by the proposed federal action. There are fishing and diving sites that are likely to be affected. The Navy has not adequately surveyed for the presence of any TCPs. In addition, the definition of the Area of Potential Effects (APE) is much too narrow. It should not be limited to just the areas of the proposed new military training. The EA states that the fishes will swim away from the areas of training. Wherever the fishes swim out of and to have the potential for being adversely affected, not just the areas of proposed new military training. The proposed federal action is huge, diverse, and complicated. It covers numerous and large new areas that have not been subjected to military training in the past. As the proposed federal action is complex, highly controversial, and has uncertain potential significant impacts on the environment, an EA is seriously insufficient. The Navy is required to prepare an EIS for the proposed federal action. Consultations required by law should be completed so that they can be explained and analyzed in the NEPA document to afford the public a meaningful opportunity to comment on all aspects of the proposed federal action.

The proposed federal action will take place not just on federal military property, but also on property owned by the State of Hawaii and perhaps on other properties owned by others. The Navy may not proceed with its proposed federal action without first obtaining the required real estate rights from the other landowners whose properties may be involved. In addition to the present NEPA action, the Navy is also required by law to prepare a NEPA document for its Proposed Action of acquiring new real estate rights in order to conduct its proposed new training actions. The State of Hawaii is required to prepare its own environmental planning document in deciding to whether to grant new real estate rights to the Navy, pursuant to the Hawaii State law similar to the federal NEPA.

Corinne Yee



DEPARTMENT OF THE NAVY

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850 TICONDEROGA ST STE 110
JBPBH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

Cynthia Potter (hawaiicyndi@yahoo.com)

Dear Cynthia Potter:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2), an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

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NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also

coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources. The Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 1, 2018 comment letter from Cynthia Potter.

Copy to: Hawaii Department of Land and Natural Resources

From: Cynthia Potter <hawaiiicyndi@yahoo.com>
Sent: Saturday, December 1, 2018 8:52 AM
To: NFPAC-Receive
Subject: [Non-DoD Source] Mahukona

I have lived in Hawi, Hawaii on the Big Island for 19 years. As a home owner, tax payer and voter, I strongly urge you to reconsider doing military maneuvers at Mahukona. Everyday, people from North Kohala and Kona enjoy the park for swimming, diving, fishing, picnics and family and friend gatherings. It's close proximity to our area makes it the perfect place for our recreational activities. I feel what you are proposing would disrupt the eco system that we have left ie the fish and underwater growth. Not to mention the people when we go there to enjoy quiet and serene ocean activities.

Please do not do the proposed military activities at Mahukona, or really anywhere that people enjoy being by the ocean on the Island of Hawaii.

Thank you, Cynthia Potter



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JBP HH, HAWAII 96860-5101

5000-45E
N45
April 12, 2021

John Winter (winterj@whitman.edu)

Dear John Winter:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

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Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

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The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

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N45
April 12, 2021

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Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 6, 2018 comment letter from John Winter.

Copy to: Hawaii Department of Land and Natural Resources

From: John Winter [mailto:winterj@whitman.edu]
Sent: Thursday, December 06, 2018 11:32 AM
To: sam.j.lemmo@hawaii.gov; Ostrem, Meagan K <Meagan.Ostrem@ManTech.com>
Subject: DEA for Military Exercises on the Kohala Coast

Aloha.

My name is John Winter. I see that the U.S. Naval Special Warfare Command (NSWC) has prepared a Draft Environmental Assessment (DEA) to analyze the potential impacts of proposed naval special operations training in the State of Hawaii. I have lived in North Kohala for twelve years and have served as chair of the Community Development Plan Action Committee for six of those years. I am writing to express my concern over the proposed exercises for 2019 along our western coastline. I have heard considerable concern over this DEA among our residents and share them, concerns over the impact on our coastlines, wildlife, cultural heritage, recreational fishing and quality of life. The Kohala coastline has parks and an unusually large number of archeological/cultural and burial sites, many of which are not yet properly surveyed or documented. There are also concerns regarding sound levels and the safety of marine and terrestrial animals should troops set foot on land there.

The posted Draft Environmental Assessment has several inadequacies when it addresses North Kohala. Principal among them is the archaeological resource assessment, which misses most sites. The submerged waters assessment and the assessments of effects on marine mammals, monk seals, hoary bats and the cultural gathering and recreational aspects are also weak as they might apply to our coast. I expect the Navy will ask for an Anticipated Finding of Non-Significant Impact (AFONSI) so they can proceed quickly. Their DEA is clearly not as complete as normally required for such extensive operations, and they should develop a full Environmental Impact Statement (EIS) to prepare adequately for a program of this magnitude and potential impact.

Thank you for your consideration. John

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John D Winter
Academic in Recovery
PO Box 849
Kapa'au HI 96755
(808) 889-6901
<http://www.whitman.edu/geology/winter>



DEPARTMENT OF THE NAVY

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850 TICONDEROGA ST STE 110
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5000-45E
N45
April 12, 2021

Tom Mitchell (tom@thomasmitchell.com)

Dear Tom Mitchell:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

Chapter 2 (Proposed Action and Alternatives) of the Draft and Final EAs describes the Proposed Action and specifies how it would be implemented. In particular, Section 2.1 describes the proposed training; Tables 2-2, 2-3, 2-4, and 2-5 describe equipment to be used, lays out the regions where the various types of training would occur, and describe the maximum frequency of training. Section 2.5 (Alternatives Development), identifies Alternative 2 as the Preferred Alternative; and Section 2.6 (Best Management Practices and Standard Operating Procedures) describes practices and procedures to avoid, minimize or reduce effects to the environment. Details of implementation as they relate to environmental consequences are further explored in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs. Training would be conducted only after the completion of the National Environmental Policy Act process and rights of entry or other real estate agreements are obtained. The use of specific training sites is contingent on receiving appropriate real estate approvals (Section 2.2).

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the

areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2), an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training. Therefore, there would be no aircraft-related noise impacts associated with the Proposed Action and the Federal Aviation Administration guidelines for noise impacts do not apply.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the USFWS and NMFS for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the

State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG
Director
Regional Environmental Department
By direction of the Commander

Enclosure: December 1, 2018 comment letter from Tom Mitchell.

Copy to: Hawaii Department of Land and Natural Resources

From: Tom Mitchell <tom@thomasmitchell.com>
Sent: Saturday, December 1, 2018 12:14 PM
To: NFPAC-Receive
Subject: [Non-DoD Source] Kohala Coast / NSO HI EA November

To whom it may concern:

As a long time Kohala Coast / Hawi resident, I am deeply troubled over the Navy's training plans as stated in the "Draft EIS" Assessment / November 2018 Naval Special Operations.

There is a lot of substance in that assessment, which seems to be purposefully vague and without any concrete plans.

Please answer the following:

How does the Navy plan to handle the noise ordinance as defined by the FAA?

Who is going determine which plan or alternative will be put in to action?

How will that plan be determined?

Who and how is it going to assess the impact on the environment, sea life, public safety and impact and cultural heritage of the area?

What is the definition of Federal and non- Federal lands.

Where are these Federal and non-Federal lands?

The words generally and approximately are used frequently. Please define those word as it relates to this document.

Why have there been informal discussions instead of a complete EIS?

What is the difference between an Event and a Training activity, if an?

How many personnel, equipment and support workforce does each event or training activity contain?

The document states support staff would be on hand. Please define what this means

What is the proposed impact to the roads and infrastructures?

The area has a Critically High Grass and Brush Fire rating. How do you plan to mitigate that concern?

What is the definition of a "small ship" and or "host vehicle" to launch UUV's and ROV's?

How can you possible say " no vegetation trampled, no branches broken, no footprints.

The area of the document titled "Table 2-1: Proposed Training Elements", offers very broad definitions that could be interpreted in many ways.

"Table 2-1: Proposed Training Elements", as well as many other areas of the document, including what the document calls "proposed change" contains too many obscure statements, such as "The Navy does not anticipate any adverse effects..." to adequate list and request further definition and information in this email / letter.

There are hundreds of other questions and concerns with regards to the potential impact and way of life in our communities.

The Kohala Coast line and adjacent areas are unlike any other footnoted references in your document. It has a rich cultural history and heritage, tourism, wildlife and sea life and fragile eco systems.

Your plans, and the consequences of those plans, to disrupt our way of life and history are unacceptable.

I adamantly call for an immediate mandate to end this proposal.

