U.S. NAVY PACIFIC MISSILE RANGE FACILITY AND NASA KŌKE'E PARK GEOPHYSICAL OBSERVATORY REAL ESTATE

FINAL ENVIRONMENTAL IMPACT STATEMENT

August 2026

VOLUME 4

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Appendix I

Environmental Impact Statement Comments and Responses

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Scoping Comments and Responses

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Public Scoping Comments and EIS Team Responses

Scoping Commenter's Organization (if applicable)	Scoping Commenter Name	Scoping Letter ID	See Table I-1 page:
Federal			
Environmental Protection Agency, Region 9	Laney Gordon	41	85
State			
Board of Land and Natural Resources	Karen Ono	84	210
Department of Education	Ron Ikeda	58	164
Department of Health, Clean Water Branch	Reef Migita	8	8
Department of Land and Natural Resources, Engineering Division	Timothy Chee	12	15
Department of Land and Natural Resources, Land Division	Dayna Vierra	33	58
Division of Aquatic Resources	Kendall Tucker	34	70
Office of Hawaiian Affairs	Stacey Ferriera	32	45
Office of Planning and Sustainable Development	Joshua Hekekia	25	34
Other			
E Ola Kākou Hawai'i	Nākaielua Villatora Lobilina	79	199
Kauai Climate Action Coalition	Helen Cox	37	73
Kauai Climate Action Coalition, Kauai EV, Surfrider, Kauai Board of Realtors	Steve Parsons	47	98

Scoping Commenter's Organization (if applicable)	Scoping Commenter Name	Scoping Letter ID	See Table I-1 page:
Kauai EV	Ruta Jordans	50	109
Kaua'i Historical Society	Anonymous	21	29
Malama Anahola Kakoo Kaua	Sherri Cummings	83	209
Native Hawaiian Organization Na Hui O Kaneiolouma	Sandra P. Quinsaat	22	30
Surfrider Foundation, Kaua'i Chapter	Rob Brower	13	15
The Return Voyage	Iokepa Imaikalani	11	14
The Return Voyage	Inette Miller	10	14
University of Hawai'i at Mānoa, Ethnic Studies	Kyle Kajihiro	55	139
Wailua Homesteads Resident	Jordan Lemke	9	9
Zero Waste Kauai	Ruta Jordans	43	94
Individuals			
n/a	Anonymous	19	25
n/a	Anonymous	56	161
n/a	Anonymous	76	198
n/a	Bonnie P Bator Ohana	38	81
n/a	Lana Bilbo	62	169
n/a	Lana Bilbo	82	202
n/a	Keala Heanani Carter	49	107
n/a	Chong Family	5	6
n/a	R. Chong	48	107

Scoping Commenter's Organization (if applicable)	Scoping Commenter Name	Scoping Letter ID	See Table I-1 page:
n/a	Thomas Clements	26	37
n/a	Rosalyn Cummings	52	114
n/a	Roslyn Cummings	67	180
n/a	Sherri Cummings	73	194
n/a	Michael Curtis	31	45
n/a	Jose Felix-Keamoai	65	175
n/a	Peleke Flores	70	188
n/a	Nicholas Franklin	2	2
n/a	Marjorie Gifford	16	21
n/a	Lisa Grandinetti	28	38
n/a	Regina Gregory	40	83
n/a	Mary Hannah	80	200
n/a	Joan Heller	54	136
n/a	Hayden Hislop	30	41
n/a	Hanna Hodak	23	32
n/a	Kevin Houck	46	97
n/a	Christopher Ka'iakapu	68	185
n/a	Sommer Kauakahi	57	162
n/a	Punohu Kekauala III	64	174
n/a	Charles King	14	21
n/a	Terry Lilley	18	24
n/a	Mike Long	71	191
n/a	Darlyne Mcleod	72	193

Scoping Commenter's Organization (if applicable)	Scoping Commenter Name	Scoping Letter ID	See Table I-1 page:
n/a	Kainoa Nakazawa	81	201
n/a	Melissa Nash Family	36	71
n/a	Eric Nguyen	20	26
n/a	Catherine Orlans	1	1
n/a	Linda Oshiro	35	71
n/a	Alice Parker	61	168
n/a	Alice Parker	74	196
n/a	David Phillips	15	21
n/a	Sandy Phillips	75	197
n/a	Malcolmn Pryor	77	198
n/a	Ray Catania Puhi	42	93
n/a	Naadia Puri	7	1
n/a	Dylan Ramos	17	23
n/a	Louise Sausen	39	82
n/a	Richard Spotts	4	4
n/a	Matt Sneed	78	199
n/a	Lauren Stovall	53	133
n/a	S. Strom	59	164
n/a	Susan Strom	60	167
n/a	Claire Tonry	51	110
n/a	James Trujillo	45	96
n/a	Nākaiʻelua Villatora	66	178
n/a	Maria Walker	44	95

Scoping Commenter's Organization (if applicable)	Scoping Commenter Name	Scoping Letter ID	See Table I-1 page:
n/a	Valerie Weiss	6	6
n/a	Susan Wiener	27	38
n/a	Gordon Willson-Naranjo	69	188
n/a	Don Wilson, USN, Retired	29	39
n/a	Wesley Yadao	63	172
n/a	Jason Yotsuda	24	33
n/a	Bill Zimmerman	3	3

The Environmental Impact Statement (EIS) Team recognizes that the Environmental Impact Statement Preparation Notice (EISPN) identified environmental justice as a resource to be analyzed. However, Executive Order (EO) 14148 "Initial Rescissions of Harmful Executive Orders and Actions" (90 Federal Register 8237) and EO 14173 "Ending Illegal Discrimination and Restoring Merit-Based Opportunity" revoked prior EOs requiring the analysis of Environmental Justice concerns under the National Environmental Policy Act (NEPA). Therefore, a discussion of environmental justice is not carried forward as a resource section in the EIS.

The EIS Team also notes that the acreage presented during scoping and in the EISPN double-counted one easement area and has, therefore, been reduced from 8,348 acres to 8,172 acres (176-acre reduction in the easement area). The original acreage presented in scoping and in the EISPN appear in scoping comments, these numbers have not been changed. The corrected acreage is reflected in the EIS Team's responses to comments and in the EIS.

Table I-1 Public Scoping Comments and EIS Team Responses

Letter ID	*Commenter Name*	*Organization*	*Comment Number*	*Original Public Scoping Comment*[1]	*EIS Team Response*	*Resource/ Section*
1	Catherine Orlans	n/a	1	Even if an EIS is completed, the Hawai'i community across all islands have lost faith in the NAVY leadership specifically for their lack of transparency and how they have handled the Red Hill Fuel Spill on O'ahu. We don't want more detrimental enrivonmental impacts on other islands. Go away. The community wants the land agreement expire. Landback for our inidigenous host culture and the ongoing illegal occupation of the Hawaiian Kingdom.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix C, and Section 5.1 (Consistency with Government Plans and Policies) of the Draft EIS. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action	General Opposition to Navy, Land Use and Access

[1] This column only reproduces commenters' original text. Original comments are included as they were submitted following Table I-1.

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
					alternative includes additional development. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
2	Nicholas Franklin	HHSC-KR	1	Thank you for your service in protecting America. As a Kauai resident since 2019 I appreciate the contributions of this joint venture. Beyond the strategic mission, PMFR and NASA are the third largest employer on Kauai with over 1000 employees per public records, contribute to our national defense in ways I'm certain I will never know and provide community engagement with fireworks on July Forth. These are simplified and not all encompassing statements.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Thank you for recognizing services provided by PMRF and NASA. Additional information about Navy and NASA's mission and use of these lands is included in Section 1.3 (Background) of the Draft EIS. Public and agency engagement for the EIS and other community engagement is included in Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS. Potential effects to socioeconomics are discussed in Section 3.6 of the Draft EIS.	General Support, Socioeconomics
2	Nicholas Franklin	HHSC-KR	2	I support ongoing leases for the joint strategic defense as currently established.	The Proposed Action is described in Chapter 2 of the Draft EIS, and	Traffic

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
				I would encourage contributing further federal funds to repair roadways up Kokee, even past the NASA facility to Kalalau lookout, in a jesture to the community and tourist use.	includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Public road improvement projects are outside the scope of this EIS and NASA or Navy's jurisdiction.	
2	Nicholas Franklin	HHSC-KR	3	I also strongly support expanding active cell service across the Kokee State Park for safety and convenience. Fantastic that the entrance to your NASA facility has excellent service, but at my cabin lease or on most trails there is null...and as a well known local service oasis may be counterproductive to have frequent vehicles (I'm guilty) trolling around your entranceway just to check messages...or make emergency calls.	Comment noted; however, private utility updates and/or modifications are not within the scope of this EIS or NASA or Navy's jurisdiction. The EIS team suggests contacting a local cell service provider to expand services.	Utilities
2	Nicholas Franklin	HHSC-KR	4	In example: that unmarked road to the Makaha Ridge is pristine. Perhaps expanding that underlying situational readiness to the entire Kokee roadway is both generous and prudent. The number of civilians at any time in the Kokee Park would more reliably disperse up or down mountain in the event of enhanced military readiness with well maintained roadways.	The action alternatives described in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Draft EIS include securing new real estate agreements and does not include additional development or roadway improvements. Potential effects to transportation networks are described in Section 3.11 of the Draft EIS.	Traffic
3	Bill Zimmerman	n/a	1	This should be a ''no brainer'' for anyone living on any Hawaii island:	On behalf of the Navy and NASA, the EIS team thanks you for your	General Support

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
				With the very clear and continuing challenges by various Nations, SO similar to previous to the Pearl Harbor debacle, anyone, especially anyone on any Hawaii Island MUST recognize that those islands will be first and foremost in any and every aggressions by those bad actors wanting to harm USA; to think otherwise is to IGNORE the CLEAR History of the wonderful islands of Hawaii, as well as many other islands of the vast Pacific... Love and Peace to all y'all,,, VintageVNvet, now certifiably an antique far shore, but still remembering and still loving ALL the folx who were SO great and gracious to me in the Hawaiian places when I was there;;;	comment and appreciates your participation. Information about Navy and NASA's mission and use of these lands is included in Section 1.3 (Background) of the Draft EIS. Additionally, Section 1.7.5 (Ongoing Community Coordination) in the Draft EIS identifies ongoing community outreach.	
4	Richard Spotts	n/a	1	I appreciate this opportunity to provide scoping comments on this significant proposed action. At the outset, I believe that this and other federal planning and NEPA analysis processes should actively consider how the proposed action and alternatives may add to or help solve the climate and extinction crises. These overlapping crises pose an existential threat to humanity and the health of the biosphere. On the climate crisis, please review the attached IPPC report. This report summarizes the overwhelming international scientific consensus on the severity of the climate crisis and the urgent need to phase out the use and development of fossil fuels. On the extinction crisis, there are an	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation and provided attachment. Predictable environmental trends can also be found at the beginning of each resource section in Chapter 3. The EA prepared for the Joint Forces Solar Power Generation Project at PMRF is referenced in the Draft EIS. Also, please refer to Section 4.1.5 (Past, Present, and Reasonably Foreseeable Future Actions) of the Draft EIS in regard to renewable and clean energy projects ongoing and slated for future development. As described in Sections 1.3	Biological Resources

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
				increasing number of scientific reports on the rapid loss of biological diversity and how this loss undermines the stability, resilience, and productivity of the ecosystems upon which life on Earth depends.	(Background) and 3.4 (Biological Resources) of the Draft EIS, a number of Readiness and Environmental Protection Integration (REPI) projects in the vicinity of the Project Area are focused on mitigating risk to these resources and the base's military mission.	
4	Richard Spotts	n/a	2	Overall, this compelling science demonstrates the urgent need for bold and innovative solutions. Questions arise like: how can fossil fuel use be reduced and replaced by clean, renewable energy sources? How can any destruction, degradation, or fragmentation of wildlife habitat be avoided, reduced, or successfully mitigated? How could construction materials be sourced from sustainable producers and practices? How could the use of any toxic chemicals be replaced by safer alternatives? How could gains in energy and water conservation be achieved? How could any harmful invasive plants be prevented, controlled, reduced, or eradicated? Please consider these questions in moving forward.	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Section 3.4 (Biological Resources) identifies potential effects from invasive species from the Proposed Action. This section also describes how PMRF works to reduce and eliminate the introduction or spread of invasive species including management strategies in the publicly available Integrated Natural Resource Management Plan (INRMP) and other plans and initiatives.	Biological Resources
4	Richard Spotts	n/a	3	On this specific proposed action, I am concerned about the many ESA listed plant and animal species in Hawaii and how this proposed action and alternatives	Section 3.4 (Biological Resources) of the Draft EIS includes a list of the ESA listed species present or with potential habitat in the Project Area.	Biological Resources

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
				may affect them. Hawaii is an epicenter for the extinction crisis. I hope this NEPA analysis will help identify the least damaging but feasible alternative to best advance the protection and recovery of those species. I also hope that any energy used will come from clean, renewable sources. Health is the ultimate wealth, and we all need a healthy environment. Thank you very much for your kind consideration of my comments and the attachment.	This is also described in Sections 2.5 (Best Management Practices) and 3.4 (Biological Resources) of the Draft EIS. Also, PMRF has an INRMP that is updated regularly and implements a comprehensive plan for natural resource conservation and management. The INRMP can be found on the PMRF-KPGO EIS website at www.pmrf-kpgo-eis.com. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-3 discusses the Navy's commitment to provide the public with annual wildlife summaries, including status updates and data reports and research studies.	
5	Chong Family	n/a	1	To whom it may concern, Like to request information on the EIS being presented for the Pacific Missile Range Facility on Kauai? Thank-you, R Chong	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The project's website with information about the PMRF KPGO EIS process was sent on May 15, 2024. Information can also be found on the website, www.pmrf-kpgo-eis.com.	EIS Process
6	Valerie Weiss	N/A	1	Please tally my vote as NO on extending the lease at PMRF. This state has already seen the results of	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your	General Opposition, Existing

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				toxic pollution by the military. The Navy has had too much leeway in their denying that they are ever to blame. At PMRF spilled PFAS are in our ocean. There are likely many other toxics spilled or dumped that we usually do not get informed on. And stop dumping Naval ships into our ocean claiming they will be reefs. They are junk and do not belong in our waters for any reason including RIMPAC exercises.	participation. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Draft EIS. The Draft EIS also includes a discussion on the Navy's adherence to applicable state and federal regulations regarding the disposal of hazardous or toxic wastes in Section 3.12 (Hazardous Materials and Waste). Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease (Appendix C), negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	Operations, Area of Analysis, Hazardous Materials and Waste, Water Resources
7	Naadia Puri	Navy Region	1	Sir/Ma'am, My name is LT Naadia Puri and I work at Navy Region Pearl Harbor, Oahu. I am unable to make these meetings in person on island, is there a link I can attend to listen to the presentation? V/R, LT Naadia Puri	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Unfortunately, the meetings were in-person; however, a scoping report is included in the Draft EIS as Appendix J.	EIS Process

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8	Reef Migita	Dept of Health, Clean Water Branch	1	Ms. Kerry Wells, The Department of Health (DOH) Clean Water Branch (CWB) has received the request for comment regarding the U.S. Department of the Navy (Navy) and National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS). As the EIS will evaluate the potential environmental consequences of the Navy's proposal to retain the use of 8,348 acres of State lands presently utilized pursuant to leases and easements on Kaua'i, Hawai'i, for operational continuity and sustainment at the Pacific Missile Range Facility (PMRF), the CWB offers the following comments:	On behalf of the Navy and NASA, the EIS team thanks the Hawai'i Department of Health, Clean Water Branch for these comments and appreciates their participation.	EIS Process
8	Reef Migita	Dept of Health, Clean Water Branch	2	The DOH and County of Kaua'i has settled with Nā Kia'a Kai and Surfrider Foundation to issue one or more draft National Pollutant Discharge Elimination System (NPDES) permits for all outfalls of the Mānā Plain Drainage Ditch System, including but not limited to the outfalls of Kīkīaola Harbor Drain, Kawai'ele Outfall, Nohili Outfall, First Ditch, Second Ditch, and Cox Drain. (The attached settlement agreement substantively represents what the parties agreed to and have filed with the US District Court for the District of Hawaii.) The Kawai'ele Outfall exists within PMRF's Installation Boundary, as shown on Enclosure (2) – Project Location Map (See 20240510.NAV PAC MISSLE FAC EIS.pdf) and the Navy currently leases the land on the Mānā Plain from the Department of	As described in Section 3.7.1 (Affected Environment) of the Draft EIS, Agribusiness Development Corporation (ADC) has applied for a National Pollutant Discharge Elimination System (NPDES) permit for all outfalls of the Mānā Plain Drainage Ditch System, including but not limited to the outfalls of Kīkīaola Harbor Drain, Kawai'ele Outfall, Nohili Outfall, First Ditch, Second Ditch, and Cox Drain. ADC would ensure compliance with any permits issued. Kawai'ele Outfall, where Kinikini Ditch connects to the open coastal waters abutting the PMRF, and Nohili Outfall, will require coordination from the Navy for compliance with NPDES permit requirements. ADC, Department of	Water Resources

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				Land and Natural Resources (DLNR) under General Lease No. S-3852 and is responsible for the operation and maintenance of the canals, including the pumps and associated infrastructure. Hence, it appears that the Navy is responsible for discharges from this outfall. The Kawai'ele Outfall is where Kinikini Ditch connects to the open coastal waters abutting the PMRF. In addition, there is another possible outfall (i.e., Nohili Outfall) from within PMRF's jurisdiction and leased area contributing to the discharge that could also be impacted. The Order for Summary Judgement and Dismissal between Nā Kia'a Kai and Surfrider Foundation, and the State of Hawaii, Agribusiness Development Corporation (ADC), see attached, may affect the Navy even if the Navy was not subject to the case. Consideration should be given to the situation where DLNR land is no longer managed by ADC. What is ADC's current role regarding the subject land and when does this role expire? If ADC is no longer involved with this land, is it the Navy's intent to apply for NPDES permit coverage for the discharges subject to the Order? Sincerely, Reef Migita	Land and Natural Resources (DLNR), and the Navy are determining a long-term strategy for these outfalls to ensure compliance should current roles change. The NPDES permit has not yet been issued for these outfalls, once the permit requirements are known, this strategy can be better solidified.	
9	Jordan Lemke	Wailua Homesteads Resident	1	Mahalo for allowing the opportunity to provide comments on the proposed use by the Navy and NASA of 8,371 acres on Kaua'i.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. As described in Section	General Opposition, Socioeconomics

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				Upon further review of the Environmental Impact Statement Preparation Notice, I offer the following comments; We do not have enough ʻāina to be awarding nearly 8,500 acres to the Navy and NASA. The lease rate is abhorrent and if the real estate action is approved, should come at a much higher price. Lessons learned from Red Hill, Kahoʻolawe, and Mākua Valley should not be ignored when considering this "real estate action".	3.6 (Socioeconomics) in the Draft EIS, new real estate agreements would be at current fair market value,-and would be determined through negotiations with Hawaiʻi Board of Land and Natural Resources (BLNR). We value your concerns related to other military installations. However, impacts at Red Hill, Kahoʻolawe, and Mākua Valley are outside the scope of this EIS. The EIS team suggests contacting government officials to voice concerns regarding other military real estate agreements.	
9	Jordan Lemke	Wailua Homesteads Resident	2	The continued military presence in Hawaiʻi does not at all offer a sense of protection to residents. Ask anyone living in Aiea on Oʻahu if they feel safer knowing the military is storing jet fuel in their puʻu's. Ask residents of Kauaʻi if they feel safer knowing ordnance's are being stored in our pali's.	The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). Section 2.5 (Best Management Practices) of the Draft EIS includes a list of the current best management practices, plans, permit requirements, management strategies, and standard operating procedures followed by the Navy on leaseholds and easement lands. Additionally, Section 3.7 of the Draft EIS discusses potential effects to water resources, Section 3.9 discusses potential effects to public health and safety (including that ordnance is stored in required	Hazardous Materials and Waste, Public Health and Safety

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					devices with proper ventilation, marking and placarding, and safety arcs have been implemented for public health and safety). This section also includes a discussion on the use of standard operating procedures that are in place to prevent unintentional release of fuels or oil. An overview of the Navy's procedures that would be followed in the event of an oil spill per the PMRF Oil and Hazardous Substance Spill Contingency Plan can be found in Section 3.9 (Public Health and Safety) of the Draft EIS. The Plan outlines procedures to be followed in the event of a spill (in flow chart form), and is available on the PMRF KPGO EIS website, www.pmrf-kpgo-eis.com. Section 3.12 discusses potential effects from hazardous materials and waste. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS.	
9	Jordan Lemke	Wailua Homesteads Resident	3	Section 1.3.3 states - On Kauaʻi, the Navy is the largest high-tech employer and third largest overall employer. It employs approximately 900 military and civilian personnel and contributes approximately	We value your concerns related to other military installations. However, impacts at Red Hill, Kahoʻolawe, and Mākua Valley and military involvement at the Maui wildfires	General opposition, Socioeconomics

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				$150 million annually in salary, contract goods, and services to the local economy. Moreover, as described in Section 1.3.6, Environmental Management and Stewardship, the Navy actively manages the natural and cultural resources at PMRF for the leased and easement lands. The poor choice of Hawai'i leaders to continue to rely on tourism and the military complex as its main source of income is not something to ride home about. The COVID-19 pandemic proved the tourism point in spades. The deadly fires in Maui on August 8 left residents wondering what exactly it was that the military did to support that situation. The National Guard had to be flown in before any real aid was offered despite having thousands of military personnel already here. Again, Red Hill, Kaho'olawe, and Mākua Valley are all prime examples of how the military are not good 'āina stewards.	are outside the jurisdiction and scope of this EIS. The EIS team suggests contacting government officials to voice concerns regarding other military real estate agreements. PMRF also demonstrates community outreach efforts by actively engaging with various stakeholders as discussed in Section 1.7.5. As discussed in more detail in Sections 1.3.6 (Environmental Management and Stewardship) and Section 3.4 (Biological Resources) in the Draft EIS, the Navy's efforts to protect natural resources at PMRF include the involvement of the Department of Defense's Readiness and Environmental Protection Integration (REPI) Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities.	
9	Jordan Lemke	Wailua Homesteads Resident	4	Section 1.4 states - By ensuring continued Navy and NASA operations on Kaua'i, the real estate action would also preserve local jobs and income for the residents of Kaua'i, financially contribute to the overall economic wellbeing of Kaua'i, and maintain continued conservation	Section 3.6 (Socioeconomics) of the Draft EIS describes potential effects to socioeconomics from the Proposed Action.	Socioeconomics

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				management of natural and cultural resources on State lands at no cost to the State of Hawai‘i. How does this real estate action contribute to the overall economic well-being of Kaua‘i? I wonder if residents really feel as though their well-being is improved by the over-presence of the military in the pae ‘āina?		
9	Jordan Lemke	Wailua Homesteads Resident	5	Lastly, the most appropriate stewards of ‘āina are the ones who have generational ties to this ‘āina. Not the Navy, nor NASA. As modern-day colonizers of these islands, we as haoles need to recognize that the appropriate people to be informing us on how to steward ‘āina are the Kānaka ‘Ōiwi. Rather than the Navy or NASA being the leaseholders, why not designate these lands as conservation lands and ensure perpetual public access? It seems aloof and albeit arrogant, for the Navy and NASA to be under the impression they are the highest and best landowners for these spaces.	Comment noted. The action alternatives considered in this EIS and the selection of these alternatives is described in Chapter 2 (Proposed Action and Alternatives) of the Draft EIS. The Navy and NASA recognize the history of land use in the Project Area as described in Sections 1.3 (Background) and 3.5 (Land Use and Access) in the Draft EIS. Analysis of potential impacts from the No Action Alternative is included in the Draft EIS consistent with legal and regulatory requirements. This alternative is described in Chapter 2 and analyzed in Chapter 3 of the Draft EIS.	EIS Process, Land Use and Access, Alternatives
9	Jordan Lemke	Wailua Homesteads Resident	6	Mahalo for allowing the public to comment. It would be a shock to me if this real estate action did not get approved as the corruption in this state, and especially Kaua‘i county is rampant. But know, the residents are watching and our patience is running very thin with the status quo.	The EIS has been prepared consistent with the U.S. and State of Hawai‘i’s legal and regulatory framework. The Proposed Action and alternatives are described in Chapter 2 (Proposed Action and Alternatives) of the Draft EIS.	General Opposition

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
				Jordan Loudon, Wailua Homesteads Resident		
10	Inette Miller	The Return Voyage	1	No action alternative.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	General Opposition
11	Iokepa Imaikalani	The Return Voyage	1	No action alternative.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all	General Opposition

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					infrastructure from the leaseholds and easement lands.	
12	Timothy Chee	DLNR, Engineering Division	1	We have no comments.	On behalf of the Navy and NASA, the EIS team appreciates your participation.	No Comment
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	1	Thank you for the notice of the Pacific Range Missile Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO) Environmental Impact Statement (EIS) scoping process. The Surfrider Foundation is a national coastal environmental organization. The Missile Range Facility is sited on the coast of Kauai. PMRF is far more than a missile range. PMRF hosts submarine training, experiments with ocean sonar, both active and passive. PMRF has also been known to have military beach landing experiments and practice during Rim of the Pacific (RIMPAC) War "Games." PMRF has an airport and has been known to have experimental aircraft testing. There have been rumors of torpedo testing that has harmed local whales.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Section 1.3 (Background) of the Draft EIS describes the Navy and NASA's use of the state lands in the area of analysis. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The scope of analysis is described in Section 1.5 (Scope of Environmental Analysis) of the Draft EIS and is limited to areas of leaseholds and easements lands where Navy and NASA conduct ongoing activities.	Existing Operations, Biological Resources, Area of Analysis
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	2	Our first comment is that honest EIS scoping is impossible to do because everything done at PMRF is closed off and classified. The public has no idea of the dangers they might face from PMRF	Comment noted. Effects from ongoing PMRF activities are publicly available via the 2018 Hawaii-Southern California Training and Testing (HSTT) Final EIS/Overseas EIS	Existing Operations

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				activities and experiments. The EIS process should be transparent and inclusive, allowing for meaningful public participation. It is vital that the community is kept informed and has ample opportunity to provide input throughout the process.	(OEIS). The 2018 HSST EIS can be found on the PMRF-KPGO Draft EIS website at www.pmrf-kpgo-eis.com. The EIS has been prepared consistent with the U.S. and State of Hawai'i's environmental regulatory framework, which includes public participation as described in Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS.	
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	3	Our second comment is recurring. The Navy writes its own EIS and then the Navy certifies its own EIS. From our point of view, that is unethical and unfair and not in the spirit of the National Environmental Protection Act. We request an independent body prepare the DRAFT EIS.	As described in Section 1.1 (Project Introduction and Overview) of the Draft EIS, the EIS has been prepared by a third-party contractor consistent with Hawai'i Environmental Policy Act (HEPA) and NEPA laws and regulations. Board of Land and Natural Resources (BLNR), as the accepting authority (under Hawai'i Administrative Rules [HAR] Section 11-200.1-28), will evaluate whether the applicant-prepared EIS fulfills the intent of Hawai'i Revised Statutes (HRS) Chapter 343 and will consider HRS Title 12, Chapter 171 (Hawai'i's law governing management and disposition of public lands).	EIS Process
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	4	Further scoping comments An environmental assessment of the natural lands around PMRF should be done and compared to the last EIS. Have the coastal lands and wetlands been enhanced or degraded? Have endangered	In lieu of an environmental assessment, it was determined an EIS was the appropriate level of environmental review. As described in Section 3.12 (Hazardous Materials and Waste) of	Area of Analysis, Biological Resources, Hazardous Materials and Waste

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				species increased or decreased from the last EIS? The EIS should address the potential impacts on local flora and fauna, especially endangered species and their habitats. The analysis should include the effects of noise, light pollution, and any chemical byproducts that may affect the ecosystem. Please update and compare the Environmental Baseline Survey for the lowland area that was done over 20 years ago and complete a new Environmental Baseline Survey for the mauka (inland) area.	the Draft EIS, chemical byproducts with the potential to be hazardous are managed in compliance with several environmental regulations. A list of these regulations can be found in Appendix E. Section 3.4 (Biological Resources) describes potential effects from the Proposed Action (including noise and light pollution), and these are supported from baseline flora and fauna studies conducted in support of this EIS. Section 3.7 (Water Resources) includes a description of the existing condition of wetlands in the Project Area and also describes potential effects from the Proposed Action. A wetland delineation was conducted in support of this EIS and can be found in Appendix N.	
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	5	The EIS should assess how climate change will affect the facility's operations and how the facility might contribute to climate change. This includes evaluating greenhouse gas emissions and potential increases in sea levels. That should include emissions from small boats, submarines, tow motors, missiles, airplanes and helicopters.	Although as described in Chapter 2 of the Draft EIS, the Proposed Action does not include additional activities or development. Potential effects from the Proposed Action to natural resources are discussed in Sections 3.4 (Biological Resources) and 3.7 (Water Resources), and potential effects from the Proposed Action to air quality and greenhouse gases are discussed in Section 3.10 (Air Quality and Greenhouse Gases). A map showing the 3.2-foot sea level rise scenario is included in Section	Air Quality and Greenhouse Gases, Sea Level Rise

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					3.1.2 of the Draft EIS, and predictable environmental trends (including sea level rise) are discussed in each resource section. The Environmental Assessment (EA) prepared for the Joint Forces Solar Power Generation Project at PMRF is referenced in the Draft EIS. Also, please refer to Section 4.1.5 (Past, Present, and Reasonably Foreseeable Future Actions) to read about ongoing renewable and clean energy projects and projects slated for future development at and within the vicinity of PMRF. As described in Sections 1.3 (Background) and 3.4 (Biological Resources) of the Draft EIS, a number of Readiness and Environmental Protection Integration (REPI) projects in the vicinity of the Project Area are focused on mitigating risk to these resources and the base's military mission. Each resource chapter in the EIS contains a table summarizing predictable environmental trends.	
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	6	The water table at PMRF should be evaluated for military toxins. Groundwater contaminants were found in the past. Also, there had been a flame-retardant spill in the past. This is particularly important since there is a commercial shrimp farm adjacent to PMRF. Is the Shrimp Farm water contaminated?	Existing conditions and potential effects from the Proposed Action to water resources are described in Section 3.7 (Water Resources) of the Draft EIS. Additionally, existing conditions and potential effects from hazardous materials and waste is	Water Resources, Hazardous Materials and Waste, Public Health and Safety, Land Use and Access,

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					described in Section 3.12 of the Draft EIS.	Cumulative Effects
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	7	PMRF has facilities from the World War II era. Are there any impacts? What is the condition of the fuel tanks at PMRF? When will they be replaced? How do they differ from Red Hill, Oahu? Please evaluate the impacts of explosive ordinance stored at the leased facilities at PMRF. Please evaluate the danger to the public of trucks carrying ordinance, jet fuel, missiles and military weapons on Kaua'i highways. How is the solid waste managed? How is sewage managed?	Management of solid waste and the potential effects from hazardous materials, hazardous waste, and solid waste from the Proposed Action are described in Section 3.12 of the Draft EIS. Potential effects to public health and safety are described in Section 3.9, and potential effects to transportation are described in Section 3.11 of the Draft EIS.	Existing Operations, Public Health and Safety, Hazardous Materials and Waste, Transportation
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	8	Please look at the electromagnetic radiation radar effects on the soldiers, Koke'e residents and on local bird wildlife. Does the radar affect civilian weather use or boating navigation?	Potential effects to public health and safety in the Project Area are described in Section 3.9 of the Draft EIS. Potential effects to biological resources (wildlife) in the Project Area are described in Section 3.4 of the Draft EIS.	Existing Operations, Public Health and Safety, Hazardous Materials and Waste, Biological Resources
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	9	The land around PMRF was formerly agricultural, much of it still in agriculture. What are the Navy's intentions and what are the impacts? PMRF leased land is in an extreme fire danger area. Are there mitigations they could do to lessen the danger?	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development.	Land Use and Access, Public Health and Safety, Biological Resources

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					Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities are described in Cumulative Impact Analysis (Chapter 4 of the Draft EIS). A history of land use in the project area is included in Section 1.3 (Background) and Section 3.5 (Land Use and Access). As described in Section 3.9 (Public Health and Safety) of the Draft EIS, PMRF ensures that launch areas are maintained free of flammable vegetation and therefore have minimal fire potential, non-native areas are regularly mowed, areas adjacent to pads are pre-soaked with water prior to a launch, and fire and emergency service crews are present at every launch.	
13	Rob Brower	Surfrider Foundation, Kaua'i Chapter	10	It is crucial that the EIS explores alternative strategies that could minimize environmental and social impacts. Additionally, the document should outline clear mitigation measures to address any potential adverse effects. Rob Brower, Chair Surfrider Foundation, Kaua'i Chapter	Socioeconomics is addressed in the Draft EIS in Section 3.6. Potential mitigation and enhanced management measures (EMMs) from identified effects from the Proposed Action are identified throughout Chapter 3 and summarized in Chapter 5 (Mitigation	Socioeconomics

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					and Enhanced Management Measures) of the Draft EIS.	
14	Charles King	n/a	1	I am in full support of renewing all the leases to the Navy at PMRF. I have been in business on Kauai for 50 years and have always found them to be good neighbors. I remember, in particular, their support of our citizens and local government during Hurricane Iniki.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Thank you for recognizing services provided by PMRF during Hurricane Iniki. Potential effects to public health and safety are discussed in Section 3.9 of the Draft EIS.	General Support for Navy
15	David Phillips	n/a	1	How much does the Navy pay the State total to lease the lands?	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. As described in Section 3.6 (Socioeconomics) in the Draft EIS, new real estate agreements would be at current fair market value, and would be determined through negotiations with Board of Land and Natural Resources (BLNR). According to the real estate agreements (Appendix C), Navy paid $1 to the State of Hawai'i for their leases. NASA pays the State of Hawai'i $600/year for the leases.	Socioeconomics
16	Marjorie Gifford	n/a	1	Land use: Because of the high demand from both residents and tourists for the use of our beaches, it is almost impossible to get a parking place with beach access espedically on Saturdays and Sundays. If pmrf did not occupy and obstruct so much of our beachland, it would provide greater access to our residents. It is too time consuming to try to obtain a beach permit	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using	General Opposition, Land Use and Access, Transportation

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				at pmrf AND the choice beach is not available except on one day at the beginning of July.	the main gate and affords unrestricted travel and access to Majors Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 and 3.5 (Land Use and Access) of the Draft EIS, the Proposed Action does not change public access at PMRF. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-2 discusses the streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	
16	Marjorie Gifford	n/a	2	LAND USE: Further, we need flat lands available on which to build housing for our low income people. Our workers are leaving the island because they cannot	As described in Section 1.3.5 (Navy and NASA-use of state lands), the flat lands adjacent to PMRF (Mānā Plain) are restrictive use agriculture	General Opposition, Land Use and Access

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				find housing or rentals. Leaving the pmrf areas available for the county to develop for low income housing would be a boon to our county. LAND USE: This land belongs to the Sovereign Hawaiian Kingdom and should be returned to it.	easement lands. These areas are used as safety buffer zones around the Navy's activities on fee simple land. In addition to agricultural uses, these lands are available for conservation, open space, and recreational uses. The Proposed Action is described in Chapter 2 of the Draft EIS and does not include housing. A history of land use is included in Sections 1.3 (Background), 3.2 (Archaeological and Architectural Resources), and 3.5 (Land Use and Access). The EIS has been prepared consistent with the U.S. and State of Hawai'i's environmental regulatory framework.	
17	Dylan Ramos	n/a	1	The Navy and NASA should stop all PMRF operations and consider the serious concerns regarding cultural resources, land use, environmental justice, national defense, and more that have been raised for years by Native Hawaiian organizations, environmental groups, and grassroots, community-based movements.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. We value your concerns in regard to Navy and NASA operations. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Draft EIS. Potential impacts to cultural resources and land use from the Proposed Action can be found in Sections 3.2 (Archaeological and Architectural Resources), 3.3	General Opposition, Archaeological and Architectural Resources, Cultural Practices

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					(Cultural Practices), and 3.5 (Land Use and Access) of the Draft EIS. Regarding concerns related to environmental justice, please see the introductory paragraph on page I-1 of this appendix. Analysis of potential impacts from the No Action Alternative is included in the Draft EIS consistent with regulatory requirements. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
18	Terry Lilley	n/a	1	I am the marine biologist from Hanalei Kauai that documented the Navy killing the coral reefs along Kauai north shore with their microwave radar towers and electromagnetic discharge into the sea from submarines from 2012 to 2014. Navy produced radiation breaks down the calcium carbonate structure of the coral killing the reef. I have all the science proving this and I presented that to PMRF commander and legal team in 2015. The Navy needs to include in their EIS the	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. As described in Chapters 1 and 2 of the Draft EIS, the scope of the EIS includes land-based leaseholds and easement lands; therefore, marine resources, such as sea turtles and whales, are not covered in the scope of this EIS. Potential effects from the Proposed Action to marine resources,	Existing Operations, Hazardous Materials and Waste, Public Health and Safety, Biological Resources

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				effects of microwave radar towers, electromagnetic, plasma energy weapons and other forms of radiation used for surveillance underwater. By ignoring the effects of these energy sources the Navy would be violating the US Endangered Species Act as they operate in the habitat of the protected sea turtles, monk seals and endangered seabirds. Here is a movie I did on the subject in 2014 that I supplied to Congress. We have a great deal of new science done on the subject now from marine corrosion test to "skin effect" testing. https://www.youtube.com/watch?v=YwTElEv5OX4&authuser=0	including the endangered monk seal and sea turtle that utilize the terrestrial region of influence (ROI), are described in Section 3.4 (Biological Resources) of the Draft EIS. Potential effects to public health and safety are discussed in Section 3.9 of the Draft EIS.	
19	Anonymous	n/a	1	The navy has threatened the very life that sustains the citizens it's supposed to protect by poisoning the water and damaging our ecosystem. End this unnecessary suffering now so our planet and people have a chance	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. We value your concerns in regard to Navy's operations at PMRF. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Draft EIS and Section 3.7 (Water Resources) of the Draft EIS. Chapter 5 (Mitigation and Enhanced Management Measures) of the Draft EIS describes actions the Navy and NASA are currently taking to avoid and minimize impacts from the	General Opposition to Navy, Water Resources, Biological Resources

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					Proposed Action and would continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina.	
20	Eric Nguyen	n/a	1	Allowing the Navy to construct facilities in Koke'e would be introducing an inevitable environmental disaster. The Navy has a long history of showing zero competency and an unacceptable lack of transparency with the public in terms of being able to manage its own facilities and Hawaii's cultural & natural resources. The latest of many examples include Red Hill, Kamokala, and the ongoing contamination of lands at Joint Base Pearl Harbor. The effects of any sort of mishap would be too costly of a burden for the County of Kauai and State of Hawaii to handle. Installations on the island of Kauai already disrupt natural wildlife (i.e. PMRF and nesting birds).	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. We value your concerns in regard to Navy's operations at PMRF. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Draft EIS. As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Draft EIS, PMRF maintains an up-to-date INRMP Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF is to meet compliance requirements, sets management goals, required actions, and obtain resources	General Opposition to Navy, Water Resources, Socioeconomics, Biological Resources, Cultural Practices, Archaeological and Architectural Resources

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					necessary to protect and manage the installation's natural resources. The ICRMP is a plan that provides coordinated management of cultural resources and PMRF's mission with stewardship on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. As described in Section 3.4, and as presented in the INRMP, mitigation measures are in place for wildlife protection and management on PMRF. These include searching for Migratory Bird Treaty Act (MBTA) protected birds before and during construction activities, surveying beaches for sea turtle nesting activity or nests before amphibious landings and beach activities, reserving activities requiring night lighting for outside of seabird breeding and fallout season, and by using red and shielded light when possible at PMRF. PMRF also demonstrates community outreach efforts by actively engaging with various stakeholders as discussed in Section 1.7.5 of the Draft EIS. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in	

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					Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Potential impacts to archaeological and biological resources from the Proposed Action are described in Sections 3.2 and 3.4, respectively, in the Draft EIS. We value your concerns related to other military installations. However, impacts at Red Hill and Joint Base Pearl Harbor-Hickam are outside the scope of this EIS.	
20	Eric Nguyen	n/a	2	The impacts of equipment placed atop Koke'e must be studied to exhaustion, to not only wildlife, but to native flora, effects on local hydrology and geology, and with serious consideration of input from the people of Hawaii. Koke'e must be treated as a vital natural resource and preserved for the current generation as well as future generations. No more military development!	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Potential effects from military equipment to wildlife at Koke‘e from the Proposed Action are discussed in Section 3.4 (Biological Resources) of the Draft EIS. Potential impacts from the Proposed Action on hydrology and geology are discussed in Section 3.7 (Water Resources) of the Draft EIS. Any future development by Navy and NASA are not in the scope of this EIS and would be subject to	General Opposition to Navy, Biological Resources, Water Resources

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					additional environmental review (Hawai'i Environmental Policy Act [HEPA] and/or National Environmental Policy Act [NEPA]).	
21	Anonymous	Kaua'i Historical Society	1	Aloha, I'm a resident of Kaua'i, born and raised, and I am very interested in the results of the EIS and the overall process of the DOD's request to renew their lease. As an involved member of our West Side community, I have various concerns. I hope this report can be transparent about the following: -within the current plot of 8000+ acres, what kind of cultural, Hawaiian sites are there? What kind of care and protection is designated in those spaces. - how much live ammunition is tested on this property, what is the process of clean up after testing? - what kind of chemicals do these heavy metals/materials leave behind in the groun? Does it have any effect on nearby water sources? - What kind of guidelines are in places to protect areas of resource like watersheds, streams, irrigation systems, etc.? - will the team overseeing the EIS work with a cultural practitioner or historian? I am against renewing the lease as it stands, and I believe reform on the current lease is essential to protecting Hawai'i and our people. I have signed up for the email list. Thank you for your time and I look forward to seeing how this unfolds.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Section 3.2 (Archaeological and Architectural Resources) of the Draft EIS describes the context in the region of influence (ROI) as well as the known archaeological and historic sites. Section 3.3 (Cultural Practices) of the Draft EIS includes a description of cultural practices within the ROI, including a list of individual cultural practitioners interviewed as part of preparing the Cultural Impact Assessment (CIA). Additional ongoing coordination conducted by PMRF is listed in Section 1.7.5 (Ongoing Community Coordination) in the Draft EIS. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development.	Cultural Practices, Archaeological and Architectural Resources, Public Health and Safety, Hazardous Materials and Waste, Water Resources, EIS Process

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					The proposed real estate agreement would be at current fair market value. As described in Section 1.5 (Scope of Environmental Analysis) of the Draft EIS, the scope of analysis is limited to the Navy and NASA's activities on leaseholds and easement lands. Potential effects from the Proposed Action are described in Chapter 3 of the Draft EIS, including potential effects to Hazardous Materials and Waste (Section 3.12), Public Health and Safety (Section 3.9), and Water Resources (Section 3.7). Protection measures and safeguards are discussed in these sections, and also in Section 2.5 (Best Management Practices) of the Draft EIS. Your group's contact information has been added to the mailing list.	
22	Sandra P. Quinsaat	Native Hawaiian Organization Na Hui O Kaneiolouma	1	Aloha mai, For the record, my name is Sandra Puanani Quinsaat, I am 70 years old, born and raised here on Kaua`i and thankful I can still live here. I am of Kanaka/Filipino/Caucasian decent. I received your correspondence referencing the above noted subject, mahalo for reaching out. I will not be able to attend your meetings and appreciate submitting my testimony in writing. Your proposed action is needed as the existing agreement for the State lands you occupy are set to expire. For this I'm sure	On behalf of the Navy and NASA, the EIS team thanks you for your participation and providing your comments in writing. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action	Land Use and Access, Proposed Action, Existing Operations

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				there will be negotiations with the State based on the outcome of the EIS. These facilities are currently in existence with significant justification in their practices and areas of potential affect established. I don't object to the continuance of your business as you are currently operating. Your transparency and collaboration within our Island communities are key. I do however, strongly object to further development of buildings and desecration of ground on the properties you currently occupy. Moreover, I object to any training practices that exercises munition artillery that will impact the land or marine life in anyway shape or form. I say this by learning from history's lessons. Government has used abused and walked away from all destruction by their hands. No more! Not here on Kaua'i or anywhere else in this State going forward. Why ruin what little we have left, we are not a continent, where do we go! We know of other South Pacific Islanders who now reside here in Hawaii because their island was destroyed by US Government and countless destruction already done here in our State. These events happened we know that, so why would we support any form of destruction to our lands.	alternative includes additional development. Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used. Section 1.7.5 (Ongoing Community Outreach) of the Draft EIS, describes how PMRF regularly coordinates with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. Chapter 5 (Mitigation and Enhanced Management Measures) describes actions the Navy and NASA are currently taking to avoid and minimize effects from the Proposed Action and continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina. Although it is out of scope for this EIS, previous National Environmental Policy Act (NEPA) analysis has been conducted that covers ongoing	

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					testing and training activities on fee simple land adjacent to the state-owned parcels (see Section 1.3.3 of Draft EIS) and can be found on the PMRF-KPGO EIS website at www.pmrf-kpgo-eis.com.	
22	Sandra P. Quinsaat	Native Hawaiian Organization Na Hui O Kaneiolouma	2	The State of Hawaii has laws in place to protect the land and its resources, I Pray they understand their responsibility to the Native Hawaiian/Kanaka as appointed stewards for the the people and make decisions based on Hawaii Revised Status. With the lack thereof being Hawaiian Lands and Resources, Military presence here in Hawaii must be regulated. I further pray that all contracted agreements between PMRF and the State are done with the best interest of Kaua`i residents at heart. Mahalo for your understanding of my testimony Kind regards, Sandra P. Quinsaat, Native Hawaiian Organization, State of Hawai'i: Kaua'i/Ni'ihau Island Burial Council Commissioner/Chair	The Navy and NASA understand the public's awareness and concern regarding military actions and their ability to be good stewards of the land. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Draft EIS.	Cultural Practices, Land Use
23	Hanna Hodak	n/a	1	The Pacific Missile Range Facility Barking Sands should not be in use or be furthered as it is harmful to local land, voices, and culture. There should be a Demilitarization to the parts of Hawai'i that can still be kept safe and culturally sound.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. As discussed in Sections 3.4 (Biological Resources) and 3.2 (Archaeological and Architectural Resources) of the Draft EIS, PMRF would continue to be stewards of the land through the use of their Integrated Natural	General Opposition to Navy, Land Use and Access, Cultural Practices

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					Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF is to meet compliance requirements, and set management goals and required actions. The 2023 INRMP can be found online at www.pmrf-kpgo-eis.com. Sections 3.2 (Archaeological and Architectural Resources, 3.3 (Cultural Practices), and 3.4 (Biological Resources) of the Draft EIS include analysis of potential effects to these resources from the Proposed Action.	
24	Jason Yotsuda	n/a	1	Hi, I just wanted to put my 2 cents in about the continuation of PMRF using the area. In the past, we were allowed to access the beaches for fishing, but since 911 that has been taken away. The area is prime for fishing and beach going. I support PMRF, but not at the cost of restricted use of the beach area. Mahalo, Jason	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized	Land Use and Access, General Support

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					access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access) of the Draft EIS, the Proposed Action would not change public access at PMRF. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-2 discusses the streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	
25	Joshua Hekekia	State of Hawai'i Office of Planning and Sustainable Development	1	Thank you for the opportunity to provide comments for the Environmental Impact Statement Preparation Notice (EISPN) on the Pacific Missile Range Facility and Koke'e Park Geophysical Observatory Real Estate Project. The notification request was received by our office via memo on May 13, 2024. It is our understanding that this real estate study involves two federal agencies. The U.S. Navy (USN) proposes to retain the use	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation.	EIS Process

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				of 8,348 acres of the subject parcel for operational continuity and sustainment (in support of continued military training, testing, and facility operations) at the Pacific Missile Range Facility (PMRF). The National Aeronautic Space Administration (NASA) proposes to retain the use of 23 acres of the subject area in support of continued operations at Kōkeʻe Park Geophysical Observatory (KPGO). Both federal agencies have agreements with the State of Hawaiʻi. The Department of Land and Natural Resources (DLNR) has the fiscal responsibility to manage these real estate agreements land leases which are set to expire between 2027 and 2030. The Office of Planning and Sustainable Development (OPSD) has reviewed the submitted material and has the following comments to offer:		
25	Joshua Hekekia	State of Hawaiʻi Office of Planning and Sustainable Development	2	Issues of Programmatic Concern We acknowledge that the EISPN touches on issues that are of programmatic concern for OPSD and that will be addressed in the Draft Environmental Impact Statement (DEIS). These include State Land Use controls Hawaiʻi Revised Statutes (HRS) Chapter 205 (State Land Use Laws); HRS Chapter 226 (the Hawaiʻi State Planning Act); and as stated in Appendix B of the EISPN regulatory settings concerns that are related to the coastal environment such as Water Resources; Marine Biological Resources; and Geological Resources.	Comment noted.	Regulatory Setting, Water Resources

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25	Joshua Hekekia	State of Hawai'i Office of Planning and Sustainable Development	3	Coastal Zone Management Act (CZMA), Federal Consistency We note that Table 4-1, page 4-3 of the EISPN correctly identifies that this project may be subject to CZMA Federal Consistency based Title 15 Code of Federal Regulations (CFR) Part 930 Subpart C – Consistency for Federal Agencies. OPSD is the lead state agency with the authority to conduct CZMA federal consistency reviews. At your earliest convenience, please contact our office on the applicability of CZMA federal consistency.	The Navy and NASA will be coordinating with the State of Hawai'i Office of Planning and Sustainable Development, Planning Division under the Coastal Zone Management Act (CZMA) as described in Section 6.1 (Consistency with Government Plans and Policies) of the Draft EIS.	Consistency with Government Plans and Policies
25	Joshua Hekekia	State of Hawai'i Office of Planning and Sustainable Development	4	Hawai'i Coastal Zone Management (CZM) Program The CZM area is defined as "all lands of the State and the area extending seaward from the shoreline to the limit of the State's police power and management authority, including the U.S. territorial sea" under HRS § 205A-1. Pursuant to HRS § 205A-4, in implementing the objectives of the CZM program, agencies shall consider ecological, cultural, historic, esthetic, recreational, scenic, open space values, coastal hazards, and economic development. As the determining agency is the DLNR Land Division, to assist in the decision-making process, the DEIS should include a discussion on the project's consistency with the policies of the Hawai'i CZM Program, HRS § 205A-2, as amended. Furthermore, the objectives and supporting policies of the Hawai'i CZM Program serve as the foundation of the	Effects to resources such as archaeology, land use, socioeconomics, and water are described in Sections 3.2 (Archaeology and Architectural Resources), 3.4 (Biological Resources), 3.5 (Land Use and Access), 3.6 (Socioeconomics), and 3.7 (Water Resources) of the Draft EIS. Chapter 5 (Mitigation and Enhanced Management Measures) of the Draft EIS describes actions the Navy and NASA are currently taking to avoid and minimize impacts from the Proposed Action and would continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the 'āina.	Consistency with Government Plans and Policies

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				enforceable policies of the State of Hawai'i. Disclosure of impacts on CZM objectives and supporting policies will aid the State in determining impacts to central O'ahu surface water resources as well as evaluate needed mitigation measures. For any questions, please contact Joshua Hekekia at (808) 587-2845 or by email to Joshua.K.Hekekia@hawaii.gov. If you wish to respond to this comment letter, please include DTS 202405131013NA in the subject line. Sincerely Mary Alice Evans, Director		
26	Thomas Clements	n/a	1	I support Alternative 1 and recommend this as the preferred alternative. This alternative provides for the continued use of these lands with minimal costs to administer. Alternative 2 potentially causes the State of Hawaii to purchase these lands when no longer needed by PMRF, creating cost for the Federal government at the front, and State government at the other end. If not purchased back by the state at that time, the lands could potentially be purchased by private entities and used in non-compatible ways. I see compatibility as the key issue for West Kauai. Currently, Hawaii's top three industries successfully function together. Tourism craft cross the waters of the Range to Napali; agriculture benefits from the API lease that relieves the pressure of commercial development interests, and PMRF continues as the #3	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation, and preference for Alternative 1. The potential effects from all alternatives are analyzed and compared in Chapter 3 of the Draft EIS. Also, a comparison of alternatives is included in Section 3.14 (Summary of Potential Environmental Impacts and Mitigation Measures) of the Draft EIS.	General Support, Socioeconomics, Land Use and Access

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				employer -- offering high tech careers while serving as the largest multi-environment instrumented range. Compatible tourism and agriculture activities ensure the viability of this national asset. High density housing and commercial development in the API leased lands create encroachment concerns that limit the effectiveness of PMRF. Therefore, these leased lands should continue without adjustments to preserve compatibility and viability for Hawaii's leading industries.		
27	Susan Wiener	n/a	1	Of the Action Alternatives, I definitely do NOT support Alternative 2 in which the Navy and NASA would purchase acreage on Kauai.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation, and notes your opposition to Alternative 2. The rationale for alternatives development is included in Chapter 2 of the Draft EIS. The potential effects from all alternatives are analyzed and compared in Chapter 3 of the Draft EIS. Also, a comparison of alternatives is included in Section 3.14 (Summary of Potential Environmental Impacts and Mitigation Measures) of the Draft EIS.	Alternatives
28	Lisa Grandinetti	n/a	1	Demilitarize the illegally occupied Kingdom of Hawaii!	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The EIS has been prepared consistent with the U.S. and State of Hawai‘i’s environmental	General Opposition to Navy

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					regulatory framework. The Proposed Action and alternatives are described in Chapter 2 of the Draft EIS.	
29	Don Wilson	USN, Retired	1	Ladies/Gentlemen, Please accept my strong endorsement for US Navy, NASA, Hawaii Air National Guard, FAA, and varied communications assets to continue to use HI State Koke'e Park land, to the benefit of the United States, Hawaii State, and Kauai County. In context, I am a former PMRF Commanding Officer, long since retired, and I have no personal or financial interest in this EIS. That said, given my professional knowledge of the facilities and operations located on the land, I believe these tenants should remain indefinitely – or until their use is no longer required. The US Navy is but one tenant, and Koke'e affords the greatest radar range available, given the height of Makaha Ridge. Being able to "see" great distances from a stable, fixed point assures greater safety, precise tracking, and coordination with other sensors to enhance training, and test and evaluation events. Rescinding authorization to use Koke'e would adversely impact Department of Defense – and other - missions, writ large. There is no viable substitute for this site, and the navy's presence is not just benign; the navy is a very good steward of the land. Indeed, navy assets are so integral to the	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation and recognition of the Navy and NASA's activities as valuable to the community and the land. Section 1.7.5 (Ongoing Community Outreach) of the Draft EIS also describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively.	General Support, Purpose and Need of the Proposed Action, Existing Operations

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				land, feral goats proliferate the property because they are protected – to the chagrin of local hunters who know they cannot access the land. NASA, another tenant at Koke'e, values its assets at Koke'e, and often coordinates its efforts with the US Navy to either support complementary missions, or deconflict concurrent events. I don't speak for NASA, but I know of their efforts, and why they too treasure Koke'e's geographic position and altitude While I do not speak for other federal or HI State agencies also using the Koke'e site, I'm confident they too would/will support continued access, for the same reasons. The FAA, for example, tracks flights into/out of DKI International Airport, as well as trans-Pacific flights originating either from the US Mainland going east to Asia, and flights from Asia to the US Mainland. FAA radars and communications networks are integral and invaluable assets for safe commercial flights. The point remains: USN and other tenants at Koke'e are respectful of the land, the Hawaiian culture, and the contributions their assets bring to the state and nation. Operations conducted at Makaha Ridge do not adversely impact the park land per se, nor appurtenant lands. Strongly recommend existing leases be perpetuated for the reasons stated. D.H. Wilson, USN CAPT, USN (Ret)		

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30	Hayden Hislop	n/a	1	To whom it may concern, I am writing to express my strong opposition to the renewal of the Pacific Missile Range Facility (PMRF) land lease on Kauai. The renewal process has lacked transparency, with inadequate advertising, leading many to believe that the Navy is deliberately avoiding public scrutiny. This lack of due diligence is concerning, especially given the lease terms of just $1 per year, which is far below market value. The state must demand fair market value or more for this land.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Your opposition to the project is noted. As described in Chapter 1 (Purpose of and Need for the Proposed Action) of the Draft EIS, the document has been prepared consistent with state and federal laws and regulations. Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS describes the public review process in detail, including how the Navy and NASA solicited public participation during scoping. This outreach included a 40-day comment period (extended 10 days over the required minimum 30 days), personalized notification letters (174), and multiple consecutive newspaper and social media advertisements (also see Appendices G and H in the Draft EIS). As described in Section 3.6 (Socioeconomics) in the Draft EIS, new real estate agreements would be at current fair market value, and would be determined through negotiations with Board of Land and Natural Resources (BLNR).	General Opposition, EIS Process, Socioeconomics
30	Hayden Hislop	n/a	2	There are critical questions regarding the state's right to lease these lands. The base facilitates activities such as “test” bombing the ocean and minor outlying	In August 2012, beach access along PMRF’s north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized	Cultural Practices, Area of Analysis

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				islands, causing significant ecological damage. The Navy must clarify which Native Hawaiian organizations they are consulting for the mandatory Section 106 Cultural Impact Assessment. Native Hawaiian rights to fish and hunt from the ocean to the mountain without needing identification must also be respected.	access to PMRF to carry out recreational activities such as fishing and surfing. Beach access maybe be limited at times due to public safety and protection of threatened and endangered species. Detailed discussions about cultural practices in the Project Area, and Cultural Impact Assessment (CIA) are described in Section 3.3 (Cultural Practices). Appendix F contains details of all personnel, including Native Hawaiians and Native Hawaiian Organizations, involved in the CIA.	
30	Hayden Hislop	n/a	3	The land currently held by PMRF could be converted into farmland to feed Kauai. Currently, this area is not utilized for agriculture, primarily due to military control and environmental contamination from chemical sprays. These chemicals, including herbicides and other hazardous substances, pose a significant threat to the local environment and public health. The ecological devastation caused by PMRF includes the diversion of water on the Mānā Plain, which disrupts traditional cultural practices and the natural wetland ecosystem. If PMRF were not there, restoring this wetland would involve reestablishing native plant species, reviving traditional taro farming (loʻi kalo), and improving habitat for local wildlife. Such restoration would enhance biodiversity and reconnect	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities are described	Alternatives, Land Use and Access, Biological Resources, Cultural Practices, Hazardous Materials and Waste, Public Health and Safety, Air Quality and Greenhouse Gases

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				the native Hawaiian community with their cultural heritage and traditional land stewardship practices.	in the cumulative analysis (Chapter 4 of the Draft EIS). A history of land use in the project area is included in Section 1.3 (Background) and Section 3.5 (Land Use and Access) of the Draft EIS. Potential effects to public health and safety from the Proposed Action are described in Section 3.9 and potential effects from hazardous materials and waste are described in Section 3.12 of the Draft EIS. As described in Section 1.3.6 (Environmental Management and Stewardship) and Section 4.1 (Introduction to Analysis), the Draft EIS also addresses the present and future Readiness and Environmental Protection Integration (REPI) Programs, including promoting regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds on the Mānā Plain. As described in Section 3.7 (Water Resources) of the Draft EIS, water monitoring on PMRF land (Mānā Plain) occurs quarterly (at a minimum), and all results are publicized via the Agribusiness Development Corporation (ADC) website, dating back to 2020 (https://dbedt.hawaii.gov/adc/manaplain/). Wetland areas containing native and non-native vegetation	

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					and federally protected waterbirds are present on PMRF lands. A wetland delineation was conducted in support of this EIS and can be found in Appendix N. Additionally, the Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS.	
30	Hayden Hislop	n/a	4	Additionally, the presence of PMRF has led to housing displacement for local residents, as military personnel occupy housing that could otherwise be available to Kauai's residents. This displacement exacerbates the housing crisis and impacts the social fabric of our community. Finally, PMRF stands as a symbol of the illegal occupation of Hawaii, a painful reminder of historical injustices that continue to affect native Hawaiians. The facility is also used to train foreign military forces, such as the Israeli Defense Force, further alienating the local community and contradicting our values of peace and sovereignty. For these reasons, I urge you to consider the long-term benefits of repurposing the PMRF land for agricultural use and ecological restoration. This decision would promote food security, environmental sustainability, cultural preservation, and	A discussion about current housing and potential effects to housing can be found in Sections 3.6 (Socioeconomics) of the Draft EIS. The overthrow of the Hawaiian Kingdom and the U.S. military's involvement is discussed in the Draft EIS analysis of impacts to Land Use in Sections 3.5.1.4 (History of Ceded Lands in the ROI) and 3.5.2 (Environmental Consequences). The majority of the Project Area (7,491 acres for which restrictive use easements are proposed) is currently used by other entities who lease this land from the state for agriculture and would continue to be used for agriculture under the action alternatives and No Action Alternative.	Alternatives, Socioeconomics, Biological Resources, Land Use and Access

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				social equity for the people of Kauai. Thank you for your attention to this critical issue. Sincerely, Hayden Hislop		
31	Michael Curtis	n/a	1	No more movies??? Military testing and practices improve our US and Allies performance. Unique test facility--very valuable.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. As described in Chapter 2 of the Draft EIS, Alternatives 1 and 2 would not result in changes to operations, activities, and facilities within the Project Area. The potential effects from all alternatives are analyzed and compared in Chapter 3 of the Draft EIS. Also, a comparison of alternatives is included in Section 3.14 (Summary of Potential Environmental Impacts and Mitigation Measures) of the Draft EIS.	General Support for Navy
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	1	Aloha e Ms. Wells: The Office of Hawaiian Affairs (OHA) is in receipt of the May 2024 Environmental Impact Statement Preparation Notice (EISPN) for the Pacific Missile Range (PMRF) and Kōke'e Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kaua'i. Naval Facilities Engineering Systems Command has prepared this EISPN on behalf of the Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) in accordance with Hawai'i Revised Statutes (HRS) 343 and the National Environmental Protection Act	On behalf of the Navy and NASA, the EIS team thank you for your comments and appreciate your participation during the scoping phase of the EIS.	EIS Process

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				(NEPA). As existing real estate agreements are set to expire between 2027 and 2030, the DON is proposing to retain the use of 8,348 acres of State lands for operational continuity and sustainment (in support of continued military training, testing, and facility operations) at PMRF. NASA also proposes to retain the use of their 23 acres of State lands in support of continued operations including measurements of the Earth's rotation and local land motion at KPGO. The DON's current real estate agreements with the Department of Land and Natural Resources (DLNR) include 684 acres of leaseholds and 7,664 acres of easement lands, for a total of 8,348 acres. Current leases and easements are primarily used for passive encroachment buffers, as well as for mission readiness, access, and utilities at the following five general locations: Main Base, Kamokalā Ridge, Mānā Water Well, Miloli'i Ridge, and Mākaha Ridge. No ground-based training occurs on these parcels. NASA's current real estate agreements with DLNR include 16 acres of leaseholds and 7 acres of easement lands, for a total of 23 acres. NASA issued the DON a Use Permit in 2016 for portions of KPGO to conduct radar, telemetry, and communications services in support of PMRF operations. Additionally, the Navy and NASA conduct environmental management and stewardship activities		

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				on these lands. The OHA is the constitutionally established body responsible for protecting and promoting the rights of Native Hawaiians. OHA has substantive obligations to protect the cultural and natural resources of Hawai'i for its beneficiaries. Accordingly, OHA is required to (1) serve as principal public agency in the State of Hawai'i responsible for the performance, development and coordination of programs and activities relating to native Hawaiians and Hawaiians; (2) assess the policies and practices of other agencies impacting native Hawaiians and Hawaiians; and (3) conduct advocacy efforts for native Hawaiians and Hawaiians. OHA provides the following comments pertaining historic preservation coordination, biological surveys, alternatives analysis and restoration component, ceded land trust considerations, and the recordation of comments:		
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	2	Historic Preservation Cooridnation The EISPN indicates that cultural resources will be identified for National Historic Preservation Act (NHPA) eligibility and HRS Chapter 6E significance. While it appears State and Federal level historic preservation compliance is required, there is no clear timeline for coordination of NHPA, HRS 6E, and NEPA compliance. It is further not clear how findings from NHPA	Navy policy, per its Environmental Readiness Program Manual (OPNAV-M 5090.1 Section 13-3.9), is to complete National Historic Preservation Act (NHPA) Section 106 consultations and agreement documents prior to the publication of the final environmental impact statement (EIS) and before signature of any record of decision. The Navy	Cultural Practices, Archaeological and Architectural Resources

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				and HRS 6E will be utilized in informing the NEPA document, especially in regards to the identification of adverse impacts to historic properties and cultural resources. Fortunately, the Advisory Council on Historic Preservation (ACHP) and Council on Environmental Quality (CEQ) did issue a handbook in March 2013 for assisting Federal agencies on integrating NEPA and Section 106 reviews. Notably, the handbook recommends coordinating the planning schedules for both NEPA and Section 106 processes as NHPA is needed to properly inform the NEPA document on possible impacts to historic properties. The handbook specifically states that, "an EA [environmental assessment] includes the Section 106 focus on which part of the proposed action could specifically affect a historic property and describes how the resource might be affected… To coordinate Section 106 and an EA, an agency would use the Section 106 adverse effect criteria in evaluating and describing effects on historic properties. Agencies may also find it helpful to relate adverse effects under Section 106 to criteria for determining the significance of impacts under NEPA... Any treatment and mitigation measures developed through the Section 106 process should be referenced in the EA and documented in a MOA [memorandum of agreement] or PA [programmatic agreement] developed in consultation with consulting parties."	is applying this policy to Hawai'i Revised Statutes (HRS) 6E and HRS 343 for this EIS. The NHPA, HRS 6E, and HRS 343 processes are being coordinated following the advice in the 2013 Advisory Council on Historic Preservation (ACHP)/Council on Environmental Quality (CEQ) handbook per OPNAV-M 5090.1 policy. This coordination is integrated into the EIS schedule, and the results of Section 106 and HRS 6E consultations are being used to prepare relevant analyses in the EIS.	