Respectfully,
Tom Mitchell

~~~~~

Tom Mitchell  
P.O. Box 1011  
Kapaau, HI 96755  
808-889-1988



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Ginger Buckley ([gingersu@icloud.com](mailto:gingersu@icloud.com))

Dear Ginger Buckley:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any

training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 6, 2018 comment letter from Ginger Buckley.

Copy to: Hawaii Department of Land and Natural Resources

From: Ginger Buckley [<mailto:gingersu@icloud.com>] Sent:  
Thursday, December 06, 2018 3:47 PM  
To: Ostrem, Meagan K <Meagan.Ostrem@ManTech.com>  
Subject: No to military operations

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Thank you for taking time to read your constituency's comments. I am a resident of north Kohala, in the 'blue zone'. I moved here because of the healthy environment. It is one of the healthiest places to live on Earth. Please do your due diligence on the effect of proposed operations on the waters and land of north Kohala. this area is one of the premier spots on the big island. It is the recreation area for so many tourists and residents alike . Our state parks are there , and it is a prime area for the whale and dolphin population.

Whales are responsible for clean waters , healthy waters and healthy air , see new releases on how they decrease carbon in our atmosphere.

I trust you will take all consideration in hand and make a decision to move operations where there will be less impact on our natural sanctuary for people and animals alike.

Thank you , Ginger Buckley

Sent from my iPhone

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## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Kealoha Sugiyama ([acallforlove@gmail.com](mailto:acallforlove@gmail.com))

Dear Kealoha Sugiyama:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

During the development of the alternatives, Naval Special Warfare Command considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors) of the Draft and Final EAs. Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 (Training Area Screening Factors) are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them

in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 6, 2018 comment letter from Kealoha Sugiyama.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kealoha Sugiyama [mailto:acallforlove@gmail.com]  
**Sent:** Thursday, December 06, 2018 7:08 PM  
**To:** sam.j.lemmo@hawaii.gov; Ostrem, Meagan K <Meagan.Ostrem@ManTech.com>  
**Subject:** Navel Exdrcises on the Kohala Coast

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It's a proven factor that the U.S. Military is NOT a good steward to all the Hawaiian Islands. Past and present military exercises in the islands has left our islands with warfare pollutants. Hawaii is paradise on earth. Hawaii is sacred place to the Hawaiian culture and it's people.

All the modern warfare today is computerized and robots, so why is the US military creating needless exercises from WWI upon our islands? What is another and better way to waste our tax payers money?

Kealoha Sugiyama  
Hawi, Hawaii 96719



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
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5000-45E  
N45  
April 12, 2021

Ken Bare ([harborsail@hotmail.com](mailto:harborsail@hotmail.com))

Dear Ken Bare:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a study area for purposes of analysis and is greater in area than the sites where training activities would occur.

The Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur.

Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the NHPA for this undertaking, and adequately documented its finding of effect and

fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with the NHPA Section 106. The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (HAR Section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

The Notice of Availability also included a solicitation for individuals or organizations interested in participating in the NHPA Section 106 process: "Concurrent with the National Environmental Policy Act (NEPA) process, the Navy is conducting National Historic Preservation Act Section 106 consultations regarding potential effects of the Proposed Action on historic properties. NSWC has determined that the naval special operations training is considered an undertaking as defined in the National Historic Preservation Act 36 CFR §800.16(y) and has the potential to cause effects on historic properties. Pursuant to 36 CFR §800.2(d), 800.3(b), and 800.3(e), the Navy is soliciting members of the Public who wish to participate as consulting parties in the National Historic Preservation Act Section 106 process associated with this Undertaking. If interested in participating, provide written notification at the email or physical addresses below within 30 days of this notice."

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 7, 2018 comment letter from Ken Bare.

Copy to: Hawaii Department of Land and Natural Resources

From: Ken Bare <harborsail@hotmail.com>  
Sent: Friday, December 7, 2018 12:13 PM  
To: sam.j.lemmo@hawaii.gov  
Cc: Zimmerman, Julie M CIV NAVFAC PAC, EV21 <julie.zimmerman@navy.mil>  
Subject: [Non-DoD Source] Molokai Naval special operations training

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Hi, I would like to give some input on the environmental assessment. 1. they should come to Molokai and tell the community their plans and hear from us first. Very inadequate public comment period. I didn't hear of this till dec. 6th. 2. Jetskis are illegal inside and near shore on molokai. Fast boats and jet skis are a grave danger to Monk seals and sea turtles. They should have a speed limit on their manouvers and no jet skis allowed. 3. They will require a security zone, no mention of how large or often. This will keep people from gathering food that is critical on molokai. 4. The military has a horrible record on Molokai of taking care of the land they use. Near illio point there are still signs telling people to stay off the dlnr Land. Up the forest road near red hill, there is still a lot of junk left over from their last training. Untill all this is clean they should not be allowed on molokai. 5. Currently they fly the harrier, helicopter like aircraft low over Molokai, far east of the airport, without concern for us. It rattles our house. No reason to fly over land. There are miles of ocean. There was also a meeting on Molokai to use the airport for touch and goes, they promised to not fly over the rest of the island. They Lied. I could come up with more reasons given time, but their no impact of cultural, terrestrial or marine life is a bad joke. 6. With this situation, lack of respect for this community there will be large protests. Thanks,  
Ken Bare



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Keith Neal ([keithneal327@gmail.com](mailto:keithneal327@gmail.com))

Dear Keith Neal:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2), an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also



coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources. The Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 7, 2018 comment letter from Keith Neal.

Copy to: Hawaii Department of Land and Natural Resources

**From:** keith neal [mailto:keithneal327@gmail.com]  
**Sent:** Friday, December 07, 2018 2:34 PM  
**To:** Ostrem, Meagan K <Meagan.Ostrem@ManTech.com>  
**Subject:** Naval Exercises in Kohala

---

ManTech International Corporation;  
420 Stevens Ave., Suite 300, Solana Beach, CA 92075

SUBJECT: Naval Exercises in Kohala

Dear Meagan Ostrem,

I object to the near 500 planned military exercises on public and private lands in Kohala, Hawaii island. These areas are occupied with, or proximate to citizens and wildlife. Additionally, these areas are in recovery from several climate and over use impacts in recent years and far too environmental sensitive to endure such actions.

May I suggest these exercises be conducted on/near Kahoolawe, away from the public. Kahoolawe has been set aside for military exercises. There are no compelling reasons to create more military sacrifice zones.

Furthermore, the U.S. military has yet to make good on the promise to clean up and restore impacted lands as far back as World War II.

Sincerely,

Keith Neal  
Kamuela, Hi 96743



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Amihan Voyager ([amihanvoyager@gmail.com](mailto:amihanvoyager@gmail.com))

Dear Amihan Voyager:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Amihan Voyager.

Copy to: Hawaii Department of Land and Natural Resources

**From:** amihan voyager <amihanvoyager@gmail.com>  
**Sent:** Tuesday, December 4, 2018 3:41 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Kohala

Strongly oppose military exercises on kona kohala coast  
Heavy public use area



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Brad Bordessa ([bbordessa@gmail.com](mailto:bbordessa@gmail.com))

Dear Brad Bordessa:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2), an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also

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coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Brad Bordessa.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Brad Bordessa <[bbordessa@gmail.com](mailto:bbordessa@gmail.com)>  
**Sent:** Tuesday, December 4, 2018 1:36 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] NO to Kohala Military Training

Aloha,

I oppose the proposed military training exercises in West Hawai'i for 2019. This where my friends and family hang out! Military presence doesn't make us feel safer. It's intimidating to everyone around and creates a bulls eye target for the rest of the world.

The military is an unwelcome addition to our home. We don't need them expanding their training locations ANYWHERE in Hawai'i, certainly not the beautiful, untouched waters of North Kohala.

Keep it as it is. Use your alternative locations.

Sincerely,

Brad Bordessa  
Ahualoa, Hawai'i

Musician & Educator  
(808) 936-1903  
[bradbordessa.com](http://bradbordessa.com) <<http://bradbordessa.com>> - [liveukulele.com](http://liveukulele.com) <<http://liveukulele.com>>





## DEPARTMENT OF THE NAVY

COMMANDER  
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April 12, 2021

David J. Swatland ([dswatland@gmail.com](mailto:dswatland@gmail.com))

Dear David Swatland and Margaret Wille:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

The increased training requirement is in accordance with the Naval Special Warfare Command (NSWC) meeting its Title 10 U.S. Code Section 167 mandate as discussed in Section 1.3 (Purpose of and Need for the Proposed Action) in the Draft and Final EAs. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

Chapter 2 (Proposed Action and Alternatives) of the Draft and Final EAs describes the Proposed Action and specifies how it would be implemented. In particular, Section 2.1 describes the proposed training; Tables 2-2, 2-3, 2-4, and 2-5, describe equipment to be used, lay out the regions where the various types of training would occur, and describe the maximum frequency of training. Section 2.5 (Alternatives Development) identifies Alternative 2 as the Preferred Alternative; and Section 2.6 (Best Management Practices and Standard Operating Procedures) describes practices and procedures to avoid, minimize or reduce effects to the environment. Details of implementation as they relate to environmental consequences are further explored in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs. Training would be conducted only after the completion of the NEPA process and rights of entry or other real estate agreements are obtained. The use of specific training sites is contingent on receiving appropriate real estate approvals (Section 2.2).

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules section 11-200-12 and 40 Code of Federal Regulations [CFR] Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft EA, consultations with the U.S. Fish and Wildlife Service, National Marine Fisheries Service, and State Historic Preservation Officer, coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly

impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

As described in Chapter 3, all potentially relevant environmental resource areas were initially considered for analysis in the Draft and Final EAs. In compliance with NEPA, Council on Environmental Quality regulations, and 32 CFR Part 775, the discussion of the affected environment (i.e., existing conditions) focuses only on those resource areas potentially subject to impacts. Additionally, the level of detail used in describing a resource is commensurate with the anticipated level of potential environmental impact.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. Chapter 3 of the Draft and Final EAs presents an analysis of the potential direct and indirect effects with implementation of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA). The activities are similar to those conducted by the general public.

Air quality is analyzed in Section 3.1 of the Draft and Final EAs, and air quality calculations are presented in Appendix B. Transportation vehicles, vessels, aircraft and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on the ambient air quality of the region. In addition, the dispersive nature of the proposed activities would prevent pollutants from concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed the National Ambient Air Quality Standards. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination. Therefore, no significant impacts on air quality would occur with implementation of Alternative 2 (Preferred Alternative).

As stated in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs, trainees would avoid animals in the water, such as Hawaiian monk seals and sea turtles, and would not approach animals resting on the beach. When in the presence of whales, personnel would shut down boat engines in accordance with boating regulations and Navy procedural instruction. Vessels used in training would not bottom out or come ashore in sensitive habitats, such as coral. When training on land, sensitive habitats, such as known bird nesting areas, would be avoided.

The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including the monk seal and its critical habitat. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). Under the Marine Protection, Research, and Sanctuaries Act (16 USC section 1431 et seq.) (also known as the National Marine Sanctuaries Act), the Secretary of Commerce may establish a national marine sanctuary for marine areas with special conservation, recreational, ecological, historical, cultural, archaeological, scientific, educational, or aesthetic qualities. Once a sanctuary is designated, the Secretary of Commerce may authorize activities in the sanctuary only if they can be certified to be consistent with the National Marine Sanctuaries Act and can be carried out within the regulations for the sanctuary. Regulations exist for each sanctuary, and military activities may be authorized within those regulations.

Section 304(d) of the National Marine Sanctuaries Act requires federal agencies to consult with the Office of National Marine Sanctuaries whenever their proposed actions are likely to destroy, cause the loss of, or injure a sanctuary resource. The Hawaiian Islands Humpback Whale National Marine Sanctuary is a single-species managed sanctuary, composed of waters around Maui, Lanai, and Molokai; and smaller areas off the north shore of Kauai, off the Island of Hawaii's west coast, and off the north and southeast coasts of Oahu. All of the proposed naval special operations training activities that would occur within the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final Environmental Impact Statement (EIS)/Management Plan for the Sanctuary, which under the Hawaiian Islands Humpback Whale National Marine Sanctuary regulations do not require permits or further consultation under Section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The proposed training activities addressed in the Draft and Final EAs are the same classes of activities previously analyzed in the Navy's 2013 and 2018 Hawaii-Southern California Training and Testing (HSTT) Final EISs/Overseas EISs and for which the Office of National Marine Sanctuaries found no consultation was required. The activities proposed in this EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 HSTT Final EISs/OEISs and, therefore, consultation is not required.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy has identified a number of historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. The training study area is larger than the actual area that would be used for the proposed training due to the training's sensitivities and would be limited to smaller sites on federal land and on state and private lands that have the consent of property owners before training activity occurs.

Training activities would not interfere with public use of land or water areas for recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 28, 2019 (*sic*) comment letter from David Swatland and Margeret Wille.

Copy to: Hawaii Department of Land and Natural Resources

David J. Swatland, Esq.  
PO Box 1640  
Kapa'au, HI 96755  
[dswatland@gmail.com](mailto:dswatland@gmail.com)

December 28, 2019

Naval Facilities Engineering Command Pacific  
Attention: Project Manager, EV21.JZ  
258 Makapala Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
[NFPAC-Receive@navy.mil](mailto:NFPAC-Receive@navy.mil)

Re: Draft Environmental Assessment (DEA) for Naval Special Operations Training, State of Hawaii.  
November 2018

Dear Naval Facilities Engineering Command Pacific,

Please consider this correspondence as public comment on behalf of myself and Margaret Wille regarding the DEA for expanded Navy Special Operations (SpecOps) training in the State of Hawai'i, specifically along Hawai'i Island's Kona and Kohala coasts. As a retired U.S. Coast Guard Captain and the former Deputy and Acting Superintendent of Papahānaumokuākea Marine National Monument, I am quite familiar with reviewing DoD NEPA documents. The Navy's DEA is not in compliance with current National Environmental Policy Act (NEPA) regulations, as outlined below. Beyond the Navy's lack of compliance with NEPA, there are a number of reasons why the Navy's plans for expanded training on the west coast of Hawai'i Island are inappropriate, due to the negative impacts on the area's natural and cultural resources and on the community. This expansion of military training to non-federal lands across the state under the guise of "training scenario variety" is nothing more than a thinly veiled effort to increase the military's already expansive footprint across the Hawaiian Islands. This proposed expansion is unnecessary, bad for the environment and the community, and extremely unpopular with the local population.

A. The Navy's proposed training study areas lie within the boundaries of the Hawaiian Islands Humpback Whale National Marine Sanctuary (HHWNMS) around the islands of Hawai'i, Maui, Moloka'i, Lana'i, and O'ahu. As required by both NEPA (40 CFR § 1501.2 "Applying NEPA early in the process" and 40 CFR § 1501.6 "Cooperating Agencies") and the National Marine Sanctuaries Act (NMSA) [Section 304(d) / 16 USC § 1434(d) "Interagency Cooperation"], the Navy is required to formally consult with the Office of National Marine Sanctuaries (ONMS) at the earliest possible time in the preparation of any NEPA documents. There is no evidence of such consultation in the DEA. It does not list the NMSA in Section 1.6 "Relevant Laws and Regulations", and the DEA only mentions consulting with the U.S. Fish & Wildlife Service (FWS), the National Marine Fisheries Service (NMSF), the State of Hawai'i Office of Coastal Zone Management (OCZM), and the State of Hawai'i Historic Preservation Division (SHPD). Failure to comply with both NEPA and NMSA invalidates the current DEA.

B. The DEA states that a number of resource areas were not addressed in DEA because the potential impacts of the Navy's SpecOps training would be "negligent or non-existent". The fact that the Navy did not even analyze the impacts on water quality or of underwater noise is truly mind-boggling. NEPA requires all federal agencies proposing an action "significantly affecting the quality

of the human environment?” to conduct a detailed analysis of the environmental impacts of the proposed action. How does the Navy know its proposed actions will have negligible or non-existent impacts if it doesn’t even analyze them?

- Hawai‘i Island’s west coast waters are among the cleanest, clearest and most biologically diverse in the state. Especially along the coast from Kawaihae to Mahukona, the lack of development, terrestrial water run-off, and convenient access make this area an incredible treasure of unspoiled habitat. The reefs are vibrant and healthy and full of marine life. This particular coast, along with areas around Maui, is also one of the primary breeding areas for humpback whales, who are often seen within yards of the shoreline. This coastline exists like this because of State and local government and community efforts to keep it this way, a task becoming ever more difficult against the pressures of continued development and the impacts of global climate change. Hawai‘i Island coral reefs have seen several bleaching incidents in recent years due to increased ocean temperatures; it’s critical that stressors on the marine environment be kept to a minimum in an effort to minimize future bleaching events.
- Though the Navy continues to discount the impacts of underwater noise on marine life, especially marine mammals, valid scientific studies have consistently documented the harmful effects of anthropogenic noise on marine animals, including alterations in behavior and permanent or temporary hearing loss, which likely have contributed to the many mass stranding events in recent years. Bringing more underwater noise to the one of the primary humpback whale breeding grounds, and where spinner dolphins, the endangered Hawaiian false killer whale, and the critically endangered Hawaiian monk seal live, is just not a positive development for these species.
- Contrary to the information provided in the DEA, critically endangered Hawaiian monk seals do often inhabit the shallow waters of the proposed training areas as they access the shoreline. The Big Island’s Kohala coastline has many popular haul-out locations for the monk seal due to the inaccessibility of much of the coastline to human activity.

A significant increase in Navy training operations in these areas will only have negative impacts on the marine environment, both in the short term and cumulatively.

C. The Navy’s Best Management Practices (BMP) for Naval SpecOps training in Table 2.6 state that “If marine mammals or ESA-listed marine species are noticed within 50 yds. (45.7 m) of the training activities, training may continue only if, in the best judgment of the marine species observer, the activity would not affect the animal(s).” This practice is direct conflict with IIIIWNMS regulations requiring everyone to always remain 100 yards away from humpback whales. In addition, the BMPs for air-based training activities in Table 2.6 fail to mention both the ESA and IIIIWNMS regulations requiring aircraft to remain at least 1,000 ft from humpback whales at all times.

D. The DEA’s analysis of potential impacts to cultural resources is woefully inadequate with regards to Hawai‘i Island. The document makes absolutely no mention of the Ala Kahakai Trail, designated in 2000 and administered by the National Park Service (NPS) for the preservation, protection, and interpretation of traditional Native Hawaiian culture and natural resources. The Trail, a recent addition to the National Historic Trails program, runs right through the entirety of both proposed training areas on Hawai‘i Island’s west coast. Aside from Lapakahi State Historical Park, the DEA also fails to mention the hundreds of Native Hawaiian cultural sites along the South and North Kohala coast. Just because a location is not on a federal or state list of ‘historical sites’ does not mean a place lacks profound and lasting cultural value to the local population. The DEA also ignores the rich terrestrial and sub-marine history of Mahukona in North Kohala, the terminus for the

sugar cane train and loading port for vessels transporting the sugar cane around the state. The waters around Mahukona, in addition to being rich with coral reefs and marine life, are also home to a trove of historical artifacts from the sugar cane era. The Kohala coastline is also home to numerous hiking trails and ocean access points used daily by locals and tourists alike. Mahukona is a primary access location for swimmers, snorkelers, paddlers, etc., and is a popular community gathering place most every day of the week.

E. In addition to ignoring most of the important historical and cultural resources along Kona and Kohala coastlines, the DEA completely fails to address the impacts of the presence of Navy personnel, aircraft, vehicles, vessels, etc. on Native Hawaiian culture, and on the community. Native Hawaiian culture and traditional practices are based on ancestral connections that comprise a sense of place and identity; a place can have sacred significance even if there are no structures or monuments there. Part of that sense of place is experiencing and observing the environment as their ancestors have for generations, something the deep historical roots of Hawai'i Island's west coast provide in abundance. Since the 1970s, Hawaiian culture has undergone a revival, with examples such as Hawaiian language revitalization, expeditions on traditional voyaging canoes, inter-tidal zone monitoring, experiential research during solstice & equinox events, Hawaiian language immersion expeditions, at sea education & culture programs, and the documentation & assessment of cultural sites throughout the islands. The presence of Navy assets during any of these activities would likely be disruptive; actual operations (aircraft low passes, beach landings, vehicle movements, etc.) would certainly be disruptive. Many people who venture along the west coast of Hawai'i Island for research, educational, recreational, etc. activities are also approaching their activities with a cultural mindset: conducting protocols that include chanting upon entering and leaving a place, or before and after doing something; observing not just what is right in front of them but what is all around them. We know this can be difficult concept for the military to grasp but saying there is no impact on cultural resources or practices just because the Navy training "would not restrict the ability of individuals to use or access sites" is short-sighted and completely misses the bigger picture of Hawaiian culture and its relationship to the environment.

F. The DEA frequently ignores the impacts of global climate change in analyzing the impact of Navy operations on Hawaii's environment. While the region's northeast tradewinds used to keep the state's air relatively clean by carrying away locally generated contaminants, a 2012 University of Hawai'i study showed that the number of tradewind days in the state has decreased almost 30% in the past four decades, resulting in a significant increase in hot, humid, low wind weather and a decrease in air quality, especially due to 'vog' emitted by Hawai'i Island volcanic activity. As long time residents of the Big Island, we can attest to the change in weather patterns that the Navy ignores. The "consistent trade winds" the Navy seems to be relying on to "efficiently carry away air contaminants" and "promote effective dispersal" are no longer consistent and should not be part of the Navy's 'plan' to deal with air pollution its exercise produce.

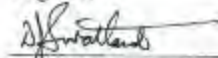
G. NEPA requires the Navy to justify why it needs to conduct a proposed action in a certain place, as opposed to a different place. The DEA's claim that the Navy cannot provide combat ready forces under 10 U.S.C. § 167 due to lack of 'training scenario variety' unless it conducts training on the Big Island's west coast is without merit. The U.S. government is the second largest land owner in the State of Hawai'i; the federal footprint covers over 500,000 acres or almost 13% of the State's land. Nothing in the DEA justifies why the Navy cannot conduct diverse and productive training at anyone of the huge military bases in the State (JBP III, Marine Corps Base Kaneohe, PMRF, Pohakula Training Center, Schofield Barracks, etc.), or for that matter, at any of the national parks in

the state, instead of on a relatively undisturbed stretch of coastline rich in natural and cultural resources and treasured by the local community and tourists (the driver of the State's economy) alike.

H. Finally, and related to F. above, conducting training operations at remote locations along Hawai'i Island's west coast also conflicts with the "Training Area Screening Factors" outlined in Section 2.4 of the DEA. The proposed training areas do not have ready access to "multiple military medical facilities" or even a "broad availability of on-call medical facilities". Nor is there ready access to lodging, maintenance support, or the logistical needs to support the "unique training and operational requirements for naval special operations personnel" where the "proximity of secured Navy facilities/installations is critical."

In summary, the Navy's DEA does not comply – in multiple ways – with NEPA requirements to examine the potential impacts of the proposed action. In addition, conducting Navy SpecOps training in an area of significant natural and cultural resources treasured by the community when there are other more appropriate locations is just plain wrong. These cultural resources are sacred and revered by visitors from around the state and the mainland, as well as attracting international visitors, important not only on a socio-cultural basis but also on a socio-economic basis. Both Margaret and I live on or near the Kohala coastline, and like many others in the community and many tourists on the Big Island, we visit the proposed Navy training areas on a regular basis to experience the natural beauty, the incredible diversity of natural and cultural resources, and the joy of being someplace less impacted by humans. Navy training will disrupt these activities for everyone and will forever alter the unique land- and sea-scape of Hawai'i Island. We recommend that the Navy consider drafting an Environmental Impact Statement (EIS), as a properly drafted EA for the proposed actions cannot possibly result in a Finding of No Significant Impact (FONSI). Failure to conduct the appropriate NEPA analysis and/or reduce the number of non-federal training locations will most certainly result in legal action against the Navy.

Regards,



David J. Swatland, Esq.  
Captain, U.S. Coast Guard (Ret.)



Margaret Wille, Esq.





## DEPARTMENT OF THE NAVY

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April 12, 2021

Dorothy McCorrison (djmhawi@gmail.com)

Dear Dorothy McCorrison:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2), an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also

coordinates with local police departments and law enforcement prior to conducting training activities. All training activities would be non-invasive and do not include construction. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, building camp fires, or leaving human waste at any training site.

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Dorothy McCorriston.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Dorothy McCorriston <djmhawi@gmail.com>  
**Sent:** Tuesday, December 4, 2018 6:19 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] military exercises in No. and So. Kohala

Dear Sir or Madam:

I oppose military exercises taking place at Mahukona and Kawaihae. The quality of life, ancient artifacts and endangered species would be negatively impacted in the area.

Since the sugar mills closed, many Kohala residents drive long distances to work, which can often be a 3 hour commute both ways. In the past on the Big Island, I have been stuck behind long lines of military convoys going 20 miles an hour (which never pulled over to let people safely pass) . This makes the long drive to work even longer. Residents have the responsibility of elderly parents and children waiting for our care . . . or a work at a second job.

Mahukona pier is the only nearby place that North Kohala residents can safely access the ocean. It is very busy. Many residents use this place daily for recreation: to swim, fish, boat, dive, walk, camp, picnic, relax, throw a birthday party and watch the sunset.

In addition, Kohala has endangered Hawaiian monk seals that come into Mahukona and other North Kohala coastal areas to get necessary rest. Humpback whales migrate to Hawaii to give birth and mate. By law, Humpback whales should not be disturbed with close physical proximity of boats or people. Military ships, sonar and troops could endanger these magnificent leviathans. Endemic and endangered Hawaiian birds also need protection.

Pre-contact, the Kohala coast had higher populations than today. Artifacts, rock structures for canoes and homes and heiau (temples) from ancient times are up and down the Kohala coast. There are also artifacts from the old railroad and sugar cane plantation times, especially at Mahukona. In fact, at one time, there was a small village with a store in Mahukona. As a kama'aina, I want to preserve precious artifacts of Hawaii's history.

For all the reasons above, please do not perform military exercises in the Kawaihae to Mahukona corridor.

Mahalo,  
Dorothy McCorriston



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Les Forrest Arnold ([forrest@elitepacific.com](mailto:forrest@elitepacific.com))

Dear Les Forrest Arnold:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Please note that Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

Based on the analysis presented in the Draft and Final EAs; consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), Hawaii Office of Planning, Coastal Zone Management (CZM) Program, and State Historic Preservation Officer (SHPO); coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified for any areas being proposed for training. Correspondence regarding the consultation efforts with the USFWS, NMFS, Hawaii CZM Program, and SHPO is presented in Appendix A (Agency Correspondence) of the Final EA.

All training activities would be non-invasive in nature and the Navy has no intention or authority to close public beaches. Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in

duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence during and after proposed training activities. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals and other special-status species. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 5, 2018 comment letter from Les Forrest Arnold.

Copy to: Hawaii Department of Land and Natural Resources

**Les Forrest Arnold**

54-247 Honopueo Road—P.O. Box 58, Kapaau, Hawaii 96755  
808-987-2365

December 5, 2018

Naval Facilities Engineering Command Pacific  
Attention: Project Manager EV21.JZ  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawaii 96860-3134

Regarding: Military Exercises proposed for Kohala Coast

Aloha to each of you in service at Naval Facilities Command--

As a Vietnam combat veteran, I am writing to strongly oppose the proposed military exercises along the North Kohala coast.

I hold deep respect for our men and women in service and honor the need for relevant training--yet this coastline remains quiet, pristine and ecologically healthy and thus must be preserved and protected.

The coast is a favorite camping area for local residents and is a protected area frequented by humpback whales during their annual migration.

Just because the area is convenient to the military operations at Kawaihae Harbor does not make it suitable for the exercises proposed.

I have lived in the rare part of Hawaii for 30 years--and appreciate that it is not being developed in housing, golf courses or resort hotels. So while I am in support of good training, this cannot be the place for it.

With thanks and respect--



Les Forrest Arnold 808-987-2365  
US Navy—USS Robison DDG-12  
Vietnam 1972



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

John Hanchett ([ikualua2@yahoo.com](mailto:ikualua2@yahoo.com))

Dear John Hanchett:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a study area for purposes of analysis and is greater in area than the sites where training activities would occur.

Please note that Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places, including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

At the time of the Draft EA, the Navy, on behalf of NSWC, initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Officer (SHPO), National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Consultation has also been completed with the State of Hawaii Office of Planning for Coastal Zone Management Act compliance. Please see Appendix A (Agency Correspondence) of the Final EA for associated correspondence and consultation documents.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 5, 2018 comment letter from John Hatchett.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Ikua Hanchett <ikualua2@yahoo.com>  
**Sent:** Wednesday, December 5, 2018 7:41 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Proposed training Molokai

To whom it may concern,

My name is John Hanchett and I am a resident of the island of Moloka'i, a veteran of the US Marine Corps, a fisherman, and a native Hawaiian homesteader in the Pālā'au Moku (district). I am writing in opposition to the Navy's proposal to expand training into the nearshore waters of south Moloka'i. This area has long been an important fishery for the people of Molokai and includes many areas that allow the proliferation of several species of marine life crucial to the continuation of our subsistence. The area also includes several significant cultural sights that are located in the ocean, confirmed by archeological findings, and EIS statements created for the area. I respectfully implore you to reconsider this proposal.

Mahalo for your time,  
John Hanchett

Sent from my iPhone



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Jim Scancelli ([jimscancelli@gmail.com](mailto:jimscancelli@gmail.com))

Dear Jim Scancelli:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission. A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Jim Scancella.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Jim Scancella <jimscancella@gmail.com>  
**Sent:** Tuesday, December 4, 2018 7:23 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] RE: Environmental Assessment Comment, Kohala Coast

Aloha,

I have read the 'Executive Summary' of the Navy Special Operations Hawaii Environmental Assessment, and believe it is unwarranted and not justified to use the Kohala Coast of the Big Island for your proposed training. The Kohala Coast, from Kawaihae to Mahukona is a pristine and fragile coastal environment which should be protected even more than it is now. What ever your training needs are, they most certainly can be performed in a previously used military area that is accustomed to such exercises. I see no need to use the Kohala Coast for such drills and no where is it stated in the Executive Summary, the need for any unique feature that the Kohala Coast provides, and no where is it stated what specific feature the Kohala Coast has that is needed in this particular training. Please perform your exercise in a previously used military area and not on the Kohala Coast which is home to many threatened species, not to mention the additional cost of such a drill in a 'new' area as opposed to one that has already been approved. In this day of proposed extreme budget cuts, that we are all asked to endure, the military should be no exception from being budget conscience. Just look at the most recent attempt to audit the Pentagon—it was a disaster! Get your house in order then come and vacation on the Kohala Coast.

Aloha,

James Scancella  
Kapa'au, Hawaii



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

JoJo Tanimoto (guavaland622@gmail.com)

Dear Jojo Tanimoto:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWV to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Ground transportation support vehicles are discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training) of the Draft and Final EAs. Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 2, 2018 comment letter from Jojo Tanimoto.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Jojo Tanimoto <quavaland622@gmail.com>  
**Sent:** Sunday, December 2, 2018 9:18 AM  
**To:** NFPAC-Receive; samuel.j.lemmo@hawaii.gov  
**Subject:** [Non-DoD Source] Navy Special Ops Training draft EA

Aloha

Mahalo for the opportunity to provide comments. I am opposed to the No Action, Alternative 1 action, and Alternative 2 actions; because this document does not address issues the community provided in the last 10+years.

Kawaihae is a uniquely important historical community including King Kamehameha residential and political prominence . The residents provided testimony to Bishop Museum prior to Kawaihae Road being built from Waimea to the Kawaihae Harbor.

Marine. 1-This document does not recognize the historical fish spawning area that King Kamehameha used to feed his soldiers, families and harboring utilizes. This historical fish spawning area and the maintenance of the ko'a continue today for food sustinence and recreation. 2-This area gets impacted when the Coast Guard move the harbor buoys, directing large vessels through the ko'a and the shoreline natural resources. The community has worked with each new Commander and continually teach this important resource needed in this community, from the harbor to Malae Pt., including the freshwater pool and stream at Waiakailio which provides the needed resource for certain fish species. 3-Fish inventory has become a valuable resource for north and southKohala because DAR and the West Hawai'i Fishery Council has sanctioned other areas. Training should not happen in the food locations because the fish do move. The sharks and manta rays colonies should be recognized as priority examples.

4-Jet skis and military pontoons in nearshore areas have been a continual complaint. Noise to the residents and spray from the pontoons into our homes, vehicles and yards are not included in this document, and are prone to be disregarded as is dropping anchors on the coral.

Aircraft-1-Over our homes, especially low flying, vibrate our termite structure. 2-There is no recognition to vibration over the National Park heiau s, which were built without cement.

3-Drones are a concern between the ko'a (located approx 1 1/2 miles from shore) to the shoreline.

Land 1-Vehicle and equipment from the harbor onto Kawaihae Rd should be banned from stopping until Queen Ka'ahumanu Highway. Kawaihae Rd has a blind corner and visual impairment that was not included in this document. 2-Signage should be available to the public when the Ala Kahakai is to be used, from Kohala to past Puako. to avoid community contact.

Noxious Hazard. There needs to be included in this document how hazards will be addressed in the fishing ko'a and the nearshore areas. The Coast Guard hopefully will clear the harbor; however, there is no Coast Guard station in Kawaihae to address the growing subdivision development areas in north and south Kohala.

I think these issues need to be addressed finally BEFORE any training occurs in Kawaihae next year.

Mahalo

Jojo Tanimoto

Resident and member of the Aha Moku Island Council

Sent from my iPhone



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 6, 2021

Kanoelani Davis ([molokainuiahina@gmail.com](mailto:molokainuiahina@gmail.com))

Dear Kanoelani Davis:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the Naval Special Warfare Command (NSWC) to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.



During the development of the alternatives, NSWC considered three training area screening factors (training, safety, and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate requirements prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 (Training Area Screening Factors) are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel. The Navy is not proposing to turn natural spaces into militarized regions. The proposed NSWC activities are similar to hiking, swimming, and camping, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

ENG.SHERRI.R  
.1229438936

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ENG.SHERRI.R.1229438936  
Date: 2021.04.06 15:01:44  
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SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 5, 2018 comment letter from Kanoelani Davis.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kanoelani Davis <molokainuiahina@gmail.com>  
**Sent:** Wednesday, December 5, 2018 7:29 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] OPPOSITION TO MILITARY EXERCISES ON MOLOKAI

To whom it may concern:

On behalf of myself, Kanoelani Davis, and my family Miliopuna Davis and Kū Chin, we are in great opposition to the U.S. Navy training exercises in the nearshore waters and above land of the island of Molokai.

This negatively disturbs and impacts our wildlife and fisheries, as well as cultural sites that are found in the ocean, near the shore from Heiau, fishponds, sacred fishing grounds for ceremonial uses. All this information can be found in archeological findings, in the Molokai ranch findings and EIS created in these areas.

There is no reason or necessity to do such training on our island. There is no reason that the military should be exempt from EIS or any other grounds of exceptions. There also needs to be recognition of Native Hawaiian rights as the military and government are improperly both utilizing and enforcing laws that do not pertain to the Native Hawaiians. Please recognize that.

I am here to state that this is against all of our beliefs and cultural and spiritual practices as indigenous people of this land and we follow the laws of the 8 realms that we have responsibilities to as far as we can see.

Sincerely,  
Kanoelani Davis  
PO Box 482278  
Kaunakakai, HI 96748

**ENCLOSURE**



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Kim Nagy ([kimnagy77@gmail.com](mailto:kimnagy77@gmail.com))

Dear Kim Nagy:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one

federal property location), tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 3, 2018 comment letter from Kim Nagy.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kim Nagy <kimnagy77@gmail.com>  
**Sent:** Monday, December 3, 2018 2:59 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Proposed US Naval Training Operations in Kohala

To whom it may concern,

I am a resident of Kohala on the Big Island and have decided to create home here based on the peaceful, quiet, natural environment, the warmth of the people and the in depth connection to nature that living on an island demands. I believe I have good reason to believe that greater military presence on this island will be oppositional to supporting this peaceful lifestyle.

In reading the proposal, it claims that there will be minimal impact on the wildlife and native habitats of marine animals because of the limited number of exercises, yet the proposal does not define the length of time of each 'exercise' or how long these exercises are proposed to continue for. When feeding and resting habits of animals are disrupted over and over again for short or long periods of time, there is a general sense of unease and lack of safety that is created. If this is allowed to continue for long indefinite periods of time, this increases the amount of undue stress in any being, marine and land inhabitants alike, increasing risk to illness and shortening life spans.

The noise pollution created by military crafts and machinery is something that will affect not only marine life but the communities of people that live on the island and also negatively affect the tourism industry, as terrible as that industry can be for the natural resources and animals of the island too. People are coming to live in and visit Hawaii for sanctuary and peace, not to witness and hear military exercises.

Finally, intentionally or not, the US Department of Defense has already shown itself to be the greatest contributor to pollution in the world so far. According to an article on Ecowatch from 2017:

"Producing more hazardous waste than the five largest U.S. chemical companies combined, the U.S. Department of Defense has left its toxic legacy throughout the world in the form of depleted uranium, oil, jet fuel, pesticides, defoliants like Agent Orange and lead, among others.

In 2014, the former head of the Pentagon's environmental program told Newsweek that her office has to contend with 39,000 contaminated areas spread across 19 million acres just in the U.S. alone.

U.S. military bases, both domestic and foreign, consistently rank among some of the most polluted places in the world, as perchlorate and other components of jet and rocket fuel contaminate sources of drinking water, aquifers and soil. Hundreds of military bases can be found on the U.S. Environmental Protection Agency's (EPA) list of Superfund sites, which qualify for clean-up grants from the government.

Almost 900 of the nearly 1,200 Superfund sites in the U.S. are abandoned military facilities or sites that otherwise support military needs, not counting the military bases themselves.

<https://www.ecowatch.com/military-largest-polluter-24087606...>

<[https://l.facebook.com/l.php?u=https%3A%2F%2Fwww.ecowatch.com%2Fmilitary-largest-polluter-2408760609.html%3Ffbclid%3DIwAR3rBjblYrKp-Zjz46D1Z35QLTkxUX5Fn4wPJIBp-DhvsjsjeW34UUISg&h=AT1YSTdMUaX7IF4DvDDoriitzwr6ufsYXkL4pJ0E9qICyhawuNh8tuPDuJRzHo\\_CqIPzM2WsYRVbbTWFw1488ZPjfbLPIuujVJP2HMxi0xUIVOqCTMFJScYDUqPOOJHitivE-ZVW4kH\\_EUL7JMcdPgiSh\\_KT4c6n5g](https://l.facebook.com/l.php?u=https%3A%2F%2Fwww.ecowatch.com%2Fmilitary-largest-polluter-2408760609.html%3Ffbclid%3DIwAR3rBjblYrKp-Zjz46D1Z35QLTkxUX5Fn4wPJIBp-DhvsjsjeW34UUISg&h=AT1YSTdMUaX7IF4DvDDoriitzwr6ufsYXkL4pJ0E9qICyhawuNh8tuPDuJRzHo_CqIPzM2WsYRVbbTWFw1488ZPjfbLPIuujVJP2HMxi0xUIVOqCTMFJScYDUqPOOJHitivE-ZVW4kH_EUL7JMcdPgiSh_KT4c6n5g)>

With such a track record, all the words of your 247 page proposal insisting that your military practices will have no significant impact or negligible impact on the environment starts to mean very little. I would prefer to see you withdrawn from all of the Hawaiian islands, but I am saying definitely stay out of Kohala. I speak for the whales and dolphins and turtles, the fish and birds and coral that cannot speak for themselves. I speak on behalf of the air and water and earth as well as the community of peace loving residents in Kohala. Please leave us in peace.

Aloha,

Kim Nagy



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Laurie Hrdlicka ([jpod727@gmail.com](mailto:jpod727@gmail.com))

Dear Laurie Hrdlicka:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any

training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Overall, there should be no impact to tourism, as the training occurs on a not to interfere basis and there would be no trace of the training.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

While submersibles use a sonar device to report depths to aid in navigation during a proposed training activity, these devices have similar specifications to commercially available "fish finders" and other hand-held sonar devices, which typically generate frequencies over 200 kilohertz (kHz) and source levels less than 160 decibels referenced to 1 micropascal (dB re 1  $\mu$ Pa). Devices with these specifications are considered de minimis sources of sound in the water. No other types of sonar are proposed.

The proposed Naval Special Warfare Command activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence during and after proposed training activities. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 2, 2018 comment letter from Laurie Hrdlicka.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Laurie Hrdlicka <jpod727@gmail.com>  
**Sent:** Sunday, December 2, 2018 1:58 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Proposed military exercises on the Kohala Coast

To whom it may concern,

I implore you to please not proceed in conducting military exercises along the Kohala Coast of Hawaii.

I am involved with conservation programs that educate the public as well as promoting healthy ecosystems here where it is still salvageable. This is a primary breeding and calving habitat for humpback whales, which have significantly decreased in the last several years. Scientists are still boggled by the cause.

Our marine life is tragically declining due to many reasons such as warming ocean temperatures (which has resulted in the loss of major coral reefs), over-fishing and entanglements in fishing gear, as well as pollution from chemicals and plastics that have killed many whales, dolphin and turtles, sharks, seals and sea lions. Commercial Ship noise and traffic that have resulted in fatal ship strikes of endangered whales are also a contributing factor.

Seismic and sonar activity are particularly harmful to marine life. Just this past week there have been 5 incidents of whale strandings, 3 of which were mass strandings, none of which survived.

These newly proposed military exercises along the Kohala Coast would add insult and injury to our marine life. In a world that has proved extremely detrimental to the marine life and our oceans, it would seem our military conducting these exercises has little or no regard for our marine life which is struggling to survive with all the challenges they already endure.

Again, I implore you to please not proceed in conducting these exercises here.

Thank you,



Laurie Hrdlicka





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Mahina Lee ([mahinalee987@gmail.com](mailto:mahinalee987@gmail.com))

Dear Mahina Lee:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. In addition, training proposed on the Island of Hawaii does not include air-based training.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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federal property location), tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 2, 2018 comment letter from Mahina Lee.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Mahina Lee <mahinalee987@gmail.com>  
**Sent:** Sunday, December 2, 2018 12:45 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] No Navy Special Operations Training on Big Island

To whom it may concern,

I am a resident of Kohala on the Big Island and have decided to create home here based on the peaceful, quiet, natural environment, the warmth of the people and the in depth connection to nature that living on an island demands. I believe I have good reason to believe that greater military presence on this island will be oppositional to supporting this peaceful lifestyle.

In reading the proposal, it claims that there will be minimal impact on the wildlife and native habitats of marine animals because of the limited number of exercises, yet the proposal does not define the length of time of each 'exercise' or how long these exercises are proposed to continue for. When feeding and resting habits of animals are disrupted over and over again for short or long periods of time, there is a general sense of unease and lack of safety that is created. If this is allowed to continue for long indefinite periods of time, this increases the amount of stress in any being, marine and land inhabitants alike.

The noise pollution created by military crafts and machinery is something that will affect not only marine life but the communities of people that live on the island and also negatively affect the tourism industry, as terrible as that industry can be for the natural resources and animals of the island too. People are coming to live in and visit Hawaii for sanctuary and peace, not to witness and hear military exercises.

Finally, intentionally or not, the US Department of Defense has already shown itself to be the greatest contributor to pollution in the world so far. According to an article on Ecowatch from 2017:

"Producing more hazardous waste than the five largest U.S. chemical companies combined, the U.S. Department of Defense has left its toxic legacy throughout the world in the form of depleted uranium, oil, jet fuel, **pesticides**, defoliants like Agent Orange and lead, among others.

In 2014, the former head of the Pentagon's environmental program **told Newsweek** that her office has to contend with 39,000 contaminated areas spread across 19 million acres just in the U.S. alone.

U.S. military bases, both domestic and foreign, consistently rank among some of the most polluted places in the world, as perchlorate and other components of jet and rocket fuel contaminate sources of **drinking water**, aquifers and soil. Hundreds of military bases can be found on the U.S. Environmental Protection Agency's (EPA) **list of Superfund sites**, which qualify for clean-up grants from the government.

**Almost 900** of the nearly 1,200 Superfund sites in the U.S. are abandoned military facilities or sites that otherwise support military needs, **not counting the military bases themselves.**

<https://www.ecowatch.com/military-largest-polluter-2408760609.html>

With such a track record, all the words of your 247 page proposal insisting that your military practices will have no significant impact or negligible impact on the environment starts to mean very little. I would prefer to see

you withdrawn from all of the Hawaiian islands, but I am saying definitely stay out of Kohala. I speak for the whales and dolphins and turtles, the fish and birds and coral that cannot speak for themselves. I speak on behalf of the air and water and earth as well as the community of peace loving residents in Kohala. Please leave us in peace. Aloha,

Sincerely,  
Mahina Lee



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Rebecca Jankowski ([jankowskiandbuck@gmail.com](mailto:jankowskiandbuck@gmail.com))

Dear Rebecca Jankowski:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 (Biological Resources) of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Rebecca Jankowski.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Rebecca Jankowski <jankowskiandbuck@gmail.com>  
**Sent:** Tuesday, December 4, 2018 6:07 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Say no to Military exercises Kohala coast 2019

Hello U.S. Navy,

Did you know that the North Kohala coast is a NOAA protected Marine Sanctuary since the 90s? I do not want military practice in these protected waters! The Humpback Whale sanctuary is already seeing a 50% decline in whale sightings this year. The reef is protected from being stepped on by swimmers and skin divers! Please do not violate this sanctuary!

Sincerely, Rebecca Jankowski, Kapaau

Sent from my iPad



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Ronnie Slaven (rhslaven@gmail.com)

Dear Ronnie Slaven:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations; the MV-22 Osprey would not be used.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one

federal property location), tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 5, 2018 comment letter from Ronnie Slaven.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Ronnie Slaven <rhslaven@gmail.com>  
**Sent:** Wednesday, December 5, 2018 1:04 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source]

I have several concerns regarding the EIS report. The entire area is so vague as to where they would actually be conducting operations on the hundreds of miles of coast lines. I do not see any mention of specific Marine sanctuaries, Whale sanctuaries, are there bird sanctuaries? It makes no mention of the staging of personnel, vehicles, and aircraft before during and after. Where do the aircraft go during operations that could last many hours? Are they going to be utilizing local airports? Please take note of the MV-22 at Upolu airport. The Marines had already broken their promise to our community once by conducting operations at Upolu airport when it was supposed to be for emergency purposes only. The MV-22 would come for hours at a time and do numerous takeoffs and Landings. My biggest concerns are the osprey. It's not that they're just loud it's the extreme vibration that can be felt from many miles away. What impacts are they going to have on the whales' population and migration patterns? My second biggest concern is oversight and transparency as to how many operations are taking place at each location. My feeling is you're going to find one or two places ideal for training and abuse those locations. I don't feel the Navy should be abusing the coastlines on the Big Island of Hawaii.

Thanks,  
Ronnie Slaven



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Sandy Lane ([sandsmango@yahoo.com](mailto:sandsmango@yahoo.com))

Dear Sandy Lane:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations; the MV-22 Osprey would not be used.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the

proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Sandy Lane.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Sandy Lane <sandsmango@yahoo.com>  
**Sent:** Tuesday, December 4, 2018 6:45 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Military Exercises on Hawaii Island

I read the following statement from the local paper;