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				Thus, OHA recommends that the EIS have a clear timetable and explanation for NEPA and NHPA coordination, with enough time allotted for substantial completion of NHPA to effectively detail identified historic properties, impacts, and mitigations within the NEPA document.		
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	3	While OHA does recognize that the State level processes for HRS 6E and 343 are separate, we have been supportive of the HRS 6E process being completed or at least initiated first to assist in properly informing the environmental review process. This is commensurate with Federal level guidance on NHPA. The intent of HRS Chapter 343 is to ensure a project's impact to the environment is fully considered in the planning process and to integrate mitigation where needed to minimize significant environmental harm. Surveys are conducted to identify various environmental components (i.e., flora, fauna, historic properties) so that any adverse impacts from the proposed action can be evaluated. In determining whether historic properties will be adversely impacted, the HRS 6E review process is essential to identifying historic sites and generating mitigation commitments in consultation with the State Historic Preservation Division (SHPD). Any identified sites and resulting mitigations made during the HRS 6E review process are typically included in	Consultation with the Department of Land and Natural Resources (DLNR) State Historic Preservation Division (SHPD) is ongoing by both the Navy and NASA. Identification and evaluation of historic properties pursuant to Hawai'i Administrative Rules 42 and National Historic Preservation Act (NHPA) is in progress, and the results are included in Section 3.2 (Archaeological and Architectural Resources) of the Draft EIS. Section 3.2 of the Draft EIS also describes potential effects to these resources from the Proposed Action. Biological surveys are regularly conducted by PMRF Natural Resource Staff. Section 3.4 (Biological Resources) of the Draft EIS includes a description of existing natural resources in the region of influence (ROI) and potential effects to those resources from the Proposed Action.	Cultural Practices, Archaeological and Architectural Resources, Biological Resources

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				the environmental review for an adverse impact analysis and public comment.		
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	4	Hawai'i Administrative Rules (HAR) 11-200.1-18(d)(7) and (8) requires that impacts be identified and proposed mitigations be included within an environmental assessment. If HRS 6E is conducted after the HRS 343 process, impacts to historic and cultural resources cannot be fully identified as the statutory process to identify these environmental components is not yet completed. Furthermore, since mitigation for any adverse effects to historic properties and cultural resources are made as a result of consultation with SHPD through the HRS 6E process, proposed mitigations from this statutory process cannot be included in environmental review documents if HRS 6E is not completed first. OHA thus questions the completeness of any environmental review for projects that have not yet undergone HRS 6E review. As one of the key pillars of HRS 343 is to allow for public comment on a proposed action, deferring the HRS 6E review process to take place after HRS 343 review could hide the presence of historic properties and cultural resources that are important to Native Hawaiians from our beneficiaries and the general public. As the opportunity to include possible adverse impacts and mitigations in an environmental review would be foreclosed, our beneficiaries would not be	Consultation with the State Historic Preservation Division began on September 7, 2023.	Cultural Practices, Archaeological and Architectural Resources

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				fully informed on the proposed action when environmental review documents are specifically provided for comment. Thus, OHA recommends that the draft EIS (DEIS) demonstrate HRS 6E compliance in a way that ensures historic properties are properly identified, and mitigation provided for any adverse impacts. Further, if not done so already, OHA encourages consultation with the SHPD as soon as practicable.		
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	5	Biological Surveys The EISPN does acknowledge that there are Endangered Species Act (ESA) species in the region, that include the Hawaiian hoary bat ('ope'ape'a), nēnē goose, pueo, Newell's shearwater, Hawaiian petrel, and the band-rumped storm petrel. In regards to rare state-recognized endemic forest birds, the EISPN mentions that the scarlet honeycreeper or 'i'iwi, 'apapane, and 'amakihi have been observed in the Kaunuohua Ridge. Five Federally listed plants were also noted in the Mākaha Ridge, that includes the Ni'ihau lobelia, makou, Hawai'i scaleseed, dwarf iliau, and the mā'oli'oli. The EISPN states that potential impacts to biological resources will be evaluated. OHA recommends that any biological surveys done to determine the presence of any species must take into account seasonal considerations, be up-to-date, compare results with past surveys, and even obtain knowledge from cultural	Data collected from previous and recent biological surveys are discussed in Section 3.4 (Biological Resources) in the Draft EIS, including the results of biological surveys conducted in support of this project. As described in Section 3.4, biological surveys were conducted at various seasons throughout the year. Appendix M of the Draft EIS includes the full reports. A Cultural Impact Assessment (CIA) has been prepared for the project. The CIA is discussed in Section 3.3 (Cultural Practices) and included as Appendix F of the Draft EIS. Consultation by the Navy and NASA with United States Fish and Wildlife Service (USFWS) and Division of Forestry and Wildlife (DOFAW) is underway for this EIS.	Biological Resources, Cultural Practices

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				practitioners (with vast generational knowledge on cultural resources in the area). In regards to the latter, consultation with cultural practitioners could either be done directly or integrated with the cultural impact assessment (CIA). If not done so already, OHA recommends early consultation with both the United States Fish & Wildlife Service (FWS) and the State of Hawai'i DLNR Division of Forestry and Wildlife (DOFAW). Both entities have vast knowledge regarding endangered and threatened species, and can offer guidance on Federal and State level compliance. DOFAW may perhaps have contacts with knowledgeable cultural practitioners as well to aid in producing the most accurate biological surveys.		
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	6	Alternatives Analysis and Restoration Component The EISPN currently details that 2 long-term alternatives and one no action alternative will be explored in the DEIS. It would appear that there is not much difference between Alternatives 1 and 2 except for Alternative 2 suggesting a fee simple acquisition of 700 acres of leasehold lands. There is no alternative proposing a shorter lease term. OHA argues that a meaningful analysis of a shorter-term lease option should be included in the DEIS as constant renewal of a long-term lease creates the appearance of de facto ownership.	The EIS team understands the public's awareness and concern regarding military actions and their ability to be good stewards of the land; especially on state lands with recent events is at a high alert. Section 1.7.5 of the Draft EIS lists the current Ongoing Community Coordination that takes place amongst the PMRF staff, and the mitigation measures as listed in Chapter 5, list the current mitigations that would fall under each alternative. In addition to mitigation measures, which apply to only those resources that have been	Alternatives

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				As you are likely aware, the public's trust in the military has been shaken with recent events like the diesel fuel spill atop Haleakalā and the Red Hill fuel leak on Oʻahu. Thus, there is a greater level of public awareness and concern regarding the military's actions and their ability to be good stewards of the land. This is especially true for military operations on State lands. As such, the military must strive to build back public trust and confidence by perhaps undertaking projects that are smaller in scope and easier to manage. Such projects could further include robust restoration components to properly demonstrate that the military can effectively restore lands after they are used for military operations. Currently, the EISPN seems to suggest the possibility that if leases aren't renewed, that the DON might abandon infrastructure in place. This is unacceptable and further serves to create a liability for the State. For this reason, OHA recommends a more moderate (short-term lease) alternative option that can still accomplish bare minimum mission requirements for the military. But, perhaps more importantly, all alternatives should include a robust restoration component that shows how lands can be restored post military use, especially for lands owned by the State.	identified to have significant adverse impacts from the Proposed Action and alternatives; the Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. "Abandon in place" (this verbiage has been removed from the Draft EIS), is listed in the current lease agreement, but as such, the Department of the Navy (DON) would not create any liabilities for the state and as discussed in the Draft EIS, Section 2.3.3 - Alternative 3, "any return of state property would involve complex negotiations with the state to determine the condition of the returned lands, what infrastructure would remain, whether any remediation or restoration would be required and the extent thereof, and the transfer of various environmental and cultural responsibilities now performed by Navy and NASA back to the State." Chapter 2 of the Draft EIS includes a description of Alternatives 1 and 2 as well as other alternatives that have been considered but dismissed. Alternatives contemplating smaller footprint and shorter duration real estate agreements were considered	

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					but eliminated from detailed analysis as described in Section 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis) of the Draft EIS. After this comment from the Office of Hawaiian Affairs (OHA) was received, another alternative for a shorter duration was considered. Please see Section 2.4.3 for the reasons this alternative was not carried forward for further analysis in the Draft EIS. Please note, long term is defined as anything over 25 years. In Chapter 3 of the Draft EIS, the analysis includes the permanent loss of state land through fee simple retention and how that differs from retention through non-permanent mechanisms such as leases, etc., and identifies effects to these land retention mechanisms in the Draft EIS. Consideration of how these mechanisms could be received by the public in the unique historic context of the affected environment are analyzed in Section 3.5 (Land Use and Access) of the Draft EIS. Terms of leases and easements in regards to responsibility of the Navy and NASA can be found in Appendix A of the Draft EIS. Additionally, the relevant Best Management Practices (BMPs), Standard Operating Procedures (SOPs), management	

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					strategies, and plans that apply to Navy and NASA activities in the project area are described in Section 2.5 (Best Management Practices) of the Draft EIS. Section 2.3.3 (Alternative 3) of the Draft EIS includes a description of the No Action Alternative, including the loss of mission and process steps.	
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	7	Ceded Land and Conservation District Considerations The EISPN mentions that land leased and in easement by the DON and NASA are classified as conservation or agricultural district lands. OHA notes that these State lands are also "ceded" lands as described in Section 5 of the Admissions Act. In regards to OHA's own trust responsibilities, we have a vested interest in ceded lands that are part of the public land trust. Per the State of Hawai'i Constitution, Article XII, Sections 5 and 6, the OHA trustees exercise their power "to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiian, including all income and proceeds from that pro rata portion of the trust referred to in section 4 of this article for native Hawaiians…". Affirmation of OHA's public trust duties are further captured in Hawai'i Revised Statutes (HRS) Chapter 10 to assess the	Section 3.5 (Land Use and Access) of the Draft EIS includes a discussion of the History of Land Tenure and Use in the project area including the Public Land Trust established in Section 5 of the Admission Act and the Proposed Action's consistency with Public Trust Obligations. The Department of Land and Natural Resources (DLNR) conducts monitoring and inspections of the Navy and NASA leaseholds and easement lands. Solicitation of past DLNR monitoring and inspection records at PMRF should be made directly to DLNR. Regarding consultation with Office of Conservation and Coastal Lands (OCCL), Section 1.7.4 (Intergovernmental Coordination) of the Draft EIS discusses coordination with OCCL. Sections 3.5 (Land Use) and Section 6.1 (Consistency with Government Plans and Policies) of the Draft EIS discuss the project's	Land Use and Access

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				practices of other agencies and advocate where necessary to make recommendations that limit or eliminate potential irrevocable harm to cultural resources and the public land trust. As such, OHA must be consulted as part of the lease renewal process and included in discussions with the DLNR. We advise that the DEIS include direct mention of this process. As the DON and NASA have utilized these State parcels for decades, it is unclear if the State has been actively conducting periodic monitoring and site visits of these lease areas as an essential component of the State's duty to protect and preserve trust land is an obligation to reasonably monitor a third party's use of the property. To hold otherwise would permit the State to ignore the risk of impending damage to the land, leaving trust beneficiaries powerless to prevent irreparable harm before it occurs. Unless the condition of these lands is independently determined by the State, the State should arguably not entertain a process seeking renewal. Ignoring this obligation would show a disregard for the State's trust responsibilities. Procedurally, the DEIS should address any possible concerns noted by the State via an independent inspection or if an inspection is pending, detail the timeline for such inspections and subsequent report disclosures; in turn, the public would be	consistency with state laws and regulations.	

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				allowed to comment via the HRS 343 process on how these deficiencies are being corrected or not. As you are likely aware, the military use of State lands at the Pōhakuloa Training Area (PTA), on Hawai'i Island, was challenged in court recently (see Ching v Case). In 2019, the court ordered the State of Hawai'i DLNR to prepare a management plan that must include provisions for periodic monitoring of these lands as to ensure fulfillment of State trust responsibilities. OHA would assume that provisions for the State to independently conduct periodic monitoring and site visits at PTA would apply to other State lands leased by the military. In regards to conservation district use, OHA recommends that consultation with DLNR's Office of Conservation and Coastal Lands (OCCL) should already be occurring to determine what types of compliance actions are necessary to enable military utility use. This should be fully discussed in the DEIS. Arguably, it is unclear how military use is consistent with conservation district zoning uses.		
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	8	Recordation of Comments HAR 11-200.1-24(s)(1) states that a DEIS shall include "reproductions of all written comments submitted during the consultation period required in section 11-200.1-23." Typically, state level DEIS's or DEA's will provide copies of all written comments as they were originally	Unaltered public comments received during the public scoping comment period, as well as comments summarized by category, are included in Appendix I of the EIS.	EIS Process

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				received. OHA believes that while some agencies sometimes opt to recreate or summarize comments in their own formats, the intent of the rules is to include actual copies to demonstrate that comments were unaltered and applicable to the public scoping or early consultation process for HRS 343 compliance. As such, please include unaltered copies of any written comments received as part of public scoping meetings or in response to the EISPN.		
32	Stacey Ferriera	State of Hawai'i Office of Hawaiian Affairs	9	Closing Remarks Mahalo for the opportunity to comment. OHA looks forward to seeing our comments taken into consideration as the DEIS is being prepared. Should you have any questions, please contact OHA's Lead Compliance Specialist, Kamakana C. Ferreira at (808) 594-0227 or by email at kamakanaf@oha.org. 'O wau iho nō me ka 'oia 'i'o, Stacy Ferreira, Ka Pouhana, Cheif Executive Officer	Mahalo, Kamakana, for providing these comments. The Office of Hawaiian Affairs (OHA) comments were taken into consideration in the preparation of the Draft EIS. We look forward to continued coordination with OHA during development of the Final EIS.	EIS Process
33	Dayna Vierra	DLNR, Land Division	1	Thank you for the opportunity to review and comment on the subject Environmental Impact Statement Preparation Notice (EISPN). The Land Division offers the following comments: 1. Section 1.1 (Project Introduction and Overview), first paragraph, includes a statement that the Draft Environmental Impact Statement (EIS) is being prepared "in coordination with the Hawai'i Department of Land and Natural	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. The statement has been updated in the Draft EIS to clarify the roles of each agency.	EIS Process

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				Resources". The Department of Land and Natural Resources (DLNR) emphasizes that it is not assisting the Navy with the preparation of their Draft EIS. As the accepting authority, Staff is available for questions regarding the EIS process and DLNR will provide comments on the EIS during the official public comment period(s).		
33	Dayna Vierra	DLNR, Land Division	2	2. Section 1.1, page 1-3, paragraph 2, states: "As requested by and in coordination with DLNR, the Navy and NASA identified that an EIS is the appropriate level of environmental review for the Proposed Action…" The DLNR would like the Draft EIS to clarify that the DLNR did not make the initial determination. The Navy proposed the preparation of an EIS and the DLNR concurred with the decision. Further, we note that the referenced email is in regard to our initial review of the EISPN for compliance with Hawai'i Administrative Rules (HAR) Chapter 11-200.1 prior to the publication of the EISPN in Environmental Review Program's (ERP's) The Environmental Notice and does not pertain to the DLNR making any determination regarding the need for an EIS.	The Draft EIS has been revised in Section 1.1 (Project Introduction and Overview) to clarify: "The Navy and NASA determined that an EIS is the appropriate level of analysis for the Proposed Action."	EIS Process
33	Dayna Vierra	DLNR, Land Division	3	3. Section 1.1, page 1-3, paragraph 4, states that: "For this Proposed Action, DLNR is responsible for issuing leases and easements to the NAVY and NASA. DLNR is the agency with the responsibility for	Language has been revised in Section 1.1 (Project Introduction and Overview) of the Draft EIS to clarify: "The State of Hawai'i Board of Land and Natural Resources (BLNR) is the	EIS Process

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				approving the real estate action since the State lands are under the management of DLNR's Land Division. DLNR is required to conduct an environmental review of this Proposed Action." We wish to clarify that while the DLNR, Land Division is responsible for processing land dispositions, it is ultimately the Board of Land and Natural Resources' (BLNR's) decision to approve or deny any such land disposition actions.	approving agency and as such, issues an approval prior to implementation of the Proposed Action (HAR Section 11-200.1-2, 11-200.1-7(c))."	
33	Dayna Vierra	DLNR, Land Division	4	4. In the forthcoming Draft EIS, please describe the type of "surveillance and tracking" that occurs at Kōkeʻe Park Geophysical Observatory (KPGO), as indicated in Section 1.2 (Project Area). Also, please clarify what is being surveilled and tracked as well as the purpose of the backup power generation.	Section 1.2 (Project Area) of the Draft EIS has been revised for clarification at KPGO to: leaseholds (16 acres) and easements (7 acres) used for NASA geodetic data collection and for Navy backup power generation, to provide consistent power during critical Navy missions as well as PMRF surveillance and tracking. Additionally, an elevated line-of-site at the KPGO site is required for PMRF to maintain surveillance and tracking of airborne and surface units operating offshore of PMRF and that are beyond the range of the surveillance and tracking from the radars as Mākaha Ridge. Surveillance is primarily for safety reasons – ensuring no surface vessels, aircraft, or personnel are in the hazard area and tracking is for determining location of an object (i.e., missile test intercept). PMRF also has Flight	Existing Operations

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					Termination System (FTS) telemetry at KPGO which is required by Range Safety for all missile launch events.	
33	Dayna Vierra	DLNR, Land Division	5	5. Section 1.3.3 (Navy Mission at PMRF) states that: "The Navy conducts missile systems tests and has supporting facilities to track and evaluate these tests from the ocean floor to the outer atmosphere." Please include in the Draft EIS, what is involved in the missile systems tests and how it affects the water, land, and air, etc. Please also clarify what are the "supporting facilities" that track and evaluate the tests. 6. Section 1.3.3 also mentions that testing occurs on the "ocean floor." Staff notes that the original lease contains an ocean right of way lease for 7,680 acres, but the current Proposed Action does not include those lands. Please explain in the Draft EIS why these submerged lands are no longer included.	As described in Section 1.3.5 (Navy and NASA Use of State Lands) in the Draft EIS, the land-based weapons systems are located on the PMRF fee simple parcels. The Navy conducts missile systems tests from the fee simple parcels, and supporting facilities that track and evaluate these tests are located on the leaseholds and easement lands at Mākaha Ridge and KPGO which is within the Project Area. These tracking operations, and other activities on the leaseholds and easement lands, are covered in this EIS analysis. Section 1.1 (Project Introduction and Overview) of the Draft EIS clarifies that the Navy holds a lease for 7,680 acres of submerged lands in an ocean Right-of-Way (ROW) at PMRF but is not pursuing a new real estate agreement for this area. The Draft EIS states the Navy will continue to use this area 31 pursuant to Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq., and U.S. 32 Constitution Article I, Section 8, Clause 3.	Existing Operations, Proposed Action, Biological Resources, Water Resources, Air Quality and Greenhouse Gases, Public Health and Safety
33	Dayna Vierra	DLNR, Land Division	6	7. Section 1.3.5 (Navy and NASA Use of State Lands) makes reference to a Figure 1-4, however, it would appear that the	Figures D-1 through D-6 have been added to Appendix D to depict the	Proposed Action, Appendix D

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				figure and what is supposedly being described in Appendix D do not coincide. Please revise the figure to show the applicable leaseholds and easements as described in Appendix D.	applicable leaseholds and easement lands.	
33	Dayna Vierra	DLNR, Land Division	7	8. While we appreciate Table 2-1 (Section 2.2 Alternative Screening Process) and the descriptions given for each alternative, we believe that Alternative 1 and Alternative 2 are essentially the same action as the only difference is the land tenure mechanism (lease versus fee). While we agree that there may be different impacts given the land tenure mechanism, the DLNR would appreciate it if the Navy and NASA would analyze an additional alternative that would consider a modified Proposed Action.	In Chapter 3 of the Draft EIS, the analysis includes the permanent loss of state land through fee simple retention and how that differs from retention through non-permanent mechanisms such as leases, etc., and identifies effects to these land retention mechanisms in the Draft EIS. Consideration of how these mechanisms could be received by the public in the unique historic context of the affected environment are analyzed in Section 3.5 (Land Use and Access) of the Draft EIS. Chapter 2 of the Draft EIS includes a description of Alternatives 1 and 2 as well as other alternatives that have been considered but dismissed. Alternatives contemplating smaller footprint and shorter duration real estate agreements were considered but eliminated from detailed analysis as described in Section 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis) of the Draft EIS. After the comments from Office of Hawaiian Affairs (OHA) and Department of Land and Natural Resources (DLNR) Land Division was received, another	Alternatives, Proposed Action

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					alternative for a shorter duration was considered. Please see Section 2.4.3 for the reasons this alternative was not carried forward for further analysis in the Draft EIS. In Chapter 3 of the Draft EIS, the analysis includes the permanent loss of state land through fee simple retention and how that differs from retention through non-permanent mechanisms such as leases, etc., and identifies effects to these land retention mechanisms in the Draft EIS. Consideration of how these mechanisms could be received by the public in the unique historic context of the affected environment are analyzed in Section 3.5 (Land Use and Access) of the Draft EIS.	
33	Dayna Vierra	DLNR, Land Division	8	9. In Section 2.3.1 (Alternative 1: Succeeding Current Real Estate Agreements), it states that "the Navy and NASA would continue to adhere to applicable federal and state laws as well as policies and regulations applicable to Navy and NASA regarding investigation, removal, and cleanup of hazardous and toxic materials and wastes". In the Draft EIS, please include a discussion on the environmental impacts of removal and cleanup of hazardous and toxic materials and wastes.	Section 3.12 (Hazardous Materials and Waste) of the Draft EIS includes a robust discussion on the environmental impacts of removal and cleanup of hazardous and toxic materials and wastes under the No Action Alternative. Section 3.12 also discusses potential impacts from hazardous materials and wastes from the other action alternatives as cleanup of hazardous and toxic materials and wastes are part of the Proposed Action.	Hazardous Materials and Waste
33	Dayna Vierra	DLNR, Land Division	9	10. Regarding Table 2-6, please provide the status of any surveys or programs that are supposedly implemented as a part of	Section 2.5 (Best Management Practices) in the Draft EIS includes the status of surveys and programs	BMPs

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				the Best Management Practices (BMPs) and/or management strategies as well as how often reoccurring surveys or consultation take place.	that are implemented by the Navy and NASA at PMRF and KPGO. Table 2-6 in the Draft EIS includes management strategies identified from the PMRF Integrated Natural Resource Management Plan (INRMP), as well as information on how often reoccurring surveys or consultations take place. The INRMP serves as a repository for natural resource information, provides guidance on how PMRF is to meet compliance requirements, and sets management goals, required actions, and resources necessary to protect and manage the installation's natural resources. The 2023 INRMP for the Islands of Kaua'i, Ka'ula, and Ni'ihau can be found online at www.pmrf-kpgo-eis.com. As described in Table 2-6 and Section 3.4 (Biological Resources) of the Draft EIS, various biological surveys, such as green sea turtle nesting, monk seal haul outs, invasive/endangered plant, and acoustic bat monitoring regularly occur on PMRF lands. Management strategies related to cultural or architectural resources through implementation of the Integrated Cultura Resources Management Plan (ICRMP) are identified in Table 2-6. The ICRMP is a plan that provides coordinated	

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					management of PMRF's mission with stewardship of cultural resources on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. A column has been added to Table 2-6 that provides the status of surveys and programs that are implemented as a part of the Best Management Practices (BMPs) and/or management strategies. A column has also been added to Table 2-6 that lists how often reoccurring surveys or consultations take place. Table 2-7 in the Draft EIS includes a list of Plans, Instruction Memoranda, and Operating and Maintenance Procedures (OMPs) applicable to the Navy's operations on the leaseholds and easement lands and the frequency of implementation.	
33	Dayna Vierra	DLNR, Land Division	10	11. The 2nd paragraph in Section 3 (Project Setting) appears to either reference two separate documents or a later version of the same document. It states that the impacts to airspace, marine navigation, and marine resources from existing training and testing will be in the Hawai'i-Southern California Training and Testing Final EIS/OEIS. Any additional analysis of future at-sea training and testing will be found in the proposed Hawai'i-Southern California Training and Testing Final EIS/OEIS. Please clarify this in the Draft EIS.	Reference to the 2018 HSTT and 2025 HCTT has been removed from Section 3 of the Draft EIS. Section 3.1.6 (Relevant NEPA and Hawai'i Environmental Policy Act [HEPA] Documents Considered in the Analysis) of the Draft EIS identifies that Appendix K includes a list of all previous HEPA and NEPA documents that have been referenced in the Draft EIS.	Biological Resources

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33	Dayna Vierra	DLNR, Land Division	11	12. In Section 3.1 (Archaeological and Architectural Resources), please be sure to include any findings regarding ʻiwi kūpuna when doing archaeological surveys.	Section 3.2 (Archaeological and Architectural Resources) of the Draft EIS includes a summary of all archaeological and architectural resources in the region of influence (ROI) (with the full report included in Appendix F), and Section 3.3 (Cultural Practices) includes a description of all the cultural practices in the ROI. Section 1.7.5 (Ongoing Community Coordination) of the Draft EIS includes reference to ongoing coordination with Native Hawaiian Organizations (NHOs) regarding discoveries of human skeletal remains, and ongoing coordination with NHOs on construction of Lua Kupapaʻu O Nohili (Nohili Burial Crypt) and ongoing coordination for repatriation.	Archaeological and Architectural Resources
33	Dayna Vierra	DLNR, Land Division	12	13. In Section 3.2 (Cultural Resources), there is mention of past and present cultural practices that have been identified through prior consultation with Native Hawaiian organizations and other stakeholders. In the Draft EIS, please include the names of those that have already been consulted with as well as those who have been consulted specifically in regard to the Cultural Impact Assessment (CIA) and their lineal ties to the project area. In addition, the DLNR requests that the Navy and NASA consult with the State Aha Moku.	Section 3.3 (Cultural Practices) and Appendix F (Cultural Impact Assessment) in the Draft EIS documents individuals consulted. The Cultural Impact Assessment (CIA) also includes an appendix with biographical information about the interviewees. Section 1.7.5 (Ongoing Community Coordination) identifies individuals and groups that PMRF partners with, including non-profit organizations and Native Hawaiian Organizations (NHOs), for events such as beach clean ups and Native	Cultural Practices, Consultation

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					Hawaiian cultural practices, respectively.	
33	Dayna Vierra	DLNR, Land Division	13	14. In Section 3.3 (Biological Resources) of the Draft EIS, please define the area of interest.	Figure 3.4-1 in the Draft EIS depicts Biological Resources in the region of influence (ROI) at PMRF and KPGO in Section 3.4 (Biological Resources). Surveys included vegetation and wetland delineation and can be found in Appendices M and N, respectively, in the Draft EIS.	Biological Resources
33	Dayna Vierra	DLNR, Land Division	14	15. Based on the description of Figure 3.3-1 in Section 3.3, 2 and paragraph, the figure should also include the noted interconnected system of irrigation ditches.	Figure 3.7-4 in Section 3.7 (Water Resources) is included in the Draft EIS and depicts the interconnected system of irrigation ditches (mostly on Agribusiness Development Corporation [ADC] land).	Water Resources
33	Dayna Vierra	DLNR, Land Division	15	16. Regarding Section 3.6 (Environmental Justice), in the Draft EIS, please provide some examples of the demographic and socioeconomic indicators that will identify potentially disadvantaged communities.	Section 3.6 (Socioeconomics) in the Draft EIS includes examples of the economic indicators of employment in income in the region of influence (ROI) that identify potentially disadvantaged communities. Regarding concerns related to environmental justice, please see the introductory paragraph on page I-1 of this appendix.	Socioeconomics
33	Dayna Vierra	DLNR, Land Division	16	17. In Section 3.7 (Water Resources) of the Draft EIS, please include a discussion on the methodology of how potential impacts to water resources were evaluated.	Section 3.7 (Water Resources) in the Draft EIS includes a discussion on the methodology of how potential effects to water resources were evaluated.	Water Resources
33	Dayna Vierra	DLNR, Land Division	17	18. In Section 3.8 (Utilities), please identify (location and ownership) the “existing wells” that serve Kamokalā Ridge, Mākaha Ridge, and KPGO.	Section 3.8 (Utilities) in the Draft EIS identifies (location and ownership) the “existing wells” that are known in the region of influence (ROI).	Utilities

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33	Dayna Vierra	DLNR, Land Division	18	19. In Section 3.9 (Public Health and Safety) please provide the following: • Paragraph 3 mentions establishment of Ground Hazard Areas (GHAs) and Launch Hazard Areas over water. Please clarify if and/or how this is related to the ocean right of way lease that was mentioned in our earlier comment. • Paragraph 5 mentions safety procedures to prevent unintentional or unauthorized detonation of ordnance. Please include a description of these procedures in the Draft EIS. • Paragraph 6 talks about the transportation and handling of ammunitions, explosives, and hazardous materials. It further mentions that all ordnance is transported in compliance with PMRF Instruction 8023.G and U.S. Department of Transportation regulations. Please provide these documents or a discussion regarding these rules and regulations.	The Draft EIS Section 3.9 (Public Health and Safety) includes the following: • The Ground Hazard Areas (GHAs) and Launch Hazard Areas over water are not related to the ocean right-of-way (ROW). The ocean ROW is the ROW for the communication cables for the ocean ranges. • Ordnance is transported in compliance with PMRF Instruction 8023.G and U.S. Department of Transportation regulations. Ordnance transportation procedures are outlined in the Draft EIS in Section 3.9. PMRF Instruction 8023.G contains sensitive information and cannot be distributed. Relevant Plans, Instruction Memorandum, and Operating and Maintenance Procedures are provided in Section 2.5 (Best Management Practices) of the Draft EIS. Discussion regarding compliance with these rules and regulations is in Section 3.9 (Public Health and Safety).	Public Health and Safety, Transportation
33	Dayna Vierra	DLNR, Land Division	19	20. Please note that on Page 3-14, Section 3.10.1 (Air Quality), all the other elements listed in the first paragraph have their abbreviated symbol except lead (Pb).	The abbreviation symbol for lead has been added in the Draft EIS.	Air Quality and Greenhouse Gases

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33	Dayna Vierra	DLNR, Land Division	20	21. In Section 3.12 (Hazardous Materials and Wastes), it mentions that used oil is taken to the Main Base to be recycled. In the Draft EIS, please provide the procedures followed in the event of an oil spill during transport. Also, please provide a copy or access to the various hazardous materials management plans that are mentioned in this section.	An overview of the Navy's procedures that would be followed in the event of an oil spill per the PMRF Oil and Hazardous Substance Spill Contingency Plan can be found in Section 3.9 (Public Health and Safety) of the Draft EIS. This Plan contains sensitive information and cannot be publicly distributed. However, the Plan outlines procedures to be followed in the event of a spill (in flow chart form), and is available on the PMRF KPGO EIS website, www.pmrf-kpgo-eis.com.	Hazardous Materials and Waste
33	Dayna Vierra	DLNR, Land Division	21	22. Non-common words or actions - There are several instances in the document where there is use of potentially non-common words or actions. It would be appreciated if you were to include either definitions of the words or explanations of the actions. For example, in Section 1.1 the term “local land motion” is used. A definition or explanation on what local land motion is would be beneficial. Also, in Section 1.2, there is mention that Miloliʻi Ridge is used for radar and telemetry activities. It would be helpful if there was an explanation of what telemetry activities are.	A glossary is included in the Draft EIS (Appendix A), which describes potentially non-common words or actions.	Definitions
33	Dayna Vierra	DLNR, Land Division	22	23. Acronyms - The acronyms for Office of Planning and Sustainable Development (OPSD) and the Space Exploration Network Services and Evolution (SENSE), are not included in the main document	The Draft EIS has been reviewed and all abbreviations and acronyms have been added.	Acronyms

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				and on the Abbreviations and Acronyms page (vii). A further review of the document may be warranted to check if there are other omissions.		
33	Dayna Vierra	DLNR, Land Division	23	24. Hawaiian Diacritical Markings – In Section 1.3.1, the Hawaiian diacritical mark (the kahako) is missing from the word Kalākaua. A further review of the document may be warranted to check if there are other omissions. Should you have any qeustions or concerns regard this correspondence, please contact Dayna Vierra aof the Land Division at (808) 587-0423. Sincerely, Russell Y. Tsugi, Administrator Land Division.	The Draft EIS has been reviewed to ensure the use of Hawaiian diacritical markings is consistent throughout. Mahalo, Dayna, for providing these comments. The Department of Land and Natural Resources (DLNR) Land Division comments were taken into consideration in the preparation of the Draft EIS. The EIS team looks forward to continued coordination with DLNR Land Division during development of the Final EIS.	Diacriticals
34	Kendall Tucker	State of Hawai'i, Division of Aquatic Resources	1	Thank you for providing DAR with the opportunity to comment. During the EIS process, DAR would like to request that all streams, waterways, and ocean resources be delineated in the map of the proposed area. Any potential impacts should be discussed, any threatened and endangered species that can be found in the area should be identified, and mitigation measures should be proposed, as is typical of an EIS. DAR looks forward to reviewing the EIS after it is prepared.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Streams, waterways (irrigation ditches), wetlands, and aquifers will be delineated in figures in Section 3.7 (Water Resources). Impacts to biological resources, such as threatened and endangered species, and related mitigation measures, are discussed in Section 3.4 (Biological Resources). The scope of this EIS encompasses territorial leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. Exceptions to marine resources include endangered species, monk	Water Resources, Biological Resources

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					seals and sea turtles, which utilize the terrestrial region of influence (ROI) covered in the scope of this EIS.	
35	Linda Oshiro	n/a	1	I was not able to attend the Kekaha meeting due to conflicting obligations. I have lived in Hawaii 54 years, with the last 10 years next to the ocean in Kekaha. Your military activities, your electromagnetic surveillance of the coast, affects my personal energy field with excess stimulating energy that makes sleep difficult. It was proved your use of sonar affected the dolphins and whales. You seem not to care what your microwave radar towers or electromagnetic surveillance does to the human population I am aware of the harm created by your activities and the target you have made of us and what a large landowner you have become and i am not happy with your presence Linda Oshiro	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. We value your concerns. As described in Chapters 1 and 2 of the Draft EIS, the scope of the EIS includes terrestrial leaseholds and easement lands; therefore, marine resources, such as dolphins and whales, are not covered in the scope of this EIS. Potential effects from the Proposed Action to marine resources, including the endangered monk seal and sea turtle that utilize the terrestrial region of influence (ROI), are described in Section 3.4 (Biological Resources) of the Draft EIS. As described in Section 3.9 (Public Health and Safety) in the Draft EIS, civilians and base personnel are excluded from the radiation hazard area, and warning signs are posted during operations for public safety.	General Opposition, Public Health and Safety, Biological Resources, Existing Operations
36	Melissa Nash Family	n/a	1	My name is Melissa Nash, I am a resident of Kauai where my family homesteads in Moloa'a and teach island keiki and visiting families about beekeeping. We love the Aina and her creatures and are very concerned with the PMRF leasing the land	The Navy and NASA thank you for your comments and appreciate your participation. The Navy does not lease any land in the Project Area to companies for agriculture, nor does it have the	Land Use and Access, Biological Resources, Water

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				within their own lease to big ag companies who grow GMO crops and spray harmful pesticides in large experimental quantities. This poison goes into the land, the water and touches everything in its path. We would like to see the water on the west side restored to pre-plantation, natural routes, diversions removed and the land healed by Native Hawaiians. We would like to see this land used not for big ag to experiment, but to house local families who want to live close to the land and help heal it. We would like to see hemp grown, which can remediate the soil so it's safe for families to grow and live here. We don't need big ag to lease and poison the land. But we do need places for local Hawaiian families to cultivate so they don't have to leave the island in the ever growing housing crisis. Please stop working with the big ag corporations. Sincerely, Melissa Nash & family	authority to do so. The Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities are described in cumulative analysis (Chapter 4 of the Draft EIS) but are not conducted by the Navy or NASA. The Department of Land and Natural Resources (DLNR) leases these lands directly to Agribusiness Development Corporation (ADC) and Kekaha Agricultural Association (KAA), please see Chapter 4. The Draft EIS addresses the Navy's Readiness and Environmental Protection Integration (REPI) Programs, which include promoting regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds on the Mānā Plain, please see Section 1.3.6 (Environmental Management and Stewardship) and Section 4.1 (Introduction to Analysis). A current REPI project also includes the creation of an open floodable space to reduce the quantity and improve the quality of stormwater runoff discharged from agricultural	Resources, Socioeconomics

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					drainage ditches into the nearshore environment at PMRF. Additionally, a wetland delineation was conducted in support of this EIS and can be found in Appendix N. Outside of the REPI programs, the Navy does not have the authority to alter the current water system on the state-owned lands on the Mānā Plain. We value your concerns. To discuss your ideas about agricultural practices on the restrictive use easement lands, the EIS team suggests reaching out to ADC or KAA.	
37	Helen Cox	Kauai Climate Action Coalition	1	Thank you for the notice of the Pacific Range Missile Facility (PMRF) and the Kōkeʻe Park Geophysical Observatory (KPGO) Environmental Impact Statement (EIS) scoping process. Kaua'i Climate Action Coalition is an island wide organization with more than 165 members whose mission is to work collaboratively to educate, advocate and take direct action to address the climate crisis. We welcome the opportunity to provide input. We are sure you are aware that the US military is one of the world's largest greenhouse gas polluters, and we appreciate all efforts to mitigate this enormous problem. However, input to the scoping of the EIS is made difficult because the public has no information regarding the full scope of PMRF activities.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. The scope of analysis for this EIS is described in Section 1.5 (Scope of Environmental Analysis) and includes securing new leaseholds and easement lands and does not include additional activities or development. As described in the Draft EIS, PMRF testing and training activities conducted on fee simple lands have all been previously addressed in the 2018 Hawaii-Southern California Training and Testing (HSTT) EIS/Overseas EIS (OEIS) and the 1998 PMRF Enhanced Capability EIS. Both of these documents are publicly available and can be found on the	EIS Process, Existing Operations

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				Our comments below, therefore, are made from a limited understanding of PMRF's current activities and their impacts.	PMRF KPGO EIS website (www.pmrf-kpgo-eis.com).	
37	Helen Cox	Kauai Climate Action Coalition	2	1. Conduct an environmental assessment of its natural lands and those adjacent to it and compare the findings to the last EIS. Have the coastal lands, near shore environments, and wetlands been enhanced or degraded? Have endangered species increased or decreased from the last EIS? How will negative effects be mitigated? 2. Assess emissions from all sources at PMRF and report those transparently. 3. Analyze and mitigate the pollutants produced at PMRF. The missiles, the diesel trucks, the tow motors, the aircraft, the commuter cars, the laundry equipment, the electricity used, etc. etc. If there are secret military test projects that pollute, they should be looked at and mitigated confidentially. Please tell us if there is laser and electromagnetic research there, because of the massive expenditure of electricity that is used. Please include the submarine and drone boat emissions also. What will be done to mitigate these impacts?	1) Section 3.4 (Biological Resources) of the Draft EIS describes potential effects from the Proposed Action (including noise and light pollution) and is supported from baseline flora and fauna studies conducted in support of this EIS. Sections 2.5 (Best Management Practices) and 3.4 also identify protection and mitigation measures implemented at PMRF to protect biological resources. Section 3.7 (Water Resources) of the Draft EIS includes a description of the existing condition of wetlands in the project area and describes potential effects from the Proposed Action. A wetland delineation was performed within areas identified in the assessment with potential for wetlands; results suggest that the only potential wetlands within the region of influence (ROI) appear to be hydrologically connected to the ditches, with water likely flowing back and forth between the ditches and wetlands. The results have yet to be verified by the U.S. Army Corps of Engineers. The wetland delineation can be found in Appendix N.	EIS Process, Biological Resources, Air Quality and Greenhouse Gases, Transportation

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					Sections 2.5 and 3.7 also identify protection measures implemented to protect water resources, including wetlands. 2) Section 3.10 (Air Quality and Greenhouse Gases) of the Draft EIS describes potential effects from the Proposed Action to air quality (including emissions). As described in Sections 1.3 (Background) and 3.4 of the Draft EIS, a number of Readiness and Environmental Protection Integration (REPI) projects in the vicinity of the project area are focused on mitigating risk to these resources and the base's military mission. Additionally, each resource chapter in the EIS contains a table summarizing predictable environmental trends. 3) Since the scope of this EIS is limited to land-based leaseholds and easement lands, marine-related activities, such as from submarines and boats, are outside the scope of this EIS. As described in Section 1.3.3 (Navy Mission at PMRF), for information regarding at-sea military activities please refer to the 2018 Hawaii-Southern California Training and Testing (HSTT) EIS/Overseas EIS (OEIS). This document can be found on the EIS website at www.pmrf-kpgo-eis.com.	

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					As described in Section 3.9 (Public Health and Safety), electromagnetic radars, which provide support to missile tracking and surveillance activity, are located on Mākaha Ridge. Mitigation measures and procedures that are followed to minimize risk are discussed in Section 3.9. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-6 discusses public health and safety, and the improvements to closure protocol and public notification of the activation of restrictive easements during launch activities at PMRF Main Base. Chapter 5 of the Draft EIS describes actions the Navy and NASA is currently taking to avoid and minimize impacts from the Proposed Action and would continue to implement under the action alternatives. Finally, this chapter presents potential compensatory mitigation measures for consideration to offset remaining unavoidable adverse environmental effects from the Proposed Action and alternatives analyzed in this EIS.	

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37	Helen Cox	Kauai Climate Action Coalition	3	4. We are aware that PMRF biologists removed healthy Kiawe forests. Consider a native lowland forest restoration project that would both remediate the soil and capture at least some of the massive amount of CO2 emitted by PMRF? 5. The land around PMRF was formerly agricultural, much of it still in agriculture. What are the Navy's intentions and what are the impacts?	4) The Navy has recently conducted kiawe removal and a native species revegetation project below the North Launch Pad on fee simple land. As stated in Section 3.4 (Biological Resources) of the Draft EIS, kiawe is a non-native species located in the leaseholds and easement lands and in the vicinity of PMRF. As described in Section 3.4, PMRF Natural Resource Staff target noxious weeds provided by Kaua'i Invasive Species Council (KISC) identified for early detection and rapid response. Removal of invasive plants and native plant restoration at PMRF in the project area are discussed in Section 2.5 (Best Management Practices) and Section 3.4. 5.) The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how	Biological Resources, Air Quality and Greenhouse Gases

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					these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities, conducted by Kekaha Agricultural Association (KAA) and the Agricultural Development Corporation (ADC), are described in cumulative analysis (Chapter 4 of the Draft EIS). A history of land use in the project area is included in Section 1.3 and Section 3.5 (Land Use and Access).	
37	Helen Cox	Kauai Climate Action Coalition	4	6. Assess the impacts climate change will have on PMRF and how these will be mitigated. Impacts will include sea level rise, increased wildfires, water issues, and heat, among others.	6) Potential effects from the Proposed Action to natural resources are discussed in Sections 3.4 (Biological Resources) and 3.7 (Water Resources), and potential effects from the Proposed Action to air quality and greenhouse gas emissions are discussed in Section 3.10 (Air Quality and Greenhouse Gases). A map showing the 3.2-foot sea level rise scenario is included in Section 3.1.2 of the Draft EIS, and predictable environmental trends (including sea level rise) are discussed in each resource section. Also, please refer to Section 4.1.5 (Past, Present, and Reasonably Foreseeable Future Actions) in regard to renewable and clean energy projects ongoing and slated for future development. As described in Sections 1.3	Air Quality and Greenhouse Gases, Sea Level Rise

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					(Background) and 3.4 of the Draft EIS, a number of Readiness and Environmental Protection Integration (REPI) projects in the vicinity of the Project Area are focused on mitigating risk to these resources and the base's military mission.	
37	Helen Cox	Kauai Climate Action Coalition	5	7. Inspect and possibly remove or replace the fuel storage tanks at PMRF since they are the same generation as those at Red Hill. Findings should be shared with the public.	7) The Draft EIS includes a discussion on the use of best management practices (BMPs) that are in place to prevent unintentional release of fuels in Section 3.12 (Hazardous Materials and Waste). Tables within Section 3.12 summarize the storage tanks located within the Project Area and include storage tank size, use, and secondary containment measures. An overview of the Navy's procedures that would be followed in the event of an oil spill per the PMRF Oil and Hazardous Substance Spill Contingency Plan can be found in Section 3.9 (Public Health and Safety) of the Draft EIS. Additionally, the Plan outlines procedures to be followed in the event of a spill (provided in flow chart form), and is available on the PMRF KPGO EIS website, www.pmrf-kpgo-eis.com.	Hazardous Materials and Waste
37	Helen Cox	Kauai Climate Action Coalition	6	8. Explore how PMRF can partner with local organizations to increase the sustainability and resilience of the island. 9. Consider whether PMRF needs all the land it currently holds and reduce the land	8) As described in Section 1.7.5 (Ongoing Community Coordination) in the Draft EIS, PMRF partners with non-profit organizations and Native Hawaiian Organizations (NHOs) for	Land Use and Access, Biological Resources, Alternatives

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				holdings in the lease if possible. Submitted by Helen A Cox, Chair, Kaua'i Climate Action Coalition, kauaiclimate@gmail.com	events such as beach clean ups and Native Hawaiian cultural practices, respectively. Information about PMRF's coordination with NHOs is described in Section 3.3 (Cultural Practices) in the Draft EIS. Also, a description of the Navy's use of land at PMRF is included in Section 1.3 (Background) and a description of alternatives considered is included in Chapter 2 (Proposed Action and Alternatives) in the Draft EIS. Chapter 2 of the Draft EIS includes a description of Alternatives 1 and 2 as well as other alternatives that have been considered but dismissed. Alternatives contemplating smaller footprint and shorter duration real estate agreements were considered but eliminated from detailed analysis as described in Section 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis) of the Draft EIS. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) which	

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					seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders. EMM-5 also discusses the establishment of a Kaua'i Navy-Department of Land and Natural Resources (DLNR)-Department of Hawaiian Homelands (DHHL)-Agribusiness Development Corporation (ADC) working group to collaboratively manage water resources in West Kaua'i.	
38	Bonnie P Bator Ohana	n/a	1	To: Whom It May Concern : DLNR state of Hawaii AND U.S. Navy / PMRF AND National Aeronautics and Space Administration (NASA) NO ACTION - We adamantly agree: ~ NO ACTION ~ "NO" to ALL proposed real estate agreements with the state of Hawaii for the Pacific Missile Range Facility (PMRF) and the Koke`e Park Geophysical Observatory (KPGO) -NO continuance of long-term lease of the Department of Defense use of the 8,348-acres of Crown Lands - The Ceded Land Trust Koke`e, Kaua`i -NO to the SPECIFIED 410 acres, which the U.S. Navy PMRF -NO to NASA proposal of continuance of the leasing AND long-term use of the 23-acres of Crown Lands - The Ceded Land Trust Koke`e, Kaua`i - of named: NASA Koke`e Park Geophysical (KPGO)	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Your opposition to the project is noted. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands. All comments received during the scoping period are included in this appendix of the Draft EIS. Updates to the project can be found on the PMRF KPGO EIS	General Opposition

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				ABSOLUTELY `A`ole NO to the proposed action: in the PMRF-KPGO in the draft Environmental Impact Statement (dEIS) We look forward to acknowledgement of Our participation and implementation of NO ACTION ALTERNATIVE ... Please keep Us abreast of any/all updates in the dEIS scoping process via U.S.Postal Service (USPS) - regarding Our comments - of the draft Environmental Impact Statement scoping process ALOHA `ĀINA, MAHALO Loa Sincere ALOHA, Bonnie P Bator `Ohana (Keana`aina, Keli`ikoa, Kai`aokamalie & Kai)	website (www.pmrf-kpgo-eis.com). Your contact information has been added to the mailing list for the project.	
39	Louise Sausen	n/a	1	I oppose Navy acquisition of 8,000 acres of CROWN LANDS 🔥 😟 🔥 Especially when Kanaka are being PRICED OUT OF OUR ONE HANAU 🔥 😟 🔥 Keep Hawaiian lands for Hawaiian people 🏵 ✸ 💕 ✸ 🏵	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Your opposition to the project is noted. Alternative 1 of the Proposed Action is described in Chapters 1 and 2 of the Draft EIS and includes the Navy retaining use of 8,172 acres of state land, rather than acquisition. Alternative 2 in the Draft EIS, as a point of comparison, describes and compares potential impacts from the acquisition of 700 acres of state land (684 acres for Navy use and 16 acres for NASA use) to Alternative 1. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No	General Opposition to Navy, Land Use and Access

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					Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
40	Regina Gregory	n/a	1	Scopting Comments, PMRF 1. Linking to the NASA Observatory seems like another military land grab. Instead, you should include your environmental impacts on Niʻihau, Kwajalein, the 1,100-square-mile instrumented underwater range, and the broader ocean impact area. 2. Excluding people from the land is a major impact. A nearly 8,000-acre "buffer zone" is excessive and could be reduced. Your assessment should also include options to retain less land, e.g., omit Kamokalā Ridge, the Mānā Water Well, Miloliʻi Ridge, and/or Makaha Ridge. 3. The Hawai'i Supreme Court has already ruled that leasing public lands to the US military is not in keeping with DLNR's duty to safeguard that land. It also runs counter to the "reconciliation" called for in Public Law 150-103. The sale of public lands is strongly discouraged by law. In fact, the entire US military presence in Hawai'i rests on a shaky foundation of illegal occupation.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The EIS has been prepared consistent with the current federal and state legal framework. The scope of the analysis is described in Section 1.5 (Scope of Environmental Analysis) of the Draft EIS and encompasses land-based Navy and NASA leaseholds and easement lands with the Department of Land and Natural Resources (DLNR) on Kauaʻi, Hawaiʻi. Lands outside of the region of influence (ROI), including ocean resources, are outside the scope of this EIS. Other alternatives were considered but not carried forward into the EIS because they did not meet the purpose and need for the project (see Section 1.4 and Chapter 2). As described in Section 2.3	EIS Process, Area of Analysis, Alternatives, Land Use and Access

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					(Alternatives Carried Forward for Detailed Analysis) of the Draft EIS, under Alternatives 1 and 2, the Navy and NASA propose to maintain the size of current real estate agreements and do not propose any development.	
40	Regina Gregory	n/a	2	4. The "no action" alternative is clearly preferable environmentally. Under this option, the Navy should not be allowed to simply abandon it, but be required to clean it up. That will create a lot of jobs!	Analysis of potential impacts from the No Action Alternative is included in the Draft EIS consistent with regulatory requirements. As described in Section 2.3.3 (Alternative 3) in the Draft EIS, under the No Action Alternative the Department of Land and Natural Resources (DLNR), Navy, and NASA would collaborate if existing infrastructure on the state lands would be removed, and any remediation required before the state reacquired control of the property would be negotiated. Potential impacts from this alternative are described under each resource in Chapter 3 of the Draft EIS.	General Opposition to Navy, Alternatives, Socioeconomics
40	Regina Gregory	n/a	3	5. Leading STEM students into military careers should not be considered a benefit. It takes them away from more useful endeavors like renewable energy, water management, and other forms of progress toward sustainability instead of destruction. Economic impacts should include not only income from DoD, but also loss from	Potential effects to socioeconomics from the two action alternatives and the No Action Alternative are described in Section 3.6 of the Draft EIS. Economic impacts that analyze alternative uses of land is speculative and is beyond the scope of this EIS.	Socioeconomic Impacts, Land Use

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				alternative uses of the land. Regina Gregory		
41	Laney Gordon	EPA, Region 9	1	Dear Kerry Wells: The U.S. Environmental Protection Agency has reviewed the above-referenced document. We are providing comments pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. It requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement. The U.S. Navy and the National Aeronautics and Space Administration (NASA) intend to prepare a Draft Environmental Impact Statement (DEIS) to evaluate the potential environmental impacts of the proposed real estate agreements with the State of Hawai'i for the Pacific Missile Range Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO) project. The Department of Defense utilizes 8,348 acres of State lands on Kaua'i for operational continuity and sustainment of the PMRF, including military training, testing, and facility operations. The continued long-term NASA use of 23 acres of State lands is in support of continued KPGO operations, including	On behalf of the Navy and NASA, the EIS team thanks the Environmental Protection Agency (EPA) for their comments.	EIS Process

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				measurements of the Earth's rotation and local land motion.		
41	Laney Gordon	EPA, Region 9	2	Review Summary The Preparation Notice of the DEIS is primarily a disclosure document for a real estate action to be negotiated with the State of Hawai'i. As such, EPA did not identify significant public health, welfare, or environmental quality concerns to be addressed in the Draft EIS. For your consideration, we have recommendations regarding environmental justice and climate change, to enhance disclosure and further distinguish impacts in and around the project area. Please see the attached detailed comments. The EPA Appreciates the opportunity to review this NOI for the Draft EIS for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory. If you have any questions, please contact me at (213) 244-1834 or contact Laney Gordon, the lead reviewer for this project, at (415) 972-3562 or gordon.laney@epa.gov. EPA'S DETAILED COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PACIFIC MISSILE RANGE FACILITY AND KŌKE'E PARK GEOPHYSICAL OBSERVATORY REAL ESTATE AGREEMENT, KAUAI, HAWAII – June 17, 2024	The Navy and NASA appreciate the proposed recommendations. Potential effects from the Proposed Action to public health and safety are discussed in Section 3.9, and to land use and access in Section 3.5of the Draft EIS. Regarding concerns related to environmental justice, please see the introductory paragraph on page I-1 of this appendix.	EIS Process, Land Use
41	Laney Gordon	EPA, Region 9	3	Environmental Justice We appreciate the discussion in the Preparation Notice of the Draft EIS regarding the history of land tenure in	Executive Order 14148 "Initial Rescissions of Harmful Executive Orders and Actions" (90 FR 8237) revoked prior executive orders	Socioeconomics, Land Use

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				Hawai'i, documented in the Land Use section and Appendix A. There are continuing effects from this history that weigh on members of the Native Hawai'ian community, expressed through comments during scoping, that are not captured in the document. These remarks were reiterated during public meetings for the project on June 4, 2024; some of the public's concerns were also reported in the Kauai Now News on June 9, 2024. These comments reference Native Hawai'ians' cultural attachment to the land, and stress that their native lands were wrongly taken. The comments specifically cite the $1.00 fee paid by the Army in 1964 for the 65-year lease as an example of inequity. Recent Executive Orders direct the entire Federal Government to advance equity and racial justice for underserved communities, including Native Hawaiian/Pacific Islander communities. Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (January 20, 2021) directs federal agencies to evaluate whether their policies produce racially inequitable results when implemented, and to make the necessary changes to ensure underserved communities are properly supported. Executive Order 14031: Advancing Equity, Justice, and Opportunity for Asian Americans, Native	requiring the analysis of Environmental Justice concerns in NEPA. Therefore, an Environmental Justice discussion is not carried forward as a resource section in the DEIS. Information regarding the history of leases and easements can be found in Section 3.5 (Land Use and Access) of the Draft EIS. As described in Section 3.6 (Socioeconomics) of the Draft EIS, the fair market value will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. The overthrow of the Hawaiian Kingdom and the U.S. military's involvement is discussed in the Draft EIS analysis of impacts to Land Use in Sections 3.5.1.4 (History of Ceded Lands in the ROI) and 3.5.2 (Environmental Consequences).	

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				Hawaiians, and Pacific Islanders (May 28, 2021) seeks to eliminate barriers to equity and justice for these populations. We also note that the Department of Defense's Equity Action Plan, pursuant to EO 13985, includes a strategy "to advance equity and rectify past harms" resulting from environmental and other impacts from defense activities on ancestral lands. These directives should be considered in the context of the project, to help guide decisionmaking.		
41	Laney Gordon	EPA, Region 9	4	Additionally, the guidance document Promising Practices for EJ Methodologies in NEPA Reviews may be helpful to consult when determining how non-chemical stressors (e.g., chronic stress related to environmental or socio-economic impacts) amplify impacts. As stated in that document, "The cumulative ecological, aesthetic, historic (emphasis added), cultural, economic, social, or health effects of a proposed action can arise from and also include non-chemical stressors" (p. 32). Recommendations: In the Draft EIS, consider how the permanent loss of State land through fee simple retention differs from retention through non-permanent mechanisms such as leases, etc., and discuss impacts related to these land retention mechanisms. Consider how these mechanisms could be received by the public, including communities with environmental justice concerns, in the	Regarding Promising Practices for Environmental Justice Methodologies in NEPA Reviews, please see response to comment #2. Section 3.6 of the Draft EIS discusses the potential socioeconomic impacts to communities from the Proposed Action. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1. EMM-4, the development and continuation of the One Kauaʻi Hui (Stakeholder Engagement Group) which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community and other interested stakeholders, is	Socioeconomics

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				unique historic context of the affected environment. We recommend that conclusions regarding environmental justice impacts attempt to reflect the mental and emotional health impacts and the larger cumulative sense of loss and injustice, and not only the impacts to specific resources (e.g., transportation, recreation/hunting, or to cultural resource access). After reviewing and identifying these additional military land use impacts on environmental justice, please identify corresponding mitigation measures in the Draft EIS. Examples could be establishing regular communication channels to strengthen relationships with the Native Hawaiian community, and in consultation, exploring other State-owned military lands that may be underutilized and could be repurposed for community use.	discussed in Table 5.2-1 of the Draft EIS.	
41	Laney Gordon	EPA, Region 9	5	Climate change effects/incorporating resilience The newly added PMRF site is very close to the shoreline. Should this site be selected, the facilities will experience various climate change effects that can bear on both the project and on environmental resources. According to the State of Hawai'i Sea Level Rise Viewer, the shoreline of Kauai at the project site will experience sea level rise and coastal erosion that approaches the development site. The FEMA flood hazard zone already begins to encompass the site, and	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes	Sea Level Rise, Air Quality and Greenhouse Gases, Water Resources

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				additional hazards associated with storm waves are indicated. Modeling results for the 1%-annual-chance coastal flood zone with 3.2 feet of sea level rise, which estimates coastal flood extents for wave-generating events including tropical storms, hurricanes, tsunamis and other severe wave events, show the entire PMRF within the coastal flood zone. This indicates increased vulnerability to coastal event-based flooding by the year 2100. Please refer to the West Kaua'i Community Vulnerability Assessment for more information. We understand it is Department of Defense (DoD) policy to identify and assess climate change effects on the department's mission, and to consider them when developing plans. According to a DoD reporta decision that involves enduring or permanent infrastructure meant to perform at least 50 years into the future, is mission critical with limited alternative options, and represents an irreversible commitment of resources, would dictate a consideration of higher-end sea level rise scenarios.	an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. Easement 2 is the only easement located along the shoreline at Polihale State Park, and as described in Appendix D this is a restrictive use ground hazard area easement. As described in Section 1.5 (Scope of Environmental Analysis) of the Draft EIS, the Navy does not conduct activities on these easement lands. A map showing the 3.2-foot sea level rise scenario is included in Section 3.1.2 of the Draft EIS, and predictable environmental trends (including sea level rise) are discussed in each resource section. Potential effects from the Proposed Action to natural resources are discussed in Sections 3.4 (Biological Resources) and 3.7 (Water Resources), and potential effects from the Proposed Action to air quality and greenhouse gas emissions are discussed in Section 3.10 (Air Quality and Greenhouse Gases). Also, please refer to Section 4.1.5 (Past, Present, and Reasonably Foreseeable Future Actions) in regard to renewable and clean energy projects ongoing and slated for future development. As	

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					described in Sections 1.3 (Navy and NASA Use of State Lands) and 3.4 (Biological Resources) of the Draft EIS, a number of Readiness and Environmental Protection Integration (REPI) projects in the vicinity of the Project Area are focused on mitigating risk to these resources and the base's military mission. Additionally, each resource chapter in the EIS contains a table summarizing predictable environmental trends.	
41	Laney Gordon	EPA, Region 9	6	Recommendations: EPA strongly recommends that the design of the PMRF alternative include components to protect the asset from climate change effects. Prioritize preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, floodplains, and wetlands, that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change. Discuss applicable nature-based project elements that can be integrated into the project design, exemplified by the U.S. Army Corps of Engineers "Engineering with Nature" program. Discuss both gray and green infrastructure, and combinations of both. Discuss whether increasing dune restoration would protect both the project and important cultural sites. Discuss how current groundwater pumping at PMRF will affect the project, and if updating	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The impact analysis in Chapter 3 for each resource describes effects from ongoing activities and potential effects from the Proposed Action. Also, please refer to Section 4.1.5 (Past, Present, and Reasonably Foreseeable Future Actions) in regard to renewable and clean energy projects ongoing and slated for future development, including the Mānā Plain Open Floodable	Proposed Action, Water Resources

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				pumping practices would increase resilience.	Space Project and nature-based solutions. Removal of invasive plants and native plant restoration at PMRF and the project area are discussed in Sections 2.5 (Best Management Practices) and Section 3.4 (Biological Resources) of the Draft EIS. Potential effects to water are discussed in Section 3.7 (Water Resources) of the Draft EIS.	
41	Laney Gordon	EPA, Region 9	7	It is also important to acknowledge, as noted in the West Kauai vulnerability assessment, that sea level rise threatens the West Kauai transportation system, including the Kaumualiʻi Highway, which is vulnerable to sea level rise (i.e., erosion, passive flooding, wave inundation), heavy rainfall, and storm events. According to the specific Navy environmental stewardship activities (pg. 1-13) and the Best Management Practices (BMP) in Table 2-6 of the Preparation Notice, there are plans to establish a "monitoring program for the nearshore environment of the PMRF to inform future management decisions and monitor changes over time." The Draft EIS should assess the environmental impacts to relevant resources that would occur as a result of project elements necessary for climate change adaptation. It is important that these project elements be explored now and not be deferred, as time may be needed to develop nature-based project	See response to comment #6 regarding upcoming cumulative projects. The Proposed Action does not include any change in activities or construction. A map showing the 3.2-foot sea level rise scenario is included in Section 3.1.2 of the Draft EIS, and predictable environmental trends (including sea level rise) are discussed in each resource section. Each resource chapter in the EIS contains a table summarizing predictable environmental trends. The Navy and NASA are also presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS.	Proposed Action, Biological Resources, Sea Level Rise

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				features. Hardening features such as sea walls and revetments should be included only after nature-based solutions have been fully explored.		
41	Laney Gordon	EPA, Region 9	8	We believe full use of the NEPA process will be especially informative for this project and if undertaken well, can prove particularly valuable for decision-makers. Please let us know if the EPA can assist in this endeavor through early involvement during the NEPA process.	Mahalo for your engagement and participation in the scoping process. We appreciate the comments you provided. Please refer to the letter sent to you on September 9, 2024 that directs you to our team contact information should you have any further questions or require further information regarding the EIS.	EIS Process
42	Ray Catania Puhi	n/a	1	Aloha, Went to the June 6 presentation at Sheraton Coconut Beach. Our Hawaii ocean environment and Kanaka cultural resources and it's protection are being used to build U.S. military superiority in the Pacific and Asia- "from the ocean bottom up to the atmosphere." But also, Israel/IDF inclusion is part and parcel of U.S. dominance in the Middle East and the continued subjugation of the Palestinian people. Good and sincere people who believe in ocean/environmental and Kanaka cultural issues have been recruited for this purpose. Diplomacy and non-violence is the answer. What happened to civilians in Nagasaki and Hiroshima are historical lessons we should take to heart. This is "green imperialism." Mahalo, Ray Catania Puhi	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Your opposition to the project and military is noted. The Proposed Action is described in Chapters 1 and 2 of the Draft EIS, and includes securing new real estate agreements and does not include additional development or additional testing and training activities. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). Potential impacts to cultural resources and biological resources from the Proposed Action can be	Water Resources, Cultural Practices, General Opposition to Navy

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					found in Sections 3.2 (Archaeological and Architectural Resources), 3.3 (Cultural Practices), and 3.4 (Biological Resources) of the Draft EIS.	
43	Ruta Jordans	Zero Waste Kauai	1	PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells, Thank you for the opportunity to make suggestions that should be considered by PMRF in its Real Estate Environmental Impact Statement. Zero Waste Kauai was founded in 2006. Our mission is to educate, inspire and assist the government, businesses, residents and visitors of Kauai in transitioning to a zero waste society and to advocate policies and implement programs that move Kauai toward a zero waste society. Zero Waste Kauai is most concerned about environmental impacts of waste generation and disposal. We appreciate the large solar array at PMRF which has decreased the use of fossil fuels to produce energy. However, we would ask you to include in the EIS what PMRF is doing to reduce the amount of waste generated, specifically on how waste such as recyclables, organics, and construction and demolition wastes are reduced and/or diverted from the landfill and how PMRF is promoting a circular economy.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Waste minimization, recycling and green waste composting are incorporated by the Navy and NASA when possible in order to minimize the quantities of solid waste generated at PMRF. Disposal procedures, solid waste, and waste management are discussed in Section 3.12 (Hazardous Materials and Waste) of the Draft EIS. Additionally, the Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS.	Hazardous Materials and Waste
43	Ruta Jordans	Zero Waste Kauai	2	Please consider the following issues in the EIS: The Kekaha Landfill is due to be full in the next two to six years. Making less	Disposal procedures and waste management are discussed in Section 3.12 (Hazardous Materials	Hazardous Materials and Waste

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				trash or diverting usable materials would extend the life of the landfill. Zero Waste Kauai has consulted with PMRF in the past on diversion opportunities, specifically for organics, but, to our knowledge, no action has been taken. Diversion of organics (food waste and green waste) from the landfill to composting eliminates the production of methane in the landfill and produces a soil amendment which holds water and makes more nutritious soil. PMRF has a large population of residential and commuting personnel, which produces much usable food waste. According to https://www.defense.gov/News/News Stories/Article/Article/612710/ Pentagon officials said that climate change is a security risk because it degrades living conditions, human security and the ability of governments to meet the basic needs of their populations. It is obvious that the risk is even bigger for islands in the middle of the Pacific Ocean. Recycling helps combat the climate crisis by limiting the use of raw materials and reducing waste going into landfills. https://www.colorado.edu/ecenter/2023/12/15/impact-recycling-climatechange" How will the EIS address these issues? Ruta Jordans, Zero Waste Kauai President, zwknow@gmail.com	and Waste) of the Draft EIS. Section 3.12 also describes the Site Sustainability Plan that applies to waste at Main Base leaseholds and easements.	
44	Maria Walker	n/a	1	Aloha, I am strongly in favor of Option 3 in the plan for the future of the properties currently being used by the Navy and	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your	General Opposition, Socioeconomics,