*The activities "may affect but would not adversely affect" five Endangered Species Act-listed plant species and associated critical habitat for two of the species including orangeblack damselfly, two yellow-faced bee species, Hawaiian coot, Hawaiian common gallinule, Hawaiian duck, Hawaiian stilt, Hawaiian goose, Hawaiian hawk, band-rumped storm petrel, Hawaiian petrel, Newell's Townsend's shearwater, Hawaiian hoary bat, oceanic whitetip shark, giant manta ray, green turtle, hawksbill turtle, olive ridley turtle, Hawaiian monk seal and associated critical habitat, blue whale (Central North Pacific Stock), Main Hawaiian Islands Insular false killer whale and associated critical habitat, fin whale, sei whale and sperm whale, according to the EA.*

Here is my statement: The island has lost and is continuing to lose native species of plants and animals, many which are rare or only found here on the islands so I am greatly concerned by any unusual activity that would be repeated and possibly cause a loss such as the abandonment of a nesting site. The army already commands a great deal of land on the island. Certainly a less critical habitat can be located somewhere else. Please reconsider this area.

Thank you,

Sandra Lane



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Vivian Green ([vivianmarita@hotmail.com](mailto:vivianmarita@hotmail.com))

Dear Vivian Green:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations; the MV-22 Osprey would not be used.

The Navy does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the

proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine or terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS) for the proposed action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Vivian Green.

Copy to: Hawaii Department of Land and Natural Resources

**From:** vivian green <vivianmarita@hotmail.com>  
**Sent:** Tuesday, December 4, 2018 12:38 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Navy War Games on South and North Kohala and North Kona Coast on Hawai'i Island

"There **will be adverse affects** in Hawaii on five Endangered Species Act-listed plant species and associated critical habitat for two of the species including orangeblack damselfly, two yellow-faced bee species, Hawaiian coot, Hawaiian common gallinule, Hawaiian duck, Hawaiian stilt, Hawaiian goose, Hawaiian hawk, band-rumped storm petrel, Hawaiian petrel, Newell's Townsend's shearwater, Hawaiian hoary bat, oceanic whitetip shark, giant manta ray, green turtle, hawksbill turtle, olive ridley turtle, Hawaiian monk seal and associated critical habitat, blue whale (Central North Pacific Stock), Main Hawaiian Islands Insular false killer whale and associated critical habitat, fin whale, sei whale and sperm whale. Invasions will be made by naval as well as Army, Air Force and U.S. Marine Corps special ops forces using simulated munitions along the South and North Kohala and North Kona Coast on Hawai'i Island.

There **will also be adverse affects** on the people who live and work and vacation here.

World War II munitions are still being removed from the Waikoloa Region on Hawai'i Island, and that operation will take decades to complete."

Mahalo, Vivian Green, PO Box 385204, Waikoloa HI 96738



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Amanda Rieux ([amandarieux@gmail.com](mailto:amandarieux@gmail.com))

Dear Amanda Rieux:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.



As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of

Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State

Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the ground, or in air, in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Amanda Rieux.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Amanda Rieux <amandarioux@gmail.com>  
**Sent:** Monday, December 10, 2018 4:33 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Protesting the potential expansion of military operations on the Kohala Coast

To Whom it May Concern,

As longterm resident living and working in Kohala I strongly protest the proposed expansion of military operations on the Kohala Coast from Mahukona in North Kohala to just south of Kawaihae in South Kohala.

**I oppose the expanded use of this area for several reasons.**

**1. Environmental impact on animals, plants reef/ocean life and health**

Increased military activity in this sensitive costal area will negatively impact the health and well being of the ocean and reef life there. The increased human presence along with machinery which is powerful and loud and polluting (noted in your own reports \*) will increase stress on the living organisms in the environment from the whales to the plankton and the coral reefs. We have documented a loss of coral and increased pollutants along that part of the coast, especially near the harbor already. Because of global warming, our ocean and reefs are already less resilient than at any time we have documented previously. (If you don't believe in global warming you are not fit to make any decisions about the future of anything living on the planet.)

**2. Open Space**

Hawaii island is renowned for the vast swaths of undisturbed coastline. This coastline is a coveted place to live near to. (Kohala Ranch, Kohala by the Sea...). It is also very close to several of our best resorts on island. (Waikoloa, Mauna Lani, The orchid, the Fairmont/Hapuna, and the Mauna Kea resorts) The open space of ocean and coastline are a resource for the people who live and visit nearby. Imagine the reaction of guests at the Muana Kea for instance.

**3. Cultural Significance of the area:** There are unsurveyed burial caves, up and down that coast. There are several that I know of, and I am certain that there are many more. The fact there is a significant navigational heiau at Mahu Kona indicates that there would be other sites and artifacts that are culturally significant on that part of the coast.

**4. Impact the sense of well being.** Military actions on the coast would add to distress of residents and tourist alike. People coming to Hawai'i to relax, and residents would be distressed to see military activities, machinery and and personnel on the pristine coast. As it is, the bombing at Pohakaloa already disturbs residents of Puako, Waiki'i and Waimea.

**5. Economic impacts tourism , hotels, small business involved in tourism:** All sorts of business, small and large would be negatively effected by the disturbance that increased military activity along this piece of coastline.

Thank you for your consideration. Please do the best thing you can do for our island and do not expand of military operations on the Kohala Coast.

Mahalo Nui Loa,  
Amanda Rieux  
Waimea

\*Implementation of Alternative 2 would contribute directly to emissions of GHGs from the combustion of fossil fuels. Training activities would generate approximately 3,428 tons (3,110 metric tons) of carbon dioxide equivalent each year, as detailed in Appendix B (Air Quality Calculations). These estimated annual GHG emissions would account for approximately 0.00004 percent of the United States' annual GHG emissions. This limited amount of emissions would not likely contribute to global warming to any discernible extent



## DEPARTMENT OF THE NAVY

COMMANDER  
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JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Annastacia Sequoyah ([s88110@netzero.net](mailto:s88110@netzero.net))

Dear Annastacia Sequoyah:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 6, 2018 comment letter from Anastacia Sequoyah.

Copy to: Hawaii Department of Land and Natural Resources

**From:** s88110@netzero.net  
**Sent:** Thursday, December 6, 2018 11:04 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] RE: Kohala Coast Military Exercises

To Whom it may concern; I do not agree to the exercises proposed for this area of the Big Island. It is heavily occupied by humans and sea creatures. It would be a PR problem for the government if the proposed events occurred. Yours, Anastacia L Sequoyah- Resident of Hawi



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Beth McCormick ([hawaii.beth@icloud.com](mailto:hawaii.beth@icloud.com))

Dear Beth McCormick:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition,



explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 6, 2018 comment letter from Beth McCormick.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Beth McCormick <hawaii.beth@icloud.com>  
**Sent:** Thursday, December 6, 2018 1:55 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Opposition to Military exercises along Kohala Coast

To Whom it May Concern:

I am writing to oppose the planned use of lands along the Kohala Coast on the Big Island for military exercises. I have lived on this island for 45 years, and one of the things that draws so many to this special place is its unspoiled coastline. This aesthetic draw is the mainstay of the environment, the culture, and the tourist economy, all of which which would be disrupted by military exercises. Since the military already has exclusive use of a large area of land on the Big Island at Pohakuloa Training Area, it seems unnecessary to use the coastline for training exercises that might be conducted elsewhere. Please do not burden the residents and visitors with these exercises.

Aloha pumehana,  
Beth McCormick  
[ByOurOwnLights@gmail.com](mailto:ByOurOwnLights@gmail.com)



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Bill Davis ([Bill@messengercorp.com](mailto:Bill@messengercorp.com))

Dear Bill Davis:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition,

explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 9, 2018 comment letter from Bill Davis.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Bill Davis <Bill@messengercorp.com>  
**Sent:** Sunday, December 9, 2018 9:39 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] No military training in Kohala, Big Island

To who it may concern,

We are 100% opposed to the new military training on the Kohala coast. We moved to this coast to get away from the city, noise, and pollution. We enjoy the quiet nature of this coastline and request that you abandon your plans for any and all military training. I represent Puakea Bay Ranch property owners, we are 42 families that completely disagree with any and all training on this sensitive coast line.

Sincerely,

William O. Davis

56-2996 Puakea Bay Drive

Hawi, HI 96719



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
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N45  
April 12, 2021

Bronson Azama ([azamab20@knights.k12.hi.us](mailto:azamab20@knights.k12.hi.us))

Dear Bronson Azama:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Bronson Azama.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Bronson Azama <azamab20@knights.k12.hi.us>  
**Sent:** Monday, December 10, 2018 10:38 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Comments Regarding Proposed Military Exercise Expansion

Dear Project Manager or to whom it may concern,

I have recently read through the Environmental Assessment regarding the expansion of military training grounds across the Hawaiians Islands. In reviewing the assessment I noticed in 3.4.2.1.2 *Submerged Archaeological Resources* there was a reference to many cultural sites in the waters of O'ahu, many of the cultural sites being identified of previous military action. Now I am curious onto why the other cultural resources are not specifically identified, however I have also reviewed the proposed APE (Area of Potential Effects) and am deeply concerned regarding the preservation and conservation of sacred sites located in the shores of O'ahu. I noticed that in the Environmental Assessment, cultural sites were often identified as Fishponds or Loko I'a, and as heiau or temples, I would also like to add that it featured many more modern areas of cultural significance, like the remnants of military action in World War II. This is deeply concerning as from a Native Hawaiian perspective we identify many of our sacred sites and areas of cultural significance as natural land features, and would not like to see these areas disturbed or damaged in anyway. For example, in the proposed training area in the Waimanalo nearshore environment there are sacred natural features which are visible in low tide but become submerged in high tide. The feature in which I am referring to is an area in which for generations families have left Ho'okupu (gifts) to the Akua (god) Kamohoali'i, on a natural rock feature that is visible only in low tide. And I am sure the same goes for other islands regarding natural features of cultural significance, so I would highly suggest reviewing any surveys regarding archaeological and cultural resources prior to making a final decision. I would also recommend getting in touch with cultural organizations for their input on the cultural resources in the APE zones. I would recommend contacting the Koolaupoko Hawaiian Civic Club (KPHCC) in regards to the proposed training areas on Windward/Eastern O'ahu and any other cultural organizations in the local area.

Thank you,

Bronson Azama



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Daniel Walsh ([dnlwalsh@hotmail.com](mailto:dnlwalsh@hotmail.com))

Dear Daniel Walsh:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any



training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

There is no active training operation for the public to see. The trainees learn skills needed to avoid detection. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 9, 2018 comment letter from Daniel Walsh.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Daniel Walsh <dnlwalsh@hotmail.com>  
**Sent:** Sunday, December 9, 2018 8:17 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] North Kohala

Aloha from North Kohala!

As a resident and business owner here in North Kohala I am strongly opposed to increased military operations here in North Kohala. I feel that increased noise and environmental pollution which both have been proven to come hand in hand with your presence would drastically impact our appeal to visitors to the area.

In my business I encounter a large number of groups who hold retreats and workshops in the region due to its tranquil and peaceful environment. Other visitors to the area are drawn to the serene natural environment. This draw would be eliminated by your increased presence here. It is challenging enough economically here so please stay out of North Kohala so that the residents here can have an opportunity to build up our local economy. We are depend on tourism and the money that it pumps into our community.

In addition to negatively impacting our economic climate, I am opposed to your presence here and the pollution you bring to our pristine natural environment. The military has proven itself to be one of the largest polluters in the world.

Please respect the wishes of the people and do not increase your presence here. We the people would prefer that you cease all activities here in the islands.

Mahalo for your time,

Daniel



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Desiree Fukuoka ([fukuokad@hawaii.edu](mailto:fukuokad@hawaii.edu))

Dear Desiree Fukuoka:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a study area.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals.

These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Desiree Fukuoka.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Desiree Fukuoka <fukuokad@hawaii.edu>  
**Sent:** Monday, December 10, 2018 10:27 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Testimony OPPOSING expanding NSO training to include Molokai island

To whom it may concern,

My name is Desiree Fukuoka and I am a resident on the island of Molokai in the State of Hawaii. I'm sending this correspondence to express my extreme opposition to the U.S. Navy Special Forces expanding their training to include areas near and on the island of Molokai, including the nearshore and offshore waters surrounding the island. The training area outlined in the EA Report is approximately one-half of the island's south shore. Molokai doesn't have big box stores and relies heavily on subsistence living, which includes fishing. My family fishes all throughout the entire proposed training area as a means for survival and not for recreational purpose. There is bound to be impact to the reef and other marine life from any water based training and proposal to do so on Molokai which has the largest fringing reef system in the entire state is nonsensical. Add this to the fact that the military has had a history of negligence with clean up, Ilio Point, a former military outpost on island is still considered hazardous and unsafe. Proposed expansion to include military training off of Molokai will negatively impact my island and my community.

I kindly propose that the NO-action alternative be enacted for Molokai island.

Thank you for your time.

Regards,

Desiree Fukuoka



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Elle Phillips ([elle@ellephillips.net](mailto:elle@ellephillips.net))

Dear Elle and Brian Phillips:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any

training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 11, 2018 comment letter from Elle and Brian Phillips.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Elle Phillips <elle@ellephillips.net>  
**Sent:** Tuesday, December 11, 2018 2:17 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Special Ops Training West Hawaii Coast

Aloha,

12/11/2018

My husband Brian and I are property and business owners on the Big Island of Hawaii. We are extremely concerned and dismayed about the possibility of additional military exercises and training along our West Coast. We feel this type of activity is completely inappropriate for the Big Island of Hawaii, it's residents, businesses and eco-system. While we are supporters of the Military and understand the need for training; this is absolutely not the right environment for this type of training activity. We are already experiencing elevated levels of training and noise from the military at PTA. The Coast Line, Coastal Waters and their inhabitants are very fragile and it's already an eco-system suffering it does not need any additional stressors. Residents and tourist alike come to Hawaii for a peaceful lifestyle not to witness mock war games and endure noise pollution from military operations. We would highly encourage the military to look for a more suitable environment, one that is not so fragile or dependent on tourism, for its training exercises.

Mahalo,

Elle & Brian Phillips

PO Box 831

Kamuela, HI 96743



## DEPARTMENT OF THE NAVY

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5000-45E  
N45  
April 12, 2021

Estelle Cruse ([letsgoestelle@yahoo.com](mailto:letsgoestelle@yahoo.com))

Dear Estelle Cruse:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any

training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Estelle Cruse.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Estelle Cruse <letsgoestelle@yahoo.com>  
**Sent:** Monday, December 10, 2018 3:02 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] No to training

I am writing in order to comment on the additional training being asked to use the land in Hawaii by the Navy. You already have tons of land to use for your training. You do not need to use more of the public land. Not only will you be endangering all the animals but you'll be negatively affecting the Environment. Please respect the land and the people and keep your training on the military bases.

Sincerely,  
Estelle Cruse



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Genie Wery ([honokaagw@gmail.com](mailto:honokaagw@gmail.com))

Dear Genie Wery:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The No Action Alternative is described in Section 2.5.1 (No Action Alternative) and training activities and locations are summarized in Table 2-3 (Proposed Training Activity by Alternative and Region). Detailed descriptions of the training activities included in the No Action Alternative are described in Section 2.1.1 (Training Activities). Under the No Action Alternative Naval Special Warfare Command (NSWC) would conduct 110 events/year. Baseline training activities conducted in Hawaii over the past decades would continue at the same level as currently scheduled, with the most current training activities being those approved under event-based Categorical Exclusions, as applicable.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their

presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6 (a)) "direct agencies to make diligent effort to involve the public in preparing and implementing their NEPA procedures", however public meetings are not a requirement for Environmental Assessments. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Genie Wery.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Genie Wery <honokaagw@gmail.com>  
**Sent:** Monday, December 10, 2018 12:13 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] RE: Impacts of Special Ops U.S. Naval Special Warfare Command Training

The following comments pertain to the Figure 1-8: Island of Hawaii Training Study Area reflected in the draft EA:

The No Action Alternative which is a continuation of training activities conducted over past decades is not sufficiently described to enable an evaluation of this alternative and assess the expansion of training from the status quo limited in-water training to expanded in-water training and the addition of land-based training. A description of the No Action Alternative current training to include its locations must be included in the EA.

The draft EA makes the findings that there are no significant impacts on land use or recreation, biological resources, and cultural resources with the implementation of the No Action Alternative. However, there is insufficient information to support these findings.

The draft EA contains findings that there will be no significant impacts on the biological and cultural resources in Alternatives 1 and 2. There are numerous historic sites along this shoreline and protected coastal waters which are not reflected in the draft EA. These findings are not supported by the required consultations which have not been completed to date.

The draft EA finds that there will be no significant impacts on recreational areas under Alternatives 1 and 2. The Figure 1-8 areas are highly used for recreation by residents and the tourist industry which is the main economy along this coastline. The description of the recreational resources is insufficient. The recreational users who will be affected by the proposed training need to be consulted via public meetings.

V/R Genie Wery





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
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5000-45E  
N45  
April 12, 2021

Glen Barfield ([glen@okika.com](mailto:glen@okika.com))

Dear Glen Barfield:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWCC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 12, 2018 comment letter from Glen Barfield.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Glen Barfield <glen@okika.com>  
**Sent:** Wednesday, December 12, 2018 7:53 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] More training in Hawaii

Aloha US Navy,

I am sending this to let you know that it seems unconscionable to me that the Navy is considering the practices and tactics in Hawaiian waters and shores that are war preparation actions.

Hawaii is a STATE OF ALOHA, and peace and reconciliation and natural beauty, and preservation of each. We already have many military installations and exercises that sufficiently challenge that very set of values on these lands, seas and air.

I would ask you kindly to seek other sites outside of these precious islands that will let you meet the needs for preparation and trainings, but will not destroy, harm or otherwise invade and change a precious set of principles and practices of integrative ecosystems that are already fragile and degraded by over use in other ways.

With Aloha, Glen

Glen Barfield

glen@okika.com

Home: 808.968.6139

Mobile: 808.937.1606

P.O. Box 737

Mountain View, HI 96771



## DEPARTMENT OF THE NAVY

COMMANDER  
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JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Jane Sezak ([jsezak@hotmail.com](mailto:jsezak@hotmail.com))

Dear Jane Sezak:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected

and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 11, 2018 comment letter from Jane Sezak.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Jane Sezak <jsezak@hotmail.com>  
**Sent:** Tuesday, December 11, 2018 8:24 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Expanded Navy Training

Aloha,

I disagree with your assessment that expanded Naval training exercises will not impact the environment. PLEASE do not expand training on the Hawaiian Islands. The islands and people will be much safer if the Navy put its resources into protecting and cleaning up the environment rather than more war games.

Thank you for your consideration of my testimony.

Jane Sezak



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Jayson Mizula ([soitgoes1984@gn.apc.org](mailto:soitgoes1984@gn.apc.org))

Dear Jayson Mizula:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

There is no active training operation for the public to see. The trainees learn skills needed to avoid detection. Support staff would be dressed as a member of the public and the support staff would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources, including the Hawaiian monk seal and sea turtles. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the



Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing recycling and disposal programs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 6, 2018 comment letter from Jayson Mizula.

Copy to: Hawaii Department of Land and Natural Resources

**From:** soitgoes1984@gn.apc.org  
**Sent:** Thursday, December 6, 2018 2:29 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] proposed training on Molokai

I oppose the US Navy's proposal to expand training operations to the shore waters of south Molokai. Many people here are aware that the US military is the worst polluter on the planet beyond just your consumption of hundreds of thousands of barrels of oil every single day. You have no business training to kill people in the same place that people go fishing, surfing, & paddling.

If even one single monk seal is inconvenienced, much less displaced, that is one too many. As it is, our monk seals & sea turtles are forced to sunbathe on beaches covered with plastic that washes here from the Pacific Ocean, that washes here from a world of mindless consumption that you train & fight to preserve.

Will you be stewards of the environment here the same way that you were with islands like Kaho'olawe, Bikini Atoll, and Vieques? Will you treat the people of Molokai with the same level of respect you treated the patients of Kalaupapa when you turned part of that small peninsula into the Makanalua bombing range?

When you moved the Pacific fleet here in 1940, you painted a huge target on Oahu. There is still a target on islands other than Molokai and we are not OK with that but we will not roll over and remain silent as you try expanding that target to include this peaceful farming community.

People here know that it was the military running the internment camps in the 1940's which imprisoned some of their neighbors. I hope that none of the survivors of those camps have to see even one Navy seal training when they are looking for whales.

The military has shown zero respect for Kanaka Maoli, for other locals, and for the 'aina. History has taught us that America's interests do not align with Hawaii's. If you try to say that things are different now, we all know you're lying.

As a farmer who takes care of this 'aina every day, I oppose the further desecration of Molokai in any form.

As a human being who respects life, I oppose the missions that you train for no matter how noble you believe them to be. Taking innocent life is the antithesis of aloha.

Jayson R. Mizula  
Ho'olehua



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Joe Carvalho ([joe.carvalho@yahoo.com](mailto:joe.carvalho@yahoo.com))

Dear Joe Carvalho:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Area of Potential Effect (APE) for NHPA Section 106 is synonymous with the project Study Area and has been revised for the Final EA. Training would be conducted in selected coastal nearshore waters and shorelines, and inland locations throughout the State of Hawaii. Only water-based and land-based training is proposed for the Island of Hawaii; no air-based training would occur. The APE is larger than the actual area that would be used for the proposed training due to the application of buffer areas, and would be limited to smaller sites on federal land and on state and private land - the latter of which would have the consent of property owners before training activity occurs. The APE/Study Area for Hawaii Island consists of three separate segments of the western coastline: from north to south, the first segment includes the Kohala coast from Mahukona Bay/Beach Park to Kawaihae Harbor; the second segment is from Kahawai Bay to Puhili Point on the Kona coast; the third segment is from Honokohau Small Boat Harbor to Kahului Bay, also on the Kona coast. Based on coordination and discussion with the National Park Service, the Kaloko-Honokohau National Historical Park and Kealahou Bay have been deleted from the APE/Study Area.

In addition, the Navy has identified a number of historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources, including Traditional Cultural Properties. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail.

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Joe Carvalho.

Copy to: Hawaii Department of Land and Natural Resources

**From:** joe.carvalho@yahoo.com  
**Sent:** Monday, December 10, 2018 1:24 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Naval Training--Mahukona to Kawaihae

Aloha,

I am a Vietnam veteran and look at the Naval Special Ops Training exercises as necessary to protect our country making sure we have a well-trained military ready when they are needed. As the WWII banner stated, "Keep them flying, Remember Pearl Harbor". In addition to the pristine coastline and business concerns mentioned in earlier letters, my concern is that the training area from Mahukona to Kawaihae has numerous cultural sites that will be hard not to affect with any kind of air, land or ocean operations. Our local non-profit, Kohala Lihikai, working with other local non-profits and the National Park Service has been fortunate in acquiring Kaiholena and Pao'o for protection and preservation for the public. These lands are inside the affected training area. With the multiple cultural sites uncovered by archaeological reports along this coast, it would be nearly impossible not to affect any of them, especially training operations at night. For this reason, I do not recommend the naval training from Mahukona to Kawaihae.

Joe Carvalho  
53378 Old Halaula Mill Road  
Kapaau, HI 96755

Kohala Lihikai  
North Kohala

<[http://www.avg.com/email-signature?utm\\_medium=email&utm\\_source=link&utm\\_campaign=sig-email&utm\\_content=webmail](http://www.avg.com/email-signature?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail)> Virus-free. [www.avg.com](http://www.avg.com) <[http://www.avg.com/email-signature?utm\\_medium=email&utm\\_source=link&utm\\_campaign=sig-email&utm\\_content=webmail](http://www.avg.com/email-signature?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail)>



## DEPARTMENT OF THE NAVY

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JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

John Nash ([johntnash@gmail.com](mailto:johntnash@gmail.com))

Dear John Nash:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources, including the Hawaiian monk seal and sea turtles. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from John Nash.

Copy to: Hawaii Department of Land and Natural Resources

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

From: john nash <johntnash@gmail.com>

Sent: Monday, December 10, 2018 3:03 PM

To: j.lemmo@hawaii.gov; Zimmerman, Julie M CIV NAVFAC PAC, EV21

<julie.zimmerman@navy.mil>

Subject: [Non-DoD Source] Hawaii naval special operations training

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I am writing this email as a resident of Molokai. The area being proposed on our island for the training may have a harmful impact on the attempts to revive the endangered monk seal. Not enough is included in the assessment regarding the possible harm that may be done to coral, seal, turtle and other endangered parts of the island set aside for the training. In addition, the area is used by locals for fishing as well and it is not clear what impact the exercises would have on day and night fishing.

John Nash





## DEPARTMENT OF THE NAVY

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5000-45E  
N45  
April 12, 2021

Kaliko Grace ([kaliko\\_grace@yahoo.com](mailto:kaliko_grace@yahoo.com))

Dear Kaliko Grace:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the underwater environment, such as the use of unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Kaliko Grace.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kaliko Grace <kaliko\_grace@yahoo.com>  
**Sent:** Monday, December 10, 2018 9:09 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Navy operations in Kawaihae

Aloha mai,

I have been a resident of Kawaihae for almost 10 years now and understand the military's presence in the area and appreciate their training programs but I am writing today to ask that all tests in the waters off Hawaii island please stop in the best interest of our natural environment, more specifically the ocean life (whales, dolphins, shoreline creatures). I believe that these creatures lives, safety and happiness are the priority here and not military training or underwater sonar tests that harm our dear animals. In my ten years in the area I have witnessed a noted decrease in humpback whale activity. Please do what is pono!

Mahalo nui,

Kaliko Grace  
Resident Kawaihae, Hawai'i



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Karen Ashley ([karen\\_ashley@hotmail.com](mailto:karen_ashley@hotmail.com))

Dear Karen Ashley:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letters have been received and are included in Appendix C (Public Comments and Responses) of the Final EA.

All training activities would be non-invasive in nature and the Navy has no intention or authority to close or restrict access to public beaches. Training activities would not interfere with public use of water areas for aquatic recreation. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 7, 2018 and undated comment letters from Karen Ashley.

Copy to: Hawaii Department of Land and Natural Resources

**From:** karen ashley <karen\_ashley@hotmail.com>  
**Sent:** Friday, December 7, 2018 10:54 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Molokai presence

I have been making shell necklaces and keychains for about fifteen years now. I collect mainly on the west and south shores of Molokai. I have supplied Coast guard with keychains and admiral with necklace. Will I be permitted to collect still?

karen



I have been making shell necklaces for over 15 years from shells I find on the south and west shores of Molokai. I supplied many Coast Guard key chains.  
Will my collection efforts be disrupted by your presence on Molokai?

May the Blessings and Joy  
of this Christmas Season  
be with You  
throughout the Coming Year

Karen Ashley

"For unto you is born this day in the city of  
David a Savior, which is Christ the Lord"  
St. Luke 2:11



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Kevin Houck ([kevin@drinkmorekava.com](mailto:kevin@drinkmorekava.com))

Dear Kevin Houck:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected

and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy prepared the Draft EA to assess the potential environmental impacts of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules section 11-200-12 and 40 Code of Federal Regulations section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the EA; consultations with the USFWS, NMFS, and Hawaii SHPO; coordination with the Hawaii Department of Land and Natural Resources, Coastal Zone Management Program; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under Alternative 2. The proposed training would not significantly impact the quality of the human or natural environment. Correspondence regarding the federal and state consultations is presented in Appendix A (Agency Correspondence) of the Final EA.

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 8, 2018 comment letter from Kevin Houck.

Copy to: Hawaii Department of Land and Natural Resources

**From:** kevin.fantz@gmail.com on behalf of Kevin Houck <kevin@drinkmorekava.com>  
**Sent:** Saturday, December 8, 2018 9:38 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Comments on naval special operations training EA

Aloha,

Thank you for making the EA on naval special operations training available. And I appreciate that the comment period has been extended as this is the first time that many of the folks in west Kauai have been made aware of the proposal. I request that further efforts be made to alert the public to the proposal and additional comment extensions be made.

We are greatly appreciative of the hard work and service of our neighbors and 'ohana at the Pacific Middle Range Facility and are pleased to be a part of the conversation concerning the west Kauai study area. Thank you for talking the time to review my comments.

With regards to the proposed training:

Attempting to expand the training area beyond the walls of the 2300 acres and 7 miles of coastline of the PMRF is completely unacceptable. Furthermore, an expansion would be unlawful. The Hawaii Revised Statutes Chapter 205A Coastal Zone Management, dictates specific protections regarding the public access rights to coastal areas. Training that occurs outside of the Naval Facility has consistently blocked local access to critical cultural, fishing and recreation areas as witnessed by closures to the Kekaha shoreline and Polihale State Park during military operations. Any plans for further encroachment upon the Mana shoreline into the aforementioned areas by the federal government violate the HRS§205A statute and must cease immediately.

Mahalo for listening to the concerns of the local community during this process. We are grateful for the continued discussion between PMRF and west Kauai as we work together to make keep our island beautiful and accessible.

Kevin Houck  
4762 Menehune Rd  
Waimea, HI 96796  
(808)631-9519





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Lynda Wallach ([lyndawallach@gmail.com](mailto:lyndawallach@gmail.com))

Dear Lynda Wallach:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs; consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO); coordination with the Hawaii Department of Land and Natural Resources, Coastal Zone Management Program; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under Alternative 2. The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required. Correspondence regarding the federal and state consultations is presented in Appendix A (Agency Correspondence) of the Final EA.

Under the Preferred Alternative (Alternative 2), training would occur up to 10 events at an individual non-federal training site/year (maximum total of events on all non-federal sites would be 330 events) and up to 265 events of training on Federal property per year (Final EA Table 2-4: Proposed Frequency of Training by alternative). Not all sites within the training study area would be utilized over a 1-year period. All training events would be conducted in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, *Navy Safety and Occupational Health Program Manual* (2011). See Chapter 2, Section 2.6 (Best Management Practices and Standard Operating Procedures).

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities

and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 7, 2018 comment letter from Lynda Wallach.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Lynda Wallach <lyndawallach@gmail.com>  
**Sent:** Friday, December 7, 2018 5:07 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Proposed Military Activity on the Kohala Coast

Aloha,

I live in Kapa'au, one of the communities on the North Kohala Coast that will be affected by the proposed military training exercises. The land and waters of this area are home to migrating whales, dolphins, manta rays, numerous species of fish as well as endangered sea birds, native vegetation and multiple cultural sites. Moreover, the coast is used extensively by residents and tourists who appreciate its unspoiled beauty and clear waters. I cannot conceive of how the activities you propose and the level of noise that would generated would not affect both human and wildlife.

Considering the seriousness of the impacts created by the activities you are proposing, I don't think that an Environmental Assessment adequately answers the concerns of our community and I request that the US Department of Navy conduct a complete EIS that would address the following:

A description of the specific quantity and nature of the exercises proposed for the Kohala Coast.

How will those exercises specifically impact the cultural and recreational sites along the coast.

How many flights are expected along the coast and what are the expected frequency and noise levels associated with those flights.

What would be the specific impact on migrating whales and other species that exist along the coast.

Until these questions are answered adequately with an EIS, I strongly object to the proposed training exercises

Sincerely

Lynda Wallach  
PO Box 1468  
Kapaau, HI 96755



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Maureen Garry ([kohalanewseditor@gmail.com](mailto:kohalanewseditor@gmail.com))

Dear Maureen Garry:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs; consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO); coordination with the Hawaii Department of Land and Natural Resources, Coastal Zone Management Program; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under Alternative 2. The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required. Correspondence regarding the federal and state consultations is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 8, 2018 comment letter from Maureen Garry.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kohala Editor [mailto:kohalanewseditor@gmail.com]  
**Sent:** Saturday, December 08, 2018 3:11 PM  
**To:** Ostrem, Meagan K <Meagan.Ostrem@ManTech.com>  
**Subject:** Proposed Military Operations on the North Kohala Coast

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Aloha Ms. Ostrem,

I am writing to request that a full Environmental Impact Statement be completed for the proposed military training operations on the North Kohala Coast in 2019.

I am the managing editor of the Kohala Mountain News, North Kohala's local newspaper, and as such have a broad perspective on the community and activities in the area.

I believe the proposed operations would significantly impact multiple aspects of life in Kohala, for both people and wildlife, and think more in-depth study is needed.

Mahalo,

Maureen Garry



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Melissa Fuka ([melissa.fuka@gmail.com](mailto:melissa.fuka@gmail.com))

Dear Melissa Fuka:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected

and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 9, 2018 comment letter from Melissa Fuka.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Melissa Fuka <melissa.fuka@gmail.com>  
**Sent:** Sunday, December 9, 2018 2:15 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] NO BOMBING RUNS ON OR NEAR HAWAII'S BIG ISLAND!

Regarding: DRAFT ENVIRONMENTAL ASSESSMENT For NAVAL SPECIAL OPERATIONS TRAINING STATE OF HAWAII NOVEMBER 2018

Please, keep your warmongering confined to someplace you've already destroyed. Leave our whales, dolphins, and coastlines on the Big Island alone. Please stay away.

Sincerely,  
Melissa Fuka

Sent from my iPhone



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Myca Laufenberg ([mycalaufenberg@yahoo.com](mailto:mycalaufenberg@yahoo.com))

Dear Myca Laufenberg:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected

and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 9, 2018 comment letter from Myca Laufenberg.

Copy to: Hawaii Department of Land and Natural Resources

**From:** myca laufenberg <mycalaufenberg@yahoo.com>  
**Sent:** Sunday, December 9, 2018 12:33 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Military Proposal for Kohala

Attention: Project Manager  
To whom it may concern,

Aloha,

My name is Myca Laufenberg and I have been blessed enough to spend my last few years learning and loving the environment on the Kohala Coast. My fiance was born and raised here on the Big Island, he has spent his whole life learning from his Kupuna about the diverse beauties of this land. The Kohala coast is home to so many people including my own ohana, animals and marine life. We spend our days gathering, fishing, and diving for so many of our life necessities that turning any area in the Hawaiian Islands let alone this specific area on the Kohala Coast will have significant negative impacts on the people who live here. Mahukona is the only swimming spot for the Keiki of Kawaihea to Kapaau. I ask with everything in my being please do not take this away from our people.

Not only will our people suffer from the loss of this land and coast line but mostly the animals that live here. From all my experiences of free diving I have never seen so much untouched reefs until I ventured out on the Kohala Coast. Just past Mahukona is the ground where I learned to spear fish, I learned how to become one with the ocean and the life within it. I have dreamed of teaching my own kids to do the same in the waters that their father and myself have learned from. Please help us in the fight to preserve the reefs, fish and aina, not to create more damage to the already suffering sea.

There are already 11 bases with in the Islands, the people of the Big Island ask to please look else where to proceed with this training.

With the most hope,  
Myca Laufenberg



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Robin Rose ([docbinah@gmail.com](mailto:docbinah@gmail.com))

Dear Robin Rose:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources, including the Hawaiian monk seal and sea turtles. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 7, 2018 comment letter from Robin Rose.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Robin Rose <docbinah@gmail.com>  
**Sent:** Friday, December 7, 2018 1:55 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Molokai: From Robin Rose MD

To whom it may concern:

I am writing this letter to strongly oppose the plan to use Molokai for naval exercises - as a retired Family Medicine physician, I would like to present my reasoning.

As a resident of Molokai, I am very aware of the unique nature of this community, one which demands our consideration and care. Unlike the other islands in Hawaii, Molokai is home to what is left of Hawaiian culture - the community "is" the island in a way that does not make sense to outsiders. As decent people, we are obligated to honor and respect the needs of this community as an indigenous, subsistence culture.

The people here depend on the land for survival - hunting and fishing and growing. The disruption proposed is unfair to the people who already struggle to make it. Noise pollution will effect the animals, hunting, and the health of the community. Airplanes release toxins that are negative synergists with other toxins on island - mercury was recently noted, pesticide remnants - we know these things are additive. The cancer rate is too high on this island. So is the kidney disease rate. Again, we are obligated to consider their needs.

The reefs on the south side of the island are considered subsistence fishing areas by the people of the island - there is no reason to disrupt their already - stressed economy - and we know that this will bode poorly. Interruption of the flow of this lifestyle with military presence is a disruption and imposition that will cause stress and exacerbate - intensify, make worse - the illness and mental distress of people who call Molokai home.

Their commitment to family, clan, environment is incredibly admirable. Who would disrupt something that is so classically based - this is one of the remaining intact bastions of Hawaiian life - something to honor not ruin. And ruin it it will. As a 5-year resident of this island, an outsider, I see clearly that there is big trouble being invited at so many levels - there are many better options for the navy - to keep the peace among the native members of our community : let us not disrupt this admirable commujnity, something that I would suggest we go out of our way to support. This is not a community that wants or needs such an invasion of its peace - one that will alter - alter negatively - the respect for the aina, the land, for the family, the extended clan, the ocean, the hunting, with a people empowered in their natural world. Outsiders who are not committed to the community, noise, machinery, destruction of the south coast with activities that are not resonant with the subsistence life - all of this is cruel and unkind - as a family physician I will say that this will end up increasing illness, stress related consequences that doctors like me are going to have to deal with - and families further burdened by intrusive activities like this.

Please cease and desist. Find other places to train your troops.

Thank you.

Robin Rose MD





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Selah Levine ([selahbit@gmail.com](mailto:selahbit@gmail.com))

Dear Selah Levine:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing recycling and disposal programs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 6, 2018 comment letter from Selah Levine.

Copy to: Hawaii Department of Land and Natural Resources

**From:** selah levine <selahbit@gmail.com>  
**Sent:** Thursday, December 6, 2018 8:57 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] U.S. Naval Special Warfare Command to conduct joint special operations training in West Hawaii and elsewhere in the state.

The military needs to clean up the toxic messes all over Hawaii, not expand their training into parks and on the slopes of sacred Maunakea and potentially affecting many plant and animal species along with critical habitat. I strongly disagree with this military training excersises conducted anywhere in hawaii.



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Shaeralee Manosa ([smanosa@gmail.com](mailto:smanosa@gmail.com))

Dear Shaeralee Manosa:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The purple area depicted on the maps in the Draft and Final EAs is a study area. Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. Under the Proposed Action (Alternatives 1 and 2), only diver/swimmer and insertion and extraction training would occur in nearshore water-based training areas of Molokai (Draft and Final EAs Table 2-3: Proposed Training Activity by Alternative and Region).

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

Under the Preferred Alternative (Alternative 2), training would occur up to 10 events/year at an individual non-federal training site/year (maximum total of events on all non-federal sites would be 330 events) and up to 265 events of training on Federal property per year (Draft and Final EAs Table 2-4: Proposed Frequency of Training by Alternative). However, not all sites within the training study area would be utilized over a 1-year period. In addition, there are multiple potential training sites within each of the 10 regional training study areas (Draft and Final EAs Table 2-3: Proposed Training Activity by Alternative and Region). Training events are progressive in nature and would range between 2 and 72

hours depending on the activity. All training events would be conducted in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, *Navy Safety and Occupational Health Program Manual* (2011). See Chapter 2, Section 2.6 (Best Management Practices and Standard Operating Procedures). The Proposed Action would be reevaluated under the NEPA if the scope of the Proposed Action or training activities change.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Shaeralee Manosa.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Shaeralee-Tiare Manosa <smanosa@gmail.com>  
**Sent:** Monday, December 10, 2018 9:22 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Comment re: Environmental Assessment for Naval Special Operations  
**Attachments:** Comment on Naval Environmental Assessment.docx

I am Native Hawaiian and I have family and friends in the military. Native Hawaiians don't just think for themselves like many have assumed since your Environmental Assessment surfaced. What we protect has more to do with survival than many think. Everything we do affects another aspect of Earth's resources and creation. There's only one man who created and controls it and I am not afraid to put his purpose first. Money is nothing.. we will never be trained enough to protect the real problems we face as a whole, but what is training without earth?

Mahalo,  
Shaeralee Manosa

To Whom it may concern;

I am a Native Hawaiian born and raised on the island of Molokai. In hearing about your Environmental Assessment only 10 days before today, the last day to submit comments, I am compelled to oppose your intent to conduct any amount of training on Molokai.

It is to my understanding, after only being able to reach half-way through this assessment in such little given transparency, that the following is being proposed for Molokai:

- Diver/Swimmer Training and Insertion/Extraction Training(Table 2-3: Proposed Training Activity by Alternative and Region (continued) Page 2-34
- No Land-Based or Air-Based Training are included
- Alternative 1 will mean that there will only be a maximum of 6 (24 hour events) conducted in a year
- Alternative 2 will mean that there will only be a maximum of 10 (24 hour events) conducted in a year.
- The land area marked on the map states that the location being proposed on Molokai will run from La'au Point to Kalama'ula

Here are my issues with this Environmental Assessment:

- While Table 2-3: Proposed Training Activity by Alternative and Region, states that it will only conduct Diver/Swimmer Training, and Insertion/Extraction Training, it fails to note next to "Launch/Recovery" on page 2-36 that it does not include Molokai.
- Under both Alternative 1 and 2, it states the amount of Maximum Events on Non-Federal Properties are either 6 or 10 events being proposed per area, depending on the Alternative. However, it then continues that it will not exceed more than 198 events on Non-Federal Property for Alternative 1 and that it will not exceed more than 330 events on Non-Federal Property for Alternative 2. 7 areas multiplied by 6 equals 42 events for Alternative1, and 70 events for Alternative 2. This part is deceiving. (Figure 1-2 and Figure 1-9)
- The area marked for use on Molokai include Kalama'ula to Pala'au, which does not have 20-30 feet deep water near shore. It should not be included in the proposed area because this area has food resources, sea creatures, and our longest fringed reef that were not mentioned in your Assessment. The area you have marked needs to be corrected.

More issues with this Environmental Assessment that needs to be noticed, that are may or may not include Molokai:

- Key Documents include information from outdated sources that were conducted more than a year ago. Information has changed with the influx of Native Hawaiians sharing their knowledge and with new studies being conducted due to Climate and Environmental changes

- Each island and each location has its own characteristics, resources, and issues that it faces. Each location should be assessed individually and noted individually in this assessment in order to comply with The National Environmental Policy Act's Purpose:

*To declare a national policy which will encourage productive and enjoyable harmony between man and his environment to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality.*

Jurisdiction was also mentioned in this Environmental Assessment, which is very interesting. Native Hawaiians know why Americans continue to oppress us, we understand how important we are to the United States, and yet we still stand up for what we know is right. We understand that we are under "A Strange Form" of Military Occupation.

Climate Change is real. It is not just the effects you create while conducting your "important" training activities. It is happening and it is bigger than the war you train to be ready for. Our Polar Glaciers are melting, causing imbalance and the earth wobbles off by 10 meters in the past decade. The melted ice has transferred into our oceans, shifting the weight off the axis points of the earth. Hot spots are churning, continental shifts are happening, the weather is bipolar, erosion is everywhere, prices are rising with our tides, and the crime rate!???

In Conclusion, I am opposing your Environmental Assessment and its purpose because it is not important to Earth's Survival. I ask you as humans to put your funds into more important issues to everyone's survival and not just your own. Maybe then you'll have all the support you seek.



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
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5000-45E  
N45  
April 12, 2021

Steve Tonkovich ([steve\\_tonkovich@comcast.net](mailto:steve_tonkovich@comcast.net))

Dear Steve Tonkovich:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected

and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

There is no active training operation for the public to see. The trainees learn skills needed to avoid detection. Support staff would be dressed as a member of the public and would only interact with the public if there was a chance the public may unintentionally discover trainees. Support staff would also visit a training site prior to a training event commencing to ensure there is minimal public in the area.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or other public activities within the training study area.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action.



Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing recycling and disposal programs.

The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the ground, or in air, in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 9, 2018 comment letter from Steve Tonkovich.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Steve Tonkovich <steve\_tonkovich@comcast.net>  
**Sent:** Sunday, December 9, 2018 9:39 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Opposition to Naval Special Operations Training Assessment November 2018 - Kohala Coast, Hawaii

I am writing as a concerned property owner on the Big Island regarding the Proposed Military Exercises that are planned on the Kohala Coast in 2019.

To state my position upfront, I adamantly opposed to this activity based on the potential adverse economic impact, disruption to residential and tourist enjoyment of the island, unintended environmental damage and wildfire risk.

#### Economic Impact

The Big Island has endured significant and material tourism declines in 2018 as vacationers were frightened away by the news reports of volcanic activity, images of houses and cars swallowed by lava, airborne acid haze clouds and reports of volcanic fog (VOG). The Big Island does not need another hit to tourism with reports of military exercise along the coastline where vacationers play. The argument that the exercises are not near the vacation resorts is not valid. The volcano is about a hundred miles from the resorts and posed no realistic threat, yet reservations were canceled by the hundreds. I split my time between my home in Kohala by the Sea north of Kawaihae and my off island home near Philadelphia. I saw firsthand the misinformation that vacationers from the east coast believed as they canceled their Hawaii plans. My concern is for the merchants and tour operators, not my personal financial interests. I own my home and do not rent or lease my property.

#### Residential and Tourist Enjoyment

The culture of the islands is based on peaceful enjoyment of the islands, ocean and the environment. Military activities along the Kohala Coast are in direct opposition to the peaceful enjoyment of Hawaii. Understand that I am a supporter of the military with my father having served in WWI and my father-in-law a retired submariner, but military training needs to be conducted in the appropriate environment. The Kohala Coast of the Big Island is the wrong place.

#### Unanticipated Environmental Damage

While the EPA assessment states an acceptable level of environmental impact, there is always the real and material potential for unexpected spills, accidents, damage that increases with the number of participants and frequency of exercises. Once these pristine areas are damaged, they can not be restored.

#### Fire Danger

The Kohala Coastline is a very arid climate at the lower elevations where these activities would be taking place. The fire danger is high for most of the year. This past summer the Big Island saw several major fires and a few years ago a major fire burned just south of Kawaihae. The introduction of multiple groups of people in the training exercises along with vehicles and aircraft dramatically increases the potential for wildfire. I am not questioning the discipline of the troops, but accidents happen in any environment.

#### Culturally Significant Lands and Rock Structures

The area along the Kohala Coast is filled with Hawaiian culturally significant petroglyphs, sacred sites, temples and precontact habitation sites. Military training activities would put these areas in the path of potential damage and destruction. The nature of training activities is to expose trainees to unexpected obstacles and challenges. Training activities could easily damage or violate these sacred grounds.

Please consider these issues when evaluating the Naval Special Operations Training Assessment from November 2018. Thank you.

Steven M. Tonkovich  
59-180 Laninui Drive  
Kamuela, HI 96743



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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5000-45E  
N45  
April 12, 2021

Steve Turner ([kohalasailandsea@gmail.com](mailto:kohalasailandsea@gmail.com))

Dear Steve Turner:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be

short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Steve Turner.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Steve Turner <kohalasailandsea@gmail.com>  
**Sent:** Monday, December 10, 2018 4:28 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Proposed koala coast training

To Whom it may concern,.

I operate sailing charters out of the kawaihae area of the kohala coast big island hawaii.

I oppose any training by any military in this area. This is a sanctuary to humpback whales and home to spinner dolphins, monk seals, native birds and other important marine life.

No good will come out of the Navy training here. Only harm and disruption of this fragile ecosystem.

Please do it somewhere else.

Thank you

Capt. Steve L Turner



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Susan Mitnik ([sumit.52@hotmail.com](mailto:sumit.52@hotmail.com))

Dear Susan Mitnik:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The term “discreet activities” as used in the Executive Summary and Section 1.1 (Introduction) of the Draft EA was intended to imply that the training activities may be conducted as a single independent activity (e.g., only swimmer/diver activity), as opposed to in combination with other activities (e.g., swimmer/diver activity combined with trainees moving over the beach). The sentence has been revised.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees’ skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6 (a)) "direct agencies to make diligent effort to involve the public in preparing and implementing their NEPA procedures", however public meetings are not a requirement for Environmental Assessments. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Susan Mitnik.

Copy to: Hawaii Department of Land and Natural Resources



**From:** susan mitnik <sumit.52@hotmail.com>  
**Sent:** Monday, December 10, 2018 10:33 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Response to Military Exercises Proposed for Kohala Coast

Attention:

Project Manager  
EV21.JZ  
258 Makalapa Drive, Set. 100  
Pearl Harbor, HI  
96860-3134

To Whom It May Concern,

I have lived and worked on the Kohala Coast for 12 years, and have remained here specifically because the coastline has remained untouched and protected from invasive exercises, such as you propose, as well as most commercial activity, development and even building dwellings on private property. This is because a group of dedicated and concerned individuals have pooled their time, expertise and resources to secure most of the land along the coast to protect it from development and encroachment of military use and commercial development. It is extremely important to me and most of the people in the community to keep our community, including the area you have proposed, free from encroachment of these activities.

I propose that there be no changes to land, air and water use in this area, and choose the "No Action Alternative".

I am semi-retired and teach occasionally at Kohala Elementary and presently volunteer at the Wildlife Center in Kapaau. I have also been a volunteer at Kei Kai Ola, Marine Mammal Center and Kohala Watershed Partnership, as well as have participated in Marine Mammal Disentanglement exercises. I am very aware how sensitive native species are and know from communicating with friends on neighbor islands how invasive military exercises can be in an area.

During the last several years, I have noticed a change in the number of Humpback Whales in the area as well as a die-off of the coral. It has been ascertained that this is due to "climate change" and the warming of the oceans. I know in my discussions with experts in the field of Marine Biology, that whale disturbances and beaching of whales and dolphins can also be due to sonar and electromagnetic activity that the military has been using for a number of years. How can loud noises and continuous pulsing of sonar, etc, not harm the sensitive hearing of marine mammals and other sea creatures? They depend on their "hearing" for navigation and when it is damaged, they beach themselves, pure and simple.

Why do you not mention "Humpback Whales", corals and fish in your assessment? What are "discreet exercises" also mentioned??

I also swim in the area and snorkel. I enjoy seeing a healthy and undisturbed reef. I cannot imagine the creature that live there to "not significantly" be disturbed by the exercises and wonder what criteria your assessment is based upon.

Most of the people I know, including myself, would become very distressed at the proposed level of sound disturbance. I have been in the water when military helicopters have flown low over the water. Frankly, it is terrifying, to say the least! I cannot imagine the sound disturbance on a regular, elevated basis.

I have explored and hiked most of the area proposed, and have enjoyed the quite solitude provided. There are many Indigenous cultural and historical structures in the area, including several important heiaus and villages, including Lapakahi. These are very sensitive areas and extremely important to the Hawaiian people, Ruins are to be found up and down most of the coast. Please don't come here and severely impact our area with your invasive military exercises! For the most part, we are peace loving people and do not expect an invasion on our soil. You would be the only invasion we have to face and we will do everything possible to stop it from happening.

Mahalo Nui Loa for allowing me to comment on this important decision. Please consider having a community forum before making a decision.

Sincerely,

Susan Mitnik  
Kapaau, Hawaii



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Aisha, Kohala Middle School (return address not provided)

Dear Aisha:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period. Training events are progressive in nature and would range between 2 and 72 hours depending on the activity. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations; the MV-22 Osprey would not be used.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition,

explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 3, 2018 comment letter from Aisha.

Copy to: Hawaii Department of Land and Natural Resources

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December 3, 2018

Dear project manager

Our class has discussed the issue concerning the use of the Kohala coast for military activity. I am greatly against the usage of the Kohala coast for military purposes as it may affect the ecosystem and I hope this letter may change your decision.

If the military uses the Kohala coast it may affect the fish, seals, whales, and other ocean animals in this ecosystem. The military proposal will also affect our beaches which are some of the main attractions in our community. The military crafts may also affect waves, fishing, and other public activities in the area.

Another reason that I am against the military proposal is that many of the aircrafts will be loud and disturbing to the people who live here. For example the Osprey MV-22. This aircraft will be noisy and the events may last from 4-72 hours.

In conclusion I think you should reconsider your decision to use the Kohala coast for military purposes and perhaps do this training elsewhere perhaps somewhere that has already been decimated.

Sincerely,

Aisha



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Alice Shingle ([akshingle@hawaii.rr.com](mailto:akshingle@hawaii.rr.com))

Dear Alice Shingle:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 14, 2018 comment letter from Alice Shingle.

Copy to: Hawaii Department of Land and Natural Resources

**From:** akshingle@hawaii.rr.com  
**Sent:** Friday, December 14, 2018 9:28 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Training off Kohala coast

I would like to recommend that the training exercises not be conducted during whale season(November-April)) so as not to disturb them while they are in Hawaiian waters. There are fewer this year, but they do come very close to the Kohala coastline.

Thank you,  
Alice K. Shingle



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Amillio Heu-Mathieu (63hma@kohalam.k12.hi.us)

Dear Amillio Heu-Mathieu:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

NSWC does not anticipate disruptions to the community, local economy, or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please

refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 14, 2018 comment letter from Amillio Heu-Mathieu.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Amillio Heu-Mathieu <63hma@kohalam.k12.hi.us>  
**Sent:** Friday, December 14, 2018 11:05 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source]

### **The Military proposal**

**Dear Military,**

**I think that you should not practice here in Kohala . I say this because I really like the sea and the animals and I do not want anything to change because I really like how it is and I want to protect my island . So I heard that one of the Hawaiian islands is messed up and I do not want that happening to the island of Hawaii. So I will tell you what are the effects that can happen.**

**So it will affect the island by changing the coastline. It could also change the whales coming closer and they might go farther and this also might happen to sea lions and turtles and dolphins. And I know that people like seeing the whales jumping and dolphins jumping and I do like see it too. I read a article with my class and the teacher said that it could change the way of life and when I heard the I was afraid of that. But it might not do anything but I do not want to take the chance.**

**So in the end I think that the military should go somewhere that is harm and that Hawaii will not get harm.**

**Sincerely a 6th grade student form Kohala Middle School**



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Ava-Grace, Kohala Middle School (return address not provided)

Dear Ava-Grace:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Ava Grace.

Copy to: Hawaii Department of Land and Natural Resources

Dear Project Manager,

I don't think it's a good idea to train the military special forces in Hawaii. I live near where you launch the planes and it's really bad. I understand that the military needs training but I don't think they should do it on a very small island. Having this bombing going on in the ocean will cause problems and kill wildlife. In Hawaii we have lots of very special sealife and coral. It will damage coastlines also. I feel that if we don't change things now we will cause some significant changes in the ocean and coastlines. I think that military can do training somewhere else. This is our place to take our children or grandchildren and if there's nothing left for them than what can we do to prevent this from happening.

I do understand that the military needs practice to get good at what they do but they shouldn't damage things in the process. The military does have a reputation of bombing, shooting, and flying helicopters over people's homes and making a loud ruckus so everyone can hear. They also have a reputation of leaving toxic messes all over Hawaii. I personally think that if they want to practice somewhere else they should at least clean up the mess they made over our Hawaii, our home. The military shouldn't practice only on Hawaii though. Their job is to protect not only Hawaii but everywhere else on the USA. So only bombing on Hawaii is kind of unfair to Hawaii and to its citizens.

Sincerely,

Ava-Grace :)



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Christine K., Kohala Middle School (return address not provided)

Dear Christine K.:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions or bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Air quality is analyzed in Section 3.1 of the Draft and Final EAs and Air Quality Calculations are presented in Appendix B. Transportation vehicles, vessels, aircraft, and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on regional ambient air quality. In addition, the dispersive nature of the proposed activities would prevent pollutants from concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed National Ambient Air Quality Standards. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination. Therefore, no significant impacts on air quality would occur with implementation of Alternative 2 (Preferred Alternative).

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Christine K.

Copy to: Hawaii Department of Land and Natural Resources

Dear Project Manager,

Today I am writing to you because of your new military exercises/proposal for the Kohala coastline. I do NOT think it is a good idea to do this in this area. It could have a serious impact on our environment. This is a issue towards our coastlines and sea animals including whales and seals. And it might even contaminate our air.

The Kohala coastline is already in trouble because of climate change. It should have time to heal instead of getting worse from the military exercises. I understand that the military needs to train to protect our country. But can they go in a different place that has less wildlife to harm.

Sincerely,

Christine K. (a student from Kohala Middle School)



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Cristy Athan, Kohala Middle School (return address not provided)

Dear Cristy Athan:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

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As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Cristy Athan.

Copy to: Hawaii Department of Land and Natural Resources

Dear Project Manager,

I am sending you a packet of letters that my 6th grade students wrote to share their thoughts about the proposed military use of the Kohala Coast for military exercises. My students read articles about the proposal and had some deep and rich discussions about the consequences of using or not using this area for military exercises. While most understood the need for the military to practice, the great majority did not find compelling facts as to why the pristine Kohala Coast was chosen for military use.

This area is home to some precious endangered species and the ecosystem is extremely fragile. The various activities the military has proposed would permanently change the ecosystem and this is a price too high to pay for exercises that could be conducted in areas already used in former times.

Beyond the ecological reasons for not having the military use the Kohala Coast, there are moral reasons as to why this is not a good idea. The military has not been a good steward to the environment in the Hawaiian Islands. The places the military has used in the past such as Kaho'olawe and Pohakuloa have not been fully cleaned up, nor has there been good faith in responding to the concerns of the people in Hawaii.

I submit these letters to you for you to carefully read and understand that the children of this area do not want this for themselves nor their future generations. They should be the ones to decide their future because they live here, not you.

Sincerely,

Cristy Athan



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

David Gibbs ([d.j.gibbs@gmail.com](mailto:d.j.gibbs@gmail.com))

Dear David Gibbs:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 14, 2018 comment letter from David Gibbs.

Copy to: Hawaii Department of Land and Natural Resources

**From:** David Gibbs <d.j.gibbs@gmail.com>  
**Sent:** Friday, December 14, 2018 9:24 AM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] Military exercises on kohala coast, HI

To whom this may concern,

I'm writiting to express my opposition to the proposed military exercises on the North Kohala coast on Hawaii. I am concerned for the impact it will have on the sealife as well as the people who use the coastline for various purposes. Please take these into consideration and find federal lands to do your exercises.

Regards,  
David



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

H.K.M., Kohala Middle School (return address not provided)

Dear H.K.M.:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT FOR NAVAL  
SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from H.K.M.

Copy to: Hawaii Department of Land and Natural Resources

Dear Project Manager,

I'm writing this letter regarding the proposed new expansion of military operations along are Kohala coastline on the Big Island of Hawaii. I think it's not a good idea for the military to be doing these exercises

Me and a lot of other families care about this special area. This is are hale or home and we don't want it to be taken away from us. We want this to still be here not just for us but for generations to come.

This exercise can cause sea creatures to die, or animals to die. Do you really want to continue this till there's no more fish? Or until the last dolphin jumps? Do you really want to harm are Āina? Then we will lose all we have.

Are coast is one of a kind. We all know that its suffering from climate change. So do you really want to harm it more by doing these exercises? The coast already needs time to recover so why harm it more.

Military already bombed Kaho'olawe so are we the next one to get bombed?

Is doing this exercises really worth affecting the lives of innocent people? What if we came to your country and bombed or did exercises there how would you feel? By doing these exercises you're not only affecting are lives your going to be affecting marine life too.

By doing this you would be affecting a lot of people's lives. Like when there watching the sunset do you really want to see guys dropping from helicopters. Do you really want to make so much noise when people are sleeping? No because your going to be affected are lives so much that we might even need to close the beaches and we might not even get to sleep. Is doing this exercise worth affecting people's lives?

Therefore I get it the military needs a place for this exercise. But Kohala isn't the place. Im sorry but you need to find another place because people value Kohala's beauty and we don't want it to go to waste.

Sincerely,  
H.K.M





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

I.S.L., Kohala Middle School (return address not provided)

Dear I.S.L.:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

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Copy to: Hawaii Department of Land and Natural Resources

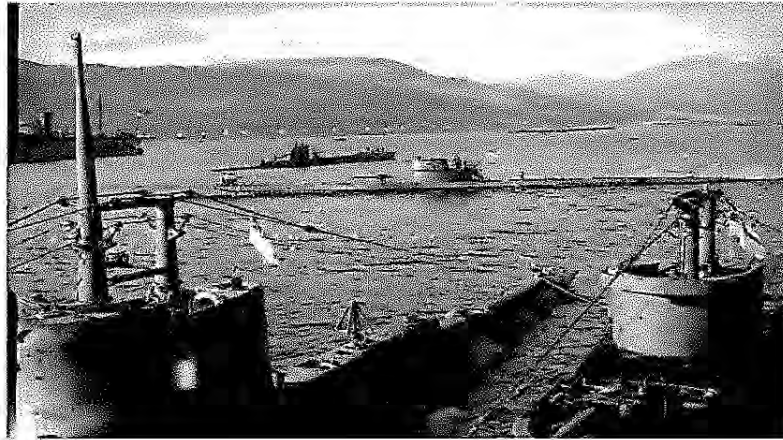
**I.S.L**

**Dear Project manager,**

I am going to be talking about the military exercises. In my opinion I think that the military exercise over here is not a good idea because it can affect the beautiful coast line and lots of other things that shouldn't be harmed like seals and fish. I'm going to tell you more things about what I think.

It is probably going to make lots of noise. It's going to affect people when they sleep and make babies cry. Everyone is going to be angry. People might not be able to fish and that's some people's favorite thing to do and also swim.

So It can't let people swim, hurts things that shouldn't be hurt and it is very loud for people to stand. So what's the point of that. That's why I say no.



**Sincerely,**

**I.S.L**



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Jaden Sandlin, Kohala Middle School (return address not provided)

Dear Jaden Sandlin:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Jaden Sandlin.

Copy to: Hawaii Department of Land and Natural Resources

DEAR: Project manager

Hello my name is Jaden Sandlin and I am 11 years old, and I think you should not do lots of exercises that are harmful to the environment. I care for the environment. If you keep doing all of these harmful things then the animals could die out.

Also I want to go to the beach in peace. With all of the helicopters and plains I can't do that. One second you are chilling at the beach, the next well.  
BRRRRRRRRRRRRRR!!!!!!!!!! WOSH HHHHHH!!!!!!!!!!  
BAAAANG!!!!!!!!!!!!

...yea. That

I don't think that it is a good idea.  
another problem is that The people living near where you are doing the exercises would have a major sound problem. Especially at night I don't live in the areas so I'm fine but the people who do would be mad.

Also I dont see alot of people in my school that agree so please just don't do it. To me its a bad idea to have the military exercises taking place at the Kohala coast

Sincerely: *Jaden Sandlin*



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Jensel Merice Jose ([78jj@kohalam.k12.hi.us](mailto:78jj@kohalam.k12.hi.us))

Dear Jensel Merice Jose:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 14, 2018 comment letter from Jensel Merice Jose.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Jense| Merice Jose <78jj@kohalam.k12.hi.us>  
**Sent:** Friday, December 14, 2018 11:10 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Dear Project Manager

Dear Project Manager,

Today I will be talking about the military wanting to use the big island as a place to do their exercises. And in this letter I will be talking about how the military should not use Kohala for their exercises. I would not like the military to come to the big island to do their exercises. I am saying that the military should not come to the big island because the big island should be a peaceful place, it should be a place where you get to look at the ocean without interruptions, and it should be a place where you get to enjoy the fresh air, while listening to the birds chirping.

Some of the Kohala Middle School students would also not like the military to do their exercises here in Kohala because it would do a big impact on the marine life, and all the other living things. I say this because on the island Kahoolawe the military has bombed it and now no one can live on the island, or at least live on the island with a normal life. And even though Kohala won't be as bad as kahoolawe, it would still be bad because it would change Kohala forever. I say forever because what if, the monk seals don't come back because their to scared, what if the whales don't come back because their homes were disrupted, what if the coral gets ruined and will disrupt the fishes and anything else that lives in the coral, what if the birds don't come back because they bombed the trees then they wouldn't have anywhere to live, what if the humanas get hurt because the tools being used in the training, ect.. Also they should not do training here in Kohala because if something huge happens to Kohala there might not be anymore generations that would be able to live there. And we would like to keep our homes and we wouldn't want something to happen that would affect how we live today in a bad way.

And even though the military has to have a place to do their training, they should not do it here in Kohala. And if they would have to do it on one of the Hawaii Islands, they could do it on Kahoolawe so that another island would not have to be ruined. I said they should do it on Kahoolawe because Kahoolawe was already bombed and ruined by the bombs, so then if they were to do training there they would be able to do anything they wanted. I hope that this letter would impact your choice on having the military come to Kohala to do their training.

Sincerely,  
J.M.C.J.

(A student at Kohala Middle School)

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## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Julian Sandlin, Kohala Middle School (return address not provided)

Dear Julian Sandlin:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations; the MV-22 Osprey would not be used.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for

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April 12, 2021

trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Julian Sandlin.

Copy to: Hawaii Department of Land and Natural Resources

Dear Product Manager,

I am writing to you about the military training on the island because in my opinion, this is a bad idea. There are just so many cons that it just outweighs the pros. Yea it would be cool to see someone jumping out of an airplane, but that's not why people go to The Beach, or at least not me. I go to the beach to hang out, relax, and play in the water.

I can just imagine it. My family and I going to the Beach, having fun, splashing each other, looking at all the fish. And then all the sudden this big 'ol Osprey just flying around and hurting our ears. It's just like, come on man! WTH? I feel like I'll be at the beach and then see these army dudes just like shooting each other. I would be so scared and then just realize that it's all fake gunfire.

What about the people? What if someone was doing that weird thing where they take a nap even though they're at the beach. Hey look, that person is peacefully sleeping. Let's do some helicopter training! This is a bad proposal.

Let's get serious. The people here don't want this. All the noise, the terrible things it will do to the environment. Nobody wants this! Kohala is such a peaceful place to live. If you want to do this, do it somewhere else. You are already doing this in other places. Please don't expand that. This makes me so sad that someone would even think to propose to do something like this in what is supposed to be paradise.

Sandlin

Sincerely,  
Julian



## DEPARTMENT OF THE NAVY

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JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Justin Jones, Kohala Middle School (return address not provided)

Dear Justin Jones:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations; the MV-22 Osprey would not be used.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Justin Jones.

Copy to: Hawaii Department of Land and Natural Resources

To: The Project Manager  
By: Justin Jones  
School: Kohala middle  
GRADE: 6TH

I think it is bad to have planes and helicopters/ jets using our coastlines to do training. Even though I like seeing helicopters and planes going over head at the beaches. Though it may seem harmful to all marine animals because things might drop from planes. And that might be plastic which fish think is food and tries to eat them. And if all the fish die, then the other marine animals will die from starvation. Then there would be no more marine animals. In conclusions, this is why I think it is bad for the Kohala costs.



## DEPARTMENT OF THE NAVY

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N45  
April 12, 2021

Kelulia Fernandez, Kohala Middle School (return address not provided)

Dear Kelulia Fernandez:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Keluia Fernandez.

Copy to: Hawaii Department of Land and Natural Resources

*Dear Project Manager*

*As a person that lives in Kohala I don't want our coast to be use for the exercises . I am proud to say I am from Kohala because it is nice and I want to keep it like that for the generations to come.*

*The Kohala Coast is unique, we already see how our coast is suffering the consequences of climate change. It needs time recover and heal instead of further insult by military exercises.*

*That's why in my opinion it is not a good idea to have the military exercises on the Kohala Coast.*

*Sincerely,  
Keliua Fernandez and I attend Kohala Middle School*



## DEPARTMENT OF THE NAVY

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N45  
April 12, 2021

Kirk Kiaha ([kiahakirk@yahoo.com](mailto:kiahakirk@yahoo.com))

Dear Kirk Kiaha:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWCC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 13, 2018 comment letter from Kirk Kiaha.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kirk Kiaha <kiahakirk@yahoo.com>  
**Sent:** Thursday, December 13, 2018 4:04 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Military Training offshore and near Molokai

Aloha,

I am writing on behalf of myself and family which consist of 4 individuals. We were made aware via Facebook of the upcoming plans to use the off/onshore areas near and surrounding the island of Molokai, Maui and Lanai as training grounds for special forces.

As residents of Molokai who have lived here our whole lives, we are expressing that we DO NOT SUPPORT this decision. We are not againsts the military nor are we againsts the military conducting trainings, however, WE ARE AGAINSTs the military conducting trainings on or near the island of Molokai and its surrounding county (county of Maui) We depend on the ocean and coastal areas for daily sustinence and sustainability. Conducting these types of trainings will ruin our ecosystem and the production of marine wildlife and in these surrounding area will not be the same anymore.

We ask that you take your training ops somewhere else. The hawaiian islands and its people have already been impacted enough by the military using its islands for training. If you don't think so, Just look at Kahoolawe as evedince of what could happen as a result of military trainings in Hawaii. We vote NO to training in and near Hawaii and a bigger NO to training in and near molokai, Maui and lanai.

Mahalo,  
Kama

Sent from Yahoo Mail on Android

<[https://go.onelink.me/107872968?pid=InProduct&c=Global\\_Internal\\_YGrowth\\_AndroidEmailSig\\_\\_AndroidUsers&af\\_wl=ym&af\\_sub1=Internal&af\\_sub2=Global\\_YGrowth&af\\_sub3=EmailSignature](https://go.onelink.me/107872968?pid=InProduct&c=Global_Internal_YGrowth_AndroidEmailSig__AndroidUsers&af_wl=ym&af_sub1=Internal&af_sub2=Global_YGrowth&af_sub3=EmailSignature)>



## DEPARTMENT OF THE NAVY

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5000-45E  
N45  
April 12, 2021

Anonymous Students, Kohala Elementary and Middle Schools (return address not provided)

To Whom It May Concern:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating

Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs. The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the



training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

Air quality is analyzed in Section 3.1 of the Draft and Final EAs and Air Quality Calculations are presented in Appendix B. Transportation vehicles, vessels, aircraft, and training equipment associated with proposed training activities would generate emissions; however, the emissions would not result in a significant change from the environmental baseline and would have negligible impacts on regional ambient air quality. In addition, the dispersive nature of the proposed activities would prevent pollutants from concentrating in a single location and would not result in a new major source of emissions that could cause the State of Hawaii to exceed National Ambient Air Quality Standards. The State of Hawaii is designated as being in attainment for all criteria pollutants and therefore does not require a conformity determination. Therefore, no significant impacts on air quality would occur with implementation of Alternative 2 (Preferred Alternative).

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letters from 16 anonymous students from Kohala Elementary and Middle Schools.

Copy to: Hawaii Department of Land and Natural Resources

Dear Project Manager,

I think that the military shouldn't do the exercises because it could possibly ruin our environment. It also can pollute our air and we can all get sick. Our air wouldn't be safe to breathe and that is one main thing that we need on our earth. Also, our coral reefs will die and so our fish will run out of food and they will die too. I would prefer the military to go and do their exercise somewhere else where there is nothing to harm.

Also, we don't want to lose any lives because of the radiation that the bombs can release. The radiation for human are really bad. You can die or get very very sick because there is lots of chemicals and lots of toxic inside of the radiation. That's why I suggest them to go somewhere else so they don't harm anything that we need in life.

In conclusion, I think that they should not do there exercise so that nobody will die or get very sick. I am very serious about this military message because I don't want anyone to get hurt. That's why I prefer to do your exercises somewhere you won't harm anyone and the environment.

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Dear project manager,

I would like to see my future son or daughter look at the beach and swim and have fun. But that can't happen if there's something wrong with Kohala's beaches. If there's something wrong with the beaches and there are probably helicopters and jets flying around and it might disturb people and the animals and it might crack all the windows and windshields.

But I would like to be in the military and I know you guys have to train on stuff like target practise and stuff but the animals need a home too. there the most defenceless so please don't train on the Kohala coastline.

Sincerely

Kohala middle school student

Dear Project Manager,

Today, I'm going to discuss the proposal the military has for Kohala, which I do not agree with. The proposal is saying that the military would be able to do a bunch of different exercises and one of the tests is for a Osprey MV-22's which would be 4-72 hours long, and very loud. Which isn't pleasant to the locals here who have to deal with the noises. It would be bad for the tourists too who try and come here for a nice vacation but instead get a little of that with some loud noises with the stay.

Another reason for the military not to come here is for the marine animals here and the island's delicate coral. Which would be harmed from the exercises the military would be doing. But when you go to the beach here you expect everything to be all nice and relaxing but with the things the military would be doing it would be quite the opposite, and I'm not happy with that and I don't think other people will be happy with it either. These are a few reasons why I think the Big island of Hawaii should not accept the proposal.

Sincerely,  
A Kohala Middle School Student

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Dear Project Manager,

This letter is to address my opinion on the Military Proposal. I do not think this is a good idea to practice on the Kohala coastline for Military exercises. Military operations on this coastline will change the coastline and will further degrade it. This can significantly impact the environment for people and animals. We don't need further degradation on our islands. Military exercises will hurt the environment, making the beach an unviable place for families, especially children. Should we really ruin this for families? Do we require to do Military exercises on the Kohala coastline? The answer is pretty self explanatory, no. Families won't be able to enjoy these beaches if the Military is gonna do exercises on the coastline, ruining the livelihood of families, again, especially children. This can threaten animals, not just humans. Animals would be disturbed if Military exercises are present. Animals could start perishing from Military exercises which can impact the population of endangered species. In conclusion, in my opinion, the Military should not do their Military operations and exercises on the Kohala coastline.

Sincerely,

Kohala Middle School Student

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Dear Project Manager  
11/27/18

Dear project Manager please don't use our Kohala cost for your practice it will hurt our environment and we care about our nature and our animals so please go somewhere else. You would make everybody that goes their sad that they can't see any of our beautiful nature because SOMEONE CAME IN AND MADE A MESS WITH OUR HOME!!!! Please do not practice hear. My friend dared me to say this you are not welcomed here. In conclusion I think the military should not do this.

Sincerely Kohala Elementary School student

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Dear project manager,

I think you should not do this because it will hurt the environment like the sea, land, and the sky. It will disturbed the people and the people that live over there. It can disturb the sea life and the beach. When you will be doing shooting training it will probably think someone is shooting somewhere and they will complain. I would say that it is disturbing and too loud and heart the environment.

I don't like it because it is disturbed the environment and the people. They sould do it in the mainland and not do it on the islands because it going to heart the land.

---

Dear Project Manager, I don't think that the military should do exercises in Hawaii because it could ruin the environment. It could also ruin the air and make the air dirty. This could harm us and our health. I'm glad that the military is training to keep us safe but I don't appreciate them doing it here. I want the environment safe and clean for the next generation and many more to come. I hope there will still be animals when my future grandkids are alive. If the military does exercises here there may not be any animals because of the bad air quality or the dirty water from the boats coming in and out of our beaches.

Everyday I am grateful to be living in Hawaii, and I dont want loud ships and planes ruining the peaceful enviorment.

# Military exercises

Dear project manager,

I think it's a bad idea to hold military exercises on the Kohala coast because we need to keep this place clean and beautiful. We need to keep this place beautiful because this is the only place that has wildlife and nice beaches. I would not want them to be on the beach when we are swimming. There is a lot of places in the world and you guys choose a nice clean place.

And we don't want our homes to get destroyed and we don't

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Dear Project Manager,

I don't like that you will make Kohala a military place. We want to see the Ocean but if you invade all we will see is planes and dust. We also need tourism so we get money. We like Kohala the way it is.

I like Kohala you can't ruin our hometown. You can train somewhere else, but not here. We want our Kohala the way it is. If you do this our environment can get bad.

We don't want to listen to helicopters and planes all the time. We want to have a good environment. Why can't you go to another place. Don't hurt our place.

In conclusion we want Kohala a beautiful place.

From,

A student from Kohala Middle School.

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## The Big Island Matters

I am writing this letter to you because I don't want you using are Kohala coastline to do your training or testing

I say you should do your training elsewhere because you could possibly pose a threat to wildlife and the environment. When you test you can also disturb the animals that may live by and the may not want to come back or you could be doing your testing where an animal may live and it will be forced to leave its home.

In conclusion I say do it somewhere else away from are island do in the mainland or not here.

### The Military proposal

Dear Project Manager,

I think that the military should not practice here in Kohala . I say this because I really like the sea and the animals and I do not want anything to change because I really like how it is and I want to protect my island . So I heard that one of the hawaiian islands is messed up and I do not want that happening to the island of Hawaii. So I will tell you what are the effects that can happen.

So it will affect the island by changing the coastline. It could also change the whales coming closer and they might go farther and this also might happen to sea lions and turtles and dolphins. And I know that people like seeing the whales jumping and dolphins jumping and I do like see it too. I read a article with my class and the teacher said that it could change the way of life and when I heard the I was afraid of that. But it might not do anything but I do not want to take the chance.

So in the end I think that the military should go somewhere that is harm and that Hawaii will not get harm.

Sincerely a 6th grade student form Kohala Middle School

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Dear Project Manager,

Hi ! This letter is on my opinion on the military exercises on the kohala coast . I think that it's not a good idea to use the kohala coast as the militaries exercise place because it damages fragile ecosystems . So please do not let the military continue to use the the kohala coast because it will scare away the fish , whales , and seals . The bombings will also affect the cultural heritage . It is not healthy for Hawaii . The exercises disturb and damage ecosystems and that will damage the whole island and the beautiful ocean around the island .

---

Dear Project Manager,

Hello there, Please do not do these exercises here because the wildlife is already suffering climate change. If you do the exercises the people will not like to go to the beach because of all the noises that you guys are making also you have to think of the tourist that go to beaches. Think of the whales and the dolphins there ears are going to hurt their ears.

---

DEAR, PROJECT MANAGER

I THINK THAT IT IS BAD FOR THE ARMY TO TRAIN AT THE KOHALA COAST BECAUSE IT IS BAD FOR THE ENVIRONMENT.

PROS

1. THE ARMY CAN BE BETTER AT DEFENDING OUR NATION.
2. BE BETTER IN WAR.
3. THEY COULD BE BETTER AT KILLING.

CONS

1. IT WOULD HAVE A LOT OF TRAFFIC BY THE HAWAII COAST.
  2. THERE WOULD HAVE A LOT OF NOISE.
  3. A LOT OF PEOPLE WOULD BE IRRITATED.
-

*Dear Project Manager,*

*Hi! This letter is regarding to the Military using The Kohala Coast as the training base. I think it is a bad idea because our environment might get hurt by the military exercises. Many people might get affected by the mess that the military did.*

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Dear Project Manager,

Hi! This letter is regarding to the Military using the Kohala Coast as the training base. I think it is a bad idea because our environment might get hurt by the military exercises. I don't think that this is a good idea because other than our environment needs help, a lot of people could get killed by the military's actions based on the exercises. It also might ruin our coral reef and our beaches.

This may also ruin our land by all the dangerous acts that our military might perform. The locals here also might get hurt because many of our locals here have never seen military actually train at our island.

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## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

K.V.C., Kohala Middle School (return address not provided)

Dear K.V.C.:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal

and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from K.V.C.

Copy to: Hawaii Department of Land and Natural Resources

Dear project Manager,

The military is harming our fragile piece of land.

I am writing this letter because the military is bombing the Kohala Coast on the Big Island Hawaii. The reason I am writing this letter is because the Kohala Coastline is a extremely unique and fragile area. This Coastline is a place to enjoy the sunlight and your kids. It is not only that it is our future too. In the future there will be pollution if you continue this harmful act.

Wouldn't you feel bad for your generations and generations of family. They will be left a portion of land that no one will live in. Their is also creatures in our ocean and doing harmful things to the ocean will destroy the animals and mammals. Aloha Aku No, Aloha Mai No – (*I give my love to you, you give your love to me.*) Please don't hurt our piece of land and animals.

Aloha, K.V.C



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Leon Ibana, Kohala Middle School (return address not provided)

Dear Leon Ibana:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. In addition, proposed training activities on the Island of Hawaii does not include air-based training or aircraft operations.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for

trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Ground transportation support is discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training). Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation. During proposed training activities, no roadways would be blocked and the public would not be prevented from normal travel on local roads.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Leon Ibana.

Copy to: Hawaii Department of Land and Natural Resources

*Daer Project manager*

I think that you guys should not be using the Kohala coast because there are many things that could be affected. So I think that you guys should stay at Pohakuloa because there are many people that could complain to you guys. I also think that you guys should not come here because there will be too much noise and we can't enjoy where we live. You guys may also affect the sea animals there could also be no fish anymore. When you guys were at Pohakuloa everything was fine. There was no complaint at all. That was a perfect place for you guys

Lots of people may not be able to enjoy their vacation here. Some of the roads may be blocked off so that means people may not be able to go where they want to go. So I think that they should not come here because there could be many things that could go wrong. What if they fly over houses and they are armed. Since they are doing things on land they could fly very low and damaged houses or even fly things all around the place. One of the military soldiers could accidentally drop a bomb. There could be many fire hazards.

Our Kohala coast is already damaged we need it to heal and now our coast getting insulted by the military. Our climate could change very easily. We need to keep our Kohala coast for our further generations. The military are going to be flying all over our homes. These planes and other things that they will be using will cause destruction. Our fish and coral could be wiped out all of our sea animals included.

So therefore I disagree that the military should not come here because many things could go wrong. I think that the military should just stay at Pohakuloa because they were doing fine were they were and no one was there to complain about it. So I strongly disagree because many things could happen that is unexpected. Therefore this is why I disagree with the military using Kohala coast

Sincerely, Leon Ibane Kohala middle

✉



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Liana P.R., Kohala Middle School (return address not provided)

Dear Liana P.R.:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal

and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Liana P.R.

Copy to: Hawaii Department of Land and Natural Resources



DEAR PROJECT MANAGER,

I THINK THAT YOU GUYS SHOULD NOT COME TO THE KOHALA COAST TO PRACTICE YOUR MILITARY EXERCISES BECAUSE IT IS GOING TO HURT OUR ENVIRONMENT BY MAKING SEA LIFE COME MORE TOWARDS THE SHORE AND POSSIBLY BEACHING WHALES.

THAT BEING SAID I THINK YOU SHOULD STAY AWAY FROM OUR BEAUTIFUL ENVIRONMENT BEFORE THEY RUIN IT. THANK YOU FOR READING THIS LETTER.

SINCERELY,

LIANA P.R

KOHALA MIDDLE SCHOOL



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Madisyn Godoy, Kohala Middle School (return address not provided)

Dear Madisyn Godoy:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Madisyn Godoy.

Copy to: Department of Land and Natural Resources

Dear , Product Manager,

I think you should not do military exercises because you can disturb people that dont wanna be disturbed. I also think this because this could cause harm to some wildlife and also could hurt or disturb endangered species. This also could cause a risk to people that might not know. It could cause serious damage to our beaches.

Kohala is loved and cared for and doing military exercises could bring Kohala down, mess up what we love. Kohala is a playground to us who live here we love the place we live in military exercises could mess up the place we love and cherish.

The Kohala coast is unique. we already see how are coast is suffering the consequences of climate changes. It needs time to recover instead of further insult by military exercises. Our Kohala coast is loved and cherished and it needs time.

We get it you need a location for military exercises but please leave our Kohala coast alone as the beautiful and loved place it is. Kohala is suffering and military exercises are too much for Kohala to handle.

Sincerely  
Madisyn godoy ,  
A student of Kohala middle school



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Mehealani Pang, Kohala Middle School (return address not provided)

Dear Mehealani Pang:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Mehealani Pang.

Copy to: Hawaii Department of Land and Natural Resources

*Dear Project Manager,*

*Military Exercises Harmful to Kohala Coast*

*I think that the military should not come to Kohala Coast and start to train here because I don't want you guys to harm my beautiful hometown, I also think that you should not come and do your Military exercises because you guys are scaring away the sea life.*

*If you scare away the sea life than there won't be any food for our people to eat because you are scaring away all the fish. These are some reasons why I think that you should not hurt our aina/land.*

**e mālama i ka'āina**

**Take Care the Land**

*Sincerely,  
Mahealani Pang*



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Stella Brooke, Kohala Middle School (return address not provided)

Dear Stella Brooke:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Stella Brooke.

Copy to: Hawaii Department of Land and Natural Resources

Dear Project Manager,

I heard that the military is going to start doing drills on the Big Island. I read two articles about this. One about the pros and one about the cons. Over all, I think that the cons won.

I understand that the military needs to practice, but there are other places you can do that. Places where people don't live. I feel that this will change the way the people who live on the Big Island live. Between the sounds and all the people flying out of the sky, I don't think people will enjoy it. Not only people, animals will be affected too. It's not right to hurt the animals that were here long before us.

We live on such a beautiful island it would be such a shame to destroy it. I hope one day future generations can see it the same way I see it now. Not the military practising there every day. A beautiful place where you can go and have fun.

Sincerely,

Stella Brooke



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Zathan Moniz, Kohala Middle School (return address not provided)

Dear Zathan Moniz:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Zathan Moniz.

Copy to: Hawaii Department of Land and Natural Resources

Dear Project Manager,

I am writing this letter in response to the proposed new expansion of military operations along our Kohala coastline on the Big Island of Hawaii.

I and many other ohana living nearby value our aina and just think its not right to hurt the aina we are living on. Not only is it our aina but it is a fragile ecosystem including many varieties of wild life they also could be hurting if they hurt the sea animals. Should they bomb until there's no wildlife to eat or to survive on.

The Kohala coast is unique, we already see how our coast is getting the consequences of the climate changes it will need a lot of extra time to recover but it won't if the military comes and do their exercises.

Sincerely,  
Zathan Moniz



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Zoe Peleiholani, Kohala Middle School

Dear Zoe Peleiholani:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Zoe Peleiholani.

Copy to: Hawaii Department of Land and Natural Resources

## Military Exercise

Dear Project Manager,

I know that you are planning to use Hawaii's areas to do military exercises but I do not agree. I think that doing military exercises from Kawaihae is **NOT** acceptable because that will do a lot of damage to the ecosystem like your large helicopters they will make a lot of noise and will cause the animals harm. Also I don't get why that you can't just go to another place that you have destroyed or have already caused damage to. Plus if or when they put pollution in the ocean then sea creatures could die. Then the military would only cause more and more damage to the ecosystem.

Next Kohala has already gone threw a lot with the weather issues. If ships and helicopters make so much noises then pets will go crazy and run off then the military will be to blame. Then the people will not want the military do exercises. Plus it would to bad for business then people can't fish caused by the pollution from the military. They would have caused a lot of damage and left the mess for the people to clean up plus the places that they have recently been to have still not have been cleaned up. This is why I would like the military to back off and go somewhere else to do military exercises.

Sincerely,  
Zoe Peleiholani





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Patricia Blair ([patriciablair@msn.com](mailto:patriciablair@msn.com))

Dear Patricia Blair:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal

and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 14, 2018 comment letter from Patricia Blair.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Patricia Blair <patriciablair@msn.com>  
**Sent:** Friday, December 14, 2018 4:11 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] I object to any and all Naval Training exercises in Hawaii for environmental reasons.. Our Islands are sacred and fragile. Clean up your messes please.

Patricia Blair, Kailua  
Sent from my iPad



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Claire Trester ([clairetrester@gmail.com](mailto:clairetrester@gmail.com))

Dear Claire Trester:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. In addition, proposed training activities on the Island of Hawaii does not include air-based training operations and aircraft activities; the MV-22 Osprey would not be used under the Proposed Action.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for

trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on terrestrial and marine biological resources, including the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 18, 2018 comment letter from Claire Trester.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Claire Trester <clairetrester@gmail.com>  
**Sent:** Tuesday, December 18, 2018 5:37 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Kawaihae to Upolu

Aloha

I am commenting on the proposed military activities planned for Kawaihae to Upolu Airport, Big Island. Most of that stretch of coastline is within the National Humpback Whale Sanctuary Waters.

Kohala's coastline is also habitat to the critically endangered Hawaiian Monk Seal. I know of at least 5 monk seal individuals residing in the proposed training nearshore habitat. That can be documented with numerous reported public sightings.

I volunteer at Ke Kai Ola, Hawaiian Monk Seal rehabilitation facility in Kona.

Osprey aircraft buzzing in and out of Upolu Airport is particularly a threat due to the fact it has been home to monk seal # IO5, a 11 year old male. Who has made the tide pools at Upolu Point home. I can document #IO5 lineage back to his mom "Lighthouse Mom" who birthed 8 pups over years on Big Island.

So it's clearly a topic you have not considered: CRITICALLY ENDANGERED HAWAIIAN MONK SEALS.

There approx 1200 remaining individuals. About 1000 individuals are in th NWHI. north west hawaiian Islands.

Approx 200 Hawaiian Monk Seals live in main Hawaiian Islands.

NOAA leads the effort to the recovery of the species, along with a number of stakeholders.

It's time to address this matter.

Claire Trester



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
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5000-45E  
N45  
April 12, 2021

Jane Pinckey ([jppinckn@gmail.com](mailto:jppinckn@gmail.com))

Dear Jane Pinckey:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal

and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 18, 2018 comment letter from Jane Pinckney.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Jane Pinckney <jppinckn@gmail.com>  
**Sent:** Tuesday, December 18, 2018 5:55 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Military Exercises

Hello,

I've been informed about your proposed training taking place from Kawaihae to Upolu Airport on the Big Island of Hawaii. I am a resident of the area and very much opposed to such actions. Not only will it produce noise pollution for the island residents, the sea life, fishing, cultural heritage and coastline will be negatively effected.

Please do not proceed with your military exercises.

Thank you,  
Jane Pinckney



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Judith Eagle ([eaglaw2@gmail.com](mailto:eaglaw2@gmail.com))

Dear Judith Eagle:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for your supportive comment and for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on terrestrial and marine biological resources, including humpback whales. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 21, 2018 comment letter from Judith Eagle.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Judith Eagle <eaglaw2@gmail.com>  
**Sent:** Friday, December 21, 2018 2:28 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Land, Ocean Training

Your efforts to keep us safe are so appreciated.

Special kudos for trying to prevent a negative impact in Hawaii.

With regard to whale migration at this season, you are of course aware that Maui is a place where 60% of the world's whales have contact at this season. Please bear that in mind as you decide how to prevent negative impact.

Again, a tip of the hat with admiration for what you do for security.

Yours truly,  
J. Eagle



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Annette Schmidt ([annettejschmidt@gmail.com](mailto:annettejschmidt@gmail.com))

Dear Annette Schmidt:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with

the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 22, 2018 comment letter from Annette Schmidt.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Annette Schmidt <annettejpschmidt@gmail.com>  
**Sent:** Saturday, December 22, 2018 6:25 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] significant impacts

There is a significant impact of using land and shoreline outside of military lands and on non-federal property for military uses. The public does not want such operations conducted in our public spaces. Please use federal property and military bases for such trainings.

Thank you,

♥Annette Julia Pearson Schmidt

74 Laukahi Street  
Kihei, HI 96753  
925-216-0381

[annettejpschmidt@gmail.com](mailto:annettejpschmidt@gmail.com)

Let love be my legacy...



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Betsy Schusser ([betsyschusser@gmail.com](mailto:betsyschusser@gmail.com))

Dear Betsy Schusser:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for

trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 30, 2018 comment letter from Betsy Schusser.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Betsy Schusser <betsyschusser@gmail.com>  
**Sent:** Sunday, December 30, 2018 9:14 AM  
**To:** NFPAC-Receive  
**Cc:** citydesk@mauinews.com; rozhbaker@gmail.com; TulsiOffice@mail.house.gov  
**Subject:** [Non-DoD Source] No Maui County targets

As a 30 year resident of Maui I strongly recommend no target practice on Maui or in Maui waters. This is where we live, hike, swim, snorkel, and scuba dive. Please don't make us launch a massive public protest to stop this invasive, disruptive, and hazardous operation. Please take your weapons somewhere else far away!  
Thank you. Elizabeth Schusser MD



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
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5000-45E  
N45  
April 12, 2021

Carol Allen ([callen2@twc.com](mailto:callen2@twc.com))

Dear Carol Allen:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 30, 2018 comment letter from Carol Allen.

Copy to: Hawaii Department of Land and Natural Resources

**From:** callen2@twc.com  
**Sent:** Sunday, December 30, 2018 9:00 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] No to Navy practice for war in Kihei, Maui,  
H<https://webmail.roadrunner.com/do/mail/message/compose#>