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				NASA. The history of military presence in Hawaii has clearly shown that the US government has no respect for the land, water, or people of Hawaii; that they are willing to exploit natural resources with impunity and leave behind toxic waste that they refuse to clean up; that they desecrate historical and cultural sites with no consideration for this place, and that they occupy these lands while paying no reasonable taxes or rent for them. The coast at Mana should be open and free for residents and visitors to use, and the rest of the west side land needs to be saved for agriculture. I strongly support the Navy and NASA vacating the lands they are using, cleaning them up thoroughly, and returning the properties to their natural condition before they were developed. i do not believe there are any positives for our residents, visitors, or island land and waters in continuing to have this military presence on Kaua'i. Thank you for reading my comment.	participation. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). The EIS has been prepared consistent with the U.S. and State of Hawai'i's environmental regulatory framework.-Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	Biological Resources, Land Use and Access
45	James Trujillo	n/a	1	Aloha, I recommend the 3rd option- allow the lease to expire and return the land to the state and the people of Hawai'i The demilitarization of Hawai'i, while supported by some but opposed by most, is a modern day reality in our post colonial world. As America struggles with it's white supremist past, the peoples of the Pacific will continue to seek balance and harmony with the natural world. This will be made possible by taking the first steps	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) in the Draft EIS. The EIS has been prepared consistent with the U.S.	General Opposition to Navy, Land Use and Access, Cultural Practices

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				in decommissioning the PMRF along with other military installations and facilities in the state. Reconsolidation of military operations in the state and limited to O'ahu is the next step in de-occupying Hawai'i. Mahalo for considering this testimony on the draft EIS for PMRF & KPGO. Again, I favor the 'No Action' option and encourage you to look favorably on Option 3 With respect and aloha, James Gerard Trujillo Makaleha, Kapahi, Kaua'i	and State of Hawai'i's environmental regulatory framework. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
46	Kevin Houck	n/a	1	Hi, Please reopen and remove restrictions to coastal access of the entire mana shoreline for coastal access for surfing, Kayaking, canoeing, fishing, walking, horseback riding and cultural practices. The pmrf guest card program is a great program that provides some access to some of the shoreline but it does but provide access to all of the areas that are recognized as public shoreline by the State of Hawai'i set forth in Hawai'i Revised Statutes Chapter 205 a Coastal Zone Management (attached) regarding the public access right to coastal areas. There are still several miles of ka moaena hohola o mana that are not accessible. Thanks for your time and stewardship of this area, and have a nice day. Aloha, Kevin	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare, and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural	Land Use and Access, Cultural Practices, General support

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					Practices) and 3.5 (Land Use and Access) of the Draft EIS, the Proposed Action does not change public access at PMRF. Section 1.7.4 (Intergovernmental Coordination) of the Draft EIS describes how the Navy is coordinating with State of Hawai'i Office of Planning and Sustainable Development, Planning Division under the Coastal Zone Management Act.	
47	Steve Parsons	Kauai Climate Action Coalition, Kauai EV, Surfrider, Kauai Board of Realtors	1	Aloha EIS Team, While I understand this is just the beginning of the EIS process, I also get, at a high level, that we as a species have a very short window of time to decarbonize our world before unmanageable tipping points are crossed leading to UNIMAGINABLE Climate Chaos! Kauai is one of the Crown Jewels of our planet regarding natural beauty, ecosystems that provide life to us, and it is under massive assault! Conversely, It is also an example of what can be done to fight climate change Faster than anyone thinks possible. Our power coop KIUC, went from about zero renewable energy about 20 yrs ago to about 60% today with plans to 100% RE within 10 yrs. Great, now we just need to electrify everything ASAP to eliminate all fossil fuel burning on Kauai. In fact, Kauai Climate Action Coalition along with the Surfrider Foundation Kauai Chapter, and Zero Waste Kauai are launching an	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. The team also thanks you for providing the uniform resource locator (URL) to the article regarding Kūpono Solar at Joint Base Pearl Harbor-Hickam. The Proposed Action and scope of analysis for this EIS is described in Chapters 1 and 2 of the Draft EIS. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development.	Transportation

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				#ElectrifyKauai campaign in July that we'd like PMRF to possibly collaborate on, but at a minimum we are asking PMRF to join and promote this campaign. Imagine, PMRF and KPGO to be the first in the nation to go all electric faster than anyone thought possible. We ask that you go really big in your thinking and brainstorm how you can unleash millions of Green Infrastructure dollars to accelerate the electrification of Kauai. Like the solar battery array you did with KIUC and AES, but BIGGER!!!! Perhaps like what joint base Hickam just launched last week. .https://cleantechnica.com/2024/06/14/powering-10000-homes-ameresco-celebrates-the-commercial-operations-of-kupono-solar-at-joint-base-pearl-harbor-hickam/	A detailed discussion about policies, Best Management Practices (BMPs), and other methods employed within the Project Area to protect natural and cultural resources can be found in Section 2.5 (Best Management Practices) in the Draft EIS. As described in Sections 1.3 (Background) and 3.4 (Biological Resources) of the Draft EIS, a number of Readiness and Environmental Protection Integration (REPI) projects in the vicinity of the project area are focused on mitigating risk to these resources and the base's military mission. PMRF has invested in renewable energy. The PMRF Solar Photovoltaic (PV) Park encompasses 140 acres and generates 70 megawatt-hour (MWh) electricity and supplies enough clean energy to power 6,000 households. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMMs pertaining to Socioeconomics (EMM-4, development and continuation of the One Kauaʻi Hui) and the	

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					management of Water Resources (EMM-5, establishment of a Kaua'i County Water Working Group) are outlined and discussed in the Draft EIS.	
47	Steve Parsons	Kauai Climate Action Coalition, Kauai EV, Surfrider, Kauai Board of Realtors	2	In the meantime, use Hawaii grown Biodiesel from Pacific Biodiesel for everything that is diesel to see an immediate 85% reduction in air pollution! As a former Gulf war vet that has 50% service related disability for serving in a war for Oil, would encourage the Department of Defence to look at fast electrification as a national defence strategy, a financial cost saver and climate mitigation plan including harding infrastructure all in one! Lastly, be wary of the s-curve like acceleration of ever worsening effects of climate change. For example, we have had approximately 1ft of SLR (Sea Level rise) in the last 80 yr. the next ft. is projected to come in the next 30 yrs., the next in 20...etc. However, there are wildcard variables our there like Thwiaites Glacier https://www.sciencefocus.com/planet-earth/doomsday-glacier-prevent-flooding will raise seas 2ft alone and then will allow another 10 ft of rise to release from all the ice it's damming. This could happen in decades, not centuries. So the sense of urgency that needs to be deployed ASAP cannot be understated.	A table summarizing predictable environmental trends is introduced in Section 3.1.2 of the Draft EIS. Each resource section in the Draft EIS includes a discussion of predictable environmental trends including sea level rise, rising temperatures, change in precipitation, increased frequency/intensity of extreme weather events and ocean acidification.	Sea Level Rise, Transportation
47	Steve Parsons	Kauai Climate Action	3	Here is what we are doing and we implore you to Join Us in the Electrify Kauai	Thank you for your comment.	Proposed Action

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		Coalition, Kauai EV, Surfrider, Kauai Board of Realtors		Campaign, by doing so you will aggressively attack your greenhouse gas emissions. Below is a draft of our #EK campaign. Please pardon any typos/grammatical errors as this draft is being launched on our website with QR code sign ups in early July. https://www.kauaiclimateactioncoalition.com/ #ElectrifyKauai A Big Mahalo for stopping by and learning how you can help fight against climate change and save money and the Aina by joining the #ElectrifyKauai Campaign! The scientists at UH (University of Hawaii), like Chip Fletcher, tell us we need to stop burning all Fossil Fuels ASAP and electrify Everything everything Why Electrifying Everything Is Not Just For Elites - CleanTechnica to avoid the worst effects of the Climate Crisis that is harming Kauai in so many ways: Increased drought, Wildfire risk like Maui, Massive Rain events causing historic flooding way more often like Kauai's 2018 floods, Losing our Native Birds due to a warming climate that allows mosquitoes to reach higher elevations, Sea Level Rise taking our beaches, our precious Coral Reefs are undergoing local and global mass bleaching events from record ocean heat and ocean acidification, and many more! Now the good news… By clicking the "Join Us" button your are taking ACTION and deciding to choose Clean-locally produced Electricity over dirty imported Fossil Fuels		

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				for your Transportation, in your Homes and businesses by Switching to Heat Pumps For Hot Water and Clothes drying, and by using electrical yard equipment, and battery backup Power banks instead of air polluting gas generators. The #EK campaign is an honor system and you choose when and how you switch. This is simply a resource to help you get there, faster than you think possible. Furthermore, we are not into climate-shaming around here. What we are into is Cleaner Air, Cleaner Oceans and by taking the following actions for your home and business, YOU are making a big difference! And a little more good news, most of the suggestions below have a significant money saving benefit including tax rebates. A complete resource on how to Go Electric and pay for it can be found at Rewiring America Now Join Us by going Electric in the following areas. #1 Go Electric with your transportation choices EVs (Electric Vehicles) Like Electric Cars Trucks to E-Bikes and E-Scooters. Many rebates available making Some nice EV's are now 10k less of the avg. car price (https://cleantechnica.com/2024/04/12/tesla-model-y-model-3-cost-10000-less-than-average-new-car-price/) and cost way less in charging costs and maintenance. https://advocacy.consumerreports.org/wp-content/uploads/2020/10/EV-TCO-Overall-Fact-Sheet-FINAL-3.pdf or do your		

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				own ICEV (Internal combustion engine Vehicle) Vs EV comparison to see how much you can save per yr here: https://chooseev.com/savings-calculator/ #2 For Hot Water Heating Choose Heat HPHWH (Heat Pump Hot Water Heaters) Electrify government buildings, homes and businesses by promoting Heat Pumps!!! Here's a funny locally made video to show how heat pumps work: Hawaii Energy - "Heat Pump" (2022) (caveat on the Video $500 rebate comes from KIUC for us) Usually, they are less than half the cost of solar hot water heaters. Fun efficiency Fact, If you switch out a reg.electric HWH with a HPHWH, you will save enough Electricity to power you car: https://cleantechnica.com/2023/10/06/a-heat-pump-water-heater-will-save-all-the-electricity-youll-need-to-power-your-electric-vehicle/ Think about how much time and money you could save by Going Electirc and keeping all that money on Kauai instead of sending it off island. If you rent, share this info with your landlord and direct them to this site. #3 If you can't hang your clothes to dry, Choose a Heat Pump Clothes Dryers! (Some examples https://www.homedepot.com/b/Appliances-Washers-Dryers-Dryers-Electric-Dryers/Heat-Pump/120-volt/240-volt/N-5yc1vZc3q1Z1z17j86Z1z17ja4Z1z1dtqi?NCNI-5&sortby=price&sortorder=asc&onDisplay		

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				=false # For Cooking...Go INDUCTION, Baby! Induction appliances are up to three times more efficient than gas stoves, and up to 10% more efficient than conventional smooth top electric ranges. This improved efficiency performance can result in lower energy costs as well as lower rates of air pollution associated with energy generation Induction stoves are also free of the indoor air pollutants that come from gas stoves: burning gas for cooking produces nitrous oxides (NOX), carbon monoxide (CO), and formaldehyde (HCHO), which can have negative health effects and exacerbate respiratory conditions. According to a 2022 study, 12.7% of current childhood asthma in the United States is attributable to gas stove use. .May 11, 2023 https://www.energy.gov/articles/making-switch-induction-stoves-or-cooktops #4 Electrify Tools and Yard equipment and get rid of the smelly gASS Powered ones. Americans use ~800 million gallons of gas per year mowing their lawns, producing tons of air pollutants. Lawn equipment emissions went largely unregulated until the late 1990's. As a result, they emit high levels of carbon monoxide, volatile organic compounds and nitrogen oxides, and produce up to 5% of the nation's air pollution More info and examples of how other areas of the country are making the switch fast can be found here: https://bedford2030.org/the-health-		

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				benefits-of-switching-to-electric-lawn-equipment/ #5 Electrify Food Trucks and street vendors and businesses/home power back up with Battery Backup systems that continue to fall in price and can be charged with solar. https://electrek.co/2023/10/23/food-trucks-are-switching-out-dirty-gas-generators-with-this-zero-emissions-option/ This is the right course of action for Cleaner Kauai and serves as a shining example to the world of what can be done and we believe Faster than anyone thinks possible and residents and visitors immediately start enjoying the benefit of Cleaner Air and Oceans! Everyone wants Clean Air! Check out the TOP TEN Benefits of Joining Electrify Kauai Campaign (*In no particular order) #1 Save Money Personally (Electricity is Cheaper than gas from EVs to Heat Pumps there are so many ways to Save! # Kauai County, Businesses and nonprofits Save money #3 Cleaner Air! Fossil Fuel Kills millions of people a yr: https://www.theguardian.com/environment/2023/nov/29/air-pollution-from-fossil-fuels-kills-5-million-people-a-year by By choosing electricity you are choosing cleaner air. #4 Cleaner Oceans! Surfers and Water people love their EVs, because they love the Ocean and fossil fuel pollution causes Ocean acidification that is killing our corals and other marine sea life along with ocean heatwaves: What is		

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				Ocean Acidification? #5 Feel good about doing your part for the next generations by acting now to mitigate the worst effects for them. https://climatecommunication.yale.edu/publications/distress-about-climate-change-and-climate-action/ #6 GOOD, Local Green Jobs are created when we go Electric.		
47	Steve Parsons	Kauai Climate Action Coalition, Kauai EV, Surfrider, Kauai Board of Realtors	4	In Fact, training for this is being expanded at Kauai Community College so residents can train for a great profession! Electrical Installation and Maintenance Technology | Kauai Community College #7 EVs can also support grid and via bidirectional charging as well as be a backup power source for 1st Responders, Businesses and homes: https://cleantechnica.com/2023/10/13/electric-vehicles-play-a-surprising-role-in-supporting-grid-resiliency/ EV Charging And The Grid — The Truth Is Out There - CleanTechnica #8 This will eventually help to fight inflation by lowering demand for oil and gas and thereby prices! Ironically, this also helps folks that cannot yet afford or acquire an EV, by lowering gas prices. #9 Help Kauai continue to be a shining example to the world of how to be environmentally Pono! In a not too distant past.. Kauai's power generation was about 99% from burning fossil fuels to over 57% year round renewable energy today, and targeting 100% by 2033. This was accomplished faster than anyone thought	Thank you for your comment and the information you provided about solar panels.	Proposed Action

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				possible and we will electrify Kauai faster than anyone thought possible, All this can happen, but only with your help, so Join us now! “Pledge Button Here”! End of Example... Please Act boldly to fight climate change!!! Mahalo, Steve Parsons, Lead for Kauai Climate Action Coalition and Kauai EV, Surfrider Foundation outreach team, Kauai Board of Realtors Green Real Estate & Sustainability committee Chair, Hanapepe Kauai 808-6513232c REALTOR® Broker, RB-22077 kwBig Island | RB-23793		
48	R. Chong	n/a	1	Support: Alternative 1 - Extend Leases. Alternative 2 - Fee Simple Acquisitions. Disagree with Leaving Hawaii.	On behalf of the Navy and NASA, the EIS team thanks you for your comment. The alternatives are described in additional detail in Chapter 2 of the Draft EIS.	General Support
49	Keala Heanani Carter	n/a	1	None of the three alternatives reflect the change of attitudes towards the environment, frontline communities and limited land and water resources reflected in Hawaii today versus Hawaii in 1965. Using Alternative 2 as a more extreme option to make the continuance of another long lease occupying massive acreage, reflected in Alternative 1 seem reasonable is not a sincere effort to provide real alternatives. Instead, it creates a sham choice between alternatives like 1 and 3 that are obviously very improbable politically. Instead of using the Alternatives 1 and 3 to push people in the direction of Alternative 2, offering some real “alternatives” to the	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). As described in Chapter 2, the alternatives analyzed in the Draft EIS were developed to meet the screening criteria and purpose of and need for the Proposed Action. Alternative 1 describes securing new real estate agreements to continue the same activities in the same areas	General Opposition, Alternatives, Land Use and Access, Socioeconomics

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				status quo and incorporating the environmental justice guidance of the Biden Administration could offer the community the chance to participate in the future of PMRF and the Kokee Observatory in a transformative way and also restore some of the trust lost from the Red Hill crisis. The community of the West Side of Kauai, particularly Kekaha, is distinct and has different values and needs that many of the other communities on the island. It is already an area disproportionately saddled with industry with less access to a variety of employment. In today's climate, an alternative that considers benefit to the immediate communities living near the base, and consulting with them to articulate community benefits, which could include job training or apprenticeships, access to the cultural sites on the base and more investment in the frontline community and environmental remediation and enhancement, would signal that the Navy and NASA realize things are different now and want to consider ways to balance occupying such a huge section of land and limiting public access, with equity as a counterbalance. The renaming of the beach was a nice gesture but didn't signify the type of substantive change needed in this lease renewal. It is important to consult closely with local organizations and Native Hawaiian Organizations to	that the Navy and NASA are currently using. Analysis of the No Action Alternative (Alternative 3) is included in the Draft EIS consistent with state and federal legal and regulatory requirements. Potential effects to socioeconomics are included in Sections 3.6 of the Draft EIS. Executive Order 14148 "Initial Rescissions of Harmful Executive Orders and Actions" (90 FR 8237) revoked prior executive orders requiring the analysis of Environmental Justice concerns under NEPA. Therefore, an Environmental Justice discussion is not carried forward as a resource section in the DEIS. Potential effects to access from the Proposed Action are discussed in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access) of the Draft EIS. Ongoing coordination with cultural practitioners, lineal descendants, and Native Hawaiian Organizations (NHOs) is described in Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS. Chapter 5 (Mitigation and Enhanced Management Measures) describes actions the Navy and NASA is currently taking to avoid and minimize impacts from the Proposed Action and would continue to	

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				understand what the communities of West Kauai consider important instead of just pushing for another extremely long lease that pretends things are equal to what they were in the 1960s. The vast majority of people with the higher GS jobs are not from West Kauai and creating additional pathways into employment for folks nearest would both cut down on the gas of the many contractors driving in from Kapaa and elsewhere and allow one of the lowest per capita income neighborhoods in the State an opportunity to train for skilled, tech jobs. The current administration has published several Executive Orders on Environmental Justice initiatives and it would be refreshing to see the Navy and NASA demonstrate they are embodying these priorities and looking to avoid the mistakes very fresh on locals' minds.	implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina. Specifically, EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders.	
50	Ruta Jordans	Kauai EV	1	Thank you for this opportunity to discuss environmental issues on PMRF. Please apply whatever is appropriate for Kokee also, such as electric transportation. We are concerned about the large number of commuters driving back and forth, many even coming from the north and east of Kauai, with most driving ICE (internal combustion) vehicles. I happened to be in the Waimea Visitors Center one afternoon when PMRF let out, about 4pm. There seemed to be a never- ending stream of cars. I have also been on base and discovered the long distances from one	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Navy and NASA work to support actions to reduce greenhouse gas emissions and protect natural resources. Section 3.10 (Air Quality and Greenhouse Gases) of the Draft EIS includes a discussion of potential effects to air quality and greenhouse gas emissions. Additionally, each resource chapter in the EIS contains	Air Quality and Greenhouse Gases, Transportation

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				part of the base to the other. Therefore we would like you to consider ways to lower the green house gas emissions from all those vehicles. Is there a charging infrastructure on base to encourage commuters to get electric vehicles (EVs)? Perhaps investigate an electric bus system to transport to and from PMRF to the east or north side - depending on how many people commute from there. Do you have those figures? PMRF could also have an inter-base electric bus system to reduce green house gas ICE driving within PMRF as well as up to Kokee.	a table summarizing predictable environmental trends. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The area of analysis includes the leaseholds and easement lands as described in Section 1.5 (Scope of Environmental Analysis) of the Draft EIS. Electric bus systems and other similar and/or related projects are outside the scope of this EIS.	
51	Claire Tonry	n/a	1	Dear Ms. Kerry Wells, I comment to express some of my concerns with the PMRF and KPGO (hereafter collectively referred to as "PMRF") NEPA scoping process. The two action alternatives currently proposed for consideration in the EIS are too similar, especially as to their impacts on the human environment. Additional, more distinctive action alternatives need to be considered in detail in the draft EIS	On behalf of the Navy and NASA, the ESI team thanks you for your comments and appreciates your participation. In Chapter 3 of the Draft EIS, the Navy and NASA analyze how the permanent loss of state land through fee simple retention differs from retention through non-permanent mechanisms such as leases, etc., and identify effects to these land retention mechanisms in the Draft EIS. Consideration of how these mechanisms could be received by the public, in the unique historic	Alternatives

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					context of the affected environment, are analyzed in Section 3.5 (Land Use and Access) of the Draft EIS. Chapter 2 of the EIS discusses the selection process for the alternatives, including the alternatives considered but not carried forward for detailed analysis. during this alternatives screening process, options of a shorter duration lease and not renewing current easements were analyzed. However, these alternatives did not support the requirements of Purpose of and Need for the Proposed Action and were dismissed. Table 2-2 in the Draft EIS describes the screening factors used to select the action alternatives.	
51	Claire Tonry	n/a	2	Such additional alternatives should include meaningful conservation measures for Mānā, Kōke'e and other affected areas, such as adding a conservation easement component to the expiring easements in renegotiations. The industrial pesticide and bioengineering research and development by multinational chemical manufacturers that is currently occuring under the exisiting easements is the source of significant toxic pollution which threatens local communities and state and federally protected rare and endemic species. The Navy should evaluate alternatives that ensure that agricultural use of the areas	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Chapter 2 of the Draft EIS includes a description of Alternatives 1 and 2 as well as other alternatives that have been considered but dismissed. The process for identifying alternatives is	Alternatives, Land Use and Access, Biological Resources, Hazardous Materials and Waste, Air Quality and Greenhouse Gases

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				under Navy easements is no longer counterproductive to the federal agencies' responsibilities under the Endangered Species Act and their own regulations to, inter alia, protect and recover listed species. Further expanding the Kawai'ele Bird Sanctuary (or similar reserve complex) should be examined across the action area for the same reason. The alternatives analysis should also include different approaches to reduce and eliminate the need for the Navy's overreliance on dirty diesel generators.	described in Section 2.2 of the Draft EIS. The Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities conducted by Kekaha Agricultural Association (KAA) and Agribusiness Development Corporation (ADC) are described in cumulative analysis (Chapter 4 of the Draft EIS). A history of land use in the Project Area is included in Section 1.3 (Background) and Section 3.5 (Land Use and Access) of the Draft EIS. Potential effects to public health and safety from the Proposed Action are described in Section 3.9 and potential effects from hazardous materials and waste are described in Section 3.12 of the Draft EIS. Sections 1.3.6 (Environmental Management and Stewardship) and 4.1 (Introduction to Analysis) the Draft EIS also address the present and future Readiness and Environmental Protection Integration (REPI) Programs including promoting regeneration of	

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					historic wetland habitat for endemic and endangered Hawaiian waterbirds on the Mānā Plain. As described in Section 3.7 (Water Resources) of the Draft EIS, water monitoring on PMRF land (Mānā Plain) occurs quarterly (at a minimum), and all results are publicized via the ADC website, dating back to 2020 (https://dbedt.hawaii.gov/adc/manaplain/). Potential wetland areas containing native and non-native vegetation and federally protected waterbirds are present on PMRF lands.	
51	Claire Tonry	n/a	3	A revised scoping notice and the draft EIS should also examine how a broader range of alternatives would each interact with planned, foreseeable, proposed, and needed development and restoration on Mānā and surrounding areas, including: the West Kaua'i Energy Project (as may be revised); infrastructure for Department of Hawaiian Homelands use; water diversions to support instream flows; groundwater use restrictions and needs; siting and construction of a new landfill; the ongoing need for pollution control improvements to the Mānā ditch system; and Kaua'i's acute need for affordable housing. It is difficult to comment on the scoping materials'summary of best management practices because these activities are not	See response to comment #2 regarding alternatives. Under Alternatives 1 and 2, there are no proposed changes to the type or frequency of current activities occurring on Navy and NASA-held leasehold and easement lands. This alternative would not change any use or maintenance of existing infrastructure and would not involve construction, renovation, or demolition of facilities. As required by Hawai'i Environmental Policy Act (HEPA) and National Environmental Policy Act (NEPA) regulations, the project had one scoping period to invite the public to comment on the Proposed Action, identify issues and possible	Alternatives, Cumulative Effects, Existing Operations

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				well-quantified, and it is unclear which activities pertain to the leased and easement lands. Please reissue the materials with these clarifications for further public comment. Thank you for your consideration. /s/ Claire Tonry	alternatives. Another comment period will follow publication of the Draft EIS. Chapter 4 of the Draft EIS includes a list of past, present, and reasonably foreseeable future projects including the West Kaua'i Energy Project and infrastructure maintenance as well as analysis of potential cumulative effects of these projects in combination with the Proposed Action.	
52	Rosalyn Cummings	n/a	1	Addition to correspondence I would like to request for data on water: in the US NAVY and NASA contracted area(s) Water amount usage, water quality, drainage, and maintenance Along with data on the archeology surveys, with updated information on na Iwi kupuna ancestral bones (remains) found. If a FOIA, or UIPA needs to be submitted please be as transparent as possible Along with including the federal, state, and county laws that are being used. In protection of our cultural heritage; hahai holoholo na, kahua, mahi'ai, lawai'a, mo'omeheu, mea ho'olako, and many more. Waiwai is our wealth as na kanaka, kanaka oiwi, po'e kanaka, kanaka maoli It is our natural resources, nutrients of which nourishes aina kino, imprints, and much more .	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Section 3.7 (Water Resources) of the Draft EIS includes relevant details regarding usage, drainage, and maintenance on the leaseholds and easements lands. Section 3.2 (Archeological and Architectural Resources) includes information regarding archeological surveys in the region of influence (ROI) for the project. Section 3.3 (Cultural Practices) of the Draft EIS includes a discussion of cultural practices within the region of influence for the project. Section 1.7.5 (Ongoing Community Coordination) of the Draft EIS includes reference to ongoing coordination with Native Hawaiian Organizations (NHOs) regarding discoveries of human skeletal	Water Resources, Archaeological and Architectural Resources, Cultural Practices

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				Wai is also very important to me Mahalo, Manawaiakea	remains, ongoing coordination with NHOs on construction of Lua Kupapa'u O Nohili (Nohili Burial Crypt), and ongoing coordination for repatriation. Information on how to submit a Freedom of Information Act (FOIA) request can be found at https://www.cnic.navy.mil/About/Freedom-of-Information-Act/. For other resources, please refer to the documents section on the PMRF KPGO EIS (www.pmrf-kpgo-eis.com). Relevant laws and regulations are provided in a table in Appendix E and also located through the Draft EIS in associated sections.	
52	Rosalyn Cummings	n/a	2	ATTN: PMRF and KPGO RE; EIS Project Manager, Ms. Kerry Wells 400 Marshall Road, Building X-11 Pearl Harbor, HI 96860 MEMORANDUM From: Roslyn Nicole Manawaiakea Malama mare Cummings: Under Duress Kalaheo Ahupua'a, Moku O Kona, Kaua'i Mokupuni a Hawaiian Organization - U.S.DOI EMAIL: 315), Kalaheo, Hawaii, 96741, in the Hawaiian Islands mana.eolakakouhawaii@gmail.com SPECIAL Attention: File to the Current Director / CEO / CFO/ District Manager only Not General Processing TMK (1)9-9-001:000 (1)2-002-013-0000 is hereby request, and that a copy be furnished/transmitted to all participants for proof of title (chain of title) concurrent	Appendix C of the Draft EIS includes the original real estate documents for the Proposed Action.	Land Use and Access, Relevant Laws and Regulations

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				to County Tax/Bureau of Conveyances Bureau examines, records, indexes, and digitizes over 344,000 Regular System and Land Court documents and maps annually; issues Land Court Certificates of Title. Kauai County Code, Real Property Assessment Division's purpose is to assess all properties within the County of Kauai, which means, to provide accurate, uniform and timely assessment information; maintain the update ownership information; create and revise tax maps for all of Kauai's properties annually. "alleged" Industrial; Conservation NON-TAXABLE status Government: USA C/O NAVAL FACILITIES ENGINEER CMD ATTN: RE CONTRACTING OFFICER, AM1 258 MAKALAPA DR STE 100 PEARL HARBOR HI 96860 3121		
52	Rosalyn Cummings		3	The United States, State of Hawaii, County of Kauai Agents and Agencies own Oath to uphold U.S. Constitution, Laws and Treaties, makes them legally LIABLE through 42 USC §1983 for VIOLATIONS of the 1949 Geneva IV, 1907 Hague Conventions IV, USC 5 §1331, USC 18 §956, §957, §1623, §1651, §1652, §1653, §1660, §1661, §1091, §2441, §1654, Article 1 §8 and Article 6 §2 of the United States Constitution that are being committed here in the Hawaiian Islands / Sandwich Islands by use of: 1) (TMK) Tax Map Key Numbers to identify Location	Comment noted. The EIS has been prepared consistent with the United States (U.S.) and State of Hawai‘i's environmental regulatory framework.	Land Use and Access, Relevant Laws and Regulations

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				2) (TMK) Tax Map Key Numbers to determine Title 3) (TMK) Tax Map Key Numbers to collect Taxes 4) (TMK) Tax Map Key Numbers to retain Jurisdiction over Internationally Protected Persons and Internationally Protected Property 5) (TMK) Tax Map Key Numbers to Pillage, Destruct, and Appropriate Protected Persons and Private Real Property not needed by Military Necessity 6) (TMK) Tax Map Key Numbers to authorize the carrying of deadly weapons such as Small Arms and Light Weapons. Therefore, committing the act of PILLAGING, DESTRUCTION AND APPROPRIATION under Rules of War 1949 Geneva IV under 18 U.S. CODE §2441 and Violating his Majesty the King of the Hawaiian Islands Kamehameha III 1850 self executing ratified Treaty with the United States of America under U.S. Constitution A rticle 1 §8 and under U.S. Constitution Article 6 §2.		
52	Rosalyn Cummings		4	Agents and Agencies mentioned above must comply and are subject to Kamehameha III Treaty, Constitution, Laws, Civil and Penal Codes of the Hawaiian Islands once within three miles from the low water mark near the shore of the Hawaiian Islands.	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations
52	Rosalyn Cummings		5	That a confirmation of the Hawaiian Islands, Hawaiian Kingdom in continuity, nation-state status as a Neutral Power	See response to comment #3.	Land Use and Access, Relevant

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				(May 11, 1854), be confirmed by the U.S. Department of the Navy (DOD) (U.S. Constitution Art. 6. Sec. 2 Treaties...supreme law of the land….", as the paramount guideline document, governing the conduct and mutual obligations of belligerents and neutrals regarding the "proposal" under consideration. That, the Neutral Power status of the Hawaiian Kingdom, precludes the U.S. Department of Defense (DOD), Dept. of the Navy from obtaining entry in to the Hawaiian Islands by way of the U.S. Federal Constitution Corporation, aka STATE OF HAWAII (SOH), Municipality TMK (tax map key - keyed only with no determination of ownership), whereby illegalities arise under the U.S. Constitution Art. 4. Sec. 3, "New States...no new states may be erected". That, the U.S. Corporation aka STATE OF HAWAII, officially exists only within the 10 mile square of Washington D.C. as permitted under the District of Columbia Act of 1887. That, the SOH adopted the U.S. Federal Constitution (Admiralty, Maritime, Equity), and therefore is already attached to the Consultor , i.e. U.S. Dept. of the Navy, as part of the administering authority, as a municipal and civilian militia, under GENEVA IV, and as such, any participant(s) thus far, who are attached, or function in any way, by or under the authority of the SOH or its Municipalities, MAY NOT UNDER ANY CIRCUMSTANCES		Laws and Regulations

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				be empowered to give CONSENT. That is how Section 106 Consultations are carried out in"Indian country", where consultation does not imply that consent is automatically given. That, the U.S. DOD recognize that "The Apology Law" U.S. Public Law 103-150, 23 NOv. 1993, Pres. W. J. Clinton, HAS NO FORCE OF LAW IN THE HAWAIIAN ISLANDS, but only within the contiguous territory of the 48 United States of America,, and cannot be lawfully used by the US DOD, as an automatic right of entry into the neutral territory of the Hawaiian Islands, currently under U.S. "belligerent" occupation, nor can the US DOD, impose any distinction, exclusion, limitation or restriction upon the neutrals of the Hawaiian Kingdom in continuity, by way of its Corporation aka State of Hawaii, that discriminates, in any way, against the Kanak Maoil, whose "national origins", and vested rights in property and natural resources are perpetual and inherent, under the Hawaiian Laws promulgated in 1841-1842, by His Majesty Kamehameha III, Lahainaluna, Maui. nor their Power and Duties a a neutral nation-state in continuity.		
52	Rosalyn Cummings		6	It is to be understood that, ALL State of Hawaii AGENCIES, or persons or organizations operating under that entity, under color of law or color of statute, doing business in the Hawaiian Islands, are to be considered as consultants to the US DOD Dept. of the Navy, and ARE	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				CONFLICTED OUT, and DO NOT POSSESS THE AUTHORITY TO GIVE CONSENT to the "proposal" under consideration. Furthermore, the location of the proposed activities, by way of a SOH Municipal 'tax map key, keyed only for the purpose of location and taxation, but with "no determination of' ownership, CANNOT BE USED TO INFER OR IMPLY ANY TRANSFER OF THE TITLE TO THE TERRITORY OF THE HAWAIIAN KINGDOM, HAS EVER LAWFULLY OCCURRED, under the U.S. Constitution or the norms of customary international law.		
52	Rosalyn Cummings		7	Although the US Corp. State of Hawaii controls and disposes of the lands and resources within our neutral territory, any parties being of na kanaka descent, or having national origins" in the Hawaiian Kingdom automatically have availed themselves of their neutral status, power and duties, if those persons are a part of any agency or organization of the US Corp. SOH, and they shall be, considered as part of the Belligerent occupation force on land, as articulated in the provisions and prohibitions of GENEVA IV (US 1907 - THE HAGUE), for the purpose of, and in conjunction with this consultation under the U.S. NHPA. For the purpose of this consultation, the terms and conditions of GENEVA V, GENEVA V Chapter 14, the 1955 REVISED LAWS OF HAWAII, dictate the proper protocols, authorities, and entities that are empowered to ensure	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				protection for the " prehistoric and historic properties"CERTAIN RIGHTS OF THE PEOPLE - HAWAIIANA, under the Hawaiian Laws, and Hawaiian Kingdom Flag, second only to the Stars and Stripes of the U.S. that flies over the Hawaiian Islands neutral territory as the flag of a Belligerent, defined in GENEVA IVLaws and Customs of War on Land, and its Annex Regulations Concerning the Laws and Customs of War on Land (U.S. 1907 - THE HAGUE) - (See: "The Apology Law" "...act of war against a friendly nation….", in violation of the U.S. War Powers Act, and international treaty violation US Constitution Article 6. Sec. 2) since Jan. 17, 1893, as that infamous act constituted a military insurrection in support of a coup demain.		
52	Rosalyn Cummings		8	FAILURE TO COMPLY WITH THE PRESENT TERMS , CONDITIONS, AND OBLIGATIONS SPECIFIED IN US DOD DIRECTIVE ON CONSULTATION UNDER SECTION 106 OF THE US NHPA VALIDATES THE CONTINUATION OF THE ONGOING CRIMINAL CONSPIRACY TO ILLEGALLY MAINTAIN CONTROL OVER THE HAWAIIAN ISLANDS & ARCHIPELAGO. As per the terms and conditions of the May 11, 1854 Hawaiian Kingdom (Hawaiian Islands), signing of the "Declaration of Accession to the Principles of Neutrality", and for the purpose of this "Consultation" shall be applicable: RIGHTS AND DUTIES OF NEUTRAL POWERS AND PERSONS IN	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				WAR ON LAND (HAGUE) (1907-THE HAGUE, U.S. Senate advice and consent on March 10, 1908, U.S. Presidential ratification on Feb. 23, 1909, Entered into force on January 26, 1910, Proclaimed by the President of the United States on February 28, 1910, 36 stat.2310; Treaty Series 540 - Convention Respecting the Rights and Duties of Neutral Powers and Persons in Case of War on Land), as follows; CHAPTER I - Rights and Duties of Neutral Powers. Article 1. The territory of neutral Powers is inviolable. Article 2. Belligerents are forbidden to move troops or convoys of either munitions of war or supplies across the territory of a neutral power. Article 10. The fact of a neutral power resisting, even by force, attempts to violate its neutrality cannot be regarded as a hostile act. CHAPTER III Neutral Powers (The nationals of a State which is not taking part in the war are considered neutrals.) Article 17. A neutral cannot avail himself of his neutrality: a - "...commits hostile acts against belligerent; b - "...commits act in favour of a belligerent, or by enlistment. Article 18. "...acts...not...considered as committed in favour of onebelligerent" b - Services rendered in matters of police, or civil administration.		
52	Rosalyn Cummings		9	CHAPTER IV - Compensation shall be paid...in proportion to the material used, and the the period of usage. \ NOTE: Under the Provisions of Article 22.	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				Notification - To the Netherlands Government that the territory of Hawaiian Kingdom in continuity, is under U.S. "Belligerent" occupation as of Jan. 17, 1893, by an "act of war", U.S. President Grover Cleveland, before the Congress of the United States, requesting for notification to all other Powers of the Hawaiian Islands status as a "neutral territory", under international law. In closing, i strongly recommend a review of these un-precidented circumstances that have arisen during thee NHPA Section 106 Consultations by the U.S. NAVY, (AS PART OF CINCPAC Headquarters), regarding the imposed use of U.S.National Historic Preservation Act (NHPA) in the "noncontiguous territory" (U.S.Public Law 99-239 Compact of Free Association Act of 1986 - Title II - Pacific Policy Reports), of the Hawaiian Islands, by reason that the U.S. Corporation aka STATE OF HAWAII CAN ONLY EXIST WITHIN THE 10 MILE SQUARE OF WASHINGTON D.C., THEREFORE THE USE OF THIS FEDERALLY CONSTITUTED CORPORATION TO IMPOSE U.S. LAW IN HAWAII IS A CONSTITUTIONAL VIOLATIONS UNDER ARTICLE 1 SEC. 8, ARTICLE 3. SEC. 8,, ARTICLE 4. SEC 3,. AND ARTICLE 6. SEC. 2. THE QUESTION ARISES AS REGARDS TO, BY WHAT CONGRESSIONAL AUTHORITY OR EXECUTIVE ORDER IS THE U.S. DOD CLAIMING TO HAVE AUTHORITY TO OCCUPY THE NEUTRAL TERRITORY OF THE		

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
				KINGDOM OF HAWAII AND CONDUCT MILITARY TRAINING OPERATIONS.BY WAY OF U.S. LAW? IN SHORT, IS THE CONSULTATION PROCESS A TROJAN HORSE.FOR THE U.S. INDUSTRIAL MILITARY COMPLEX WHICH IS IN COMPLICITY WITH, AND HIDING BEHIND THE CONSTITUENT ELEMENTS OF THE 'ILLEGALLY PROCLAIMED PROVISIONAL GOVERNMENT THAT COMMITTED ACTS OF TREASON ON JANUARY 17,1893? The foregoing comments conclude my submissions for the record of the consultations with the U.S. Department of the Navy, under the U.S. National Historic Preservation Act, Section 106, relating to the protection of historic places and properties, and the Hawaiian Kingdom accession to GENEVA Convention V concerning the RIGHTS AND DUTIES OF NEUTRAL POWERS AND WAR ON LAND, (US 1907, HK 1854). Respectfully submitted for inclusion into the minutes of the April 30, 2018 meeting in Honolulu.		
52	Rosalyn Cummings		10	NOTE: On 2 SEPTEMBER 2018, additions, corrections and clarifications to the original text sent to Capt. Rasmussen USN, in charge of consultation proceedings have been made and are included in this text to be forwarded to Sy Heen Shim, in his capacity as a "protected person under international law, as a descendent of the "Chiefs and People" of the Hawaiian Islands, under Hawaiian Law, promulgated	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				1841-1842 Kamehameha III, Lahainaluna, Maui.		
52	Rosalyn Cummings		11	As a matter of law the government officials in the Hawaiian Islands, being part of the People/citizenry of the United States political subdivision aka State of Hawaii, under the adoption of the U.S Federal Constitution, have sworn an oath “to support and defend” both the United States and state of Hawaii constitutions, which requires them to ensure the native tenants due process of law, the effect of which has been for decades that the State and counties have allowed the destruction of hundreds if not thousands of Hawaiian village sites and “places of worship” throughout the islands, often to support private, and for profit land developments, at times by so-called “Emergency Proclamation'' that inadvertently deprive civil liberties; in correlation to the unlawful enforcement of policies of apartheid by distinction, exclusion, restriction and limitation, based on national origin, race, color, religion and ethnicity, by way of the term “native Hawaiian'' meaning any descendant of not less than one-half part of the blood of the races inhabiting the Hawaiian Islands previous to 1778, who is then subject to the right of the (US)State of Hawaii via Section (7), ARTICLE 2. Hawaiian Homes Commission sub section 201, to the right of the State of Hawaii, by way of the 1978 Constitutional Convention and election of	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				November 7, 1978, to hold the unfettered ability to "regulate" fundamental human liberties of "subsistence" as well as their "cultural and religious" practices, constituting a "Deprivation of rights under color of law, under Title 18 U.S. Code sub-section 242, Deprivation of vested property rights held by native tenants under color of law, under /title 18, U.S.Code Section 241, lending to a Deprivation of due process under the color of HRS (Hawaii Revised Statutes 708.814.5, perpetrating a long-term pattern and practice of "Genocide" through selective enforcement of law, under Title 18 U.S. Code sub-section 1091, Chapter 50AGENOCIDE.		
52	Rosalyn Cummings		12	CONSTRUCTIVE NOTICE is, also, filed regards to the "purpose(s)" of H.B. 2693, in respect for "Native and Part-native" Inhabitants, so situated within the physical maritime and territorial boundariesof the Ahupuaa (District) Moku, Mokupuni, being a part of the Royal Domain of the Hawaiian Kingdom Monarchy, with interests restricted, and subject to the reservation of rights affirmed in 1839 by His Majesty King Kamehameha III, which are included as being part of "Hawaiian National usage", by Her Majesty Queen Liliuokalani on November 25, 1892, (the "crown land" title carries certain specific terms and conditions, i.e. the fee-simple interest is "inalienable", and "private", (the United	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				States Congress in 1993 affirming the unlawful seizure of the "crown lands" by the Republic of Hawaii, and transfer to the United States as "without the consent of or compensation to…their sovereign government…".), and "subject to the rights of tenants…", and who never "voluntarily surrendered…rights in the National lands…", and who are "protected persons", in accordance with the FOURTH (IV) GENEVA CONVENTION (US Signatory 1907 - HAGUE, and the (ICCPR) International Covenant on Civil and Political Rights, Adopted by United Nations (UN) General Assembly Resolution 2200A (XXI) of 16 December 1966 entry into force 23 March 1976, UN Charter.in accordance with Article 49, being upheld under the United States Constitution Article 6, Section 2., per the RLH 1955 - Volume I, Chapter 14, sub Section 14-8 Powers and duties, "Any law to the contrary notwithstanding…", being consistent, and in conformity with United States policy relating to U.S.C. TITLE 16 - CONSERVATION, PART A -Historic Preservation Programs		
52	Rosalyn Cummings		13	NOTICE is hereby given with respect to a request FILED 5 FEBRUARY 2024, for assistance/discretion of the United States Secretary of Interior to determine "that a major aspect of a State program is not consistent" with United States Code TITLE 16 - Part A - Historic Preservation Programs, currently under administration,	See response to comment #3.	Land Use and Access, Relevant Laws and Regulations

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				within the non-contiguous Pacific area of the Hawaiian Islands, due to the absence of a Historic Preservation Review Commission as required, under USC TITLE 16, in order to properly qualify, certify and oversee the certification of historic preservation programs, of any municipality acting as a "local government" including the State of Hawaii, in order to effect compliance with the "requirement of equal footing" per USExec.P. 3309, and RLH 1955 - Volume I, Chapter 14, sub Section 14-8 Powers and duties, "Any law to the contrary notwithstanding…,		
52	Rosalyn Cummings		14	in order to be consistent in regards to the administration of "Historic Preservation Programs", under U.S.C. Title 16 - CONSERVATION, Part A, within the "State system", in lieu of: A. The complete absence of an actively functioning, effective and sufficiently qualified Historic Preservation Review Commission, within the current State system, being administered in the, non-contiguous Pacific area of the Hawaiian Islands, as required to properly qualify, certify and oversee any "local government", including the "State of Hawaii" in the administration of Historic Preservation Programs, per Sec. 470-1(b-A (b) -2 (B), having given rise to: 1. widespread disruption, irreparable destruction, desecration and defiling of historic sites, cultural properties and places, throughout the Hawaiian Islands;	See response to comment #3. Additionally, sections 1.3.6 (Environmental Management and Stewardship), 1.7.5 (Ongoing Community Coordination), 2.5 (Best Management Practices), 3.2 (Archaeological and Architectural Resources), and 3.3 (Cultural Practices) of the Draft EIS describe the Navy and NASA's ongoing commitments to coordination with the Native Hawaiian community, as well as cultural resource management and protection.	Land Use and Access, Relevant Laws and Regulations

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				2. disregard for family honors, rights (burials); the endangering of the lives of persons, their private property, religious sites, interference with and disregard for religious convictions and practices; 3. acts forbidden, unauthorized and malicious methods of seizure, pillage, and destruction, lending to the willful contamination and destruction of watersheds, groundwater reservoirs wetlands, rivers, forests, historic irrigation systems, estuaries and agricultural estates; 4. destruction, desecration, defiling, mutilation and molestation of institutions dedicated to religion, charity, education, the arts and sciences, being acts that are normally "forbidden", under the Fourth IV Geneva Convention, Respecting the Customs and Laws of War on Land, and its Annex Regulations Concerning the Customs and Laws of War on Land, which should be made the subject of legal proceedings; 5. neglect on the part of the "United States, its political subdivision State of Hawaii, Municipalities and its People" to effect compliance with regard to the "equal footing" requirement of the U.S. Executive Proclamation 3309, Pres. Dwight D. Eisenhower (1959), by blatantly undermining, disregarding, avoiding and continually failing to implement and put into effect administrative structures necessary to comply with the purpose and stipulations		

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				in the Revised Laws of Hawaii 1955, Volume I, Ch. 14,		
52	Rosalyn Cummings		15	CERTAIN RIGHTS OF THE PEOPLE - HAWAIIANA, Sections 14-1 thru 14-11, being representative of the "chief governing authority"; a) having brought about conditions intended to bring about the destruction of the group, as a whole and in part, b) having caused a near complete collapse of the indigenous economy, identity and way of life, in correlation to the unlawful enforcement of policies of apartheid by distinction, exclusion, restriction and limitation, based on national origin, race, color, religion and ethnicity, by way of the term "native Hawaiian" meaning any descendant of not less than one-half part of the blood of the races inhabiting the Hawaiian Islands previous to 1778, who is then subject to the right of the State of Hawaii via Section (7), ARTICLE 2. Hawaiian Homes Commission sub section 201, to the right of the State of Hawaii, by way of the 1978 Constitutional Convention and election of November 7, 1978, to hold the unfettered ability to "regulate" fundamental human liberties of "subsistence" as well as their "cultural and religious"practices, constituting a "Deprivation of rights under color of law, under Title 18 U.S. Code sub-section 242, Deprivation of vested property rights held by native tenants under color of law, under /title 18, U.S.Code Section 241, lending to a	See responses to comments #1 and #3.	Land Use and Access, Relevant Laws and Regulations

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				Deprivation of due process under the color of HRS (Hawaii Revised Statutes 708.814.5, and a long-term pattern and practice of "Genocide" through selective enforcement of law, under Title 18 U.S. Code subsection 1091, Chapter 50A - GENOCIDE.		
52	Rosalyn Cummings		16	CC: United States Department of Interior Honorable Secretary, Deb Haaland Attention: U.S. Department of Interior, Solicitor General 1849 C. Street, N.W. Washington D.C. 20420 United Nations, Human Rights Committee, Geneva, Switzerland To: DEPARTMENT OF THE NAVY Commander United States Pacific Fleet 250 Makalapa Drive Pearl Harbor, Hawaii 96860-3131	Comment noted.	Land Use and Access, Relevant Laws and Regulations
52	Rosalyn Cummings		17	SUBJECT; concerning Consultation on the "proposal to continue military readiness activities in the Hawaii Training and Testing Ground (HSTT) Study Area."effects of undertakings in Hawaii, pursuant to Section 106 of the National Historic Preservation Act (36 CFR Ss800), for proposed training, testing and readiness activities located within TMK: (1)9-9-001:000*, in order to "identify historic properties, potential impacts, assess possible effects, and seek ways to avoid, minimize or mitigate any adverse effects on historic properties." Dear Sir, You may, or may not, be aware of the historical fact that on May 11, 1854, His Majesty King Kamehameha the Third (III), by way of His	Consultation for the Hawaii-California Training and Testing (HCTT) Project is outside the scope of this EIS.	Land Use and Access, Relevant Laws and Regulations

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				Exc. Robert C. Wyllie signed the "Declaration of Accession to the Principles of Neutrality" as requested by a U.S. President. As such, the Hawaiian Kingdom, "...territory of neutrals is inviolable.", and the peace and security of our Hawaiian Kingdom (a nation-state in continuity), and the world for that matter, has come into question, due to the lack of international recognition of the Hawaiian Islands as a neutral territory under belligerent occupation (Attachment A) in addition, there are related matters concerning our Maritime Jurisdiction, as a Neutral Power, lying within one marine league (three miles), from the coast of each of our islands (Hawaii-U.S. Convention of May 16, 1854), out to the 200 Mile EEZ, in respect for the protection and hospitality of our ports, harbors and roads, equally extended to all belligerents, so long as they respect our neutrality. In the context of this consultation, as a neutral hors de combat, "historic properties" are defined as, the entire territory belonging to the Hawaiian Kingdom, under belligerent occupation. It is my goal, under this obligation, lest I avail myself of my neutrality, to define the extent of our powers and duties with respect to the conduct of belligerents, and ensure compliance with the terms pertaining to neutrality, and fulfill our mutual obligations and responsibilities as Parties to the Convention, towards the		

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				protection of historic properties to enhance and maintain peace and security throughout the Hawaiian Islands, Hawaiian Archipelago Respectfully submitted, Manawaiakea a Wahine Maoli, (per June 17,1897, letter of protest filed by HRM Queen Liliuokalani, at U.S. State Department Domiciled in the Hawaiian Islands, as Part of the Polynesian Triangle		
53	Lauren Stovall	n/a	1	Aloha kākou, As a concerned resident and Native Hawaiian, I support the "no action" option to not renew the lease for the land that the military is currently occupying as the Pacific Military Range Facility. My concerns are as follows: 1. The Navy has not done their due diligence in advertising necessary information to the community. 2. The Navy is not allowing the community to speak as a group so that we may hear each other's views.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS describes the public review process in detail, including how the Navy and NASA solicited public participation during scoping. This outreach included a 40-day comment period (extended 10 days over the required minimum 30 days), personalized notification letters (174), and multiple consecutive newspaper and social media advertisements (also see Appendices G and H in the Draft EIS). Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to	EIS Process

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					the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
53	Lauren Stovall	n/a	2	3. The Navy is hosting the genocidal Israeli Defense Forces during RIMPAC and training them to continue to murder innocent civilians in Gaza with impunity.	Rim of the Pacific (RIMPAC) Exercise is outside the scope of this EIS.	General Opposition to Navy
53	Lauren Stovall	n/a	3	4. The Navy has restricted access to Nohili (Barking Sands) to Native Hawaiians for cultural purposes such as gathering foods, medicines, lei materials, and spiritual and mental health practices. 5. The Navy has not disclosed which Native Hawaiian Organization has approved its Cultural Impact Assessment.	As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare, and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access) of the Draft EIS, the Proposed Action does not change public access at PMRF. As described in Sections 1.7.5 (Ongoing Community Coordination) and 3.3 of the Draft EIS, PMRF	Cultural Practices, Land Use and Access

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					regularly facilitates access for cultural practitioners. Detailed discussions about cultural practices in the region of influence (ROI) are discussed in Section 3.3 (Cultural Practices), and the Cultural Impact Assessment (CIA) is included in Appendix F. The CIA includes details of interviewees, including their affiliations and biographies. Chapter 5 (Mitigation and Enhanced Management Measures) of the Draft EIS describes actions the Navy and NASA is currently taking to avoid and minimize impacts from the Proposed Action and would continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina.	
53	Lauren Stovall	n/a	4	6. The community wants far more transparency in how the military is caring for the environment. For example: the impact on marine life and surrounding human communities caused by missile testing, and the safety and soundness of fuel storage containers. For these concerns, and more- I strongly recommend the “no action” option to NOT renew this lease. Sincerely, Lauren Kamalei Stovall	The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which	General Opposition to Navy, Water Resources, Biological Resources, Hazardous Materials and Waste, Public Health and Safety

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					includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The scope of this EIS encompasses land-based leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. Potential effects from the Proposed Action to marine resources, including the endangered monk seal and sea turtle that utilize the terrestrial region of influence (ROI), are described in Section 3.4 (Biological Resources) of the Draft EIS. Prior National Environmental Policy Act (NEPA) documents analyze PMRF testing and training activities to resources, including the 2018 Hawaii-Southern California Training and Testing (HSTT) EIS/Overseas EIS (OEIS) and the 2022 Point Mugu Sea Range EIS/OEIS. The HSST can be found on the EIS website at https://pmrf-kpgo-eis.com. Potential effects to public health and safety and hazardous materials and waste are addressed in Sections 3.12 (Hazardous Materials and Waste) and 3.9 (Public Health and Safety) in the Draft EIS.	
54	Joan Heller	n/a	1	It's time to discontinue the training of killing other beings, along with the	On behalf of the Navy and NASA, the EIS team thanks you for your	General Opposition to

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				destruction of Earth's global water, air and land resources! With the historical American mindset towards global military dominance, funded through tax-payer/voter funds, you turn-the-tide I, a Kauai resident	comments and appreciates your participation. The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Potential effects to resources from the Proposed Action are included in Chapter 3 of the Draft EIS. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state.	Navy, Biological Resources, Water Resources
54	Joan Heller	n/a	2	needs to begin with dis-mantling It's time to discontinue the training of killing other beings, along with the destruction of Earth's global water, air and land resources! With the historical American mindset … … turn-the-tide and close the Mana base	The Navy is committed to complying with environmental laws and regulations. The Sikes Act requires military installations to develop and implement a comprehensive plan for natural resource conservation and management. PMRF maintains an	General Opposition to Navy, Biological Resources

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				by rescinding your lease renewal! I, a return Kauai resident (post-WW2 generation) has learned about the violent nature of the colonial American (Euro-centric) culture!	Integrated Natural Resources Management Plan (INRMP) that is updated regularly; the 2023 PMRF INRMP is available to the public and can be found on the EIS website at https://pmrf-kpgo-eis.com. The INRMP serves as a repository for natural resource information, provides guidance on how PMRF is to meet compliance requirements, and sets management goals, required actions, and resources necessary to protect and manage the installation's natural resources. Chapter 5 (Mitigation and Enhanced Management Measures) describes actions the Navy and NASA is currently taking to avoid and minimize impacts from the Proposed Action and would continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina. Specifically, EMM-3 outlines the Navy's commitment to provide the public with annual wildlife summaries, including status updates and data reports and research studies.	
54	Joan Heller	n/a	3	American militaristic training is antithetical to all life…the armed-forces leadership is out-of-control as is the	Comment noted.	General Opposition to Navy

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				President and most of Congress! Down-grade Military Industry, Joan Yamamoto		
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	1	Historical and Cultural Context Public Law 103-150 recognizes two key facts: (1) the importance of land to Kānaka ʻŌiwi, and (2) as a condition of the Admissions Act, public trust lands of the Hawaiian Kingdom were to be held by the State for, among other things, "... the betterment of the condition of Native Hawaiians." Further, Public Law 103-150 finds, in relevant part, "Whereas, the indigenous Hawaiian people never directly relinquished their claims to their inherent sovereignty as a people or over their national lands to the United States, either through their monarchy or through a plebiscite or referendum; Whereas, the health and well-being of the Native Hawaiian people is intrinsically tied to their deep feelings and attachment to the land" (P.L. 103-150 1993). This historical context must inform all analysis of the social and cultural impacts of the proposed action.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. A history of land use is included in Sections 1.3 (Background), 3.2 (Archaeological and Architectural Resources), and 3.5 (Land Use and Access) of the Draft EIS. This history is included as context for the National Environmental Policy Act (NEPA) and Hawaii Environmental Policy Act (HEPA) analysis and decisions to be made regarding the Proposed Action.	Land Use, Cultural Practices, Biological Resources, ESA Species, Air Quality and Greenhouse Gases, Water Resources, Visual Resources
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	2	Purpose and Need Statement The Navy / NASA Environmental Impact Statement (EIS) is an improper instrument for guiding the State of Hawai'i's decision making about public trust lands The Navy and NASA, as petitioners, and the State, as trustee for the lands in question, have fundamentally different interests and obligations. As the	As described in Section 1.1 (Project Introduction and Overview) of the Draft EIS, the EIS has been prepared by a third-party contractor consistent with National Environmental Policy Act (NEPA) and Hawai'i Environmental Policy Act (HEPA) laws and regulations. Board of Land and Natural Resources	EIS Process, Land Use and Access, Relevant Laws and Regulations, Purpose and Need for the Proposed Action

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				petitioner, the Navy and NASA have a conflict of interest with regard to their roles as the sponsors of the EIS because they have an interest in downplaying adverse impacts on State lands. The State on the other hand, has a trust obligation to protect the land and environment, including cultural resources, especially on Hawaiian Trust Lands (i.e. "Ceded Lands"). The State cannot make a responsible decision about these lands without considering its own land management obligations and what care the land requires. Thus, the State must conduct its own planning process to determine the best stewardship practices for the lands at Nohili and Kōkeʻe. In the case Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case, Judge Gary Chang ruled: Public trust lands are state-owned lands that are held for the use and benefit of the people in general of the State of Hawaii. The State of Hawaii is the trustee of these public lands in the public trust. The trustee of the public lands trust has the highest duty to preserve and maintain the trust lands. This duty is broadly coined in the concept of "malama 'aina"—to care for the land. (Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case 2018) Therefore, the State's primary duty is to mālama ʻāina.	(BLNR), as the accepting authority (under Hawaiʻi Administrative Rules [HAR] Section 11-200.1-28), will evaluate whether the applicant-prepared EIS fulfills the intent of Hawaiʻi Revised Statutes (HRS) Chapter 343 and will consider HRS Title 12, Chapter 171 (Hawaiʻi's law governing management and disposition of public lands). A description of existing conditions and potential effects from the Proposed Action to archaeological and architectural resources and cultural practices are discussed in Sections 3.2 and 3.3, respectively, of the Draft EIS.	

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55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	3	The issue at the core of the purpose and need statement in the EIS must be the responsibility as lessee to care for the land as defined by the terms of the lease. In the case Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case, Judge Gary Chang ruled: Public trust lands are state-owned lands that are held for the use and benefit of the people in general of the State of Hawaii. The State of Hawaii is the trustee of these public lands in the public trust. The trustee of the public lands trust has the highest duty to preserve and maintain the trust lands. This duty is broadly coined in the concept of "malama 'aina"—to care for the land. (Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case 2018) Therefore, the Navy and NASA as lessees are governed by the terms of the lease and easements to mālama ʻāina. The purpose and need statement must be rewritten to reflect this duty to clean up and restore the land it leases from the state. The court has found that Navy and NASA activities have caused environmental damage in violation of the terms of the lease and that the State has a duty to enforce the terms of the lease consistent with the principle of mālama ʻāina (care for the land).	Sections 1.3.6 (Environmental Management and Stewardship), Section 2.5 (Best Management Practices), and descriptions of ongoing operations on leaseholds and easement lands in Chapter 3 of the Draft EIS demonstrate the Navy and NASA's efforts to manage and conserve natural and cultural resources. Additionally, Chapter 5 (Mitigation and Enhanced Management Measures) of the Draft EIS describes actions the Navy and NASA is currently taking to avoid and minimize impacts from the Proposed Action and would continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina. The Navy and NASA coordinate with the Department of Land and Natural Resources (DLNR) regarding lease conditions, and copies of the current real estate agreements are included in Appendix C. Potential effects to land use and access are discussed in Section 3.5 in the Draft EIS. The purpose and need statement accurately reflects the Navy and NASA's purpose and need for the Proposed Action.	Purpose and Need for the Proposed Action

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					Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	4	Compliance with the terms of the lease or easement agreements Provide a list of and reports for all site inspections conducted by the Department of Land and Natural Resources of the State lands and seas leased or encumbered by easement by the Navy. This is important to know whether the State has been fulfilling its trust obligations for these public trust lands.	DLNR conducts monitoring and inspections of the Navy and NASA leaseholds and easement lands. Solicitation of past DLNR monitoring and inspection records at PMRF should be made directly to DLNR. Appendix F contains cultural resource investigations such as archeological surveys at PMRF and KPGO and the Cultural Impact Assessment (CIA), conducted in support of this Draft EIS. Appendix M contains natural resource surveys at PMRF and KPGO conducted in support of this Draft EIS. A wetland delineation was conducted in support of this Draft EIS and can be found in Appendix N.	Proposed Action
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	5	Alternatives Statement In line with the purpose and need to mālama 'āina, the preferred alternative should be based on this obligation. The	The Draft EIS includes a description of purpose and need for the Proposed Action (Section 1.4) as well as the alternative selection process	Alternatives

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				alternatives analyzed must include analysis of conducting the proposed actions elsewhere. Please provide all alternatives studies conducted by the Navy for the proposed actions.	(Section 2.2). According to these criteria, Sections 2.3 (Alternatives Carried Forward for Detailed Analysis) and 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis) of the Draft EIS identify the alternatives. Chapter 3 of the Draft EIS analyzes the potential effects for these alternatives carried forward for detailed analysis. Chapter 1 (Purpose of and Need for the Proposed Action) explains the activities conducted at PMRF are considered essential to the national security interests of the United States (U.S.). The Navy would potentially need to relocate and continue these activities at some other location, given the dramatic reduction in capabilities at PMRF because of the loss of the state lands. At present, identifying where and how these testing and training needs could be accommodated—and the consequences and impact analysis of such a scenario—would involve a complex planning, budgeting, and acquisition program that is speculative and beyond the scope of this EIS.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	6	Affected Environment Defining the scope of the affected environment requires analysis that extends beyond the immediate region of	The region of influence (ROI) or area of analysis is defined for each resource in the Draft EIS and summarized in Section 3.1.2 (Effects	Affected Environment, Cultural Practices,

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				influence (ROI) along temporal and spatial axes. Temporal Scope: Environmental effects of past, present, and foreseeable future activities: In order to provide an accurate assessment of environmental impacts for proposed actions, an EIS must begin with a thorough understanding of the baseline and current ecological and cultural conditions of the affected site. Baseline conditions at Nōhili and Kōkeʻe are the environmental conditions which existed prior to military use of the land. A reasonably accurate picture of baseline conditions can be determined by extrapolating from historical records, oral histories, cultural, archaeological, and geophysical studies, and biological studies of relatively intact native ecosystems in neighboring areas which have similar environmental conditions. Understanding current environmental conditions at Nōhili and Kōkeʻe requires a comprehensive study of the cumulative environmental effects of all past military activities at these sites as well as the activities of other land uses, such as commercial agriculture and genetically modified crops. This study must consider effects of the proposed action that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives, including how the proposed action may compound	Analysis). As described in Section 3.1.2, the ROI is the geographic area that could be impacted by the Proposed Action, and the geographic extent is determined by the degree of effect (i.e., the physical reach of any impact on the resource). Within Chapter 3 of the Draft EIS, the affected environment sections describe the current environment (as shaped by historical impacts), and the environmental consequence sections summarize impacts from ongoing activities and identify potential effects from the Proposed Action and alternatives. The methodology for this analysis is included in Section 3.1 (Introduction to the Affected Environment and Environmental Consequences) of the Draft EIS. Additionally, Chapter 4 of the Draft EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions. The cumulative impact analysis includes agricultural use of lands managed by the Agribusiness Development Corporation (ADC) and Kekaha Agricultural Association (KAA).	Archaeological and Architectural Resources, Biological Resources, Cumulative Effects, Land Use and Access

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				or increase the adverse effects of past military activities.		
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	7	Spatial Scope: Region of Influence (ROI): The geographical scope of analysis, or region of influence (ROI) must include environmental effects of proposed military activities on all lands within the installation boundaries, the neighboring areas, as well as more distant sites which are operationally linked to the proposed action and affected environment. According to the Hawai'i Military Land Use Master Plan (See Figure 1), the Navy has nine leases and easements on Kaua'i that expire between 2028 and 2030. These include anOcean Right of Way Lease totalling 7680 acres of ocean space, and a 1,167 acre lease on Ni'ihau, as well as leaves and easements on Mahaka and Miloli'i ridges. These leases and easements should be included in the scope of analysis.	The region of influence (ROI) for each resource is described in Section 3.1.4 (Effects Analysis). The status of the ocean right-of-way (ROW) is described in Section 1.1 (Project Introduction and Overview) of the Draft EIS. Section 1.3.5 (Navy and NASA Use of State Lands) and Appendix D include a description of areas included in the analysis. Ni'ihau is not a part of the Proposed Action and is therefore not analyzed in this EIS. Mākaha and Miloli'i Ridges are a part of the Proposed Action and are, therefore, analyzed in this EIS.	Project Area, Area of Analysis
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	8	Land Use The EIS should incorporate a complete history of land title and land use with maps. A central issue is the Navy and NASA's use of public trust lands (also known as "ceded lands"). The status of these lands are unique in that they are held in trust for a number of public purposes defined by the Statehood Act. The EIS should explain the decision making process, with relevant documentation, for the initial negotiation and approval of the leases and easements.	Detailed discussion of the history of land tenure and land use currently on the leases and easements within the region of influence (ROI) is described in Section 3.5 (Land Use and Access) of the Draft EIS. Twenty percent of ceded land revenue (fees from the leases and easements) goes first to the Office of Hawaiian Affairs (OHA), and the rest to the Special Land Development Fund as required by law.	Land Use and Access, Proposed Action

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55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	9	State Land Use Regulations: The EIS must analyze the land use zoning and permitting requirements.	Detailed discussion on land use and zoning can be found in Section 3.5 (Land Use and Access) of the Draft EIS. Required federal and state permits are discussed in Appendix E.	Land Use and Access, Consistency with State and Local Government Plans and Policies
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	10	Cultural Resources To date, investigations into the number and significance of cultural sites have been superficial. The EIS should include a thorough inventory of the historic sites in the area, discussion of the cultural significance of Nohili and Kōke'e, in relation to the larger cultural landscape, and a discussion as to how the condition of these sites has changed while the Navy and NASA has used these lands. Kānaka 'Ōiwi and the general public currently only have limited access to the affected parcels, and therefore, are denied the right to fully enjoy and conduct cultural, religious, or subsistence gathering practices until the lands are cleaned up and restored.	Detailed discussion of archaeological and architectural resources is included in Section 3.2 and description of cultural practices is included in Section 3.3 of the Draft EIS. These sections also include analysis of potential effects from the Proposed Action to these resources. Appendix F contains cultural resource investigations such as archeological surveys at PMRF and KPGO and the Cultural Impact Assessment (CIA), conducted in support of this Draft EIS.	Archaeological and Architectural Resources, Cultural Practices
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	11	The EIS must incorporate a comprehensive Cultural Impact Assessment (CIA). Pursuant to the Hawai'i Environmental Policy Act (HEPA), and Articles IX and XII of Hawai'i State Constitution government agencies are required "to promote and preserve cultural beliefs, practices, and resources of native Hawaiians and other ethnic groups" (Guide to the Implementation and	A summary of results from the Cultural Impact Assessment (CIA) is included in Section 3.3 (Cultural Practices), and the full CIA is included as Appendix F of the Draft EIS. If deemed necessary, Department of Land and Natural Resources (DLNR) will conduct a Ka Pa'akai analysis.	Cultural Practices

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				Practice of the Hawaii Environmental Policy Act, 2012, 11). The CIA must include an analysis of adverse cultural impacts on Kanaka ʻŌiwi and other cultural practices by military activities at Nohili and Kōkeʻe which have occurred in the past, and which may occur in the future as a result of proposed military activities. The DEIS must incorporate a rigorous Kapaʻakai analysis of the proposed actions, which must include, (1) the identity and scope of "valued cultural, historical, or natural resources" in the petition area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area; (2) the extent to which those resources-- including traditional and customary native Hawaiian rights-- will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken by the LUC to reasonably protect native Hawaiian rights if they are found to exist. (Ka Pa`akai O Ka`aina v. Land Use Commission, 94 Haw. 31. 2000. 36)		
55	Kyle Kajihiro	Ethnic Studies, University of Hawaiʻi at Mānoa	12	Cultural Landscapes: The CIA must consider the entire connected cultural landscape including ocean and mountain spaces. Hawaiʻi law recognizes that in addition to built structures, a cultural resource may also be a natural feature of the landscape, such as a mountain, hill, rock, tree, stream, or animal which has cultural significance to Kānaka ʻŌiwi. This	Methodology used to prepare the Cultural Impact Assessment (CIA) followed Office of Environmental Quality Control (OEQC) guidelines for CIA and are complying with Act 50 provisions in Hawaiʻi Revised Statute (HRS) 343. The methods used were targeted toward providing the state with information	Cultural Practices

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				study should include an in-depth cultural landscape study (CLS) and ethnographic survey (ES). The Papakū Makawalu methodology, developed by the Edith Kanakaʻole Foundation, would be appropriate to employ in the assessment of the cultural meanings and significance of the affected area. Identify and discuss the significance of place names. Analyze the relationships between geographic features and moʻolelo. Analyze how contemporary cultural practices may be affected by the proposed actions.	needed to fulfill Article IX Sec. 7 obligations through Ka Paʻakai analysis. The methods were developed and carried out by two kanaka ʻoiwi cultural scholars/researchers who developed and used methods they considered to be culturally appropriate. The study considers the landscape within a large region of influence (ROI) that includes the entire Mānā Plain and the pali and ridgetops behind it, including the physical and spiritual geography.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawaiʻi at Mānoa	13	Cultural Sites and Resources: Affected sites include, but are not limited to alanui (trails), ahu and heiau (shrines and temples), puʻu (hills), rocks, caves and lava tubes, plants and animals used in traditional healing, hunting grounds, sites for harvesting birds, sites for observation and study of celestial bodies, burial sites, quarries and workshops for tools, and sources of water. Discuss the significance of the sand dunes and wetlands. Discuss the significance of the westernmost orientation of this landscape for funerary spiritual practices.	See response to comment #10.	Cultural Practices
55	Kyle Kajihiro	Ethnic Studies, University of Hawaiʻi at Mānoa	14	Cultural Practices: Pursuant to the Navy's and NASA's lease agreements, easements, and legal obligations, the Navy and NASA must mālama ʻāina to restore ola (life) and create a safe and healthy environment for the well-being of flora, fauna and all interdependent life forms including the	As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare, and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted	Cultural Practices

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				native tenants / hoa ʻāina / beneficiaries. The native tenants must include, but are not limited to: hunters, fishers, and gatherers, lāʻau lapaʻau (herbal medicine practitioners), cultural and religious/spiritual practitioners and their relationship to the ʻāina, surfers, canoe paddlers, oceangoing canoe voyagers, and hula practitioners. Adverse impacts on cultural practices include, but are not limited to restrictions on access due to security or safety restrictions, the destruction of cultural or religious sites, the destruction of environmental resources used in cultural practices, and the disruptions of the view plane and serenity of the area caused by missile launches, lasers, vehicle and aircraft noise, and smoke and dust. Conduct a comprehensive survey of past and current Kanaka ʻŌiwi cultural practicesin the ROI. Identify the cultural sites and resources needed for the revival and/or perpetuation of these cultural practices. What steps must be taken to improve the ability of Kānaka ʻŌiwi and the public to have safe, meaningful, and regular cultural access to these areas? How will the Navy and NASA increase the opportunities for Kānaka ʻŌiwi and the public to safely participate in mālama ʻāina (environmental and cultural restoration activities) in the ROI?	travel and access to Majors Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Chapter 5 (Mitigation and Enhanced Management Measures) of the Draft EIS describes actions the Navy and NASA is currently taking to avoid and minimize impacts from the Proposed Action and would continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina. Specifically, EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders. Appendix F contains cultural resource investigations, such as archeological surveys at PMRF and KPGO and the Cultural Impact Assessment (CIA), conducted in support of this Draft EIS.	
55	Kyle Kajihiro	Ethnic Studies, University of	15	Biological Resources Native Ecosystems: The EIS must adopt an	Potential effects from the Proposed Action to cultural practices and	Biological Resources

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		Hawai'i at Mānoa		ecosystem-scale approach to analyzing the effects of the proposed military activities on the natural resources. This means studying the components, structures, and functioning of affected ecosystems. Individual species cannot be considered in isolation from their ecosystems. Nor can they be considered as separate from cultural relationships with humans. Ecosystems and species that inhabit them are also cultural resources for Kānaka 'Ōiwi.	biological resources are analyzed in Sections 3.3 and 3.4, respectively, in the Draft EIS. Appendix F contains cultural resource investigations such as archeological surveys at PMRF and KPGO and the Cultural Impact Assessment (CIA), conducted in support of this Draft EIS. Appendix M contains natural resource surveys such as vegetation and wildlife surveys, conducted in support of this Draft EIS. Independent of this Draft EIS, cultural and biological resources are conducted within the Project Area.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	16	Threatened and Endangered Species: It is imperative that all rare, threatened and or endangered organisms within the area remain protected. The EIS must incorporate a complete inventory of all rare, threatened and/or endangered plant, insect and animal species including those identified as Native Hawaiian 'aumakua and kinolau (divine bodily manifestations of Hawaiian deities) within the ROI and neighboring areas which are likely to be affected by proposed activities. Affected species must include marine species that could be affected by military training associated with the facility.	See response to comment #7 regarding the region of influence (ROI). The scope of this EIS encompasses land-based leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. Exceptions to marine resources include endangered species, monk seals and sea turtles, that utilize the land ROI covered in the scope of this EIS. Affects to other marine resources are addressed in the Hawaii-Southern California Training and Testing (HSTT) EIS/Overseas EIS (OEIS) (available on the PMRF KPGO EIS website, www.pmrf-kpgo-eis.com). Federally and state-listed species are discussed in the Section 3.4	Biological Resources

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					(Biological Resources) of the Draft EIS.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	17	Invasive Species: The EIS should fully disclose the extent of invasive species threats at the ROI. What is the inventory and extent of invasive species threats at Nohili and Kōke'e? What invasive species have been introduced or spread by military activities? For example, has the coconut rhinoceros beetle, fire ants, or other noxious weeds been detected in the base? What is the Navy and NASA doing to control these threats? Please provide any incident reports of damage to endangered species or habitats by invasive species. Please provide any incident reports of accidental releases or introductions of invasive species, such as: hitchhiking fountain grass or fireweed on vehicles or personnel or the introduction of invasive species such as fire ants, rodents, snakes, spiders, rhinoceros beetles as stowaways on cargo boats, vehicles, and aircraft.	Section 2.5 (Best Management Practices) of the Draft EIS includes the management strategies identified for invasive species in the 2023 PMRF Integrated Natural Resource Management Plan (INRMP). As stated in Section 3.4 (Biological Resources) of the Draft EIS, PMRF maintains an Invasive Species Management Plan to include, but not limited to, control and prevention of invasive species. Please refer to 2023 PMRF INRMP to see a complete list of invasive species managed and present on PMRF (available on the PMRF KPGO EIS website, www.pmrf-kpgo-eis.com).	Biological Resources
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	18	Wildfires: The EIS must provide a complete history of wildfires at PMRF and KPGO, including the dates, causes, extent of damage, and responses. How are wildfires documented, and where is this information reported and archived? What have been the impacts on fires to protected species and habitats? What have been the impacts of fires on cultural sites and resources? How have fire incidents affected the transformation of the ecology? How are biologists and	A copy of the PMRF Brush and Wildland Firefighting Department Internal Procedure is available on the PMRF-KPGO EIS website, www.pmrf-kpgo-eis.com. PMRF ensures that launch areas are maintained free of flammable vegetation and therefore have minimal fire potential, non-native areas are regularly mowed, areas adjacent to pads are pre-soaked with water prior to a launch, and fire and	Public Health and Safety

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				cultural resources specialists documenting the impacts of fires?	emergency service crews are present at every launch. Please see Section 3.9 (Public Health and Safety) of the Draft EIS for more detail. Additionally, the Fire Information for Resource Management System website located at https://www.earthdata.nasa.gov/data/tools/firms provides historic and current wildfire data throughout the United States (U.S.) including Hawai'i.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	19	Socioeconomics / Environmental Justice Environmental Justice Analysis: As mentioned above, the greatest environmental justice impacts will be borne by Kānaka 'Ōiwi who have the most profound connection to the lands in question. The environmental justice analysis in the EIS must not use demographic data to claim that there are negligible environmental justice impacts because all ethnic groups are considered minorities on Hawai'i island. The key considerations in determining environmental justice impacts include: Who has the longest history, deepest connections, and profound knowledge about Nohili and Kōke'e? Who has the greatest stake and is most directly affected by the environmental and cultural impacts there? Who has suffered the greatest historical injustice, cultural disintegration, and dispossession as a result of the history of the U.S.-backed	Regarding concerns related to environmental justice, please see the introductory paragraph on page I-1 of this appendix. Impacts to Native Hawaiian cultural practices are analyzed in Section 3.3, based on direct consultation with knowledgeable Hawaiian cultural practitioners with generational ties to the Mānā Plain and the Project Area. The overthrow of the Hawaiian Kingdom and the U.S. military's involvement is discussed in the Draft EIS analysis of impacts to Land Use in Sections 3.5.1.4 (History of Ceded Lands in the ROI) and 3.5.2 (Environmental Consequences). Potential effects from the Proposed Action to socioeconomics are analyzed in Sections 3.6 in the Draft EIS. As summarized in Section 3.6, the significance of the adverse	Socioeconomics

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				overthrow of the Hawaiian Kingdom and the subsequent seizure of Hawaiian land by the federal government? Whose cultural practices are most adversely affected by Navy and NASA activities in Nohili and Kōkeʻe? Who is exposed to the greatest risk of exposure to toxins, injury, or death in the exercise of their cultural practices? How are subsistence hunters, laʻau lapaʻau practitioners, and Kanaka ʻŌiwi religious practitioners affected by the access restrictions and hazards at PMRF and KPGO?	socioeconomic effects for the No Action Alternative would depend on the number and timing of jobs eliminated at PMRF and KPGO as well as the size of spending reductions associated with these operational changes. All the jobs at KPGO would be lost under this alternative. As many of the employees at PMRF are contractors, they might be able to find employment at other locations on Kauaʻi. As a result, the potential reductions to Navy and NASA operations under the No Action Alternative would result in the loss of jobs at KPGO as well as other jobs associated with the potential loss of activities associated with leaseholds and easement lands. The activities that could be eliminated at PMRF and associated number of jobs that could be lost and is not known at this time; however, could be a significant loss to the local community. Therefore, adverse effects of the No Action Alternative to socioeconomics could be significant. Enhanced Management Measure (EMM)-2 (considering Cultural Practices), in Table 5.2-1 in the Draft EIS, discusses the continued access for subsistence, habitation, commercial activities, access issues,	

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					recreation, religious/spiritual activities, and customs.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	20	Economic Costs: Some questions about the economic impacts of the military activities: What are the costs of clean up and restoration of environmental damage caused by military activity? What is the depreciation in the land's value as a result of military activities? How does the loss of value adversely affect the general public and Native Hawaiians as beneficiaries of the public land trust? What are the opportunity costs? What economic value can be generated by restoring the ecological and cultural integrity of Nohili and Kōke'e?	See response to comment #3 regarding the No Action Alternative. See response to comment #19 regarding socioeconomics.	Socioeconomics
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	21	Noise Noise is one of the major complaints about military activities. The EIS should include consultations with residents of neighboring communities about the effects of noise. This includes the impact of noise from overflights of aircraft. How does noise affect the value of homes? How does it affect quality of life? What public health affects might be induced by chronic noise? How are veterans' mental health affected by the noise? How does noise affect the behaviors of animals, especially endangered species?	Potential effects from noise associated with the Proposed Action to wildlife are discussed in Section 3.4 (Biological Resources), and potential effects to humans are discussed in Section 3.9 (Public Health and Safety) of the Draft EIS.	Noise, Biological Resources
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	22	Air Quality The EIS must provide thorough data on air quality at PMRF. What kinds of documentation and reporting is conducted when there are incidents that	A detailed discussion on air quality can be found in Section 3.10 (Air Quality and Greenhouse Gases) of the Draft EIS, including current conditions and a summary of effects	Air Quality and Greenhouse Gases

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				may adversely affect air quality, such as a fire or training event? What emissions of air pollutants have been reported at PMRFand KPGO? What toxins or hazardous substances have been detected in airborne particulate matter during fires or training events?	from ongoing activities and potential effects from the alternatives analyzed. Additionally, each resource chapter in the EIS contains a table summarizing predictable environmental trends. Potential effects to public health and safety and hazardous materials and waste are included in Sections 3.9 and 3.12, respectively, of the Draft EIS.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	23	Water Resources Nohili and the Māna plain was known to be a site of abundant wetlands. How have military and associated agricultural activities in easement lands affected the wetlands of this area? What is the history and status of aquifers in the vicinity of Nohili? Where are the wells? What is the history of water usage? What has been the impact of past uses of aquifers? Rocket propellent has been associated with perchlorate contamination in many sites in the United States. Perchlorate has been detected in Nohili. What is the status of perchlorate contamination, and what is being done to clean up this hazard and prevent its release? Provide a comprehensive analysis of the PFAS contamination at PMRF and KPGO. Include incident reports of all releases, detections of PFAS in the water, soil, and biota, and the status of clean up efforts.	Potential effects from the Proposed Action are discussed in Section 3.7 (Water Resources) and Section 3.8 (Utilities) of the Draft EIS. The location of the Mānā Well, and a description of the pump capacity, is discussed in Section 3.7 and 3.8. A discussion on Nohili pump, aquifers within the region of influence (ROI), and perchlorate is discussed in Section 3.7. Although a comprehensive analysis of Per- and polyfluoroalkyl substances (PFAS) contamination at PMRF and KPGO is out of the scope of this EIS, the Navy is phasing out the use of PFAS in firefighting foams per the Environmental Protection Agency (EPA), and results from the 2024 Mānā Well water quality testing found that PFAS were found to be at undetectable levels (see the 2024 Mānā Water Well System Water Quality Report available on	Water Resources

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					the PMRF-KPGO EIS website, www.pmrf-kpgo-eis.com). Additionally, a copy of the PMRF Potable Water Sampling Operation and Maintenance Procedure can be found on the website. A wetland delineation on leasehold lands of PMRF was conducted in support of this Draft EIS (Appendix N).	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	24	Natural Hazards, Geology, and Soils What are the hazards due to climate change and sea level rise? What are the risks of tsunamis and hurricanes? What plans exist for preventing contamination of the environment in the event of flooding	A map showing the 3.2-foot sea level rise scenario is included in Section 3.1.2 of the Draft EIS, and predictable environmental trends (including sea level rise) are discussed in each resource section.	Sea Level Rise, Water Resources
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	25	Climate Provide a comprehensive audit of the fossil fuel use and carbon emissions of PMRF and KPGOfrom all sources, including but not limited to the emissions of offshore exercises, rocket launches, flights to and from the facility, ground transportation, and power generation.	Please refer to Section 3.10 (Air Quality and Greenhouse Gases) of the Draft EIS for analysis regarding emissions. Section 1.5 (Scope of Environmental Analysis) of the Draft EIS explains that the scope of this EIS encompasses land-based leaseholds and easement lands, and Navy and NASA's activities on these areas. Therefore, offshore exercises are outside the scope of this EIS.	Air Quality and Greenhouse Gases
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	26	Visual Resources Wide open spaces and views of the mountains is part of the significance of this landscape. What are the Kanaka 'Ōiwi visual resources in the ROI? What is the cultural significance of different view planes?	Potential effects to cultural practices from the Proposed Action are discussed in Section 3.3 (Cultural Practices) of the Draft EIS. Potential effects to visual resources from the Proposed Action are	Visual Resources, Cultural Practices

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					discussed in Section 3.13 (Visual Resources) of the Draft EIS.	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	27	Public Facilities and Infrastructure What are the effects on the quality of roads? What are the impacts of military use of harbor facilities? How are military activities affecting recreational use of the beach, mountain, and ocean resources?	Potential effects to utilities and transportation networks from the Proposed Action are discussed in Sections 3.8 and 3.11, respectively, in the Draft EIS. Effects to recreational use are discussed in Sections 3.3 (Cultural Practices), 3.5 (Land Use and Access), and 3.7 (Water Resources) of the Draft EIS.	Utilities, Transportation
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	28	Toxic and Hazardous Substances The EIS must include comprehensive information characterizing toxic and hazardous substances in soil, groundwater, surface water runoff, uptake in plants and animals, air emissions, marine environments and species, and air borne particulate matter. The Contaminants of Concern (COC) that should be investigated include, but are not limited to: -Munitions and explosives of concern (MEC); -Metals, including lead from small arms munitions, mercury, beryllium, cadmium, arsenic, copper, aluminum, -Depleted uranium (DU), strontium 90, and other radioactive contaminants, -PCBs,dioxins and furans, -Energetics and explosive constituents and their byproducts, -Per-and polyfluoroalkyl substances (PFAS) which is commonly found in fire-fighting foam,	The Draft EIS includes a discussion on the use of best management practices (BMPs) in place to prevent unintentional release of fuels in Sections 2.5 (Best Management Practices) and Section 3.12 (Hazardous Materials and Waste) in the Draft EIS. Section 3.12 includes a discussion of potential effects to hazardous materials and waste from the Proposed Action. Of the listed Contaminants of Concern (COC), the COCs found within the Project Area include munitions; lead batteries; Per- and polyfluoroalkyl substances (PFAS); launch propellants; petroleum, oil, and lubricants (POLs); potential asbestos-containing material; pesticides; and "cabinet scale" aerosols (cleaning agents, solvents, lubricants, adhesives). A discussion of the Best Management Practices (BMPs) used in the management of these materials can	Hazardous Materials and Waste, Air Quality and Greenhouse Gases

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				-Percholorate, a common chemical in rocket fuels, -Petroleum, oil, and lubricants (POLs), -Volatile organic compounds (VOCs), including solvents, pesticides, and herbicides, -Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) and Polycyclic Aromatic Hydrocarbons (PAHs), -Asbestos, -Various kinds of air pollution emissions.	be found in Section 3.12. Air pollution, and the associated BMPs, is discussed in Section 3.10 (Air Quality and Greenhouse Gases).	
55	Kyle Kajihiro	Ethnic Studies, University of Hawai'i at Mānoa	29	Cumulative Impacts The EIS must incorporate data and analysis of the environmental effects of all past military activities at PMRF and KPGO, including: -A comprehensive list of all military activities ever conducted at PMRF and KPGO, including any nuclear, biological, and chemical weapons tests and military activities by other service branches and foreign militaries. -A comprehensive study of toxic and hazardous substances and their effects on the human and natural environment. -A description of all munitions used, the quantities used, the explosive yields, contaminants associated with these munitions, the extent of unexploded ordnance contamination, and the results of any removal actions. -A comprehensive report on wildfires, their causes, responses, and environmental consequences. The EIS must also take into account the	Chapter 4 of the EIS includes analysis of the cumulative effects of the Proposed Action in combination with past, present, and reasonably foreseeable future actions. Section 4.1 of the Draft EIS describes the timeframe for the analysis in this EIS. As stated in Section 4.1.2, "For purposes of this analysis, past and reasonably foreseeable projects are those within 5 years of the preparation of this EIS (i.e., 2019 through 2029)." A relevant list and explanation of activities within the cumulative effects study areas are included in Chapter 4, and a description of current activities is included in Chapter 3 of the Draft EIS. It is out of the scope of this EIS to include a comprehensive list of all military activities, a comprehensive study of toxic and hazardous substances, descriptions of	Cumulative Effects

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				combined environmental and cultural impacts of all past, present, and reasonably foreseeable future projects at or near the project area. Provide a list of all of the public and private users of the facilities at PMRF and KPGO, including the defense aerospace contractors, U.S. and foreign entities, and University of Hawai'i programs such as the Applied Research Laboratory. Thank you for your attention to these comments.	munitions used and any removal, or list of all wildfires at PMRF. A list of the hazardous materials used or stored in the region of influence (ROI) are listed above (in response to comment #28). As discussed in Section 3.9 (Public Health and Safety) and 3.12 (Hazardous Materials and Waste), the Draft EIS includes a comprehensive list of the Standard Operating Procedures (SOPs) and Instructions that are utilized in the management of hazardous materials and waste at KPGO and PMRF. The PMRF-EIS website (mentioned below) contains a document which outlines procedures to be followed in the event of a spill (provided in flow chart form), and is available on the PMRF KPGO EIS website, http://www.pmrf-kpgo-eis.com. A consolidated list of hazardous substances, along with links to the chemical details and regulations for use and storage, can be found at the following website: . The PMRF Oil and Hazardous Substance Spill Contingency Plan, which contains all safety data sheets (SDS) for any hazardous material within the ROI, contains a section which outlines firefighting measures for each chemical stored in the ROI. PMRF Crash/Fire provides	

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					firefighting services to PMRF and, under a Memorandum of Understanding with the County of Kaua'i, Crash/Fire provides firefighting services to the County on non-Department of Defense (DoD) lands. The PMRF Brush and Wildland Firefighting internal procedure, which outlines the procedures for department members while operating and fighting brush and wildland emergencies, can be found on the EIS website. Additionally, the Fire Information for Resource Management System website located at https://www.earthdata.nasa.gov/data/tools/firms provides historic and current wildfire data throughout the United States (U.S.) including Hawai'i. The Hawaii-Southern California Training and Testing (HSTT) EIS has evaluated the number, location, and types of munitions used in Hawaii for Navy activities. The tables, and their respective information, are summarized below. This information can be found in the following tables of the HSST EIS: • Table 3.2-12: Constituents found in munitions (other than explosives) • Table 3.0-12: Typical air explosive munitions used during Navy activities	

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					• Table 3.0-19: Number and Location of Non-Explosive Practice Munitions Expended During Training Activities • Table 3.0-20: Number and Location of Non-Explosive Practice Munitions Expended During Testing Activities • Table 3.0-21: Number and Location of Explosives that May Result in Fragments Used During Training Activities • Table 3.0-22: Number and Location of Explosives that May Result in Fragments Used During Testing Activities • Table 3.0-23: Number and Location of Targets Expended During Training Activities • Table 3.0-24: Number and Location of Targets Expended During Testing Activities • Table 3.0-25: Number and Location of Other Military Materials Expended During Training Activities • Table 3.0-26: Number and Location of Other Military Materials Expended During Testing Activities The 2018 HSST EIS can be found on the PMRF-KPGO Draft EIS website at www.PMRF-KPGO-EIS.com.	
56	Anonymous	n/a	1	No consent. No continued military presence at PMRF. Please restore the land the military occupies to its natural state,	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your	General Opposition to Navy

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				return the lands to the native Hawaiian people, and leave.	participation. Your opposition to the military presence at PMRF is noted. The EIS has been prepared consistent with the United States (U.S.) and State of Hawai'i's environmental regulatory framework. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the State. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
57	Sommer Kauakahi	n/a	1	I support alternative 3: no action alternative. Come spring of 2025, there also needs to be much more advertising/public service announcements made to the public. Banners, radio announcements, newspapers, and social media, so the larger community can also know and be aware. One of my reasons for support in alternative 3, may fall under environmental justice. I am acutely aware of the mental stress & anxiety it gives many Kanaka Maoli, myself included, to see the illegally occupying powers that have no Treaty of Annexation illegally occupying the ceded lands of the lawful	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS describes the public review process in detail, including how the Navy and NASA solicited public participation during scoping. This outreach included a 40-day comment period (extended 10 days over the required minimum 30 days), personalized notification letters (174), and multiple	EIS Process, Cultural Practices, Biological Resources, Land Use, Water Resources

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				Hawaiian Nation. Not only should birds & plants be included in the EIS, but also the reef, the limu, the coral, the opihi limpets etc which are all important natural & cultural resources.	consecutive newspaper and social media advertisements (also see Appendices G and I in the Draft EIS). Public outreach for the Draft EIS public review period will include banners, radio announcements, newspapers, letters, and social media announcements. The Draft EIS public scoping meetings will also be live- streamed and will include an opportunity for public comment. Please refer to Section 3.4 (Biological Resources) for potential effects to wildlife from the Proposed Action. Potential effects to access and to Native Hawaiian practices from the Proposed Action are discussed in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access) of the Draft EIS. Regarding concerns related to environmental justice, please see the introductory paragraph on page I-1 of this appendix. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all	

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					infrastructure from the leaseholds and easement lands. As described in Chapters 1 and 2 of the Draft EIS, the scope of the EIS includes land-based leaseholds and easement lands; therefore, marine resources, such as endangered monk seal and sea turtle, are not covered in the scope of this EIS.	
58	Ron Ikeda	Department of Education	1	Dear Ms. Wells: Thank you for your letter dated April 30, 2024. Based on the information provided, the proposed project will not impact the Hawaii State Department of Education facilities. Should you have any questions, please contact Cori China of the Facilities Development Branch, Planning Section, at (808) 784-5080 or via email at cori.china@k12.hi.us. We appreciate the opportunity to comment. Sincerely, Roy Ikeda, Interim Public Works Manager, Planning Section	On behalf of the Navy and NASA, the EIS team thanks the Department of Education for their participation.	Proposed Action
59	S. Strom		1	Aloha, my 'ohana and I attended one of your meetings recently, and after careful rview of your shared info, I would like to add some comments. I would offer that the Navy has met with the local community in past years over RIMPAC and SONAR concerns, listened to passionate testimony from the people, but to little or no avail. The recent debacle of Red Hill has done little effect on boosting the people's confidence of the Navy's good intentions toward fostering a benevolent relationship with the community of	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. The EIS has been prepared consistent with the United States (U.S.) and State of Hawai‘i's environmental regulatory framework. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and	Existing Operations

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				Hawaii, although we are addressing specifically Kauai's at the moment. I have tremendous respect for our military outside of the operations of the military industrial complex, which we all hope is not operating in continuity, but rather an honest, transparent military which serves and protects its citizens and environment first and foremost, instead of 'forever wars' and invasions.	Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Although impacts at Red Hill are outside the scope of this EIS, the Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). PMRF will continue to engage with the community through partnerships among the military services, private conservation groups, and state and local governments as described in Section 1.7.5 (Ongoing Community Outreach) of the Draft EIS. Chapter 5 (Mitigation and Enhanced Management Measures) describes actions the Navy and NASA is currently taking to avoid and minimize impacts from the Proposed Action and would continue to implement under the action alternatives. Additionally, the Navy and NASA have identified enhanced management measures (EMMs) that aim to promote additional property management protections for the ʻāina.	

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59	S. Strom		2	NASA has tainted itself with deception, and has become an endless vacuum of our tax dollars, with little to show for its gargantuan costs, and zero contribution toward the betterment of humanity. What NASA does not, Space Force and Starlink can do better.	Your opposition to NASA and their activities has been noted.	General Opposition to NASA
59	S. Strom		3	Therefore, I am making the following recommendations: (1) The possible renewal of Navy lease lands reduced to the 410 acres in actual use only, and with stipulations that require the Navy to expand their role and duties to: (A) Utilize an alotted time schedule to provide for humanitarian services to the public, such as: infrastructure assistance, re-generation assistance with lands and expansion of permanent housing facilities, agriculture, and garden communities to those in dire need of generational homes, clean water, energy installation, and other purposes which lend strength, overally health, and continuity of the local communities, among other seafaring, protective duties including (B) assisting with organic regeneration activities of our ocean, waters, marine life, beaches, etc.	The Draft EIS includes a description of purpose and need for the Proposed Action (Section 1.4) as well as the alternative screening process (Section 2.2). According to these criteria, Sections 2.3 (Alternatives Carried Forward for Detailed Analysis) and 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis) of the Draft EIS identify alternatives. As described in Section 2.4 of the Draft EIS, a smaller footprint was considered, but it does not meet the screening factors described in Section 2.2. Chapter 3 of the Draft EIS analyzes the potential effects for these alternatives carried forward for detailed analysis. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-4 discussed the development and continuation of the One Kauaʻi Hui	Alternatives, Purpose and Need for the Proposed Action

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					(Stakeholder Advisory Group) which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders. Finally, EMM-3 outlines the Navy's commitment to provide the public with annual wildlife summaries, including status updates and data reports and research studies.	
59	S. Strom		4	(2) NASA transfer its technologic infrastructure over to the oversight of Space Force, and phase out NASA's presence here on Kauai completely. It is my recommendation that NASA's lease be NOT renewed, and Alternative 3: No Action Alternative be administered.	Comment noted. See response to comment #3 regarding the development of alternatives analyzed in the Draft EIS. Analysis of potential impacts from the No Action Alternative is included in the Draft EIS consistent with legal and regulatory requirements.	Alternatives, Purpose and Need for the Proposed Action
59	S. Strom		5	Mahalo for your outreach, and enabling us t respond to your projections. Respectfully, S. Strom and 'ohana, Kaua'i, HI 96766	Thank you for your participation, on behalf of the Navy and NASA, the EIS team appreciates your recommendations.	EIS Process
60	Susan Strom		1	This is Susan Strom. I live on the island of Kaua'i, and I just wish to share my concerns about the renewal of a lease for NASA, in particular, and this being that NASA has a sordid history of Nazi infiltration in its genesis. And there has been very little that has been done over these many years since NASA's beginning -- NASA's beginning that benefits humanity in any way. We have been, as citizens, funding this organization for many, many years. And the money seems to appear to	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds	General Opposition to NASA

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				just disappear down a black hole. I have not seen with NASA's existence here in Kaua'i any real benefit to help uplift humanity and help humanity here, but we've all been funding it without our own consent. So I don't feel that its lease is something that should be considered for renewal at this time. Thank you.	(Section 2.3.2). Neither action alternative includes additional development. PMRF will continue to engage with the community through partnerships among the military services, private conservation groups, and state and local governments as described in Section 1.7.5 (Ongoing Community Outreach) of the Draft EIS. NASA services, such as geospatial and navigation systems, are discussed in Section 1.3.4 (NASA KPGO Space Geodesy Mission). Analysis of the effectiveness and usage of funding for NASA activities and missions is not within the scope of this EIS.	
61	Alice Parker		1	Okay. Alice Parker, Lihue. Okay. Ready? I'm concerned about the education of the staff's children. The schools here are not very good, I feel. So how are they going to augment the inadequacies of our local schools? Okay. That's it. Thank you so much.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Ongoing community outreach is discussed in Section 1.7.5 of the Draft EIS and includes PMRF's outreach activities to the local Kauaʻi schools. Schools and youth programs that collaborate with the Navy and/or NASA include: Kamehameha Schools, Waimea High School, Kauaʻi Community College, Girl Scouts of American, Boy Scouts of America, and Līhuʻe Middle School. The Navy and NASA are presenting enhanced management measures (EMMs) under the action	Socioeconomics

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					alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders.	
62	Lana Bilbo		1	I'm Lana Bilbo. And then just go? Okay. So I support the no-action alternative. The concerns that I have include the fact that this EIS is not going to take into consideration the environmental impacts in the ocean, which seems really crucial. I know that you guys have a separate EIS for that. But kind of artificially breaking these, like this lease is to support the base, which is doing those things. And it seems like a really artificial way of breaking them up so that you don't have to consider it for this part of the process, which I don't think is right. I think that the lease should very much be available to the public to review. I noticed that you guys only said the words fair market value one time in this entire thing, and it's not written on any of the boards. It kind of seems like you're trying to hide the fact that the previous lease was only for a dollar. Doesn't seem cool. I noticed that	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. We value your concerns. Detailed discussions of alternatives carried forward and alternatives not carried forward can be found in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) and Section 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis). The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action	General Opposition, Proposed Action, EIS Process, Socioeconomics

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				the way that we're able to provide testimony for this is that we have, like, a room in the corner, and we're being recorded and that we don't have an opportunity to engage as the public with each other, as well as with this process. And I think that that is a very obvious strategic ploy that is also used by developers in this county to sort of minimize and isolate the pushback on projects, and it's pretty obvious.	alternative includes additional development. The area of analysis is limited to the leaseholds and easement lands as described in Chapters 1, 2, and 3 in the Draft EIS, and environmental effects from activities conducted on fee simple lands are not within the scope of this EIS. Additional information regarding the history of leases and easements can be found in Section 3.5 (Land Use and Access) of the Draft EIS. As described in Section 3.6 (Socioeconomics) of the Draft EIS, the fair market value will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS describes the public review process in detail, including how the Navy and NASA solicited public participation during scoping. This outreach included a 40-day comment period (extended 10 days over the required minimum 30 days), personalized notification letters (174), and multiple consecutive newspaper and social media advertisements (also see Appendices G and H in the Draft EIS). Outreach for the Draft EIS	

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					public review period will include banners, radio announcements, newspapers, and social media announcements. The format of the public scoping meetings was consistent with Hawai'i Administrative Rules (HAR) Section 200.1-23(d) which requires a separate portion reserved for oral public comments. The Draft EIS public meetings will be live streamed and include a public hearing format. The Hawaii-Southern California Training and Testing (HSTT) EIS and Land-Based Training (LBT) Environmental Assessment (EA) are incorporated by reference and available on the PMRF KPGO EIS website (www.pmrf-kpgo-eis.com). The HSTT EIS examines the in-water impacts to water resources. Appendix C of the Draft EIS includes the current real estate agreements for public review. Details of the original lease amount, as well as amendments, can be found in Section 1.3 (Background). The new real estate agreements, under Alternative 1 and 2, will be negotiated with the Board of Land and Natural Resources (BLNR) for fair market value of the land. ***Note to Reviewers: Based on 12/30/2024 email from J. Chen, waiting for guidance from Navy***	

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					legal on how to respond to K. Ling's request to include the dollar amount in the response.	
62	Lana Bilbo		2	And I'm kind of confused how the cultural impact assessment was initiated in November, but isn't really -- I'm confused how those two things are tied together and especially how no one that I know in the Hawaiian community knows about that or has been consulted. Like, they just found out about this EIS through, honestly, me texting them about it. And so if that process started in November, I'm really confused as to why none of the cultural groups that I work with are aware of that process. And I would say that for now, that's most of my comments. Oh. And I hope that these comments will be made available to the public for review so that we can see what each other are saying, since you've set up this process so that we can't talk to each other. So I hope that the comments will be made available to everybody to look at during this process so that we're not intentionally siloed. Thank you so much.	As described in Section 3.3 (Cultural Practices) of the Draft EIS, Hawai'i Revised Statutes (HRS) Chapter 343 (as amended by Act 50 in 2000) and Hawai'i Administrative Rules (HAR) 11-200.1 requires the disclosure of the Proposed Action on the cultural practices of the community and state, and the 1997 Environmental Review Program (ERP) (Office of Environmental Quality Control) Cultural Impact Assessment (CIA) Guidelines provides methodology and content protocol for the CIA that inform the EIS process. Details about cultural practices and surveying can be found in Section 3.3 (Cultural Practices) of the Draft EIS. All public comments received during the scoping period are included in Appendix I of the Draft EIS. The EIS team looks forward to engaging with you and the members of the public during the Draft EIS public meetings.	Cultural Practices, Consultation
63	Wesley Yadao		1	Okay. My name is Wesley Yadao. I just want PMRF to open more fishing areas to the public, so that it's all about cultural practices that we need. That's about it. That's about it, just opening more fishing	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale,	Land Use and Access, Cultural Practices

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				areas to the public. That's all I have for now.	Welfare, and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Majors Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 and 3.5 (Land Use and Access) of the Draft EIS, the Proposed Action does not change public access at PMRF. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-2 discusses continued access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Access to the project area for cultural practices is also described in Section 3.3 of the Draft EIS. Please contact the PMRF Public Affairs Office for more information: (808)	

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					335-4740 or PMRFPublicAffairs@us.navy.mil.	
64	Punohu Kekauala III		1	My name is Punohu Kekaulua III, and then just go with my -- this is my comment or testimony. The state lands are crown lands belonging to the chiefs via Great Mahele, which were superior land titles, allodial, that belonged to our ancestors, giving Kanaka an undivided shared interest to the lands. In alternative one, they're asking to lease the lands, release them from the State of Hawaii or DLNR. But they have yet to prove these crown lands belong to them to be able to lease them out. Alternative two, where they're possibly thinking about purchasing the land, the Navy wants to purchase, this should be impossible for Navy to buy state or crown lands because the state can't sell something that does not belong to them. And alternative three, to avoid court cases or community uproar, the Navy should be asking descendants of Victoria Kamamalu, who has a title to the property, to lease it, if they want to do it legally from the true owners of the property. The treaty of annexation has yet to be presented as evidence to prove that Hawaii is the 50th state of America. Without it, the Country and Kingdom of Hawaii are still in existence.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The EIS has been prepared consistent with the U.S. and State of Hawai'i's legal and regulatory framework. A history of land tenure and land use in the Project Area is described in Section 3.5 of the Draft EIS. The current real estate agreement is provided in Appendix C.	Land Use and Access, Socioeconomics, Cultural Practices
64	Punohu Kekauala III		2	Kanaka Maoli, or Hawaiian nationals, have a vested right to their country and its lands through -- through birth. With no treaty of annexation, why is the U.S. Navy	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing	General Opposition to Navy, Land Use and Access,

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				here? We are an occupation, so the Navy should change the state to a military government and help with the reconciliation process to give our Kanaka back their rights to self-determination and their private properties. Help hold the fake state and Ag Department accountable for poisoning our precious land and resources. We -- for us Hawaiian nationals, we understand that American citizenship is a voluntary right, not mandatory. So with that being said, administer the law of this land, the kingdom land -- or kingdom law, sorry.	new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. A history of land use is included in Sections 1.3 (Background), 3.2 (Archaeological and Architectural Resources), and 3.5 (Land Use and Access). Potential effects from the Proposed Action to biological resources and public health and safety are discussed in Sections 3.4 and 3.9, respectively, of the Draft EIS. Section 3.12 (Hazardous Materials and Waste) of the Draft EIS includes a discussion of the use of best management practices in place to prevent unintentional release of fuels and adherence to applicable state and federal regulations regarding the disposal of hazardous or toxic wastes.	Hazardous Materials and Waste, Socioeconomics, Relevant Laws and Regulations
65	Jose Felix-Keamoai		1	My name is Jose Felix-Keamoai. I'm a resident of Kekaha here on the Island of Kauai. I'm also an employee, one of the contractors, for PMRF. Contractor name is Koa Lani JV, LLC. We're also involved in the community of Kekaha in youth sports. Organization is Pop Warner Football and Cheer for Kekaha. Hearing the voice of some of family or friends in the	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare, and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using	Land Use and Access

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				community, knowing that I work at the base at PMRF, they always ask: How do you get access to -- to the beach, which would include fishing -- fishing size, fishing grounds? And I believe there's maybe two options that they have. So the question or request would be, what I'm hearing from the community is: Can they open more fishing access at PMRF? Through an MWR permit would be probably the only way that you can access it. Before 9/11, there was beach access all the way through from Kekaha Beach all the way through to Polihale. There was no barriers. People were allowed to fish, walk all the way through and camp, but now they're not -- but now they're not able to camp or fish. Again, only two options. So again, the question or suggestion is to open up more sites to allow non-PMRF workers to be able to have access to the beach, and of course, including water sports, surfing, and -- and scuba diving.	the main gate and affords unrestricted travel and access to Majors Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF for recreational purposes such as fishing and surfing. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. Camping is permitted on the shoreline on Ground Hazard Area (GHA) Easement 2 within Polihale State Park. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-2 discusses continued access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. For more information, please contact the PMRF Public Affairs Office for more information: (808) 335-4740 or pmrfPublicAffairs@us.navy.mil.	
65	Jose Felix-Keamoai		2	Another concern or -- that I hear from the community is questioning if -- if we would	Thank you for your recognition of PMRF services provided to the	Proposed Action, Public Health

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				one day become a responsive base. And the only reason for that is once we become a responsive base, pretty much we would be considered a target. And the concern with the people is that we're going to get basically attacked on this side of the island. So is there any plans to not only make PMRF a testing facility, but a response active facility? And if it does become a -- a response facility, what contingencies -- plans are there to safeguard the community? I want to add and -- and actually just give testimony to in the past, personnel at the base have been very helpful when it comes to natural disasters by using or utilizing the -- the flight line and bringing in supplies. So another question would be: Will PMRF continue to allow to open the runway for national emergencies to bring in supplies, as needed?	community in times of need. The flight line will continue to be available for national emergencies if resources are available. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The scope of analysis for the Draft EIS is the Navy and NASA's use of state lands, and potential effects to public health and safety from the Proposed Action and No Action Alternative are described in Section 3.9 in the Draft EIS. If you need more information, please contact the PMRF Public Affairs Office.	and Safety, Cumulative Effects
65	Jose Felix-Keamoai		3	One more question. Knowing that capabilities or technology is advancing and new developments arise every day, what new developments are in the horizon to expand our -- our technological advancements or keep up with our technological advancements? Or any new radars or technology, when they do become available to this site, will there be the same communication to allow people to be acknowledged and have testimony	Development on the Project Area is not scheduled at this time and is not included in the scope of this EIS. As described in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Draft EIS, under Alternatives 1 and 2, the Navy and NASA propose to maintain the size of current real estate agreements and do not propose any new development or change of use. If	Proposed Action, Land Use and Access

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				to concerns or questions? And that's all my questions. Thank you very much.	and when future development or technologies are proposed at PMRF, the appropriate level of environmental review would be conducted with accompanying public notification.	
66	Nākaiʻelua Villatora		1	ʻO Nātaiʻelua Villatora koʻu inoa. No ka mokupuni o Kauaʻi, ahupuaʻa o Kalapaki, moku o Puna. Noho au ma ka ahupuaʻa o Pōkiʻikauna ma ka moku o Kona. Ke nīnau aku nei wau, pehea aku nei i kēia wahi aupuni o Hawaiʻi, e ai aku i ka hoʻohana ana i kēia mau ʻāina a me ke kumu waiwai ma Kauaʻi nei e pili ana ka military, ka Navy a me NASA. He noi e aʻe, e ano noi haʻahaʻa e hoʻokoaʻe ai a laila. Haʻawi aku ai i nā palapala, hōʻike aku ai i ka palapala i na hoʻoilina nō ka ano ai like ma waena o ka Navy a me NASA me ke aupuni o Hawaiʻi. E hoʻohānai a hoʻohōʻai i ko lākou hoʻohana ana i kā ʻāina. Mahalo nui, mahalo. Okay. So I'm going to switch over to English so you can type. My name is Nākai'elua Villatora, and I am from the island of Kauai from the Ahupua'a of Kalapaki and the Moku of Puna. But I currently reside at the Ahupua'a of Pōkiʻikauna in the Moku of Kona. My testimony would be asking about the original deeds and documents that the Navy and NASA has with the state, and is that provided for a public viewing? Also, would like to -- or would like -- would like to find the -- the documentation of the data of natural resources utilized by the	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Original real estate agreements are included in Appendix C of the EIS. As described in Section 3.4 (Biological Resources) in the Draft EIS, PMRF has an Integrated Natural Resources Management Plan (INRMP) that is updated regularly. The 2023 PMRF INRMP is the most recent version and can be found on the PMRF KPGO EIS website (ww.pmrf-kpgo-eis.com). Natural resource data is collected by PMRF natural resource staff as well as contractors and partnering agencies. Natural resources located in the Project Area and potential effects from the Proposed Action to these resources are described in Section 3.4 of the Draft EIS.	Proposed Action, Biological Resources, Cultural Practices, Land Use and Access, Water Resources

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				Navy, military, and NASA, for instance, like the punawai spring water resources, any other natural resources, like pertaining to rock formation or any boulders, and then also, like, more in-depth details of what they utilize in the said property.		
66	Nākaiʻelua Villatora		2	Another thing that I would like to able to express is how much of the -- I -- I understand, like, they are promoting readiness for the military. And what is that readiness? What details is that readiness about? Like, I want to be able to know, like, what type of -- may be -- how I was, like --I'm, like spacing out on what I was going to say? Kalamai. What are -- what are you trying to be ready for, you know, the type of war, etc.? And then. also, what are the benefits of the kaiaulu, or community, here on Kauai? What are the benefits for us, besides this whole protection of ourselves, you know, from -- from unseen forces? And then also -- I was, like, shoot. Where's my paper. Another thing, I just would like to be able to see more -- more information data on paper, where -- for people to provide. Mahalo.	As described in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Draft EIS, under Alternatives 1 and 2, the Navy and NASA propose to maintain the size of current real estate agreements and do not propose any new development or change of use. Ongoing Department of Defense (DoD) activities on the larger PMRF installation on fee simple land are outside the scope of this EIS, but are publicly available in previous environmental analysis documents (listed in Appendix K of the Draft EIS). Potential socioeconomic effects from the Proposed Action are discussed in Section 3.6 (Socioeconomics) of the Draft EIS. Military readiness activities are actions needed to address challenges across the air, sea, ground, and space domains. Such activities include training and research, development, test, and evaluation activities. Military readiness is further discussed in Section1.3 (Background) of the Draft EIS.	Purpose and Need for Proposed Action, Land Use and Access

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67	Roslyn Cummings		1	Aloha nō, koʻu inoa Roslyn Cummings Manawaiakea, noho au Kalaheo ahupuaʻa, Kona moku, Kauaʻi mokupuni. So I reside in the Kona moku (district), in the Kalaheo Ahupua'a of the Kauai Island in Hawaii. So this is my oral testimony in regards to the Navy and NASA's proposal today. What is the date? May 5th of 2024 oh. Why did I say May? Okay. June 25th (sic) of 2024. Okay. So here's my ʻike ʻoiaʻiʻ, my truth, my knowledge of truth. When water traverses from mauka in our in our forests, and it traverses -- whether underground or above ground, it picks up the nutrients that is needed by everything that surrounds it in its the environment, whether it's the Maoli manu, which is the native birds, or the (indiscernible), the native plants. So when water gets diverted, whether it's mauka or makai, on the shorelines, it affects that Kauai cycle.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Section 3.7 (Water Resources) of the Draft EIS includes a description of natural and manmade water features in the project area. Section 3.3 (Cultural Practices) of the Draft EIS describes culturally important water features in the region of influence, and Section 3.4 (Biological Resources) of the Draft EIS describes the Hawaiian waterbirds and other avian wildlife that utilize freshwater bodies located in Mānā Plain.	Biological Resources, Water Resources, Cultural Practices
67	Roslyn Cummings		2	So one of my greatest concerns with any type of project is to know what the water qualities are, what the water usage is, contaminations. And knowing that the Navy has a history with not good practices here in Hawaii, Kaho'olawe, for instance, Niihau, depletion of water tables. I grew up here on Kauai. My family's actually from here. We were the last family to live in Nu'alolo in Napali. We grew up in Polihale. During the summers, we'd sit -- we'd spend months in the summers there. And so back -- I was born in the '80s. So back in the day, up until the '90s and the early 2000s, we were able to gather	Section 3.7 (Water Resources) of the Draft EIS includes a description of water resources (including water quality monitoring results) in the Project Area as well as potential effects to water resources from the Proposed Action. Additional information on the maintenance of the Mānā Water Well is included in Section 3.8 (Utilities) of the Draft EIS. The 2024 Mānā Water Well System Water Quality Report is available on the PMRF-KPGO EIS website, www.pmrf-kpgo-eis.com. Additionally, a copy of the PMRF	Water Resources, Land Use and Access, Cultural Practices

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				punawai, which is spring water. We would drink spring water, which is no longer accessible. So we don't know exactly what's happening with the water. And these are all within that Navy zone -- what -- what is it called? Easement. Within the navy's easement zone.	Potable Water Sampling Operation and Maintenance Procedure can be found on the website.	
67	Roslyn Cummings		3	As far as NASA, though, my concerns for NASA is there was a point in time where there was a water quality testing that happened in Miloliʻi, M-I-L-O-L-I-I, Miloliʻi. This is a secluded area on the Napali coast. That testing got to UH, but it never became public. And within that testing, there was a high levels of contaminant. The component was iron, and it wasn't a natural iron. So my question is: Is there something that's happening up in that area in NASA and the Navy that they're – they're leasing those lands from the state, is it affecting something below? Is there some kind of natural waterway, there's something seeping from their -- their building? From whatever they're doing up there, is it seeping down into the ground and coming out into that particular area in the reef area that's causing the contaminant to cause a flesh-eating bacteria?	As described in Section 1.3.5 (Navy and NASA Use of State Lands) of the Draft EIS, the Navy's activities at Miloliʻi is limited to the use of passive use reflectors. Section 3.12 (Hazardous Materials and Waste) of the Draft EIS explains that the only hazardous materials that are stored at this site are lead acid batteries which are used to power the solar panels at the site. The batteries are replaced approximately every 5 years and recycled at a local retailer. Section 3.7 (Water Resources) of the Draft EIS describes conditions at this site; there is no Navy use of surface water or groundwater.	Water Resources, Hazardous Materials and Waste
67	Roslyn Cummings		4	Another thing is ancestral burials, iwi kupuna. There's a law -- it's a kingdom law, actually, it's an older law -- and it talks about the law of the sepulcher. And sepulcher, in English terms, is basically graves or burials. And so with this law, it	As described in Section 3.2 (Archaeological and Architectural Resources) in the Draft EIS, PMRF complies with the National Historic Preservation Act through the 2012 Programmatic Agreement, PMRF	Cultural Practices, Archaeological and Architectural Resources,

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				basically protects burials. So whenever we have any kind of disturbances, we have an issue here in Hawaii, where archaeologists come out and have a tendency to remove burials. That's technically desecration in our culture. And regardless of the proper protocols, we need to realize that there's something in our culture called wai wai. Wai wai is a word that you can use for natural resources. Wai wai is a word that you can use for wealth. Wai wai is a word that you can use for imprint. Wai wai is pretty much what bases our sustenance. It's what Kanaka Maoli nā kanaka rely on. And 'aina is everything that we consume. It's part of what we consume. That's 'aina. It doesn't limit to wai or kai. 'Aina is everything that we can consume. So we really need to take into consideration that these practices that we're accustomed to might be more of a haole, foreign, concept versus a Maoli, a native concept, and start to respect these boundaries that our ancestors -- there's this huge gap between what we know now and what our ancestors knew then, and we need to take into that policy and that reverence and respect of what is naturally there.	follows established Native American Graves Protection and Repatriation Act procedures as agreed to in the Comprehensive Agreement Between United States (U.S.) Department of the Navy at Pacific Missile Range Facility, Kauaʻi, Hawaiʻi, and Na ʻOhana Papa o Mana, as well as Standard Operating Procedures (SOPs) in the Integrated Natural Resources Management Plan (INRMP). The Draft EIS describes in Section 3.3 (Cultural Practices) that iwi kūpuna (human skeletal remains) are likely to be found through the sand dunes in the region of influence (ROI). The Navy and NASA recognize the burial grounds in the ROI and regularly coordinate with the Hawaiian community as described in Section 3.3 and Section 1.7.5 (Ongoing Community Coordination) to construct Lua Kupapaʻu O Nohili (Nohili Burial Crypt) and on repatriation. Burials at PMRF are not moved without prior consultation with the Native Hawaiian community.	Biological Resources, Water Resources
67	Roslyn Cummings		5	So if our kupuna -- for instance, the history that I know of where the military base is, so there's an area called Nohili. From what my ancestors taught me is that area is one of the oldest settlements of a Tahitian village, which means that there are Tahitian navigators that navigated to	Thank you for sharing historical context from your ancestors. Water resources, including water quality monitoring results, are discussed in Section 3.7 (Water Resources) and 3.8 (Utilities) in the Draft EIS.	Water Resources, Cultural Practices, Public Health and Safety

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				Kauai and settled in that area. So with respect to the cultural practices of our ancestors that arrived from Tahiti, it makes me very concerned about how many of them are disturbed. So for someone who has a gift of kahea and the gift of being able to create kūleana nā iwi kūpuna, I think about that wai wai, that imprint that our ancestors leave behind, and future generations that are meant to receive that imprint, and that is what is pretty much invaluable. It's --it's a value that has no money mark on it. So I need you guys to understand that water, especially spring, has the necessary nutrients that our body requires, especially for women, because that's part of what our reproductive organs rely on. And that's the type of studies that I think needs to be made in respect to what is natural for us and our environment. So I want that to be stated on record, that I want the protection of our wai, of our punawai, of our waterways, because it doesn't only affect women and -- and our natural ability to reproduce. And the thing is, reproduction in our culture is not limited to making babies. It's also part of our creativity. So when our body has a natural flow, we're naturally creative. And when a -- when we have a male in our lives, like a -- what we call kane, we're able to carry that creativity into their aspect of providing, and then there's a balance between kane and wahine,	Culturally important water features are described in Section 3.3 (Cultural Practices). A history of land use is included in Sections 1.3 (Background), 3.3, and 3.5 (Land Use and Access) in the Draft EIS. As described in Appendix E of the Draft EIS, regulations protecting water resources include the Clean Water Act, the Safe Drinking Water Act, and the State Water Code. For further regulations and laws related to water, please refer to Appendix E. Potential effects to water resources from the Proposed Action are described in Section 3.7. Additionally, a copy of the PMRF Potable Water Sampling Operation and Maintenance Procedure and the 2024 Mānā Water Well System Water Quality Report is available on the PMRF-KPGO EIS website, www.pmrf-kpgo-eis.com.	

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				between male and female. So that's -- it's the bigger scope of things.		
67	Roslyn Cummings		6	Another thing is that we have to think about the mo'omeheu, which is cultural practices. Mo'omeheu is a cultural practice that we carry from mauka to makai, so you're talking about mea ho'olako, which are providers. We also have hahai holoholona which are hunters. And the reason why we stay away from the English terminology is because they're all coded in commerce laws, so we utilize our language, by law, it's our right to utilize. And going back to natural, basic human rights, which is written in the Constitution, which the Navy has to abide by any treaties that are being made in any nation -- right -- nation-to-nation tradition treaties within the state, which is where we're in, we're within Hawaii. So going back to these practices, you have the fishermen, you have the lo'i. These are basically what they consider wetlands. There's all these practices within this ecosystem that we call 'aina, and we call it kuleana. And kuleana is respect and responsibility. So we need to take into that acknowledgement that if we had 100 people in one room, each and every one of us would have a kuleana, and they're all going to be different. And we have to come to that concept that we're all equally doing our kuleana. So I want to, you know, acknowledge that. So mahalo for your time, and I hope this helps.	Cultural practices and resources are discussed in Section 3.3 (Cultural Practices) of the Draft EIS. Appendix F of the Draft EIS includes the Cultural Impact Assessment (CIA). The CIA includes interviews with Native Hawaiian cultural practitioners to identify potential impacts from the Proposed Action on cultural practices. Again, mahalo for providing cultural practices from your ancestors.	Cultural Practices, Land Use and Access, Water Resources

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68	Christopher Ka'iakapu		1	My name is Christopher Lono Ka'iakapu of West Kauai, a generational descendant of West Kauai, a Native Hawaiian. And I would like to testify in support of alternative number three, the no-action alternative. And this is because I believe that the U.S. military presence at PMRF, no matter how much the studies try to do, mitigation measures they try to take, they will only continue to cause destruction of the environment or natural resources in our community. The entire nearby PMRF operation only exists because they create an artificial environment by the destruction of the Mana Plains wetlands in Hawaii's -- what was once Hawaii's largest ephemeral wetlands. And so they -- they create this artificial environment for the operation to exist, thereby creating critically endangered species. These wetland birds and these other great endangered species in the Mana Plains ecosystem would not be critically endangered if it were not for the habitat destruction caused by PMRF operations and the sugar cane industry. They maintain a pump system to pump down the water table and divert natural flood plains so that their --their operation can exist. So I find it very ironic that they're claiming to want to protect critically endangered species when their whole operation is the only reason that these species are -- their whole operation is the only reason that these species are critically engaged in the first place. They	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Your opposition to military presence is noted. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. As described in Section 3.3 (Cultural Practices) of the Draft EIS, wetlands on the Mānā Plain were filled or drained for sugarcane cultivation in the 1850s. The United States (U.S.) military did not begin development in the Project Area until 1940. Section 3.4 (Biological Resources) of the Draft EIS includes a discussion of potential effects from the Proposed Action to endangered waterbird species. The scope of this EIS encompasses land-based leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. Potential effects from the Proposed Action to marine resources, including the endangered monk seal and sea turtle that utilize	General Opposition to Navy, Biological Resources, Water Resources

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				also make no mention of studying or examining near-shore marine species, such as opihi and limu, which are bottom of the food chain. All the microorganisms are bottom of the food chain resources for our greater fishery. And because the operation is right on the shore, I believe that they should be doing that sort of study.	the terrestrial region of influence (ROI), are described in Section 3.4 of the Draft EIS. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leaseholds and easement lands are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	
68	Christopher Ka'iakapu		2	And I -- I don't believe that the Navy will be good stewards. I don't think they have a track record in Hawaii. The entire U.S. military has been a part of the insurrection and overthrow since 1893. And they have bombed Kaho'olawe. They have destroyed Pohakuloa. They have destroyed Makua Valley on Oahu. They have poisoned Red Hill on Oahu. They have destroyed Hawaii's largest, potentially the world's largest, fish pond system of Honolulu to create Pearl Harbor. They have instigated and drawn the Japanese bombing of Pearl Harbor. And they've destroyed the --- the wetlands of Mana. And now they are restricting access not for only Native Hawaiians but all residents on Kauai to what -- what once was some of the most	Comment noted. The Navy's environmental management programs at PMRF are described in Section 1.3.6 (Environmental Management and Stewardship) of the Draft EIS, as well as in Sections 3.2 (Archaeological and Architectural Resources) and 3.4 (Biological Resources). A history of land use in the project area including the Mānā Plain is included in Sections 1.3.1 (Historic Land Use at PMRF) and 3.2 (Archaeological and Architectural Resources). We value your concerns related to other military installations; however, impacts at Red Hill, Pōhakuloa Training Area, and other locations are outside the jurisdiction and	General Opposition to Navy, Land Use and Access, Water Resources, Biological Resources, Cultural Practices

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				productive fishery on the west side of Kauai.	scope of this EIS. The PMRF EIS team suggests contacting government officials to voice concerns regarding other military real estate agreements/operations. Potential effects to access from the Proposed Action are described in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access).	
68	Christopher Ka'iakapu		3	I don't believe that the State of Hawaii has the legal right to even be leasing these lands. The State of Hawaii is a fraudulent organization that is upheld by the U.S., the United States. And rightfully, these -- the lands that are proposed to be leased to the United States Military and Navy is -- is actually Hawaiian Kingdom ceded lands, crown lands, that is rightfully a part of the Hawaiian Nation. And so for the State of Hawaii to claim authority to lease out these lands is illegitimate and illegal according to international law. Yeah, I -- I oppose -- I oppose them renewing its lease. I -- I oppose the U.S. Military being in Hawaii. If they cared about our environmental and -- and cultural resources, then they would -- they would leave. They would go back home and leave us in peace, a peaceful Hawaiian nation, like we're -- we ought to be. I find it very -- I don't know -- telling and insulting that just about of the representatives here, there's probably as much PMRF staff here as there is	Comment noted. The EIS has been prepared consistent with the United States (U.S.) and State of Hawai'i's environmental regulatory framework. Appendix F contains cultural resource investigations such as archeological surveys at PMRF and KPGO and the Cultural Impact Assessment (CIA), conducted in support of this Draft EIS. Appendix M contains natural resource surveys at PMRF and KPGO conducted in support of this Draft EIS. A wetland delineation was conducted in support of this Draft EIS and can be found in Appendix N.	General Opposition, Biological Resources, Cultural Practices, Archaeological and Architectural Resources

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				community, and they are all not of Hawaii. They're all foreigners. So obviously, their interest is not in the best interests of our 'aina and our people. To me, it's just a symbol of continued colonization, and this is not what I want to support in my community. It's not what I think we should be supporting on a global scale. And this is -- this is just upholding the genocidal war machine of the U.S. Military industrial complex. Yeah. They should not renew the lease, and they should leave Hawaii in peace and stop pretending like they -- they are really going to study and care about our -- our environment and our biological and cultural resources. Thank you.		
69	Gordon Willson-Naranjo		1	My name is Gordon Willson-Naranjo. I am in support of the Navy lease because I recognize the importance of defense. And I understand that the impacts, while unfortunate, are a necessary evil. I appreciate the stewardship that the Navy has done on Kauai specifically. I believe the REPI Program is an exceptional means of providing DOD money for conservation and partnership. And I think that if the Navy were to leave Kauai, there would be an impact to the economics, as many folks on the west side specifically rely on the base for their income. That's it.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Ongoing community outreach is discussed in Section 1.7.5 (Ongoing Community Outreach) of the Draft EIS. The potential effects from all alternatives are analyzed and compared in Chapter 3 of the Draft EIS. Also, a comparison of alternatives is included in Section 3.14 (Summary of Potential Environmental Impacts and Mitigation Measures) of the Draft EIS.	General Support for Navy, Biological Resources, Socioeconomics
70	Peleke Flores		1	Aloha. My name is Peleke Flores from Waimea. Yeah. Just give you mytestimony or comments for this meeting. Guess my	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your	EIS Process, Consultation, Archaeological

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				first comment for the meeting is I believe the meeting should be advertised better, like the front page of our local newspaper, versus a little slot in the back. Our local news, social media, state and county websites in the front page, and all our Kauai known -- Kauai-based known NHOs, or Native Hawaiian organizations. I know there's a list out there, but to be able to email everybody about this meeting would help have better due diligence, I guess. There are more -- it seems to me there are more staff members here and partners than community members. And then -- yeah. Doing more better historical research of Mana, Mana's aquaculture would be good, beyond the plantation period and looking at Hawaiian literature that talks about the space and transcribing it. Also, within this process, if we were to go through -- or if the lease is expanded, the -- the area, the agriculture area, should be designated for community use, not big corporations, seed companies, or GMO companies, stuff like -- they should work with NHOs or 'aina-based organizations to restore the place to a semi-functional fish pond, as it once was, and bring back the floating lo'is of Mana. And also, would like to a map or stats data looking at our service, the U.S. service members, how much lives on the base and how much rents outside of the base and how that affects or displaces our local community with higher rent and/or just	participation. We value your concerns. Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS describes the public review process in detail, including how the Navy and NASA solicited public participation during scoping. This outreach included a 40-day comment period (extended 10 days over the required minimum 30 days), personalized notification letters (174), and multiple consecutive newspaper and social media advertisements (also see Appendices G and H in the Draft EIS). Additional details regarding resources analyzed can be found in Chapter 3. Sections 1.3 (Background), Cultural Practices (Section 3.3), and Land Use and Access (Section 3.5) of the Draft EIS include a description of the history of land use in the region of influence. Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities are described in cumulative analysis (Chapter 4 of	and Architectural Resources, Cultural Practices, Land Use and Access, Socioeconomics, Water Resources

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				spaces to live at. I would like to see that stats. And I think for now that's all I got. I'm still going to do more research, and also with -- with all these resources and partners helping pull this EIS together, they should have the resources to reach out better than how they're reaching out now. Also, with the NEPA process and the new addition, the new update to the NEPA process of consulting indigenous knowledge to help guide this Section 106 in the EIS process. Mahalo.	the Draft EIS) but are not conducted by the Navy or NASA. These lands are leased by Department of Land and Natural Resources (DLNR) to Agribusiness Development Corporation (ADC) and Kekaha Agricultural Association (KAA) as described in Chapter 4. Refer to Section 4.1.5 (Past, Present, and Reasonably Foreseeable Future Actions) in regard to renewable and clean energy projects ongoing and slated for future development including the Mānā Plain Open Floodable Space Project and nature-based solutions. The Navy and NASA work to ensure that essential communities and individuals are informed and engaged during the entire process. Sections 3.2 (Archaeological and Architectural Resources) and 3.3 (Cultural Practices) of the Draft EIS describe this outreach for Section 106, Hawai'i Revised Statutes (HRS) 6E, and Cultural Impact Assessment (CIA) processes. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the 'āina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-1	

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					discusses how the Navy will continue consultations with the State Historic Preservation Officer, the Advisory Council on Historic Preservation, Native Hawaiian Organizations (NHOs), and interested organizations to develop measures to avoid, minimize, and mitigate effects to archaeological and architectural resources. EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders.	
71	Mike Long		1	My name is Mike Long. I live in Kauai for about 12 years. I talked to the commander, and most of the questions I asked, he had no answer for. He doesn't know what the budget was for last year. What kind of commander doesn't know what his budget is? It seems either -- I don't know -- false or not smart. I mean, he's got to know -- he -- he totally blew it off. And I know, like, several years ago, it was, like, $6 billion, and their rent they were paying was $1 a year. So the military gets everything, and Kauai gets nothing. And he says they're going to renegotiate, and it's going to be millions this time. And we don't know who's negotiating for Kauai. In the military industrial complex,	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The annual operating budget is outside the scope of this EIS, the scope of which is limited to the Proposed Action described in Chapter 2 of the Draft EIS. As described in Section 3.6 (Socioeconomics) in the Draft EIS, new real estate agreements would be at a higher price than previous negotiations in the 1960s. The proposed real estate agreements would be at current fair market value and would be determined through negotiations with the Board	Socioeconomics, EIS Process

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				they fund politicians, and the politicians are going to be the ones negotiating on our behalf. And I don't feel like we will get a fair shake out of that. And he said it would be -- it would be market value for the next -- next lease. And the market value for that base would be no telling how many billions of dollars. No way they're going to play market value. And one other question I asked is what if we don't renew the lease? Didn't have a good answer for that one, either. And I don't like the fact that they're not wearing their uniforms. They're trying to be friendly. But if you're representing the military, if you're a commander, I'd be wearing my full commander outfit, wouldn't you? So I asked about giving comments, and he said: Oh, you have to do this. And I wanted to ask questions and make them answer my questions in front of everybody, because they didn't answer me. But they've already headed that off with a pass. So this is not a really good informative meeting. It's a presentation with a lot of nebulous terms that nobody's going to understand. And not knowing their budget for last year seems like a pretty big red flag to me.	of Land and Natural Resources (BLNR). The Draft EIS public scoping meetings will host a public comment hearing session in a public hearing-like platform.	
71	Mike Long		2	I hope our representatives do better than I think they're going to do, but I don't know. And according to the environmental study, everything they do harms the environment here. I mean, they're a military organization. They drop	The Navy complies with federal, state, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies). The	Biological Resources, General Opposition to Navy

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				bombs in the water. They use sonar that affects the whales. And they say -- oh, they try to mitigate that. If there's whales around, they don't use the sonars, whatever. You know that's not true. They do what they're going to do no matter what. And we didn't even get to the part about all their tests are scripted. They spend billions of dollars a year, and they couldn't shoot down an enemy rocket if our lives depend on it, and they do. They -- all the tests are rigged so it looks like they're doing something good, and they're spending billions of dollars to do it. It just seems like a tremendous waste of money to me, and it has negative impact on Hawai'i. I don't think we should renew their lease at all, and I think they would have a big panic attack if we threatened to do that. So that's my comments. I hope it helps the people of Hawai'i. Thank you for your time. So how'd I do?	Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. As described in Chapters 1 and 2 of the Draft EIS, the scope of the EIS includes land-based leaseholds and easement lands; therefore, marine resources, including whales, are not covered in the scope of this EIS. Potential effects from the Proposed Action to marine resources, including the endangered monk seal and sea turtle that utilize the terrestrial region of influence (ROI), are described in Section 3.4 (Biological Resources) of the Draft EIS.	
72	Darlyne Mcleod		1	So my name is Darlyne McLeod, and I was thinking that a wonderful idea would be should we go with the alternative where the base/PMRF and NASA buy the land outright for fair market value, that some percentage of that money that would be made from that sale be applied towards affordable housing for the Island of Kauai, so that basically some of that money would be able to go back into the	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation and notes your preference for Alternative 2. Section 3.6 (Socioeconomics) of the Draft EIS includes an analysis of potential effects of the Proposed Action. The Navy and NASA are presenting enhanced management measures	Alternatives, Socioeconomics

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				community and there'd be a direct benefit to this sale.	(EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders.	
73	Sherri Cummings		1	My name is Sherri Cummings and I am a DHHL waitlister, Department of Hawaiian Home Land Trust 1920 Rehabilitation Act federal program. My concerns that I have is the ability to actually be part of the stakeholders who would have some type of benefit returned to them. Majority of our agriculture lands is on the west side of the Island of Kauai, and they are part of the lands that I believe could have some benefits regarding water transmission lines and nopportunities for us to be placed on lands that is being held in trust for us. And I think we should have beneficiary consultation to support the efforts of the Department of Hawaiian Home Land placing us on ag awards. The last ag award was in the year 1985. their leases and were promised tohave re-awarded leases, and that never happened. Four families died without being placed on	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used, including	Socioeconomics, Water Resources, Consultation, Land Use and Access

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				the list. And there's only one family today that has what we would consider insufficient water source for what he does on DHHL's lands. So that is my primary concern. And the reason why we don't have these ag awards words is basically the lands are -- were deemed lands that could not be farmable or have pastoral opportunities, because of lack of water. There were five families that were awarded in the early 1960s, and four families gave back and that never happened. Four families died without being placed on the list. And there's only one family today that has what we would consider insufficient water source for what he does on DHHL's lands. So that is my primary concern.	which easements are restrictive use for agricultural activities. These agricultural activities are described in cumulative analysis (Chapter 4 of the Draft EIS), but they are not conducted by the Navy or NASA. These lands are leased by the Department of Land and Natural Resources (DLNR) to Agribusiness Development Corporation (ADC) and Kekaha Agricultural Association (KAA) as described in Chapter 4. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders. EMM-5 also discusses the establishment of a Kauaʻi Navy-DLNR-Department of Hawaiian Homelands (DHHL)-ADC working group to collaboratively manage water resources in West Kauaʻi.	