To whom it may concern, I am opposed to war practice in my front yard. I live in North Kihei across from the beach that I believe is your planned war practice site. This is a highly residential compact community also a vacation spot for many tourists. There must be a better uninhabited spot on the other side of the island for war games. Please consider the citizens. This is very bad PR for the Navy.

Mahalo,

Carol Allen



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Carol French-Jay ([cfrenchjay@gmail.com](mailto:cfrenchjay@gmail.com))

Dear Carol French-Jay:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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N45  
April 12, 2021

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The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 31, 2018 comment letter from Carol French-Jay.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Carol French Jay <cfrenchjay@gmail.com>  
**Sent:** Monday, December 31, 2018 4:59 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Proposed exercises in Whale Season around Maui County

To Whom it may concern, Aloha

As a resident of Maui I was extremely disturbed that the Navy will be doing exercises close to Maui county islands and beaches. I am very disturbed and opposed especially about the use of sonar or shelling in the vicinity of a marine preserve that protects whales, dolphins, and other endangered sealife. Not only do we want to protect these animals but they are a source of tourist revenue in this county. This plan is insane especially in the middle of whale season when the majority of Hawaiian humpback whales are birthing and mating in close proximity to all Maui county islands. When the Navy can perform exercises in a vast area at some distance from the Hawaiian islands, why choose to do something so destructive and disturbing as this plan? The citizens of Hawaii have never been asked or consented to this terrible plan. We hope the Navy will immediately reconsider.

mahalo

Carol French-Jay  
Maui Resident



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Effortless Nonviolence ([envone@yahoo.com](mailto:envone@yahoo.com))

Dear Effortless Nonviolence:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 24, 2018 comment letter from Effortless Nonviolence.

Copy to: Hawaii Department of Land and Natural Resources

5000-45E  
N45  
April 12, 2021

**From:** Effortless Nonviolence <envone@yahoo.com>  
**Sent:** Monday, December 24, 2018 10:55 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Military Special Ops Training Planned for all Hawaii Islands

Sirs,

I am writing to state my opposition to the proposed military special ops training planned for all Hawaii islands.

It is ironic that only Kahoolawe is not scheduled for on land training operations. After all, it has already been bombed and decimated.

The timing is the worst imaginable. Maui Humpback whales come into our warm waters at this time of the year. It is the height of the tourist season. May I respectfully suggest that these operations would be better carried out where the Commander in Chief could witness them, opposite Mar-a-Lago.

Sincerely



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Greg Jay ([jay.greg@gmail.com](mailto:jay.greg@gmail.com))

Dear Greg Jay:

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 31, 2018 comment letter from Greg Jay.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Greg Jay <jay.greg@gmail.com>  
**Sent:** Monday, December 31, 2018 5:04 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] STOP Naval Exercises near Maui during Whale Season

To whom it may concern, Dear Sir/Madam, Aloha

Please reconsider endangering our sea-life including our Humpbacked Whales by your reckless Naval exercises near to Maui county islands and beaches this winter. Either do this at another time of year or further out to sea where it does not effect these precious animals.

Thanks in advance.

Greg Jay  
Pukalani, Maui, Hawaii



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Kaui Trainer ([kauitrainer@gmail.com](mailto:kauitrainer@gmail.com))

Dear Kaui Trainer:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with National Historic Preservation Act (NHPA) Section 106 Implementing Regulations at 36 CFR 800.4(d)(1). The Proposed Action is consistent with Hawaii Revised Statutes Chapter 6E as the Navy has completed NHPA Section 106 consultation with the SHPO and key stakeholders and followed the governing procedures to the maximum extent practicable. The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. The Navy also appreciates your additional comments and discussion during an August 14, 2020 teleconference call with NSWC and EA personnel. The notes from that meeting are included as Enclosure 2. All comments that have been received are included in Appendix C of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosures: 1. December 24, 2018 comment letter from Kaui Trainer.  
2. Meeting notes from August 14, 2020 teleconference call between Kaui Trainer and NSWC and EA personnel.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kau'i Trainer <kauitrainer@gmail.com>  
**Sent:** Monday, December 24, 2018 10:40 AM  
**To:** sam.jlemmo@hawaii.gov; alex.j.roy@hawaii.gov; NFPAC-Receive; Meagan.ostrem@mantech.com  
**Subject:** [Non-DoD Source] Comments Against the plan to expand militarization in Hawai'i - Naval Special Operations Training Hawai'i.

Approving Agency:

Department of Land and Natural Resources, State of Hawai'i  
Samuel Lemmo, Office of Conservation and Coastal Lands Administrator  
Kalanimoku Building, 1151 Punchbowl St, Room 131  
Honolulu, HI 96813  
[sam.jlemmo@hawaii.gov](mailto:sam.jlemmo@hawaii.gov)  
Copy to: [alex.j.roy@hawaii.gov](mailto:alex.j.roy@hawaii.gov)

Applicant:  
U.S. Naval Special Warfare Command  
Julie M. Zimmerman, Senior NEPA Planner (EV21)  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Ste 100  
Pearl Harbor, HI 96860-3134  
[NFPAC-Receive@navy.mil](mailto:NFPAC-Receive@navy.mil)

Consultant:  
ManTech International Corporation  
420 Stevens Ave., Suite 300  
Solana Beach, CA 92075  
Attention: Meagan Ostrem  
[Meagan.ostrem@mantech.com](mailto:Meagan.ostrem@mantech.com)

Submitted via email (Comments due January 7, 2019)

Re: Naval Special Operations Training Hawai'i

Republished HEPA DEA Available online at: <http://oeqc2.doh.hawaii.gov/.../2018-12-08-ST-Republished-DEA...>

NEPA DEA Available online at: <https://www.navfac.navy.mil/.../environmental-assessments-ava...>

HRS Chapter 343 Triggers:  
(1) Propose the use of state or county lands or the use of state or county funds  
(3) Propose any use within a shoreline area

Dear Mr. Lemmo and Ms. Zimmerman,

The Navy is proposing to expand their activities into highly sensitive cultural and ecological resources. I am deeply concerned that the military's activities will have significant adverse impacts on our resources. I strongly feel that the Draft Environmental Assessment (DEA) fails to meet the base standards for a DEA under state and federal law.

I am a member of several local organizations with demonstrated expertise in aspects of historic preservation in Hawai'i. I am seeking immediate inclusion as a consulting party to the aforementioned undertaking and/or any subsequent undertakings related to this activity and/or any future undertakings within the area of potential effect or adjacent properties.

To this end, I would like to be included in all future communication related to the Section 106 process and copies of all past records and communications of the Section 106 to date.

I have very serious concerns that this project violates the National Historic Preservation Act (NHPA) 54 U.S.C. 306108, as amended, and its implementing regulations, 36 C.F.R. Part 800, as amended. I also believe violations of Hawai'i Revised Statutes (HRS) Chapter 6E are being proposed and raise serious objection to the Navy's proposed activities. I believe Chapter 6E applies due to the activities occurring on state lands and the HEPA DEA contains no documentation whatsoever regarding its compliance with HRS Chapter 6E and Act 50 (2000), both of which are required before the environmental assessment can be accepted by the State of Hawai'i.

I am urging the State Department of Land and Natural Resources and U.S. Naval Special Warfare Command to reject the DEA for this project.

Respectfully submitted,  
Kau'i Trainer

**ENCLOSURE 1**

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII  
ENVIRONMENTAL ASSESSMENT (EA)  
STAKEHOLDER MEETING NOTES**

**Date:** Friday, August 14, 2020

**Time:** 1445-1600 (Hawaii time)

**Location:** Teleconference

**ATTENDEES**

| <i>NAME*</i>                                                                 | <i>ORGANIZATION*</i>                                                                        |
|------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
| K. Trainer (KT)                                                              | A practioner and lineal descendant of the areas on the islands of Hawaii, Molokai, and Oahu |
| M. Parrent (MP), PM and Deputy Facilities Director/Environmental Coordinator | Naval Special Warfare Group THREE                                                           |
| J. Bigay (JB), PM and NEPA Planner                                           | NAVFAC Pacific                                                                              |
| C. Rasmussen (CR), Archaeologist                                             | NAVFAC Pacific                                                                              |
| R. Rowland (RR), Assistant Counsel                                           | Navy Region Hawaii                                                                          |
| D. Kawakami-Wong (DKW), Assistant Counsel                                    | NAVFAC Pacific                                                                              |

*Notes: \*NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager.*

**Purpose**

The purpose of the call is to follow-up with Kauai Trainer regarding her December 24, 2018 comment letter on the November 2018 Draft EA for NSO Training in Hawaii. Specifically, we would like to enquire if there are any additional questions or concerns regarding cultural resources.

- **JB:** welcomed everyone to the call and the Navy participants introduced themselves.
- **MP:** Introduced herself and then explained the nature of the proposed training. Goal is to leave no trace of training while it is be conducted or after the trainees have left the area. The activities are similar to the activities currently done in the proposed areas and there will be no digging, no fires, no guns or live fire, no air exercises and a very small footprint. The purple areas in the DEA are the study areas and are larger than where we are proposing to train as:
  - We needed the analysis completed to show where we could possibly train vice showing one spot. Showing one location could give the impression that we were driving the analysis to accommodate this location.
  - It is not possible to limit analysis to let's say on 10 feet of wave action, must enlarge the training area to properly analyze proposed water activities.
  - We cannot say what location exactly until we have consent of the property owner and we cannot receive consent from the property owner until the NEPA/HEPA process is completed.
  - If we should receive consent from the property owner and 2 years into the agreement the property owner decides they can no longer accommodate our training request then the Navy can go back to the purple study area to determine if there is another site that we would utilize. Some flexibility is provided with a larger study area.
  - No use of off dirt roads, no use of hiking trails, mainly water activities, and at one of the three proposed training locations an over the beach exercise proposed. More like over the wharf with approximately 6-12 trainees at a time at this location if access to property is secured. The proposed properties are: Kawaihae Harbor, Honokohau Harbor and Mahukona Beach Park.
- **KT:** Thanked us for meeting with her and the stated that 40% of Hawaiians are homeless, then mentioned the history of bombing Kahoolawe island as a training site, and that under the Hawaiian Kingdom the only treaty the Kingdom had with the US Government was for the use of Pearl Harbor to include the Puuloa area. The US Government was complicit in the overthrow of the Hawaiian

**ENCLOSURE 2**



Kingdom. Made mention of six supersites in the area of Pearl Harbor and how the military does not listen. Kanaloas are in those areas and she has family along the south shore of Molokai as well.

- **MP:** We are proposing to use only two harbors at Molokai, no land-based training, water based only with typically up to 18 swimmers in the water at one time for 2-4-four hours at a time if allowed.
- **KT:** Where were drop zones proposed at and where was live fire proposed at?
- **MP:** Only on Department of Defense (DoD) property or near DoD property were drop zones proposed and they are Waipio and Pearl City Peninsulas, Ford Island, and near Marine Corp Base Hawaii outside of their 500-yard buffer zone. Live fire only at three military locations: Pearl City Peninsula (where trainees would come from the water and go into a shooting facility), Puuloa, and Marine Corp Base Hawaii where trainees would come from the water and go directly into the shooting range.
- **KT:** What about Lualualei? Were we aware of the land swap that had occurred between DHL and the Navy? The Navy secured 1,300 acres of land at Lualualei in exchange for 580 acres at Barbers Point without the consent of the Royal patent and Kuleana landowners.
- **MP:** Yes, we are proposing to utilize Lualualei for landing and drop zone activities. However, with all of the air training activities we will not know what is possible until we receive certificates of authorizations from the FAA. So unable to accurately say exactly where any training will take place at this time.
- **KT:** Which NHOs are you working with? Are you working with royal patent titleholders and Kuleana title holders as well? Did you know that the United Nations said that the US occupation of Hawaii was illegal?
- **CR:** I've done extensive research along the coastline of Hawaii including when I was working for Bishop Museum. I have more than 30 years of experience conducting archeological research in Hawaii. I have been working with Jeff Pantaleo, the cultural resources manager for NAVFAC Hawaii. He works closely with Shad Kane on Oahu, who is with the Oahu Council of Hawaiian Civic Clubs.
- **KT:** Can you put me in contact with both individuals?
- **CR:** Yes.
- **KT:** Concluded consultation with thanking us for meeting with her and we all replied by thanking her for listening to our proposal and explaining her concerns.



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Keshava Chari ([keshavachari@gmail.com](mailto:keshavachari@gmail.com))

Dear Keshava Chari:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for your supportive comment and for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on terrestrial and marine biological resources, including humpback whales. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 31, 2018 comment letter from Keshava Chari.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Keshavachari <keshavachari@gmail.com>  
**Sent:** Monday, December 31, 2018 5:00 PM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] Maui Navy Exercises and endangered Humpbacks

Dear Sirs, Aloha

Please reconsider having Naval exercises near Maui County during Whale season when the endangered Humpbacks are birthing and mating.

mahalo

Keshava Chari  
Maui



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Dashama Gordon ([dashamagordon@gmail.com](mailto:dashamagordon@gmail.com))

Dear Dashama Gordon:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with

the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 22, 2018 comment letter from Dashama Gordon.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Konah Yoga <dashamagordon@gmail.com>  
**Sent:** Saturday, December 22, 2018 10:43 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] No military training and ops off military bases in Hawaii

Aloha

I was notified that you have plans to do special ops and training outside of the military bases in Hawaii and I am against that. I live here. Don't do it. Stay on the military bases.  
Thank you

Have a beautiful day!  
Blessings and love,

Dashama 🙏❤️🌍

[Bit.ly/DashamaMediaKit2018](https://bit.ly/DashamaMediaKit2018)

[Dashama.com](https://dashama.com) - online yoga video membership

[30dayyogachallenge.com](https://30dayyogachallenge.com) - transform your life in 30 days guaranteed

[Pranashama.com](https://pranashama.com) - yoga teacher trainings and retreats in Bali, Costa Rica & World Wide

"We are what we repeatedly do. Excellence then is not an act, but a habit." - Aristotle



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Ku'ulei Cababat ([ktxc24@gmail.com](mailto:ktxc24@gmail.com))

Dear Ku'ulei Cababat:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 30, 2018 comment letter from Ku’ulei Cababat.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Kuulei Cababat <ktxc24@gmail.com>  
**Sent:** Sunday, December 30, 2018 9:21 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] War Practice in Maui County

Aloha,

I am a born and raised resident here on the island of Maui. I would like to say NO to Navy/military warfare practices here in Hawai'i!

I understand that our U.S. militaries would benefit from practice, BUT I believe that it is NOT beneficial if the practice of warfare endangers other humans and wildlife!

One of our islands, Kaho'olawe has already been a bombing site for many, many years. It is sacred and forbidden now.

There are numerous amount of homes, townhouses, condos, hotels, etc. on the shores of Maui. Humans, animals, and wildlife will be deeply affected, and that is something that I don't want to experience. I live in Kihei near the shores with my 9 month old son.

Your target sites will also affect refuges, sanctuaries, and YOUTH CENTERS!

Yes, the U.S. Navy can benefit from practice, but this is not the safest idea.

Please please please, DO NOT use our waters/lands as a bombing/warfare practice site again!

Mahalo from the bottom of our hearts,  
Concerned Maui Residents.

Ku'ulei



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
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5000-45E  
N45  
April 12, 2021

Leah Carr ([2016leahcarr@gmail.com](mailto:2016leahcarr@gmail.com))

Dear Leah Carr:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 21, 2018 comment letter from Leah Carr.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Leah Carr <2016leahcarr@gmail.com>  
**Sent:** Friday, December 21, 2018 6:48 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Please Respond

About the possible training on the West coast of Hawaii-- I just want to know why. Why did you choose Hawaii? Not just the island, but the state as well. There are so many native Hawaiian people who are tired of the government using the land and the sea and stepping over boundaries (physical and social). I don't know how many other people actually emailed you about this, but quality over quantity right!?! This email is to serve as a plea to consider the lives of people living in Hawaii. Choose Florida instead for military training. Choose California. I know it will be extremely hard for whoever reads this to even try to comprehend what I am talking about and why I seem so serious, but there is a lot at stake here. Please have an ounce of empathy and leave Hawaii alone already!



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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5000-45E  
N45  
April 12, 2021

Linda Chandler ([tomatopeople8@gmail.com](mailto:tomatopeople8@gmail.com))

Dear Linda Chandler:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or

explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State of Hawaii regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (Hawaii Administrative Rules section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News, and West Hawaii Today, from November 8 through November 10, 2018, and once in *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019, for a total comment review period of 60 days. The

Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 26, 2018 comment letter from Linda Chandler.

Copy to: Hawaii Department of Land and Natural Resources

**From:** C&L Chandler <tomatopeople8@gmail.com>  
**Sent:** Wednesday, December 26, 2018 12:26 PM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] Proposed military exercises off Maui, Molokai, and other Hawaiian islands

To whom it may concern,

I just read in the online news about the proposed military exercises to include sonar and explosives in the ocean near our islands and on land. The article said that a meeting was held on November 7 at Maui High School to take people's comments. The high school said no such meeting was scheduled through them.

Hawaii is the 50th state, not some atoll in the middle of the Pacific. What was done to Kahoolawe was bad enough. The fact that the military thinks nothing of conducting these exercises in populated areas is quite disturbing. And the continued use of sonar is appalling. Are residents and tourists supposed to stay out of the water? Will you provide advance notice to people when the exercises will occur, or will it be as well announced as the comment period, which was not at all.

Why not go to a less populated area, like an atoll, or Guam, where they already hate you? Do you have nothing better to do than waste resources so you can play war games and blow things up and have a yahoo! moment? And if you think the rationale that we need to train to be ready is going to work, think again. If training is so necessary, do it in a place where damage will be kept at a minimum, not a place where you can go 'hoist a few' after your strenuous day of blowing things up and killing sea life.

Do the pono thing and go somewhere else.

Respectfully yours,

Linda P. Chandler





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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5000-45E  
N45  
April 12, 2021

Mark Albers ([omwao@icloud.com](mailto:omwao@icloud.com))

Dear Mark and Suzanne Albers:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 30, 2018 comment letter from Mark and Suzanne Albers.

Copy to: Hawaii Department of Land and Natural Resources

**From:** mark albers <omwao@icloud.com>  
**Sent:** Sunday, December 30, 2018 8:55 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] do not harm and kill marine life

To the Navy:

Everyone in the Hawaiian islands is saddened and upset that the Navy will be exploding bombs and practicing war games on our land and in our oceans.

We are especially concerned for all the marine life.

Think about the intelligent mammals like the humpback whales and dolphin populations that the underwater bombs will be killing or harming beyond repair. Sound travel at least five times faster and further through water. These mammals use sonar to navigate and communicate.

Underwater bomb blasts will surely destroy them!

Is it true that the Navy knows the harm it will be doing not only to these magnificent creatures but all the sea life, and doesn't care?

It is whale season now here in Maui and there is a sharp decline in humpback whale sightings.

Is the Navy's action part of the reason for this decline? Our oceans are already in critical condition; will the Navy be allowed to add to its demise?

Will there come a day when whales will no longer be migrating to our islands? Or what is left of them?

It is sinful and disgraceful if this bomb testing continues to happen!

NO WAR GAMES in our Hawaiian waters!!

Destroy the sea life off Mar-A-Lago if you must blow up bombs!

Sad in Maui. Suzanne and Mark

Sent from my iPad



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Mary Keller ([islandharpist@comcast.net](mailto:islandharpist@comcast.net))

Dear Mary Keller:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 30, 2018 comment letter from Mary Keller.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Mary L Keller <islandharpist@comcast.net>  
**Sent:** Sunday, December 30, 2018 4:35 PM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] Keep your military exercises out of Hawaiian waters

BOYS WITH TOYS, that's what i always call the military. Please keep your boys and your toys out of Hawaii. We value our ecosystems and our marine creatures and we do not want your presence anywhere in our ocean. Go play with your silly equipment off of Mar-a-Lago, or Texas or somewhere else far from our Pacific waters

Thank you from Mary Keller  
23 Nonohe Place  
Paia, HI 96779.



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Mele Stokesberry ([holamaui@earthlink.net](mailto:holamaui@earthlink.net))

Dear Mele Stokesberry:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 30, 2018 comment letter from Mele Stokesberry.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Mele Stokesberry <holamaui@earthlink.net>  
**Sent:** Sunday, December 30, 2018 9:15 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Opposition to Navy Special Ops training in Maui County and all of Hawaii

I am writing to NFPAC to strongly oppose the Navy's plans for Special Ops training on any of the islands of Hawaii and most especially in the waters and on the lands of the County of Maui. The U.S. Navy has done enough damage to Maui County over the years of bombing of the island of Kaho'olawe, during which activities some errant bombs were even dropped on Maui's shores and near-shore waters, and the supposed clean-up of Kaho'olawe is only partially completed and to a very shallow depth.

Special Ops training is for warfare, for killing. It is inimical to the spirit of aloha which Maui Nui embodies. Unless you are coming here to help people recover from disasters and to restore and protect the environment, stay away, U.S. Navy. You have done enough harm already.

Mele Stokesberry

P. O. Box 880231, Pukalani, HI 96788



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Pamela Miller ([pamiller@blarg.net](mailto:pamiller@blarg.net))

Dear Pamela and Robert Miller:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 27, 2018 comment letter from Pamela and Robert Miller.

Copy to: Hawaii Department of Land and Natural Resources

**From:** pamiller <pamiller@blarg.net>  
**Sent:** Thursday, December 27, 2018 2:01 PM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] Planned Navy Seal Training in inland Hawaiian waters

PLEASE DO NOT ATTEMPT YOUR MANEUVERS OR TRAINING IN OUR FRAGILE INLAND HAWAIIAN ISLAND WATERS. THE WHALES ARE GIVING BIRTH AT THIS TIME.

THIS IS AN ILL-THOUGHT-OUT PLAN AND WILL IRREPAIRABLY DAMAGE OUR WILDLIFE/SEASONAL VISITORS, WHICH SWIM HERE FROM ALASKA WATERS TO GIVE BIRTH IN THE WINTER MONTHS AND RETURN TO ALASKA FOR THE SUMMER MONTHS. WE WISH TO PROTEST.

SINCERELY,

PAMELA AND ROBERT MILLER  
196 EAST WELAKAHAO ROAD  
KIHEI, MAUI, HAWAII 96753  
808 875 8666



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Patricia Rouse ([prrmaui@yahoo.com](mailto:prrmaui@yahoo.com))

Dear Patricia Rouse:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 22, 2018 comment letter from Patricia Rouse.

Copy to: Hawaii Department of Land and Natural Resources

**From:** patricia rouse <prrmaui@yahoo.com>  
**Sent:** Saturday, December 22, 2018 7:43 AM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] combat training war games

PLEASE! NO not here, this is a peaceful state, we vote against war, against more practice for war, against destruction of nature and the ocean how could you not know that.

Hawaiians lived too long with the sad mess you left on the island of Kahoolawe. Oh, sorry, here is money for cleanup.

Go invade and destroy with your practice for war where the war mongers live so they can feel the discomfort in their precious space and labor over cleanup, see for themselves how destruction feels, creatures of the sea destroyed for what reason..... man's inhumanity to man, killing and domination prevailing over negotiations and human intelligence at work? PLEASE NO.

You are intelligent, stop, think! We will resist.

Patricia Rouse, Kihei, Hawaii



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Phaethon Keeney ([honokaapeople@yahoo.com](mailto:honokaapeople@yahoo.com))

Dear Phaethon Keeney:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities (see Table 2-4 of the Final EAs). The activities are similar to those conducted by the general public.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 27, 2018 comment letter from Phaethon Keeney.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Honokaa People's Theatre <honokaapeople@yahoo.com>  
**Sent:** Thursday, December 27, 2018 10:38 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] NO Action! Draft Environmental Assessment for Naval Special Operations Training November 2018

Naval Facilities Engineering Command Pacific

Attention: Project Manager

As a concerned resident of Hawaii Island, I STRONGLY object to the Expanded Naval Special Operations Training as proposed in all alternatives in your November 2018 Draft EA. I implore you to use the Aloha Spirit and take the NO Action alternative. This is a major expansion and normalizing of militarism into our communities, and will have profound effect on our island resources, economy, and way of life. We know you, your family, ours and many others would agree that is the best route forward for Hawaii.

To say that there will be no significant impact to air quality, land use-recreation, biological resources, cultural resources, noise, and public health and safety with 6-10 events per year for each location (with that include water (watercraft, submersibles and small vehicles that can) land (simulated munitions and more) and air based (unmanned aircraft systems (UAS) or manned aircraft with landing zones for parachute/rope suspension) is preposterous. This sort of activity is by definition military-industrial, and to bring that into sensitive natural and cultural ecosystems where our community recreates and connects with nature is unconscionable and will have profound deleterious effect. Subsistence living and cultural practices depend on un-disrupted and functioning ecosystem as a whole, these types of disturbances would be a major blow to the Hawaiian way of life. Endangered Species would be impaired by the occurrence of these types of events, as species adjust and shift range for disruptions of this scale and regularity. There is no way this type of activity will have "no impact."

I also strongly disagree with the statement that the potential impacts on Socioeconomics and Environmental Justice as well as Visual Resources are considered negligible or non-existent. No one wants to reflect on a beautiful sunset in Hawaii with war machines in the view, not local residents, not tourists, no one. This proposal would adversely affect the population demographics, employment, community, and socioeconomic characteristics of our islands forever, as this massive expansion includes so much of our coastlines. Especially here on Hawaii Island, expansion along the quiet and pristine Kohala coastline which I hold so dear, this sort of behavior is unacceptable and must be kept limited as is. Much of Hawaii's coastline is historic, however in the case of North Kohala, the area is full of Historic Properties that would be adversely affected in many ways.

Thank you for listening, we appreciate your help and send our deepest aloha to those affected by war, and hope that we can work towards peace training instead, I'm sure Hawaii would support that, but of course, not in our most important cultural and ecological areas. Thank you so much for helping us steer this canoe with aloha.

Phaethon Keeney  
Honoka'a Hawaii

1



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Renee Riley ([renee.riley@hotmail.com](mailto:renee.riley@hotmail.com))

Dear Renee Riley:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letters have been received and are included in Appendix C (Public Comments and Responses) of the Final EA.

The Draft and Final EAs were prepared using the best available science and include over 240 references with specific citations to scientific studies that provide the basis for the statements and conclusions contained within the document. Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of which agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities (see Table 2-4 of the Final EAs). The activities are similar to those conducted by the general public.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous

training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 26, 2018 and January 2, 2019 comment letters from Renee Riley.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Renee Riley <reeneeariley@hotmail.com>  
**Sent:** Wednesday, December 26, 2018 2:53 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Navy Proposal for War training in Maui County

I say NO to the U.S. Navy practice for war -- above, on, and below our beautiful Maui ocean waters, off shore, near shore, and on land! We live in a very special place of Hawaiian aloha and beauty.

Practice peace. Because of the changing climate and the resulting weather related impacts, the Navy could be sending out forces for training and rescue and rebuilding. Do real missions of search and rescue: people need help in Indonesia, Saipan . . . California needs help now. Flint, Michigan could have all its corroded water pipes replaced. The infrastructure needs in the U.S. are endless. Our military personnel could be learning useful and welcomed skills.

The Navy in its practice for war has a history in Maui County – and it isn't good. The Navy used our eighth largest Hawaiian island, Kaho'olawe, a place sacred to Hawaiians, for target practice. Starting in 1941, Kaho'olawe was transformed into a bombing range with ship-to-shore bombardment and later with American submarines testing torpedoes by firing them at shoreline cliffs. They even simulated the blast effects of nuclear weapons on shipboard weapon systems. Although Kaho'olawe is about six miles from Maui, our island windows shook at the bombing impacts. During the Navy testing and practice, some of the torpedoes missed - and landed on Maui!

Despite decades of protest, the Navy continued the bombings until 1990! The results: a dead island where although over 9 million tons of debris and unexploded ordinances have been removed, no one can live, no one can even visit without getting special permission because it is still too dangerous to be there. I can see Kaho'olawe from my deck, but I've never been able to go there, and because of the bombings, it's not likely I ever will. With this new plan, the Navy will actually be shooting near and on-shore Maui! I say No!

In the current proposed plan, a Navy projected target site on Maui looks close to the Kihei Canoe Club, Maui Canoe Club, the Pinks, the Kihei Youth Center, many homes, townhouses, vacation condos, and the longest uninterrupted white sand beach in our state. Also nearby are Keālia Pond National Wildlife Refuge and the Hawaiian Islands Humpback Whale National Marine Sanctuary (the only U.S. sanctuary dedicated to the protection of humpback whales and their marine environment); the critically endangered hawksbill turtles nest along these beaches. I say NO.

The Navy can do good work, but practicing for peace by protecting the environment and helping those in the world who need help are much better skills to hone and will get positive results rather than practicing war by bombing Maui County waters and land. I say NO.

**From:** Renee Riley <reeneeariley@hotmail.com>  
**Sent:** Wednesday, January 2, 2019 10:11 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] No to training for war on Maui waters and land

Although the Navy said that the public comment period wouldn't be up until January 7, 2019, we know that the decision has already been announced! The Navy will do war training in, on, around the water and on the ground. Maui County is a place of particular beauty and aloha. Besides the destruction the trainings will cause, this early decision reflects my grave concern that we can't trust the Navy. From my front deck, I can see Kaho'olawe, the smallest of the eight main volcanic islands in the Hawaiian Islands. Kaho'olawe is located about seven miles southwest of Maui - and I can see it from my deck. I arrived here in 1985. The Navy used Kaho'olawe for target practice from 1941-1990 - despite decades of protests. Sometimes when the Navy recruits practiced, they missed their target. I remember one bomb landed in the Kihei mudflats - seven miles from its target!! Now the Navy will actually be in and on Maui County islands. Kaho'olawe is still extremely dangerous because of un-exploded bombs. I still can't go to the island I can see from the front of my house! How will the Navy do any better with this new area to harm than it did? I say NO to Navy training in, on, under and on land in Maui County!! Aloha, Renée



## DEPARTMENT OF THE NAVY

COMMANDER  
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JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Suzanne Villeneuve ([oceandauphin@gmail.com](mailto:oceandauphin@gmail.com))

Dear Suzanne Villeneuve:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or

leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 22, 2018 comment letter from Suzanne Villeneuve.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Suzanne Villeneuve <oceandauphin@gmail.com>  
**Sent:** Saturday, December 22, 2018 10:18 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Military special ops training

To whom it may concern,  
I live in Hawi, Kohala, on the north west of the Big Island.  
I go swim at Mahukona every other day and I'm opposing  
the military special ops training.  
This is a massive intrusion into our coastal near shore waters,  
public shorelines and public spaces, which will have lots  
of significant negative impacts.  
Please stop this military madness and let us live in peace.  
Suzanne Villeneuve  
55-422 Ho'ea rd, Hawi  
P.O.Box 744, Kapa'au, Hi 96755





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Terry Lilley ([underwater2web@gmail.com](mailto:underwater2web@gmail.com))

Dear Terry Lilley:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or

leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. In accordance with the Endangered Species Act and Marine Mammal Protection Act, the Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 2, 2019 comment letter from Terry Lilley.

Copy to: Hawaii Department of Land and Natural Resources

**From:** underwater2web <underwater2web@gmail.com>  
**Sent:** Wednesday, January 2, 2019 8:25 AM  
**To:** NFPAC-Receive  
**Cc:** Case, Suzanne D; Rep. Daynette Morikawa; David Henkin; Lanny Sinkin; Les Iczkovitz; allen.tom@noaa.gov; Thierry M Work; Bernardo Vargas Angel; Rasmussen, Coral M CIV NAVFAC PAC, EV; Wampler, David; John Christensen - NOAA Federal; senkouchi@capitol.hawaii.gov; repquinlan@capitol.hawaii.gov; repmizuno@hawaii.gov; Kohola Leo; Surfrider Foundation Kauai Chapter; senatorbschatz@us.gov; senriviere@capitol.hawaii.gov; mariska.weijerman@noaa.gov; DLNR.aquatics@hawaii.gov  
**Subject:** [Non DoD Source] Navy Operation will Violate the US Endangered Species Act and MUST be Stopped  
**Attachments:** Stewart.pdf

Hello,

I am a marine biologist living in Kauai and Oahu and I have over 2,000 hours underwater documenting the damage done to our coral reefs and marine life by the US Navy since 2008.

I have done over 250 underwater documentary movie about Hawaiian marine life that have been viewed by over 2 million people on National Geographic, Youtube, Facebook, Hawaiian TV and printed news, UH students and personnel from NOAA, the USGS, Scripps Institute and international TV shows.

I am also a licensed endangered species expert. I was trained by the USFWS and Craig Potter who wrote the Endangered Species Act in 1972 for the EPA.

I have very good scientific evidence that the underwater use of electric Navy mini submarines, Navy full size submarines and Navy ships discharge stray electrical current into the sea causing our coral reef to corrode. This is called Marine Corrosion. I have developed a time line along the Kauai and Oahu north shore showing the Navy operations and how they coincide with the deadly Black Band Coral Disease, dead whales, dead turtles, dead sharks and other dead marine life.

The Navy discharge of underwater electronics, lasers, plasma energy and other electromagnetic frequencies breaks down the calcium carbonate structure of the coral causing the coral to weaken and become susceptible to disease.

When the Navy uses this equipment along with above water microwave transmissions there is a grounding out of electrical current onto the coral reef of which I have documented underwater. When the corals become weakened then the cyanobacteria infect and consume the coral tissue. This has been referred to as The Black Band Coral Disease. I attached an article done up by a large, very scientific environmental engineering company chemist, explaining this process.

According to the US Endangered Species Act and Marine Mammal protection Act the US Navy MUST do a full EIS and Habitat Conservation Plan BEFORE starting any new Navy operation if that operation has the "likelihood of altering the breeding, feeding, nesting, migration, movements or feeding of any endangered species or their habitat".

I can show that the discharge of Navy electricity into the sea water from the Navy mini submarines, drones, submarines and Navy ships has the likelihood to "Harm" and or "Harass" our protected whales, sea turtles, monk seals, fish, sharks and coral reefs.

The Navy has done extensive studies about the effects of sonar and explosives onto our marine life and they did get a legal Incidental Take Permit to harm marine mammals BUT the Navy has not done the proper study OR received an Incidental Take Permit to "Take" marine mammals or protected sea life by using dangerous electronics in the sea.

In my professional opinion the Navy will be in violation of both the ESA and Marine Mammal Protection Act if they start these new proposed military operations nearshore in Hawaii without doing the needed environmental studies and pursue the needed permits to harm and harass our marine life here in Hawaii.

We all know that the US military has shifted from the use of nuclear weapons to electromagnetic weapons, both above and below water. The Navy also uses electromagnetic surveillance systems above and below the sea. Not one proper study has been done yet to show the impacts of these new high intensity electronics on our protected species and marine environment.

The Navy is trying to use old studies done on sonar to go forward with a whole new type of weapons testing. That is like getting a permit to build a single family house then using that permit to build a shopping center!

Congress approved the US Endangered Species Act and Marine Mammal protection Act just for this reason! The Congressional Intent" was to protect the habitat of rare and endangered species and to do the needed environmental studies BEFORE an "Action" takes place, not afterwards when the damage has been done. I would think that the Navy should want to follow the acts of Congress of which have been upheld in the Supreme Court!

The Navy claims to be "protecting the American way and democracy" so why won't the Navy protect American Law?

Aloha,

Terry

Terry Lilley  
Marine Biologist  
Hanalei, Kauai  
<http://underwater2web.com>  
<https://www.gofundme.com/5urrm4zw>  
All Photographs © 2016 Terry Lilly



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Theodore Stethem ([nova\\_data@yahoo.com](mailto:nova_data@yahoo.com))

Dear Theodore Stethem:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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April 12, 2021

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 1, 2019 comment letter from Theodore Stethem.

Copy to: Hawaii Department of Land and Natural Resources

**From:** nova data <nova\_data@yahoo.com>  
**Sent:** Tuesday, January 1, 2019 9:13 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] No Navy in Maui channel

To whom it may concern:

I worked at NUWC Keyport as an electronics engineer for over 30 years, so I know all about this insane notion to keep attacking Hawaii. NAVAIR exercises off Waikiki is totally insane and somebody at NAVSEA has become unhinged.

I am requesting NSWC and NAVSEA to cease and desist all offensive exercises and training against the Hawaiian islands. If not, I will proceed to file a Fraud, Waste and Abuse complaint with the Inspector General including investigation of the funding for these operations. I will also write to the Democratic Senators of Hawaii to investigate reducing or eliminating any funding for these offensive operations against Hawaii.

I will ask Senator Schatz and Senator Hirono to require the U.S. Navy to conduct all operations outside the 12-mile limit, around each island, except for the west end of Kauai.

There is no need for these types of exercise and training operations against Hawaii. I have been on enough exercise and training operations that I know there is a "country of interest". There are no "countries of interest" in the Pacific except North Korea and the China South Sea. If the intent of the SPECOPS is a surf landing on the Chinese reef islands, then Wake Island is a better simulation for that. North Korea is not a tropical island in the Pacific, and is roughly at the same latitude as the southern Aleutian islands. These Aleutian islands are more representative in-situ simulation environments for a covert surveillance and SEAL landing against North Korea.

Trying to use National Security as a justification of a beach play day for SPECOPS is criminal abuse of power. Not exercising and training in realistic in-situ environments is a waste and actually harmful to National Security, not preparing warfighters for the Real World combat scenarios that would be encountered.

Concerned citizen,  
Theodore Stethem, EE/CS  
Pahoa, HI



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Cheryl Burghardt ([burgharc@gmail.com](mailto:burgharc@gmail.com))

Dear Cheryl Burghardt:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

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As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for



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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 2, 2019 comment letter from Cheryl Burghardt.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Cheryl B <burgharc@gmail.com>  
**Sent:** Wednesday, January 2, 2019 2:16 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Naval Special Operations Training State of Hawai'i Draft Environmental Assessment (Draft EA)

Aloha,

I will keep this short. Our 'ohana is opposed to any kind of additional training on our islands by the Navy or any of the US military. The attempts to make it sound like these new trainings will have little or no impact on our islands or people are misleading. We know that everything the Navy does on our islands has an impact. To date, the Navy has not been a good visitor. There is no reason to think that any of this would change with these trainings.

The word play within the press release does not ease our suspicions of what will really happen. The same arguments for why we should allow continue. "The proposed training is essentially the same types of low-impact near-shore training Sailors have been conducting for decades around the Hawaiian Islands." Just because one has done something for decades does not mean it is right. "NO shooting or explosions. None of the training proposed in the Draft EA involves shooting weapons or detonating explosives. Loaded weapons would be carried by service members only at federal locations en route to approved weapons ranges on military property." What is "military" property, approved weapons ranges? These are the Hawaiian Islands and the Navy is a guest that barged itself in and has stayed. Shall we talk about Red Hill fuel leaks or the misuse of Pearl Harbor?

The forever argument that the Navy needs to train to continue to protect us and our freedoms is way past old. We know that the Navy being here makes us a direct target but does the Navy care? O'ahu is a dying island, soon to be an Atoll so why not just destroy it totally seems to be the attitude of the military, Navy.

In conclusion, again, this 'ohana says no to all new trainings and requests that any future trainings, old trainings be halted. Take them to the corporate headquarters of those oil and other companies which the US so strongly protects. Leave us alone on O'ahu and the Hawaiian Islands.  
C. Burghardt



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
N45  
April 12, 2021

Deborah Siegert ([DebSiegert@aol.com](mailto:DebSiegert@aol.com))

Dear Deborah Siegert:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their

presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing recycling and disposal programs.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. In accordance with the Endangered Species Act and Marine Mammal Protection Act, the Navy has consulted with the USFWS and NMFS for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Deborah Siegert.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Deb <DebSiegert@aol.com>  
**Sent:** Thursday, January 3, 2019 12:21 PM  
**To:** NFPAC-Receive  
**Cc:** debsiegert@aol.com  
**Subject:** [Non-DoD Source] Navy warfare on Maui

Dear Sir or Madam,

I highly oppose the idea of using Maui as a practice sight for naval warfare. I have been a long time resident of Maui County and this idea is very disturbing to many locals. The navy used Kahoolawe for target practice many years ago and it is still riddled with debris from those days. We are still trying to clean up this mess including live bombs. I believe the navy seals can find a better place to do their training. We currently have whales, turtles, seals and other animals and habitats that need to be protected. I believe these actions will only pollute and disturb our natural eco system and reefs. The navy has left a mess on Oahu which includes their reefs, beaches and other training sights. Not to mention Kahoolawe. We have even found ordinances on Maui. Additionally, why not do an environmental impact study? I say, NO, to this idea and practice. Please protect our beautiful paradise and environment and find another location for your training sights.

Sincerely,  
Deborah Siegert  
2476 Umeke Circle  
Kihei, Hawaii 96753  
808-268-0288  
Debsiegert@aol.com

Sent from my iPad



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Eva Roberts ([evaart@earthlink.net](mailto:evaart@earthlink.net))

Dear Eva Roberts:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Eva Roberts.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Eva <evaart@earthlink.net>  
**Sent:** Thursday, January 3, 2019 1:20 PM  
**To:** NFPAC-Receive  
**Cc:** eva roberts  
**Subject:** [Non-DoD Source] Ma'alea Bay

Aloha,

I am writing to voice my extreme horror that you would even think of expanding military training operations in Ma'alea Bay.

This is one of the most ecologically sensitive, stunningly beautiful, and extremely peaceful places on this wonderful earth.

Surely you can choose a more appropriate, isolated area to bring in toxic chemicals, deadly weapons, noise, and stress.

What are we fighting for? Peace and freedom, I would hope.

Please do not destroy the existing peace and freedom, in the hopes of creating more of it. Life does not work that way. We need to appreciate and take care of what we have, in order to create more of what we want.

The end almost never justifies the means. To think that the end justifies the means is false thinking, which will lead to nothing good.

Let's care for the Earth, as it nourishes us. That is true strength.

Malama pono.

Mahalo,  
Eva Roberts





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Dan Deknis ([dandeknis@gmail.com](mailto:dandeknis@gmail.com))

Dear Dan Deknis:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the USFWS, NMFS, and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Dan Deknis.

Copy to: Hawaii Department of Land and Natural Resources

**SUBJECT: Opposition to the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui**

TO: Naval Facilities Engineering Command Pacific, Attention: Project Manager- [NFPAC-Receive@navy.mil](mailto:NFPAC-Receive@navy.mil)

COPIES TO:

1. Malu 'Aina Center for Non-violent Education & Action - [ja@malu-aina.org](mailto:ja@malu-aina.org)
2. US Fish and Wildlife - [Sarah\\_Levy@fws.gov](mailto:Sarah_Levy@fws.gov); [Jason\\_Holm@fws.gov](mailto:Jason_Holm@fws.gov); [Miel\\_Corbett@fws.gov](mailto:Miel_Corbett@fws.gov);  
[Brent\\_Lawrence@fws.gov](mailto:Brent_Lawrence@fws.gov); [Rylan\\_Suehisa@fws.gov](mailto:Rylan_Suehisa@fws.gov); [Rylan\\_Suehisa@fws.gov](mailto:Rylan_Suehisa@fws.gov);  
[Jane\\_Chorazy@fws.gov](mailto:Jane_Chorazy@fws.gov); [Jane\\_Chorazy@fws.gov](mailto:Jane_Chorazy@fws.gov)
3. Sierra Club - [contact@mauisierraclub.org](mailto:contact@mauisierraclub.org); [hawaii.chapter@sierraclub.org](mailto:hawaii.chapter@sierraclub.org)
4. Senator Mazie Hirono - [hawaiioffice@hirono.senate.gov](mailto:hawaiioffice@hirono.senate.gov)
5. Senator Brian Schatz - [casework@schatz.senate.gov](mailto:casework@schatz.senate.gov)
6. Representative Tulsi Gabbard - [TulsiOffice@mail.house.gov](mailto:TulsiOffice@mail.house.gov)
7. Maui News - [opinions@themauinews.com](mailto:opinions@themauinews.com)
8. Maui Now - [editor@mauinow.com](mailto:editor@mauinow.com); [wendy@mauinow.com](mailto:wendy@mauinow.com)
9. Hawaii Free Press - [Editor@hawaiiexpress.com](mailto:Editor@hawaiiexpress.com)

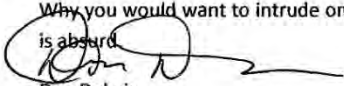
I am writing to strongly oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui. According to the Navy draft assessment (See [Draft Environmental Assessment for Naval Special Operations Training November 2018](#)) the training will include sonar, active explosives, undersea warfare, missile-to-surface, to air, air-to-air missiles, to name a few.

Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Center, Kihei Canoe Club, Maui Canoe Club, the Pink Paddlers - and the longest uninterrupted white sand beach in our whole state - where endangered turtles nest, and the habitat for monk seals and the endangered humpback whales give birth annually, making this a highly environmentally sensitive and high density area.

The U.S. Naval Special Warfare Command (NSWC) made a Finding of No Significant Impacts (FONSI). This finding is a completely inaccurate. The 2<sup>nd</sup> page of the abstract tells us all we need to know. The agency that wrote this is the Department of the Navy, with no cooperating outside agencies what so ever, such as the EPA, Dept of Land and Natural Resources, Dept of Fish and Wildlife etc. which should have been consulted extensively because of the environmental impact to three endangered species.

This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts - cultural, environmental, etc., including the expansion and normalization of militarism in our communities.

The military has miles of uninhabited beaches and lands to conduct their training all over the World. Why you would want to intrude on the public sector and destroy tourism in Hawaii makes no sense and is absurd

  
Dan Deknis  
3105 N Noho Loihi Way Kihei, HI 96753  
[dandeknis@gmail.com](mailto:dandeknis@gmail.com)



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Michael ONeil ([oneoverflowing@gmail.com](mailto:oneoverflowing@gmail.com))

Dear Michael ONeil:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Michael O'Neil.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Max O'Neil <oneoverflowing@gmail.com>  
**Sent:** Thursday, January 3, 2019 8:10 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Active War Practice Ma'alaea Bay, Maui

As a Maui resident I am totally opposed to Active War Practice in Ma'alaea Bay in Maui.

This is an environmentally sensitive area, and a tourist area. Whales come here to birth their babies, the coral is threatened and dying, many fish species are on the decline, seals and monk seals, and green turtles give birth here.

It is not a place for Active War Practices.

Michael O'Neil



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Dhyan Sandhya ([dhyan\\_sandhya@hotmail.com](mailto:dhyan_sandhya@hotmail.com))

Dear Dhyan Sandhya:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Dhyana Sandhya.

Copy to: Hawaii Department of Land and Natural Resources



**From:** dhyan sandhya <dhyan\_sandhya@hotmail.com>  
**Sent:** Thursday, January 3, 2019 11:29 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] letter opposing active warfare training on maui

Jan 3, 2019  
POBox 1293  
Kihei, Hi. 96753

To whom it may concern:

I live in South Maui and I oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on South Maui. The most recent census shows the population of South Maui is over 26,000, the 12th most populated region in the state of Hawaii, not counting part time or visitor populations. Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Centers, Canoe Clubs, private canoes, SUP's, divers, snorkelers and swimmers using our beaches and waters every day. Ma'alaea Bay offers the longest uninterrupted white sand beach in our whole state. Ma'alaea Bay is where endangered turtles nest, endangered monk seals rest and sun themselves, and the endangered humpback whales give birth annually. Plus our ocean reefs are rapidly dying and the beautiful tropical fish are almost gone making Ma'alaea Bay a highly environmentally sensitive area. Is the Sierra Club, Maui Tomorrow, Humpback Whale Sanctuary and Pacific Whale Foundation ok with a plan that could environmentally impact three endangered species? Is the Hawaiian Community really ok with this military plan? And what will this do to tourism? Tourism is Maui's major source of revenue. How long will visitors come if there are navy boats and personnel just off our beautiful beach? This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities. The military has miles of uninhabited beaches and lands to conduct your training all over the World. Why would they want to intrude on the public sector and destroy the delicate eco system and tourism in Maui.

thank you  
d. sandhya



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

David Balfour ([davidbal4@gmail.com](mailto:davidbal4@gmail.com))

Dear David Balfour:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from David Balfour.

Copy to: Hawaii Department of Land and Natural Resources

**From:** david balfour <davidbal4@gmail.com>  
**Sent:** Thursday, January 3, 2019 5:31 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Warfare practice at Ma'alea Bay

My family and I want to register our staunch objection to any military action that endangers whales, dolphins, marine animals or human beings. This is a tourist destination and not a suitable place for military exercises. Respectfully yours,

—  
In peace and friendship,  
David



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Lynne Decosmo ([calpeach99@gmail.com](mailto:calpeach99@gmail.com))

Dear Lynne Decosmo:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Lynne Decosmo.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Lynne Decosmo <calpeach99@gmail.com>  
**Sent:** Thursday, January 3, 2019 3:23 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] NO to Navy Warfare Practice on Maui!

To: Whom It Concerns

As a Maui resident who loves my Island and Beaches I am writing to oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on South Maui. The most recent census shows the population of South Maui is over 26,000, the 12th most populated region in the state of Hawaii, not counting part time or visitor populations. Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Centers, Canoe Clubs, private canoes, SUP's, divers, snorkelers and swimmers using our beaches and waters every day. Ma'alaea Bay offers the longest uninterrupted white sand beach in our whole state. Ma'alaea Bay is where endangered turtles nest, endangered monk seals rest and sun themselves, and the endangered humpback whales give birth annually. Plus our ocean reefs are rapidly dying and the beautiful tropical fish are almost gone making Ma'alaea Bay a highly environmentally sensitive area.

I am NOT okay with this military plan? What will this do to tourism? Tourism is Maui's major source of revenue. How long will visitors come if there are navy boats and personnel just off our beautiful beach? This massive intrusion into our coastal near shore waters, public shorelines and public spaces would have has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities. The military has miles of uninhabited beaches and lands to conduct your training all over the World. Why would you want to intrude on the public sector and destroy the delicate eco system and tourism in Maui?

Please do NOT do your Warfare Practices on Maui!

Mahalo nui loa!  
Lynne Decosmo  
Kihei, HI



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Maree von Sonn ([mareevonsonn@hotmail.com](mailto:mareevonsonn@hotmail.com))

Dear Maree von Sonn:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Maree von Sonn.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Maree von Sonn <mareevonsonn@hotmail.com>  
**Sent:** Thursday, January 3, 2019 8:13 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] I oppose active warfare practice in South Maui waters

I am a Maui resident who loves our Island and Beaches and I oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on South Maui.