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73	Sherri Cummings		2	I have other concerns regarding, you know, Niihau ohana having opportunities to have infrastructure to support themselves regarding water and electricity. And the Hawaiian families that was relocated from Niihau to Kauai, and they have the opportunities, as well, to have some sort of repatriation, for lack of better word, regarding how they were removed from their lands, my family's included. My mother's great-grandmother left the island, the first wave of native Niihau people. Her name was Kahinawe Keo, and she came with her mother, Ho'a'a, and her father Wahinealoha Keo. And so just trying to see if there's opportunities where Niihau people can benefit from what is happening on the -- the west end. And I think, you know, in all honesty, the DHHL beneficiaries should be at the priority, because we are actually still held by the federal government in a program that was -- that was passed congressionally in the year 1920 by our Prince Jonah Kuhio Kalanianaole. And as a condition of statehood, that rehabilitation act came with being a condition as a federal compact. So I -- I feel that for all intents and purposes, DHHL beneficiaries should be at the table in all decision making moving forward. Thank you.	As described in Section 3.6 (Socioeconomics) in the Draft EIS, new real estate agreements would be at a higher price than previous negotiations in the 1960s. The proposed real estate agreements would be at current fair market value, and would be determined through negotiations with Board of Land and Natural Resources (BLNR) and could ultimately benefit the state, with approximately 20 percent of proceeds going first to Office of Hawaiian Affairs (OHA) (as described in Section 3.6 of the Draft EIS).	Land Use and Access, Cultural Practices, Consultation, Socioeconomics
74	Alice Parker		1	1-We definitely need to ensure a strong presence here on this westernmost outpost of the USA to deter potential armed incursions here with their object of attacking the USA.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Section 1.3 (Background) of the Draft EIS further	General Support for Navy

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					describes the Navy and NASA's land use and respective missions at PMRF.	
74	Alice Parker		2	2. Consider the local importance of our major garbage dump (Mount Trashmore, as some of us call it) - this will soon reach its mandated utmost height of 27 ft (I believe by 2030 or so) and this is a major consideration for Navy + NASA when planning future expansions.	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Finding a new location for a landfill is not within the scope of this EIS.	Proposed Action
74	Alice Parker		3	3) Thank you, mahalo, for this opportunity to enact with our residents	Thank you for participating in the scoping session for this project.	EIS Process
75	Sandy Phillips	Retired	1	Kauai desperately needs a new location for a landfill. Aparently no location can be found. Do you need all the easement land or could you consider part of that land be set aside for a new landfill? This is a project with great benefits for PMRF as well as the civilian population of the island. Thank you for considering the idea.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. Finding a new location for a landfill is not within the scope of this EIS.	Proposed Action

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76	Anonymous		1	I support option #3. Not renew military contract. There does not appear to be enough evidence to support the impact the military is having on our ocean! I do not mind the military on the land it just that the land is the bases for the onset of horrific devastation to our ocean with war games and military ocean practices.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. We value your concerns. Analysis of potential impacts from the No Action Alternative is included in the Draft EIS consistent with environmental regulatory requirements. Section 2.3.3 (Alternative 3) of the Draft EIS, includes the analysis of the No Action Alternative. The No Action Alternative consists of the process that would take place if the leases and easements are not reissued to the Navy and NASA by the state. Under the No Action Alternative and consistent with the terms of the lease, negotiations could result in decisions to remove all infrastructure from the leaseholds and easement lands.	General Opposition for Navy, Water Resources
76	Anonymous		2	I do not like NASA land negotion intertwined with the Navy. I support NASA to maintain their contract.	In consultation with Department of Land and Natural Resources (DLNR), the Navy and NASA determined that coordinating Hawai‘i Revised Statutes (HRS) Chapter 343 real estate efforts in one document would be more efficient for Board of Land and Natural Resources (BLNR) review.	EIS Process, General Support for NASA
77	Malcolmn Pryor	Resident Kekaha	1	Amazing new developments! I wanted to show my support and learn more.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Proposed Action	General Support

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					and alternatives are described in detail in Chapter 2 of the Draft EIS.	
78	Matt Sneed	PMRF	1	Koke'e NASA land use area has Kauai County labeled vehicles that appear abandoned. Will those items be removed prior to lease renewal	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The abandoned vehicles on NASA's leaseholds have been removed.	Hazardous Materials and Waste
79	Nākaielua Villatora Lobilina	E Ola Kākou Hawai'i	1	Provide Original Deed or Agreement (Document with the State to "obtain" lease.	On behalf of the Navy and NASA, the EIS team thanks you for your comments and appreciates your participation. Navy and NASA's original real estate agreements are included in Appendix C of the Draft EIS.	Proposed Action
79	Nākaielua Villatora Lobilina	E Ola Kākou Hawai'i	2	Under what laws does NASA & Navy operate under?	A detailed table of applicable laws, regulations, and polices governing the Navy and NASA can be found in Appendix E of the Draft EIS.	Relevant Laws and Regulations
79	Nākaielua Villatora Lobilina	E Ola Kākou Hawai'i	3	Concern for another 65 year lease of mismanagement and utilization of natural resources aina, wai/punawai/pohaku, etc.	Potential effects from the Proposed Action to biological resources are included in Section 3.4, to water resources in Section 3.7, and to archaeological and architectural resources in Section 3.2 of the Draft EIS. As described in Section 2.2 (Alternative Screening Process) of the Draft EIS, screening factors include long-term use of state land currently used to support Department of Defense (DoD) and NASA missions on Kaua'i; noting that long term is anything over 25 years and not necessarily another 65-year	Biological Resources, Water Resources

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					lease term. Lease terms will be negotiated with the Board of Land and Natural Resources (BLNR).	
79	Nākaielua Villatora Lobilina	E Ola Kākou Hawai'i	4	What benefits to the kaiāulu does these renewal of the leases provide?	Potential effects from the Proposed Action to the community are discussed in Section 3.6 (Socioeconomics) in the Draft EIS. Section 1.7.5 (Ongoing Community Outreach) of the Draft EIS, describes how PMRF regularly coordinates with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively.	Cultural Practices
79	Nākaielua Villatora Lobilina	E Ola Kākou Hawai'i	5	Does the military recognize the ke kanawai o Kō Pae 'Āina Hawaii?	The EIS has been prepared consistent with the United States (U.S.) and State of Hawai'i's legal and regulatory framework.	Relevant Laws and Regulations
80	Mary Hannah		1	FYI - Many peoples in Kekaha have no vehicles and we would like to have re-cycle bins that we could walk to - in areas that would not bother residents. Yes - we/I have emailed Mel Rapoza.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional	Utilities

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					development. The area of analysis is described in Section 1.5 (Scope of Environmental Analysis) of the Draft EIS. Providing recycling bins in Kekaha is outside the scope of this EIS. The EIS team suggests contacting PMRF officials to voice concerns regarding additional recycling bins.	
81	Kainoa Nakazawa	Surfer/fisherman	1	Growing up on Kauai we had many opportunities to enjoy the beach with free acces. (behind pmrf ??? etc), now its restricted (because bin-laden). I understand PMRF gives access, with a screening process but what's the point? Nothing has ever happened to the base were not at war why can't the locals enjoy the beach free and clear. I grew up driving on teh beach with my family fishing, surfing, enjoying the beach that YOU dont OWN. By limiting our access you are restricting liming our access to our cultural resources and taking away from our keiki that should be able to enjoy and learn from kapuna. Please open up free access remove the poles on teh sand If WE CANT OWN the beach YOU CANT either.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare, and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access) of the Draft EIS, the Proposed Action does not change public access at PMRF. The Navy and NASA are presenting enhanced management measures	Cultural Practices, Land Use and Access

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					(EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-2 discusses continued access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	
82	Lana Bilbo		1	1. This land is being used to support the activities of the base, which is training with rockets, missles and bombs. The impacts of the supported activities should be part of this EIS.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. The area of analysis is described in Section 1.5 (Scope of Environmental Analysis), and the aspects of the activities that occur in the Project Area (leaseholds and easement lands) are described in Section 1.3 (Background) of the Draft EIS. As described in Section 1.3.3 (Navy Mission at PMRF), all PMRF testing and training activities have all been previously addressed in the 2018 Hawaii-Southern California Training and Testing (HSTT) EIS/Overseas EIS (OEIS) and the 1998 PMRF Enhanced Capability EIS. Both documents are publicly available and can be found on the PMRF KPGO EIS website (www.pmrf-kpgo-eis.com).	Area of Analysis

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82	Lana Bilbo		2	2. The EIS should consider a 4th alternative: the restoration of the Mana plains to wetlands and cultural practice areas. The base is what prevents this. There used to be a huge loko i'a.	The Draft EIS includes a description of purpose and need for the Proposed Action (Section 1.4) as well as the alternative screening process (Section 2.2). According to these criteria, Sections 2.3 (Alternatives Carried Forward for Detailed Analysis) and 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis) of the Draft EIS identify alternatives. As described in Section 2.4 of the Draft EIS, a smaller footprint was considered, but it does not meet the screening factors in Section 2.2. Chapter 3 of the Draft EIS analyzes the potential effects for these alternatives carried forward for detailed analysis. As described in Section 1.3.6 (Environmental Management and Stewardship) and Section 4.1 (Introduction to Analysis), the Draft EIS also addresses the present and future Readiness and Environmental Protection Integration (REPI) Programs, including promoting regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds on the Mānā Plain. A wetland delineation on leasehold lands of PMRF was conducted in support of this Draft EIS (Appendix N). Cultural practices in the Project Area are discussed in Section 3.3 (Cultural Practices) of the Draft EIS.	Alternatives

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82	Lana Bilbo		3	3. Advertising of this event was inadequate. There were more Navy staff than community members at all 3 events.	Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS describes the public review process in detail, including how the Navy and NASA solicited public participation during scoping. This outreach included a 40-day comment period (extended 10 days over the required minimum 30 days), personalized notification letters (174), and multiple consecutive newspaper and social media advertisements (also see Appendices G and H in the Draft EIS).	EIS Process
82	Lana Bilbo		4	4. The federally recognized Native Hawaiian Organization (NHOs) need to be consulted as part of the Section 106. This should be discussed openly at meetings. It was not in the first two.	As described in Sections 1.7.5 (Ongoing Community Coordination), 3.2 (Archaeological and Architectural Resources), and 3.3 (Cultural Practices), consultation with Native Hawaiian Organizations (NHOs) is ongoing. Consultations conducted as part of Section 106 are described in Section 3.2 of the Draft EIS. Native Hawaiian cultural practitioners were interviewed as part of preparation of the Cultural Impact Assessment (CIA), as described in Section 3.3 (Cultural Practices) and Appendix F in the Draft EIS.	Archaeological and Architectural Resources, Cultural Practices
82	Lana Bilbo		5	5. Traditional gathering rights ned to be respected without need to show "state" ID or being franted a permit or being followed around on base.	As described in Section 3.3 (Cultural Practices) of the Draft EIS, PMRF began the Morale, Welfare, and Recreation (MWR) Guest Card Program in 2005, which allows	Cultural Practices

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					civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access) of the Draft EIS, the Proposed Action does not change public access at PMRF. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	
82	Lana Bilbo		6	6. The leases should be in your info packet for community review.	The leases are available in Appendix C of the Draft EIS.	Proposed Action
82	Lana Bilbo		7	7. Displacement of people born in Hawaii should be considered.	Potential effects to socioeconomics from the two action alternatives and the No Action Alternative are described in Section 3.6 (Socioeconomics) of the Draft EIS.	Socioeconomics
82	Lana Bilbo		8	8. The unfair $1 lease should be backpaid, in addition to the market value moving forward.	Backpay for existing leases and easements held by the Navy and NASA are not within the scope of this EIS. As described in Section 3.6 (Socioeconomics) in the Draft EIS, new real estate agreements would be at a higher price than previous negotiations in the 1960s. The proposed real estate agreements	Socioeconomics

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					would be at current fair market value, and would be determined through negotiations with the Board of Land and Natural Resources (BLNR).	
82	Lana Bilbo		9	9. any agriculture +work+ conservation done on the Mānā plain should restore the wai, the native wetland ecosystem, and be done via NHOs, to rectify the ongoing environmental injustice the base perpetuates.	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development. The Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix D of the Draft EIS includes an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities conducted by Kekaha Agricultural Association (KAA) and Agribusiness Development Corporation (ADC) are described in cumulative analysis (Chapter 4 of the Draft EIS). A history of land use in the Project Area is included in Section 1.3 (Background) and Section 3.5 (Land Use and Access). Also, please refer to Section 4.1.5 (Past, Present, and Reasonably	Biological Resources, Water Resources

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
					Foreseeable Future Actions) in regard to renewable and clean energy projects ongoing and slated for future development, including the Mānā Plain Open Floodable Space Project and nature-based solutions. A wetland delineation on leasehold lands of PMRF was conducted in support of this Draft EIS (Appendix N). Regarding concerns related to environmental justice, please see the introductory paragraph on page I-1 of this appendix.	
82	Lana Bilbo		10	10. The public should have the opportunity + space to talk as a hui at these meetings so we can hear each others concerns.	The Navy and NASA work to support the access, notification, and ability for all stakeholders to contribute in the public scoping sessions. The format of the meeting was selected to provide the public with the greatest opportunity to interact with specialists working on the EIS. The Draft EIS public meeting will also include an opportunity for comment via a public hearing format.	EIS Process
82	Lana Bilbo		11	11. The psychological impact of the bases presence should be considered + studied. It is a physical reminder of the illegal occupation of the Hawaiian Islands. It is also being used to train genocidial militaries, including the Israeli Defense Forces. This is a disproportionate impact on the psychology of Hawaiian kanaka 'oiwi and Hawaiian nationals.	The Proposed Action is described in Chapter 2 of the Draft EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional	Public Health and Safety, Cultural Practices, General Opposition to Navy

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
					development. Potential effects from the Proposed Action are described in Chapter 3.	
82	Lana Bilbo		12	12. If the agriculture on the mānā plain is using pesticides + heavy chemicals with studied or suspected health impacts, that has a disproportionate impact on Kekaha + the west side, which has a concentration of minorities in the community. The activities on these easements should not harm our community via the above.	The Navy and NASA's activities on leasehold and easement lands are described in Section 1.3 (Background) of the Draft EIS. Appendix C and D of the Draft EIS includes an additional breakdown of how these lands are used, including which easements are restrictive use for agricultural activities. These agricultural activities are described in cumulative analysis (Chapter 4 of the Draft EIS). A history of land use in the Project Area is included in Section 1.3 (Background) and Section 3.5 (Land Use and Access). Potential effects to Native Hawaiian communities are discussed in Section 3.3 (Cultural Practices) and Section 3.6 (Socioeconomics) of the Draft EIS.	Public Health and Safety
82	Lana Bilbo		13	13. The cultural practices that we can't do because of the ongoing water diversion to the wetland need to be considered. This includes, not limited to, paddling canoes, in the wetland, working loi + harvesting from it, sustaining + being sustained bu the loko i'a, the impacts of removing that habitat for the native birds, nene, hula, oli, prayer, etc.	Detailed discussion of cultural resources and practices regarding water can be found in Section 3.3 (Cultural Practices) of the Draft EIS. Cumulative effects from other activities in the vicinity of the Project Area are discussed in Chapter 4 of the Draft EIS.	Cultural Practices, Biological Resources, Land Use and Access, Water Resources
82	Lana Bilbo		14	14. A clear explanation of the facilities on Niihau + their relationship to this project should be provided.	Section 1.5 of the Draft EIS describes the scope of analysis. Facilities and activities on Niʻihau are not within	Proposed Action

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
					the Project Area and so they are not within the scope of this EIS.	
82	Lana Bilbo		15	15. Should have independent 3rd party testing of all sites that have poison, toxic, polluting or contaminating materials or actions that are disclosed directly to the public w/o the Navy as intermediary.	Section 3.7 (Water Resources) of the Draft EIS describes current water monitoring procedures at PMRF and potential effects from the Proposed Action. Section 3.9 (Public Health and Safety) of the Draft EIS describes current practices and procedures in place to protect the public from activities in the project area, and potential effects from the Proposed Action.	Hazardous Materials, EIS Process
83	Sherri Cummings	Malama Anahola Kakoo Kaua	1	*Please address the needs of DHHL beneficiaries and have benefit consultation w/these associations of the Department of Hawaiian Homelands as well as the waitlist Association and NHOs that support the beneficiaries of the Federal Mandated Program 1920 Hawaiian Homes Commission Act.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Sections 3.6 (Socioeconomics) and 3.5 (Land Use and Access) of the Draft EIS include potential effects from the Proposed Action on local and Native Hawaiian communities. The Navy and NASA are presenting enhanced management measures (EMMs) under the action alternatives that propose additional property management protections for the ʻāina. EMMs are discussed in Chapter 5 and listed in Table 5.2-1 of the Draft EIS. Specifically, EMM-4 discusses the development and continuation of the One Kauaʻi Hui (Stakeholder Advisory Group) which seeks to establish regular communication channels to	Consultation, Socioeconomics, Land Use

Letter ID	Commenter Name	Organization	Comment Number	Original Public Scoping Comment[1]	EIS Team Response	Resource/ Section
					strengthen relationships with the Native Hawaiian community, and other interested stakeholders.	
83	Sherri Cummings	Malama Anahola Kakoo Kaua	2	*Speak to Native Hawaiian Niihau beneficiaries and have beneficiary consultation w/them as well.	Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Draft EIS describes the public review process in detail, including how the Navy and NASA solicited public participation during scoping. This outreach included a 40-day comment period (extended 10 days over the required minimum 30 days), personalized notification letters (174), and multiple consecutive newspaper and social media advertisements (also see Appendices G and L in the Draft EIS). A notification postcard was sent to a Niʻihau representative, and another will be sent following publication of the Draft EIS.	Consultation, Cultural Practices
84	Karen Ono	BLNR	1	Bird interaction or distraction @ Kokee.	On behalf of the Navy and NASA, the EIS team thanks you for your comment and appreciates your participation. Detailed discussion of avian wildlife within the Project Area can be found in Section 3.4 (Biological Resources) of the Draft EIS.	Biological Resources

Unedited Original Public Scoping Comments

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Scoping Comment Letter 0001

Consent for storing submitted data
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Comments

Even if an EIS is completed, the Hawai'i community across all islands have lost faith in the NAVY leadership specifically for their lack of transparency and how they have handled the Red Hill Fuel Spill on O'ahu. We don't want more detrimental enrivonmental impacts on other islands. Go away. The community wants the land agreement expire. Landback for our inidigenous host culture and the ongoing illegal occupation of the Hawaiian Kingdom.

Add Attachments (optional)

Submitted on
05/08/2024

Scoping Comment Letter 0002

Consent for storing submitted data
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Comments

Thank you for your service in protecting America. As a Kauai resident since 2019 I appreciate the contributions of this joint venture. Beyond the strategic mission, PMFR and NASA are the third largest employer on Kauai with over 1000 employees per public records, contribute to our national defense in ways I'm certain I will never know and provide community engagement with fireworks on July Forth. These are simplified and not all encompassing statements. I support ongoing leases for the joint strategic defense as currently established. I would encourage contributing further federal funds to repair roadways up Kokee, even past the NASA facility to Kalalau lookout, in a jesture to the community and tourist use. I also strongly support expanding active cell service across the Kokee State Park for safety and convenience. Fantastic that the entrance to your NASA facility has excellent service, but at my cabin lease or on most trails there is null...and as a well known local service oasis may be counterproductive to have frequent vehicles (I'm guilty) trolling around your entranceway just to check messages...or make emergency calls. In example: that unmarked road to the Makaha Ridge is pristine. Perhaps expanding that underlying situational readiness to the entire Kokee roadway is both generous and prudent. The number of civilians at any time in the Kokee Park would more reliably disperse up or down mountain in the event of enhanced military readiness with well maintained roadways.

Add Attachments (optional)

Submitted on
05/09/2024

Scoping Comment Letter 0003

Bill Zimmerman <zzest77@gmail.com> 5/10/2024 11:47 AM

continuation of military and NASA on Kauai

To info@pmrf-kpgo-eis.com

This should be a "no brainer" for anyone living on any Hawaii island:
With the very clear and continuing challenges by various Nations, SO similar to previous to the Pearl Harbor debacle, anyone, especially anyone on any Hawaii Island MUST recognize that those islands will be first and foremost in any and every aggressions by those bad actors wanting to harm USA; to think otherwise is to IGNORE the CLEAR History of the wonderful islands of Hawaii, as well as many other islands of the vast Pacific...
Love and Peace to all y'all,,,
VintageVNvet, now certifiably an antique far shore, but still remembering and still loving ALL the folx who were SO great and gracious to me in the Hawaiian places when I was there;;;

Scoping Comment Letter 0004

Consent for storing submitted data

True

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Spotts

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Comments

I appreciate this opportunity to provide scoping comments on this significant proposed action. At the outset, I believe that this and other federal planning and NEPA analysis processes should actively consider how the proposed action and alternatives may add to or help solve the climate and extinction crises. These overlapping crises pose an existential threat to humanity and the health of the biosphere. On the climate crisis, please review the attached IPPC report. This report summarizes the overwhelming international scientific consensus on the severity of the climate crisis and the urgent need to phase out the use and development of fossil fuels. On the extinction crisis, there are an increasing number of scientific reports on the rapid loss of biological diversity and how this loss undermines the stability, resilience, and productivity of the ecosystems upon which life on Earth depends. Overall, this compelling science demonstrates the urgent need for bold and innovative solutions. Questions arise like: how can fossil fuel use be reduced and replaced by clean, renewable energy sources? How can any destruction, degradation, or fragmentation of wildlife habitat be avoided, reduced, or successfully mitigated? How could construction materials be sourced from sustainable producers and practices? How could the use of any toxic chemicals be replaced by safer alternatives? How could gains in energy and water conservation be achieved? How could any harmful invasive plants be prevented, controlled, reduced, or eradicated? Please consider these questions

in moving forward. On this specific proposed action, I am concerned about the many ESA listed plant and animal species in Hawaii and how this proposed action and alternatives may affect them. Hawaii is an epicenter for the extinction crisis. I hope this NEPA analysis will help identify the least damaging but feasible alternative to best advance the protection and recovery of those species. I also hope that any energy used will come from clean, renewable sources. Health is the ultimate wealth, and we all need a healthy environment. Thank you very much for your kind consideration of my comments and the attachment.

Add Attachments (optional)

climate_change_ipcc_2023_summary_report.pdf

Submitted on

5/11/2024

ipcc

INTERGOVERNMENTAL PANEL ON climate change

CLIMATE CHANGE 2023

Synthesis Report

Summary for Policymakers

A Report of the Intergovernmental Panel on Climate Change

CLIMATE CHANGE 2023

Synthesis Report

Summary for Policymakers

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"Fog opening the dawn" by Chung Jin Sil

The Weather and Climate Photography & Video Contest 2021, Korea Meteorological Administration
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THE INTERGOVERNMENTAL PANEL ON CLIMATE CHANGE

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Sources cited in this Synthesis Report

References for material contained in this report are given in curly brackets {} at the end of each paragraph.

In the Summary for Policymakers, the references refer to the numbers of the sections, figures, tables and boxes in the underlying Introduction and Topics of this Synthesis Report.

In the Introduction and Sections of the longer report, the references refer to the contributions of the Working Groups I, II and III (WGI, WGII, WGIII) to the Sixth Assessment Report and other IPCC Reports (in italicized curly brackets), or to other sections of the Synthesis Report itself (in round brackets).

The following abbreviations have been used:
SPM: Summary for Policymakers
TS: Technical Summary
ES: Executive Summary of a chapter
Numbers denote specific chapters and sections of a report.

Other IPCC reports cited in this Synthesis Report:
SR1.5: Global Warming of 1.5°C
SRCCL: Climate Change and Land
SROCC: The Ocean and Cryosphere in a Changing Climate

Summary for Policymakers

This Summary for Policymakers should be cited as:
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Introduction

This Synthesis Report (SYR) of the IPCC Sixth Assessment Report (AR6) summarises the state of knowledge of climate change, its widespread impacts and risks, and climate change mitigation and adaptation. It integrates the main findings of the Sixth Assessment Report (AR6) based on contributions from the three Working Groups[1], and the three Special Reports[2]. The summary for Policymakers (SPM) is structured in three parts: SPM.A Current Status and Trends, SPM.B Future Climate Change, Risks, and Long-Term Responses, and SPM.C Responses in the Near Term[3].

This report recognizes the interdependence of climate, ecosystems and biodiversity, and human societies; the value of diverse forms of knowledge; and the close linkages between climate change adaptation, mitigation, ecosystem health, human well-being and sustainable development, and reflects the increasing diversity of actors involved in climate action.

Based on scientific understanding, key findings can be formulated as statements of fact or associated with an assessed level of confidence using the IPCC calibrated language[4].

---

1 The three Working Group contributions to AR6 are: AR6 Climate Change 2021: The Physical Science Basis; AR6 Climate Change 2022: Impacts, Adaptation and Vulnerability; and AR6 Climate Change 2022: Mitigation of Climate Change. Their assessments cover scientific literature accepted for publication respectively by 31 January 2021, 1 September 2021 and 11 October 2021.

2 The three Special Reports are: Global Warming of 1.5°C (2018): an IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty (SR1.5); Climate Change and Land (2019): an IPCC Special Report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems (SRCCL); and The Ocean and Cryosphere in a Changing Climate (2019) (SROCC). The Special Reports cover scientific literature accepted for publication respectively by 15 May 2018, 7 April 2019 and 15 May 2019.

3 In this report, the near term is defined as the period until 2040. The long term is defined as the period beyond 2040.

4 Each finding is grounded in an evaluation of underlying evidence and agreement. The IPCC calibrated language uses five qualifiers to express a level of confidence: very low, low, medium, high and very high, and typeset in italics, for example, *medium confidence*. The following terms are used to indicate the assessed likelihood of an outcome or a result: virtually certain 99–100% probability, very likely 90–100%, likely 66–100%, more likely than not >50–100%, about as likely as not 33–66%, unlikely 0–33%, very unlikely 0–10%, exceptionally unlikely 0–1%. Additional terms (extremely likely 95–100%; and extremely unlikely 0–5%) are also used when appropriate. Assessed likelihood is typeset in italics, e.g., *very likely*. This is consistent with AR5 and the other AR6 Reports.

A. Current Status and Trends

Observed Warming and its Causes

A.1 Human activities, principally through emissions of greenhouse gases, have unequivocally caused global warming, with global surface temperature reaching 1.1°C above 1850-1900 in 2011-2020. Global greenhouse gas emissions have continued to increase, with unequal historical and ongoing contributions arising from unsustainable energy use, land use and land-use change, lifestyles and patterns of consumption and production across regions, between and within countries, and among individuals (*high confidence*). {*2.1, Figure 2.1, Figure 2.2*}

A.1.1 Global surface temperature was 1.09 [0.95 to 1.20]°C[5] higher in 2011–2020 than 1850–1900[6], with larger increases over land (1.59 [1.34 to 1.83]°C) than over the ocean (0.88 [0.68 to 1.01]°C). Global surface temperature in the first two decades of the 21st century (2001–2020) was 0.99 [0.84 to 1.10]°C higher than 1850–1900. Global surface temperature has increased faster since 1970 than in any other 50-year period over at least the last 2000 years (*high confidence*). {*2.1.1*, *Figure 2.1*}

A.1.2 The *likely* range of total human-caused global surface temperature increase from 1850–1900 to 2010–2019[7] is 0.8°C to 1.3°C, with a best estimate of 1.07°C. Over this period, it is *likely* that well-mixed greenhouse gases (GHGs) contributed a warming of 1.0°C to 2.0°C[8], and other human drivers (principally aerosols) contributed a cooling of 0.0°C to 0.8°C, natural (solar and volcanic) drivers changed global surface temperature by –0.1°C to +0.1°C, and internal variability changed it by –0.2°C to +0.2°C. {*2.1.1*, *Figure 2.1*}

A.1.3 Observed increases in well-mixed GHG concentrations since around 1750 are unequivocally caused by GHG emissions from human activities over this period. Historical cumulative net CO_2 emissions from 1850 to 2019 were 2400 ± 240 $GtCO_2$ of which more than half (58%) occurred between 1850 and 1989, and about 42% occurred between 1990 and 2019 (*high confidence*). In 2019, atmospheric CO_2 concentrations (410 parts per million) were higher than at any time in at least 2 million years (*high confidence*), and concentrations of methane (1866 parts per billion) and nitrous oxide (332 parts per billion) were higher than at any time in at least 800,000 years (*very high confidence*). {*2.1.1*, *Figure 2.1*}

A.1.4 Global net anthropogenic GHG emissions have been estimated to be 59 ± 6.6 $GtCO_2$-eq[9] in 2019, about 12% (6.5 $GtCO_2$-eq) higher than in 2010 and 54% (21 $GtCO_2$-eq) higher than in 1990, with the largest share and growth in gross GHG emissions occurring in CO_2 from fossil fuels combustion and industrial processes (CO_2-FFI) followed by methane, whereas the highest relative growth occurred in fluorinated gases (F-gases), starting from low levels in 1990. Average annual GHG emissions during 2010–2019 were higher than in any previous decade on record, while the rate of growth between 2010 and 2019 (1.3% yr^{-1}) was lower than that between 2000 and 2009 (2.1% yr^{-1}). In 2019, approximately 79% of global GHG

[5] Ranges given throughout the SPM represent *very likely* ranges (5–95% range) unless otherwise stated.

[6] The estimated increase in global surface temperature since AR5 is principally due to further warming since 2003–2012 (0.19 [0.16 to 0.22] °C). Additionally, methodological advances and new datasets have provided a more complete spatial representation of changes in surface temperature, including in the Arctic. These and other improvements have also increased the estimate of global surface temperature change by approximately 0.1°C, but this increase does not represent additional physical warming since AR5.

[7] The period distinction with A.1.1 arises because the attribution studies consider this slightly earlier period. The observed warming to 2010–2019 is 1.06 [0.88 to 1.21]°C.

[8] Contributions from emissions to the 2010–2019 warming relative to 1850–1900 assessed from radiative forcing studies are: CO_2 0.8 [0.5 to 1.2]°C; methane 0.5 [0.3 to 0.8]°C; nitrous oxide 0.1 [0.0 to 0.2]°C and fluorinated gases 0.1 [0.0 to 0.2]°C. {*2.1.1*}

[9] GHG emission metrics are used to express emissions of different greenhouse gases in a common unit. Aggregated GHG emissions in this report are stated in CO_2-equivalents (CO_2-eq) using the Global Warming Potential with a time horizon of 100 years (GWP100) with values based on the contribution of Working Group I to the AR6. The AR6 WGI and WGIII reports contain updated emission metric values, evaluations of different metrics with regard to mitigation objectives, and assess new approaches to aggregating gases. The choice of metric depends on the purpose of the analysis and all GHG emission metrics have limitations and uncertainties, given that they simplify the complexity of the physical climate system and its response to past and future GHG emissions. {*2.1.1*}

emissions came from the sectors of energy, industry, transport, and buildings together and 22%[10] from agriculture, forestry and other land use (AFOLU). Emissions reductions in CO_2-FFI due to improvements in energy intensity of GDP and carbon intensity of energy, have been less than emissions increases from rising global activity levels in industry, energy supply, transport, agriculture and buildings. (*high confidence*) {*2.1.1*}

A.1.5 Historical contributions of CO_2 emissions vary substantially across regions in terms of total magnitude, but also in terms of contributions to CO_2-FFI and net CO_2 emissions from land use, land-use change and forestry (CO_2-LULUCF). In 2019, around 35% of the global population live in countries emitting more than 9 tCO_2-eq per capita[11] (excluding CO_2-LULUCF) while 41% live in countries emitting less than 3 tCO_2-eq per capita; of the latter a substantial share lacks access to modern energy services. Least Developed Countries (LDCs) and Small Island Developing States (SIDS) have much lower per capita emissions (1.7 tCO_2-eq and 4.6 tCO_2-eq, respectively) than the global average (6.9 tCO_2-eq), excluding CO_2-LULUCF. The 10% of households with the highest per capita emissions contribute 34–45% of global consumption-based household GHG emissions, while the bottom 50% contribute 13–15%. (*high confidence*) {*2.1.1, Figure 2.2*}

Observed Changes and Impacts

A.2 Widespread and rapid changes in the atmosphere, ocean, cryosphere and biosphere have occurred. Human-caused climate change is already affecting many weather and climate extremes in every region across the globe. This has led to widespread adverse impacts and related losses and damages to nature and people (*high confidence*). Vulnerable communities who have historically contributed the least to current climate change are disproportionately affected (*high confidence*). {*2.1, Table 2.1, Figure 2.2, Figure 2.3*} (*Figure SPM.1*)

A.2.1 It is unequivocal that human influence has warmed the atmosphere, ocean and land. Global mean sea level increased by 0.20 [0.15 to 0.25] m between 1901 and 2018. The average rate of sea level rise was 1.3 [0.6 to 2.1] mm yr^{-1} between 1901 and 1971, increasing to 1.9 [0.8 to 2.9] mm yr^{-1} between 1971 and 2006, and further increasing to 3.7 [3.2 to 4.2] mm yr^{-1} between 2006 and 2018 (*high confidence*). Human influence was *very likely* the main driver of these increases since at least 1971. Evidence of observed changes in extremes such as heatwaves, heavy precipitation, droughts, and tropical cyclones, and, in particular, their attribution to human influence, has further strengthened since AR5. Human influence has *likely* increased the chance of compound extreme events since the 1950s, including increases in the frequency of concurrent heatwaves and droughts (*high confidence*). {*2.1.2, Table 2.1, Figure 2.3, Figure 3.4*} (*Figure SPM.1*)

A.2.2 Approximately 3.3 to 3.6 billion people live in contexts that are highly vulnerable to climate change. Human and ecosystem vulnerability are interdependent. Regions and people with considerable development constraints have high vulnerability to climatic hazards. Increasing weather and climate extreme events have exposed millions of people to acute food insecurity[12] and reduced water security, with the largest adverse impacts observed in many locations and/or communities in Africa, Asia, Central and South America, LDCs, Small Islands and the Arctic, and globally for Indigenous Peoples, small-scale food producers and low-income households. Between 2010 and 2020, human mortality from floods, droughts and storms was 15 times higher in highly vulnerable regions, compared to regions with very low vulnerability. (*high confidence*) {*2.1.2, 4.4*} (*Figure SPM.1*)

A.2.3 Climate change has caused substantial damages, and increasingly irreversible losses, in terrestrial, freshwater, cryospheric, and coastal and open ocean ecosystems (*high confidence*). Hundreds of local losses of species have been driven by increases in the magnitude of heat extremes (*high confidence*) with mass mortality events recorded on land and in the ocean (*very high confidence*). Impacts on some ecosystems are approaching irreversibility such as the impacts of hydrological changes resulting from the retreat of glaciers, or the changes in some mountain (*medium confidence*) and Arctic ecosystems driven by permafrost thaw (*high confidence*). {*2.1.2, Figure 2.3*} (*Figure SPM.1*)

[10] GHG emission levels are rounded to two significant digits; as a consequence, small differences in sums due to rounding may occur. {*2.1.1*}

[11] Territorial emissions.

[12] Acute food insecurity can occur at any time with a severity that threatens lives, livelihoods or both, regardless of the causes, context or duration, as a result of shocks risking determinants of food security and nutrition, and is used to assess the need for humanitarian action. {*2.1*}

A.2.4 Climate change has reduced food security and affected water security, hindering efforts to meet Sustainable Development Goals (*high confidence*). Although overall agricultural productivity has increased, climate change has slowed this growth over the past 50 years globally (*medium confidence*), with related negative impacts mainly in mid- and low latitude regions but positive impacts in some high latitude regions (*high confidence*). Ocean warming and ocean acidification have adversely affected food production from fisheries and shellfish aquaculture in some oceanic regions *(high confidence)*. Roughly half of the world's population currently experience severe water scarcity for at least part of the year due to a combination of climatic and non-climatic drivers (*medium confidence*). {*2.1.2, Figure 2.3*} (*Figure SPM.1*)

A.2.5 In all regions increases in extreme heat events have resulted in human mortality and morbidity (*very high confidence*). The occurrence of climate-related food-borne and water-borne diseases (*very high confidence*) and the incidence of vector-borne diseases (*high confidence*) have increased. In assessed regions, some mental health challenges are associated with increasing temperatures (*high confidence*), trauma from extreme events (*very high confidence*), and loss of livelihoods and culture (*high confidence*). Climate and weather extremes are increasingly driving displacement in Africa, Asia, North America (*high confidence*), and Central and South America (*medium confidence*), with small island states in the Caribbean and South Pacific being disproportionately affected relative to their small population size (*high confidence*). {*2.1.2, Figure 2.3*} (*Figure SPM.1*)

A.2.6 Climate change has caused widespread adverse impacts and related losses and damages[13] to nature and people that are unequally distributed across systems, regions and sectors. Economic damages from climate change have been detected in climate-exposed sectors, such as agriculture, forestry, fishery, energy, and tourism. Individual livelihoods have been affected through, for example, destruction of homes and infrastructure, and loss of property and income, human health and food security, with adverse effects on gender and social equity. (*high confidence*) {*2.1.2*} (*Figure SPM.1*)

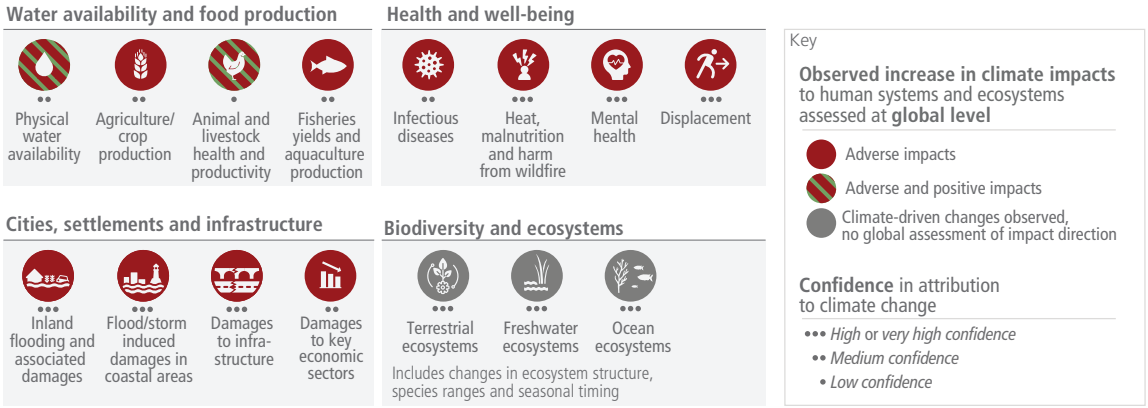
A.2.7 In urban areas, observed climate change has caused adverse impacts on human health, livelihoods and key infrastructure. Hot extremes have intensified in cities. Urban infrastructure, including transportation, water, sanitation and energy systems have been compromised by extreme and slow-onset events[14], with resulting economic losses, disruptions of services and negative impacts to well-being. Observed adverse impacts are concentrated amongst economically and socially marginalised urban residents. (*high confidence*) {*2.1.2*}

[13] In this report, the term 'losses and damages' refers to adverse observed impacts and/or projected risks and can be economic and/or non-economic (see Annex I: Glossary).

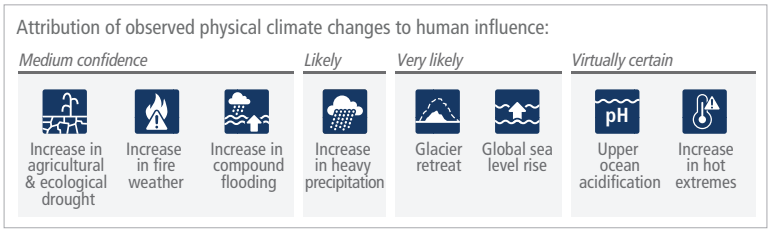
[14] Slow-onset events are described among the climatic-impact drivers of the AR6 WGI and refer to the risks and impacts associated with e.g., increasing temperature means, desertification, decreasing precipitation, loss of biodiversity, land and forest degradation, glacial retreat and related impacts, ocean acidification, sea level rise and salinization. {*2.1.2*}

Adverse impacts from human-caused climate change will continue to intensify

a) Observed widespread and substantial impacts and related losses and damages attributed to climate change



b) Impacts are driven by changes in multiple physical climate conditions, which are increasingly attributed to human influence



c) The extent to which current and future generations will experience a hotter and different world depends on choices now and in the near term

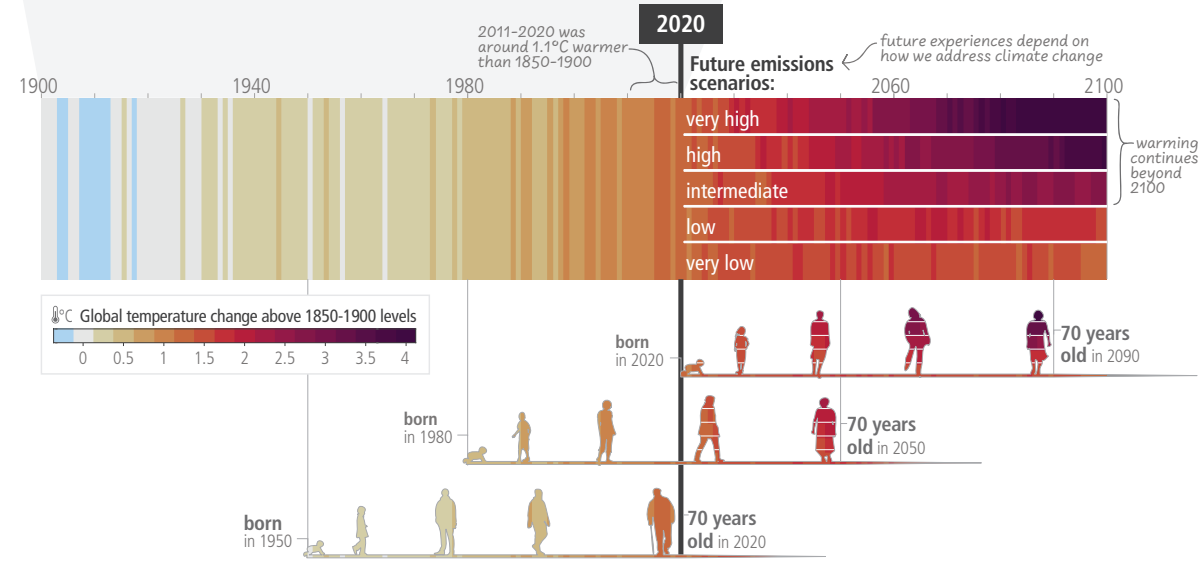


Figure SPM.1: (a) Climate change has already caused widespread impacts and related losses and damages on human systems and altered terrestrial, freshwater and ocean ecosystems worldwide. Physical water availability includes balance of water available from various sources including ground water, water quality and demand for water. Global mental health and displacement assessments reflect only assessed regions. Confidence levels reflect the assessment of attribution of the observed impact to climate change. **(b)** Observed impacts are connected to physical climate changes including many that have been attributed to human influence such as the selected climatic impact-drivers shown. Confidence and likelihood levels reflect the assessment of attribution of the observed climatic impact-driver to human influence. **(c)** Observed (1900–2020) and projected (2021–2100) changes in global surface temperature (relative to 1850-1900), which are linked to changes in climate conditions and impacts, illustrate how the climate has already changed and will change along the lifespan of three

representative generations (born in 1950, 1980 and 2020). Future projections (2021–2100) of changes in global surface temperature are shown for very low (SSP1-1.9), low (SSP1-2.6), intermediate (SSP2-4.5), high (SSP3-7.0) and very high (SSP5-8.5) GHG emissions scenarios. Changes in annual global surface temperatures are presented as 'climate stripes', with future projections showing the human-caused long-term trends and continuing modulation by natural variability (represented here using observed levels of past natural variability). Colours on the generational icons correspond to the global surface temperature stripes for each year, with segments on future icons differentiating possible future experiences. {*2.1, 2.1.2, Figure 2.1, Table 2.1, Figure 2.3, Cross-Section Box.2, 3.1, Figure 3.3, 4.1, 4.3*} (*Box SPM.1*)

Current Progress in Adaptation and Gaps and Challenges

A.3 Adaptation planning and implementation has progressed across all sectors and regions, with documented benefits and varying effectiveness. Despite progress, adaptation gaps exist, and will continue to grow at current rates of implementation. Hard and soft limits to adaptation have been reached in some ecosystems and regions. Maladaptation is happening in some sectors and regions. Current global financial flows for adaptation are insufficient for, and constrain implementation of, adaptation options, especially in developing countries (*high confidence*). {*2.2, 2.3*}

A.3.1 Progress in adaptation planning and implementation has been observed across all sectors and regions, generating multiple benefits (*very high confidence*). Growing public and political awareness of climate impacts and risks has resulted in at least 170 countries and many cities including adaptation in their climate policies and planning processes (*high confidence*). {*2.2.3*}

A.3.2 Effectiveness[15] of adaptation in reducing climate risks[16] is documented for specific contexts, sectors and regions (*high confidence*). Examples of effective adaptation options include: cultivar improvements, on-farm water management and storage, soil moisture conservation, irrigation, agroforestry, community-based adaptation, farm and landscape level diversification in agriculture, sustainable land management approaches, use of agroecological principles and practices and other approaches that work with natural processes (*high confidence*). Ecosystem-based adaptation[17] approaches such as urban greening, restoration of wetlands and upstream forest ecosystems have been effective in reducing flood risks and urban heat (*high confidence*). Combinations of non-structural measures like early warning systems and structural measures like levees have reduced loss of lives in case of inland flooding (*medium confidence*). Adaptation options such as disaster risk management, early warning systems, climate services and social safety nets have broad applicability across multiple sectors (*high confidence*). {*2.2.3*}

A.3.3 Most observed adaptation responses are fragmented, incremental[18], sector-specific and unequally distributed across regions. Despite progress, adaptation gaps exist across sectors and regions, and will continue to grow under current levels of implementation, with the largest adaptation gaps among lower income groups. (*high confidence*) {*2.3.2*}

A.3.4 There is increased evidence of maladaptation in various sectors and regions. Maladaptation especially affects marginalised and vulnerable groups adversely. (*high confidence*) {*2.3.2*}

A.3.5 Soft limits to adaptation are currently being experienced by small-scale farmers and households along some low-lying coastal areas (*medium confidence*) resulting from financial, governance, institutional and policy constraints (*high confidence*). Some tropical, coastal, polar and mountain ecosystems have reached hard adaptation limits (*high confidence*). Adaptation does not prevent all losses and damages, even with effective adaptation and before reaching soft and hard limits (*high confidence*). {*2.3.2*}

[15] Effectiveness refers here to the extent to which an adaptation option is anticipated or observed to reduce climate-related risk. {*2.2.3*}

[16] See Annex I: Glossary. {*2.2.3*}

[17] Ecosystem-based Adaptation (EbA) is recognized internationally under the Convention on Biological Diversity (CBD14/5). A related concept is Nature-based Solutions (NbS), see Annex I: Glossary.

[18] Incremental adaptations to change in climate are understood as extensions of actions and behaviours that already reduce the losses or enhance the benefits of natural variations in extreme weather/climate events. {*2.3.2*}

A.3.6 Key barriers to adaptation are limited resources, lack of private sector and citizen engagement, insufficient mobilization of finance (including for research), low climate literacy, lack of political commitment, limited research and/or slow and low uptake of adaptation science, and low sense of urgency. There are widening disparities between the estimated costs of adaptation and the finance allocated to adaptation (*high confidence*). Adaptation finance has come predominantly from public sources, and a small proportion of global tracked climate finance was targeted to adaptation and an overwhelming majority to mitigation (*very high confidence*). Although global tracked climate finance has shown an upward trend since AR5, current global financial flows for adaptation, including from public and private finance sources, are insufficient and constrain implementation of adaptation options, especially in developing countries (*high confidence*). Adverse climate impacts can reduce the availability of financial resources by incurring losses and damages and through impeding national economic growth, thereby further increasing financial constraints for adaptation, particularly for developing and least developed countries (*medium confidence*). {*2.3.2, 2.3.3*}

Box SPM.1 The use of scenarios and modelled pathways in the AR6 Synthesis Report

Modelled scenarios and pathways[19] are used to explore future emissions, climate change, related impacts and risks, and possible mitigation and adaptation strategies and are based on a range of assumptions, including socio-economic variables and mitigation options. These are quantitative projections and are neither predictions nor forecasts. Global modelled emission pathways, including those based on cost effective approaches contain regionally differentiated assumptions and outcomes, and have to be assessed with the careful recognition of these assumptions. Most do not make explicit assumptions about global equity, environmental justice or intra-regional income distribution. IPCC is neutral with regard to the assumptions underlying the scenarios in the literature assessed in this report, which do not cover all possible futures.[20] {*Cross-Section Box.2*}

WGI assessed the climate response to five illustrative scenarios based on Shared Socio-economic Pathways (SSPs)[21] that cover the range of possible future development of anthropogenic drivers of climate change found in the literature. High and very high GHG emissions scenarios (SSP3-7.0 and SSP5-8.5[22]) have CO_2 emissions that roughly double from current levels by 2100 and 2050, respectively. The intermediate GHG emissions scenario (SSP2-4.5) has CO_2 emissions remaining around current levels until the middle of the century. The very low and low GHG emissions scenarios (SSP1-1.9 and SSP1-2.6) have CO_2 emissions declining to net zero around 2050 and 2070, respectively, followed by varying levels of net negative CO_2 emissions. In addition, Representative Concentration Pathways (RCPs)[23] were used by WGI and WGII to assess regional climate changes, impacts and risks. In WGIII, a large number of global modelled emissions pathways were assessed, of which 1202 pathways were categorised based on their assessed global warming over the 21st century; categories range from pathways that limit warming to 1.5°C with more than 50% likelihood (noted >50% in this report) with no or limited overshoot (C1) to pathways that exceed 4°C (C8). {*Cross-Section Box.2*} (*Box SPM.1, Table 1*)

Global warming levels (GWLs) relative to 1850–1900 are used to integrate the assessment of climate change and related impacts and risks since patterns of changes for many variables at a given GWL are common to all scenarios considered and independent of timing when that level is reached. {*Cross-Section Box.2*}

[19] In the literature, the terms pathways and scenarios are used interchangeably, with the former more frequently used in relation to climate goals. WGI primarily used the term scenarios and WGIII mostly used the term modelled emission and mitigation pathways. The SYR primarily uses scenarios when referring to WGI and modelled emission and mitigation pathways when referring to WGIII.

[20] Around half of all modelled global emission pathways assume cost-effective approaches that rely on least-cost mitigation/abatement options globally. The other half looks at existing policies and regionally and sectorally differentiated actions.

[21] SSP-based scenarios are referred to as SSPx-y, where 'SSPx' refers to the Shared Socioeconomic Pathway describing the socioeconomic trends underlying the scenarios, and 'y' refers to the level of radiative forcing (in watts per square metre, or W m^{-2}) resulting from the scenario in the year 2100. {*Cross-Section Box.2*}

[22] Very high emissions scenarios have become *less likely* but cannot be ruled out. Warming levels >4°C may result from very high emissions scenarios, but can also occur from lower emission scenarios if climate sensitivity or carbon cycle feedbacks are higher than the best estimate. {*3.1.1*}

[23] RCP-based scenarios are referred to as RCPy, where 'y' refers to the level of radiative forcing (in watts per square metre, or W m^{-2}) resulting from the scenario in the year 2100. The SSP scenarios cover a broader range of greenhouse gas and air pollutant futures than the RCPs. They are similar but not identical, with differences in concentration trajectories. The overall effective radiative forcing tends to be higher for the SSPs compared to the RCPs with the same label (*medium confidence*). {*Cross-Section Box.2*}

Box SPM.1, Table 1: Description and relationship of scenarios and modelled pathways considered across AR6 Working Group reports. {*Cross-Section Box.2 Figure 1*}

Category in WGIII	Category description	GHG emissions scenarios (SSPx-y*) in WGI & WGII	RCPy** in WGI & WGII
C1	limit warming to 1.5°C (>50%) with no or limited overshoot***	Very low (SSP1-1.9)	
C2	return warming to 1.5°C (>50%) after a high overshoot***		
C3	limit warming to 2°C (>67%)	Low (SSP1-2.6)	RCP2.6
C4	limit warming to 2°C (>50%)		
C5	limit warming to 2.5°C (>50%)		
C6	limit warming to 3°C (>50%)	Intermediate (SSP2-4.5)	RCP 4.5
C7	limit warming to 4°C (>50%)	High (SSP3-7.0)	
C8	exceed warming of 4°C (>50%)	Very high (SSP5-8.5)	RCP 8.5

* See footnote 21 for the SSPx-y terminology.

** See footnote 23 for the RCPy terminology.

*** Limited overshoot refers to exceeding 1.5°C global warming by up to about 0.1°C, high overshoot by 0.1°C-0.3°C, in both cases for up to several decades.

Current Mitigation Progress, Gaps and Challenges

A.4 Policies and laws addressing mitigation have consistently expanded since AR5. Global GHG emissions in 2030 implied by nationally determined contributions (NDCs) announced by October 2021 make it *likely* that warming will exceed 1.5°C during the 21st century and make it harder to limit warming below 2°C. There are gaps between projected emissions from implemented policies and those from NDCs and finance flows fall short of the levels needed to meet climate goals across all sectors and regions. (*high confidence*) {*2.2, 2.3, Figure 2.5, Table 2.2*}

A.4.1 The UNFCCC, Kyoto Protocol, and the Paris Agreement are supporting rising levels of national ambition. The Paris Agreement, adopted under the UNFCCC, with near universal participation, has led to policy development and target-setting at national and sub-national levels, in particular in relation to mitigation, as well as enhanced transparency of climate action and support (*medium confidence*). Many regulatory and economic instruments have already been deployed successfully (*high confidence*). In many countries, policies have enhanced energy efficiency, reduced rates of deforestation and accelerated technology deployment, leading to avoided and in some cases reduced or removed emissions (*high confidence*). Multiple lines of evidence suggest that mitigation policies have led to several[24] Gt CO_2-eq yr^{-1} of avoided global emissions (*medium confidence*). At least 18 countries have sustained absolute production-based GHG and consumption-based CO_2 reductions[25] for longer than 10 years. These reductions have only partly offset global emissions growth (*high confidence*). {*2.2.1, 2.2.2*}

A.4.2 Several mitigation options, notably solar energy, wind energy, electrification of urban systems, urban green infrastructure, energy efficiency, demand-side management, improved forest and crop/grassland management, and reduced food waste and loss, are technically viable, are becoming increasingly cost effective and are generally supported by the

[24] At least 1.8 $GtCO_2$-eq yr^{-1} can be accounted for by aggregating separate estimates for the effects of economic and regulatory instruments. Growing numbers of laws and executive orders have impacted global emissions and were estimated to result in 5.9 $GtCO_2$-eq yr^{-1} less emissions in 2016 than they otherwise would have been. (*medium confidence*) {*2.2.2*}

[25] Reductions were linked to energy supply decarbonisation, energy efficiency gains, and energy demand reduction, which resulted from both policies and changes in economic structure (*high confidence*). {*2.2.2*}

public. From 2010 to 2019 there have been sustained decreases in the unit costs of solar energy (85%), wind energy (55%), and lithium-ion batteries (85%), and large increases in their deployment, e.g., >10× for solar and >100× for electric vehicles (EVs), varying widely across regions. The mix of policy instruments that reduced costs and stimulated adoption includes public R&D, funding for demonstration and pilot projects, and demand-pull instruments such as deployment subsidies to attain scale. Maintaining emission-intensive systems may, in some regions and sectors, be more expensive than transitioning to low emission systems. (*high confidence*) {*2.2.2, Figure 2.4*}

A.4.3 A substantial 'emissions gap' exists between global GHG emissions in 2030 associated with the implementation of NDCs announced prior to COP26[26] and those associated with modelled mitigation pathways that limit warming to 1.5°C (>50%) with no or limited overshoot or limit warming to 2°C (>67%) assuming immediate action (*high confidence*). This would make it *likely* that warming will exceed 1.5°C during the 21st century (*high confidence*). Global modelled mitigation pathways that limit warming to 1.5°C (>50%) with no or limited overshoot or limit warming to 2°C (>67%) assuming immediate action imply deep global GHG emissions reductions this decade (*high confidence*) (see SPM Box 1, Table 1, B.6)[27]. Modelled pathways that are consistent with NDCs announced prior to COP26 until 2030 and assume no increase in ambition thereafter have higher emissions, leading to a median global warming of 2.8 [2.1 to 3.4] °C by 2100 (*medium confidence*). Many countries have signalled an intention to achieve net zero GHG or net zero CO_2 by around mid-century but pledges differ across countries in terms of scope and specificity, and limited policies are to date in place to deliver on them. {*2.3.1, Table 2.2, Figure 2.5, Table 3.1, 4.1*}

A.4.4 Policy coverage is uneven across sectors (*high confidence*). Policies implemented by the end of 2020 are projected to result in higher global GHG emissions in 2030 than emissions implied by NDCs, indicating an 'implementation gap' (*high confidence*). Without a strengthening of policies, global warming of 3.2 [2.2 to 3.5] °C is projected by 2100 (*medium confidence*). {*2.2.2, 2.3.1, 3.1.1, Figure 2.5*} (*Box SPM.1, Figure SPM.5*)

A.4.5 The adoption of low-emission technologies lags in most developing countries, particularly least developed ones, due in part to limited finance, technology development and transfer, and capacity (*medium confidence*). The magnitude of climate finance flows has increased over the last decade and financing channels have broadened but growth has slowed since 2018 (*high confidence*). Financial flows have developed heterogeneously across regions and sectors (*high confidence*). Public and private finance flows for fossil fuels are still greater than those for climate adaptation and mitigation (*high confidence*). The overwhelming majority of tracked climate finance is directed towards mitigation, but nevertheless falls short of the levels needed to limit warming to below 2°C or to 1.5°C across all sectors and regions (see C7.2) (*very high confidence*). In 2018, public and publicly mobilised private climate finance flows from developed to developing countries were below the collective goal under the UNFCCC and Paris Agreement to mobilise USD 100 billion per year by 2020 in the context of meaningful mitigation action and transparency on implementation (*medium confidence*). {*2.2.2, 2.3.1, 2.3.3*}

[26] Due to the literature cutoff date of WGIII, the additional NDCs submitted after 11 October 2021 are not assessed here. {*Footnote 32 in the Longer Report*}

[27] Projected 2030 GHG emissions are 50 (47–55) $GtCO_2$-eq if all conditional NDC elements are taken into account. Without conditional elements, the global emissions are projected to be approximately similar to modelled 2019 levels at 53 (50–57) $GtCO_2$-eq. {*2.3.1, Table 2.2*}

B. Future Climate Change, Risks, and Long-Term Responses

Future Climate Change

B.1 Continued greenhouse gas emissions will lead to increasing global warming, with the best estimate of reaching 1.5°C in the near term in considered scenarios and modelled pathways. Every increment of global warming will intensify multiple and concurrent hazards (*high confidence*). Deep, rapid, and sustained reductions in greenhouse gas emissions would lead to a discernible slowdown in global warming within around two decades, and also to discernible changes in atmospheric composition within a few years (*high confidence*). {*Cross-Section Boxes 1 and 2, 3.1, 3.3, Table 3.1, Figure 3.1, 4.3*} (*Figure SPM.2, Box SPM.1*)

B.1.1 Global warming[28] will continue to increase in the near term (2021–2040) mainly due to increased cumulative CO_2 emissions in nearly all considered scenarios and modelled pathways. In the near term, global warming *is more likely than not* to reach 1.5°C even under the very low GHG emission scenario (SSP1-1.9) and *likely* or *very likely* to exceed 1.5°C under higher emissions scenarios. In the considered scenarios and modelled pathways, the best estimates of the time when the level of global warming of 1.5°C is reached lie in the near term[29]. Global warming declines back to below 1.5°C by the end of the 21st century in some scenarios and modelled pathways (see B.7). The assessed climate response to GHG emissions scenarios results in a best estimate of warming for 2081–2100 that spans a range from 1.4°C for a very low GHG emissions scenario (SSP1-1.9) to 2.7°C for an intermediate GHG emissions scenario (SSP2-4.5) and 4.4°C for a very high GHG emissions scenario (SSP5-8.5)[30], with narrower uncertainty ranges[31] than for corresponding scenarios in AR5. {*Cross-Section Boxes 1 and 2, 3.1.1, 3.3.4, Table 3.1, 4.3*} (*Box SPM.1*)

B.1.2 Discernible differences in trends of global surface temperature between contrasting GHG emissions scenarios (SSP1-1.9 and SSP1-2.6 vs. SSP3-7.0 and SSP5-8.5) would begin to emerge from natural variability[32] within around 20 years. Under these contrasting scenarios, discernible effects would emerge within years for GHG concentrations, and sooner for air quality improvements, due to the combined targeted air pollution controls and strong and sustained methane emissions reductions. Targeted reductions of air pollutant emissions lead to more rapid improvements in air quality within years compared to reductions in GHG emissions only, but in the long term, further improvements are projected in scenarios that combine efforts to reduce air pollutants as well as GHG emissions[33]. (*high confidence*) {*3.1.1*} (*Box SPM.1*)

B.1.3 Continued emissions will further affect all major climate system components. With every additional increment of global warming, changes in extremes continue to become larger. Continued global warming is projected to further intensify the global water cycle, including its variability, global monsoon precipitation, and very wet and very dry weather and

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[28] Global warming (see Annex I: Glossary) is here reported as running 20-year averages, unless stated otherwise, relative to 1850–1900. Global surface temperature in any single year can vary above or below the long-term human-caused trend, due to natural variability. The internal variability of global surface temperature in a single year is estimated to be about ±0.25°C (5–95% range, *high confidence*). The occurrence of individual years with global surface temperature change above a certain level does not imply that this global warming level has been reached. {*4.3, Cross-Section Box.2*}

[29] Median five-year interval at which a 1.5°C global warming level is reached (50% probability) in categories of modelled pathways considered in WGIII is 2030–2035. By 2030, global surface temperature in any individual year could exceed 1.5°C relative to 1850–1900 with a probability between 40% and 60%, across the five scenarios assessed in WGI (*medium confidence*). In all scenarios considered in WGI except the very high emissions scenario (SSP5-8.5), the midpoint of the first 20-year running average period during which the assessed average global surface temperature change reaches 1.5°C lies in the first half of the 2030s. In the very high GHG emissions scenario, the midpoint is in the late 2020s. {*3.1.1, 3.3.1, 4.3*} (*Box SPM.1*)

[30] The best estimates [and *very likely* ranges] for the different scenarios are: 1.4 [1.0 to 1.8]°C (SSP1-1.9); 1.8 [1.3 to 2.4]°C (SSP1-2.6); 2.7 [2.1 to 3.5]°C (SSP2-4.5); 3.6 [2.8 to 4.6]°C (SSP3-7.0); and 4.4 [3.3 to 5.7]°C (SSP5-8.5). {*3.1.1*} (*Box SPM.1*)

[31] Assessed future changes in global surface temperature have been constructed, for the first time, by combining multi-model projections with observational constraints and the assessed equilibrium climate sensitivity and transient climate response. The uncertainty range is narrower than in the AR5 thanks to improved knowledge of climate processes, paleoclimate evidence and model-based emergent constraints. {*3.1.1*}

[32] See Annex I: Glossary. Natural variability includes natural drivers and internal variability. The main internal variability phenomena include El Niño-Southern Oscillation, Pacific Decadal Variability and Atlantic Multi-decadal Variability. {*4.3*}

[33] Based on additional scenarios.

climate events and seasons (*high confidence*). In scenarios with increasing CO_2 emissions, natural land and ocean carbon sinks are projected to take up a decreasing proportion of these emissions (*high confidence*). Other projected changes include further reduced extents and/or volumes of almost all cryospheric elements[34] (*high confidence*), further global mean sea level rise (*virtually certain*), and increased ocean acidification (*virtually certain*) and deoxygenation (*high confidence*). {*3.1.1*, *3.3.1*, *Figure 3.4*} (*Figure SPM.2*)

B.1.4 With further warming, every region is projected to increasingly experience concurrent and multiple changes in climatic impact-drivers. Compound heatwaves and droughts are projected to become more frequent, including concurrent events across multiple locations (*high confidence*). Due to relative sea level rise, current 1-in-100 year extreme sea level events are projected to occur at least annually in more than half of all tide gauge locations by 2100 under all considered scenarios (*high confidence*). Other projected regional changes include intensification of tropical cyclones and/or extratropical storms (*medium confidence*), and increases in aridity and fire weather *(medium* to *high confidence*). {*3.1.1*, *3.1.3*}

B.1.5 Natural variability will continue to modulate human-caused climate changes, either attenuating or amplifying projected changes, with little effect on centennial-scale global warming (*high confidence*). These modulations are important to consider in adaptation planning, especially at the regional scale and in the near term. If a large explosive volcanic eruption were to occur[35], it would temporarily and partially mask human-caused climate change by reducing global surface temperature and precipitation for one to three years (*medium confidence*). {*4.3*}

[34] Permafrost, seasonal snow cover, glaciers, the Greenland and Antarctic Ice Sheets, and Arctic sea ice.

[35] Based on 2500-year reconstructions, eruptions with a radiative forcing more negative than –1 W m^{-2}, related to the radiative effect of volcanic stratospheric aerosols in the literature assessed in this report, occur on average twice per century. {*4.3*}

With every increment of global warming, regional changes in mean climate and extremes become more widespread and pronounced

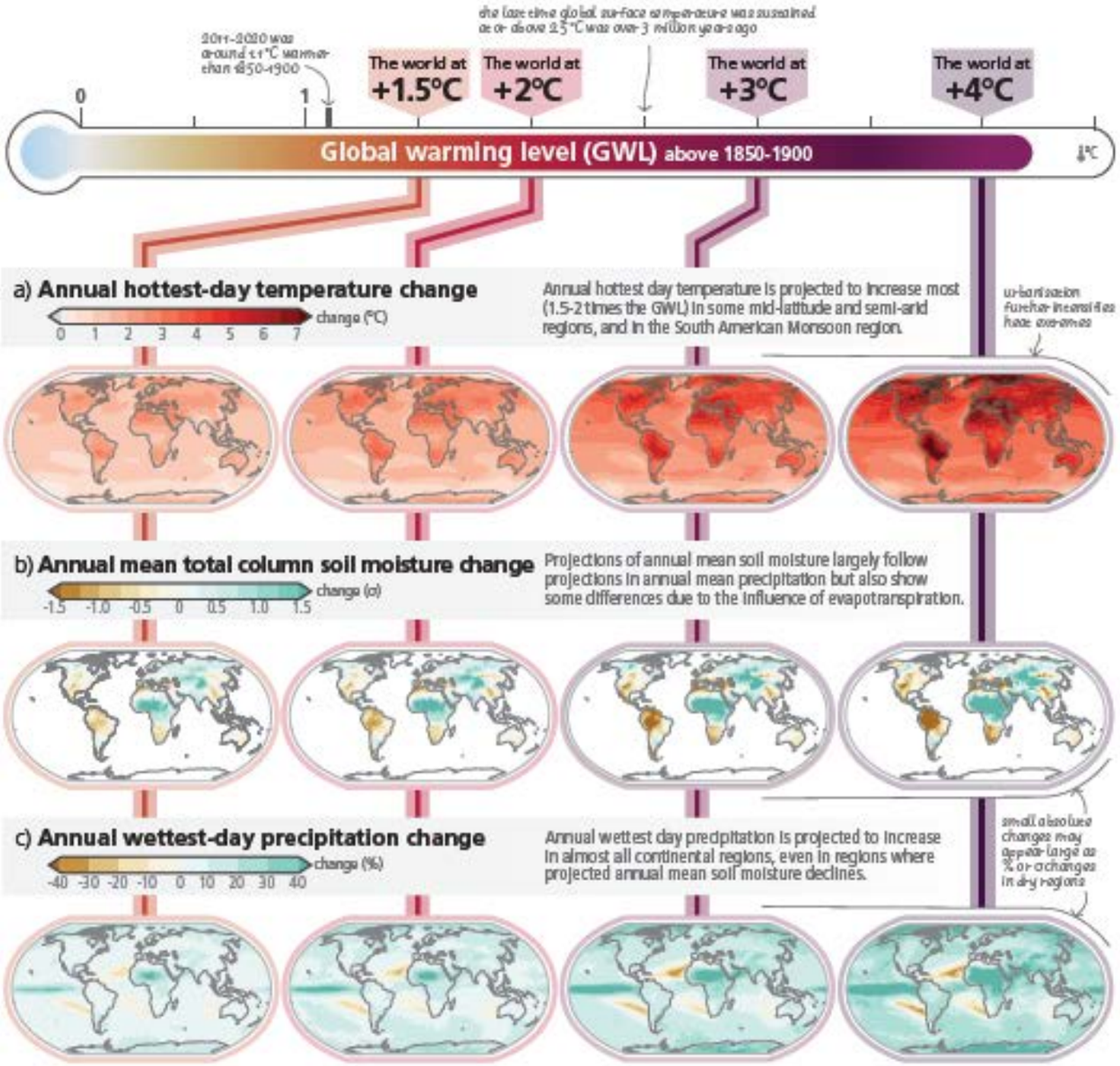


Figure SPM.2: Projected changes of annual maximum daily maximum temperature, annual mean total column soil moisture and annual maximum 1-day precipitation at global warming levels of 1.5°C, 2°C, 3°C, and 4°C relative to 1850–1900. Projected **(a)** annual maximum daily temperature change (°C), **(b)** annual mean total column soil moisture change (standard deviation), **(c)** annual maximum 1-day precipitation change (%). The panels show CMIP6 multi-model median changes. In panels (b) and (c), large positive relative changes in dry regions may correspond to small absolute changes. In panel (b), the unit is the standard deviation of interannual variability in soil moisture during 1850–1900. Standard deviation is a widely used metric in characterising drought severity. A projected reduction in mean soil moisture by one standard deviation corresponds to soil moisture conditions typical of droughts that occurred about once every six years during 1850–1900. The WGI Interactive Atlas (https://interactive-atlas.ipcc.ch/) can be used to explore additional changes in the climate system across the range of global warming levels presented in this figure. (*Figure 3.1, Cross-Section Box 2*)

Climate Change Impacts and Climate-Related Risks

B.2 For any given future warming level, many climate-related risks are higher than assessed in AR5, and projected long-term impacts are up to multiple times higher than currently observed (*high confidence*). Risks and projected adverse impacts and related losses and damages from climate change escalate with every increment of global warming (*very high confidence*). Climatic and non-climatic risks will increasingly interact, creating compound and cascading risks that are more complex and difficult to manage (*high confidence*). {*Cross-Section Box.2, 3.1, 4.3, Figure 3.3, Figure 4.3*} (*Figure SPM.3, Figure SPM.4*)

B.2.1 In the near term, every region in the world is projected to face further increases in climate hazards (*medium* to *high confidence*, depending on region and hazard), increasing multiple risks to ecosystems and humans (*very high confidence*). Hazards and associated risks expected in the near term include an increase in heat-related human mortality and morbidity (*high confidence*), food-borne, water-borne, and vector-borne diseases (*high confidence*), and mental health challenges[36] (*very high confidence*), flooding in coastal and other low-lying cities and regions (*high confidence*), biodiversity loss in land, freshwater and ocean ecosystems (*medium* to *very high confidence*, depending on ecosystem), and a decrease in food production in some regions (*high confidence*). Cryosphere-related changes in floods, landslides, and water availability have the potential to lead to severe consequences for people, infrastructure and the economy in most mountain regions (*high confidence*). The projected increase in frequency and intensity of heavy precipitation (*high confidence*) will increase rain-generated local flooding (*medium confidence*). {*Figure 3.2, Figure 3.3, 4.3, Figure 4.3*} (*Figure SPM.3, Figure SPM.4*)

B.2.2 Risks and projected adverse impacts and related losses and damages from climate change will escalate with every increment of global warming (*very high confidence*). They are higher for global warming of 1.5°C than at present, and even higher at 2°C (*high confidence*). Compared to the AR5, global aggregated risk levels[37] (Reasons for Concern[38]) are assessed to become high to very high at lower levels of global warming due to recent evidence of observed impacts, improved process understanding, and new knowledge on exposure and vulnerability of human and natural systems, including limits to adaptation (*high confidence*). Due to unavoidable sea level rise (see also B.3), risks for coastal ecosystems, people and infrastructure will continue to increase beyond 2100 (*high confidence*). {*3.1.2, 3.1.3, Figure 3.4, Figure 4.3*} (*Figure SPM.3, Figure SPM.4*)

B.2.3 With further warming, climate change risks will become increasingly complex and more difficult to manage. Multiple climatic and non-climatic risk drivers will interact, resulting in compounding overall risk and risks cascading across sectors and regions. Climate-driven food insecurity and supply instability, for example, are projected to increase with increasing global warming, interacting with non-climatic risk drivers such as competition for land between urban expansion and food production, pandemics and conflict. (*high confidence*) {*3.1.2, 4.3, Figure 4.3*}

B.2.4 For any given warming level, the level of risk will also depend on trends in vulnerability and exposure of humans and ecosystems. Future exposure to climatic hazards is increasing globally due to socio-economic development trends including migration, growing inequality and urbanisation. Human vulnerability will concentrate in informal settlements and rapidly growing smaller settlements. In rural areas vulnerability will be heightened by high reliance on climate-sensitive livelihoods. Vulnerability of ecosystems will be strongly influenced by past, present, and future patterns of unsustainable consumption and production, increasing demographic pressures, and persistent unsustainable use and management of land, ocean, and water. Loss of ecosystems and their services has cascading and long-term impacts on people globally, especially for Indigenous Peoples and local communities who are directly dependent on ecosystems to meet basic needs. (*high confidence*) {*Cross-Section Box.2 Figure 1c, 3.1.2, 4.3*}

[36] In all assessed regions.

[37] Undetectable risk level indicates no associated impacts are detectable and attributable to climate change; moderate risk indicates associated impacts are both detectable and attributable to climate change with at least *medium confidence*, also accounting for the other specific criteria for key risks; high risk indicates severe and widespread impacts that are judged to be high on one or more criteria for assessing key risks; and very high risk level indicates very high risk of severe impacts and the presence of significant irreversibility or the persistence of climate-related hazards, combined with limited ability to adapt due to the nature of the hazard or impacts/risks. {*3.1.2*}

[38] The Reasons for Concern (RFC) framework communicates scientific understanding about accrual of risk for five broad categories. RFC1: Unique and threatened systems: ecological and human systems that have restricted geographic ranges constrained by climate-related conditions and have high endemism or other distinctive properties. RFC2: Extreme weather events: risks/impacts to human health, livelihoods, assets and ecosystems from extreme weather events. RFC3: Distribution of impacts: risks/impacts that disproportionately affect particular groups due to uneven distribution of physical climate change hazards, exposure or vulnerability. RFC4: Global aggregate impacts: impacts to socio-ecological systems that can be aggregated globally into a single metric. RFC5: Large-scale singular events: relatively large, abrupt and sometimes irreversible changes in systems caused by global warming. See also Annex I: Glossary. {*3.1.2, Cross-Section Box.2*}

Future climate change is projected to increase the severity of impacts across natural and human systems and will increase regional differences

Examples of impacts without additional adaptation

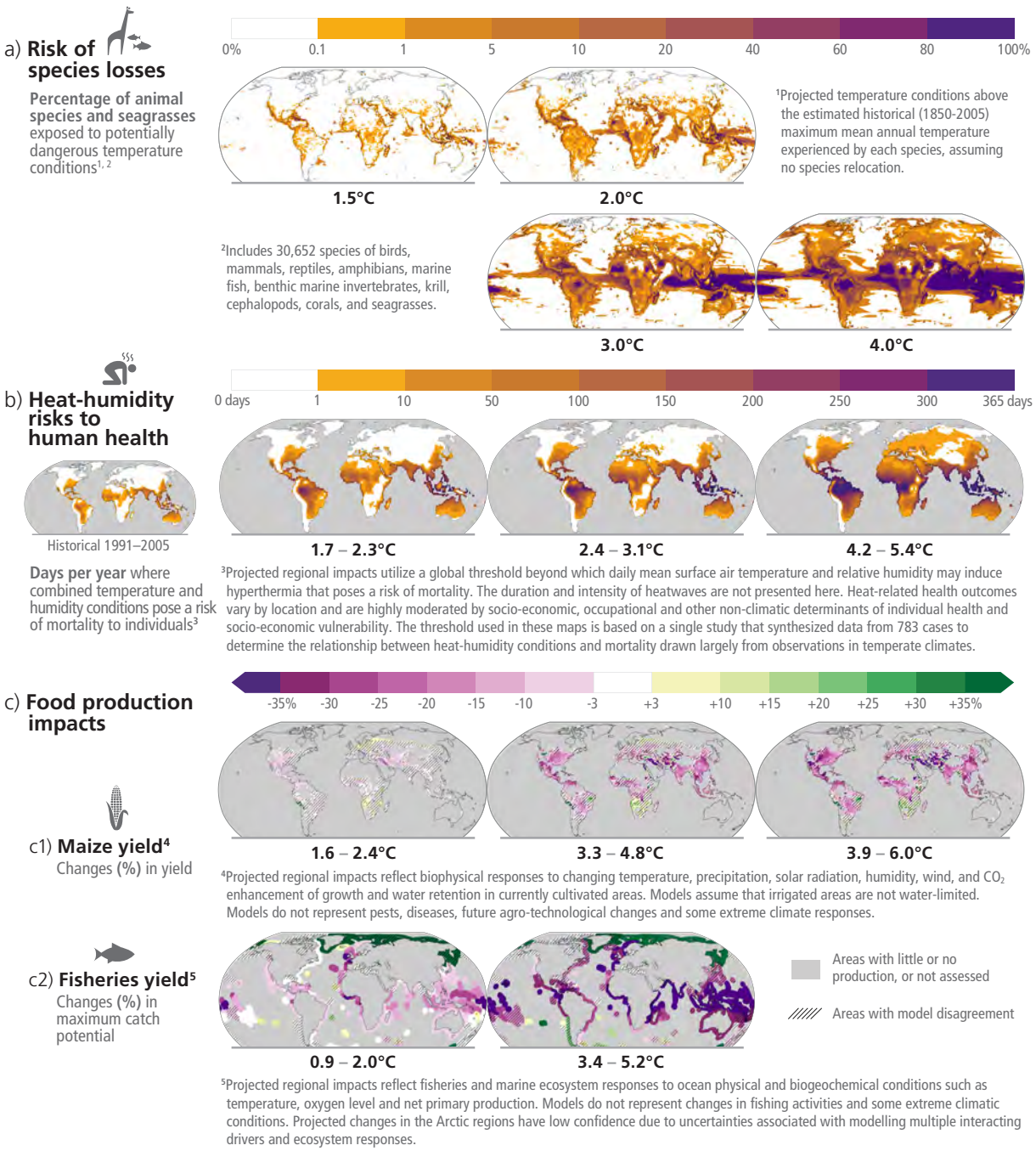
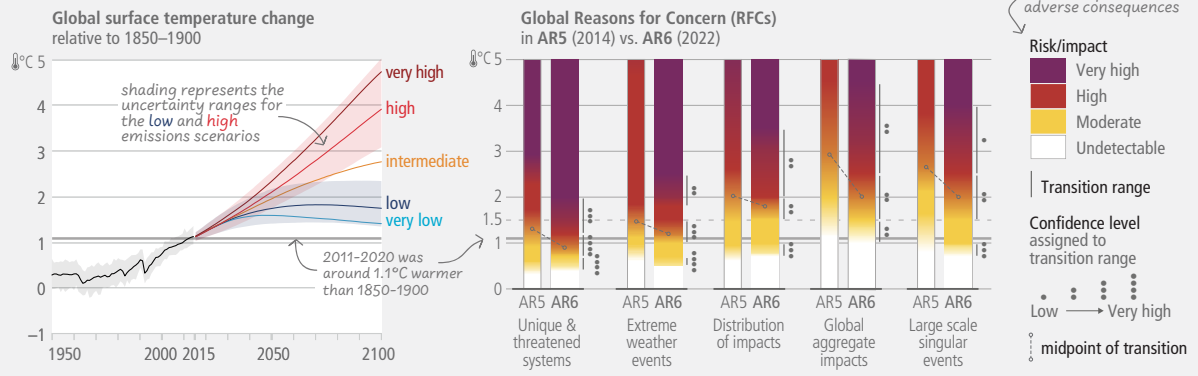


Figure SPM.3: Projected risks and impacts of climate change on natural and human systems at different global warming levels (GWLs) relative to 1850-1900 levels. Projected risks and impacts shown on the maps are based on outputs from different subsets of Earth system and impact models that were used to project each impact indicator without additional adaptation. WGII provides further assessment of the impacts on human and natural systems using these projections and additional lines of evidence. **(a)** Risks of species losses as indicated by the percentage of assessed species exposed to potentially dangerous temperature conditions, as defined by conditions beyond the estimated historical (1850–2005) maximum mean annual temperature experienced by each species, at GWLs of 1.5°C, 2°C, 3°C and 4°C. Underpinning projections of temperature are from 21 Earth system models and do not consider extreme events impacting ecosystems such as the Arctic. **(b)** Risks to human health as indicated by the days per year of population exposure to hyperthermic conditions that pose a risk of mortality from surface air temperature and humidity conditions for historical period (1991–2005) and at GWLs of 1.7°C–2.3°C (mean = 1.9°C; 13 climate models), 2.4°C–3.1°C (2.7°C; 16 climate models) and 4.2°C–5.4°C (4.7°C; 15 climate models). Interquartile ranges of GWLs by 2081–2100 under RCP2.6, RCP4.5 and RCP8.5. The presented index is consistent with common features found in many indices included within WGI and WGII assessments. **(c)** Impacts on food production: (c1) Changes in maize yield by 2080–2099 relative to 1986–2005 at projected GWLs of 1.6°C–2.4°C (2.0°C), 3.3°C–4.8°C (4.1°C) and 3.9°C–6.0°C (4.9°C). Median yield changes from an ensemble of 12 crop models, each driven by bias-adjusted outputs from 5 Earth system models, from the Agricultural Model Intercomparison and Improvement Project (AgMIP) and the Inter-Sectoral Impact Model Intercomparison Project (ISIMIP). Maps depict

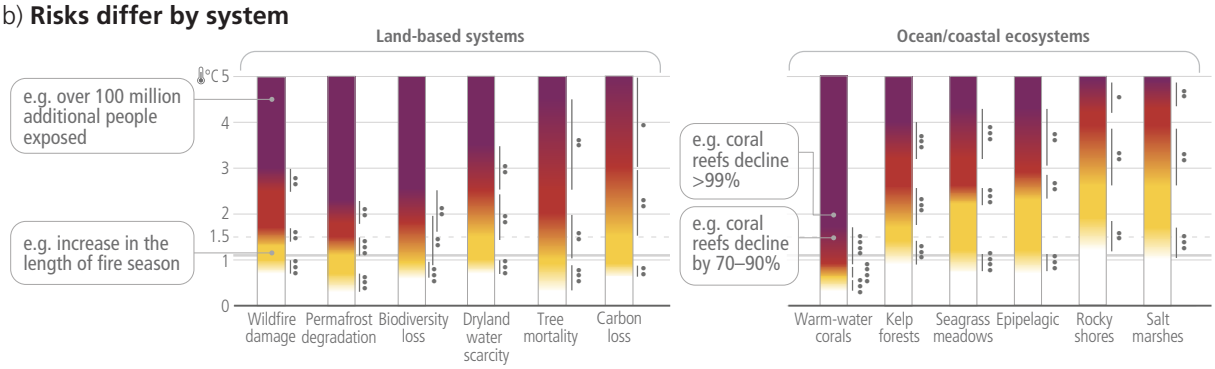
2080–2099 compared to 1986–2005 for current growing regions (>10 ha), with the corresponding range of future global warming levels shown under SSP1-2.6, SSP3-7.0 and SSP5-8.5, respectively. Hatching indicates areas where <70% of the climate-crop model combinations agree on the sign of impact. (c2) Change in maximum fisheries catch potential by 2081–2099 relative to 1986–2005 at projected GWLs of 0.9°C–2.0°C (1.5°C) and 3.4°C–5.2°C (4.3°C). GWLs by 2081–2100 under RCP2.6 and RCP8.5. Hatching indicates where the two climate-fisheries models disagree in the direction of change. Large relative changes in low yielding regions may correspond to small absolute changes. Biodiversity and fisheries in Antarctica were not analysed due to data limitations. Food security is also affected by crop and fishery failures not presented here. {*3.1.2, Figure 3.2, Cross-Section Box.2*} (*Box SPM.1*)

Risks are increasing with every increment of warming

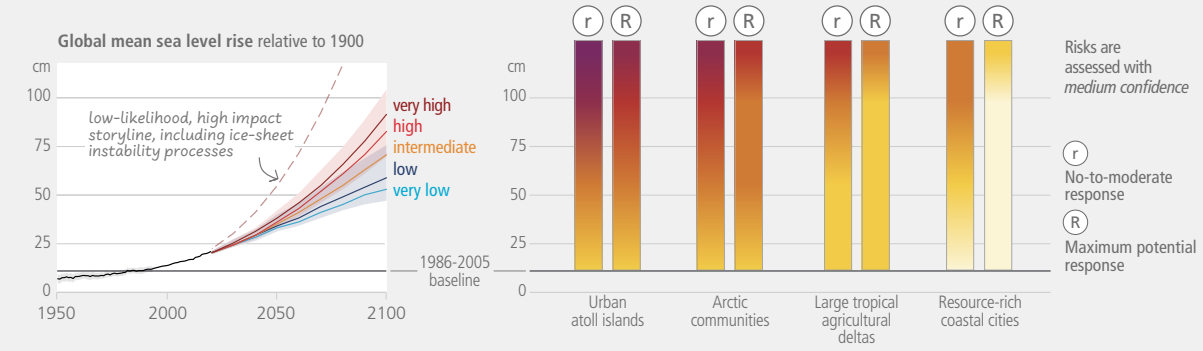
a) High risks are now assessed to occur at lower global warming levels



b) Risks differ by system

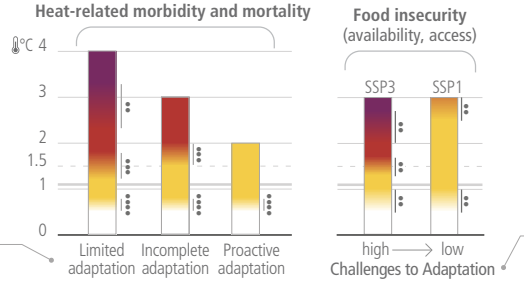


c) Risks to coastal geographies increase with sea level rise and depend on responses



d) Adaptation and socio-economic pathways affect levels of climate related risks

Limited adaptation (failure to proactively adapt; low investment in health systems); incomplete adaptation (incomplete adaptation planning; moderate investment in health systems); proactive adaptation (proactive adaptation management; higher investment in health systems)



The SSP1 pathway illustrates a world with low population growth, high income, and reduced inequalities, food produced in low GHG emission systems, effective land use regulation and high adaptive capacity (i.e., low challenges to adaptation). The SSP3 pathway has the opposite trends.

Figure SPM.4: Subset of assessed climate outcomes and associated global and regional climate risks. The burning embers result from a literature based expert elicitation. **Panel (a): Left** – Global surface temperature changes in °C relative to 1850–1900. These changes were obtained by combining CMIP6 model simulations with observational constraints based on past simulated warming, as well as an updated assessment of equilibrium climate sensitivity. *Very likely* ranges are shown for the low and high GHG emissions scenarios (SSP1-2.6 and SSP3-7.0) (Cross-Section Box.2). **Right** – Global Reasons for Concern (RFC), comparing AR6 (thick embers) and AR5 (thin embers) assessments. Risk transitions have generally shifted towards lower temperatures with updated scientific understanding. Diagrams are shown for each RFC, assuming low to no adaptation. Lines connect the midpoints of the transitions from moderate to high risk across AR5 and AR6. **Panel (b)**: Selected global risks for land and ocean ecosystems, illustrating general increase of risk with global warming levels with low to no adaptation. **Panel (c): Left** - Global mean sea level change in centimetres, relative to 1900. The historical changes (black) are observed by tide gauges before 1992 and altimeters afterwards. The future changes to 2100 (coloured lines and shading) are assessed consistently with observational constraints based on emulation of CMIP, ice-sheet, and glacier models, and *likely* ranges are shown for SSP1-2.6 and SSP3-7.0. **Right** - Assessment of the combined risk of coastal flooding, erosion and salinization for four illustrative coastal geographies in 2100, due to changing mean and extreme sea levels, under two response scenarios, with respect to the SROCC baseline period (1986–2005). The assessment does not account for changes in extreme sea level beyond those directly induced by mean sea level rise; risk levels could increase if other changes in extreme sea levels were considered (e.g., due to changes in cyclone intensity). "No-to-moderate response" describes efforts as of today (i.e., no further significant action or new types of actions). "Maximum potential response" represent a combination of responses implemented to their full extent and thus significant additional efforts compared to today, assuming minimal financial, social and political barriers. (In this context, 'today' refers to 2019.) The assessment criteria include exposure and vulnerability, coastal hazards, in-situ responses and planned relocation. Planned relocation refers to managed retreat or resettlements. The term response is used here instead of adaptation because some responses, such as retreat, may or may not be considered to be adaptation. **Panel (d)**: Selected risks under different socio-economic pathways, illustrating how development strategies and challenges to adaptation influence risk. **Left** - Heat-sensitive human health outcomes under three scenarios of adaptation effectiveness. The diagrams are truncated at the nearest whole °C within the range of temperature change in 2100 under three SSP scenarios. **Right** - Risks associated with food security due to climate change and patterns of socio-economic development. Risks to food security include availability and access to food, including population at risk of hunger, food price increases and increases in disability adjusted life years attributable to childhood underweight. Risks are assessed for two contrasted socio-economic pathways (SSP1 and SSP3) excluding the effects of targeted mitigation and adaptation policies. {*Figure 3.3*} (*Box SPM.1*)

Likelihood and Risks of Unavoidable, Irreversible or Abrupt Changes

B.3 Some future changes are unavoidable and/or irreversible but can be limited by deep, rapid, and sustained global greenhouse gas emissions reduction. The likelihood of abrupt and/or irreversible changes increases with higher global warming levels. Similarly, the probability of low-likelihood outcomes associated with potentially very large adverse impacts increases with higher global warming levels. (*high confidence*) {*3.1*}

B.3.1 Limiting global surface temperature does not prevent continued changes in climate system components that have multi-decadal or longer timescales of response (*high confidence*). Sea level rise is unavoidable for centuries to millennia due to continuing deep ocean warming and ice sheet melt, and sea levels will remain elevated for thousands of years (*high confidence*). However, deep, rapid, and sustained GHG emissions reductions would limit further sea level rise acceleration and projected long-term sea level rise commitment. Relative to 1995–2014, the *likely* global mean sea level rise under the SSP1-1.9 GHG emissions scenario is 0.15–0.23 m by 2050 and 0.28–0.55 m by 2100; while for the SSP5-8.5 GHG emissions scenario it is 0.20–0.29 m by 2050 and 0.63–1.01 m by 2100 (*medium confidence*). Over the next 2000 years, global mean sea level will rise by about 2–3 m if warming is limited to 1.5°C and 2–6 m if limited to 2°C (*low confidence*). {*3.1.3, Figure 3.4*} (*Box SPM.1*)

B.3.2 The likelihood and impacts of abrupt and/or irreversible changes in the climate system, including changes triggered when tipping points are reached, increase with further global warming (*high confidence*). As warming levels increase, so do the risks of species extinction or irreversible loss of biodiversity in ecosystems including forests (*medium confidence*), coral reefs (*very high confidence*) and in Arctic regions (*high confidence*). At sustained warming levels between 2°C and 3°C, the Greenland and West Antarctic ice sheets will be lost almost completely and irreversibly over multiple millennia, causing several metres of sea level rise *(limited evidence)*. The probability and rate of ice mass loss increase with higher global surface temperatures (*high confidence*). {*3.1.2, 3.1.3*}

B.3.3 The probability of low-likelihood outcomes associated with potentially very large impacts increases with higher global warming levels (*high confidence*). Due to deep uncertainty linked to ice-sheet processes, global mean sea level rise above the *likely* range – approaching 2 m by 2100 and in excess of 15 m by 2300 under the very high GHG emissions scenario (SSP5-8.5) (*low confidence*) – cannot be excluded. There is *medium confidence* that the Atlantic Meridional Overturning Circulation will not collapse abruptly before 2100, but if it were to occur, it would *very likely* cause abrupt shifts in regional weather patterns, and large impacts on ecosystems and human activities. {*3.1.3*} (*Box SPM.1*)

Adaptation Options and their Limits in a Warmer World

B.4 Adaptation options that are feasible and effective today will become constrained and less effective with increasing global warming. With increasing global warming, losses and damages will increase and additional human and natural systems will reach adaptation limits. Maladaptation can be avoided by flexible, multi-sectoral, inclusive, long-term planning and implementation of adaptation actions, with co-benefits to many sectors and systems. (*high confidence*) {*3.2, 4.1, 4.2, 4.3*}

B.4.1 The effectiveness of adaptation, including ecosystem-based and most water-related options, will decrease with increasing warming. The feasibility and effectiveness of options increase with integrated, multi-sectoral solutions that differentiate responses based on climate risk, cut across systems and address social inequities. As adaptation options often have long implementation times, long-term planning increases their efficiency. (*high confidence*) {*3.2, Figure 3.4, 4.1, 4.2*}

B.4.2 With additional global warming, limits to adaptation and losses and damages, strongly concentrated among vulnerable populations, will become increasingly difficult to avoid (*high confidence*). Above 1.5°C of global warming, limited freshwater resources pose potential hard adaptation limits for small islands and for regions dependent on glacier and snow melt (*medium confidence*). Above that level, ecosystems such as some warm-water coral reefs, coastal wetlands, rainforests, and polar and mountain ecosystems will have reached or surpassed hard adaptation limits and as a consequence, some Ecosystem-based Adaptation measures will also lose their effectiveness (*high confidence*). {*2.3.2, 3.2, 4.3*}

B.4.3 Actions that focus on sectors and risks in isolation and on short-term gains often lead to maladaptation over the long term, creating lock-ins of vulnerability, exposure and risks that are difficult to change. For example, seawalls effectively reduce impacts to people and assets in the short term but can also result in lock-ins and increase exposure to climate risks in the long term unless they are integrated into a long-term adaptive plan. Maladaptive responses can worsen existing inequities especially for Indigenous Peoples and marginalised groups and decrease ecosystem and biodiversity resilience. Maladaptation can be avoided by flexible, multi-sectoral, inclusive, long-term planning and implementation of adaptation actions, with co-benefits to many sectors and systems. (*high confidence*) {*2.3.2, 3.2*}

Carbon Budgets and Net Zero Emissions

B.5 Limiting human-caused global warming requires net zero CO_2 emissions. Cumulative carbon emissions until the time of reaching net zero CO_2 emissions and the level of greenhouse gas emission reductions this decade largely determine whether warming can be limited to 1.5°C or 2°C (*high confidence*). Projected CO_2 emissions from existing fossil fuel infrastructure without additional abatement would exceed the remaining carbon budget for 1.5°C (50%) (*high confidence*). {*2.3, 3.1, 3.3, Table 3.1*}

B.5.1 From a physical science perspective, limiting human-caused global warming to a specific level requires limiting cumulative CO_2 emissions, reaching at least net zero CO_2 emissions, along with strong reductions in other greenhouse gas emissions. Reaching net zero GHG emissions primarily requires deep reductions in CO_2, methane, and other GHG emissions, and implies net negative CO_2 emissions[39]. Carbon dioxide removal (CDR) will be necessary to achieve net negative CO_2 emissions (see B.6). Net zero GHG emissions, if sustained, are projected to result in a gradual decline in global surface temperatures after an earlier peak. (*high confidence*) {*3.1.1, 3.3.1, 3.3.2, 3.3.3, Table 3.1, Cross-Section Box.1}*

B.5.2 For every 1000 $GtCO_2$ emitted by human activity, global surface temperature rises by 0.45°C (best estimate, with a *likely* range from 0.27°C to 0.63°C). The best estimates of the remaining carbon budgets from the beginning of 2020 are 500 $GtCO_2$ for a 50% likelihood of limiting global warming to 1.5°C and 1150 $GtCO_2$ for a 67% likelihood of limiting warming to 2°C[40]. The stronger the reductions in non-CO_2 emissions, the lower the resulting temperatures are for a given remaining carbon budget or the larger remaining carbon budget for the same level of temperature change[41]. {*3.3.1*}

[39] Net zero GHG emissions defined by the 100-year global warming potential. See footnote 9.

[40] Global databases make different choices about which emissions and removals occurring on land are considered anthropogenic. Most countries report their anthropogenic land CO_2 fluxes including fluxes due to human-caused environmental change (e.g., CO_2 fertilisation) on 'managed' land in their national GHG inventories. Using emissions estimates based on these inventories, the remaining carbon budgets must be correspondingly reduced. {*3.3.1*}

[41] For example, remaining carbon budgets could be 300 or 600 $GtCO_2$ for 1.5°C (50%), respectively for high and low non-CO_2 emissions, compared to 500 $GtCO_2$ in the central case. {*3.3.1*}

B.5.3 If the annual CO_2 emissions between 2020–2030 stayed, on average, at the same level as 2019, the resulting cumulative emissions would almost exhaust the remaining carbon budget for 1.5°C (50%), and deplete more than a third of the remaining carbon budget for 2°C (67%). Estimates of future CO_2 emissions from existing fossil fuel infrastructures without additional abatement[42] already exceed the remaining carbon budget for limiting warming to 1.5°C (50%) (*high confidence*). Projected cumulative future CO_2 emissions over the lifetime of existing and planned fossil fuel infrastructure, if historical operating patterns are maintained and without additional abatement[43], are approximately equal to the remaining carbon budget for limiting warming to 2°C with a likelihood of 83%[44] (*high confidence*). {*2.3.1*, *3.3.1*, *Figure 3.5*}

B.5.4 Based on central estimates only, historical cumulative net CO_2 emissions between 1850 and 2019 amount to about four fifths[45] of the total carbon budget for a 50% probability of limiting global warming to 1.5°C (central estimate about 2900 $GtCO_2$), and to about two thirds[46] of the total carbon budget for a 67% probability to limit global warming to 2°C (central estimate about 3550 $GtCO_2$). {*3.3.1*, *Figure 3.5*}

Mitigation Pathways

B.6 All global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot, and those that limit warming to 2°C (>67%), involve rapid and deep and, in most cases, immediate greenhouse gas emissions reductions in all sectors this decade. Global net zero CO_2 emissions are reached for these pathway categories, in the early 2050s and around the early 2070s, respectively. (*high confidence*) {*3.3, 3.4, 4.1, 4.5, Table 3.1*} (*Figure SPM.5, Box SPM.1*)

B.6.1 Global modelled pathways provide information on limiting warming to different levels; these pathways, particularly their sectoral and regional aspects, depend on the assumptions described in Box SPM.1. Global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot or limit warming to 2°C (>67%) are characterized by deep, rapid, and, in most cases, immediate GHG emissions reductions. Pathways that limit warming to 1.5 °C (>50%) with no or limited overshoot reach net zero CO_2 in the early 2050s, followed by net negative CO_2 emissions. Those pathways that reach net zero GHG emissions do so around the 2070s. Pathways that limit warming to 2 °C (>67%) reach net zero CO_2 emissions in the early 2070s. Global GHG emissions are projected to peak between 2020 and at the latest before 2025 in global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot and in those that limit warming to 2°C (>67%) and assume immediate action. (*high confidence*) {*3.3.2*, *3.3.4*, *4.1*, *Table 3.1*, *Figure 3.6*} (*Table SPM.1*)

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[42] Abatement here refers to human interventions that reduce the amount of greenhouse gases that are released from fossil fuel infrastructure to the atmosphere.

[43] Ibid.

[44] WGI provides carbon budgets that are in line with limiting global warming to temperature limits with different likelihoods, such as 50%, 67% or 83%. {*3.3.1*}

[45] Uncertainties for total carbon budgets have not been assessed and could affect the specific calculated fractions.

[46] Ibid.

Table SPM.1: Greenhouse gas and CO_2 emission reductions from 2019, median and 5-95 percentiles. {*3.3.1, 4.1, Table 3.1, Figure 2.5, Box SPM.1*}

		Reductions from 2019 emission levels (%)			
		2030	2035	2040	2050
Limit warming to1.5°C (>50%) with no or limited overshoot	GHG	43 [34-60]	60 [49-77]	69 [58-90]	84 [73-98]
	CO_2	48 [36-69]	65 [50-96]	80 [61-109]	99 [79-119]
Limit warming to 2°C (>67%)	GHG	21 [1-42]	35 [22-55]	46 [34-63]	64 [53-77]
	CO_2	22 [1-44]	37 [21-59]	51 [36-70]	73 [55-90]

B.6.2 Reaching net zero CO_2 or GHG emissions primarily requires deep and rapid reductions in gross emissions of CO_2, as well as substantial reductions of non-CO_2 GHG emissions (*high confidence*). For example, in modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot, global methane emissions are reduced by 34 [21–57] % by 2030 relative to 2019. However, some hard-to-abate residual GHG emissions (e.g., some emissions from agriculture, aviation, shipping, and industrial processes) remain and would need to be counterbalanced by deployment of CDR methods to achieve net zero CO_2 or GHG emissions (*high confidence*). As a result, net zero CO_2 is reached earlier than net zero GHGs (*high confidence*). {*3.3.2, 3.3.3, Table 3.1, Figure 3.5*} (*Figure SPM.5*)

B.6.3 Global modelled mitigation pathways reaching net zero CO_2 and GHG emissions include transitioning from fossil fuels without carbon capture and storage (CCS) to very low- or zero-carbon energy sources, such as renewables or fossil fuels with CCS, demand-side measures and improving efficiency, reducing non-CO_2 GHG emissions, and CDR[47]. In most global modelled pathways, land-use change and forestry (via reforestation and reduced deforestation) and the energy supply sector reach net zero CO_2 emissions earlier than the buildings, industry and transport sectors. (*high confidence*) {*3.3.3, 4.1, 4.5, Figure 4.1*} (*Figure SPM.5, Box SPM.1*)

B.6.4 Mitigation options often have synergies with other aspects of sustainable development, but some options can also have trade-offs. There are potential synergies between sustainable development and, for instance, energy efficiency and renewable energy. Similarly, depending on the context[48], biological CDR methods like reforestation, improved forest management, soil carbon sequestration, peatland restoration and coastal blue carbon management can enhance biodiversity and ecosystem functions, employment and local livelihoods. However, afforestation or production of biomass crops can have adverse socio-economic and environmental impacts, including on biodiversity, food and water security, local livelihoods and the rights of Indigenous Peoples, especially if implemented at large scales and where land tenure is insecure. Modelled pathways that assume using resources more efficiently or that shift global development towards sustainability include fewer challenges, such as less dependence on CDR and pressure on land and biodiversity. (*high confidence*) {*3.4.1*}

[47] CCS is an option to reduce emissions from large-scale fossil-based energy and industry sources provided geological storage is available. When CO_2 is captured directly from the atmosphere (DACCS), or from biomass (BECCS), CCS provides the storage component of these CDR methods. CO_2 capture and subsurface injection is a mature technology for gas processing and enhanced oil recovery. In contrast to the oil and gas sector, CCS is less mature in the power sector, as well as in cement and chemicals production, where it is a critical mitigation option. The technical geological storage capacity is estimated to be on the order of 1000 $GtCO_2$, which is more than the CO_2 storage requirements through 2100 to limit global warming to 1.5°C, although the regional availability of geological storage could be a limiting factor. If the geological storage site is appropriately selected and managed, it is estimated that the CO_2 can be permanently isolated from the atmosphere. Implementation of CCS currently faces technological, economic, institutional, ecological-environmental and socio-cultural barriers. Currently, global rates of CCS deployment are far below those in modelled pathways limiting global warming to 1.5°C to 2°C. Enabling conditions such as policy instruments, greater public support and technological innovation could reduce these barriers. (*high confidence*) {*3.3.3*}

[48] The impacts, risks, and co-benefits of CDR deployment for ecosystems, biodiversity and people will be highly variable depending on the method, site-specific context, implementation and scale (*high confidence*).

Limiting warming to 1.5°C and 2°C involves rapid, deep and in most cases immediate greenhouse gas emission reductions

Net zero CO_2 and net zero GHG emissions can be achieved through strong reductions across all sectors

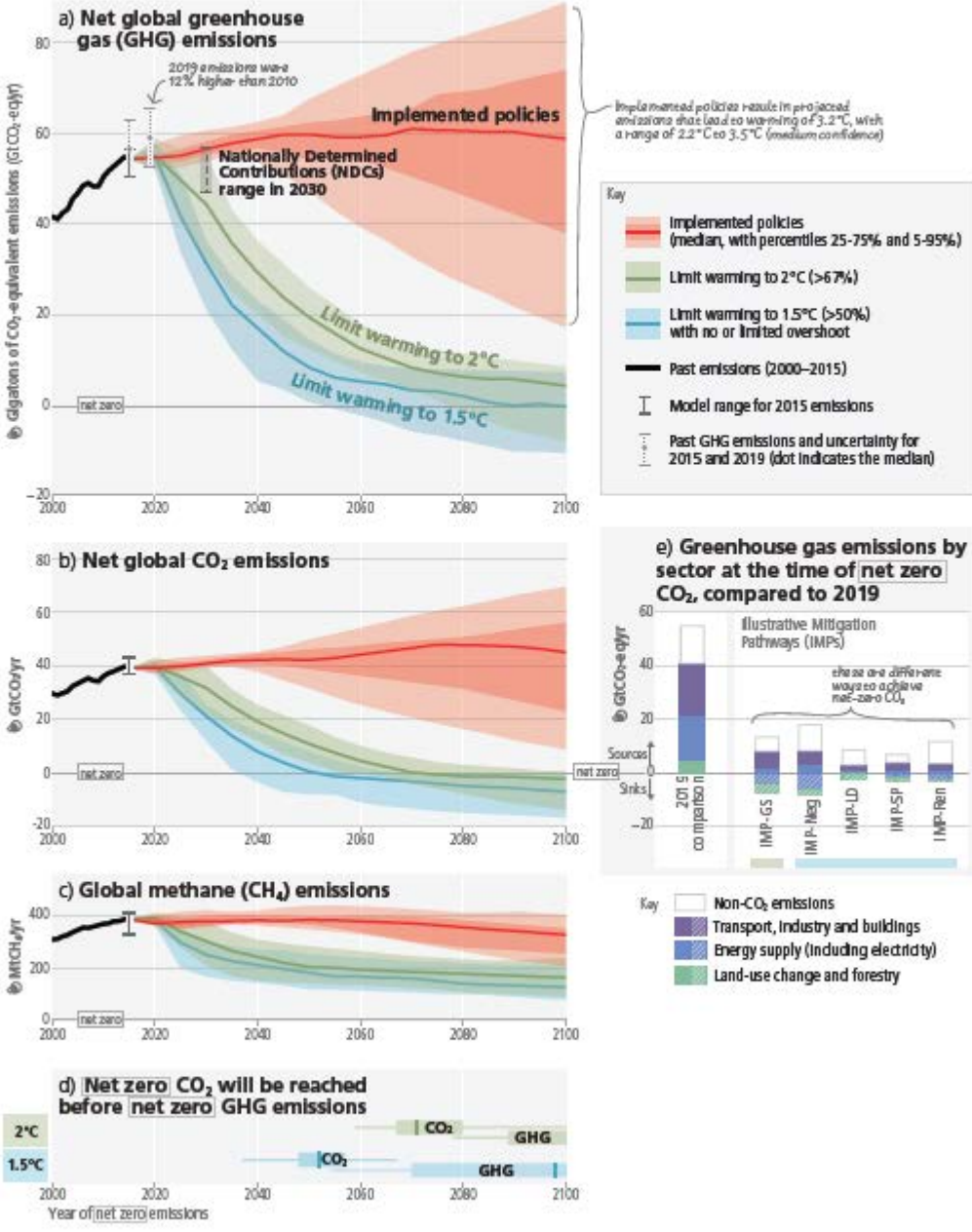


Figure SPM.5: Global emissions pathways consistent with implemented policies and mitigation strategies. Panels (a), (b) and **(c)** show the development of global GHG, CO_2 and methane emissions in modelled pathways, while **panel (d)** shows the associated timing of when GHG and CO_2 emissions reach net zero. Coloured ranges denote the 5th to 95th percentile across the global modelled pathways falling within a given category as described in Box SPM.1. The red ranges depict emissions pathways assuming policies that were implemented by the end of 2020. Ranges of modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot are shown in light blue (category C1) and pathways that limit warming to 2°C (>67%) are shown in green (category C3). Global emission pathways that would limit warming to 1.5°C (>50%) with no or limited overshoot and also reach net zero GHG in the second half of the century do so between 2070–2075. **Panel (e)** shows the sectoral contributions of CO_2 and non-CO_2 emissions sources and sinks at the time when net zero CO_2 emissions are reached in illustrative mitigation pathways (IMPs) consistent with limiting warming to 1.5°C with a high reliance on net negative emissions (IMP-Neg) ("high overshoot"), high resource efficiency (IMP-LD), a focus on sustainable development (IMP-SP), renewables (IMP-Ren) and limiting warming to 2°C with less rapid mitigation initially followed by a gradual strengthening (IMP-GS). Positive and negative emissions for different IMPs are compared to GHG emissions from the year 2019. Energy supply (including electricity) includes bioenergy with carbon dioxide capture and storage and direct air carbon dioxide capture and storage. CO_2 emissions from land-use change and forestry can only be shown as a net number as many models do not report emissions and sinks of this category separately. {*Figure 3.6, 4.1*} (*Box SPM.1*)

Overshoot: Exceeding a Warming Level and Returning

B.7 If warming exceeds a specified level such as 1.5°C, it could gradually be reduced again by achieving and sustaining net negative global CO_2 emissions. This would require additional deployment of carbon dioxide removal, compared to pathways without overshoot, leading to greater feasibility and sustainability concerns. Overshoot entails adverse impacts, some irreversible, and additional risks for human and natural systems, all growing with the magnitude and duration of overshoot. (*high confidence*) {*3.1, 3.3, 3.4, Table 3.1, Figure 3.6*}

B.7.1 Only a small number of the most ambitious global modelled pathways limit global warming to 1.5°C (>50%) by 2100 without exceeding this level temporarily. Achieving and sustaining net negative global CO_2 emissions, with annual rates of CDR greater than residual CO_2 emissions, would gradually reduce the warming level again (*high confidence*). Adverse impacts that occur during this period of overshoot and cause additional warming via feedback mechanisms, such as increased wildfires, mass mortality of trees, drying of peatlands, and permafrost thawing, weakening natural land carbon sinks and increasing releases of GHGs would make the return more challenging (*medium confidence*). {*3.3.2, 3.3.4, Table 3.1, Figure 3.6*} (*Box SPM.1*)

B.7.2 The higher the magnitude and the longer the duration of overshoot, the more ecosystems and societies are exposed to greater and more widespread changes in climatic impact-drivers, increasing risks for many natural and human systems. Compared to pathways without overshoot, societies would face higher risks to infrastructure, low-lying coastal settlements, and associated livelihoods. Overshooting 1.5°C will result in irreversible adverse impacts on certain ecosystems with low resilience, such as polar, mountain, and coastal ecosystems, impacted by ice-sheet melt, glacier melt, or by accelerating and higher committed sea level rise. (*high confidence*) {*3.1.2, 3.3.4*}

B.7.3 The larger the overshoot, the more net negative CO_2 emissions would be needed to return to 1.5°C by 2100. Transitioning towards net zero CO_2 emissions faster and reducing non-CO_2 emissions such as methane more rapidly would limit peak warming levels and reduce the requirement for net negative CO_2 emissions, thereby reducing feasibility and sustainability concerns, and social and environmental risks associated with CDR deployment at large scales. (*high confidence*) {*3.3.3, 3.3.4, 3.4.1, Table 3.1*}

C. Responses in the Near Term

Urgency of Near-Term Integrated Climate Action

C.1 Climate change is a threat to human well-being and planetary health (*very high confidence*). There is a rapidly closing window of opportunity to secure a liveable and sustainable future for all (*very high confidence*). Climate resilient development integrates adaptation and mitigation to advance sustainable development for all, and is enabled by increased international cooperation including improved access to adequate financial resources, particularly for vulnerable regions, sectors and groups, and inclusive governance and coordinated policies (*high confidence*). The choices and actions implemented in this decade will have impacts now and for thousands of years (*high confidence*). {*3.1, 3.3, 4.1, 4.2, 4.3, 4.4, 4.7, 4.8, 4.9, Figure 3.1, Figure 3.3, Figure 4.2*} (*Figure SPM.1, Figure SPM.6*)

C.1.1 Evidence of observed adverse impacts and related losses and damages, projected risks, levels and trends in vulnerability and adaptation limits, demonstrate that worldwide climate resilient development action is more urgent than previously assessed in AR5. Climate resilient development integrates adaptation and GHG mitigation to advance sustainable development for all. Climate resilient development pathways have been constrained by past development, emissions and climate change and are progressively constrained by every increment of warming, in particular beyond 1.5°C. (*very high confidence*) {*3.4, 3.4.2, 4.1*}

C.1.2 Government actions at sub-national, national and international levels, with civil society and the private sector, play a crucial role in enabling and accelerating shifts in development pathways towards sustainability and climate resilient development (*very high confidence*). Climate resilient development is enabled when governments, civil society and the private sector make inclusive development choices that prioritize risk reduction, equity and justice, and when decision-making processes, finance and actions are integrated across governance levels, sectors, and timeframes (*very high confidence*). Enabling conditions are differentiated by national, regional and local circumstances and geographies, according to capabilities, and include: political commitment and follow-through, coordinated policies, social and international cooperation, ecosystem stewardship, inclusive governance, knowledge diversity, technological innovation, monitoring and evaluation, and improved access to adequate financial resources, especially for vulnerable regions, sectors and communities (*high confidence*). {*3.4, 4.2, 4.4, 4.5, 4.7, 4.8*} (*Figure SPM.6*)

C.1.3 Continued emissions will further affect all major climate system components, and many changes will be irreversible on centennial to millennial time scales and become larger with increasing global warming. Without urgent, effective, and equitable mitigation and adaptation actions, climate change increasingly threatens ecosystems, biodiversity, and the livelihoods, health and well-being of current and future generations. (*high confidence*) {*3.1.3, 3.3.3, 3.4.1, Figure 3.4, 4.1, 4.2, 4.3, 4.4*} (*Figure SPM.1, Figure SPM.6*)

There is a rapidly narrowing window of opportunity to enable climate resilient development

Multiple interacting choices and actions can shift development pathways towards sustainability

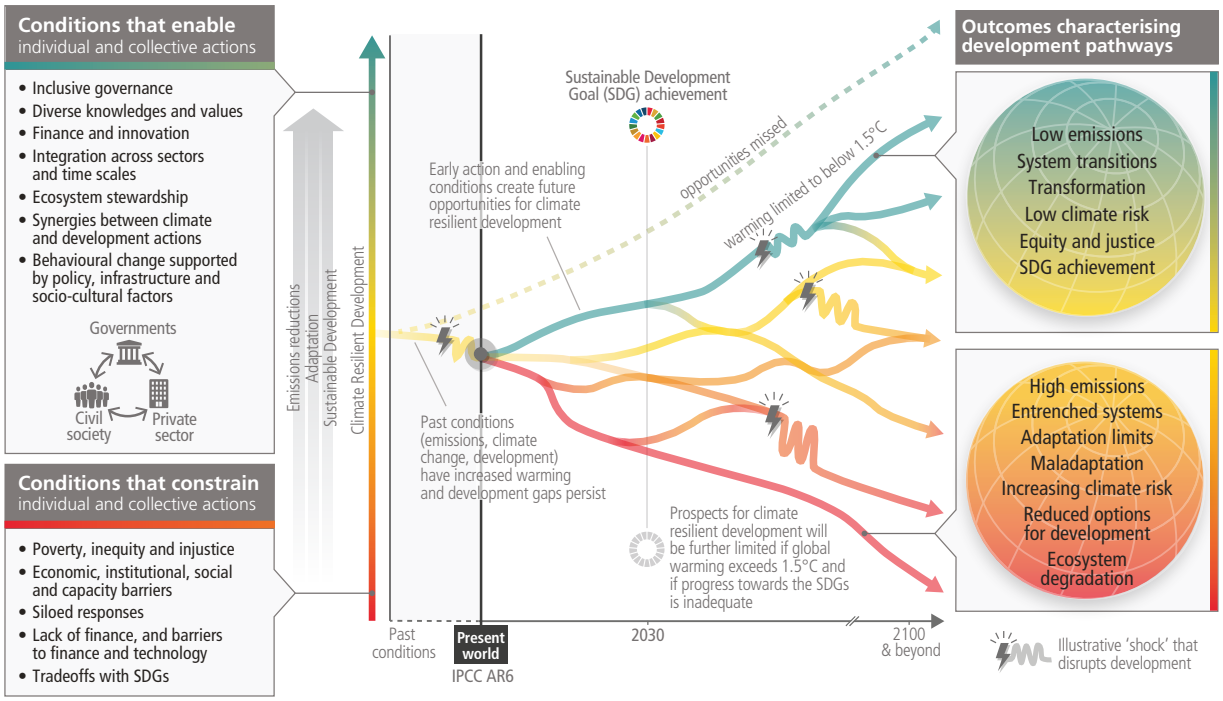


Figure SPM.6: The illustrative development pathways (red to green) and associated outcomes (right panel) show that there is a rapidly narrowing window of opportunity to secure a liveable and sustainable future for all. Climate resilient development is the process of implementing greenhouse gas mitigation and adaptation measures to support sustainable development. Diverging pathways illustrate that interacting choices and actions made by diverse government, private sector and civil society actors can advance climate resilient development, shift pathways towards sustainability, and enable lower emissions and adaptation. Diverse knowledge and values include cultural values, Indigenous Knowledge, local knowledge, and scientific knowledge. Climatic and non-climatic events, such as droughts, floods or pandemics, pose more severe shocks to pathways with lower climate resilient development (red to yellow) than to pathways with higher climate resilient development (green). There are limits to adaptation and adaptive capacity for some human and natural systems at global warming of 1.5°C, and with every increment of warming, losses and damages will increase. The development pathways taken by countries at all stages of economic development impact GHG emissions and mitigation challenges and opportunities, which vary across countries and regions. Pathways and opportunities for action are shaped by previous actions (or inactions and opportunities missed; dashed pathway) and enabling and constraining conditions (left panel), and take place in the context of climate risks, adaptation limits and development gaps. The longer emissions reductions are delayed, the fewer effective adaptation options. {*Figure 4.2, 3.1, 3.2, 3.4, 4.2, 4.4, 4.5, 4.6, 4.9*}

The Benefits of Near-Term Action

C.2 Deep, rapid, and sustained mitigation and accelerated implementation of adaptation actions in this decade would reduce projected losses and damages for humans and ecosystems (*very high confidence*), and deliver many co-benefits, especially for air quality and health (*high confidence*). Delayed mitigation and adaptation action would lock in high-emissions infrastructure, raise risks of stranded assets and cost-escalation, reduce feasibility, and increase losses and damages (*high confidence*). Near-term actions involve high up-front investments and potentially disruptive changes that can be lessened by a range of enabling policies (*high confidence*). {*2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 4.1, 4.2, 4.3, 4.4, 4.5, 4.6, 4.7, 4.8*}

C.2.1 Deep, rapid, and sustained mitigation and accelerated implementation of adaptation actions in this decade would reduce future losses and damages related to climate change for humans and ecosystems (*very high confidence*). As adaptation options often have long implementation times, accelerated implementation of adaptation in this decade is important to close adaptation gaps (*high confidence*). Comprehensive, effective, and innovative responses integrating adaptation and mitigation can harness synergies and reduce trade-offs between adaptation and mitigation (*high confidence*). {*4.1, 4.2, 4.3*}

C.2.2 Delayed mitigation action will further increase global warming and losses and damages will rise and additional human and natural systems will reach adaptation limits. Challenges from delayed adaptation and mitigation actions include the risk of cost escalation, lock-in of infrastructure, stranded assets, and reduced feasibility and effectiveness of adaptation and mitigation options. Without rapid, deep and sustained mitigation and accelerated adaptation actions, losses and damages will continue to increase, including projected adverse impacts in Africa, LDCs, SIDS, Central and South America[49], Asia and the Arctic, and will disproportionately affect the most vulnerable populations. *(high confidence*) {*2.1.2, 3.1.2, 3.2, 3.3.1, 3.3.3, 4.1, 4.2, 4.3*} (*Figure SPM.3, Figure SPM.4*)

C.2.3 Accelerated climate action can also provide co-benefits (see also C.4) (*high confidence*). Many mitigation actions would have benefits for health through lower air pollution, active mobility (e.g., walking, cycling), and shifts to sustainable healthy diets (*high confidence*). Strong, rapid and sustained reductions in methane emissions can limit near-term warming and improve air quality by reducing global surface ozone (*high confidence*). Adaptation can generate multiple additional benefits such as improving agricultural productivity, innovation, health and well-being, food security, livelihood, and biodiversity conservation (*very high confidence*). {*4.2, 4.5.4, 4.5.5, 4.6*}

C.2.4 Cost-benefit analysis remains limited in its ability to represent all avoided damages from climate change (*high confidence*). The economic benefits for human health from air quality improvement arising from mitigation action can be of the same order of magnitude as mitigation costs, and potentially even larger (*medium confidence*). Even without accounting for all the benefits of avoiding potential damages, the global economic and social benefit of limiting global warming to 2°C exceeds the cost of mitigation in most of the assessed literature (*medium confidence*)[50]. More rapid climate change mitigation, with emissions peaking earlier, increases co-benefits and reduces feasibility risks and costs in the long-term, but requires higher up-front investments (*high confidence*). {*3.4.1, 4.2*}

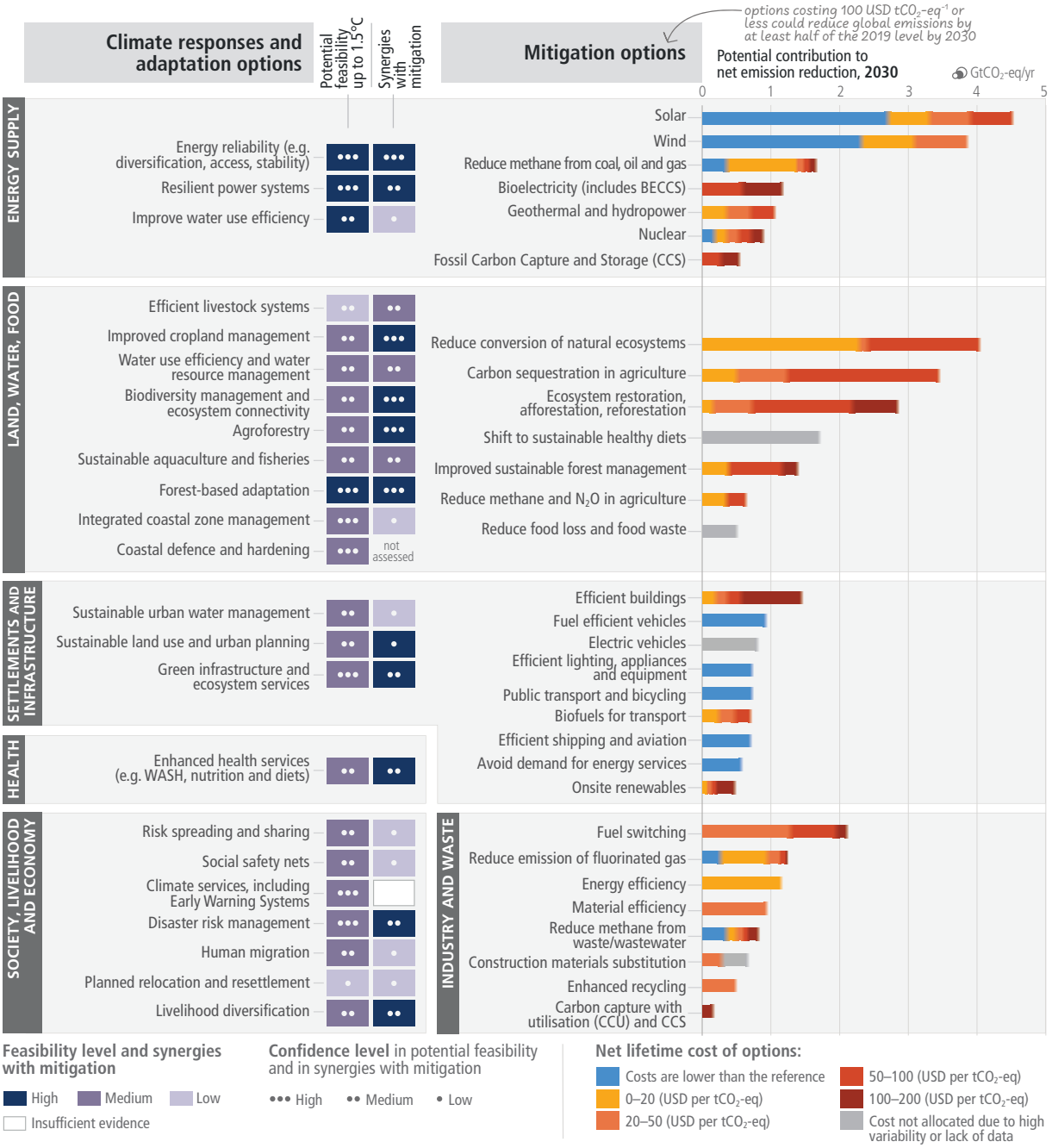
C.2.5 Ambitious mitigation pathways imply large and sometimes disruptive changes in existing economic structures, with significant distributional consequences within and between countries. To accelerate climate action, the adverse consequences of these changes can be moderated by fiscal, financial, institutional and regulatory reforms and by integrating climate actions with macroeconomic policies through (i) economy-wide packages, consistent with national circumstances, supporting sustainable low-emission growth paths; (ii) climate resilient safety nets and social protection; and (iii) improved access to finance for low-emissions infrastructure and technologies, especially in developing countries. (*high confidence*) {*4.2, 4.4, 4.7, 4.8.1*}

[49] The southern part of Mexico is included in the climatic subregion South Central America (SCA) for WGI. Mexico is assessed as part of North America for WGII. The climate change literature for the SCA region occasionally includes Mexico, and in those cases WGII assessment makes reference to Latin America. Mexico is considered part of Latin America and the Caribbean for WGIII.

[50] The evidence is too limited to make a similar robust conclusion for limiting warming to 1.5°C. Limiting global warming to 1.5°C instead of 2°C would increase the costs of mitigation, but also increase the benefits in terms of reduced impacts and related risks, and reduced adaptation needs (*high confidence*).