The most recent census shows the population of South Maui is over 26,000, the 12th most populated region in the state of Hawaii, not counting part time or visitor populations. Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Centers, Canoe Clubs, private canoes, SUP's, divers, snorkelers and swimmers using our beaches and waters every day. Ma'alaea Bay offers the longest uninterrupted white sand beach in our whole state. Ma'alaea Bay is where endangered turtles nest, endangered monk seals rest and sun themselves, and the endangered humpback whales give birth annually. Plus our ocean reefs are rapidly dying and the beautiful tropical fish are almost gone making Ma'alaea Bay a highly environmentally sensitive area.

Is the Sierra Club, Maui Tomorrow, Humpback Whale Sanctuary and Pacific Whale Foundation ok with a plan that could environmentally impact three endangered species?

Is the Hawaiian Community really ok with this military plan? And what will this do to tourism?

Tourism is Maui's major source of revenue.

How long will visitors come if there are navy boats and personnel just off our beautiful beach? This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities. The military has miles of uninhabited beaches and lands to conduct your training all over the World.

Why would you want to intrude on the public sector and destroy the delicate eco system and tourism in Maui?

It's a horrible and extremely unpopular idea.

Maree von Sonn



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Mike Moran ([mmmmahalo2000@aol.com](mailto:mmmmahalo2000@aol.com))

Dear Mike Moran:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training

activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 4, 2019 comment letter from Mike Moran.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Mike Moran <mimmahalo2000@aol.com>  
**Sent:** Friday, January 4, 2019 8:54 AM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] Opposition to SOT at Maalaea Bay in Maui

To whom it may concern:

I live on Maui Island in Kihei Hawaii, and am expressing my opposition to the current plans to conduct military exercises in Maalaea Bay, which is a large segment of the Hawaiian Islands Humpback Whale National Marine Sanctuary. Why in the world would the Navy select this area using submersibles where mothers give births to calves and nurse them? The humpback population in the region is already decreasing due to a number of factors, so why add one more in this delicate region.

Beyond the whales there is the live coral, also under attack and decreasing, and while seemingly it is claimed there is no intent to make contact, mistakes and errors occur, especially in training exercises.

Of course training is essential to readiness, but is ludicrous to conduct in the fragile region. The obvious choice on the part of the DEA is DO NOT CONDUCT IT IN THIS AREA.

Thank You,

Mike Moran - Kihei, HI



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Rachel Davies ([racheldavies77@gmail.com](mailto:racheldavies77@gmail.com))

Dear Rachel Davies:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training

activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Rachel Davies.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Rachel Davies <racheldavies77@gmail.com>  
**Sent:** Thursday, January 3, 2019 6:51 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Opposition to warfare practice Ma'alaea Bay

Dear sir/madam,

I'm writing to express my strong opposition to the proposed active warfare practice in Ma'alaea Bay. Primarily, I want to support the protection the sea life and endangered species on Maui, including hump back whales, turtles and monk seals, as well as numerous other coral, fish and sea life in the area and the delicate eco-systems there in. Please find other more ecologically and culturally appropriate areas to conduct your practice.

Many thanks  
Kind wishes and aloha,  
Rachel  
Kihei





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Susan Douglas ([sd3@hawaii.rr.com](mailto:sd3@hawaii.rr.com))

Dear Susan Douglas:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or

leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 3, 2019 comment letter from Susan Douglas.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Susan Douglas <sd3@hawaii.rr.com>  
**Sent:** Thursday, January 3, 2019 2:18 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] I Oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui

Warmest Mahalo and Aloha,

Susan Douglas  
84A Iliwai Loop  
(that's spelled I L I W A I)  
Kihei, Maui, HI 96753  
808 879 1112  
[sd3@hawaii.rr.com](mailto:sd3@hawaii.rr.com)

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[Linda Gentiluomo](#)

[Navy plans to expand active warfare practice in Ma'alaea Bay-comment period ends Jan 7!](#)

Oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui Write to oppose today as comments close on January 7, 2019 - Comments opposing this military madness can be submitted by email to [NFPAC-Receive@navy.mil](mailto:NFPAC-Receive@navy.mil) or by mail to Naval Facilities Engineering Command Pacific, Attention: Project Manager, EV21.JZ, 258 Makalapa Drive, Ste 100, Pearl Harbor, HI 96860-3134 Full draft at: [https://www.navfac.navy.mil/content/navfac/en/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information/environmental-assessments-available-for-public-review/jcr\\_content/par1/pdfdownload/file.res/NSO%20HI%20Draft%20EA%20November%202018.pdf](https://www.navfac.navy.mil/content/navfac/en/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information/environmental-assessments-available-for-public-review/jcr_content/par1/pdfdownload/file.res/NSO%20HI%20Draft%20EA%20November%202018.pdf) As Maui residents who love our Island and Beaches please write to oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on South Maui. The most recent census shows the population of South Maui is over 26,000, the 12th most populated region in the state of Hawaii, not counting part time or visitor populations. Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Centers, Canoe Clubs, private canoes, SUP's, divers, snorkelers and swimmers using our beaches and waters every day. Ma'alaea Bay offers the longest uninterrupted white sand beach in our whole state. Ma'alaea Bay is where endangered turtles nest, endangered monk seals rest and sun themselves, and the endangered humpback whales give birth annually. Plus our ocean reefs are rapidly dying and the beautiful tropical fish are almost gone making

Ma'alaea Bay a highly environmentally sensitive area. Is the Sierra Club, Maui Tomorrow, Humpback Whale Sanctuary and Pacific Whale Foundation ok with a plan that could environmentally impact three endangered species? Is the Hawaiian Community really ok with this military plan? And what will this do to tourism? Tourism is Maui's major source of revenue. How long will visitors come if there are navy boats and personnel just off our beautiful beach? This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities. The military has miles of uninhabited beaches and lands to conduct your training all over the World. Why would they want to intrude on the public sector and destroy the delicate eco system and tourism in Maui?



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Mahina Poepoe ([mahinal@hawaii.edu](mailto:mahinal@hawaii.edu))

Dear Mahina Poepoe:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a study area for purposes of analysis and is greater in area than the sites where training activities would occur.

The Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State of Hawaii regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (Hawaii Administrative Rules section 11-200-3). Naval Special Warfare Command (NSWC) published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review November 8, 2018 through December 10, 2018). The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaumualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. Based on the analysis in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs, environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Section 2.1 and Table 2-4 of the Draft and Final EAs).

Overall, the non-invasive nature of the naval special operations training activities (e.g., no live-fire, no construction, no digging, no fires, no human waste) would have minimal effects on the environment because of the short duration, infrequency of occurrence, and low intensity of the proposed training activities. Because the goal of training is for the trainees to be in the field undetected, the environment would be minimally disturbed and materials (e.g., gear and trash) would not be left behind. As analyzed in Chapter 3 of the Draft and Final EAs, no significant impacts would occur with implementation of the Preferred Alternative (Alternative 2).

Training activities would not interfere with public use of land or water areas for subsistence gathering, cultural practices, or recreation. Use of the waters by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land and water use. Training would not restrict subsistence gathering, cultural practices, or recreational activities within the training study area.

Naval Special Warfare Command (NSWC) will also conduct training in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, *Navy Safety and Occupational Health Program Manual* (2011). See Chapter 2, Section 2.6 (Best Management Practices and Standard Operating Procedures). Training activities would be consistent with management objectives of individual sites, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.

As stated in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs, trainees would avoid animals in the water, such as Hawaiian monk seals and sea turtles, and would not approach animals resting on the beach. When in the presence of whales, personnel would shut down boat engines in accordance with boating regulations and Navy procedural instruction. Marine vessels used in training would not bottom out or come ashore in sensitive habitats, such as coral. When training on land, sensitive habitats, such as known bird nesting areas, would be avoided.

The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. In addition, the Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources), and consultation with the Office of National Marine Sanctuaries regarding the Proposed Action and the Hawaiian Islands Humpback Whale National Marine Sanctuary is not required. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including humpback whales or the

Hawaiian monk seal and its critical habitat. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Mahina Poepoe.

Copy to: Hawaii Department of Land and Natural Resources

January 7th 2019

Dear Mr. Lemmo and Ms. Zimmerman,

I am a born and raised Molokai resident. I am opposed to the Navy's proposal to conduct training in the near shore waters off the south coast of Molokai and request Molokai be immediately removed from consideration.

I agree with and support the letter submitted by Aina Momona Executive Director Walter Ritte.

In December of 2018 I published an online form testimony opposing the Navy's proposal to conduct training exercises in the near shore waters of south Molokai. The form testimony received over one thousand five hundred (1,500) submissions that were forwarded to the email address [NFPAC-Receive@navy.mil](mailto:NFPAC-Receive@navy.mil). The Office of Conservation and Coastal Lands (OCCL) and Representative Lynn Decoite were added as recipients a couple of weeks after the initial publishing and would not have received all submissions. If you request it, I am happy to forward each individual email submission to you for your review and records. My contact information is below.

Previous to including Molokai in the EA proposal the Navy and DLNR should have held in person on island meetings to gather feedback from our Molokai community. Had scoping been conducted, it would have found that overwhelmingly our island residents DO NOT support ANY militant activity in our waters. The severe lack of community outreach is not acceptable.

Military training and exercises are a linked cause of harmful and lethal impacts to marine life and mass stranding events. The proposed training area for Molokai is within the Whale Sanctuary. SANCTUARY! The critically endangered Hawaiian Monk Seal also inhabits and frequents the proposed area. The protocol mentioned in the draft EA for encounters with marine mammals is not sufficient to ensure there will be absolutely no harm, ZERO negative impacts, or altering of natural patterns. In order to make sure that the sanctuary and habitat areas are kept a safe refuge, military training cannot occur.

The military has trained on Molokai in the past, leaving behind land that was no longer usable or accessible. Land that to this day is still littered with shells and remnants of explosives. This leaves a high level of mistrust and sets the tone for future proposed trainings like the proposal in this EA. From the proposed map it seems that the military wants freedom and authority to access every island for training. United States military presence in Guam caused Guam to become a nuclear attack target for North Korea. We don't want that foot in our door.

As a result of high cost of living as well as tradition, Molokai residents are very dependent on subsistence gathering to supplement their diets. The area being proposed for training in this EA is proximal to Kaunakakai town and harbor where the islands population is densest meaning that this area specifically has frequent and high ocean traffic by residents for subsistence and cultural purposes. Because of this, The potential for conflict is increased. The thought of subsistence gatherers and cultural practitioners being confronted and turned away from their area of practice because of military training is unacceptable.

The coral reef system within the proposed training area was deemed a national treasure by the USGS. How will our beloved living reef system be impacted? How much damage will be done to the reef from underwater vehicles driving on them? Even though its being said that the proposed training will have "minimal impacts to natural resources" where is that proven? How is "minimal" defined? What amount of life will the training be allowed to "take" from the area? Furthermore, the potential impacts are not only "natural resource" related. There are cultural impacts, impacts to subsistence food sourcing, impacts to lifestyle. Molokai must be protected. Please remove the proposed training area on Molokai from the draft EA.

Respectfully submitted by: Mahina Poepoe, Molokai resident  
PO Box 173, Kualapuu, HI 96757  
[mahinal@hawaii.edu](mailto:mahinal@hawaii.edu)  
(808)658-6010





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Kylie Aurello ([Alison\\_English/HONOKAHI/HIDOE@notes.k12.hi.us](mailto:Alison_English/HONOKAHI/HIDOE@notes.k12.hi.us))

Dear Kylie Aurello:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or

leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Kylie Aurello.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Alison\_English/HONOKAHI/HIDOE@notes.k12.hi.us  
**Sent:** Monday, January 7, 2019 2:50 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Testimony Re: Military Expansion

Aloha,

Everyone knows the importance of training our Army, Air Force, and Marine corps forces, but when they start to expand their training into places that are open to the public, then we worry about the damage that will be inflicted onto our lands. When I was little, I'd always go hunting with my dad in the hunting areas around Mauna Kea. There was this one area that my dad would always take us to hunt, but one day he didn't take us to that spot, but to another place instead. I asked him why we weren't going to our original spot and he told me the other area was closed because of military training. That entire day, while we were hunting, all I could hear were loud explosions as the military practiced bombing.

From that experience, I can only imagine the massive craters that were created in the ground, taking away from our mountains natural beauty. Now with talk of military expanding their trainings towards our beach areas, I worry about the damage that will be inflicted on our coral reefs and beaches. I know they won't be practicing bombings on the beaches, but there are marine animals that could be very affected by the marine practices. There are many possibilities that could take place with the military expanding its territories. They may ruin our coral reefs that are already struggling as it is or they may pollute the oceans, land, and air in the areas they are going to train.

So as a resident of Hawaii, I ask that instead of choosing places that are accessible to the public and have marine species thriving in that area, please look for places that are less inhabited. Do an environmental impact statement before you start and please notify and ensure the public that the training will not harm our beloved island.

Mahalo for your time,  
Kylie Aurello  
45-527 Pakalana St.  
Honokaa, HI, 96727



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Bill and Bobbie Best ([bestb002@hawaii.rr.com](mailto:bestb002@hawaii.rr.com))

Dear Bill and Bobbie Best:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or

leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 5, 2019 comment letter from Bill and Bobbie Best.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Bill or Bobbie Best <bestb002@hawaii.rr.com>  
**Sent:** Saturday, January 5, 2019 12:13 PM  
**To:** NFPAC Receive  
**Subject:** [Non DoD Source] Attn: Project Manager, EV21JZ - We oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui

The most recent census shows the population of South Maui is over 26,000, the 12th most populated region in the state of Hawaii, not counting part time or visitor populations. Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Centers, Canoe Clubs, private canoes, SUP's, divers, snorkelers and swimmers using our beaches and waters every day. Ma'alaea Bay offers the longest uninterrupted white sand beach in our whole state. Ma'alaea Bay is where endangered turtles nest, endangered monk seals rest and sun themselves, and the endangered humpback whales give birth annually. Plus our ocean reefs are rapidly dying and the beautiful tropical fish are almost gone making Ma'alaea Bay a highly environmentally sensitive area. How long will visitors come if there are navy boats and personnel just off our beautiful beach? This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities. The military has miles of uninhabited beaches and lands to conduct your training all over the World. Why would they want to intrude on the public sector and destroy the delicate eco system and tourism in Maui?

We are very concerned and appreciate the opportunity to give this input.

Aloha,  
Bill and Bobbie Best  
280 Hauoli St.  
Wailuku HI 96793



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Carl Bernhardt ([carlbernhardt@msn.com](mailto:carlbernhardt@msn.com))

Dear Carl Bernhardt:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The increased training requirement is in accordance with the Naval Special Warfare Command (NSWC) meeting its Title 10 U.S. Code Section 167 mandate as discussed in Section 1.3 (Purpose of and Need for the Proposed Action) in the Draft and Final EAs. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces. Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The current limited number of sites available to trainees results in repeated use of sites and undue familiarity with the training scenarios, thus limiting the quality of the training. The restricted number of sites are not considered sufficiently varied and diverse to support persistent long-term training requirements. Training must be varied and diverse, and as realistic as possible, to prepare U.S. service members to achieve their mission and ensure their success and survival when deploying on missions. Naval special operations personnel must be ready for a variety of military operations—from large-scale conflict to maritime security and humanitarian assistance/disaster relief—to respond to the dynamic, social, political, economic, and environmental issues that may arise.

There is no time limit or expiration date associated with EAs. The document and analysis remain active until there is a change in the activities that were originally assessed, which would prompt another review. If the change is substantive, then a supplement or new EA may be prepared. For example, a trigger leading to a supplement or new document could be newly listed threatened or endangered species, substantial increases in training frequency, or new training activities.

NSWC conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to

be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Carl Bernhardt.

Copy to: Hawaii Department of Land and Natural Resources



**From:** carl bernhardt <carlbernhardt@msn.com>  
**Sent:** Sunday, January 6, 2019 5:55 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] DEA

The DEA, and even its executive summary, are lengthy documents with abundant content. As is sadly the case with many such documents, some of the language is repeated ad nauseum, while glossing over critical issues or ignoring them entirely. Therefore, the DEA in its present form, falls short. The following comments represent, in broad terms, a few of the areas of concern:

The DEA states the purpose of, but not the need for, the proposed Alternatives 1 and 2. One can assume the Navy is already engaged in the activities proposed, but does not explain what necessitates this geographical expansion, especially into Marine Sanctuary waters. This is clearly the threshold issue;

The proposals are open ended, i.e., there is no sunset clause. In its present guise, the proposal appears to be an attempt to enlarge the military's already oversized footprint in Hawaii. Land use, climate, population, geopolitics, etc. all change over time. The proposed Alternatives, if approved, must include a reasonable time limit, after which the need for these proposed training events must be reevaluated;

Words do not make truth. There is no apparent basis for the Navy to state that the Alternatives will have no or negligible impact on water, marine, geological, visual, etc. resources when the DEA has not even considered them. It is hard to believe that six hundred exercises a year, some as long as 72 hours, would have no impact;

The DEA is replete with undefined words such as "negligible", "minimal", "unlikely", when describing potentially undesirable events. So that it is clear to anyone reading the DEA exactly what the Navy is alleging, these terms must be defined;

Marine sanctuaries have been established along the Kohala and Kona coasts and elsewhere to protect endangered marine mammals. That the Navy would propose an acceptable "kill quota" within these sanctuaries is beyond repulsive. These are endangered species in protected waters. WHAT ARE YOU THINKING? No military activity should be permitted within the sanctuaries. The very fact that the Navy would be allowed such a quota suggests it is not being forthright about the full extent of activities and danger associated with the proposed Alternatives. What does the Navy propose to do that can kill a whale?

For these and numerous other reasons, I find that certain aspects of the proposed Alternatives are unacceptable and the DEA to be woefully inadequate. Please do not approve this DEA.



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Charles Flaherty (return address not provided)

Dear Charles Flaherty:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

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As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Charles Flaherty.

Copy to: Hawaii Department of Land and Natural Resources

January 6, 2019

NavFac Engineering Command Pacific  
Attention: Project Manager, EV21.JZ  
258 Makapala Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Re: Draft Environmental Assessment for Naval Special Operations Training and Proposed Undertaking, State of Hawai'i, November 2018

Aloha,

I am commenting on the Draft Environmental Assessment for Naval Special Operations Training (Draft EA) proposing small unit intermediate and advanced land, maritime, and air-based training activities for naval special operations personnel in the nearshore waters and land-based areas on Oahu, Island of Hawai'i, and Kauai, and in nearshore waters (including harbors and bays) of Maui, Molokai, and Lanai (the Undertaking).

Section 106 of the National Historic Protection Act (Section 106), 16 U.S.C. Section 470f, requires federal agencies to take into account the effects of their undertakings on historic properties and provide the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on those undertakings. The ACHP has issued the regulations implementing Section 106, 36 CFR Part 800, "Protection of Historic Properties." The NHPA requires that, in carrying out the requirements of Section 106, each federal agency must consult with any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by the agency's undertakings.

There are several Native Hawaiian Organizations with members within the areas to be impacted by the Undertaking have not been notified of the Undertaking. As such, the Undertaking, if implemented, would be in violation of the NHPA because the required consultation with Native Hawaiian Organizations and identification of existing traditional, customary, and religious practices that would be adversely impacted by the Undertaking would not have occurred. The Undertaking, if implemented, could result in irreparable harm requiring injunctive relief.

The National Environmental Protection Act (NEPA) created the Council on Environmental Quality (CEQ) to administer regulations viewed as the cornerstones of the Federal environmental review procedures. The CEQ Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, (40 C.F.R. Parts 1500-1508) encourage integration of the NEPA review process with other planning and environmental reviews, such as Section 106. Section 106 regulations encourage agencies to plan Section 106 consultations coordinated with other requirements of other statutes, as applicable, such as NEPA. The concepts of "coordination" and "integration" are found in both the CEQ regulations and Section 106 regulations, because they provide efficiencies, improve public understanding, and lead to more informed decisions.

However, the Draft EA Proposed Action states in part, "Specific minimization and avoidance measures may be added after Section 106 consultation (including coordination with Native Hawaiian organizations) is complete." This statement, together with the fact Native Hawaiian Organizations have not been notified of the Undertaking, indicates the Section 106 and Draft EA processes are not being coordinated and integrated. The result is that efficiencies, public understanding, and informed decisions are being undermined and crippled.

The Draft EA states the Proposed Action is "non-invasive in nature". This is a false statement given the Proposed Action, training for future invasion of areas around the globe by Naval Special Operations, is explicitly invasive in nature. Indeed, the Proposed Action represents an attack on the Hawai'i state constitution, Hawai'i Revised Statutes, the public trust, and Native Hawaiian traditional and customary rights.

The Draft EA and the Proposed Action should be withdrawn for legal, ethical, and moral reasons.

At the very least, an Environmental Impact Statement process should be undertaken in coordination and integrated with the Section 106 process.

Thank you, Mahalo,

Charles Flaherty



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Cindy Roher ([sheiks2@aol.com](mailto:sheiks2@aol.com))

Dear Cindy Roher:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or

explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Cindy Roher.

Copy to: Hawaii Department of Land and Natural Resources

**From:** sheiks2@aol.com  
**Sent:** Monday, January 7, 2019 1:18 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] RE: Opposition to Special Operations training on Hawaii Island & it's waters

Attn. Project Manager:  
Naval Facilities Engineering Command Pacific

I am writing this letter opposing the proposed new expansion of military operations along the Kohala & Kona coastlines for increased water-based training & new land based training on the Big Island of Hawaii. I also oppose both alternatives 1 & 2 for all the islands for the following reasons.

1. The Navy's proposed training areas lie within the boundaries of the Hawaiian Islands Humpback Whale National Marine Sanctuary around the islands, of Hawaii, Maui, Molokai, Lanai, & Oahu. The Navy states its proposed actions will have no negative or significant impacts on the marine life & but there are studies that state the opposite. Hawaii Island's west coast waters are among the cleanest, clearest, & most biologically diverse in the state. It is a fragile ecosystem including a variety of corals, fish, dolphins, the endangered monk seal, & the area is one of the primary breeding grounds for the humpback whales. The coast is still recovering from the consequences of the warming waters & needs time to heal itself not add more stresses to its environment.
2. The military, in this case, the Navy is required by law to justify why it needs to conduct a proposed action in a certain place. The Navy claims that it can't provide combat ready forces unless it conducts its training here. The US government is the 2nd largest land owner in the State, its footprint covers over 500,000 acres (13% of the State). Nothing in its proposal justifies why the Navy cannot conduct diverse & productive training at any one of the huge military bases in the State, or San Diego, or the multiple training facilities in the United States or around the world for that matter. The military already has a bad track record for environmental damage with little regard to correcting its impact or taking responsibility for its actions.
3. The economic impact to the Island's tourism is a critical aspect, especially since it is still recovering from the eruption's effects, a natural disaster, not man made. Nobody wants to come to what they visualize as a pristine & unique environment & discover they have entered a war zone. It also is beyond common sense to not recognize the potential impacts to the unique cultural & natural resources revered by the community, & the visitors from the mainland & world that once gone, can never be replaced.

This proposal or any others suggested like it, have no merit & it's amazing the residents have to point out what a poor plan it is. Please heed the many objections aimed at the misguided plan for these exercises, and stop them at once.

Cindy Roher  
North Kohala



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Daniel Schechter ([treefrog@daniel1948.net](mailto:treefrog@daniel1948.net))

Dear Daniel Schechter:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or



leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing recycling and disposal programs.

The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the ground, or in air, in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 5, 2019 comment letter from Daniel Schechter.

Copy to: Hawaii Department of Land and Natural Resource

**From:** Daniel <treefrog@daniel1948.net>  
**Sent:** Saturday, January 5, 2019 1:55 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Training exercises near Maui

To Whom it May Concern:

I am writing to ask you to cancel any and all plans for military training and/or exercises on or near Maui, Hawaii. Maui is the winter home for humpback whales which are important for tourism here in Maui, as well as turtles and other marine wildlife that live here year around. Motorized watercraft disturb these animals, which are already under significant stress from commercial activity. And although the Navy claims it will "leave no trace," motorized craft always leave pollution in the form of fumes and leakages of fuel as well as leakages of motor oil and other lubricants.

I would welcome any and all military personnel to come and experience the beauty that is Maui and its surrounding oceans. Come paddle a canoe or kayak and see the animal life up close or engage in the other activities that Maui has to offer. But PLEASE, no military exercises or motorized military craft.

Sincerely,

Daniel Schechter  
4 Leanihi Ln  
Kihei, HI



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Deborah Chang ([kulaiwi@outlook.com](mailto:kulaiwi@outlook.com))

Dear Deborah Chang:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

There is no time limit or expiration date associated with EAs. The document and analysis remain active until there is a change in the activities that were originally assessed, which would prompt another review. If the change is substantive, then a supplement or new EA may be prepared. For example, a trigger leading to a supplement or new document could be newly listed threatened or endangered species, substantial increases in training frequency, or proposed new training activities.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Therefore, Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee

familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. The purple area depicted on the maps in the Draft and Final EAs is a Study Area. Training is not proposed in any ponds including anchialine ponds (e.g., Aimakapa or Opaepa ponds). Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian

Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Area of Potential Effect (APE) for NHPA Section 106 is synonymous with the project training study area and has been revised for the Final EA. Training would be conducted in selected coastal nearshore waters and shorelines, and inland locations throughout the State of Hawaii. Only water-based and land-based training is proposed for the Island of Hawaii; no air-based training would occur. The purple area depicted on the maps in the Draft and Final EAs is a study area. The APE is larger than the actual area that would be used for the proposed training due to the application of buffer areas, and would be limited to smaller sites on federal land and on state and private land - the latter of which would have the consent of property owners before training activity occurs. The APE/study area for Hawaii Island consists of three separate segments of the western coastline: from north to south, the first segment includes the Kohala coast from Mahukona Bay/Beach Park to Kawaihae Harbor; the second segment is from Kahuwai Bay to Puhili Point on the Kona coast; the third segment is from Honokohau Small Boat Harbor to Kahului Bay, also on the Kona coast. Based on coordination and discussion with the National Park Service, the Kaloko-Honokohau National Historical Park and Kealahou Bay have been deleted from the APE/Study Area. Per your comment, the spelling of Kawaihae has been corrected in the Final EA.

The Navy has identified a number of historic properties, including the Ala Kahakai Trail, which is comprised of a number of cultural resources, including Traditional Cultural Properties. Although the Ala Kahakai Trail is within the APE, training is not proposed on the trail. Also, high-angle climbing is not proposed on Hawaii Island. High-angle climbing activities would only occur on rock faces in the North Oahu Region at a location currently used for rock climbing. There would be no activities on cliffs to cause erosion and no new placements of drilled anchoring systems.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 5, 2019 comment letter from Deborah Chang.

Copy to: Hawaii Department of Land and Natural Resources

January 5, 2019

Naval Facilities Engineering Command Pacific  
Attention: Project Manager, EV21.JZ  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Dear Project Manager,

SUBJECT: Comments on the Draft Environmental Assessment (DEA) for Naval Special Operations Training in the State of Hawai'i

The proposed Naval Special Operations Training would have substantial and significant potential impacts on Hawai'i's environment, public coastal recreational activities, natural and cultural resources in public nearshore waters and coastlines, and cultural/historic properties. A full Environmental Impact Statement should be required of such an expansive proposal. The DEA, as written, does not support the Applicant's position that the impacts will be insignificant. It is also rife with inaccuracies and incomplete information, demonstrating the need for more extensive research. My concerns re: information contained in the DEA include (but are not limited to):

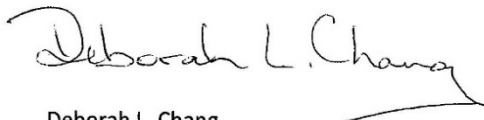
1. A basic requirement of any DEA is to clearly identify the locations of the proposed actions. In the case of Hawai'i Island, the Area of Potential Effect (APE) is poorly identified. The DEA repeatedly describes the APE as including "two stretches of the western coast from Mahukona State Park to Kawaihai [sic.] Harbor in Kohala and from Hualalai Golf Course to Captain Cook in Kona." (The misspelling of Kawaihae is repeated throughout the DEA.) On p. 3-124 it says that the APE is "along two stretches of the Kona coast." This is inconsistent with the earlier statement. The map on p. 1-11 shows the "Training Study Area" as extending to Kailua-Kona Bay, which is miles north of Captain Cook. Further confusing, Table 3-8 lists "Kealakekua Bay Historical District" as being in the APE. Does the APE stop at Kailua-Kona Bay, or does it continue south to Captain Cook or Kealakekua Bay?
2. The DEA does not identify which State and County permits will be required prior to commencing training activities. P. 4-164 assures the people of the State of Hawai'i that "Training would only occur on non-federal property if proper consent was given." P. 1-2 mentions "right-of-entry permits" for training on non-federal property. Presumably State and County permits will need to be obtained to conduct training on public lands and in public waters, i.e., coastal lands within Hawai'i's shoreline definition and nearshore waters. What conditions and restrictions will be imposed by those permits? How will the public be notified when public lands and public activities are to be affected? How will the effects on outdoor recreation activities be mitigated?
3. I couldn't find any indication in the DEA that there is a specific time limit to the requested approval. If approved, how many years would this training continue? There should be a specified time limit.

4. How will damage to cultural/historic properties be avoided, especially if the locations of cultural/historic sites are not known? The APE on the island of Hawai'i contains hundreds, perhaps thousands, of historic and archaeological sites, which have never been nominated to or recognized by the National Register of Historic Places (NRHP). The statement on p. 3-128 of the DEA that "No Traditional Cultural Properties have been identified in the APE on Oahu or Hawaii Island" assumes that none exist? There are hidden burial caves, remnant habitation sites, fishing shrines, petroglyphs, trails, sites submerged by sand, even one remnant fish enclosure associated with Kamehameha I off-shore within the APE of Hawai'i Island that are not listed in the NRHP and unknown to most people. These sites are vulnerable, and the risk of damaging or destroying them in Naval training activity is unacceptable.
5. Pond identification is inadequate in the DEA. There are many more ponds frequented by endangered waterbirds in the APE on Hawaii Island in addition to 'Ōpae'ula and 'Aimakapā Ponds (shown in Figure 3-6, p. 3-83). Anchialine ponds at Kohanaiki as well as the Kealakehe County Sewage Treatment Plant are a few, well-known waterbird sites.
6. "High angle climbing" should not be attempted on highly erodible cliffs. The DEA has not identified where such conditions exist in the APE. This is a common condition that is not only potentially hazardous but is also threatening the continued existence of historic coastal trails.

These are a few major concerns with the DEA that highlight the need for a more thorough, accurate, and comprehensive study of the APE on Hawai'i Island. In conclusion, the information presented in the DEA for this wide-ranging training proposal does not support its claim that the effects of training activities will be "minor and temporary." Substantially more research and data gathering needs to be done via a full Environmental Impact Statement, given the potential impacts of such an extensive APE.

Thank you for your consideration of my concerns.

Sincerely,



Deborah L. Chang  
[kulaiwi@outlook.com](mailto:kulaiwi@outlook.com)

cc:  
Mr. Samuel Lemmo, Administrator OCCL





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Gail Jackson ([billgail@retiredinparadise.net](mailto:billgail@retiredinparadise.net))

Dear Gail Jackson:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs; consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), Hawaii Office of Planning, Coastal Zone Management (CZM) Program, and State Historic Preservation Officer (SHPO); coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. In accordance with the Endangered Species Act and Marine Mammal Protection Act, the Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the

State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Gail Jackson.

Copy to: Hawaii Department of Land and Natural Resources

**From:** billgail@retiredinparadise.net  
**Sent:** Sunday, January 6, 2019 6:07 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Navy War Games on South and North Kohala and North Kona Coast on Hawai'i Island

Naval Facilities Engineering Command Pacific, Attention: Project Manager, EV21.JZ

Have you contacted Governor Ige and all county Mayors about your plans? If not, you are disrespecting our State Constitution and you are disrespecting We the People - residents of Hawaii.

The Hawaii Constitution Section XI subsection 1 provides:

"For the benefit of present and future generations, the State and its political subdivisions shall conserve and protect Hawaii's natural beauty and all natural resources, including land, water, air, minerals and energy sources, and shall promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of the self-sufficiency of the State.

All public natural resources are held in trust by the State for the benefit of all people. It is on the basis of this constitutional "Public Trust" provision that decisions involving land and water must be guided by the "Precautionary Principle" when we weigh our private wants against the ability of the environment to accommodate those wants.

The precautionary principle requires long-term vision and mandates that government entities favor cation and conservation in any case in which information is uncertain. The burden of proving that the resource is adequate and that its proposed use is consistent with the sustainable health of the ecosystem falls on the party proposing to use the resource.

It is clear that you will impair marine life. Any "taking" of any marine life is illegal ... you cannot just override a State's Constitution. You cannot decide your definition of "culture" overrides the State's Constitution. This action affects everyone living in this state and the many tourists who come to enjoy our beautiful state's beaches, parks, mountains and cultural sites. Fishermen, tour boats, tour companies will also be negatively affected.

For marine mammals like whales and dolphins, which depend on their sense of sound to communicate, navigate and find prey, this ocean noise from your activities can be devastating. **Deafening a whale is the equivalent of killing that whale—it just happens more slowly.** And even exposures that don't cause this level of physical harm disrupt these animals' behavior and can drive them away from areas vital for feeding, breeding or raising their young.

Sincerely,  
Gail Jackson  
68-1907 Linapoepe St  
Waikoloa, HI 96738  
808 883-2134



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Gay Freeman ([gaylynnfreeman808@gmail.com](mailto:gaylynnfreeman808@gmail.com))

Dear Gay Freeman:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for

5000-45E  
N45  
April 12, 2021

trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Gay Freeman.

Copy to: Hawaii Department of Land and Natural Resources

**From:** GL Freeman <gaylynnfreeman808@gmail.com>  
**Sent:** Monday, January 7, 2019 8:53 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Kohala Coast Big Island

You cannot seriously be thinking of interrupting the whale migration path! The pristine waters and coast line of West Hawaii. The resort areas of Big Island are in jeopardy. If you do this you will cost Hawaii and the resorts money they cannot afford to lose after this last year.

It should be illegal to subject this island to "war games". You must be stopped.

Please consider what you will be doing to the people who pay big dollars to hang out on the quiet side of the island. And the people who work the resort to feed their family's. I feel this will cost Big Island \$\$\$\$ in future tourism. We cannot afford your games.

You Must show Aloha! This is Hawaii. Respect our lands and waters.

Truly,  
Gay Lynn Freeman

--

Gay Lynn Freeman  
[GayLynnFreeman808@gmail.com](mailto:GayLynnFreeman808@gmail.com)  
808-747-1091

**TODAY**



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Gwendolyn Etessami ([maui\\_skye@yahoo.com](mailto:maui_skye@yahoo.com))

Dear Gwendolyn Etessami:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the



proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 5, 2019 comment letter from Gwendolyn Etesami.

Copy to: Hawaii Department of Land and Natural Resources

**From:** skye etessami <maui\_skye@yahoo.com>  
**Sent:** Saturday, January 5, 2019 8:11 AM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] Proposed Active Warfare Practice in Maalaea Bay, Maui

I strongly oppose this proposal. This area is a National Marine Sanctuary! There should be no military interference, unless it is a National Emergency!

Warfare practice in this area will displace thousands of visitors and tourists from activities: sailing, snorkeling, fishing, whale watching, etc. That means thousands, if not millions of dollars will be circumvented from entering our Maui (Hawaii) economy. I cannot see it benefiting anyone or anything on Maui.

I suggest you practice your active warfare off Oahu's military based shores. That is an area more likely to be targeted by foreign actions.

Please! I implore you, do not do this to Maui.

Mahalo

Gwendolyn Etessami



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 6, 2021

Makana Koyanagi  
PO Box 54  
Paauilo, HI 96776

Dear Makana Koyanagi:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts to any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites. As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event.

Based on the analysis in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs, environmental impacts from the training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Section 2.1 and Table 2-4 of the Draft and Final EAs). Overall, the non-invasive nature of the naval special operations training activities (e.g., no live-fire, no construction, no digging, no fires, no human waste) would have minimal effects on the environment because of the short duration, infrequency of occurrence, and low intensity of the proposed training activities. Because the goal of training is for the trainees to be in the field undetected, the environment would be minimally disturbed and materials (e.g., gear and trash) would not be left behind. As analyzed in Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs, no significant impacts would occur with implementation of the preferred alternative (Alternative 2).

Naval Special Warfare Command (NSWC) will also conduct training in accordance with military training procedures, approved standard operating procedures, best management procedures, and protective measures, including Chief of Naval Operations Instruction 5100.23G, *Navy Safety and Occupational Health Program Manual* (2011). See Chapter 2, Section 2.6 (Best Management Practices and Standard Operating Procedures). Training activities would be consistent with management objectives of individual sites, including prohibiting training in sensitive areas containing important natural and cultural resources. For example, if a site has been revegetated with native plants and the public is prohibited from entering that area, NSWC would also observe this restriction and not enter the area.

As described in Section 3.3.3.2.2 (Marine Biological Resources) of the Draft and Final EAs, as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the

vessels and marine substrates could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when in operation. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin The Environmental Notice on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R  
.1229438936

Digitally signed by  
ENG.SHERRI.R.1229438936  
Date: 2021.04.06 14:58:16  
-10'00'

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Makana Koyanagi.

Copy to: Hawaii Department of Land and Natural Resources

### The Cost of Military Expansion

An issue has recently been brought to my attention and that issue is that our marine life could be damaged by future military training happening by air, land, and sea on our Hawaiian Islands. Training in the water will consist of swimming and diving, launching and recovering small vehicles and inserting and extracting water crafts. Land based training includes crossing the beach on foot and engaging in high angle climbing and lastly, air based training includes unmanned aircraft by using drop zones or landing zones for parachute or rope suspension training activities. All this stated by a news article in West Hawaii Today called Joint military special ops excuses planned.

This training will include naval bases, as well as, Army, Air Force and U.S Marine Corps. Training will happen near Kohala and North Kohala coasts on the Big Island of Hawaii, my home. It is also planned to have these training happen in North Kona from Kukio Bay to about Waiaha Bay, south of Kailua Bay. These Trainings will happen in nearshore water close to our beaches and land based areas on Oahu. Training and exercises will also be happening at harbors and bay areas in Maui, Molokai, and Lani'i, but as the articles states the training activities would not restrict the ability to use or access recreational areas, but we are not sure of that.

As a local of Hawaii, born and raised, this worries me because if military training continues on our land and sea, not only will that affect our marine life and coral but, the pollution of the boats and oils will bring more damage. By land, we could be damaging our trees and our air by putting jet fuel combustion in our atmosphere by the military training by air also. "The military needs to clean up the toxic messes all over Hawaii, not expand their training into our parks and on the slope of sacred Mauna Kea." Jim Albertini stated. To hear this makes me furious and I also agree with him because, this year 2018-2019 I had the opportunity of going up to Mauna Kea to watch the sunrise one morning and it was beautiful from where we were. To see that go away by military training makes me sad. I do not want our land to be destroyed by continuous training. I also do not want to see our skies turn grey, by carbon dioxide and smog. That sunrise was beautiful and the definition of what makes Hawaii a paradise location for many people. I would hate to see our beautiful marine life and lands turn down hill and lose all color by military training that could be happening somewhere else.

As a concerned and worried person and teenager born and raised on the Big Island of Hawaii, the law types of activities and decisions worry me for my future and for the next generations who will have to pay for the causes and damages we are doing now.

Makana Koyanagi  
P.O Box 54, Paauilo Hawaii 96776

**ENCLOSURE**



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Josephine Keliipio ([jili808@yahoo.com](mailto:jili808@yahoo.com))

Dear Josephine Keliipio:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Comments and Responses) of the Final EA.

Your concern about military expansion is outside the scope of the project. However, for clarification and as discussed in Section 1.1 (Introduction) of the Draft and Final EAs, naval special operations personnel have been training in certain areas of the State of Hawaii for decades. The Proposed Action is needed to meet current training deficiencies and ultimately provide combat ready naval special operation forces.

During the development of the alternatives, Naval Special Warfare Command (NSWC) considered three training area screening factors (training, safety and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate requirements prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel.

The “increase in training” and “size of study area” are not what triggers the need to conduct an Environmental Impact Statement (EIS). An EIS is prepared when an agency determines that a proposed action may significantly affect the quality of the environment. The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules [HAR] Section 11-200-12 and 40 Code of Federal Regulations [CFR] Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the EA, consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment; therefore, the preparation of an EIS is not necessary.

Chapter 3 (Affected Environment and Environmental Consequences) of the Draft and Final EAs presents an analysis of the potential direct and indirect effects of each alternative. Chapter 4 (Cumulative Impacts) of the Draft and Final EAs evaluates the impact on the environment that may result from the

incremental impact of the action when added to the other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. The environmental impacts from the proposed training activities are expected to be minimal, short term, and temporary based on the (1) relatively low intensity of the impacts, (2) localized nature of the impacts, (3) infrequent nature of the impacts, and (4) brief duration of the activities (see Table 2-4 of the Final EA).

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition, explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Proposed training would occur only on sites with the permission of landowners or managers and receipt of rights of entry or other real estate agreements. In addition, only water-based and land-based training is proposed for the Island of Hawaii; no air-based training would occur. Please note the purple area depicted on the maps in the Draft and Final EAs is a study area and is greater in area than the sites where training activities would occur.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Josephine Keliipio.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Josephine Keliipio <jlili808@yahoo.com>  
**Sent:** Monday, January 7, 2019 3:47 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Opposing military special ops training in Hawaii

No special ops training anywhere on island of Hawaii except for Pohakuloa. You folks dont clean up your mess on Pohakuloa so DO NOT use anywhere outside of Pohakuloa to train. Y'hear?

Also, I agree with everything that Jim Albertini has listed in his letter as follows:

"Your finding of No Significant Impacts is a lie. This massive military intrusion into our coastal nearshore waters, public shorelines and public spaces has lots of significant impacts – cultural, environmental, etc., including the expansion and normalization of militarism in our communities. Hawaii is already one of the most militarized places on the planet with more than 100 military installations. The cultural and environmental consequences of these installations along with more than 125 years of illegal US military occupation of Hawaii has been catastrophic. On top of that now the military wants to conduct Special Operations (Special Ops) beyond its military installations. On this basis alone the entire plan for Military Special Ops should be scrapped as military madness beyond the pale.

A specific point to invalidate the Draft EA and require a full EIS is that the draft EA is incomplete and does not cover all the Special Ops that have been planned. I will cite one specific case below involving Navy Special Ops planned for Mauna Kea Recreation Area and the slopes of Mauna Kea that was not included in the Draft EA Special Ops. Given this fact, there is reason to believe there may be additional Special Ops also planned for other areas that were also not included in the draft EA Special Ops. Here is the link for the Navy Special Op planned for Mauna Kea Recreational Area. <https://drive.google.com/file/d/1BctJ9aw2rcJlQG3YNsM95rQgqWBnFIV/view?usp=sharing>

This Special Op according to press reports of Nov. 28, 2018 (Hawaii Tribune-Herald and West Hawaii Today front page articles) was cancelled due to community opposition. But this was done after the Draft EA Special Ops was published.

Let's face it. US military Special Ops (that include drone and sniper assassinations) are now desperate attempts on behalf of the US empire to maintain global domination for corporate interests. According to a recently released Brown University study, the U.S. military is now in 80 countries and has spent nearly \$6 TRILLION dollars since 9-11 in this effort. It discusses the disastrous human, social, and economic toll war has on all parties involved. See Updated Cost of War Data Shows U.S. Military Now in 80 Countries - Peace Science Digest  
 <[https://i.facebook.com/l.php?u=https%3A%2F%2Fpeacesciencedigest.org%2Fupdated-cost-of-war-data-shows-u-s-military-now-in-80-countries%2F%3Futm\\_source%3DNewsletter%2BList%26utm\\_campaign%3Dffa5f75ddd-EMAIL\\_CAMPAIGN\\_2019\\_01\\_03\\_08\\_36%26utm\\_medium%3Demail%26utm\\_term%3D0\\_938552ca49-ffa5f75ddd-134637849%26fbclid%3DIwAROR6maP0\\_ZRYzoYoov3cp2GseZNEuH9965SjanXhSNcWzVZvjtswjM91Dk&h=AT2CFRwtObPWG3TW8GTluSKUdYeIWL1rnTo0EHaHQLp8Q4rTqoPm8\\_uq5jP050wSbea1h5vGSpZnIAEUyioG\\_6d3gF7Aoo\\_d97FRQy27Jg26B5Wj1wmkvqUhecWJ-hc6aSZNwoMLgrk8tFs6U1BopXY](https://i.facebook.com/l.php?u=https%3A%2F%2Fpeacesciencedigest.org%2Fupdated-cost-of-war-data-shows-u-s-military-now-in-80-countries%2F%3Futm_source%3DNewsletter%2BList%26utm_campaign%3Dffa5f75ddd-EMAIL_CAMPAIGN_2019_01_03_08_36%26utm_medium%3Demail%26utm_term%3D0_938552ca49-ffa5f75ddd-134637849%26fbclid%3DIwAROR6maP0_ZRYzoYoov3cp2GseZNEuH9965SjanXhSNcWzVZvjtswjM91Dk&h=AT2CFRwtObPWG3TW8GTluSKUdYeIWL1rnTo0EHaHQLp8Q4rTqoPm8_uq5jP050wSbea1h5vGSpZnIAEUyioG_6d3gF7Aoo_d97FRQy27Jg26B5Wj1wmkvqUhecWJ-hc6aSZNwoMLgrk8tFs6U1BopXY)>

This Military Madness needs to stop. Let it begin in Hawaii! No Military Special Ops. The US needs to learn Hawaiian Ho'oponopono, a process of healing, making right instead of waging war. The US military needs to begin to Live Aloha — clean up the massive mess it has made in Hawaii — unexploded ordinance, chemical and nuclear contamination, etc. and then demilitarize Hawaii and end its illegal occupation and restore Hawaii as it was — an independent nation of military neutrality.

Jim Albertini, President"

Mahalo,  
 Josephine Keliipio  
 Kailua Kona, Hawaii 96740



## DEPARTMENT OF THE NAVY

COMMANDER  
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5000-45E  
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April 12, 2021

Kaleb Yamasaki ([Alison\\_English/HONOKAHI/HIDOE@notes.k12.hi.us](mailto:Alison_English/HONOKAHI/HIDOE@notes.k12.hi.us))

Dear Kaleb Yamasaki:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or

leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any

disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Kaleb Yamasaki.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Alison\_English/HONOKAHI/HIDOE@notes.k12.hi.us  
**Sent:** Monday, January 7, 2019 2:43 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Public Testimony against Military Expansion

Kaleb Yamasaki  
46-3636 Old Mamālahoa Hwy  
Honokaa, HI. 96727  
kalebwovldgo@gmail.com <mailto:kalebwovldgo@gmail.com>

I was born and raised in Hawaii nei, the land I call home. We were always taught to take care of our land, never take advantage of what the land gives you. Our reefs are sacred to the people, the ocean is sacred to our people. We have lived off of waters of Hawaii for generations upon generations, and now people are starting to take advantage of it. I am unhappy and hurt with the decisions being made for the fate of my home.

The U.S. NSWC is planning on expanding their operations training toward west Hawaii, along with multiple other locations in the state. The plan is for the Navy to sink small vehicles into our reefs in order for them to test their new equipment and see if the terrain has any affect on the newly designed watercraft.

Think of it this way, they are basically using water tanks on the reefs that feed our homes and shelter our marine life. If you run tanks all along the reefs, how are we supposed to stop that from killing off the sea animals that live there? Once they die off or are brutally crushed by treads of a tank, how do we bring them and the reef back? Simple answer, you can't. Once something dies, it DOES NOT COME BACK TO LIFE. There is nothing you can do to fix a reef and it's ecosystem if you completely destroy it. The residents of Hawaii that live off of the land can not afford to lose the greatest source of their sustainability. Hawaii is a place to live and love, not a place to experiment.

Mahalo nui loa