There are multiple opportunities for scaling up climate action

a) Feasibility of climate responses and adaptation, and potential of mitigation options in the near term



b) Potential of demand-side mitigation options by 2050

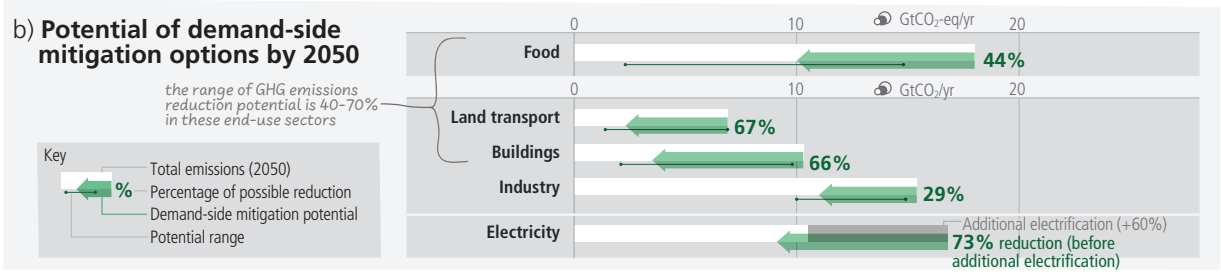


Figure SPM.7: Multiple Opportunities for scaling up climate action. Panel (a) presents selected mitigation and adaptation options across different systems. The left-hand side of panel a shows climate responses and adaptation options assessed for their multidimensional feasibility at global scale, in the near term and up to 1.5°C global warming. As literature above 1.5°C is limited, feasibility at higher levels of warming may change, which is currently not possible to assess robustly. The term response is used here in addition to adaptation because some responses, such as migration, relocation and resettlement may or may not be considered to be adaptation. Forest based adaptation includes sustainable forest management, forest conservation and restoration, reforestation

and afforestation. WASH refers to water, sanitation and hygiene. Six feasibility dimensions (economic, technological, institutional, social, environmental and geophysical) were used to calculate the potential feasibility of climate responses and adaptation options, along with their synergies with mitigation. For potential feasibility and feasibility dimensions, the figure shows high, medium, or low feasibility. Synergies with mitigation are identified as high, medium, and low. The right-hand side of Panel a provides an overview of selected mitigation options and their estimated costs and potentials in 2030. Costs are net lifetime discounted monetary costs of avoided GHG emissions calculated relative to a reference technology. Relative potentials and costs will vary by place, context and time and in the longer term compared to 2030. The potential (horizontal axis) is the net GHG emission reduction (sum of reduced emissions and/or enhanced sinks) broken down into cost categories (coloured bar segments) relative to an emission baseline consisting of current policy (around 2019) reference scenarios from the AR6 scenarios database. The potentials are assessed independently for each option and are not additive. Health system mitigation options are included mostly in settlement and infrastructure (e.g., efficient healthcare buildings) and cannot be identified separately. Fuel switching in industry refers to switching to electricity, hydrogen, bioenergy and natural gas. Gradual colour transitions indicate uncertain breakdown into cost categories due to uncertainty or heavy context dependency. The uncertainty in the total potential is typically 25–50%. **Panel (b)** displays the indicative potential of demand-side mitigation options for 2050. Potentials are estimated based on approximately 500 bottom-up studies representing all global regions. The baseline (white bar) is provided by the sectoral mean GHG emissions in 2050 of the two scenarios (IEA-STEPS and IP_ModAct) consistent with policies announced by national governments until 2020. The green arrow represents the demand-side emissions reductions potentials. The range in potential is shown by a line connecting dots displaying the highest and the lowest potentials reported in the literature. Food shows demand-side potential of socio-cultural factors and infrastructure use, and changes in land-use patterns enabled by change in food demand. Demand-side measures and new ways of end-use service provision can reduce global GHG emissions in end-use sectors (buildings, land transport, food) by 40–70% by 2050 compared to baseline scenarios, while some regions and socioeconomic groups require additional energy and resources. The last row shows how demand-side mitigation options in other sectors can influence overall electricity demand. The dark grey bar shows the projected increase in electricity demand above the 2050 baseline due to increasing electrification in the other sectors. Based on a bottom-up assessment, this projected increase in electricity demand can be avoided through demand-side mitigation options in the domains of infrastructure use and socio-cultural factors that influence electricity usage in industry, land transport, and buildings (green arrow). {*Figure 4.4*}

Mitigation and Adaptation Options across Systems

C.3 Rapid and far-reaching transitions across all sectors and systems are necessary to achieve deep and sustained emissions reductions and secure a liveable and sustainable future for all. These system transitions involve a significant upscaling of a wide portfolio of mitigation and adaptation options. Feasible, effective, and low-cost options for mitigation and adaptation are already available, with differences across systems and regions. (*high confidence*) {*4.1, 4.5, 4.6*} (*Figure SPM.7*)

C.3.1 The systemic change required to achieve rapid and deep emissions reductions and transformative adaptation to climate change is unprecedented in terms of scale, but not necessarily in terms of speed (*medium confidence*). Systems transitions include: deployment of low- or zero-emission technologies; reducing and changing demand through infrastructure design and access, socio-cultural and behavioural changes, and increased technological efficiency and adoption; social protection, climate services or other services; and protecting and restoring ecosystems (*high confidence*). Feasible, effective, and low-cost options for mitigation and adaptation are already available (*high confidence*). The availability, feasibility and potential of mitigation and adaptation options in the near term differs across systems and regions (*very high confidence*). {*4.1, 4.5.1 to 4.5.6*} (*Figure SPM.7*)

Energy Systems

C.3.2 Net zero CO_2 energy systems entail: a substantial reduction in overall fossil fuel use, minimal use of unabated fossil fuels[51], and use of carbon capture and storage in the remaining fossil fuel systems; electricity systems that emit no net CO_2; widespread electrification; alternative energy carriers in applications less amenable to electrification; energy conservation and efficiency; and greater integration across the energy system (*high confidence*). Large contributions to emissions reductions with costs less than USD 20 tCO_2-eq^{-1} come from solar and wind energy, energy efficiency improvements, and methane emissions reductions (coal mining, oil and gas, waste) (*medium confidence*). There are feasible adaptation options that support infrastructure resilience, reliable power systems and efficient water use for existing and new energy generation systems (*very high confidence*). Energy generation diversification (e.g., via wind, solar, small scale hydropower) and demand-side management (e.g., storage and energy efficiency improvements) can increase energy reliability and reduce vulnerabilities to climate change (*high confidence*). Climate responsive energy markets, updated design standards on energy assets according to current and projected climate change, smart-grid technologies, robust transmission systems and improved capacity to respond to supply deficits have high feasibility in the medium to long term, with mitigation co-benefits (*very high confidence*). {*4.5.1*} (*Figure SPM.7*)

[51] In this context, 'unabated fossil fuels' refers to fossil fuels produced and used without interventions that substantially reduce the amount of GHG emitted throughout the life cycle; for example, capturing 90% or more CO_2 from power plants, or 50–80% of fugitive methane emissions from energy supply.

Industry and Transport

C.3.3 Reducing industry GHG emissions entails coordinated action throughout value chains to promote all mitigation options, including demand management, energy and materials efficiency, circular material flows, as well as abatement technologies and transformational changes in production processes (*high confidence*). In transport, sustainable biofuels, low-emissions hydrogen, and derivatives (including ammonia and synthetic fuels) can support mitigation of CO_2 emissions from shipping, aviation, and heavy-duty land transport but require production process improvements and cost reductions (*medium confidence*). Sustainable biofuels can offer additional mitigation benefits in land-based transport in the short and medium term (*medium confidence*). Electric vehicles powered by low-GHG emissions electricity have large potential to reduce land-based transport GHG emissions, on a life cycle basis (*high confidence*). Advances in battery technologies could facilitate the electrification of heavy-duty trucks and compliment conventional electric rail systems (*medium confidence*). The environmental footprint of battery production and growing concerns about critical minerals can be addressed by material and supply diversification strategies, energy and material efficiency improvements, and circular material flows (*medium confidence*). {*4.5.2, 4.5.3*} (*Figure SPM.7*)

Cities, Settlements and Infrastructure

C.3.4 Urban systems are critical for achieving deep emissions reductions and advancing climate resilient development (*high confidence*). Key adaptation and mitigation elements in cities include considering climate change impacts and risks (e.g., through climate services) in the design and planning of settlements and infrastructure; land use planning to achieve compact urban form, co-location of jobs and housing; supporting public transport and active mobility (e.g., walking and cycling); the efficient design, construction, retrofit, and use of buildings; reducing and changing energy and material consumption; sufficiency[52]; material substitution; and electrification in combination with low emissions sources (*high confidence*). Urban transitions that offer benefits for mitigation, adaptation, human health and well-being, ecosystem services, and vulnerability reduction for low-income communities are fostered by inclusive long-term planning that takes an integrated approach to physical, natural and social infrastructure (*high confidence*). Green/natural and blue infrastructure supports carbon uptake and storage and either singly or when combined with grey infrastructure can reduce energy use and risk from extreme events such as heatwaves, flooding, heavy precipitation and droughts, while generating co-benefits for health, well-being and livelihoods (*medium confidence*). {*4.5.3*}

Land, Ocean, Food, and Water

C.3.5 Many agriculture, forestry, and other land use (AFOLU) options provide adaptation and mitigation benefits that could be upscaled in the near term across most regions. Conservation, improved management, and restoration of forests and other ecosystems offer the largest share of economic mitigation potential, with reduced deforestation in tropical regions having the highest total mitigation potential. Ecosystem restoration, reforestation, and afforestation can lead to trade-offs due to competing demands on land. Minimizing trade-offs requires integrated approaches to meet multiple objectives including food security. Demand-side measures (shifting to sustainable healthy diets[53] and reducing food loss/waste) and sustainable agricultural intensification can reduce ecosystem conversion, and methane and nitrous oxide emissions, and free up land for reforestation and ecosystem restoration. Sustainably sourced agricultural and forest products, including long-lived wood products, can be used instead of more GHG-intensive products in other sectors. Effective adaptation options include cultivar improvements, agroforestry, community-based adaptation, farm and landscape diversification, and urban agriculture. These AFOLU response options require integration of biophysical, socioeconomic and other enabling factors. Some options, such as conservation of high-carbon ecosystems (e.g., peatlands, wetlands, rangelands, mangroves and forests), deliver immediate benefits, while others, such as restoration of high-carbon ecosystems, take decades to deliver measurable results. (*high confidence*) {*4.5.4*} (*Figure SPM.7*)

C.3.6 Maintaining the resilience of biodiversity and ecosystem services at a global scale depends on effective and equitable conservation of approximately 30% to 50% of Earth's land, freshwater and ocean areas, including currently near-natural ecosystems (*high confidence*). Conservation, protection and restoration of terrestrial, freshwater, coastal and

[52] A set of measures and daily practices that avoid demand for energy, materials, land, and water while delivering human well-being for all within planetary boundaries. {*4.5.3*}

[53] 'Sustainable healthy diets' promote all dimensions of individuals' health and well-being; have low environmental pressure and impact; are accessible, affordable, safe and equitable; and are culturally acceptable, as described in FAO and WHO. The related concept of 'balanced diets' refers to diets that feature plant-based foods, such as those based on coarse grains, legumes, fruits and vegetables, nuts and seeds, and animal-sourced food produced in resilient, sustainable and low-GHG emission systems, as described in SRCCL.

ocean ecosystems, together with targeted management to adapt to unavoidable impacts of climate change reduces the vulnerability of biodiversity and ecosystem services to climate change (*high confidence*), reduces coastal erosion and flooding (*high confidence*), and could increase carbon uptake and storage if global warming is limited (*medium confidence*). Rebuilding overexploited or depleted fisheries reduces negative climate change impacts on fisheries (*medium confidence*) and supports food security, biodiversity, human health and well-being (*high confidence*). Land restoration contributes to climate change mitigation and adaptation with synergies via enhanced ecosystem services and with economically positive returns and co-benefits for poverty reduction and improved livelihoods (*high confidence*). Cooperation, and inclusive decision making, with Indigenous Peoples and local communities, as well as recognition of inherent rights of Indigenous Peoples, is integral to successful adaptation and mitigation across forests and other ecosystems (*high confidence*). {*4.5.4, 4.6*} (*Figure SPM.7*)

Health and Nutrition

C.3.7 Human health will benefit from integrated mitigation and adaptation options that mainstream health into food, infrastructure, social protection, and water policies (*very high confidence*). Effective adaptation options exist to help protect human health and well-being, including: strengthening public health programs related to climate-sensitive diseases, increasing health systems resilience, improving ecosystem health, improving access to potable water, reducing exposure of water and sanitation systems to flooding, improving surveillance and early warning systems, vaccine development (*very high confidence*), improving access to mental healthcare, and Heat Health Action Plans that include early warning and response systems (*high confidence*). Adaptation strategies which reduce food loss and waste or support balanced, sustainable healthy diets contribute to nutrition, health, biodiversity and other environmental benefits (*high confidence*). {*4.5.5*} (*Figure SPM.7*)

Society, Livelihoods, and Economies

C.3.8 Policy mixes that include weather and health insurance, social protection and adaptive social safety nets, contingent finance and reserve funds, and universal access to early warning systems combined with effective contingency plans, can reduce vulnerability and exposure of human systems. Disaster risk management, early warning systems, climate services and risk spreading and sharing approaches have broad applicability across sectors. Increasing education including capacity building, climate literacy, and information provided through climate services and community approaches can facilitate heightened risk perception and accelerate behavioural changes and planning. (*high confidence*) {*4.5.6*}

Synergies and Trade-Offs with Sustainable Development

C.4 Accelerated and equitable action in mitigating and adapting to climate change impacts is critical to sustainable development. Mitigation and adaptation actions have more synergies than trade-offs with Sustainable Development Goals. Synergies and trade-offs depend on context and scale of implementation. (*high confidence*) {*3.4, 4.2, 4.4, 4.5, 4.6, 4.9, Figure 4.5*}

C.4.1 Mitigation efforts embedded within the wider development context can increase the pace, depth and breadth of emission reductions (*medium confidence*). Countries at all stages of economic development seek to improve the well-being of people, and their development priorities reflect different starting points and contexts. Different contexts include but are not limited to social, economic, environmental, cultural, political circumstances, resource endowment, capabilities, international environment, and prior development (*high confidence*). In regions with high dependency on fossil fuels for, among other things, revenue and employment generation, mitigating risk for sustainable development requires policies that promote economic and energy sector diversification and considerations of just transitions principles, processes and practices (*high confidence*). Eradicating extreme poverty, energy poverty, and providing decent living standards in low-emitting countries / regions in the context of achieving sustainable development objectives, in the near term, can be achieved without significant global emissions growth (*high confidence*). {*4.4, 4.6, Annex I: Glossary*}

C.4.2 Many mitigation and adaptation actions have multiple synergies with Sustainable Development Goals (SDGs) and sustainable development generally, but some actions can also have trade-offs. Potential synergies with SDGs exceed potential trade-offs; synergies and trade-offs depend on the pace and magnitude of change and the development context including inequalities with consideration of climate justice. Trade-offs can be evaluated and minimised by giving emphasis to capacity building, finance, governance, technology transfer, investments, development, context specific gender-based and other social equity considerations with meaningful participation of Indigenous Peoples, local communities and vulnerable populations. (*high confidence*) {*3.4.1, 4.6, Figure 4.5, 4.9*}

C.4.3 Implementing both mitigation and adaptation actions together and taking trade-offs into account supports co-benefits and synergies for human health and well-being. For example, improved access to clean energy sources and technologies generates health benefits especially for women and children; electrification combined with low-GHG energy, and shifts to active mobility and public transport can enhance air quality, health, employment, and can elicit energy security and deliver equity. (*high confidence*) {*4.2, 4.5.3, 4.5.5, 4.6, 4.9*}

Equity and Inclusion

C.5 Prioritising equity, climate justice, social justice, inclusion and just transition processes can enable adaptation and ambitious mitigation actions and climate resilient development. Adaptation outcomes are enhanced by increased support to regions and people with the highest vulnerability to climatic hazards. Integrating climate adaptation into social protection programs improves resilience. Many options are available for reducing emission-intensive consumption, including through behavioural and lifestyle changes, with co-benefits for societal well-being. (*high confidence*) {*4.4, 4.5*}

C.5.1 Equity remains a central element in the UN climate regime, notwithstanding shifts in differentiation between states over time and challenges in assessing fair shares. Ambitious mitigation pathways imply large and sometimes disruptive changes in economic structure, with significant distributional consequences, within and between countries. Distributional consequences within and between countries include shifting of income and employment during the transition from high- to low-emissions activities. (*high confidence*) {*4.4*}

C.5.2 Adaptation and mitigation actions that prioritise equity, social justice, climate justice, rights-based approaches, and inclusivity, lead to more sustainable outcomes, reduce trade-offs, support transformative change and advance climate resilient development. Redistributive policies across sectors and regions that shield the poor and vulnerable, social safety nets, equity, inclusion and just transitions, at all scales can enable deeper societal ambitions and resolve trade-offs with sustainable development goals. Attention to equity and broad and meaningful participation of all relevant actors in decision making at all scales can build social trust which builds on equitable sharing of benefits and burdens of mitigation that deepen and widen support for transformative changes. (*high confidence*) {*4.4*}

C.5.3 Regions and people (3.3 to 3.6 billion in number) with considerable development constraints have high vulnerability to climatic hazards (see A.2.2). Adaptation outcomes for the most vulnerable within and across countries and regions are enhanced through approaches focusing on equity, inclusivity and rights-based approaches. Vulnerability is exacerbated by inequity and marginalisation linked to e.g., gender, ethnicity, low incomes, informal settlements, disability, age, and historical and ongoing patterns of inequity such as colonialism, especially for many Indigenous Peoples and local communities. Integrating climate adaptation into social protection programs, including cash transfers and public works programs, is highly feasible and increases resilience to climate change, especially when supported by basic services and infrastructure. The greatest gains in well-being in urban areas can be achieved by prioritising access to finance to reduce climate risk for low-income and marginalised communities including people living in informal settlements. (*high confidence*) {*4.4, 4.5.3, 4.5.5, 4.5.6*}

C.5.4 The design of regulatory instruments and economic instruments and consumption-based approaches, can advance equity. Individuals with high socio-economic status contribute disproportionately to emissions, and have the highest potential for emissions reductions. Many options are available for reducing emission-intensive consumption while improving societal well-being. Socio-cultural options, behaviour and lifestyle changes supported by policies, infrastructure, and technology can help end-users shift to low-emissions-intensive consumption, with multiple co-benefits. A substantial share of the population in low-emitting countries lack access to modern energy services. Technology development, transfer, capacity building and financing can support developing countries / regions leapfrogging or transitioning to low-emissions transport systems thereby providing multiple co-benefits. Climate resilient development is advanced when actors work in equitable, just and inclusive ways to reconcile divergent interests, values and worldviews, toward equitable and just outcomes. (*high confidence*) {*2.1, 4.4*}

Governance and Policies

C.6 Effective climate action is enabled by political commitment, well-aligned multilevel governance, institutional frameworks, laws, policies and strategies and enhanced access to finance and technology. Clear goals, coordination across multiple policy domains, and inclusive governance processes facilitate effective climate action. Regulatory and economic instruments can support deep emissions reductions and climate resilience if scaled up and applied widely. Climate resilient development benefits from drawing on diverse knowledge. (*high confidence*) {*2.2, 4.4, 4.5, 4.7*}

C.6.1 Effective climate governance enables mitigation and adaptation. Effective governance provides overall direction on setting targets and priorities and mainstreaming climate action across policy domains and levels, based on national circumstances and in the context of international cooperation. It enhances monitoring and evaluation and regulatory certainty, prioritising inclusive, transparent and equitable decision-making, and improves access to finance and technology (see C.7). (*high confidence*) {*2.2.2, 4.7*}

C.6.2 Effective local, municipal, national and subnational institutions build consensus for climate action among diverse interests, enable coordination and inform strategy setting but require adequate institutional capacity. Policy support is influenced by actors in civil society, including businesses, youth, women, labour, media, Indigenous Peoples, and local communities. Effectiveness is enhanced by political commitment and partnerships between different groups in society. (*high confidence*) {*2.2, 4.7*}

C.6.3 Effective multilevel governence for mitigation, adaptation, risk management, and climate resilient development is enabled by inclusive decision processes that prioritise equity and justice in planning and implementation, allocation of appropriate resources, institutional review, and monitoring and evaluation. Vulnerabilities and climate risks are often reduced through carefully designed and implemented laws, policies, participatory processes, and interventions that address context specific inequities such as those based on gender, ethnicity, disability, age, location and income. (*high confidence*) {*4.4, 4.7*}

C.6.4 Regulatory and economic instruments could support deep emissions reductions if scaled up and applied more widely (*high confidence*). Scaling up and enhancing the use of regulatory instruments can improve mitigation outcomes in sectoral applications, consistent with national circumstances (*high confidence*). Where implemented, carbon pricing instruments have incentivized low-cost emissions reduction measures but have been less effective, on their own and at prevailing prices during the assessment period, to promote higher-cost measures necessary for further reductions (*medium confidence*). Equity and distributional impacts of such carbon pricing instruments, e.g., carbon taxes and emissions trading, can be addressed by using revenue to support low-income households, among other approaches. Removing fossil fuel subsidies would reduce emissions[54] and yield benefits such as improved public revenue, macroeconomic and sustainability performance; subsidy removal can have adverse distributional impacts, especially on the most economically vulnerable groups which, in some cases can be mitigated by measures such as redistributing revenue saved, all of which depend on national circumstances (*high confidence*). Economy-wide policy packages, such as public spending commitments and pricing reforms, can meet short-term economic goals while reducing emissions and shifting development pathways towards sustainability (*medium confidence*). Effective policy packages would be comprehensive, consistent, balanced across objectives, and tailored to national circumstances (*high confidence*). {*2.2.2, 4.7*}

C.6.5 Drawing on diverse knowledges and cultural values, meaningful participation and inclusive engagement processes—including Indigenous Knowledge, local knowledge, and scientific knowledge—facilitates climate resilient development, builds capacity and allows locally appropriate and socially acceptable solutions. (*high confidence*) {*4.4, 4.5.6, 4.7*}

[54] Fossil fuel subsidy removal is projected by various studies to reduce global CO_2 emission by 1 to 4%, and GHG emissions by up to 10% by 2030, varying across regions (*medium confidence*).

Finance, Technology and International Cooperation

C.7 Finance, technology and international cooperation are critical enablers for accelerated climate action. If climate goals are to be achieved, both adaptation and mitigation financing would need to increase many-fold. There is sufficient global capital to close the global investment gaps but there are barriers to redirect capital to climate action. Enhancing technology innovation systems is key to accelerate the widespread adoption of technologies and practices. Enhancing international cooperation is possible through multiple channels. (*high confidence*) {*2.3, 4.8*}

C.7.1 Improved availability of and access to finance[55] would enable accelerated climate action (*very high confidence*). Addressing needs and gaps and broadening equitable access to domestic and international finance, when combined with other supportive actions, can act as a catalyst for accelerating adaptation and mitigation, and enabling climate resilient development (*high confidence*). If climate goals are to be achieved, and to address rising risks and accelerate investments in emissions reductions, both adaptation and mitigation finance would need to increase many-fold (*high confidence*). {*4.8.1*}

C.7.2 Increased access to finance can build capacity and address soft limits to adaptation and avert rising risks, especially for developing countries, vulnerable groups, regions and sectors (*high confidence*). Public finance is an important enabler of adaptation and mitigation, and can also leverage private finance (*high confidence*). Average annual modelled mitigation investment requirements for 2020 to 2030 in scenarios that limit warming to 2°C or 1.5°C are a factor of three to six greater than current levels[56], and total mitigation investments (public, private, domestic and international) would need to increase across all sectors and regions (*medium confidence*). Even if extensive global mitigation efforts are implemented, there will be a need for financial, technical, and human resources for adaptation (*high confidence*). {*4.3, 4.8.1*}

C.7.3 There is sufficient global capital and liquidity to close global investment gaps, given the size of the global financial system, but there are barriers to redirect capital to climate action both within and outside the global financial sector and in the context of economic vulnerabilities and indebtedness facing developing countries. Reducing financing barriers for scaling up financial flows would require clear signalling and support by governments, including a stronger alignment of public finances in order to lower real and perceived regulatory, cost and market barriers and risks and improving the risk-return profile of investments. At the same time, depending on national contexts, financial actors, including investors, financial intermediaries, central banks and financial regulators can shift the systemic underpricing of climate-related risks, and reduce sectoral and regional mismatches between available capital and investment needs. (*high confidence*) {*4.8.1*}

C.7.4 Tracked financial flows fall short of the levels needed for adaptation and to achieve mitigation goals across all sectors and regions. These gaps create many opportunities and the challenge of closing gaps is largest in developing countries. Accelerated financial support for developing countries from developed countries and other sources is a critical enabler to enhance adaptation and mitigation actions and address inequities in access to finance, including its costs, terms and conditions, and economic vulnerability to climate change for developing countries. Scaled-up public grants for mitigation and adaptation funding for vulnerable regions, especially in Sub-Saharan Africa, would be cost-effective and have high social returns in terms of access to basic energy. Options for scaling up mitigation in developing countries include: increased levels of public finance and publicly mobilised private finance flows from developed to developing countries in the context of the USD 100 billion-a-year goal; increased use of public guarantees to reduce risks and leverage private flows at lower cost; local capital markets development; and building greater trust in international cooperation processes. A coordinated effort to make the post-pandemic recovery sustainable over the longer-term can accelerate climate action, including in developing regions and countries facing high debt costs, debt distress and macroeconomic uncertainty. (*high confidence*) {*4.8.1*}

C.7.5 Enhancing technology innovation systems can provide opportunities to lower emissions growth, create social and environmental co-benefits, and achieve other SDGs. Policy packages tailored to national contexts and technological characteristics have been effective in supporting low-emission innovation and technology diffusion. Public policies can

[55] Finance originates from diverse sources: public or private, local, national or international, bilateral or multilateral, and alternative sources. It can take the form of grants, technical assistance, loans (concessional and non-concessional), bonds, equity, risk insurance and financial guarantees (of different types).

[56] These estimates rely on scenario assumptions.

support training and R&D, complemented by both regulatory and market-based instruments that create incentives and market opportunities. Technological innovation can have trade-offs such as new and greater environmental impacts, social inequalities, overdependence on foreign knowledge and providers, distributional impacts and rebound effects[57], requiring appropriate governance and policies to enhance potential and reduce trade-offs. Innovation and adoption of low-emission technologies lags in most developing countries, particularly least developed ones, due in part to weaker enabling conditions, including limited finance, technology development and transfer, and capacity building. (*high confidence*) {*4.8.3*}

C.7.6 International cooperation is a critical enabler for achieving ambitious climate change mitigation, adaptation, and climate resilient development (*high confidence*). Climate resilient development is enabled by increased international cooperation including mobilising and enhancing access to finance, particularly for developing countries, vulnerable regions, sectors and groups and aligning finance flows for climate action to be consistent with ambition levels and funding needs (*high confidence*). Enhancing international cooperation on finance, technology and capacity building can enable greater ambition and can act as a catalyst for accelerating mitigation and adaptation, and shifting development pathways towards sustainability (*high confidence*). This includes support to NDCs and accelerating technology development and deployment (*high confidence*). Transnational partnerships can stimulate policy development, technology diffusion, adaptation and mitigation, though uncertainties remain over their costs, feasibility and effectiveness (*medium confidence*). International environmental and sectoral agreements, institutions and initiatives are helping, and in some cases may help, to stimulate low GHG emissions investments and reduce emissions (*medium confidence*). {*2.2.2, 4.8.2*}

[57] Leading to lower net emission reductions or even emission increases.

Scoping Comment Letter 0005

Chong Family <rdbtec@aol.com> 5/15/2024 3:27 PM

Request EIS information Kauai MR

To PMRFPublicAffairs@us.navy.mil <pmrfpublicaffairs@us.navy.mil> • info@pmrf-kpgo-eis.com

---

To whom it may concern,

Like to request information on the EIS being presented for the Pacific Missile Range Facility on Kauai?

Thank-you,
R Chong
Honolulu, Hi 96816

Scoping Comment Letter 0006

Consent for storing submitted data
True

First Name
Valerie

Last Name
Weiss

Add Me to the Project Mailing List
Yes

Street
6616 Alahele St

City
Kapaa

State
HI

Zip code
96746

Email
valerieweiss31@gmail.com

Organization/Affiliation (if any)
Individual

Comments

Please tally my vote as NO on extending the lease at PMRF. This state has already seen the results of toxic pollution by the military. The Navy has had too much leeway in their denying that they are ever to blame. At PMRF spilled PFAS are in our ocean. There are likely many other toxics spilled or dumped that we usually do not get informed on. And stop dumping Naval ships into our ocean claiming they will be reefs. They are junk and do not belong in our waters for any reason including RIMPAC exercises.

Add Attachments (optional)

Submitted on
05/22/2024

Scoping Comment Letter 0007

Puri, Naadia S LT USN (USA) <naadia.s.puri.mil@us.navy.mil> 5/23/2024 8:29 PM
Scope Meeting
To info@pmrf-kpgo-eis.com

Sir/Ma'am,

My name is LT Naadia Puri and I work at Navy Region Pearl Harbor, Oahu. I am unable to make these meetings in person on island, is there a link I can attend to listen to the presentation?

V/R,
LT Naadia Puri

Scoping Comment Letter 0008

Reef A Migita <reef.migita@doh.hawaii.gov> 5/23/2024 9:41 PM

Request for comment on Real Estate EIS -U.S. Navy Pacific Missile Range Facility

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> Copy Darryl C Lum <darryl.lum@doh.hawaii.gov>

Ms. Kerry Wells,

The Department of Health (DOH) Clean Water Branch (CWB) has received the request for comment regarding the U.S. Department of the Navy (Navy) and National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS).

As the EIS will evaluate the potential environmental consequences of the Navy's proposal to retain the use of 8,348 acres of State lands presently utilized pursuant to leases and easements on Kaua`i, Hawai`i, for operational continuity and sustainment at the Pacific Missile Range Facility (PMRF), the CWB offers the following comments:

The DOH and County of Kaua`i has settled with Nā Kia`a Kai and Surfrider Foundation to issue one or more draft National Pollutant Discharge Elimination System (NPDES) permits for all outfalls of the Mānā Plain Drainage Ditch System, including but not limited to the outfalls of Kīkīaola Harbor Drain, Kawai`ele Outfall, Nohili Outfall, First Ditch, Second Ditch, and Cox Drain. (The attached settlement agreement substantvely represents what the parties agreed to and have filed with the US District Court for the District of Hawaii.)

The Kawai`ele Outfall exists within PMRF's Installation Boundary, as shown on Enclosure (2) – Project Location Map (See 20240510.NAV PAC MISSLE FAC EIS.pdf) and the Navy currently leases the land on the Mānā Plain from the Department of Land and Natural Resources (DLNR) under General Lease No. S-3852 and is responsible for the operation and maintenance of the canals, including the pumps and associated infrastructure. Hence, it appears that the Navy is responsible for discharges from this outfall. The Kawai`ele Outfall is where Kinikini Ditch connects to the open coastal waters abuttng the PMRF. In addition, there is another possible outfall (i.e., Nohili Outfall) from within PMRF's jurisdiction and leased area contributing to the discharge that could also be impacted.

The Order for Summary Judgement and Dismissal between Nā Kia`a Kai and Surfrider Foundattion, and the State of Hawaii, Agribusiness Development Corporation (ADC), see attached, may affect the Navy even if the Navy was not subject to the case. Consideration should be given to the situation where DLNR land is no longer managed by ADC. What is ADC's current role regarding the subject land and when does this role expire? If ADC is no longer involved with this land, is it the Navy's intent to apply for NPDES permit coverage for the discharges subject to the Order?

Sincerely,

Reef Migita

Engineering Section Supervisor | Environmental Management Division | Clean Water Branch

Hawai'i State Department of Health | Ka 'Oihana Olakino

2827 Waimano Home Road, Room 225 | Pearl City, HI 96782

Office: (808) 586-4309

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- 2024-1-30 Settlement Agreement.pdf (315 KB)
- 2019-7-9_Order_re_SJ_and_Dismissal.pdf (308 KB)

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Attorneys for Plaintiffs*

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAI‘I

NĀ KIA‘I KAI, an unincorporated association, and SURFRIDER FOUNDATION, a non-profit corporation, Plaintiffs, v. COUNTY OF KAUA‘I, and ELIZABETH A. CHAR, in her official capacity as Director of Health of the DEPARTMENT OF HEALTH, STATE OF HAWAI‘I, Defendants.	Civil No. 22-00304 DKW-KJM SETTLEMENT AGREEMENT AND ORDER (Remedy Phase); ATTACHMENTS A – B

* Pursuant to Local Rule 10.2(b), please refer to the signature page for the complete list of parties represented.

SETTLEMENT AGREEMENT

WHEREAS, in July 2019, this Court ruled in a previous related lawsuit that discharging pollutants from the Mānā Plain Drainage Ditch System—which has six (6) ocean outfalls including the Kīkīaola Harbor Drain—to the Pacific Ocean without the required National Pollutant Discharge Elimination System ("NPDES") permit violates the Clean Water Act ("CWA"), 33 U.S.C. § 1251 *et seq.*, *see Nā Kia'i Kai v. Nakatani*, 401 F. Supp. 3d 1097, 1100, 1103, 1104 (D. Hawai'i 2019);

WHEREAS, in July 2018, the Court granted the Director of Health for the State of Hawai'i Department of Health's ("DOH's") motion to be dismissed from the previous related lawsuit;

WHEREAS, after the Court issued its July 2019 order in the previous related lawsuit, the State of Hawai'i Agribusiness Development Corporation applied for a NPDES permit for all of the Mānā Plain Drainage System outfalls except for the Kīkīaola Harbor Drain;

WHEREAS, since May 15, 2017, if not earlier, the County of Kaua'i ("County") has been solely responsible (per relevant standard operating procedures) for authorizing discharges from the Kīkīaola Harbor Drain to the Pacific Ocean during times of significant rainfall events (ECF No. 38, ¶3);

WHEREAS, on or about March 31, 2022, the County submitted to DOH a NPDES permit application for discharges to the Pacific Ocean from the Kīkīaola Habor Drain (ECF No. 38, ¶27);

WHEREAS, to date, DOH/the Director of Health has not issued any NPDES permit for any of the Mānā Plain Drainage Ditch System's six (6) outfalls, including the Kīkīaola Harbor Drain;

WHEREAS, on July 14, 2022, Plaintiffs Nā Kia'i Kai and Surfrider Foundation (hereinafter, collectively referred to as "Plaintiffs") filed suit in this case against the County and Elizabeth A. Char, in her official capacity as Director of Health of DOH (hereinafter, collectively referred to as "Defendants") alleging that the County was violating the CWA by discharging polluted drainage waters from the Kīkīaola Harbor Drain to the Pacific Ocean without the required NPDES permit (ECF No. 1);

WHEREAS, Plaintiffs named the Director of Health as a necessary party to the action because DOH, through the Director of Health, is responsible for issuing NPDES permits in compliance with the CWA, and because Plaintiffs alleged that DOH had refused to issue a NPDES permit for discharges from the Kīkīaola Harbor Drain (ECF No. 1, ¶26);

WHEREAS, Plaintiffs further requested injunctive relief and civil penalties pursuant to 33 U.S.C. § 1319(d) and 40 C.F.R. § 19.4, among other relief, to

remedy the County's alleged CWA violations (ECF No. 1 at 25-26), as well as an award of litigation costs, including reasonable attorney and expert witness fees, pursuant to 33 U.S.C. § 1365(d);

WHEREAS, on March 31, 2023, Plaintiffs and the County entered into a joint stipulation of facts regarding the County's discharges from the Kīkīaola Harbor Drain (ECF No. 38), which included stipulated facts that the Kīkīaola Harbor Drain collects stormwater runoff from land uses located both on and off of the Waimea 400 Parcel Site that the County owns, including from a gravel and asphalt plant ("Maui Asphalt") and the Waimea Wastewater Treatment Plant ("Waimea WWTP"), and then discharges that stormwater runoff to the nearshore waters of the Pacific Ocean (ECF No. 38, ¶14);

WHEREAS, on March 31, 2023, Plaintiffs moved for summary judgment regarding the County's liability under the CWA for pollution from the Kīkīaola Harbor Drain (ECF No. 39);

WHEREAS, on April 17, 2023, this Court approved and ordered the parties' joint stipulation to bifurcate this action into two phases, *i.e.*, the "Liability Phase" and the "Remedy Phase," to conserve judicial resources and to provide additional time for the parties to explore settlement before incurring substantial further costs (ECF No. 50);

WHEREAS, on May 18, 2023, the County filed its statement of no position on Plaintiffs' motion for summary judgment (ECF Nos. 53 & 54), pursuant to the Plaintiffs' and the County's joint stipulation, approved and ordered by the Court on May 19, 2023, whereby the County agreed to file the statement of no position in exchange for Plaintiffs' agreement not to seek attorneys' fees and civil penalties against the County associated with the "Liability Phase" of this lawsuit (ECF No. 60);

WHEREAS, on June 13, 2023, the Court entered an order granting Plaintiffs' motion for summary judgment, which completely resolved the "Liability Phase" of this lawsuit (ECF No. 65);

WHEREAS, the parties have reached an agreement resolving the "Remedy Phase" of this case;

WHEREAS, the parties have agreed to enter into this Settlement Agreement ("Agreement"), without any admission of fact or law, which they consider to be a just, fair, adequate, and equitable resolution of the "Remedy Phase" of this action; and

WHEREAS, it is in the interest of the public, the parties, and judicial economy to resolve the "Remedy Phase" of this action without protracted litigation;

NOW, THEREFORE, the parties to this Agreement ("Parties") agree, and the Court orders, as follows:

DOH/THE DIRECTOR OF HEALTH OBLIGATIONS

1. Within three hundred sixty-five (365) days of execution of this Agreement, DOH/the Director of Health shall issue one or more draft NPDES permits for all outfalls of the Mānā Plain Drainage Ditch System, including but not limited to the outfalls of Kīkīaola Harbor Drain, Kawai'ele Outfall, Nohili Outfall, First Ditch, Second Ditch, and Cox Drain as identified in *Nā Kia'i Kai v. Nakatani*, 401 F. Supp. 3d 1097, 1100, 1103, 1104 (2019); and *Nā Kia'i Kai v. Cnty. of Kaua'i*, No. 22-CV-00304-DKW-KJM, 2023 WL 3981422, at *4 (D. Haw. June 13, 2023). DOH/the Director of Health shall notify Plaintiffs upon the preparation and public notice of any and all draft NPDES permits pursuant to this Paragraph.

2. DOH/the Director of Health shall issue one or more final NPDES permits for all outfalls of the Mānā Plain Drainage Ditch System, including but not limited to Kīkīaola Harbor Drain, Kawai'ele Outfall, Nohili Outfall, First Ditch, Second Ditch, and Cox Drain as identified in *Nā Kia'i Kai v. Nakatani*, 401 F. Supp. 3d 1097, 1100, 1103, 1104 (2019); and *Nā Kia'i Kai v. Cnty. of Kaua'i*, No. 22-CV-00304-DKW-KJM, 2023 WL 3981422, at *4 (D. Haw. June 13, 2023). For each and every draft NPDES permit prepared and publicly noticed pursuant to Paragraph 1, *supra*, DOH/the Director of Health shall issue a final NPDES permit

within one hundred eighty (180) days of public notice of such draft NPDES permit. DOH/the Director of Health shall notify Plaintiffs upon the issuance of any and all final NPDES permits pursuant to this Paragraph.

3. If DOH/the Director of Health anticipates missing a draft or final NPDES permit deadline set forth in Paragraphs 1 or 2, *supra*, DOH/the Director of Health shall notify Plaintiffs at least thirty (30) days before the missed deadline. Plaintiffs and DOH/the Director of Health shall meet and confer over a period of at least ten (10) days on whether to extend the deadline by agreement. If Plaintiffs and DOH/the Director of Health are unable to reach agreement during the ten (10)-day meet-and-confer period, DOH/the Director of Health may file a motion to extend the deadline based on unforeseen circumstances.

COUNTY OBLIGATIONS

4. The County shall not withdraw its NPDES permit application, submitted to DOH on or about March 31, 2022, for discharges from the Kīkīaola Harbor Drain.

5. Until the DOH/the Director of Health issues a final NPDES permit to the County for discharges from Kīkīaola Harbor Drain, the County shall conduct water quality monitoring via either Department of Public Works employees or third parties under contract as follows:

a. Frequency:

i. Beginning within ninety (90) days of execution of this Agreement, dry weather sampling twice each calendar year (in separate quarters) in water and bed sediment (Note: Bed sediment samples and testing are required for only enterococcus, TPH, PAH, glyphosate, and the extended panel of pesticides (*see* Paragraph 5.b, *infra*)).

ii. Beginning upon execution of this Agreement, wet weather sampling in water for each time that the Kīkīaola Harbor Drain is opened as follows:

1. Upon determining the need to open the Kīkīaola Harbor Drain, the County Department of Public Works shall immediately notify all contractors and subcontractors that are directly or indirectly responsible for sample collection so that samples may be collected as soon as practicable after opening the Kīkīaola Harbor Drain.
2. The County shall make best efforts to sample once as soon as practicable within six (6) hours after opening the Kīkīaola Harbor Drain.
3. If, despite best efforts, the County is unable to conduct wet weather sampling within six (6) hours after opening, the County shall sample once within twelve (12) hours after opening. In addition, within twenty-four (24) hours after opening the Kīkīaola Harbor Drain, the County shall notify Plaintiffs of the failure to conduct wet weather sampling within the six (6)-hour timeframe and the specific reasons therefor.
4. The County shall sample once twenty-four (24) hours after opening, if the outfall is discharging into the ocean.
5. The County shall sample once forty-eight (48) hours after opening, if the outfall is discharging into the ocean.
6. Plaintiffs acknowledge that if the County has not secured an agreement with third-party contractors to conduct the water quality monitoring required under Paragraph 5 of this Agreement before the Kīkīaola Harbor Drain is opened, the County will conduct the wet weather water

quality monitoring required under Paragraph 5 of this Agreement pursuant to an emergency contract.

b. Parameters: Turbidity, all species of nitrogen, phosphorous, enterococcus, TSS, TPH, PAH, glyphosate, and extended panel of pesticides (*see* Attachment A).

c. Holding times: The County shall make best efforts to ensure that water quality testing is conducted within holding times as follows:

Turbidity: 48 hours

All species of nitrogen: 48 hours for NO2; otherwise, 28 days

Phosphorous: 28 days

Enterococcus: 8 hours

TSS: 7 days

TPH: 7 days

PAH: 7 days

Glyphosate: 14 days

Extended panel of pesticides (*see* Attachment A): 7 days

If water quality testing is not conducted within a holding time, the County shall, in its quarterly water quality reporting to Plaintiffs, *see* Paragraph 5.h, *infra*, notify Plaintiffs of the failure to conduct water quality testing within the holding time and the specific reasons therefor.

d. Sampling Location: The ditch between the berm at Kīkīaola Small Boat Harbor and Kaumualiʻi Highway (*see* Attachment B).

e. Flow measurements: The County shall measure flow in the ditch at the same time and location as each dry and wet weather sampling event described in Paragraphs 5.a and 5.d, *supra*;

f. Except for any wet weather sampling conducted under an emergency contract pursuant to Paragraph 5.a.ii.6, *supra*, the County shall prepare a sampling and analysis plan (SAP) outlining the protocols and methods and a quality assurance plan for Plaintiffs' review and input prior to implementation; Plaintiffs acknowledge that the County's third-party contractors will need a minimum of four (4) weeks from their contract notice to proceed (NTP) with the County to coordinate and develop a draft of their SAP;

g. All laboratories conducting water quality testing pursuant to Paragraphs 5.a.i and 5.b, *supra*, will follow quality assurance/quality control protocols; and

h. The County shall provide all testing results and flow measurements to Plaintiffs on a quarterly basis.

6. Waimea 400 Parcel. Beginning within thirty (30) days of execution of this Agreement, the County shall implement the following best management practices to minimize pollution from the Waimea 400 Parcel and the ditches leading to the Kīkīaola Harbor Drain:

a. Pollution control measures including biofilters and absorbent fabric for petroleum products shall be deployed and maintained in the area where equipment is staged; and

b. Any future activity requiring grubbing shall include deployment of erosion control measures including biofilter socks or silt fences.

7. Waimea WWTP. Beginning within thirty (30) days of execution of this Agreement, the County shall implement the following pollution control measures at the Waimea WWTP:

a. Covered storage and secondary containment for lubricating oil, and all fuel shall be stored in approved containers and storage cabinets;

b. Absorbents shall be utilized during repair of the Waimea WWTP pumps and other mechanical equipment to prevent contamination from oil and other petroleum products;

c. Herbicides made with glyphosate shall not be used at the Waimea WWTP;

d. The County shall provide R-1 quality effluent to the Waimea Athletic Field and shall continue to seek new customers for the use of R-1 water;

8. Maui Asphalt. Beginning within thirty (30) days of execution of this Agreement:

a. The County shall conduct quarterly inspections of Maui Asphalt's operations via either a Department of Public Works employee or a third-party inspector under contract. Maui Asphalt's Stormwater Pollution Prevention Program, as per its NPDES Permit from DOH, will be used to develop a best management practice checklist for each potential pollutant source at Maui Asphalt's operation, which the County will use in conducting the quarterly inspections.

b. The County shall provide quarterly updates to Plaintiffs regarding Maui Asphalt's progress on securing a new site for its plant.

NOTIFICATIONS

9. Whenever notifications, reporting, or other communications to Plaintiffs or Defendants are required by this Agreement, they shall be in writing, and be addressed and sent via U.S. Mail and/or electronic mail as follows:

To Plaintiffs in this lawsuit, via Plaintiffs' attorneys of record:

Kylie W. Wager Cruz

Elena L. Bryant
David L. Henkin
Earthjustice
850 Richards Street, Suite 400
Honolulu, Hawai‘i 96813
kwager@earthjustice.org
ebryant@earthjustice.org
dhenkin@earthjustice.org

To Defendant the Director of Health, via the Director of Health's attorneys of record:

Melissa J. Kolonie
Dale K. Sakata
Joanna B.K.F. Yeh
Deputy Attorney General
Department of the Attorney General, State of Hawai‘i
465 S. King Street, Room 200
Honolulu, Hawai‘i 96813
melissa.j.kolonie@hawaii.gov
dale.k.sakata@hawaii.gov
joanna.yeh@hawaii.gov

To Defendant County of Kaua‘i, via the County Engineer and the County's attorneys of record:

Troy Tanigawa
County Engineer
Department of Public Works
County of Kaua‘i
4444 Rice Street, Suite 275
Līhu‘e, Hawai‘i 96766
ttanigawa@kauai.gov

Andrew Michaels
Matthew Bracken
Deputy County Attorney
Office of the County Attorney
County of Kaua‘i
4444 Rice Street, Suite 220
Līhu‘e, Hawai‘i 96766
amichaels@kauai.gov

mbracken@kauai.gov

10. Any Party may, by written notice to the other Parties, change its designated notice recipient or notice address provided in Paragraph 9, *supra*.

ENFORCEMENT OF THE AGREEMENT

11. The United States District Court for the District of Hawai‘i will retain jurisdiction to enforce the terms of this Agreement. *See Kokkonen v. Guardian Life Ins. Co. of America*, 511 U.S. 375 (1994). In granting any motion by Plaintiffs to enforce the terms of the Agreement, the Court shall be limited to ordering specific performance. Should the Court order specific performance and Plaintiffs subsequently seek to enforce that order, the Court shall have available to it all remedies for any violation of the Court's specific performance order.

USE AND EFFECT OF AGREEMENT

12. This Agreement was negotiated and executed by the Parties in good faith to avoid expensive and protracted litigation regarding the "Remedy Phase" of this lawsuit. This Agreement shall not constitute an admission or adjudication with respect to any allegation made by any Party. This Agreement shall not constitute an admission of any wrongdoing or misconduct on the part of Defendants. This Agreement shall not constitute an acknowledgment by Plaintiffs that there was no wrongdoing or misconduct.

13. Plaintiffs reserve their right to bring subsequent actions challenging the adequacy of any NPDES permit that the County may obtain from DOH/the Director of Health. This Agreement shall not constitute an admission by Plaintiffs that the County's compliance with the Agreement satisfies its obligations under the CWA.

14. Plaintiffs and DOH/the Director of Health agree that nothing in this Agreement precludes DOH/the Director of Health from regulating discharges into ditches of the Mānā Plain Drainage Ditch System, in addition to the discharges from the outfalls into the ocean.

15. Plaintiffs and DOH/the Director of Health agree that nothing in this Agreement affects the Director of Health's dismissal from the lawsuit *Nā Kia'i Kai. v. Nakatani*, 401 F. Supp. 3d 1097 (2019).

CIVIL PENALTIES

16. Plaintiffs waive their rights to seek assessment of civil penalties against the County for past discharges and for any discharges that have or will occur during the "Remedy Phase" of the lawsuit through DOH/the Director of Health's issuance of a NPDES permit for the Kīkīaola Harbor Drain.

FEES AND COSTS

17. Plaintiffs reserve their rights to seek recovery from DOH/the Director of Health of attorneys' fees incurred in the "Liability Phase" of this lawsuit

through the Court's June 13, 2023 order granting Plaintiffs summary judgment. Plaintiff have waived their rights to seek recovery from the County of attorneys' fees incurrent in the "Liability Phase" of this lawsuit, as previously stated in paragraph 2 of the Joint Stipulation Between Plaintiffs and Defendant County of Kaua'i Re: Plaintiff's Motion for Summary Judgment, filed May 19, 2023.

18. Plaintiffs waive their rights to seek recovery from the County and DOH/the Director of Health of attorneys' fees incurred in the "Remedy Phase" of the lawsuit, *i.e.* after June 13, 2023, through the Court's approval of this Agreement.

19. Plaintiffs reserve their rights to seek recovery from DOH/the Director of Health of Plaintiffs' costs other than attorneys' fees incurred in the "Liability Phase" or "Remedy Phase" of this lawsuit, through the Court's approval of this Agreement.

20. The County shall remit to Plaintiffs' counsel within 45 days of the execution and delivery of this Agreement FIVE THOUSAND DOLLARS ($5,000), which shall fully satisfy Plaintiffs' claim against the County for costs other than attorneys' fees incurred in the "Liability Phase" and "Remedy Phase" of this lawsuit, through the Court's approval of this Agreement.

21. Once the Court has entered an order dismissing this case with prejudice, Plaintiffs and DOH/the Director of Health will have sixty (60) days to

reach agreement regarding Plaintiffs' claim for an award of attorneys' fees and costs. If Plaintiffs and DOH/the Director of Health are unable to reach agreement on an amount pursuant to the pre-motion meet-and-confer provisions set forth in Local Rule 54.2(d):

a. Plaintiffs and DOH/the Director of Health shall file a joint statement pursuant to Local Rule 54.2(e) within forty-five (45) days after entry of an order dismissing the case with prejudice, and

b. Plaintiffs shall file a motion for attorneys' fees and costs within (60) days after the Court's entry of an order dismissing the case with prejudice.

22. Plaintiffs reserve their rights to seek recovery from the County and DOH/the Director of Health of attorneys' fees and costs incurred in enforcing the terms of this Agreement after the Court's approval of this Agreement.

AUTHORIZATION TO SIGN

23. This Agreement shall apply to and be binding upon the Parties, their members, delegates, and assigns. The undersigned representatives certify that they are authorized by the Party or Parties they represent to enter into this Agreement and to execute and legally bind that Party or Parties to the terms and conditions of this Agreement.

Executed this 30th day of January, 2024.

/s/ Kylie W. Wager Cruz
DAVID L. HENKIN
KYLIE W. WAGER CRUZ
ELENA L. BRYANT
EARTHJUSTICE

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Attorneys for Defendant
ELIZABETH A. CHAR, in her official capacity as Director of Health of the STATE OF HAWAI‘I DEPARTMENT OF HEALTH

APPROVED AND SO ORDERED

DATED:

_____

UNITED STATES DISTRICT COURT

DISTRICT OF HAWAI‘I

NA KIA‘I KAI, an unincorporated association, SURFRIDER FOUNDATION, a non-profit corporation, and PESTICIDE ACTION NETWORK NORTH AMERICA, a non-profit corporation, Plaintiffs, v. JAMES NAKATANI in his official capacity as Executive Director of the STATE OF HAWAI‘I AGRIBUSINESS DEVELOPMENT CORPORATION, Defendant.	CIVIL NO. 18-00005 DKW-RLP **ORDER RE: SUMMARY JUDGMENT AND DISMISSAL**

INTRODUCTION

Plaintiffs Na Kia‘i Kai, Surfrider Foundation, and Pesticide Action Network North America (Plaintiffs) seek injunctive and declaratory relief for alleged violations of the Clean Water Act (CWA), 33 U.S.C. §§1251-1311(a), and breach of public trust under Haw. Const. art. XI §§1, 6, as a result of discharges from the Mānā Plain near Kekaha, Kauai, Hawaii into the Pacific Ocean. Plaintiffs seek summary judgment on both claims, while Defendant Nakatani, as Director of the

State of Hawai‘i Agribusiness Development Corporation (ADC or the State), seeks summary judgment on the CWA claim and dismissal of the public trust claim. Plaintiffs also seek to strike an expert report filed by the State as part of its summary judgment briefing.

For the reasons set forth below, Plaintiffs' Motion for Summary Judgment is GRANTED IN PART as to the CWA claim but DENIED as to the public trust claim. The State's Motion for Partial Summary Judgment as to the CWA claim is DENIED, but the Motion to Dismiss the public trust claim is GRANTED. Plaintiffs' Motion to Strike is DENIED as moot.

FACTUAL BACKGROUND

The Area

The Mānā Plain on Kaua‘i's western coast contains naturally-occurring wetland areas that have been drained for agricultural production. Defendant's Concise Statement of Facts in Support of Motion for Partial Summary Judgment (Defendant SOF), Dkt. No. 56, ¶1-2; Plaintiffs' Concise Statement in Opposition to Motion for Partial Summary Judgment (Plf. Opp. SOF), Dkt. No. 66, ¶2. To drain the area, a system of unlined drainage canals was built below the natural water table to draw water out of the wetlands. To avoid water standing in the

drainage canals, pumps were installed to draw water through the canals, lift the water up and over coastal dunes, and pump it into the ocean. *Id.* This drainage system consists of forty miles of earthen, unlined canals and ditches, two pumping stations at Kawai‘ele and Nohili, and six outfalls where water discharges from the canal system into the Pacific Ocean. Plaintiffs' Concise Statement of Facts in Support of Motion (Plaintiff SOF), Dkt. No. 52, ¶2. In addition, in order to discharge water from some of the outfalls, excavators are used to open sand berms and allow water from the canals to drain into the ocean. *Id.* ¶¶3, 5.

This century-old drainage system, originally built for a sugar mill operated by the Kekaha Sugar Company (KSC), has been controlled and managed by ADC since 2001. Defendant SOF ¶5. The 7000-acres of Mānā Plain land controlled and managed by ADC now contains several operations, including the Pacific Missile Range and various commercial facilities. Defendant SOF 3; Plaintiffs' Motion for Summary Judgment, Dkt No. 51, (Plf. MSJ), at 14. In addition, the town of Kekaha is located in the Mānā Plain. *Id*.

The Mānā Plain borders the Pacific Ocean for approximately nine miles. Plf. MSJ at 8. The adjacent ocean waters are used extensively for recreation, including for fishing and swimming. *Id*., 14. In 2014 and 2018, the Hawai‘i

Department of Health reported to the EPA that the waters in popular beaches in the area were not meeting state water quality standards, threatening the designated uses of the water. *Id.,* Hawai‘i Water Quality Monitoring Report (2014 and 2018), Ex. 37-38.

The CWA and NPDES permits

Except where authorized by a National Pollutant Discharge Elimination System (NPDES) permit, the CWA bans the discharge of pollutants into waters of the United States ("WOTUS"). The NPDES permit system requires regulating, monitoring, and public reporting of pollutants discharged into such waters. 40 C.F.R. §122. The EPA administers the NPDES permit system but authorizes states that meet minimum requirements to stand in its shoes. FAC ¶6 (citing 33 U.S.C. §1342; 40 C.F.R. §23.24). DOH administers the NPDES permitting system in Hawai‘i. Answer, Dkt. No. 18, ¶18.

In 2008, the EPA promulgated the Water Transfer Rule (WTR), which created a new exemption from NPDES permitting requirements where a water transfer activity (WTA) "conveys or connects waters of the United States without subjecting the transferred water to intervening industrial, municipal, or commercial use" and does not add pollutants to the water. 40 C.F.R. §122.3(i).

As the operator of the Mānā Plain drainage ditch system (the System), KSC obtained an NPDES permit, which regulated the discharge of pollutants from the System into the Pacific Ocean. Defendant's Concise Statement in Opposition (Def. Opp. SOF), Dkt No. 68, ¶9. ADC assumed ownership of the System and its NPDES permit in 2001, administratively extending the permit until 2011 when it submitted an NPDES renewal application. Defendant SOF ¶6; FAC ¶60.

In 2015, ADC withdrew its application to renew the System NPDES permit in reliance on the WTR exemption. *Id*. ¶61. As of August 3, 2015, ADC has been without an NPDES permit for the drainage ditch system, which continues to discharge waters into the Pacific Ocean. FAC ¶16; Answer ¶2.

The Pollution

The System collects groundwater and surface waters, including stormwater from ADC's agricultural tenants and stormwater and groundwater containing pollutants from ADC's non-agricultural tenants, and discharges those waters to the nearshore waters of the Pacific Ocean. Plaintiff SOF ¶14. Several of ADC's tenants who sublicense land adjacent to the drainage ditches pollute water that enters the drainage ditch system. *Id*. 17-20. For example, Shredco permits runoff containing pesticides from its green waste material processing operations to

enter the drainage ditch system. Plaintiff SOF ¶18. Another ADC sublicensee, Pohaku, runs a mining and rock crushing operation that emits stormwater runoff, which flows into the System. Plaintiff SOF ¶19.

The Kawai'ele Outfall is the most active of the System's six. Alone, it discharges millions of gallons of water every day from the System into the Pacific Ocean. Plaintiff SOF ¶4. Other System outfalls similarly discharge into the nearshore marine waters within three miles of the coast, occasionally requiring the movement of sand berms by excavator before doing so. *Id.* at ¶¶4, 13. These discharged waters contain sediment and sand from the drainage ditch system, as well as chemicals that seep into the drainage ditch system, including amniomethylphosphonic acid (AMPA), a degradate of glyphosate; dichlorodiphenyldichloroethylene (DDE), a degradate of dichlorodiphenyltrichloroethane (DDT); glyphosate, ametryn, atrazine, bentazon, chlorpyrifos, cispropiconazole, diuron, fipronil, hexazinone, MCPA, metolachlor, prometryn, propoxur, simazine, and trans-propiconazole. *Id*. ¶¶8-9. These waters also contain phosphorus, metals (arsenic, barium, cadmium, chromium, copper, lead, mercury, nickel, silver, zinc), sulfide, phenols, antimony, beryllium, selenium, thallium, and bis-phthalate. *Id*. ¶11.

PROCEDURAL BACKGROUND

On January 16, 2018, Plaintiffs filed a First Amended Complaint (FAC) alleging violations of the CWA and of the public trust by ADC.[1] Dkt. No. 9. On April 3, 2019, Plaintiffs filed a Motion for Summary Judgment (Plf. MSJ). Dkt. Nos. 51-54. On the same day, Defendant filed a Motion for Partial Summary Judgment and Motion to Dismiss (Defendant MSJ). Dkt. Nos. 55-58. These Motions have been fully briefed. Dkt. Nos. 65, 67, 71, 72. On May 5, 2019, Plaintiffs filed a Motion to Strike, for which briefing is also complete. Dkt. Nos. 63, 74, 75. On May 22, 2019, the Court held a hearing on the cross-motions for summary judgment, Defendant's Motion to Dismiss, and Plaintiffs' Motion to Strike. Dkt. No. 77. This disposition follows.

LEGAL STANDARDS

Motion for Summary Judgment

Pursuant to Federal Rule of Civil Procedure 56(a), a party is entitled to summary judgment "if the movant shows that there is no genuine dispute as to any

[1]The FAC also named as a Defendant Hawai'i Department of Health Director, Virginia Pressler. Ms. Pressler has since been dismissed from this action pursuant to this Court's July 2018 Order (Dkt. No. 37) granting Defendant's Motion to Dismiss (Dkt. No. 14).

material fact and the movant is entitled to judgment as a matter of law." The moving party is entitled to judgment as a matter of law when the non-moving party fails to make a sufficient showing on an essential element of a claim in the case on which the non-moving party has the burden of proof. *Celotex Corp. v. Catrett*, 477 U.S. 317, 323 (1986). In assessing a motion for summary judgment, all facts are construed in the light most favorable to the non-moving party. *Genzler v. Longanbach*, 410 F.3d 630, 636 (9th Cir. 2005).

Motion to Dismiss

Federal Rule of Civil Procedure 12 allows a defendant to move for dismissal of a claim on the grounds of, *inter alia*, lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted. Fed.R.Civ.P. 12(b)(1), (6). "Although sovereign immunity is only quasi-jurisdictional in nature, Rule 12(b)(1) is still a proper vehicle for invoking sovereign immunity from suit." *Pistor v. Garcia*, 791 F.3d 1104, 1111 (9th Cir. 2015).[2] A defendant may,

[2]*Cf. Sato v. Orange Cty. Dep't of Educ.*, 861 F.3d 923, 927 (9th Cir.), *cert. denied*, 138 S. Ct. 459 (2017) ("A sovereign immunity defense is 'quasi-jurisdictional' in nature and may be raised in either a Rule 12(b)(1) or 12(b)(6) motion.") (citing *Pistor v. Garcia*, 791 F.3d 1104, 1111 (9th Cir. 2015), and *Eason v. Clark Cty. Sch. Dist.*, 303 F.3d 1137, 1140 (9th Cir. 2002)).

however, be found to have waived sovereign immunity if it does not invoke its immunity in a timely fashion and takes actions indicating consent to the litigation. *See id.*; *Hill v. Blind Indus. & Servs. of Md.*, 179 F.3d 754, 760 (9th Cir.), *amended on denial of reh'g*, 201 F.3d 1186 (9th Cir. 1999).

DISCUSSION

I. Motion for Summary Judgment

Plaintiffs' first count alleges ADC has violated the CWA by discharging pollutants via its drainage ditch system into the waters of the United States without an NPDES permit since August 2015. FAC at 1. Plaintiffs further assert that Nakatani, as director of ADC, ordered ADC to do so. *Id.* Both sides have filed cross-motions for summary judgment on this claim. Dkt. Nos. 51, 55.

ADC asserts that despite the System operating pursuant to an NPDES permit for decades, no NPDES permit is needed now because of the Water Transfer Rule. According to the State, the drainage ditches that comprise the System -- like the Pacific Ocean -- are Waters of the United States (WOTUS), the System pumps at Nohili and Kawai'ele are water transfer activities (WTA), and the WTR exempts WTAs between two WOTUS from NPDES permit requirements. Defendant's Opposition to Plaintiffs' Motion for Summary Judgment (Def. Opp), Dkt. No. 68,

at 19. Plaintiffs do not agree. They respond that (1) the System is not a WOTUS, and the WTR therefore does not apply; (2) the WTR does not apply even if the System transfers water between two WOTUS because pollutants are added to the water during the WTA; and (3) the WTR is invalid. Plaintiffs' Opposition to Defendant's Motion for Partial Summary Judgment, Dkt. No. 65 (Plf. Opp.) at 1-2.

The Court need not reach Plaintiffs' third argument because the first and second are dispositive: the System does not involve transfers between WOTUS and, regardless, the addition of pollutants during the would-be WTA excepts it from applicability of the WTR exemption. Plaintiffs' Motion for Summary Judgment is therefore GRANTED with respect to Count I, and Defendant's Motion for Partial Summary Judgement is DENIED.

A. The CWA Violation

Plaintiffs assert that ADC's discharge of water from the System into the Pacific Ocean meets all five elements of a CWA violation. Plf. MSJ at 23. These five elements include: (1) a discharge (2) of pollutants (3) into navigable waters (4) from a point source (5) without an NPDES permit. *Id*. ADC disputes that element four has been satisfied, arguing that under the applicable definitions, the System is not a point source of pollution but rather a navigable waterway that is

therefore a WOTUS. Def. Opp. at 9-14. As a WOTUS, the System is considered a "donor water," and the pollutants that ADC discharges into the "receiving waters," the Pacific Ocean, are exempt from NPDES permit requirements by the WTR. *Id*., at 19.

Plaintiffs have established, and ADC admits, that ADC discharges water from the System via the Kawai'ele Outfall into the Pacific Ocean. *Id*., at 2. Indeed, ADC discharges millions of gallons of water daily from Kawai'ele. Plf. MSJ at 23 (citing Ex. 31, Kurano Deposition). Several other System outfalls discharge intermittently. Defendant's Motion for Partial Summary Judgment (Def. MSJ), Dkt. No. 55, at 12. Four outfalls "drain into the nearshore marine waters along West Kaua'i by opening sand berms in the outfalls with an excavator." Plf. MSJ at 24 (citing Ex. 34, ADC Standard Operating Procedure). Plaintiffs have easily shown the first element of a CWA violation.

Plaintiffs have also met element two, that the discharged waters contain pollutants. The CWA defines pollutants as, among other things, "chemical waste, biological material… rock, sand…industrial, municipal, and agricultural waste…" 33 U.S.C. §1362(6). Sediment is also a pollutant. 33 U.S.C. §1314(a)(4); *Natural Res. Def. Counc. v. U.S. EPA*, 863 F.2d 1420, 1424 n.4 (9th Cir. 1988).

The System carries groundwater and stormwater runoff through unlined canals and ditches where it gathers sediment and dirt. Plf. MSJ at 25-26 (citing Ex. 21, Bond Decl.) Plaintiffs have also shown that the water in the System contains pesticide residue, heavy metals and toxins.[3] Plf. MSJ at 26-28. ADC's own sampling shows the presence of chlorophyll, nitrogen, ammonia nitrogen, and nitrate-nitrite, which are all pollutants. *Id*., Ex. 33, ADC Daily Monitoring Results. And ADC's own NPDES Renewal Application indicates that the drainage water contains "suspended solids" which are understood to be sediment. *Id.,* NKK004442. Even the groundwater itself that flows into and through the System is considered a pollutant under the CWA because its pH differs from that of the Pacific Ocean into which it discharges. *See Nat. Res. Def. Council, Inc. v. U.S. E.P.A.,* 863 F.2d 1420, 1424 (9th Cir. 1988) (citing 33 U.S.C. § 1314(a)(4)

[3]ADC quibbles with Plaintiffs' characterization of the water quality survey results (Dkt. No. 53, Ex. 40). Def. Opp. SOF ¶1. ADC argues that water quality tests were conducted on water in the drainage ditch near the Kawai'ele Pump Station, rather than in the Pacific Ocean, and therefore do not reflect the resulting level of pollutants in the ocean. *Id*.; Dkt. No. 53, Ex. 19 at 18. However, ADC does not dispute that the water in the drainage ditch is polluted at the levels the State's water quality report indicates nor does ADC dispute that the water, polluted as it is, is discharged into the Pacific. As such, the distinction appears to be of little consequence. Of note, the absence of information regarding levels of pollution at the outfalls is exactly the information vacuum that would be remedied if ADC was required to obtain an NPDES permit.

(1982)). Further, Plaintiffs' expert hydrologist concludes that, because of the structure of System, groundwater flowing to the drainage ditch is likely contaminated with seepage from a nearby landfill and domestic cesspools outside the Mānā Plain. Plf. MSJ at 19. Although ADC challenges the characterization of the extent of the pollution, it does not dispute that the second element of a CWA violation is met.