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Taylor Thronas ([tthronas@gmail.com](mailto:tthronas@gmail.com))

Dear Taylor Thronas:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

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The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Taylor Thronas.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kapono Thronas <tthronas@gmail.com>  
**Sent:** Monday, January 7, 2019 10:04 AM  
**To:** NFPAC Receive  
**Subject:** [Non-DoD Source] NO ACTION PLEASE: Special Operations Training State of Hawaii Draft Environmental Assessment (Draft EA)

Hello,

I am writing in regards and to comment on the Draft Environmental Assessment by the Naval Special Warfare Command who proposes using public and private areas for naval training. As a lifelong resident of Hawaii and person of Hawaiian decent I urge the "No Action" option. Military training drills and otherwise should be confined to the currently designated Military Bases. The proposed drills and exercises will impact wildlife and residents in the area to a much greater extent than the EA acknowledges. It is impossible for the the Navy to conduct drills without affecting the area and inhabitants; wildlife, public land areas, public, etc. These areas host many endangered and/or endemic species as well as whales and turtles. Culturally to people of Hawaiian decent the drills represent a continued disrespect to our people and home.

Again I urge the 'No Action Option'

Thank You for your time,

Taylor K. Thronas





## DEPARTMENT OF THE NAVY

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NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Laakea Poepoe ([poepoelaa@gmail.com](mailto:poepoelaa@gmail.com))

Dear Laakea Poepoe:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. Under the Proposed Action, training on Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on Molokai. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with

the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Laakea Poepoe.

Copy to: Hawaii Department of Land and Natural Resources

**From:** La'a Poepoe <poepoelaa@gmail.com>  
**Sent:** Monday, January 7, 2019 8:03 PM  
**To:** sam.j.lemmo@hawaii.gov; NFPAC-Receive; Meagan.ostrem@mantech.com  
**Subject:** [Non-DoD Source] Navy Draft EA Molokai

Mr. Lemmo and Ms. Zimmerman,

Submitted by Laakea Poepoe, Molokai Resident

This letter is in opposition to the Navy Draft EA for training in and around Molokai. I am requesting Molokai be removed completely from the Draft EA.

With the amount of opposition coming from the community, our Molokai representative, Lynn Decoite has yet to take a position or demonstrate effort to communicate the community's position and reasonings to the appropriate agencies and government officials.

The area mentioned below is a traditional fishing ground with customary practices that will be affected by the proposed training. The fact that Hilia was not recognized in the draft EA proves that the report is insufficient.

"Hilia is an offshore area extending eastward from Pakanaka Pond through Kalamaula. It is now covered with mud, but formerly the shores had sandy beaches. Fish were very numerous here, especially small mullet which often came in great schools near the shore..." hilia. PEM: smitten. (Mullet were so numerous that fishermen kicked them ashore with the sides of their feet "ka l'a kā wāwae o hilia".) –Summers, 1971:1972

"After making the circuit of Lanai, (Aiai) went over to Molokai, landing at Punakou and travelled along the shore till he reached Kaunakakai. At this place he saw spawns of mullet, called Puai-i, right near the shore, which he kicked with his foot, landing them on the sand. This practice of kicking fish with the feet is carried on to this time, but only at that locality. Aiai continued on along the Kona side of Molokai, examining its fishing grounds and establishing ku-ulas till he got to Halawa." –hawaiian Fishing Traditions, 1992



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April 12, 2021

Lisa Hallett Andrews ([lisa.andrews851@gmail.com](mailto:lisa.andrews851@gmail.com))

Dear Lisa Hallett Andrews:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or

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The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Ground transportation support is discussed in Table 2-2 (Current and Proposed Equipment for Naval Special Operations Training). Ground transportation support vehicles that may be used on the Island of Hawaii include a passenger van, designated emergency response vehicle, and a pick-up truck. Vehicles would travel on existing established roadways and would operate the same as civilian ground transportation.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 8, 2019 comment letter from Lisa Hallett Andrews.

Copy to: Hawaii Department of Land and Natural Resource

**From:** Lisa Andrews <lisa.andrews851@gmail.com>  
**Sent:** Tuesday, January 8, 2019 12:03 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Please

The Kohala Coast on Hawaii island it is a precious resource that belongs to The people of Hawaii is conservation land, historic Sites, Ecosystem for endangered species, mating in birthing Waters for humpback whales, etc. The winds of Kohala are known for being unpredictable and could easily cause an accident that would cost millions not to mention lives that the military has invested huge time money and training in.

Emergency dispatch would have to come from Honolulu which would be 14 hours by boat.

Lisa Hallett Andrews

PO Box 423

Kapa'au, HI

96755



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April 12, 2021

Lokelanikuulei Makamae McMichael ([lokemcmichael@hawaii.rr.com](mailto:lokemcmichael@hawaii.rr.com))

Dear Lokelanikuulei Makamae McMichael:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

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NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

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The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Lokelanikuulei Makamae McMichael.

Copy to: Hawaii Department of Land and Natural Resources

**From:** lokemcmichael@hawaii.rr.com  
**Sent:** Sunday, January 6, 2019 7:54 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] To: Naval Facilities Engineering Command Pacific, Attention: Project Manager, EV21.JZ, 258 Makalapa Drive, Ste 100 Pearl Harbor, HI 96860-3134.

Dear Project Manager,

Please do your Navy training somewhere else. The Big Island has such a beautiful coast, bursting full of colorful marine life. We treasure our sacred Island and all the living animals. Tourist come here to see our cultural and historic landscapes. And to swim in our warm waters. The Spinner dolphins are so sweet! The false killer whales are endangered, so are monk seals. I look forward every year to having the Humpback Whales visit us and have their calves, who trust us and have for years. It's important to protect that which sustains us, all our natural resources. Please be good ocean stewards, protect and respect our sacred Island. Please respect marine life. I'm a Kanaka Maoli, I love my home.

Mahalo, Lokelanikuulei Makamae McMichael



## DEPARTMENT OF THE NAVY

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5000-45E  
N45  
April 12, 2021

Marilyn Bernhardt ([mkbak07@hotmail.com](mailto:mkbak07@hotmail.com))

Dear Marilyn Bernhardt:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

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Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Marilyn Bernhardt.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Marilyn Bernhardt <mkbak07@hotmail.com>  
**Sent:** Sunday, January 6, 2019 5:41 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Navy Draft Environmental Assessment for Kona and Kohala Coastline

This is a bad idea that gets worse reading through the proposal.

First of all, why is it necessary to expand training, especially in this area? There are many areas where this kind of training is already happening. Stay there.

In light of the fact that this is an environmentally sensitive area for wildlife, tourism, subsistence, and historic sites, it is ghastly to think that military maneuvers will be conducted. It should never be allowed.

The murky language assuring the public that this is safe and non-impacting is false and misleading. Until everything is properly defined there should be no consideration of this proposal.

This proposal should not be allowed. I am opposed to it.  
Marilyn Bernhardt

Sent from my iPad



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5000-45E  
N45  
April 12, 2021

Colleen Curran ([ccurran27@sbcglobal.net](mailto:ccurran27@sbcglobal.net))

Dear Colleen Curran:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

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Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, missile or bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp

fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service for the Proposed Action, and both agencies concurred with the finding of no adverse effects to terrestrial or marine species and designated critical habitat. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs, consultations with the USFWS, NMFS, and Hawaii State Historic Preservation Officer (SHPO), coordination with the Hawaii Department of Land and Natural Resources, and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment. Therefore, preparation of an Environmental Impact Statement (EIS) would not be required.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Colleen Curran.

Copy to: Hawaii Department of Land and Natural Resources

**SUBJECT: Opposition to the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui**

TO: Naval Facilities Engineering Command Pacific, Attention: Project Manager- [NFPAC-Receive@navy.mil](mailto:NFPAC-Receive@navy.mil)

COPIES TO:

1. Malu 'Aina Center for Non-violent Education & Action - [ja@malu-aina.org](mailto:ja@malu-aina.org)
2. US Fish and Wildlife - [Sarah\\_Levy@fws.gov](mailto:Sarah_Levy@fws.gov); [Jason\\_Holm@fws.gov](mailto:Jason_Holm@fws.gov); [Miel\\_Corbett@fws.gov](mailto:Miel_Corbett@fws.gov); [Brent\\_Lawrence@fws.gov](mailto:Brent_Lawrence@fws.gov); [Rylan\\_Suehisa@fws.gov](mailto:Rylan_Suehisa@fws.gov); [Rylan\\_Suehisa@fws.gov](mailto:Rylan_Suehisa@fws.gov); [Jane\\_Chorazy@fws.gov](mailto:Jane_Chorazy@fws.gov); [Jane\\_Chorazy@fws.gov](mailto:Jane_Chorazy@fws.gov)
3. Sierra Club - [contact@mauisierraclub.org](mailto:contact@mauisierraclub.org); [hawaii.chapter@sierraclub.org](mailto:hawaii.chapter@sierraclub.org)
4. Senator Mazie Hirono - [hawaiioffice@hirono.senate.gov](mailto:hawaiioffice@hirono.senate.gov)
5. Senator Brian Schatz - [casework@schatz.senate.gov](mailto:casework@schatz.senate.gov)
6. Representative Tulsi Gabbard - [TulsiOffice@mail.house.gov](mailto:TulsiOffice@mail.house.gov)
7. Maui News - [opinions@themauinews.com](mailto:opinions@themauinews.com)
8. Maui Now - [editor@mauinow.com](mailto:editor@mauinow.com); [wendy@mauinow.com](mailto:wendy@mauinow.com)
9. Hawaii Free Press - [Editor@hawaiiexpress.com](mailto:Editor@hawaiiexpress.com)

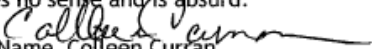
I am writing to strongly oppose the Navy's plans to expand active warfare practice in Ma'alaea Bay on Maui. According to the Navy draft assessment (See [Draft Environmental Assessment for Naval Special Operations Training November 2018](#)) the training will include sonar, active explosives, undersea warfare, missile-to-surface, to air, air-to-air missiles, to name a few.

Ma'alaea Bay and South Maui have many residents, vacation condos, Youth Center, Kihei Canoe Club, Maui Canoe Club, the Pink Paddlers - and the longest uninterrupted white sand beach in our whole state - where endangered turtles nest, and the habitat for monk seals and the endangered humpback whales give birth annually, making this a highly environmentally sensitive and high density area.

The U.S. Naval Special Warfare Command (NSWC) made a Finding of No Significant Impacts (FONSI). This finding is a completely inaccurate. The 2<sup>nd</sup> page of the abstract tells us all we need to know. The agency that wrote this is the Department of the Navy, with no cooperating outside agencies what so ever, such as the EPA, Dept of Land and Natural Resources, Dept of Fish and Wildlife etc. which should have been consulted extensively because of the environmental impact to three endangered species.

This massive intrusion into our coastal near shore waters, public shorelines and public spaces has lots of significant impacts - cultural, environmental, etc., including the expansion and normalization of militarism in our communities.

The military has miles of uninhabited beaches and lands to conduct their training all over the World. Why you would want to intrude on the public sector and destroy tourism in Hawaii makes no sense and is absurd.

  
Your Name Colleen Curran  
Address. 83 B Iliwai Loop, Kihei, HI 96753  
Email [ccurran27@sbcglobal.net](mailto:ccurran27@sbcglobal.net)





## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Maya Parish ([mayaparish@gmail.com](mailto:mayaparish@gmail.com))

Dear Maya Parish:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the

proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Section 3.3 of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Under the Marine Protection, Research, and Sanctuaries Act (16 U.S.Code Section 1431 et seq.) (also known as the National Marine Sanctuaries Act), the Secretary of Commerce may establish a national marine sanctuary for marine areas with special conservation, recreational, ecological, historical, cultural, archaeological, scientific, educational, or aesthetic qualities. Once a sanctuary is designated, the Secretary of Commerce may authorize activities in the sanctuary only if they can be certified to be consistent with the National Marine Sanctuaries Act and can be carried out within the regulations for the sanctuary. Regulations exist for each sanctuary, and military activities may be authorized within those regulations.

Section 304(d) of the National Marine Sanctuaries Act requires federal agencies to consult with the Office of National Marine Sanctuaries whenever their proposed actions are likely to destroy, cause the loss of, or injure a sanctuary resource. The Hawaiian Islands Humpback Whale National Marine Sanctuary is a single-species managed sanctuary, composed of waters around Maui, Lanai, and Molokai; and smaller areas off the north shore of Kauai, off the Island of Hawaii's west coast, and off the north and southeast coasts of Oahu. All of the proposed naval special operations training activities that would occur within the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final Environmental Impact Statement (EIS)/Management Plan for the Sanctuary, which under the Hawaiian Islands Humpback Whale National Marine Sanctuary regulations do not require permits or further consultation under Section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The proposed training activities addressed in the Draft and Final EAs are the same classes of activities previously analyzed in the Navy's 2013 and 2018 Hawaii-Southern California Training and Testing (HSTT) Final EISs/Overseas EISs and for which the Office of National Marine Sanctuaries found no consultation was required (U.S.Department of the Navy 2013, 2018). The activities proposed in this EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 HSTT Final EISs/OEISs and, therefore, consultation is not required.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the

vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Maya Parish.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Maya Parish <mayaparish@gmail.com>  
**Sent:** Sunday, January 6, 2019 2:45 PM  
**To:** NFPAC-Receive; sam.i.lemmo@hawaii.gov; Meagan.ostems@mantech.com  
**Subject:** [Non-DoD Source] Public Comment re Proposed Naval Training on the Kohala Coast

Aloha,

Please count my voice among the majority of my community in North Kohala as strongly against the proposed expansion of Navy training to non-Federal lands on the Kohala Coast. This proposed expansion of training area and exercises is extremely unpopular with our local community and disregards the area's cultural and environmental resources.

Please find just several facts supporting my opposition below:

- 1) In violation of federal law, the Navy did not consult with the Hawaiian Islands Humpback Whale National Marine Sanctuary. The Big Island locations selected for the Navy's proposed training are in one of the two significant humpback whale breeding grounds.
- 2) The Navy did not analyze the impacts of underwater noise on marine mammals such as whales, spinner dolphins, and the Hawaiian monk seal, or other marine life.
- 3) The Navy's proposed Best Management Practices for its training appears to violate NOAA's marine mammal approach distance regulations, allowing Navy training operations within 50 yards of endangered marine mammals.
- 4) The Navy all but ignores the cultural significance and culturally significant areas of the Kohala Coast. (For example, the 247-page EA document makes no mention of the Ala Kahakai Trail system)
- 5) The federal government is the second largest landowner in the State and already owns almost 13% of the State's land - the Navy can conduct its training on federal lands (for example, at Kaneohe Marine Corps Base or the Pacific Missile Range Facility on Kaua'i) rather than on the Kohala Coast, which contains some of the State's most significant cultural and historic sites and has some of the State's cleanest and most biologically diverse environments.

I respectfully ask that the Navy reconsider and NOT conduct any expanded training activities on the culturally significant and environmentally rich Kohala coast.

Mahalo,  
Maya Parish  
Hawi Resident



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Renee Collins ([rcollinsmac@me.com](mailto:rcollinsmac@me.com))

Dear Renee Collins:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

In addition, the proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Renee Collins.

Copy to: Hawaii Department of Land and Natural Resources

**From:** RENEE COLLINS <rcollinsmac@me.com>  
**Sent:** Sunday, January 6, 2019 7:52 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Subject: Naval Special Operations Training State of Hawai'i Draft Environmental Assessment (EA)  
**Attachments:** ShortWhalesMPNOAUDIO.mp4

January 6, 2019

Naval Facilities Engineering Command Pacific  
Attention: Project Manager, EV21.JZ  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Big Island - Maui, Hawaii  
Whale Season: Mid-Nov - May

Good Evening

I would like to give my input regarding the NSOT Kawaihae Harbor, Big Island. Every year the whales migrate down to the islands to give birth during Mid-Nov - May. While I understand your EV report I would like to make a plea not to hold your Training Ops near Big Island - Maui during the months of Nov-May. While I understand the statement regarding the whales will get out of the way, but you are in their Maternity Ward.

Mahalo  
Renee Collins  
59-457 Akaka Place  
Kamuela, HI 96743

[https://www.youtube.com/channel/UCaqZPOV4OADj2g4tNwy-\\_bQ?view\\_as=subscriber](https://www.youtube.com/channel/UCaqZPOV4OADj2g4tNwy-_bQ?view_as=subscriber)



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Ronald Fujiyosh ([ronsan2224@aol.com](mailto:ronsan2224@aol.com))

Dear Ronald Fujiyosh:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs; consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), Hawaii Office of Planning, Coastal Zone Management (CZM) Program, and State Historic Preservation Officer (SHPO); coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 7, 2019 comment letter from Ronald Fujiyoshi.

Copy to: Hawaii Department of Land and Natural Resources



**From:** Ronald Fujiyoshi <ronsan2224@aol.com>  
**Sent:** Monday, January 7, 2019 12:10 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Testimony opposing Military Special Ops in Hawaii

Sunday, Jan 6, 2019

Ronsan2224@aol.com <mailto:Ronsan2224@aol.com>

To: Naval Facilities Engineering Command, Pacific  
Attention: Project Manager, EV21.JZ  
258 Makalapa Drive, Ste. 100  
Pearl Harbor, HI 96860-3134  
via email to NFPAC-Receive@navy.mil <mailto:NFPAC-Receive@navy.mil>

Samuel Lemmo  
Office of Conservation and Coastal Lands Administrator Dept. of Land and Natural Resources State of Hawai'i  
1151 Punchbowl St., Room 131  
Honolulu, HI 96813  
via email to sam.i.lemmo@hawaii.gov <mailto:sam.i.lemmo@hawaii.gov>

Meagan Ostrem  
ManTech International Corporation  
420 Stevens Ave., Suite 300  
Sojana Beach, CA 92075  
via email to Meagan.ostems@mantech.com <mailto:Meagan.ostems@mantech.com>

cc: Malu Aina

RE: Draft Environmental Assessment and Finding of No Significant Impact (FONSI) for Naval Special Operations Training in the State of Hawai'i; Various Locations, State of Hawai'i; TMK: Various Locations (Upland and Submerged Lands of the State), published November 8, 2018

Here are my comments:

For God's sake, Hawaii was and still should be a neutral country. Treat our neutrality with respect!

Hawaii is actually an independent country, the Kingdom of Hawaii. Public Law 103-150 signed into law by President Clinton in November, 1993 admits that Hawaii's sovereignty was illegally invaded by the U.S. military. The case that went before the Permanent Court of Arbitration *Lance Larsen vs. The Kingdom of Hawaii* was presided upon by the three top legal professors knowledgeable of occupied countries. They concluded that under international law the Kingdom of Hawaii as a country still exists but is under occupation by the United States of America. Under international law, the occupying country MUST follow the laws of the occupied nation. Thus, the USA must abide by the laws of the Kingdom of Hawaii. The Kingdom of Hawaii had passed a law making itself a Neutral nation like Switzerland that would not participate in any military activity with any other nation. For this reason the U.S. Navy SHOULD NOT be involved in any military activity in Hawaii. If you do anything, train your navy in peaceful negotiation. Hawaii is the source of Ho'oponopono, a process of healing broken relations. With the development of nuclear weapons, weapons of mass

destruction and the use of drones to deliver these weapons, military combatants are not the only ones who are killed. Even President Trump has single-handedly decided to withdraw troops from Syria. This is the use of diplomacy, not the use of weapons of destruction. Thus, the US Navy, respecting the Neutrality of the Hawaiian Kingdom, if it should do anything in Hawaiian territory, it should be training its navy personnel on the Hawaiian art of healing broken relationships, Ho'oponopono.

Your finding of No Significant Impacts is unbelievable. The revealed proposal and that which is not revealed (like the use of Mauna Kea Park for Navy Ops) will surely impact all of Hawaii to such an extent that even the mention of FONSI is laughable. You plan beach invasions on land that is PUBLIC. All of the beaches in Hawaii are public, but administered by the Department of Land and Natural Resources. Above the beaches are private lands that are owned by thousands of residents. Have you contacted each one of them to ask for their consent? Evidently not. As an organization comprised of many, including native Hawaiians, we definitely oppose this EA (Environmental Assessment) and think you either have to rewrite it to explain exactly where you plan to stage beach invasions or reject it outright as inadequately written.

Thank you for the opportunity to comment!

Ronald Fujiyoshi, Treasurer

Ohana Ho'opakele, P.O. Box 5530, Hilo, HI 96720. Telephone: 808-959-9775; email: ronsan2224@aol.com <mailto:ronsan2224@aol.com>



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Shannon Rudolph ([shannonkona@gmail.com](mailto:shannonkona@gmail.com))

Dear Shannon Rudolph:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for

trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of naval special operations training as part of the proposed action. Hazardous materials and wastes would not be generated or released into the environment under the Proposed Action and expended batteries would be recycled or disposed of properly after returning from training activities through existing recycling and disposal programs.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the ground, or in air, in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Shannon Rudolph.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Shannon Rudolph <shannonkona@gmail.com>  
**Sent:** Sunday, January 6, 2019 10:00 AM  
**Subject:** [Non-DoD Source] Deny Draft EA & FONSI for Special Naval Ops for Hawai'i

Aloha,  
**RE: Draft Environmental Assessment and Finding of No Significant Impact (FONSI) for Naval Special Operations Training in the State of Hawai'i**

**Please deny the draft EA & FONSI for special Naval ops anywhere in Hawai'i.**

I am a 35 years resident of Hawai'i and have seen many decades of poor stewardship of Hawaiian lands by the military; from UXO, leaking fuel tanks, toxic spills, to depleted uranium that blows on the wind and is impossible to clean up.

I believe the military should not be expanding to other areas to contaminate & should concentrate on cleaning up the areas in their control that have already been contaminated.

Our tax dollars would be better spent cleaning up the toxic messes that have already been left on all Hawaiian Islands by the military - not creating more contaminated areas for people to deal with and pay for, in the future.

To say this proposed expansion has no significant impact to residents or land is a cruel joke to the people of Hawai'i.

Mahalo,  
Shannon Rudolph  
P. O. 243 Holualoa, Hi. 96725

--

How wonderful it is that nobody need wait a single moment before starting to improve the world. ~ Anne Frank



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
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JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Simmy McMichael ([simmy808@gmail.com](mailto:simmy808@gmail.com))

Dear Simmy McMichael:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from Simmy McMichael.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Simmy <simmy808@gmail.com>  
**Sent:** Sunday, January 6, 2019 11:36 AM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Naval Training in Hawaii

Aloha,  
I'am a Kanaka Maoli, and a grandmother.

I'm writing to ask you to please not have your training in our Hawaiian Ocean. We live in special Sacred Area. Our aumakua's are here and we need to respect and protect. For everyone now and the future generation.

The ocean is full Whales, Dolphins, Turtles, Hawaii Monk Seals and many are endangered species. The Kama'aina False Killer Whales are the only ones who call Hawaii their Home. Only a few thousands are left in this world.

These are very sensitive to noise and it can be critical to their well being. It causes stress, and panic attacks. Their hearing can be impaired and cause confusion. They are unable to adapt. This is their home, so, please do not disturb them and go away, somewhere far from here.

I lived, swam in a tank with these animals for 3 solid years. I worked at Sea Life Park on Oahu, Hawaii in the 1970's. They are intelligent, sensitive, and hearing the slightest sounds! I communicated with all of them on a daily basis.

I know for sure, your wartime exercises would not be appropriate at all.

I have a Surf Shop now in Kailua Kona for 41 years. I'm located at the Kailua Kona Pier. Dolphins are often seen here, numerous pods. I surf near the OTEC, a few miles from the Kona Airport. Often see Whales too!!

Whale come to this area to breed as well.

We have a very special place on Earth. We Love It, and we need to have our animals be Safe and Protected.

Please to not Disturb, and please go somewhere else far away.

Much Mahalo,  
Simmy McMichael



## DEPARTMENT OF THE NAVY

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5000-45E  
N45  
April 12, 2021

Teri Sherrow ([teri@terisherrow.com](mailto:teri@terisherrow.com))

Dear Teri Sherrow:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

Section 3.3 of the Final EA has been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Under the Marine Protection, Research, and Sanctuaries Act (16 U.S. Code Section 1431 et seq.) (also known as the National Marine Sanctuaries Act), the Secretary of Commerce may establish a national marine sanctuary for marine areas with special conservation, recreational, ecological, historical, cultural, archaeological, scientific, educational, or aesthetic qualities. Once a sanctuary is designated, the Secretary of Commerce may authorize activities in the sanctuary only if they can be certified to be consistent with the National Marine Sanctuaries Act and can be carried out within the regulations for the sanctuary. Regulations exist for each sanctuary, and military activities may be authorized within those regulations.

Section 304(d) of the National Marine Sanctuaries Act requires federal agencies to consult with the Office of National Marine Sanctuaries whenever their proposed actions are likely to destroy, cause the loss of, or injure a sanctuary resource. The Hawaiian Islands Humpback Whale National Marine Sanctuary is a single-species managed sanctuary, composed of waters around Maui, Lanai, and Molokai; and smaller areas off the north shore of Kauai, off the Island of Hawaii's west coast, and off the north and southeast coasts of Oahu. All of the proposed naval special operations training activities that would occur within the Hawaiian Islands Humpback Whale National Marine Sanctuary fall into classes of activities covered in the 1997 Final Environmental Impact Statement (EIS)/Management Plan for the Sanctuary, which under the Hawaiian Islands Humpback Whale National Marine Sanctuary regulations do not require permits or further consultation under Section 304(d) unless the military activity is modified in a manner significantly greater than was considered in a previous consultation. The proposed training activities addressed in the Draft and Final EAs are the same classes of activities previously analyzed in the Navy's 2013 and 2018 Hawaii-Southern California Training and Testing (HSTT) Final EISs/Overseas EISs and for which the Office of National Marine Sanctuaries found no consultation was required. The



activities proposed in this EA have not been modified in a manner significantly greater than those considered in the 2013 and 2018 HSTT Final EIS/OEISs and, therefore, consultation is not required.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures, and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 4, 2019 comment letter from Teri Sherrow.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Teri Sherrow <teri@terisherrow.com>  
**Sent:** Friday, January 4, 2019 7:02 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Navy testing in Maui waters JAN 2019?

We have been told that the Navy plans on commencing testing in Maui waters this month of January 2019!

There are scientific reports that do not support the Navy testing.

We have a whale sanctuary here and especially during this time, when they are giving birth and here at their most numerous it could threaten their species.  
This is NOT the time to test sonar.

Does the Navy have a right to play war games in a sanctuary? Do they need a permit?

You can read this article that even a fourth grader would understand.

Here is just one paragraph from the article in Scientific American: "Unfortunately for many whales, dolphins and other marine life, the use of underwater sonar (short for sound navigation and ranging) can lead to injury and even death. Sonar systems—first developed by the U.S. Navy to detect enemy submarines—generate slow-rolling sound waves topping out at around 235 decibels; the world's loudest rock bands top out at only 130. These sound waves can travel for hundreds of miles under water, and can retain an intensity of 140 decibels as far as 300 miles from their source.

Here is the complete article: <https://www.scientificamerican.com/article/does-military-sonar-kill/>

We welcome the Navy when they are not killing dolphins or whales...mammals are at risk, possibly even snorkelers !

Speaking of snorkelers...has there been any research of the effects of Navy sonar on people?

Mahalo for your time and attention to this matter, Teri Teri Sherrow e-PRO, GRI, CIPS Broker/Owner License # 17845  
International Real Estate Services, LLC

620 Kumulani Dr  
Maui, Hawaii, 96753  
808-283-5111 cell phone



## DEPARTMENT OF THE NAVY

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5000-45E  
N45  
April 12, 2021

William Simonsma ([billgail@retiredinparadise.net](mailto:billgail@retiredinparadise.net))

Dear William Simonsma:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy prepared the Draft EA to assess the environmental impact of the proposed training activities considering criteria for significance under both State and Federal standards (Hawaii Administrative Rules Section 11-200-12 and 40 Code of Federal Regulations Section 1508). The Draft EA anticipated a Finding of No Significant Impact (FONSI). Based on the analysis presented in the Draft and Final EAs; consultations with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), Hawaii Office of Planning, Coastal Zone Management (CZM) Program, and State Historic Preservation Officer (SHPO); coordination with the Hawaii Department of Land and Natural Resources; and consideration of public comments, no significant impacts have been identified and the analysis in the Final EA continues to support a FONSI with the implementation of the Proposed Action as described under the Preferred Alternative (Alternative 2). The proposed training would not significantly impact the quality of the human or natural environment.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. In accordance with the Endangered Species Act and Marine Mammal Protection Act, the Navy has consulted with the USFWS and NMFS for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As noted in the Draft and Final EAs, some training activities would generate noise in the environment, such as the use of surface vessels, vehicles, simulated munitions, and unmanned underwater vehicles (UUVs). The UUVs would only operate sonar devices that would use the same underwater noise frequencies that are found in commercial fish finding devices found on private and commercial fishing boats. No other types of sonar are proposed. The Draft and Final EAs analyzed the potential impacts from acoustic stressors to marine species in Section 3.3.3.2.2 (Marine Biological Resources). NSWC incorporates a number of activity-specific protection measures, installation-specific natural resource training constraints, and other factors to reduce the potential impacts of acoustic and other stressors on biological resources. These measures are summarized in Section 3.3.3 (Biological Resources, Environmental Consequences) and Section 2.6 (Best Management Practices and Standard Operating Procedures).

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii SHPO, and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the

State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 6, 2019 comment letter from William Simonsma.

Copy to: Hawaii Department of Land and Natural Resources

**From:** billgail@retiredinparadise.net  
**Sent:** Sunday, January 6, 2019 6:18 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] Navy War Games on South and North Kohala and North Kona Coast on Hawai'i Island

Naval Facilities Engineering Command Pacific, Attention: Project Manager, EV21.JZ

Have you contacted Governor Ige and all county Mayors about your plans? If not, I believe you are disrespecting our State Constitution and you are disrespecting We the People - residents of Hawaii. I also believe it is illegal to do so.

The Hawaii Constitution Section XI subsection 1 provides:

"For the benefit of present and future generations, the State and its political subdivisions shall conserve and protect Hawaii's natural beauty and all natural resources, including land, water, air, minerals and energy sources, and shall promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of the self-sufficiency of the State.

All public natural resources are held in trust by the State for the benefit of all people.

It is on the basis of this constitutional "Public Trust" provision that decisions involving land and water must be guided by the "Precautionary Principle" when we weigh our private wants against the ability of the environment to accommodate those wants.

The precautionary principle requires long-term vision and mandates that government entities favor cation and conservation in any case in which information is uncertain. The burden of proving that the resource is adequate and that its proposed use is consistent with the sustainable health of the ecosystem falls on the party proposing to use the resource.

It is clear that you will impair marine life. Any "taking" of any marine life is illegal ... I'm sure you cannot just override a State's Constitution. You cannot decide your definition of "culture" overrides the State's Constitution. This action affects everyone living in this state and the many tourists from all over the world who come to enjoy our beautiful state's beaches, parks, mountains and cultural sites. Fishermen, tour boats, tour companies will also be negatively affected. Do you understand what a thrill it is to be close to a breaching humpback whale?

Many studies show marine mammals like whales and dolphins, which depend on their sense of sound to communicate, navigate and find prey, this ocean noise from your activities can be devastating. Deafening a whale is the equivalent of killing that whale—it just happens more slowly. And even exposures that don't cause this level of physical harm disrupt these animals' behavior and can drive them away from areas vital for feeding, breeding or raising their young.

There are other military bases in this state (JBPHH, Marine Corps Base Kaneohe, PMRF, Pohakula Training Center, Schofield Barracks, etc.) where you can do this training without causing so much disruption to our state.

Sincerely,  
William Simonsma  
68-1907 Linapoepe St  
Waikoloa, HI 96738  
808 883-2134



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
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5000-45E  
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April 12, 2021

Ralph D Blancato ([ralphblancato@gmail.com](mailto:ralphblancato@gmail.com))

Dear Ralph Blancato:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National

Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 4, 2018 comment letter from Ralph Blancato.

Copy to: Hawaii Department of Land and Natural Resources



**Ralph D. Blancato**

Merchant Mariner # 2297982. Docu #409358  
Kapaau, North Kohala, Big Island

From: [ralphblancato@gmail.com](mailto:ralphblancato@gmail.com)  
Date: December 4, 2018 at 3:34:33 PM HST

To: [sam.j.lemmo@hawaii.gov.com](mailto:sam.j.lemmo@hawaii.gov.com)  
Subject: Misguided military exercises—Kohala Coast

Dear Sam and Meagan.

I am a U S C G merchant mariner living on the Kohala Coast of Hawaii island. I am vehemently opposed to the proposed military exercises along the Kohala Coast as its impacts to endangered marine life, Hawaiian archaeology sites and impact on residents and tourists alike will be far too dangerous and long lasting to warrant any merit.

The US Navy's request to use LFSA over a decade ago was denied by the federal government because of its impact on marine mammals in this same designated federally protected area. I fail to see how our military superiority in the world arena has made our planet a safer place for its inhabitants. As a resident of the state of Hawaii, a US citizen, taxpayer and voting member of the public, I implore you to stop this immediately Thank you.



Ralph D. Blancato Merchant Mariner # 2297982. Docu#409358  
Tel 808-896-9226



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 6, 2021

Carol Ankrom  
PO Box 100  
Kaunakakai, HI 96748

Dear Carol Ankrom:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer, and 62 Native Hawaiian Organizations, historic partners, and the public. Correspondence regarding the National Historic Preservation Act Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin The Environmental Notice on the Hawaii Department of Health's website..

Sincerely,

ENG.SHERR Digitally signed by  
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I.R.1229438  
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SHERRI R. ENG

Director

Regional Environmental Department

By direction of the Commander

Enclosure: January 1, 2019 comment letter from Carol Ankrom.

Copy to: Hawaii Department of Land and Natural Resources

Jan 1, 2019

Your pre-emptive strike of sending Navy seals to invade Molokai, its ocean, shore line, land, people, air and spirit <sup>on act of war</sup> ~~is~~ <sup>is an</sup> act of war against a First Nation people with guaranteed rights of no deprivation of their means of subsistence, enjoyment of their own cultural and traditional way of life, informed consent prior to activities on their lands, and self-representation. Your continued destruction of our island and its resources reveals your lack of respect for our island and us. As our past council representative said "Molokai is the last Hawaiian Island. We live by our Kūpuna's (Elders) historic legacy of pūke o'o (powerful prayer). "Our beliefs respect all life - yours do not."

We have spent the last few years working on a community land management plan which you have totally disregarded in your war motivated practices. You jeopardize our way of life, our future generations, and our very ability to survive as Hawaiians. We come to the table in peace with the goal of joint sovereignty - we come in peace, love, and prayer.

Do not think your military tactics will destroy our spirit. We stand with our amākauna in the place of pūke o'o. We are united in our belief that spirit will prevail. Carol Ankrom

**ENCLOSURE**



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 6, 2021

Carol Hiuton  
2781 Kamehameha V Hwy  
Kaunakakai, HI 96748

Dear Carol Hiuton:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Training activities would not interfere with or restrict public use of areas for aquatic or other recreational activities. Use of recreational areas on non-federal and federal lands by individuals would continue to be consistent with existing access and would not change. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict recreational activities within the training study area.

The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal. The analysis in the Draft and Final EAs shows that there would be no significant impacts on the Hawaiian monk seal or its critical habitat or other threatened and endangered terrestrial and marine species. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer, and 62 Native Hawaiian Organizations, historic partners, and the public. Correspondence regarding the National Historic Preservation Act Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

5000-45E  
N45  
April 6, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

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SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 19, 2018 comment letter from Carol Hiuton.

Copy to: Hawaii Department of Land and Natural Resources

12-19-18

Carol Hinton  
2781 Kam Victory  
Kaunakakai HI  
96748

Dear Samuel Semmo,

The impact of your planned training on Molokai would have a devastating impact on our local culture of fishing and paddling as well as significant harm to the aquatic environment of the endangered Hawaiian monk seal and all other marine life.

You must stop planning to do this.

Thank you for your kind attention to this matter.

Sincerely,  
CH

DEPT OF LAND & NATURAL RESOURCES  
STATE OF HAWAII  
2018 DEC 21 A 11:15  
OFFICE OF ACTION AND COASTAL LANDS

ENCLOSURE



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 6, 2021

Cheryl Pritchard  
PO Box 1235  
Kaunakakai, HI 96748

Dear Cheryl Pritchard:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act (NEPA) process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. The infrastructure at a pier on a military installation is different than that found at a public marina or pier. The infrastructure at a public facility is more like the type of environment personnel would experience on a mission.

A critical factor of this type of training is navigating the “unknown” when completing a training objective. A variety of sites are therefore needed to ensure that naval special operations trainees can experience site diversity; having multiple site choices also ensures less frequent use of each site. All training activities would be non-invasive in nature and the Navy has no intention or authority to close public beaches.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

The Navy assessed the potential effect of the proposed training on terrestrial and marine biological resources, including the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including the monk seal and its critical habitat. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

As discussed in Section 2.1.1 (Training Activities), all training activities would be non-invasive. Naval Special Warfare Command would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition,

explosive demolitions, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building campfires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity.

The Council on Environmental Quality regulations implementing NEPA (40 Code of Federal Regulations Section 1506.6 (a)), "direct agencies to make diligent effort to involve the public in preparing and implementing their NEPA procedures", however public meetings are not a requirement for EAs. Please see Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EA for a full description of public outreach.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERR  
I.R.1229438  
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Date: 2021.04.06  
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SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: Undated comment letter from Cheryl Pritchard.

Copy to: Hawaii Department of Land and Natural Resources



You are creating bad press for the military

You have not had the common courtesy of holding a meeting here in person on Molokai regarding your plans to do sea training.

It is a continuation of disrespectful behavior. In the past we have been assured that no fly overs would happen in the populated areas. I have been enduring the unwelcome noise and shaking of my home for years now when the military planes regularly fly morning and night.

- Jet skies are illegal inside the reef
- The law should apply to all.
- The area is important habitat for turtles and monk seals.
- we will be blocked from accessing the area during operations
- already the military occupies more than enough land,
- The runaway budget should be cut back
- the military has not cleaned up the mess

that has been left, ~~is~~ unexploded ordnances, from before.

Cheryl Pritchard *(Cheryl Pritchard)*  
 Box 1235  
 Kaimakakai, HI  
 96748

**ENCLOSURE**



**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Artice Sioingle, D. Dunn, and John Wordin (return address not provided)

Dear Artice Sioingle, D. Dunn, and John Wordin:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at:

[https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 18, 2018 comment letter from Artice Sioingle, D. Dunn, and John Wordin.

Copy to: Hawaii Department of Land and Natural Resources

11/8/18

Malokai, Kule O'O - Malokai the island of powerful prayer. Prayers carried on winds released from Hina's gourd. This is the way we have defended ourselves in the past and it will prove the only effective way to prevent harm to our beautiful island and its people.

A vision was given to an elder of the last attack on our island. We lined the shore holding poles with what appeared to be white prayer flags - and we prayed.

Two from the canoe came to shore but when greeted with our energetic field they'd suspect their spears and retreated to the canoe. Those in the canoe dropped their spears and quickly departed.

Perhaps others have had similar visions as our island is known as the place of powerful prayer. In the current situation it is important to remember our reverence for all life and the practice of honoponopono. Our duty is the protection of our environment and to remind those who don't live here that as a First

Nation, a boriginal land cannot be used in any way, that impairs its utility for traditional use by future generations.

It is indeed ironic that the Navy would want to misuse our hereditary rights and responsibilities of ocean management to train the military how to invade our island as if we were the enemy so that they will be prepared - for what? To attack us - to attack others - to be a part of some pre-emptive strike against another.

Our code is love and respect for all life. Our spirit is strong. We understand that all power lies in personal choice - and we know how to use pule o'o to safely bind our island home from harm.

Our prayer flags will appear and we will unite to protect what we love and hold dear.

Archie Swinga  
D. Dunn  
John Worden



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPBH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Elaine Callinan (return address not provided)

Dear Elaine Callinan:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 1, 2019 comment letter from Elaine Callinan.

Copy to: Hawaii Department of Land and Natural Resources

Jan 1, 2019

Your pre-emptive strike of sending Navy seals to invade Molokai, its ocean, shore line, land, people, air and spirit <sup>an act of war</sup> is an act of war against a First Nation people with guaranteed rights of no deprivation of their means of subsistence, enjoyment of their own cultural and traditional way of life, informed consent prior to activities on their lands, and self-representation. Your continued destruction of our island and its resources reveals your lack of respect for our island and us. As our past council representative said "Molokai is the last Hawaiian Island. We live by our Kūpuna's (elders) historic legacy of pūle'ō'ō (powerful prayer)." Our beliefs respect all life - yours do not.

We have spent the last two years working on a community land management plan which you have totally disregarded in your war motivated practices. You jeopardize our way of life, our future generations, and our very ability to survive as Hawaiians. We come to the table in peace with the goal of joint sovereignty - we come in peace, love, and prayer.

Do not think your military tactics will destroy our spirit. We stand with our amānā in the place of pūle'ō'ō. We are united in our belief that spirit will prevail. Elaine Callinan



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBPHH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Jayson Mizula ([soitgoes1984@gn.apc.org](mailto:soitgoes1984@gn.apc.org))

Dear Jayson Mizula:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

Under the Proposed Action, training on Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on Molokai.

Military properties do not provide sufficient varied and diverse locations or environmental features to adequately prepare special operations personnel for the types of environments they may encounter on deployment. Naval Special Warfare Command (NSWC) conducted an extensive search for sites within the training study area that would meet its training requirements and minimize or avoid impacts on the environment or public. As described in Chapter 2 (Description of Proposed Action and Alternatives) of the Draft and Final EAs, each site was specifically researched and evaluated for numerous factors, to include sites suitable for meeting training requirements considering, diversity, complexity and challenge, flexibility, potential impacts on the environment, accessibility, cultural and biological resource site conditions (i.e., scheduled public events or protected species considerations), as well as availability of a site at the time the training would be scheduled to occur. Having a varied selection of sites in an expansive area provides trainers with flexibility to select increasingly complex and challenging locations in order to meet training requirements. Additionally, a wider selection of training sites minimizes the potential for overuse of the areas. This also limits impacts on any one location and allows for maintaining the natural habitat. Training value can be degraded when the same activities are routinely conducted using the same sites.

As specific training activities are scheduled, compatible sites within the training study area would be selected to support each training event. To sustain the highest level of training value and avoid trainee familiarity with specific sites, site selections are made to create the most challenges for the trainees and to be responsive to training needs. Finally, a wide array of training sites more readily allows NSWC to select sites with the goal of separating the military activity from the public, while still meeting its training objectives. Under the Preferred Alternative (Alternative 2) an individual training site may be used up to 10 events/year. However, not all sites within the training study area would be utilized over a 1-year period.

NSWC does not anticipate disruptions to the community, local economy or the environment. The intent of the proposed training is to build trainees' skills, experience, and confidence by challenging them in a location with dynamic weather, varied terrain, and warm-water conditions. As part of the rigorous training, the trainees learn skills needed to avoid detection along with the goal of leaving no trace of their presence during or after training activities. Proposed training would occur only on sites with the permission of landowners or managers (e.g., State Parks, private property owners, etc.). NSWC also coordinates with local police departments and law enforcement prior to conducting training activities.

As discussed in Section 2.1.1 (Training Activities) of the Draft and Final EAs, all training activities would be non-invasive. NSWC would not build training devices or infrastructure at any site during the proposed training activities. The proposed training does not include the use of live-fire ammunition or explosive demolitions, bombing activities, off-road driving, digging, vegetation cutting or removal (with the exception of one federal property location), tree climbing, construction, building camp fires, or leaving human waste at any training site. The intent of naval special operations training activities is for trainees to remain undetected and to leave no trace of their presence during or after the training activity. Disturbances are expected to be short term and infrequent and any potential impacts would be minimal and short term based on the relatively low intensity, localized nature, and infrequent nature of the impacts, and brief duration of the activities.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Section 3.3 of the Final EA has also been revised to include discussion of marine sanctuaries, particularly the Hawaiian Islands Humpback Whale National Marine Sanctuary. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The proposed NSWC activities are similar to recreational and small-scale commercial boating activities, with the added component of the intention to remain undetected and leaving no trace of their presence. Training activities would be conducted in accordance with military training procedures, approved standard operating procedures and protective measures in place to protect marine mammals. These measures are discussed in Section 2.6 (Best Management Practices and Standard Operating Procedures) and Section 3.3 (Biological Resources) of the Draft and Final EAs.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.



The Proposed Action involves minimal use of machinery, equipment, or vehicles; as such, no increases in the amount of hazardous waste produced would be expected. With implementation of Best Management Practices, including compliance with Navy Spill Prevention and Control and Countermeasure plans, hazardous materials and waste would not be released into the environment under the Proposed Action. Military expended materials such as flares and pyrotechnics, propellants, and explosives would not be utilized as part of proposed naval special operations training. Hazardous materials and wastes would not be generated or released into the environment.

As described in the Draft and Final EAs in Section 3.3.3.2.2 (Marine Biological Resources), as a general practice, submersibles and small inflatable boats would be used during the training activities and would be used more on sandy areas, where fewer invertebrates are present and where damage to the vessels could be more readily avoided. Vessels would not be anchored or set down on coral, marine invertebrates, or juvenile fish. Trainees would avoid coral when conducting proposed training activities. The low numbers of trainees walking within intertidal areas would not generate any more turbidity (cloudiness or haziness) than wave action would generate and no discharges of any materials are to be made into the marine environment, thus water quality would not be affected. Proposed training activities would have minimal impacts on marine invertebrates because of the minimally invasive training activities and avoidance measures (e.g., timing of activities to avoid low tides and geographic restrictions on sensitive coral reef areas). Any disturbances from training activities would not be expected to cause long-term or permanent impairment to the surrounding benthic habitats because any damage would likely be very small and localized. The proposed training does not include the introduction of pollutants to the training study area and water quality is not expected to undergo a measurable change due to the Proposed Action.

The proposed training activities do not involve changes to drainage patterns or introduce pollutants to training study area surface waters or groundwater. Water quality is not expected to undergo a measurable impact due to the Proposed Action. In the event of an accident, Commander Navy Region Hawaii would be contacted if a spill of any hazardous substance or oil were to occur into State waters, the ground, or in air, in accordance with the Navy's Oil and Hazardous Substance Integrated Contingency Plan. Commander Navy Region Hawaii would also be contacted if an oil spill occurred that could violate water quality standards, cause a film or sheen or discoloration on the water surface or shoreline, or cause sludge or emulsion to be deposited beneath the surface of the water. Should any spill pose a threat to human health, 911 would be called immediately. Any petroleum-contaminated soil from an accidental spill would be treated, stored, transported, handled, labeled, and disposed of in accordance with federal, state, and local regulations. This ensures safety for the trainees, training vessels, and any commercial and civilian craft that may transit adjacent to the event location.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 6, 2018 comment letter from Jayson Mizula.

5000-45E  
N45  
April 12, 2021

Copy to: Hawaii Department of Land and Natural Resources

From: soitgoes1984@gn.apc.org <soitgoes1984@gn.apc.org>  
Sent: Thursday, December 6, 2018 2:52 PM  
To: Lemmo, Sam J <sam.j.lemmo@hawaii.gov>  
Subject: proposed training on Molokai

Aloha Mr. Lemmo,

I oppose the US Navy's proposal to expand training operations to the shore waters of south Molokai. The US military is the worst polluter on the planet beyond just their consumption of hundreds of thousands of barrels of oil every single day. Their footprint is enormous, operating from 800 bases in close to 100 countries, with personnel deployed to over 150, according to Politico. America is engaged in combat in dozens of these countries, and all out war in over half a dozen. The price tag is in the trillions, and loss of life incalculable if you take into account disease, famine, and poverty that linger long after the bombs stop falling. They're currently training for this in the sky above Molokai and if they have their way, they'll also train in the same place that many people go paddling and fishing. What they train for is the antithesis of aloha.

For good examples of why the military should not be allowed to train here, we don't have to look any further than Kaho'olawe, but Bikini Atoll and Vieques are also prime examples of islands deemed expendable. There's no reason to think Molokai is viewed any different. The military proved this when they turned part of Kalauapapa into the Makanalua Bombing Range back in the 1940's. Medicine was needed then, not bombs. Medicine is what is needed today. Molokai deserves to be healthy but taxes fund war and training and never seem to find their way here in meaningful ways. The military flies in to give out free eye exams and glasses every couple years but people are aware that it's tax dollars paying for it and it's not out of the good of anyone's heart, it's a pr stunt.

Let's not forget that it was the military that painted the huge target that remains on Hawaii's back when they moved the Pacific Fleet here in May of 1940, it was the military that ran the internment camps, and the military that has shown zero respect for Kanaka Maoli and the 'aina. History has taught us that America's interests do not align with Hawaii's, and that's not about to change. As someone who has trained, and followed orders using that training overseas, I oppose the military training anywhere near Molokai. As a resident of Molokai who has been blessed to help take care of this 'aina, I oppose the further desecration of Molokai in any form.

If one single human being, monk seal, sea turtle, fish, bird, bat, or any other living creature is inconvenienced much less displaced or harmed in any way by the navy's proposed training, it should not even be up for debate, it should never be allowed to happen. If they are allowed to train, this is not simply going to go away. Members of this community are not afraid of civil disobedience and either the navy is completely ignorant of history or this is an attempt by the navy at provocation for some reason. The land and waters of Hawaii have already been devastated enough, the Hawaiian people have already suffered enough.

Jayson R. Mizula  
Ho'olehua



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Jessica L. C(not legible). (return address not provided)

Dear Jessica L. C.:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not interfere with public use of water areas for fishing for recreation or food. Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration, and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under "NEPA documents available for public review" at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 1, 2019 comment letter from Jessica L. C(not readable).

Copy to: Hawaii Department of Land and Natural Resources

Jan 1, 2019

Your pre-emptive strike of sending Navy seals to invade Molokai, its ocean, shore line, land, people, air and spirit <sup>on act of war</sup> is an act of war against a First Nation people with guaranteed rights of no deprivation of their means of subsistence, enjoyment of their own cultural and traditional way of life, informed consent prior to activities on their lands, and self-representation. Your continued destruction of our island and its resources reveals your lack of respect for our island and us. As our past council representative said "Molokai is the last Hawaiian Island. We live by our Kūpuna's (elders) historic legacy of pūlo'o (powerful prayer)." Our beliefs respect all life - yours do not.

We have spent the last few years working on a community land management plan which you have totally disregarded in your war motivated practices. You jeopardize our way of life, our future generations, and our very ability to survive as Hawaiians. We come to the table in peace with the goal of joint sovereignty - we come in peace, love, and prayer.

Do not think your military tactics will destroy our spirit. We stand with our amākauna in the plea of pūlo'o. We are united in our belief that spirit will prevail. *Jessica Holt*



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 6, 2021

John Wordin  
PO Box 121  
Kualapuu, HI 96757

Dear John Wordin:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on the Hawaiian monk seal and its designated critical habitat. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on terrestrial or marine biological resources, including the monk seal and its critical habitat. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Final EA has been revised to include discussion of fishing for both recreation and food in Section 3.2 (Land Use - Recreation). Training activities would not impact fish stocks and would not interfere with public use of water areas for fishing for food or recreation. Access to marine areas on non-federal and federal lands would not be changed. Training would be localized, infrequent, brief in duration and consistent with the existing land use. Training would not restrict fishing access or activities within the training study area.


Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

5000-45E  
N45  
April 6, 2021

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R  
.1229438936

A digital signature verification stamp is overlaid on the signature. It contains the text: "Digitally signed by ENG.SHERRI.R.1229438936", "36", "Date: 2021.04.06 15:06:42 -10'00'".

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SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 9, 2018 comment letter from John Wordin.

Copy to: Hawaii Department of Land and Natural Resources



John Wordin  
PO Box 121  
Kualapuu, HI 96757

9 DEC 2018

Mr. John J. Wordin

Dear Mr. Lemmo,

We are opposed to using Moloai as a SEAL training ground. It has seal potential to disrupt Monk Seal critical habitat as well as Hawaiian fishing rights areas.

Sincerely,

John Wordin  
in the Single.

**ENCLOSURE**





**DEPARTMENT OF THE NAVY**

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 6, 2021

Rita Woods  
PO Box 482261  
Kaunakakai, HI 96748

Dear Rita Woods:

**SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII**

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria. The Navy also consulted with the Hawaii State Historic Preservation Officer, and 62 Native Hawaiian Organizations, historic partners, and the public. Correspondence regarding the National Historic Preservation Act Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager, would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

The Navy values your participation in the environmental review process. All comments that have been received will be included in Appendix C (Public Comments and Responses) of the Final EA. Upon completion of the Final EA, a Notice of Availability will be published in local newspapers and in the Office of Environmental Quality Control bulletin *The Environmental Notice* on the Hawaii Department of Health's website.

Sincerely,

ENG.SHERRI.R  
.1229438936

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SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: January 1, 2019 comment letter from Rita Woods.

Copy to: Hawaii Department of Land and Natural Resources

Jan 1, 2019

Your pre-emptive strike of sending Navy seals to invade Molokai, its ocean, shoreline, land, people, air and spirit <sup>an act of war</sup> is an act of war against a First Nation people with guaranteed rights of no deprivation of their means of subsistence, enjoyment of their own cultural and traditional way of life, informed consent prior to activities on their lands, and self-representation. Your continued destruction of our island and its resources reveals your lack of respect for our island and us. As our past council representative said "Molokai is the last Hawaiian Island. We live by our Kamehameha's (elders) historic legacy of pule o'o (powerful prayer)." Our beliefs respect all life - yours do not.

We have spent the last two years working on a community land management plan which you have totally disregarded in your war motivated practices. You jeopardize our way of life, our future generations, and our very ability to survive as Hawaiians. We come to the table in peace with the goal of joint sovereignty - we come in peace, love, and prayer.

Do not think your military tactics will destroy our spirit. We stand with our amakua in the place of pule o'o. We are united in our belief that spirit will prevail. Rita (Wood)

ENCLOSURE



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Kanoelani Davis  
PO Box 482278  
Kaunakakai, HI 96748

Dear Kanoelani Davis:

### SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and is included in Appendix C (Public Comments and Responses) of the Final EA.

The Navy assessed the potential effect of the proposed training on marine and terrestrial biological resources. As the analysis in the Draft and Final EAs shows, there would be no significant impacts on these resources. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy's potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence) of the Final EA.

The Navy utilized the best available science to identify the cultural resources, including traditional cultural properties, in the training study area. Please refer to Section 3.4 (Cultural Resources) for a full analysis of historic properties, which are cultural resources that include prehistoric and historic districts, sites, buildings, structures, or objects included in, or eligible for inclusion in, the National Register of Historic Places including properties of traditional religious and cultural importance to Native Hawaiian Organizations that meet the National Register Criteria.

The Navy also consulted with the Hawaii State Historic Preservation Officer (SHPO), and 62 Native Hawaiian Organizations, historic partners, and the public. The Navy determined that the proposed undertaking for the Naval Special Warfare Command (NSWC) to conduct land, maritime, and air-based training activities in the State of Hawaii will result in no historic properties affected in accordance with Section 106 of the National Historic Preservation Act (NHPA). The SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the NHPA Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Under the Proposed Action, training on the Island of Molokai would only occur in two water-based training study areas where a right of entry permit, or other real estate agreement with a willing property owner or property manager would be obtained. No land-based or air-based training is proposed on the Island of Molokai, as proposed training is limited to water-based training activities. The purple area depicted on the maps in the Draft and Final EAs is a Study Area.

During the development of the alternatives, NSWC considered three training area screening factors (training, safety, and logistics) when identifying an area that could support warm weather naval special operations training and satisfy the training requirements as described in Section 2.4 (Training Area Screening Factors). Following the review of the screening factors, it was determined that the training study area in the State of Hawaii fulfills all of the beginning/intermediate, warm weather maritime climate requirements prior to advancing to more challenging (colder weather) environments. In addition to meeting the training requirements, the safety and logistical training area screening factors presented in Section 2.4 (Training Area Screening Factors) are also satisfied by training in the State of Hawaii. Thus, the State of Hawaii fully satisfies all three training area screening factors and is considered the only feasible warm weather maritime location for training naval special operations personnel. The Navy is not proposing to turn natural spaces into militarized regions. The proposed NSWC activities are similar to hiking, swimming, and camping, with the added component of the intention of trainees to remain undetected and leaving no trace of their presence.

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 5, 2018 comment letter from Kanoelani Davis.

Copy to: Hawaii Department of Land and Natural Resources

**From:** Kanoelani Davis <molokainuiahina@gmail.com>  
**Sent:** Wednesday, December 5, 2018 7:29 PM  
**To:** NFPAC-Receive  
**Subject:** [Non-DoD Source] OPPOSITION TO MILITARY EXERCISES ON MOLOKAI

To whom it may concern:

On behalf of myself, Kanoelani Davis, and my family Miliopuna Davis and Kū Chin, we are in great opposition to the U.S. Navy training exercises in the nearshore waters and above land of the island of Molokai.

This negatively disturbs and impacts our wildlife and fisheries, as well as cultural sites that are found in the ocean, near the shore from Heiau, fishponds, sacred fishing grounds for ceremonial uses. All this information can be found in archeological findings, in the Molokai ranch findings and EIS created in these areas.

There is no reason or necessity to do such training on our island. There is no reason that the military should be exempt from EIS or any other grounds of exceptions. There also needs to be recognition of Native Hawaiian rights as the military and government are improperly both utilizing and enforcing laws that do not pertain to the Native Hawaiians. Please recognize that.

I am here to state that this is against all of our beliefs and cultural and spiritual practices as indigenous people of this land and we follow the laws of the 8 realms that we have responsibilities to as far as we can see.

Sincerely,  
Kanoelani Davis  
PO Box 482278  
Kaunakakai, HI 96748



## DEPARTMENT OF THE NAVY

COMMANDER  
NAVY REGION HAWAII  
850 TICONDEROGA ST STE 110  
JBP HH, HAWAII 96860-5101

5000-45E  
N45  
April 12, 2021

Georgette A. Yaindl ([gyaindl@gmail.com](mailto:gyaindl@gmail.com))

Dear Georgette Yaindl:

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (EA) FOR NAVAL SPECIAL OPERATIONS TRAINING IN THE STATE OF HAWAII

Thank you for participating in the National Environmental Policy Act process. Your comment letter has been received and included in Appendix C (Public Comments and Responses) of the Final EA.

Section 1.6 and Table 5-1 (Principal Federal and State Laws Applicable to the Proposed Action) in Section 5.1 (Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions), have been updated to provide the list of applicable Hawaii Revised Statutes (HRS) and Hawaii Administrative Rules (HAR), including HRS Chapter 343, *Environmental Impact Statements*; HAR Chapter 11-200, *Environmental Impact Statement Rules*; HRS Chapter 6E, *Historic Preservation*; HRS Chapter 195D, *Conservation of Aquatic Life, Wildlife, and Land Plants*; HAR Chapter 13-107, *Threatened and Endangered Plants*; and HAR Chapter 13-124, *Indigenous Wildlife, Endangered and Threatened Wildlife, Injurious Wildlife, Introduced Wild Birds, and Introduced Wildlife*.

In accordance with HAR Sections 11-200-9 and 11-200-10, the Navy anticipates a Finding of No Significant Impact (AFONSI) for the proposed action and prepared a Draft EA. In accordance with HAR 11-200-9, the proposing agency shall “[s]eek, *at the earliest practicable time*, the advice and input of the county agency responsible for implanting the county’s general plan for each county in which the proposed action is to occur, and consult with other agencies having jurisdiction or expertise as well as those citizen groups and individuals which the proposing agency reasonably believes to be affected” (emphasis added). A total of 13 agencies (which includes State of Hawaii, county, and city) were consulted with prior to the issuance of the Draft EA. Five county and state agencies and approximately 7,500 citizens, including 5 petitions or form letters, commented on the Draft EA. All comments are considered in preparation of the Final EA (i.e., information obtained about resources, potential impacts, issues and areas of concern, etc.). The complete list of parties consulted with and/or parties that provided comments on the Draft EA is provided in Appendix C (Public Comments and Responses) of the Final EA.

All training would be conducted in accordance with natural resource management plans applicable to the landownership: for the Navy-owned lands, Integrated Natural Resource Management Plans would be followed; for State or County lands, management plans would be followed; and private lands would be subject to right of entry permits, or other real estate agreements. The Final EA has been revised to include discussion of marine sanctuaries in Section 3.3 (Biological Resources). As the analysis in the Draft and Final EAs shows, there would be no significant impacts on marine and terrestrial biological resources with implementation of the proposed action. The Navy has consulted with the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) for the Proposed Action, and the same conclusion was reached. Please refer to Section 3.3 (Biological Resources) for a full analysis of the Navy’s potential impacts on biological resources. Correspondence regarding consultations with the USFWS and NMFS is presented in Appendix A (Agency Correspondence).

At the time of the Draft EA, the Navy, on behalf of Naval Special Warfare Command (NSWC), initiated consultations on the Proposed Action with the Advisory Council on Historic Preservation, the Hawaii State Historic Preservation Officer (SHPO), the National Park Service, and 62 Native Hawaiian Organizations, historic partners, and the public. Consultation letters were sent in August 2018 and then again in March 2019. The Navy concluded responsibilities under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking, and adequately documented its finding of effect and fulfilled the agency official's responsibilities under Section 106. The Navy determined that the proposed undertaking for the NSWC to conduct land, maritime, and air-based training activities in the State of Hawaii would result in no historic properties affected in accordance with NHPA Section 106 Implementing Regulations at 36 Code of Federal Regulations (CFR) 800.4(d)(1). The Hawaii SHPO has concurred with a Finding of No Adverse Effect and the Navy's Section 106 requirements have been completed. Correspondence regarding the Section 106 consultation effort is presented in Appendix A (Agency Correspondence) of the Final EA.

Consultation has also been completed with the State of Hawaii Office of Planning for Coastal Zone Management Act compliance. Please see Appendix A (Agency Correspondence) of the Final EA for associated correspondence and consultation documents.

The Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Section 1506.6) direct agencies to involve the public in preparing and implementing their NEPA procedures. State regulations require a notice in the Hawaii Office of Environmental Quality Control bulletin *The Environmental Notice* (HAR Section 11-200-3). NSWC published a Notice of Availability of the Draft EA for three consecutive days in the Honolulu Star Advertiser, Maui News and West Hawaii Today, from November 8 through November 10, 2018, and once in the Hawaii Office of Environmental Quality Control bulletin, *The Environmental Notice*, on November 8, 2018. The notice described the Proposed Action, solicited public comments on the Draft EA, provided dates of the public comment period, and announced that a copy of the Draft EA would be available for a 30-day review (November 8, 2018 through December 10, 2018). Following receipt of comment period extension requests, the Navy extended the public comment period another 30 days, to close on January 7, 2019. The Navy issued a press release on December 6, 2018 and notice was provided in *The Environmental Notice* on December 8, 2018 announcing the comment period extension. The Draft EA was made available online and copies were placed in the following public libraries:

- Oahu: Hawaii State Library, 478 S. King Street, Honolulu, HI 96813
- Kauai: Waimea Public Library, 9750 Kaunualii Hwy, Waimea, HI 96796
- Hawaii Island: Kailua-Kona Public Library, 75-138 Hualalai Rd, Kailua-Kona, HI 96740
- Maui: Kahului Public Library, 90 School St, Kahului, HI 96732
- Molokai: Molokai Public Library, 15 Ala Malama Ave, Kaunakakai, HI 96748

The Notice of Availability also included a solicitation for individuals or organizations interested in participating in the NHPA Section 106 process: "Concurrent with the National Environmental Policy Act (NEPA) process, the Navy is conducting National Historic Preservation Act Section 106 consultations regarding potential effects of the Proposed Action on historic properties. NSWC has determined that the naval special operations training is considered an undertaking as defined in the National Historic Preservation Act 36 CFR §800.16(y) and has the potential to cause effects on historic properties. Pursuant to 36 CFR §800.2(d), 800.3(b), and 800.3(e), the Navy is soliciting members of the Public who wish to participate as consulting parties in the National Historic Preservation Act Section 106 process associated with this Undertaking. If interested in participating, provide written notification at the email or physical addresses below within 30 days of this notice."

5000-45E  
N45  
April 12, 2021

The Navy values your participation in the environmental review process. All comments that have been received are included in Appendix C (Public Comments and Responses) of the Final EA. The Final EA for Naval Special Operations Training, State of Hawaii is available at: [https://www.navfac.navy.mil/navfac\\_worldwide/pacific/about\\_us/national-environmental-policy-act--nepa--information.html](https://www.navfac.navy.mil/navfac_worldwide/pacific/about_us/national-environmental-policy-act--nepa--information.html) under “NEPA documents available for public review” at the bottom of the page.

Sincerely,

SHERRI R. ENG  
Director  
Regional Environmental Department  
By direction of the Commander

Enclosure: December 10, 2018 comment letter from Georgette A. Yaindl.

Copy to: Hawaii Department of Land and Natural Resources



The Law Office of Georgette A. Yaindl, LLLC  
 P.O. Box 307  
 Kailua-Kona Hawai'i 96745-0307  
 (808) 224-0219 v/txt  
 (877) 300-8869 fax  
 gyaindl@gmail.com

DATE: December 10, 2018

TO: Naval Facilities Engineering Command, Pacific  
 Attention: Project Manager, EV21.JZ  
 258 Makalapa Drive, Ste. 100  
 Pearl Harbor, HI 96860-3134  
 via email to NFPAC-Receive@navy.mil

Samuel Lemmo  
 Office of Conservation and Coastal Lands Administrator  
 Dept. of Land and Natural Resources  
 State of Hawai'i  
 1151 Punchbowl St., Room 131  
 Honolulu, HI 96813  
 via email to sam.i.lemmo@hawaii.gov

Meagan Ostrem  
 ManTech International Corporation  
 420 Stevens Ave., Suite 300  
 Sojana Beach, CA 92075  
 via email to Meagan.ostems@mantech.com

FROM: Georgette Anne Yaindl

RE: DEA-AFONSI for Naval Special Operations Training in the State of  
 Hawai'i; Various Locations, State of Hawai'i; TMK: Various Locations  
 (Upland and Submerged Lands of the State), published November 8, 2018

Here is my comment for your consideration in preparation of the Final Environmental Assessment for the proposed action titled above.

**The DEA/AFONSI does not meet the requirements of chapter 343 ("Environmental Impact Statements"), of the Hawaii Revised Statutes, as amended, or implementing regulations located at chapter 11-200, of the Hawai'i Administrative Rules, as amended.**

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At the outset the DEA states that it is prepared “in accordance with Hawaii Revised Statutes (HRS) [chapter] 343,” at Abstract, and later lists HRS chapter 343 under “relevant law and regulations”, at §1.6. But that is the entirety of the discussion of state of Hawaii environmental impact statement law in the DEA.<sup>1</sup>

The DEA recognizes that because it is not an action proposed by a state or county agency it therefore is classified as an “applicant action” not an “agency action”, see. e.g., “Applicant: Naval Special Warfare Command”, Applicant Publication Form, at 1. The DEA identifies the Dept. of Land and Natural Resources, of the State of Hawai`i (DLNR) as the environmental review “Approving Agency”, Id..

Under state law,

the approving agency shall . . . [r]equire the applicant, at the earliest practicable time, to seek the advice and input of the lead county agency responsible for implementing the county’s general plan for each county in which the proposed action is to occur, and consult with other agencies having jurisdiction or expertise as well as those citizen groups and individuals which the approving agency reasonably believes to be affected[.]

HAR § 11-200-9(b)(1).

It is clear from the DEA that the Applicant did not comply with this “early consultation” requirement under state law. Not only did the Applicant and/or apparently the Approving Agency wholesale fail to identify and ensure Applicant consultation with individuals and citizen groups that might reasonably be believed to be affected by the project, e.g., without limitation, surfers, swimmers, life guards, outrigger halau, chambers of commerce, cruise ships, hotels, or property owners, but Applicant acted to publish the DEA and make its AFONSI determination before it had received consultation from *any* agency, entity, or individual at all. To wit:

The Navy, on behalf of NSWC, *has initiated* consultation with the U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS), and the State Historic Preservation Division (SHPD). Informal consultation with the USFWS under

<sup>1</sup> In addition, Section 5.1 of the DEA, entitled “Consistency with Other Federal, State, and Local Laws, Plans, Policies and Requisitions” includes “Table 5-1: Principal Federal and State Laws Applicable to the Proposed Action”. The table lists and describes 8 federal acts; 3 state of Hawai`i acts; 4 chapters of Hawai`i Administrative Rules; and 4 federal Executive Orders. HRS chapter 343 and HAR chapter 13-200 are not included in the table.

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section 7 of the Endangered Species Act (ESA) *is in progress* to address the potential effects of the Preferred Alternative on ESA-listed terrestrial species and associated designated critical habitat. Informal consultation with NMFS under section 7 of the ESA and the Magnuson-Stevens Fishery Conservation and Management Act *is in progress* to address the potential effects of the Preferred Alternative on ESA-listed marine species and associated critical habitat and Essential Fish Habitat (EFH), respectively. Consultation under Section 106 of the National Historic Preservation Act (NHPA) *is in progress* with SHPD to assess the effects of the proposed action on historic properties. The Section 106 consultation includes coordination with Native Hawaiian organizations. The Navy does not anticipate any adverse effects to historic properties in accordance with the Section 106 Implementing Regulations.

ES.4; same at 1.7 (emphasis added).

Further, the DEA acknowledges, “As a federal agency, [Applicant] is required to determine whether its proposed activities would affect the coastal zone. This takes the form of a consistency determination, a negative determination, or a determination that no further action is necessary,” at § 3.2.1. “Federal project areas that are not covered by the Navy/Marine Corps *De Minimis* List will be evaluated by the Hawaii Coastal Zone Management Program via a Negative Determination. The Navy will complete a Federal Consistency Determination for activities that will occur on non-federal lands.” § 3.2.2.5 (emphasis added).

Whereas, Applicant is required under state law to have made its AFONSI determination *after* Applicant has consulted with: “[ (1) ] the lead county agency responsible for implementing the county’s general plan for each county in which the proposed action is to occur . . . [ (2) ] other agencies having jurisdiction or expertise . . . and [ (3) ] citizen groups and individuals which the approving agency reasonably believes to be affected by the proposed project”, HAR § 11-200-9(b)(1), and Applicant did not consult with *any* agency, individual, or citizen group in preparation of the DEA or determination of the AFONSI; and whereas, the DEA recognizes that the proposed action is subject to numerous additional reviews by various federal and state agencies for permits, easements, and other permissions but contains no statements that any such reviews are even scheduled, let alone likely to be determined in Applicant’s favor as authorizing the proposed action, the DEA therefore is fatally insufficient, the AFONSI, completely unsupported, and it is right and appropriate that Applicant withdraw the DEA-AFONSI, published November 8, 2018.

Submitted this 10th day of December 2018.

/s/ Georgette Anne Yaindl  
Georgette A. Yaindl

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**C.11 Additional Coordination with Interested Stakeholders**

In addition to the public comments and stakeholder coordination meetings that are summarized in the previous sections of this appendix, five stakeholders were contacted regarding their concerns and questions regarding the proposed Naval Special Operations training in Hawaii. Teleconference meetings were held with the stakeholders on August 19, September 16 and 23, and October 13, 2020. Meeting notes from these calls are presented below.

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII  
ENVIRONMENTAL ASSESSMENT (EA)  
STAKEHOLDER CONSULTATION MEETING  
MEETING NOTES**

**Date:** Wednesday, August 19, 2020

**Time:** 0845-1100 (Hawaii time)

**Location:** Teleconference

**ATTENDEES**

| <i>NAME*</i>                                                        | <i>ORGANIZATION*</i>              |
|---------------------------------------------------------------------|-----------------------------------|
| Aunty Kehaulani Lum (KL), President                                 | Ali'i Pauahi Hawaiian Civic Club  |
| M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator | Naval Special Warfare Group THREE |
| C. Rasmussen (CR), Archaeologist                                    | NAVFAC Pacific                    |

*Notes: \*NAVFAC = Naval Facilities Engineering Command; PM = Project Manager.*

**Purpose**

The purpose of the call is to enquire if there are any questions or concerns related to the Draft EA for NSO Training in Hawaii, particularly with respect to cultural resources.

**KL:** Started with providing the need for an ole, which she then performed after which CR and MP respectfully entered the fishpond area. We sat down and proceeded to listen to KL explain the significance of the fishpond, Pa'aia, which is located in Pearl Harbor. There were once about 23 fishponds in Pearl Harbor, three of which remain. The others have been buried or filled in for development. Pa'aia is one of three fishponds built by built by Queen Kalai-Manuia and the only fishpond not filled in. The founder of the fishpond was a female ruler of Oahu Queen Kalai-Manuia, who reigned in peace for over 65 years. Queen Kalai-Manuia was the daughter of Kukaniloko, the first Moi Wahine and a Maui chief named Luaia. Queen Kalai-Manuia was born at the birthing stone at Kukaniloko, on the way to the North Shore. The Queen moved her court from central Oahu to Pearl Harbor and with her husband who was from Maui built Loko Pa'aiau. This was done 500-600 years ago. Only people within the queen's retinue could enter the fishpond area. Noted that the queen's father, Luaia, was the one who had created the ahupua'a, land divisions that provided resources from the mountain to the ocean. It provided access to water.

Loko Pa'aia is located within Kalauao Ahupua'a. There were several other ahupua'a within the vicinity of the fishpond, including Honouliuli, Hō'ae'ae, Waikele, Waipi'o, Waiawa, Mānana, Waimano, Waiiau, Waimalu, Kalauao, 'Aiea, Hālawa, which are within the traditional district of 'Ewa. The place name for Loko Pa'aia is unknown, however it likely pertains to healing. Stressed was the importance of peace, a place of healing, and a place of sustenance for the Hawaiian people within this area of Oahu.

**MP:** Asked about how far did the fishpond extend and where the original walls visible anywhere.

**KL:** Explained the fishpond extended out to McGrew Point and she was hoping to have the Navy offer to do underwater photographs to determine how much if any of the original fishpond remained, indicating that some of the rocks from the fishpond wall may be under the water; some of the rocks may have been used in the wall across the water where the ca. 1960s houses are located.

**CR:** Mentioned the underwater surveys that had been done in this area using sidescan sonar and agreed to research this information and share it with KL. **MP:** Spoke about the possible shifting of the harbor floor due to past storms. Mentioned that as the harbor was an enclosed one perhaps the rocks had not moved around that much.

**MP:** Mentioned that perhaps Navy divers would be interested in doing the survey for this endeavor.

**KL:** Noted that the wildlife was beginning to come back to the fishpond. There were more fish and more birds. The gray heron, or 'auku'u and the ae'o could be seen around the pond. The Kumulipo, the Hawaiian

creation chant, tell the story of creation as seen by Hawaiians, going back in history to a time before people. It says that for every creature in the water there is a creature on land. For instance, the small striped fish, the Manini has the equivalent on land, a striped dragonfly flew by, and KL indicated it was the spirit of King Kamehameha. Because of the healing powers of the area, a healing ahu was being built on the other side of the fishpond so that people could go there and reflect and heal themselves. They could help rebuild the fishpond by moving one of the rocks into position on the wall.

**KL:** Thanked everyone and MP replied there was no need for thank you just yet as nothing had occurred.

**MP:** Described the nature of the training and provided maps of the various areas within the harbor training could occur stressing the non-invasiveness of the training.

**KL:** Asked if the Navy could take a moment of reflection prior to entering the water.

**MP:** We could possibly write it into the training scenario.

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII  
ENVIRONMENTAL ASSESSMENT (EA)  
STAKEHOLDER CONSULTATION MEETING  
MEETING NOTES**

**Date:** Wednesday, August 19, 2020

**Time:** 1105-1128 (Hawaii time)

**Location:** Teleconference

**ATTENDEES**

| <i>NAME*</i>                                                        | <i>ORGANIZATION*</i>              |
|---------------------------------------------------------------------|-----------------------------------|
| M. Vincent (MV), President                                          | Kawaihae Canoe Club               |
| M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator | Naval Special Warfare Group THREE |
| C. Rasmussen (CR), Archaeologist                                    | NAVFAC Pacific                    |

*Notes: \*NAVFAC = Naval Facilities Engineering Command; PM = Project Manager.*

**Purpose**

The purpose of the call is to enquire if there are any questions or concerns related to the Draft EA for NSO Training in Hawaii, particularly with respect to cultural resources.

**MP:** Called Mr. Vincent and introduced Ms. C. Rasmussen and herself. Then went into proposed project, which is to support Naval Special Operations training throughout Hawaii to include the neighboring islands. The goal of the training is to leave no trace of the training while it's being conducted and after it has been completed. What looks on paper to be many areas once shrinks when you take the following considerations prior to selecting a site to train on:

- 1) Must take seasonal currents/tides into play at certain times of the year certain areas are not easily accessible.
- 2) Must look at what is going on in a particular area to see if there are seal pups nearby, honu (turtles), nesting areas, canoe regattas or other activities occurring. If so then area is off limits for training.
- 3) A variety of areas are needed so that training does not become stale.
- 4) A variety of areas are needed so training does not occur let's say 50 times at one site, which could then perhaps begin to impact the site.
- 5) Only three sites proposed for the Big Island; Kawaihae Harbor, Honokohau Harbor, and Mahukona Beach Park.

Only use of boat ramp and water-based training is proposed for Kawaihae Harbor. The training will not shut down access to others who are utilizing the area. No closures proposed, public not to be denied access to area. A typical training scenario would be about two small 25 foot or less support boats with up to 7 people on board, one of which is a marine mammal lookout. The mammal lookout takes annual training to do this. The purpose of the crew of one boat is to watch the training area to ensure no one interferes with the training. If a fisherman or canoe enters the training area, the navy crew would watch the progress of the fisherman or canoe; if they started to get close to the trainees, the lookout boat would approach the fisherman or canoe. The training boats follow all US Coast Guard procedures; they would inform the fisherman or canoe crew that Navy training is taking place and ask if they could stop their transit. If the response is no, the Navy would then either stop their training and wait until the public transits the area or the Navy would stop the training altogether and move to another site. Most training will take place between dusk to dawn and perhaps 2-4 times per year. The EA does say up to 10 times; however, we do not anticipate reaching this number anytime soon. There may be some years where the Navy will not utilize the training site at all. It all depends on our training requirement. Note that the training will typically be launched from a small vessel from the ocean. There is no life fire, no air operations, no digging, no bonfires involved in

the training proposed for the Big Island. Additionally, we can only conduct the training that is mentioned for these areas. If, at a later date, the Navy would like to introduce a new training activity on the island of Hawaii then a new proposal would need to be made.

**VM:** The canoe club has about 200 members who utilize the smaller, older harbor. Their season is from Feb to Oct from 6:00 a.m. to 6:00 p.m. daily with between 5 and 12 canoes in the water at any one time. The paddlers paddle all the time, school groups, adults when not at work, retirees, whenever they can get in the water. The club's training area ranges from Mahukona to Kawaihae to 'Anaeho'omalu Beach (?) to Upolu Point (?). There is a long-distance paddling event held in May. The area is a pristine fishing ground in which subsistence fishing is also done. About 100 yards from the shoreline whales can be found lying in the sand pockets along the shore, and sometimes these whales are very deep into the water. This area from Kawaihae to Mahukona is not beach but all cliffs. Were State of Hawaii and County Officials aware of this Navy proposal? He had heard something about this perhaps 2 years ago. He served in the USMC at the age of 19 and went to 8 weeks of boot camp vice the normal longer 16 weeks as he was shipped out to Korea and fought in the Korean war.

**MP:** Mentioned that there were several SEAL team members who are from Hawaii currently on the team and in fact one has family on the island of Hawaii that goes back 200 years. State of Hawaii officials were briefed concerning this proposal along with the Mayor of the island of Hawaii and we were working with Hawaii County officials concerning this proposal. Also mentioned that Ms. Rasmussen had done archeological surveys of the area including in the waters off Mahukona and it was determined that there would be no adverse effect to the historic properties done by the proposed training action. The Navy trainees would not be noticed and would not be disruptive. Are there any other concerns regarding cultural practices that we need to be aware of?

**VM:** No. Indicated that he had explained what they did.

**MP:** We would make a notation should we receive permission to train at Kawaihae about the canoe club, its training hours and POCs. We then thanked Mr. Vincent and the call ended.



**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII  
ENVIRONMENTAL ASSESSMENT (EA)  
STAKEHOLDER CONSULTATION MEETING  
MEETING NOTES**

**Date:** Wednesday, September 16, 2020

**Time:** 1000-1115 (Hawaii time)

**Location:** Teleconference

**ATTENDEES**

| <i>NAME*</i>                                                        | <i>ORGANIZATION*</i>              |
|---------------------------------------------------------------------|-----------------------------------|
| K. Markell (KM)                                                     | Office of Hawaiian Affairs (OHA)  |
| K. Ferreira (KF)                                                    |                                   |
| M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator | Naval Special Warfare Group THREE |
| C. Rasmussen (CR), Archaeologist                                    | NAVFAC Pacific                    |
| J. Bigay (JB), PM and NEPA Planner                                  | NAVFAC Pacific                    |

*Notes:* \*NAVFAC = Naval Facilities Engineering Command; NEPA = National Environmental Policy Act; PM = Project Manager.

**Purpose**

The purpose of the call is to coordinate with interested parties and stakeholders regarding the proposed NSO Training in Hawaii.

**CR:** Presented project overview.

**KM:** Would training occur only at night or would there be any daytime training.

**JB:** Training would primarily take place between sunset and sunrise.

**MP** (joined at 1016): Training could involve some places where the trainees could be on land overnight.

**KM:** Where are training sites located?

**MP:** Various sites, depending on conditions, training profile, so as many sites as we can identify, for the variability desired. There is a need for variety as certain sites may have seasonal constraints that would limit our proposed access to them. Therefore, once these constraints are factored in, the number of sites from which to select for our training scenario would be significantly reduced. Constraints such as seal pupping season, honu nesting, surf conditions, perhaps even a canoe regatta scheduled at a site, are examples of constraints. Please know that SEALs have been training in Hawaii for 30 years, mostly unseen by the public.

**KM:** What is the inland extent of the training?

**MP:** Summarized the proposed training scenario (submersible use, divers exit submersible, swim ashore, return to submersible, etc.); there could be places such as Kaena Pt. Satellite Tracking Station (KPSTS) where trainees may swim ashore, enter a vehicle and drive to KPSTS, hike inland, and stay overnight to do surveillance/recon efforts.

**KM:** What about the training cadre that came ashore and the potential for civilians might stumble upon the trainees while night fishing or diving. It is a main concern for OHA that their beneficiaries practicing subsistence gathering not be prevented from doing so. Also of concern is trainee “footprint” and cultural resources.

**MP:** Explained that even places such as Ala Moana Beach Park and Kailua Beach may be training sites, depending on the particular training scenario in use. The intent is not to deny access to the public, nor to limit access to the public, but to utilize the site mainly when it is closed to the public or at odd hours. The training cadre will typically visit a site 2 hours before the training takes place to ensure that there are no

unforeseen issues with the use of the site. For example, if there happens to be camping at the site, then the training would shift to another area or could be canceled entirely.

For water-based training there are two small boats less than 25 feet in length that accompany the trainees; one boat and its occupants are responsible for monitoring the waters to ensure safety; and the second boat monitors the trainees. Should a fishing boat start to transit into the training area, the monitoring boat would watch to determine if the fishing boat is simply traversing the area that will not impact training, in which case the training would continue. If instead, the fishing boat is headed directly toward the trainees, then our monitoring boat would ask the fishing boat users to hold-up while training is in progress. If the fisherman say they cannot hold up and must proceed, then our training would either stop while the fishermen are in the area, move to another area, or stop altogether. Also, during a consultation with an NHO, we were asked if we could incorporate at the beginning of training a “moment of silence” to honor the past and ancestors, before proceeding with training. We could easily incorporate this into our training as our trainees are watermen with a respect for the water.

**CR:** We worked hard on keeping areas of known cultural resources (e.g., National Parks) out of the training scenarios.

**KM:** Does KF have any questions?

**KF:** None – found the discussion interesting regarding how the SEALs train.

**KM:** Reiterated KF’s comment that the discussion had been helpful in allowing them to understand the training and the EA process. He noted, with respect to local fishponds, he was glad to hear that we would incorporate a “moment of silence” to honor the past and ancestors, before proceeding with water based training.

**MP:** Noted that the Navy could potentially ask OHA assistance should OHA beneficiaries complain about the Navy training. Interesting to note the Hawaiians were a water-based warrior culture as is the command that is proposing this training. Currently there are several people from Hawaii on the team as they are noted watermen.

**KM:** Noted that some OHA beneficiaries might balk at OHA speaking for the training, presumably because it would be seen as supporting the military. He mentioned items such as the importance, in Hawaiian culture, of the sea/land boundary, freshwater/saltwater boundary, healing powers of the ocean, limu [common edible seaweed], and was encouraged that the SEAL trainees would be aware of these concepts and accordingly understand and respect Hawaiian culture and beliefs. He stated that he and KF now have a much better understanding of the proposed training than before this conversation.

**CR:** Is there anything else that the OHA representatives might need from us as the consultation proceeds?

**KM:** Some of the proposed training areas, such as Bellows, Kaneohe, and Schofield, are also among Hawaiian’s most sacred areas and offered input and guidance from OHA regarding Hawaiian issues. Overall, he felt comfortable with what they had heard. KF agreed.

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII  
ENVIRONMENTAL ASSESSMENT (EA)  
STAKEHOLDER CONSULTATION MEETING  
MEETING NOTES**

**Date:** Wednesday, September 23, 2020

**Time:** 1000-1030 (Hawaii time)

**Location:** Teleconference

**ATTENDEES**

| <i>NAME*</i>                                                        | <i>ORGANIZATION*</i>              |
|---------------------------------------------------------------------|-----------------------------------|
| B. Shontell (BS)                                                    | Surety Kohala                     |
| M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator | Naval Special Warfare Group THREE |
| C. Rasmussen, Archaeologist                                         | NAVFAC Pacific                    |

*Notes:* \*NAVFAC = Naval Facilities Engineering Command; PM = Project Manager.

**Purpose**

The purpose of the call is to coordinate with interested parties and stakeholders regarding the proposed NSO Training in Hawaii, particularly any concerns or questions regarding the potential use of Mahukona Beach Park, Hawaii Island. The meeting was held per requests by State Rep. Tarnas and Ms. Cathy Gewecke at DAR.

**BS:** I am a long time Kohala resident born and raised. My dad was in the military - he was originally from Providence, Rhode Island; my mother is Hawaiian so I am half Hawaiian, and as a child lived in different areas of the world. My mother's family has been on the Big Island for a long time. I have held a commercial fisherman's license since the 1970s and have been working for various landowners starting from the Kohala Sugar Plantation through Kohala Surety. I have seen articles about the proposed training and am not opposed to it. The company used to own about 600 acres around Mahukona and this was sold and is now held by the Hawaiian Island Trust who has been trying to sell the property for the last 7½ years. The Na Kalai Waa Moku o Hawaii is an organization that has been interested in purchasing the Mahukona property. There have been many others interested in purchasing the property over the years and they come and go. There are about 153 archeological sites around Mahukona on private property. Also, there is a heiau for voyaging and navigation, located nearby. It is related to two other heiau along the Kona Coast.

**MP:** Let me explain where we are proposing to train and what type of training we are proposing to conduct. We are hoping to utilize Honokohau and Kawaihae harbors only for water-based training activities; diver/swimmer and launch and recovery from a submersible. At Mahukona we would also like to conduct an over-the-beach activity. The type of training we are proposing is low impact and it is similar to the types of public activities that are already taking place in these areas. The goal of our training is to leave no trace of the training after we have left the area. So, no digging, no bonfires, no cutting of vegetation, no live fire, and we are not seeking to close off any areas from public access while the training is taking place. Proposed training would typically take place between dusk and dawn usually between 2400 and 0400. We state in our proposal that there will be no more than 10 events per year, however we don't anticipate reaching that number anytime soon and there will be years where no training will occur at all at these proposed sites.

**BS:** At Mahukona, the boating and fishing activities have been reduced to almost none but what is taking place is swimming; people mostly from Marin County, who now live in the area, are swimming 1/4 or 1/2 mile. There are a fair number of people at Mahukona now. The wharf is falling apart, the pavilion is in a decrepit state, and the grassed areas are mostly weeds and rocks. It would be nice if the military could offer to repair a few of these items - it could go a long way with the community. It would bring such goodwill to the area.

**CR:** I am familiar with the area as I conducted archeological surveys along the Kona coast and even worked on an underwater project at Mahukona.

**MP:** Regarding our training, typically accompanying each submersible there will be two boats less than 25 feet in length. One boat will keep an eye on the submersible, which will have a buoy attached to it so that it can be followed and the other boat will keep an eye for boaters, swimmers, paddlers, etc. Should someone venture into the training area, the observation boat and its crew would monitor whomever is entering the area and if they are just transiting through and not close to the trainees the training would proceed. If, however, it appears that the public is getting too close to the training activity, the monitoring crew would respectfully ask that the public stop a moment until the training is completed or has moved away. If the response from the public is no, "I must proceed now," then the training activity would either stop and wait for the public to transit the area, or would stop completely or move to another area.

**BS:** These areas are used during the daytime by the public.

**MP:** The proposed training would occur from 1800-0400 (usually between 2400 and 0400) and we are looking to train in areas that have different infrastructure from a military installation. As we need variety and the ability to learn to move in and out of an area and remain undetected, it is an important aspect to our training. Interesting to note that the Hawaiians were a warrior-based water culture as are we; we recruit well from Hawaii so we have several SEAL team members from Hawaii currently on our team. In fact one has family that goes back 200 years of living on the Island of Hawaii.

**BS:** It's good to know that we have men from Hawaii training in Hawaii. We should support our boys' training.

**MP and CR:** Thank you Bill for taking the time to meet with us, we really appreciated the opportunity.

**NAVAL SPECIAL OPERATIONS (NSO) TRAINING IN THE STATE OF HAWAII  
ENVIRONMENTAL ASSESSMENT  
STAKEHOLDER CONSULTATION MEETING  
MEETING NOTES**

**Date:** Tuesday, October 13, 2020

**Time:** 0920-1130 (Hawaii time)

**Location:** Wailua, Oahu

**ATTENDEES**

| <i>NAME*</i>                                                        | <i>ORGANIZATION*</i>                                                                    |
|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
| W. Aila (WA), Cultural Practitioner                                 | Chairman of Hawaiian Homes Commission and Director of Department of Hawaiian Home Lands |
| B. Keaulana (BK), renowned waterman, foundation family              | Makaha                                                                                  |
| W. Laeha, Cultural Practitioner                                     |                                                                                         |
| M. Parrent (MP), PM and Deputy Facilities Director/Env. Coordinator | Naval Special Warfare Group THREE                                                       |
| CWO-4 E. Alvarado (EA), Training Officer                            |                                                                                         |
| Chief J. Escobar (JE), Assistant Training Officer                   |                                                                                         |
| C. Rasmussen (CR), Archaeologist                                    | NAVFAC Pacific                                                                          |

*Notes:* \*CWO = Chief Warrant Officer; NAVFAC = Naval Facilities Engineering Command; PM = Project Manager.

**Purpose**

The purpose of the call is to coordinate with interested parties and stakeholders regarding the proposed NSO Training in Hawaii, particularly with respect to cultural resources.

**JE:** Thank you Brian for agreeing to meet with us and providing this venue in which to meet.

**WA:** Began the meeting with background of the Hawaiians, noting that they are proud of who are and where we came from. That there is mistrust from transplanted people who put up fences and install guards... and a lot of emotions involved.

**MP:** Naval Special Warfare Command has been training in Hawaii for the past 30 years. The goal of the proposed training is to not leave any trace of the training while it's being conducted or after it has been completed. We will not ask for parks or beaches to be closed to the public. As shown in the Draft Environmental Assessment, there are large purple swaths of property that we are seeking to train within. These are simply study areas, while we have an idea where exactly within these areas we propose to train, we do not know until the analysis is done where within the study area our proposed training could take place. Even then we must have the approval of the property owner to train on their property. Additionally, we could not analyze let's say only 10 ft of wave action but had to analyze a larger area. In doing so this also provides us some flexibility should a landowner agree to provide us a right of entry for a certain period and then 2 years into the agreement decide they can no longer support our request. We then have the ability to go back to the study area to determine if there is another possible site that would be appropriate for the proposed training.

While we hope to train in many harbors and beaches throughout Hawaii, what appears to be a large number of areas shrinks rapidly when one begins to factor in such constraints as; seals or honu in the area, perhaps new coral growth or limu, time of year as certain areas are not conducive to training during the winter months, canoe regattas, fishing tournaments, or the need for a particular training profile to be met. Having a wide variety ensures the training is fresh from a naval perspective, while I could probably go to the same area 50 times and it would for me still be a valid training site, for these Navy trainees after going to an area twice in one year the training would become stale, also having multiple sites ensures that there is not a cumulative impact on anyone site.

Currently these training events are covered under categorical exclusions and the Command was able to directly contact the department who controlled the area in which they wished to train to seek a permit, similar to any other user for the site. This is no longer the case due to a revision of a military instruction.

The activities proposed in the EA are similar to the ones done by the public: swimming, walking on the beach, and or hiking. The footprint is a small one as these are small units learning how to navigate and swim in new areas without leaving a trace of any training while it's being conducted or after it has been finished. No areas will be closed off to the public due to training while training is taking place and the majority of time Naval Special Warfare Command's proposed training activities would take place at night, which is the time that many of the parks and properties are closed to the public. Typically, 2 hours before the training takes place an advance team will go to the proposed training site to ensure there are no surprises (e.g., a family camping in the area or fishing activities). If there are public activities, the training cadre will simply relocate the training or cancel it altogether.

We have been working on this proposed EA since 2016, in 2018 it went out for a 60 day public review and comment period. The bulk of the comments we received were from the community along the Kohala coastline on the Big Island and from the Molokai community. The scope of proposed training activities assessed in the Draft EA was misinterpreted and we have been consulting with various members of these communities so that we can address their concerns.

**BK:** The Hawaiians are true watermen like the SEALs. They are Hawaiians and Hawaiians are family.

There is a need to have training integrated into the community, educate local people on military training and factual impacts. Have SEALs participate in events in which locals/SEALs work hand in hand (fish pond, SUP squash contest, beach cleanup, etc.). Educate military personnel on basic Hawaiian culture and the concept of stewardship vs. ownership. There needs to be a maturity and respect at all levels and a need for the senior leadership to educate and pass down knowledge to younger military personnel (create a culture of respect). We are divided by land but connected by water.

**WA:** What type of training?

**EA:** Small unit training, swimming, the use of small vessels such as submersibles and supporting boats such as RHIBs, or a small ship about 200-300 ft in length that has the dive chamber on it. Normally there are 2 RHIBs that follow the trainees and in the RHIBs there is a medic, coxswain, dive supervisor, a marine mammal lookout, and a crewman; along with the boat there are small buoys that are tethered to the submersibles or divers so that they can be followed. There is no use of landing craft and the intent is to come on to a beach and disappear. Training needs to take place within a 1-hour access to a decompression chamber unless we are utilizing the small ship. Training typically takes place starting in early evening and running through early morning, mostly done at night.

**WA:** There may be no archeological, cultural, or physical impacts but there may be impacts on the ha'a, or an essence of the ha'a ceremony; and they will need to avoid makahikis.

**WL:** Mentioned that makahikis also have a night component to them.

**CR:** Mr. Aila, I had met you years ago when working on a road project and we met to discuss iwi. I have been working on archeological projects in Hawaii for the past 30 years.

**BK:** Fishing Tournaments and fish runs need to be avoided. Akule fisherman, the Konohiki and the leader of the area, along with foundation families may need to be contacted so that they can share their lineage of the area, their knowledge, and their concerns. Find out who are the original families in an area along with the hunters in a particular area that might have an interest in this training proposal. Stewardship of an area, from mauka to makai is important.

**WA:** Hawaiians shared what they had; it was not a bartering system, but rather stewardship of an area that relied on sharing. If one had ample fish then this was shared with others with no expectation of a quid pro quo. There was also a heuwai, a cleanup rite, a chant to cleanse one's thought, nothing has to be taken, this is my school, this is my church.

**EA:** The water is your home, when we get into trouble, where do we go? We go home, this is where we are safe.

**BK:** The waters are a healing place. I can tell just from listening to the water, what type of water break there is, water depth, shoreline, the sound of water provides so much information. Water is life. Rain falls. Water can be powerful. It can be calm. Water heals and cleanses.

**MP:** Interesting to note that Hawaiians were a water-based warrior culture as is our team. In fact, we recruit well from Hawaii and currently have several members of our team that are from Hawaii; to include the Big Island, Kauai, and Oahu. They are all watermen that gravitate to other watermen - they have an affinity for the water and appreciation of the water.

**WA:** [Presented flag to CWO-4 Alvarado taken from a sunken navy ship that is being used as a reef off the coast of Waianae]. Stated that the planting of the flag was offensive to Hawaiians. We need to understand the past and acknowledge who we are right now.

**EA:** Thanked WA for providing this information and the flag and I will definitely speak with team members to ensure this doesn't happen again.

**MP:** This is not in keeping with proposed EA as to leave no trace is paramount for the training. We need to approach these areas with humility.

**WA:** Is there anything else?

**MP:** Yes, we will need assistance with wording of special meaning to incorporate into training.

**BK:** Offered the area where the meeting was held as a meeting place for others in the future should we need it.

We all thanked BK and WA for meeting with us and providing guidance.