Third, Plaintiffs assert that the nearshore area of the Pacific Ocean surrounding Kaua'i is a navigable waterway and is protected under the CWA. *See* 33 U.S.C. §§1362(7-8). Notably, the polluted water discharges from the drainage ditch into the Pacific Ocean in an area containing popular beaches used for water recreation, including Barking Sands Beach and Kekaha Beach Park. Plf. MSJ at 14. The third element is therefore also met.

It is undisputed that, since 2015, ADC has been without an NPDES permit for its discharge of waters from the System into the Pacific Ocean. Def. MSJ at 4; Answer ¶¶2, 7. Element five has therefore also been met.

B. The System Is Not a WOTUS

The parties disagree on the fourth element of a CWA violation, which requires a point source of pollutants. Under Plaintiffs' theory, the System is a

point source of pollution. Plaintiffs assert that "the System and its outfalls fall under the express definition of 'point source' because they are 'discernible, confined and discrete conveyance[s],' and are 'ditch[es] [or] channel[s],' which the Clean Water Act expressly defines as point sources." Plf. MSJ at 31 (quoting 33 U.S.C. §1362(14)). Forty years of NPDES permitting support Plaintiffs' assertion that the System is a point source of pollution.

Under ADC's theory, the System is not a point source of pollution. ADC asserts that, notwithstanding the decades of classifying the System as a point source, the proper classification of the System is as a WOTUS or jurisdictional water under 40 C.F.R. §122.2. Specifically, ADC asserts that, based on an EPA consultant's determination, the water in the drainage ditch system should be considered a protected WOTUS, rather than a point source of pollutants into the ocean. Def. Opp. at 14 (citing Hayes Decl. ¶24-25).[4] ADC explains that, because there is no longer a single point source of industrial pollution (the KSC sugar mill) entering the drainage ditch system, the drainage ditch is now properly treated as its own protected waterway under the CWA. Thus, in ADC's view,

[4]Plaintiffs have moved to strike the Hayes Declaration.

some of ADC's sublicensees' activities may be point sources of pollution requiring NPDES permits,[5] but the System itself is not a point source of pollution to the ocean. According to ADC, Hawai'i DOH agreed and, following ADC's consultant's direction, reclassified the System as a "receiving water" that should be considered a "state jurisdictional water" such that industrial point-source pollution should be regulated as it enters the System.[6] Def. Opp. SOF ¶9; Def. Opp. at 5.

This reclassification of the System from a point source to a WOTUS is suspect for several reasons. First, treating the drainage ditch system as a WOTUS or jurisdictional water does not comport with the history of the System's use and regulation. Second, the change in how the System is classified is not justified by any intervening change in law or relevant change in circumstances. Third, the reclassification of the System as a WOTUS undermines the purpose of the CWA.

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[5]Under the CWA, agricultural irrigation return flows do not qualify as a point-source of pollution. CWA §402(1)(1-2); CWA §502(14). Thus, many of ADC's tenants do not require NPDES permits for the pesticide-laden runoff that enters the ditch system. Plaintiffs argue that mixed with this agricultural runoff is industrial stormwater runoff that does require a permit. Plaintiff SOF ¶18. Plaintiffs, for instance, allege that Pohaku is an industrial point source and the HDOH has required them to obtain an NPDES permit, which they have failed to do. *Id.* ¶19. That dispute need not be resolved here.

[6]Plaintiffs dispute whether Hawaii DOH has in fact made that determination and, if it has, whether the determination is even proper for consideration here. Plf. Reply at 6.

The history and use of the System indicate an origin, role and purpose entirely different from those waterways protected under the CWA. The drainage ditches were built to create agricultural land from a previously existing wetland. Defendant SOF ¶¶2-4. This System was created, in other words, so that KSC could use the land to produce sugar. The canals and water pumps were used to carry the drained water to the Pacific Ocean so that the polluted water would not stand in or overflow the ditches. *Id.*

For decades, the System was regulated as such. During the many decades of the existence of the drainage ditches and water pumps draining polluted water from the Mānā Plain into the Pacific Ocean, KSC obtained NPDES permits for the System. Plf. MSJ at 20. Those NPDES permits regulated the discharge of the System's waters *into the ocean*.[7] Def. Opp SOF. ¶9. KSC, as operator of the System, was not required to regulate its discharge of pollutants at the point at which they entered the drainage ditch system. *Id.* The history of permitting indicates that the System was viewed as a means of transporting polluted discharge

[7]Defendant's Statement of Facts here relies on the Hayes Declaration which Plaintiffs moved to strike. However, the basis of the Motion to Strike is not this fact and in any case the Motion to Strike is moot.

into the Pacific Ocean and was viewed in its totality as the point source of pollution, not as a protected, navigable waterway. Recognizing the System for what it is—a series of drainage ditches carrying polluted waters—the State regulated the point at which the System discharged into the waterway the State *did* seek to protect: the Pacific Ocean.

Nothing about the subsequent change in ownership in 2001 from KSC to ADC indicates that the System, which has remained structurally unchanged, should now suddenly be treated as a WOTUS, navigable waterway, or jurisdictional water. Nothing about the structure of the drainage ditches, canals and water pumps has changed since ADC took over from KSC as the operator of the System.

What has changed is the use of the surrounding land, with the proliferation of sources of pollution from one company (KSC) to many companies as sublicensees of KSC's successor (ADC).[8] But this change in land use and owner does nothing to change the structure of the System itself. Just as was the case during KSC's operational years, some of the surrounding businesses (now ADC's

[8]Notably, even during the time of KSC's operation of the System, various commercial uses of the land surrounding the System already existed. Defendant SOF ¶3.

sublicensees) may not add pollutants to the System, some may add pollutants to the System via exempt means (such as agricultural irrigation return flow), and some may add pollutants through non-exempt means (such as industrial runoff from Pohaku and, previously, KSC). But the nature of ADC's use of the land (through its sublicensees) has not changed the nature of the System and therefore provides no logical support for reclassifying the System from a point source of pollution to a WOTUS.

ADC argues that its classification of the System as a WOTUS is supported by state and federal law. Citing to the CWA and various cases, ADC varyingly argues that the drainage ditches are "canals," "navigable waters," and "tributaries," and that they have a "significant nexus" to jurisdictional waters, such that they are themselves WOTUS. Def. Opp. 12-17. ADC also asserts that the State has classified the System as a State Water and argues that such classification in the State translates into a classification of the System as a WOTUS under the CWA. Def. MSJ at 8-9. Plaintiffs dispute whether the System satisfies any of the definitions of WOTUS offered by ADC. Plaintiffs' Reply in Support of Motion for Summary Judgment (Plf. Reply), Dkt. No. 71, at 3-5. Citing extensive case law, Plaintiffs argue that the groundwater drawn into the System precludes

classification as a WOTUS and that the State's capacious definition of a State Water is inconsequential to the federal definition of a WOTUS. *Id.*

The Court need not resolve the ultimate question of whether the drainage ditch system operated here could ever be classified as a WOTUS because, while the law, as cited by ADC, may allow certain drainage ditch systems to be considered WOTUS, it does not require the Court to disregard how this System has historically been classified and regulated, and what it, in fact, is: a means to convey and discharge polluted water into the Pacific. In more than forty years of NPDES regulation, the System has never been treated as a WOTUS. In the several decades of NPDES regulation, no effort was ever made to regulate the level of pollution entering the System, as would be required if it were a WOTUS under the CWA; no effort was made to keep the System's waters in a usable condition either. The cases and statutory definitions cited to by ADC that indicate a system of drainage ditches *could be* a WOTUS predate ADC's first application to renew the System NPDES permit, such that those definitions could have been relied upon to argue for the System to be treated as a WOTUS. *See* Def. Opp. at 9-17 (citing *Headwaters, Inc. v. Talent Irrigation Dist*., 243 F.3d 526, 533 (9th Cir. 2001); *North Carolina Shellfish Growers Assoc v. Holly Ridge Assocs.,* LLC., 278

F.Supp.2d 654, 672 (2003). Yet neither ADC nor Hawai‘i DOH ever sought to do so, and indeed, ADC's withdrawn NPDES renewal application can easily be viewed as advancing the same position on the applicability of the CWA as that advanced by Plaintiffs here. *See* ADC NPDES Renewal Application, February 25, 2011, Dkt. No. 53-4.

No intervening change in the WOTUS definition warranted ADC and Hawai‘i DOH's efforts to reclassify the System either. The only arguably relevant regulatory change that did occur was the promulgation of the EPA's WTR in 2008, which exempts polluted waters transferred into a receiving WOTUS from requiring an NPDES permit, *but only if the donor water is itself a WOTUS*. Plf. Reply at 8 (citing 40 C.F.R. 122.3(i) ("water transfer means activity that conveys or connects water of the United States[…]")). The State's reclassification of the System as a WOTUS seeks solely to take advantage of the WTR exemption. The reclassification, in other words, appears opportunistic, rather than factually based, especially where, as here, ADC seeks to twist a law intended to protect waterways to do exactly the opposite.

Importantly, it is Defendant's burden to show that its pollutant-laden discharge from the System falls under an exemption to the CWA. *See N. Cal.*

River Watch v. City of Healdsburg, 496 F.3d 993, 1001 (9th Cir. 2007), cert. denied, 552 U.S. 1180 (2008) (burden on polluter to prove applicability of regulatory exemption from "waters of the United States"); *United States v. Akers*, 785 F.2d 814, 819 (9th Cir.), cert. denied, 479 U.S. 828 (1986) (the burden falls on the polluter to prove its activities are statutorily exempt from Clean Water Act Section 404, 33 U.S.C. § 1344). ADC's unfounded claim that the System has suddenly changed from a point source of pollution to a WOTUS without any intervening changes to the definition of a WOTUS, to the interpretation of the definition, or to the physical structure or function of the System itself, does not satisfy this burden.

Finally, ADC offers that "HDOH's determination that the Canals are the receiving Jurisdictional Water" cannot be contradicted here without bringing suit against HDOH. Def. Opp. at 17-18. ADC's argument relies on a convoluted interpretation of Plaintiffs' claims, treating Plaintiffs' argument that no exemption to the NPDES permit requirement applies as a challenge to the State's law defining State jurisdictional waters. Plaintiffs make no such challenge to the State's laws, and the Court need not address such a hypothetical.

Moreover, the potential conflict between the instructions and demands of State permitting authorities and this Court's Order suggested by ADC are not proper for consideration here. This Court is not limited in its authority to evaluate CWA violations by the State's laws. *Ass'n to Protect Hammersley, Eld, & Totten Inlets v. Taylor Res., Inc*., 299 F.3d 1007, 1012 (9th Cir. 2002). While an agency determination is ordinarily afforded deference in some circumstances, ADC has nowhere shown an EPA determination at all—rather, ADC has suggested what the EPA's views might be via ADC's reliance on a contractor's opinion. Plf. Reply at 7; Def. Opp at 4 ("the contractor's assessment was that an NPDES permit was no longer necessary, as there was no longer an industrial point source discharging."). If the State's interpretation of its own laws create a conflict with CWA jurisprudence, or the EPA later makes a determination about the need for an NPDES permit, and those determinations put ADC in an impossible position, that conflict can be resolved by ADC at a later time.

C. The WTR Does Not Apply Because of the Added Pollutant Exception

Building on the unsound premise that the System is a WOTUS, ADC argues that "any discharge from the Canals into the Pacific Ocean is a water transfer from Jurisdictional Water into another. By definition, this activity does not require a

NPDES permit." Def. Opp. at 4 (relying on the EPA's WTR). According to the State, the WTR, codified at 40 C.F.R. §122.3, allows transfers of water from one WOTUS to another without an NPDES permit, even where it might transfer "the most loathsome navigable water in the country into the most pristine one." Def. Reply at 10 (quoting *Friends of Everglades v. S. Fla. Water Mgmt. Dist*., 570 F.3d 1210, 1226 (11th Cir. 2009).

However, even assuming, *arguendo*, that the System and the Pacific Ocean into which it discharges are both WOTUS, the transfers at issue here are not exempt under the WTR because *pollutants are added during the transfer*. 40 C.F.R. §122.3(i)(the water transfer exclusion "does not apply to pollutants introduced by the water transfer activity itself to the water being transferred.").

Here, it is uncontested that the System's "forty miles of unlined, earthen drainage ditches add pesticide-laden sediment to the transferred waters…" Plf. Opp. at 2; Answer ¶16; Plaintiff SOF ¶¶7-8;[9] Dkt. No. 53 (Plf. Ex. 25: ADC

[9]Although ADC disputes SOF ¶¶7-8, it does so only to the extent that the statements suggest that the samples taken from the drainage ditches surrounding the outfalls, which show the presence of pesticides, were actually taken from the Pacific Ocean. Def. Opp SOF ¶1. These facts are here used only to support the assertion that the drainage ditches themselves add pesticide-laden sediment to the water. ADC did not object to the statement that "the discharge waters contain sediment from the banks and bottoms of the Mānā Plain Drainage Ditch System." Plaintiff SOF

NPDES Permit Renewal Application (Feb. 25, 2011) at NKK004444-NKK00444540; Ex. 39: Alfredo Lee Letter (Nov. 28, 2011) at ADCID000143-ADCID000174, ADCID000179-ADCID000180, ADCID000190-ADCID000191; Ex 40: Statewide Pesticide Sampling Project, at NKK000215); Dkt. No. 52 (Bond Decl. ¶¶140-145; Ex. 21: Erosion Images); First Amended Complaint ¶74. ADC instead argues that the proper conception of the water transfer activity is not to look at the entire System, including those forty miles of unlined ditches through which pollutants are added, but rather to focus on the two pumps at Kawai‘ele and Nohili. Def. Reply at 11-12. Based on this conception of the WTA, ADC argues that the proper inquiry is whether those pumps add pollutants to the transferred water. *Id.* ADC asserts they do not. *Id.*

ADC has the burden of proving that it is eligible for an exemption to the CWA. *United States v. First City Nat'l Bank of Houston*, 386 U.S. 361, 366 (1967) (holding that a party claiming an exception must prove that they acted within the exception). Further, the Court must narrowly construe "claims of an

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¶7. Moreover, in its Answer, ADC admits to FAC ¶74, which states that, "ADC [] self-reported testing results to DOH on or about November 28, 2011. The testing results show the presence of [numerous pollutants] at the Nohili Outfall and Second Ditch." *See* Answer ¶16.

exemption, from the . . . permitting requirements of the [CWA's] broad pollution prevention mandate . . . to achieve the Act's purpose." *N. California River Watch v. City of Healdsburg,* 496 F.3d 993, 1001 (9th Cir. 2007).

Plaintiffs argue that the ditches, the water pumps that draw water through these ditches and pump it into the Pacific Ocean, and the excavation of the sand berms that allows water to flow into the Pacific Ocean should all be viewed collectively as the water transfer activity. Plaintiffs here rely on the plain language of the statute describing a WTA as an "engineered activity" to argue that ADC has failed to establish that the entire engineered System should not be considered part of the WTA. In furtherance of that argument, Plaintiffs have shown via expert testimony, and ADC does not dispute, that the unlined ditches were purposefully built below the natural water table at Mānā Plain to draw water from the surrounding wetlands into the ditches, and the pumps at the end of these ditches then draw that water from throughout the forty-mile system into the Pacific Ocean. And because these miles of "unlined, earthen canals" are "integral parts of the [WTA]" and the "unvegetated and unstable banks are sources of detached sediment […] contaminated with pesticides[…,]" that System is not an exempt WTA because it adds pollutants. Plf. Opp. at 14-17. Plaintiffs' construction is

surely the proper, and, indeed, the only sensical one. The pumps focused on by the State have no water to draw, move, or ultimately discharge without the ditches purposefully built to first collect that water. That logically leads to the conclusion that the entire System represents the water transfer activity, not the pumps studied in isolation.

Certainly, ADC offers citations to ambiguous regulatory language in which the EPA refers to a water transfer "facility" or "structure" to suggest that the EPA itself intended the term WTA to apply only to an *isolated* structure. Def. Reply at 12 (quoting *National Pollutant Discharge Elimination System (NPDES) Water Transfers Rule*, 73 FR 33697-01, at 33704.). If that were true, the regulation at Section 122.3, or elsewhere, could have said so. It strains credulity, however, to interpret a water transfer activity to mean only a pump or other single structure when the "engineered activity" clearly involves much more than that.

Moreover, as ADC itself identifies, in promulgating the WTR, the EPA described a WTA, stating, "[t]ypically water transfers route water through tunnels, channels, and/or natural stream water features, *and* either pump or passively direct it for uses such as[…] flood control." Def. Opp. at 20 (quoting Federal Register, vol. 73- 115, at 33697 (June 13, 2008)) (emphasis added). The structure of the

sentence suggests that the channels through which water passes and the pumps that move and discharge it are *collectively* considered the water transfer. There is nothing in the language of the rule or EPA's explanation of the rule that suggests the forty miles of unlined ditches and canals at issue here should be excluded from consideration as part of the WTA. In fact, the rule appears to contemplate those exact structures, to include pumping stations, pipes, canals and other structures "used solely to facilitate the transfer of water," as WTAs. *Id*. at 33704

The sole case upon which ADC relies for its crabbed view of the WTA is a non-controlling Eleventh Circuit case applying the WTR. Def. Reply at 12. In *Friends*, the court was similarly faced with a system of canals and a water pump facility pumping polluted water into Lake Okeechobee. *Friends of Everglades v. S. Fla. Water Mgmt. Dist.,* 570 F.3d 1210, 1222 (11th Cir. 2009). ADC relies on *Friends* to argue that the pumps alone are the WTA because the canals that were part of the system in *Friends* were treated as WOTUS, such that the only activity transferring water between two WOTUS—and therefore the only WTA at issue—were the pumps. But nothing in the holding in *Friends* indicates that the court there was asked to parse the meaning of a "water transfer activity" or to determine whether the canals were WOTUS. Indeed, in *Friends,* the court stated, "it is

undisputed that . . . Lake Okeechobee *and the canals* are 'navigable waters." *Id*. at 1216 (emphasis added). In light of that undisputed fact, the court's treatment of the canals as the donor WOTUS and the pumps as the WTA is of little assistance in defining the proper limits of the WTA under the circumstances presented here. Here, unlike in *Friends,* the status of the ditches as WOTUS is heavily disputed. And nothing in the opinion suggests that the history or structure of the system of canals and pumps in *Friends* resembles the System here, such that it can readily answer the question of whether the ditches are properly considered WOTUS or part of the WTA (or both). ADC has provided no Ninth Circuit case law to support its proposed interpretation of the WTA to exclude the pollutant-adding canals and drainage ditches.

With competing definitions of WOTUS and WTA, and little authority cited to offer guidance, the Court cannot find that ADC has satisfied its burden of proving that an exemption applies under the WTR. Because the ditches are logically considered part of the WTA, and because they add pollutants during the transfer activity, the WTR does not exempt the discharge from the System into the Pacific Ocean from NPDES permit requirements.

D. Conclusion

The parade of horribles ADC sets forth is unmoving. ADC claims that "should the water transfer cease, the Mānā Plain would be inundated with water, causing extensive adverse effects to the Pacific Missile Range Facility, Kekaha town residences and commercial businesses, and agriculture and other uses on the Plain." Def. Opp. at 3. Of course, Plaintiffs do not ask the Court to enjoin ADC's discharge of water from the System; they ask only that the Court require ADC to obtain an NPDES permit to do so. Flooding of the Mānā Plain and military sites is not the proximate outcome of a requirement that ADC resume its efforts to obtain permits for the activities it previously conducted under NPDES requirements. Rather, ADC's compliance with NPDES permitting requirements will generate more data gathering and facilitate additional public scrutiny of its water discharges, as was the case prior to 2015.

There is no question that ADC discharges polluted water into the near-shore waters of the Pacific Ocean off Kauai's western coast on a daily basis via the Mānā Plain drainage ditch system, and that it does so without an NPDES permit. It is undisputed that the water discharged contains various pesticides and agricultural chemicals, byproducts of agricultural chemicals, and heavy metals, as well as

sediment from the unlined canals through which it passes. It is further undisputed that these pollutants include those from which the CWA seeks to protect waterways and that the near-shore waters of the Pacific Ocean are protected under the CWA. Thus, no material facts remain in dispute. *See Celotex Corp. v. Catrett*, 477 U.S. 317, 323 (1986). The undisputed facts show that each of the five elements of a CWA violation are present. The undisputed facts also show that the WTR does not apply to exempt the State's conduct from the application of the CWA because pollutants are added to the water flow during the transfer.

The Court GRANTS Plaintiffs' Motion for Summary Judgment on Count I and DENIES Defendant's Counter-Motion on the same.

II. Motion to Dismiss

In Count II, Plaintiffs allege that the same conduct on which their CWA claim is based also amounts to the State's violation of its public trust duties under the Hawai'i State Constitution, Article XI; Hawai'i Revised Statutes ("HRS") § 342D-4; and Hawai'i Administrative Rules ("HAR") § 11-54-1.1(b). Plaintiffs move for summary judgment on this Count, arguing that "ADC has violated and continues to violate its public trust duties… by failing to conserve and protect the nearshore marine waters along West Kaua'i." Plf. MSJ at 43. ADC moves to

dismiss this claim for lack of subject matter jurisdiction. Def. MSJ at 13. It argues that because "Plaintiffs have cited to no federal laws or regulations to support their [public trust] claim," ADC has immunity in this Court "under the Eleventh Amendment and the principles of sovereign immunity." *Id.*

Plaintiffs do not contest the applicability of the Eleventh Amendment to their state-law claims against ADC. Instead, they assert that ADC expressly waived this defense by not moving to dismiss this count sooner and by "admitting that so long as Plaintiffs' federal claims remain pending, this Court has pendent jurisdiction over Plaintiffs' public trust claim." Plf. Opp. at 35.

The application of the Eleventh Amendment and principles of sovereign immunity to Plaintiffs' state-law breach of public trust claim against Nakatani in his official capacity is not reasonably disputed. Because the Court determines that Nakatani has neither expressly waived the defense of sovereign immunity nor implicitly waived it based upon his conduct in this matter, Defendant's Motion to Dismiss Count II is GRANTED. Plaintiffs' Motion for Summary Judgment as to this Count is DENIED.

A. Relevant Procedural Background

On January 16, 2018, Plaintiffs filed their FAC, naming Nakatani in his official capacity as Director of ADC and Virginia Pressler in her official capacity as Director of DOH. Dkt. No. 9. The FAC included three causes of action: (1) CWA and HRS § 342D-50(a) claims against Nakatani; (2) a breach of public trust claim against Nakatani; and (3) a breach of public trust claim against Pressler. FAC ¶¶28- 29. Pressler moved to dismiss Plaintiffs' sole claim against her for public trust violations under state law, based upon the State's sovereign immunity. Dkt. No. 26. Nakatani joined in Pressler's motion. Dkt. No. 32. On July 13, 2018, the Court granted Pressler's Motion to Dismiss Count III. Dkt. No. 37. On April 3, 2019, after the completion of discovery, ADC filed a Motion to Dismiss Count II. Dkt. No. 54.

B. Sovereign Immunity Bars State Law Claims Against ADC in Federal Court

The Eleventh Amendment provides that "[t]he Judicial power of the United States shall not be construed to extend to any suit in law or equity, commenced or prosecuted against one of the United States by Citizens of another State, or by Citizens or Subjects of any Foreign State." U.S. Const. amend. XI. "A State

may waive its sovereign immunity at its pleasure, *College Savings Bank v. Florida Prepaid Postsecondary Ed. Expense Bd.*, 527 U.S. 666, 675–676 (1999), and, in some circumstances, Congress may abrogate it by appropriate legislation. But absent waiver or valid abrogation, federal courts may not entertain a private person's suit against a State" or its agent sued in his or her official capacity. *Virginia Office for Prot. & Advocacy v. Stewart*, 563 U.S. 247, 253–54 (2011) (footnote omitted).

Here, the Eleventh Amendment immunizes Nakatani, a state official sued in his official capacity, from state law claims brought in this court. *Will v. Michigan Dep't of State Police*, 491 U.S. 58, 66 (1989); *Pennhurst State Sch. & Hosp. v. Halderman*, 465 U.S. 89, 100 (1984); *Sato v. Orange Cty. Dep't of Educ*., 861 F.3d 923, 928 (9th Cir. 2017). *See* FAC ¶8 ("James Nakatani, in his official capacity as Director Agribusiness Development Corporation [is] breaching [his] public trust duties to conserve and protect water resources, including nearshore marine and inland waters, under article XI, §§ 1 and 6 of the Hawai'i Constitution."). Thus, to the extent Plaintiffs seek declaratory and/or prospective injunctive relief via

their state-law claims against Nakatani, those claims are barred by the Eleventh Amendment, and no exception applies.[10]

C. The State Has Not Waived Sovereign Immunity

Plaintiffs do not contest the initial application of sovereign immunity to Count II. However, they contend that the State waived any such defense through litigation conduct that was incompatible with an intent to preserve that immunity. The Ninth Circuit explains that "Eleventh Amendment immunity is an affirmative defense that must be raised 'early in the proceedings' to provide 'fair warning' to the plaintiff." *Aholelei v. Dep't of Pub. Safety*, 488 F.3d 1144, 1147 (9th Cir. 2007) (quoting *Demshki v. Monteith*, 255 F.3d 986, 989 (9th Cir. 2001) (quoting *Hill v. Blind Indus. & Servs. of Md*., 179 F.3d at 761), *amended by* 201 F.3d 1186 (9th Cir. 2000)) (internal citation omitted). Because such immunity is an affirmative defense, it can be waived. *Id*. "The test employed to determine

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[10]Under the *Ex Parte Young* doctrine, *see* 209 U.S. 123 (1908), a federal court may enjoin a state official's future conduct when a plaintiff brings suit alleging a violation of federal law, *Edelman v. Jordan*, 415 U.S. 651, (1974), but not where, as here, a plaintiff alleges a violation of state law. *Pennhurst*, 465 U.S. at 106 (stating that "when a plaintiff alleges that a state official has violated state law," then "the entire basis for the doctrine of *Young* ... disappears"); *see also McNally v. Univ. of Hawaii*, 780 F. Supp. 2d 1037, 1056 (D. Haw. 2011) (discussing *Ex Parte Young* doctrine).

whether a state has waived immunity 'is a stringent one.'" *In re Bliemeister*, 296 F.3d 858, 861 (9th Cir. 2002) (quoting *In re Mitchell*, 209 F.3d 1111, 1117 (9th Cir. 2000)). "A state generally waives its immunity when it 'voluntarily invokes [federal] jurisdiction or . . . makes a 'clear declaration' that it intends to submit itself to [federal] jurisdiction.'" *Id*. (quoting *In re Lazar*, 237 F.3d 967, 976 (9th Cir. 2001)) (alterations in original). "Express waiver is not required; a state 'waive[s] its Eleventh Amendment immunity by conduct that is incompatible with an intent to preserve that immunity.'" *Id*. (quoting *Hill*, 179 F.3d at 758).

Plaintiffs offer two justifications for their waiver argument. Neither is persuasive. The State did not sit on its Eleventh Amendment rights, wait until late in the proceedings, or act in a manner inconsistent with an intent to preserve its sovereign immunity. Nor has the State made a clear declaration or otherwise conducted itself in a way to cause anyone to reasonably believe that it intends to submit to federal jurisdiction with respect to Plaintiffs' state-law claims. Plaintiffs' assertions to the contrary are unsupported.

First, the waiver arguments set forth by Plaintiffs here are nearly identical to those set forth in opposition to Pressler's Motion to Dismiss, which this Court

granted. Dkt. No. 37. The analysis here does not differ and need not be repeated.

Next, Plaintiffs argue that ADC waived its sovereign immunity defense by waiting to file a Motion to Dismiss ten months after the Court granted Pressler's motion on the same grounds. Plf. Opp. at 36. However, in his Motion for Joinder in Pressler's Motion to Dismiss, Nakatani stated that he would be filing a similar motion regarding the state law claims against him in this case. *Id*. (citing Dkt. No. 32). There is no unfair delay here because Plaintiffs had ample notice of Nakatani's intent to file the Motion now before the Court.

Moreover, the Court notes that Ninth Circuit case law reflects a clear aversion to finding waiver based on an assertion that sovereign immunity was invoked too late in a proceeding. Specifically, in *Ashker v. Cal. Dep't of Corr.*, 112 F.3d 392, 394 (9th Cir. 1997), the Ninth Circuit concluded that a sovereign immunity defense had not been waived because it had been raised in the defendants' answer and pretrial statement, even though the defendants did not otherwise litigate the defense in the district court, litigating it for the first time on appeal. *Ashker* is not an anomaly either. In *Gamboa v. Rubin*, 80 F.3d 1338, 1350 (9th Cir. 1996), *vacated on other grounds as recognized in Hill v. Blind*

Indus. & Services of Md., 179 F.3d at 763, the State of Hawai‘i raised the defense of sovereign immunity only in its answer, and then proceeded to litigate the substance of the case before the district court by filing a motion for summary judgment. The Ninth Circuit, in particularly definitive language, concluded that the State had not waived the defense of sovereign immunity, stating: "That Hawai‘i did not raise the issue in the district court except in its answer does not amount to a waiver of immunity." Here, even prior to this Motion to Dismiss, ADC raised its sovereign immunity defense as the "Third Affirmative Defense" in its Answer, stating, "Plaintiffs' claims are barred against ADC under the doctrine of sovereign immunity." Answer ¶31. Another Ninth Circuit case, *Hill v. Blind Indus. & Services of Md.*, 179 F.3d at 763, is equally instructive. In *Hill*, the Ninth Circuit concluded that sovereign immunity *had been waived, but only* because the defense was raised for the first time on the opening day of trial. *Id*. at 763. The defense had never been raised, not even in an answer, prior to that time. Under these far from demanding standards, ADC's sovereign immunity defense is timely.

Further, ADC neither voluntarily invoked federal jurisdiction nor made a "clear declaration" that it intended to submit itself to federal jurisdiction. *Cf. Lapides v. Bd. of Regents of Univ. Sys. of Ga*., 535 U.S. 613, 624 (2002) (holding a

state waived its Eleventh Amendment immunity by removing the case to federal court). Contrary to Plaintiffs' assertion, ADC's statement in its answer that "this Court may exercise supplemental jurisdiction *only if* Plaintiffs' CWA claims remain pending" is not an express waiver of immunity or invocation of federal jurisdiction. Answer, Dkt. No. 18, ¶14. Instead, it is an indication that ADC acknowledged only a limited basis for this Court's jurisdiction. Under these circumstances, the Court will not infer a waiver of sovereign immunity where the facts indicate precisely the opposite intent, based upon the State's conduct in this litigation.

The Motion to Dismiss based on sovereign immunity is timely, and the State neither expressly nor impliedly waived that defense at any time. The Motion to Dismiss Count II is therefore GRANTED.

CONCLUSION

For the foregoing reasons, Plaintiffs' Motion for Summary Judgment is GRANTED IN PART with respect to Count I (violation of the CWA) and DENIED IN PART as to Count II (state-law violation of public trust). Defendant's Motion for Partial Summary Judgment on Count I is DENIED. Pursuant to the Eleventh Amendment and principles of sovereign immunity,

Defendant is immune from suit in this court with respect to the breach of public trust claims, and Defendant's Motion to Dismiss Count II is therefore GRANTED. Plaintiffs' Motion to Strike is DENIED as moot.

IT IS SO ORDERED.

DATED: July 9, 2019 at Honolulu, Hawai'i.

Derrick K. Watson
United States District Judge

Scoping Comment Letter 0009

Jordan Lemke <jlemke2015@yahoo.com>
Comments on Proposed Use of State Lands in Kōke'e
To info@PMRF-KPGO-EIS.com **Reply To** Jordan Lemke

5/24/2024 5:39 PM

Aloha,

Mahalo for allowing the opportunity to provide comments on the proposed use by the Navy and NASA of 8,371 acres on Kaua'i.

Upon further review of the Environmental Impact Statement Preparation Notice, I offer the following comments;

We do not have enough ʻāina to be awarding nearly 8,500 acres to the Navy and NASA. The lease rate is abhorrent and if the real estate action is approved, should come at a much higher price. Lessons learned from Red Hill, Kaho'olawe, and Mākua Valley should not be ignored when considering this "real estate action".

The continued military presence in Hawai'i does not at all offer a sense of protection to residents. Ask anyone living in Aiea on O'ahu if they feel safer knowing the military is storing jet fuel in their pu'u's. Ask residents of Kaua'i if they feel safer knowing ordnance's are being stored in our pali's.

Section 1.3.3 states - On Kaua'i, the Navy is the largest high-tech employer and third largest overall employer. It employs approximately 900 military and civilian personnel and contributes approximately $150 million annually in salary, contract goods, and services to the local economy. Moreover, as described in Section 1.3.6, Environmental Management and Stewardship, the Navy actively manages the natural and cultural resources at PMRF for the leased and easement lands.

The poor choice of Hawai'i leaders to continue to rely on tourism and the military complex as its main source of income is not something to ride home about. The COVID-19 pandemic proved the tourism point in spades. The deadly fires in Maui on August 8 left residents wondering what exactly it was that the military did to support that situation. The National Guard had to be flown in before any real aid was offered despite having thousands of military personnel already here. Again, Red Hill, Kaho'olawe, and Mākua Valley are all prime examples of how the military are not good ʻāina stewards.

Section 1.4 states - By ensuring continued Navy and NASA operations on Kaua'i, the real estate action would also preserve local jobs and income for the residents of Kaua'i, financially contribute to the overall economic wellbeing of Kaua'i, and maintain continued conservation management of natural and cultural resources on State lands at no cost to the State of Hawai'i.

How does this real estate action contribute to the overall economic well-being of Kaua'i? I wonder if residents really feel as though their well-being is improved by the over-presence of the military in the pae ʻāina?

Lastly, the most appropriate stewards of ʻāina are the ones who have generational ties to this ʻāina. Not the Navy, nor NASA. As modern-day colonizers of these islands, we as haoles need to recognize that the appropriate people to be informing us on how to steward ʻāina are the Kānaka ʻŌiwi. Rather than the Navy or NASA being the leaseholders, why not designate these lands as conservation lands and ensure perpetual public access? It seems aloof and albeit arrogant, for the Navy and NASA to be under the impression they are the highest and best landowners for these spaces.

Mahalo for allowing the public to comment. It would be a shock to me if this real estate action did not get approved as the corruption in this state, and especially Kaua'i county is rampant. But know, the residents are watching and our patience is running very thin with the status quo.

Jordan Loudon
Wailua Homesteads Resident

Scoping Comment Letter 0010

Consent for storing submitted data
True

First Name
Inette

Last Name
Miller

Add Me to the Project Mailing List
Yes

Street
POB3561

City
Lihue

State
HI

Zip code
96766

Email
Inette.Miller@outlook.com

Organization/Affiliation (if any)
The Return Voyage

Comments

No Action Alternative.

Add Attachments (optional)

Submitted on
05/24/2024

Scoping Comment Letter 0011

Consent for storing submitted data
True

First Name
Iokepa

Last Name
Imaikalani

Add Me to the Project Mailing List
Yes

Street
4471B Kai Ikena Drive

City
Kalaheo

State
HI

Zip code
96741

Email
Iokepa@ReturnVoyage.com

Organization/Affiliation (if any)
The Return Voyage

Comments
No action alternative.

Add Attachments (optional)

Submitted on
05/24/2024

Scoping Comment Letter 0012

Timothy Chee <timothy.chee@hawaii.gov> 5/30/2024 3:22 PM

EIS Preparation Notice for Pacific Missile Range Facility and Kōke'e Park-LD0501

To Info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> Copy Kevin E Moore <kevin.e.moore@hawaii.gov> • Timothy Chee <timothy.chee@hawaii.gov>

Aloha

Please see the attached reply from the Department of Land and Natural Resources.

Mahalo
Timothy Chee
Land Agent

- REPLY WITH COMMENTS -LD0501-KAUAI PACIFIC MISSILE RANGE EIS NOTICE V.2.pdf (1 MB)

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

May 30, 2024

LD 0501

Cardno GS-AECOM Pacific Joint Venture
Attention: Michele Lefebvre
737 Bishop Street
Suite 3050
Honolulu, HI 96813

Via email: info@PMRF-KPGO-EIS.com

SUBJECT: **EIS Preparation Notice for Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Action, Kekaha and Waimea Districts, Island of Kauai, Hawaii, TMK: Various**

Thank you for the opportunity to review and comment on the subject project. The Land Division of the Department of Land and Natural Resources (DLNR) distributed copies of your request to DLNR's various divisions for their review and comment.

Enclosed are comments received from our Engineering Division. Should you have any questions, please feel free to contact Timothy Chee via email at *timothy.chee@hawaii.gov*. Thank you.

Sincerely,

Russell Tsuji

Russell Y. Tsuji
Land Administrator

Attachments
cc: Central Files

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

May 8, 2024

LD 0501

MEMORANDUM

FROM: ~~TO:~~ **DLNR Agencies:**

X Div. of Aquatic Resources *(via email: kendall.l.tucker@hawaii.gov)*
X Div. of Boating & Ocean Recreation (*via email: richard.t.howard@hawaii.gov)*
X Engineering Division *(via email: DLNR.Engr@hawaii.gov)*
X Div. of Forestry & Wildlife *(via email: Rubyrosa.T.Terrago@hawaii.gov)*
X Div. of State Parks (curt.a.cottrell@hawaii.gov)
X Commission on Water Resource Management *(via email: DLNR.CWRM@hawaii.gov)*
X Office of Conservation & Coastal Lands *(via email:Sharleen.k.kuba@hawaii.gov)*
X Land Division – Kauai District *(via email: alison.neustein@hawaii.gov)*
X Aha Moku *(via email: leimana.k.damate@hawaii.gov)*

TO: ~~FROM:~~ **Russell Y. Tsuji, Land Administrator** Russell Tsuji

SUBJECT: **EIS Preparation Notice for Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Action**

LOCATION: **Pacific Missile Range: Kekaha, Island of Kauai, Hawaii**
Kōke'e Park Geophysical Observatory: Waimea, Island of Kauai. Hawaii
TMKs: Various

APPLICANT: **Office of Planning and Sustainable Development**

Transmitted for your review and comment is information on the above-referenced project. The document will be available on the Environmental Review Program's website as of the date of publication, May 8, 2024. Please submit any comments to *timothy.chee@hawaii.gov* at the Land Division by the internal deadline of **May 27, 2024**. If no response is received by this date, we will assume your agency has no comments. If you have any questions, please contact Timothy Chee at the above email address. Thank you.

BRIEF COMMENTS:

Attachments
Cc: Central Files

( ) We have no objections.
(✓) We have no comments.
( ) We have no additional comments.
( ) Comments are included/attached.

Signed: CSC
Print Name: Carty S. Chang, Chief Engineer
Division: Engineering Division
Date: May 23, 2024

From: DBEDT OPSD Environmental Review Program <dbedt.opsd.erp@hawaii.gov>
Sent: Thursday, May 2, 2024 2:33 PM
To: info@PMRF-KPGO-EIS.com
Cc: DLNR.LD.Land <dlnr.land@hawaii.gov>
Subject: EIS Preparation Notice for Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Action

Aloha,

For your use in disseminating notice of the availability of the subject EISPN and informing readers of the June 17, 2024 deadline to submit comments, here is the link to where the document will be available on the Environmental Review Program's website as of the date of publication, May 8, 2024 (please advise readers that an error message may be received if the link is used prior to that date):

https://files.hawaii.gov/dbedt/erp/Doc_Library/2024-05-08-KA-EISPN-PMRF-and-Kokee-Park-Geophysical-Observatory-Real-Estate-Action.pdf

Please contact me should you have any questions regarding this matter.

Sincerely,

Tom Eisen
Senior Planner, Environmental Review Program
Office of Planning and Sustainable Development
State of Hawai'i
(808) 586-4185
thomas.h.eisen@hawaii.gov

NOTE: The Environmental Review Program's primary role is to facilitate Hawai'i's environmental review process by providing relevant guidance and support to agencies, applicants, consultants, interest groups, and the public. The ERP is not authorized to make determinations on Environmental Assessments, Environmental Impact Statements or exemptions. Pursuant to Chapter 343, Hawai'i Revised Statutes, all such determinations are made by appropriate State or county agencies, county Mayors or the Governor.

Scoping Comment Letter 0013

Surfrider Foundation Kauai Chapter <surfriderkauai@gmail.com>
EIS Scoping Comments PMRF-KPGO
To info@pmrf-kpgo-eis.com

5/31/2024 5:21 PM

Show images

External images are not shown to avoid potential tracking
Always show images from surfriderkauai@gmail.com

Surfrider Foundation
PO Box 819
Waimea, HI 96796

Thank you for the notice of the Pacific Range Missile Facility (PMRF) and the Kōkeʻe Park Geophysical Observatory (KPGO) Environmental Impact Statement (EIS) scoping process.

The Surfrider Foundation is a national coastal environmental organization. The Missile Range Facility is sited on the coast of Kauai.

PMRF is far more than a missile range. PMRF hosts submarine training, experiments with ocean sonar, both active and passive. PMRF has also been known to have military beach landing experiments and practice during Rim of the Pacific (RIMPAC) War “Games.” PMRF has an airport and has been known to have experimental aircraft testing. There have been rumors of torpedo testing that has harmed local whales.

Our first comment is that honest EIS scoping is impossible to do because everything done at PMRF is closed off and classified. The public has no idea of the dangers they might face from PMRF activities and experiments. The EIS process should be transparent and inclusive, allowing for meaningful public participation. It is vital that the community is kept informed and has ample opportunity to provide input throughout the process.

Our second comment is recurring. The Navy writes its own EIS and then the Navy certifies its own EIS. From our point of view, that is unethical and unfair and not in the spirit of the National Environmental Protection Act. We request an independent body prepare the DRAFT EIS.

Further scoping comments:

An environmental assessment of the natural lands around PMRF should be done and compared to the last EIS. Have the coastal lands and wetlands been enhanced or degraded? Have endangered species increased or decreased from the last EIS? The EIS should address the potential impacts on local flora and fauna, especially endangered species and their habitats. The analysis should include the effects of noise, light pollution, and any chemical byproducts that may affect the ecosystem. Please update and compare the Environmental Baseline Survey for the lowland area that was done over 20 years ago and complete a new Environmental Baseline Survey for the mauka (inland) area.

The EIS should assess how climate change will affect the facility’s operations and how the facility might contribute to climate change. This includes evaluating greenhouse gas emissions and potential increases in sea levels. That should include emissions from small boats, submarines, tow motors, missiles, airplanes and helicopters.

The water table at PMRF should be evaluated for military toxins. Groundwater contaminants were found in the past. Also, there had been a flame-retardant spill in the past. This is particularly important since there is a commercial shrimp farm adjacent to PMRF. Is the Shrimp Farm water contaminated?

PMRF has facilities from the World War II era. Are there any impacts?

What is the condition of the fuel tanks at PMRF? When will they be replaced? How do they differ from Red Hill, Oahu?

Please evaluate the impacts of explosive ordinance stored at the leased facilities at PMRF.

Please evaluate the danger to the public of trucks carrying ordinance, jet fuel, missiles and military weapons on Kaua’i highways.

How is the solid waste managed?

How is sewage managed?

Please look at the electromagnetic radiation radar effects on the soldiers, Koke’e residents and on local bird wildlife. Does the radar affect civilian weather use or boating navigation?

The land around PMRF was formerly agricultural, much of it still in agriculture. What are the Navy’s intentions and what are the impacts? PMRF leased land is in an extreme fire danger area. Are there mitigations they could do to lessen the danger?

It is crucial that the EIS explores alternative strategies that could minimize environmental and social impacts. Additionally, the document should outline clear mitigation measures to address any potential adverse effects.

Rob Brower, Chair
Surfrider Foundation, Kaua’i Chapter

--
www.kauai.surfrider.org
Facebook: Surfrider Kauai

If you do not wish to receive e-mails from Surfrider Kauai, please reply with UNSUBSCRIBE in the subject line.

Scoping Comment Letter 0014

Consent for storing submitted data
True

First Name
Charles

Last Name
King

Add Me to the Project Mailing List
Yes

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City
Koloa

State
HI

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96756

Email
cgking@me.com

Organization/Affiliation (if any)

Comments

I am in full support of renewing all the leases to the Navy at PMRF. I have been in business on Kauai for 50years and have always found them to be good neighbors. I remember, in particular, their support of our citizens and local government during Hurricane Iniki.

Add Attachments (optional)

Submitted on
06/03/2024

Scoping Comment Letter 0015

Consent for storing submitted data
True

First Name
David

Last Name
Phillips

Add Me to the Project Mailing List
Yes

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379 Kaholalele road

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Kapaa

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96746

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dphilhawaii@gmail.com

Organization/Affiliation (if any)

Comments
How much does the Navy pay the State total to lease the lands?

Add Attachments (optional)

Submitted on
06/04/2024

Scoping Comment Letter 0016

Consent for storing submitted data
True

First Name
Marjorie

Last Name
Gifford

Add Me to the Project Mailing List
Yes

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3-3400 Kuhio Hwy C307

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Lihue

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mfitting.gifford@gmail.com

Organization/Affiliation (if any)

Comments

Land use: Because of the high demand from both residents and tourists for the use of our beaches, it is almost impossible to get a parking place with beach access espedically on Saturdays and Sundays. If pmrf did not occupy and obstruct so much of our beachland, it would provide greater access to our residents. It is too time consuming to try to obtain a beach permit at pmrf AND the choice beach is not available except on one day at the beginning of July. LAND USE: Further, we need flat lands available on which to build housing for our low income people. Our workers are leaving the island because they cannot find housing or rentals. Leaving the pmrf areas available for the county to develop for low income housing would be a boon to our county. LAND USE: This land belongs to the Sovereign Hawaiian Kingdom and should be returned to it.

Add Attachments (optional)

Submitted on
06/04/2024

Scoping Comment Letter 0017

Consent for storing submitted data
True

First Name
Dylan

Last Name
Ramos

Add Me to the Project Mailing List
No

Street

City

State

Zip code

Email

Organization/Affiliation (if any)

Comments

The Navy and NASA should stop all PMRF operations and consider the serious concerns regarding cultural resources, land use, environmental justice, national defense, and more that have been raised for years by Native Hawaiian organizations, environmental groups, and grassroots, community-based movements.

Add Attachments (optional)

Submitted on
06/04/2024

Scoping Comment Letter 0018

Consent for storing submitted data
True

First Name
Lilley

Last Name
Lilley

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59-436 MAKANA RD

City
HALEIWA

State
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96712

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underwater2web@gmail.com

Organization/Affiliation (if any)

Comments

I am the marine biologist from Hanalei Kauai that documented the Navy killing the coral reefs along Kauai north shore with their microwave radar towers and electromagnetic discharge into the sea from submarines from 2012 to 2014. Navy produced radiation breaks down the calcium carbonate structure of the coral killing the reef. I have all the science proving this and I presented that to PMRF commander and legal team in 2015. The Navy needs to include in their EIS the effects of microwave radar towers, electromagnetic, plasma energy weapons and other forms of radiation used for surveillance underwater. By ignoring the effects of these energy sources the Navy would be violating the US Endangered Species Act as they operate in the habitat of the protected sea turtles, monk seals and endangered seabirds. Here is a movie I did on the subject in 2014 that I supplied to Congress. We have a great deal of new science done on the subject now from marine corrosion test to "skin effect" testing.
https://www.youtube.com/watch?v=YwTElEv5OX4&authuser=0

Add Attachments (optional)

Submitted on
06/05/2024

Scoping Comment Letter 0019

Consent for storing submitted data
True

First Name

Last Name

Add Me to the Project Mailing List
No

Street

City

State

Zip code

Email

Organization/Affiliation (if any)

Comments

The navy has threatened the very life that sustains the citizens it's supposed to protect by poisoning the water and damaging our ecosystem. End this unnecessary suffering now so our planet and people have a chance

Add Attachments (optional)

Submitted on
06/05/2024

Scoping Comment Letter 0020

Consent for storing submitted data
True

First Name
Eric

Last Name
Nguyen

Add Me to the Project Mailing List
No

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Mililani

State
HI

Zip code
96789

Email

Organization/Affiliation (if any)

Comments

Allowing the Navy to construct facilities in Koke'e would be introducing an inevitable environmental disaster. The Navy has a long history of showing zero competency and an unacceptable lack of transparency with the public in terms of being able to manage its own facilities and Hawaii's cultural & natural resources. The latest of many examples include Red Hill, Kamokala, and the ongoing contamination of lands at Joint Base Pearl Harbor. The effects of any sort of mishap would be too costly of a burden for the County of Kauai and State of Hawaii to handle. Installations on the island of Kauai already disrupt natural wildlife (i.e. PMRF and nesting birds). The impacts of equipment placed atop Koke'e must be studied to exhaustion, to not only wildlife, but to native flora, effects on local hydrology and geology, and with serious consideration of input from the people of Hawaii. Koke'e must be treated as a vital natural resource and preserved for the current generation as well as future generations. No more military development!

Add Attachments (optional)

Submitted on
06/05/2024

Scoping Comment Letter 0021

Consent for storing submitted data
True

First Name

Last Name

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kellicad3@gmail.com

Organization/Affiliation (if any)
Kaua'i Historical Society

Comments

Aloha, I'm a resident of Kaua'i, born and raised, and I am very interested in the results of the EIS and the overall process of the DOD's request to renew their lease. As an involved member of our West Side community, I have various concerns. I hope this report can be transparent about the following: -within the current plot of 8000+ acres, what kind of cultural, Hawaiian sites are there? What kind of care and protection is designated in those spaces. - how much live ammunition is tested on this property, what is the process of clean up after testing? - what kind of chemicals do these heavy metals/materials leave behind in the groun? Does it have any effect on nearby water sources? - What kind of guidelines are in places to protect areas of resource like watersheds, streams, irrigation systems, etc.? - will the team overseeing the EIS work with a cultural practitioner or historian? I am against renewing the lease as it stands, and I believe reform on the current lease is essential to protecting Hawai'i and our people. I have signed up for the email list. Thank you for your time and I look forward to seeing how this unfolds.

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0022

Sandi Quinsaat <squinsaat@icloud.com>
US Navy Pacific Missile Range Facility and NASA Koke'e Park Geophysical Observatory Real Estate Environmental Impact Statement
To info@pmrf-kpgo-eis.com

6/6/2024 2:12 AM

Aloha mai,

For the record, my name is Sandra Puanani Quinsaat, I am 70 years old, born and raised here on Kaua`i and thankful I can still live here. I am of Kanaka/Filipino/Caucasian decent.

I received your correspondence referencing the above noted subject, mahalo for reaching out. I will not be able to attend your meetings and appreciate submitting my testimony in writing.

Your proposed action is needed as the existing agreement for the State lands you occupy are set to expire. For this I'm sure there will be negotiations with the State based on the outcome of the EIS. These facilities are currently in existence with significant justification in their practices and areas of potential affect established. I don't object to the continuance of your business as you are currently operating. Your transparency and collaboration within our Island communities are key. I do however, strongly object to further development of buildings and desecration of ground on the properties you currently occupy. Moreover, I object to any training practices that exercises munition artillery that will impact the land or marine life in anyway shape or form. I say this by learning from history's lessons. Government has used abused and walked away from all destruction by their hands. No more! Not here on Kaua`i or anywhere else in this State going forward. Why ruin what little we have left, we are not a continent, where do we go! We know of other South Pacific Islanders who now reside here in Hawaii because their island was destroyed by US Government and countless destruction already done here in our State. These events happened we know that, so why would we support any form of destruction to our lands.

The State of Hawaii has laws in place to protect the land and its resources, I Pray they understand their responsibility to the Native Hawaiian/Kanaka as appointed stewards for the the people and make decisions based on Hawaii Revised Status. With the lack thereof being Hawaiian Lands and Resources, Military presence here in Hawaii must be regulated. I further pray that all contracted agreements between PMRF and the State are done with the best interest of Kaua`i residents at heart.

Mahalo for your understanding of my testimony

Kind regards,

Sandra P. Quinsaat
Native Hawaiian Organization
Na Hui O Kaneiolouma
Board Member

State of Hawai`i
Kaua`i/Ni`ihau Island Burial Council
Commissioner/Chair

Scoping Comment Letter 0023

Consent for storing submitted data
True

First Name
Hanna

Last Name
Hodak

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Yes

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Organization/Affiliation (if any)

Comments

The Pacific Missile Range Facility Barking Sands should not be in use or be furthered as it is harmful to local land, voices, and culture. There should be a Demilitarization to the parts of Hawai'i that can still be kept safe and culturally sound.

Add Attachments (optional)

Submitted on
06/06/2024

Scoping Comment Letter 0024

Jason Yotsuda <jkyotsuda@outlook.com>
Restricted use
To info@PMRF-KPGO-EIS.com

6/10/2024 3:18 PM

Hi,

I just wanted to put my 2 cents in about the continuation of PMRF using the area. In the past, we were allowed to access the beaches for fishing, but since 911 that has been taken away. The area is prime for fishing and beach going. I support PMRF, but not at the cost of restricted use of the beach area.

Mahalo,

Jason

Scoping Comment Letter 0025

Joshua K Hekekia <joshua.k.hekekia@hawaii.gov> 6/11/2024 2:35 PM

Re: DTS 202405131013NA - EISPN - PMRF-KPGO Real Estate Project

To Ferdinando, Lisa A CIV USN PMRF KEKAHA HI (USA) <lisa.a.ferdinando.civ@us.navy.mil> Copy info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Thank you Lisa.

From: Ferdinando, Lisa A CIV USN PMRF KEKAHA HI (USA) <lisa.a.ferdinando.civ@us.navy.mil>
Sent: Tuesday, June 11, 2024 8:34 AM
To: Hekekia, Joshua K <joshua.k.hekekia@hawaii.gov>
Cc: info@PMRF-KPGO-EIS.com <info@PMRF-KPGO-EIS.com>
Subject: [EXTERNAL] FW: DTS 202405131013NA - EISPN - PMRF-KPGO Real Estate Project

Aloha Joshua,

Comments are being accepted at info@PMRF-KPGO-EIS.com. I forwarded them your comment and have cc-ed them here. You can send any future comments to them directly. Please let me know if you need any additional information. Thank you for your comment.

Very Respectfully,

Lisa Ferdinando
Public Affairs Officer
Pacific Missile Range Facility
☎ Work: 808.335.4740
☎ DSN: 315.422.4740
☎ Cell: 808.590.7653
✉ Direct: Lisa.A.Ferdinando.civ@us.navy.mil
✉ Office: PMRFPublicAffairs@us.navy.mil

From: Hekekia, Joshua K <joshua.k.hekekia@hawaii.gov>
Sent: Monday, June 10, 2024 10:11 PM
To: PMRF Public Affairs <PMRFPublicAffairs@us.navy.mil>
Subject: [Non-DoD Source] DTS 202405131013NA - EISPN - PMRF-KPGO Real Estate Project

Dear Ms. Wells,

Please see the attached response letter from our Director for the Environmental Impact Statement Preparation Notice (EISPN) for the Pacific Missile Range Facility and Kokee Park Geophysical Observatory (PMRF-KPGO) Real Estate Project.

If you have any questions or concerns, please feel free to contact me via the information listed below.

Thank you.

Joshua K. Hekekia
Office of Planning & Sustainable Development
Planner, Coastal Zone Management Program
235 S. Beretania Street, 6th Floor
Honolulu, Hawai'i 96813
Ph.: (808) 587-2845
Joshua.k.hekekia@hawai.gov

- image002.png (28 KB)
- image003.png (18 KB)

STATE OF HAWAIʻI
OFFICE OF PLANNING
& SUSTAINABLE DEVELOPMENT

235 South Beretania Street, 6th Floor, Honolulu, Hawaiʻi 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaiʻi 96804

Telephone: (808) 587-2846
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Web: https://planning.hawaii.gov/

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR

MARY ALICE EVANS
DIRECTOR

Coastal Zone Management Program

Environmental Review Program

Land Use Commission

Land Use Division

Special Plans Branch

State Transit-Oriented Development

Statewide Geographic Information System

Statewide Sustainability Program

DTS 202405131013NA

June 10, 2024

Ms. Kerry Wells
Project Manager
Naval Facilities Engineering Systems Command, Hawai'i
Environmental OPHEV2
400 Marshall Road, Building X-l 1
Pearl Harbor, Hawai'i 96860
Attn: PMRF and KPGO RE EIS

Subject: Environmental Impact Statement Preparation Notice, Proposed Pacific Missile Range Facility and Koke'e Park Geophysical Observatory Real Estate Project
Kekaha, West Kaua'i on the Island of Kaua'i,

Tax Map Key(s): (4)1-2-001:001, 006, & 010; (4)1-2-002:001, 010-013, 015, & 024-030; (4) 1-2-016:011; (4) 1-4-001:002, 013, 014, & 999 and (4) 2-1-003:018

Thank you for the opportunity to provide comments for the Environmental Impact Statement Preparation Notice (EISPN) on the Pacific Missile Range Facility and Koke'e Park Geophysical Observatory Real Estate Project. The notification request was received by our office via memo on May 13, 2024.

It is our understanding that this real estate study involves two federal agencies. The U.S. Navy (USN) proposes to retain the use of 8,348 acres of the subject parcel for operational continuity and sustainment (in support of continued military training, testing, and facility operations) at the Pacific Missile Range Facility (PMRF). The National Aeronautic Space Administration (NASA) proposes to retain the use of 23 acres of the subject area in support of continued operations at Kōke'e Park Geophysical Observatory (KPGO).

Both federal agencies have agreements with the State of Hawai'i. The Department of Land and Natural Resources (DLNR) has the fiscal responsibility to manage these real estate agreements land leases which are set to expire between 2027 and 2030.

The Office of Planning and Sustainable Development (OPSD) has reviewed the submitted material and has the following comments to offer:

1. Issues of Programmatic Concern
   We acknowledge that the EISPN touches on issues that are of programmatic concern for OPSD and that will be addressed in the Draft Environmental Impact Statement (DEIS). These include State Land Use controls Hawai‘i Revised Statutes (HRS) Chapter 205 (State Land Use Laws); HRS Chapter 226 (the Hawai‘i State Planning Act); and as stated in Appendix B of the EISPN regulatory settings concerns that are related to the coastal environment such as Water Resources; Marine Biological Resources; and Geological Resources.

2. Coastal Zone Management Act (CZMA), Federal Consistency
   We note that Table 4-1, page 4-3 of the EISPN correctly identifies that this project may be subject to CZMA Federal Consistency based Title 15 Code of Federal Regulations (CFR) Part 930 Subpart C – Consistency for Federal Agencies. OPSD is the lead state agency with the authority to conduct CZMA federal consistency reviews. At your earliest convenience, please contact our office on the applicability of CZMA federal consistency.

3. Hawai‘i Coastal Zone Management (CZM) Program
   The CZM area is defined as “all lands of the State and the area extending seaward from the shoreline to the limit of the State’s police power and management authority, including the U.S. territorial sea” under HRS § 205A-1.

   Pursuant to HRS § 205A-4, in implementing the objectives of the CZM program, agencies shall consider ecological, cultural, historic, esthetic, recreational, scenic, open space values, coastal hazards, and economic development. As the determining agency is the DLNR Land Division, to assist in the decision-making process, the DEIS should include a discussion on the project’s consistency with the policies of the Hawai‘i CZM Program, HRS § 205A-2, as amended.

   Furthermore, the objectives and supporting policies of the Hawai‘i CZM Program serve as the foundation of the enforceable policies of the State of Hawai‘i. Disclosure of impacts on CZM objectives and supporting policies will aid the State in determining impacts to central O‘ahu surface water resources as well as evaluate needed mitigation measures.

For any questions regarding this comment letter, please contact Joshua Hekekia at (808) 587-2845 or by email to Joshua.K.Hekekia@hawaii.gov. If you wish to respond to this comment letter, please include DTS 202405131013NA in the subject line.

Sincerely,

Mary Alice Evans

Mary Alice Evans
Director

Scoping Comment Letter 0026

Consent for storing submitted data
True

First Name
Thomas

Last Name
Clements

Add Me to the Project Mailing List
Yes

Street
5725 Tapa St

City
Koloa

State
HI

Zip code
96756

Email
hrcpao@yahoo.com

Organization/Affiliation (if any)
Retired

Comments

I support Alternative 1 and recommend this as the preferred alternative. This alternative provides for the continued use of these lands with minimal costs to administer. Alternative 2 potentially causes the State of Hawaii to purchase these lands when no longer needed by PMRF, creating cost for the Federal government at the front, and State government at the other end. If not purchased back by the state at that time, the lands could potentially be purchased by private entities and used in non-compatible ways. I see compatibility as the key issue for West Kauai. Currently, Hawaii's top three industries successfully function together. Tourism craft cross the waters of the Range to Napali; agriculture benefits from the API lease that relieves the pressure of commercial development interests, and PMRF continues as the #3 employer -- offering high tech careers while serving as the largest multi-environment instrumented range. Compatible tourism and agriculture activities ensure the viability of this national asset. High density housing and commercial development in the API leased lands create encroachment concerns that limit the effectiveness of PMRF. Therefore, these leased lands should continue without adjustments to preserve compatibility and viability for Hawaii's leading industries.

Add Attachments (optional)

Submitted on
06/10/2024

Scoping Comment Letter 0027

Consent for storing submitted data
True

First Name
Susan

Last Name
Wiener

Add Me to the Project Mailing List
Yes

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Pu'u Rd

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State
HI

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96741

Email
energysavant@yahoo.com

Organization/Affiliation (if any)

Comments

Of the Action Alternatives, I definitely do NOT support Alternative 2 in which the Navy and NASA would purchase acreage on Kauai.

Add Attachments (optional)

Submitted on
06/10/2024

Scoping Comment Letter 0028

Consent for storing submitted data
True

First Name
Lisa

Last Name
Grandinetti

Add Me to the Project Mailing List
Yes

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96826

Email
lisanakagrand@gmail.com

Organization/Affiliation (if any)

Comments

Demilitarize the illegally occupied Kingdom of Hawaii!

Add Attachments (optional)

Submitted on
06/10/2024

Scoping Comment Letter 0029

Don Wilson <wilsond049@hawaii.rr.com> 6/11/2024 7:55 PM

EIS RE: PMRF & NASA at KoKE'E PARK, KAUAI, HI

To info@pmrf-kpgo-eis.com

To: Commanding Officer, Naval Facilities Engineering Systems Command, Hawaii

Subject: EIS concerning Koke’e Park, Makaha Ridge, Kauai

Please accept my comments, attached, as a former PMRF CO.

If you have any questions/concerns, I can be reached via my email, or (808) 465-1394, or residence, 1212 Punahou St., Apt. 3108, Honolulu, HI 96826.

Thank you for the opportunity to comment.

Very respectfully,

D. H. Wilson
CAPT, USN (Ret)

- Kokee EIS.docx (22 KB)

11 June 2024

To: NAVFACHI Environmental OPHEV2, Attn: PMRF and KPGO Re: EIS PM

Subj: Environmental Impact Statement re: Koke'e Park, Kauai

Ladies/Gentlemen,

Please accept my strong endorsement for US Navy, NASA, Hawaii Air National Guard, FAA, and varied communications assets to continue to use HI State Koke'e Park land, to the benefit of the United States, Hawaii State, and Kauai County.

In context, I am a former PMRF Commanding Officer, long since retired, and I have no personal or financial interest in this EIS. That said, given my professional knowledge of the facilities and operations located on the land, I believe these tenants should remain indefinitely – or until their use is no longer required.

The US Navy is but one tenant, and Koke'e affords the greatest radar range available, given the height of Makaha Ridge. Being able to "see" great distances from a stable, fixed point assures greater safety, precise tracking, and coordination with other sensors to enhance training, and test and evaluation events. Rescinding authorization to use Koke'e would adversely impact Department of Defense – and other - missions, writ large. There is no viable substitute for this site, and the navy's presence is not just benign; the navy is a very good steward of the land. Indeed, navy assets are so integral to the land, feral goats proliferate the property because they are protected – to the chagrin of local hunters who know they cannot access the land.

NASA, another tenant at Koke'e, values its assets at Koke'e, and often coordinates its efforts with the US Navy to either support complementary missions, or deconflict concurrent events. I don't speak for NASA, but I know of their efforts, and why they too treasure Koke'e's geographic position and altitude

While I do not speak for other federal or HI State agencies also using the Koke'e site, I'm confident they too would/will support continued access, for the same reasons. The FAA, for example, tracks flights into/out of DKI International Airport, as well as trans-Pacific flights originating either from the US Mainland going east to Asia, and flights from Asia to the US Mainland. FAA radars and communications networks are integral and invaluable assets for safe commercial flights.

The point remains: USN and other tenants at Koke'e are respectful of the land, the Hawaiian culture, and the contributions their assets bring to the state and nation. Operations conducted at Makaha Ridge do not adversely impact the park land per se, nor appurtenant lands.

Strongly recommend existing leases be perpetuated for the reasons stated.

D. H. Wilson, USN
CAPT, USN (Ret)

Scoping Comment Letter 0030

Hayden Hislop <haydenhislop@gmail.com> 6/12/2024 3:23 AM

Testimony Against Renewal of PMRF Land Lease

To info@pmrf-kpgo-eis.com

To whom it may concern,

I am writing to express my strong opposition to the renewal of the Pacific Missile Range Facility (PMRF) land lease on Kauai. The renewal process has lacked transparency, with inadequate advertising, leading many to believe that the Navy is deliberately avoiding public scrutiny. This lack of due diligence is concerning, especially given the lease terms of just $1 per year, which is far below market value. The state must demand fair market value or more for this land.

There are critical questions regarding the state's right to lease these lands. The base facilitates activities such as “test” bombing the ocean and minor outlying islands, causing significant ecological damage. The Navy must clarify which Native Hawaiian organizations they are consulting for the mandatory Section 106 Cultural Impact Assessment. Native Hawaiian rights to fish and hunt from the ocean to the mountain without needing identification must also be respected.

The land currently held by PMRF could be converted into farmland to feed Kauai. Currently, this area is not utilized for agriculture, primarily due to military control and environmental contamination from chemical sprays. These chemicals, including herbicides and other hazardous substances, pose a significant threat to the local environment and public health. The ecological devastation caused by PMRF includes the diversion of water on the Mānā Plain, which disrupts traditional cultural practices and the natural wetland ecosystem.

If PMRF were not there, restoring this wetland would involve reestablishing native plant species, reviving traditional taro farming (loʻi kalo), and improving habitat for local wildlife. Such restoration would enhance biodiversity and reconnect the native Hawaiian community with their cultural heritage and traditional land stewardship practices.

Additionally, the presence of PMRF has led to housing displacement for local residents, as military personnel occupy housing that could otherwise be available to Kauai's residents. This displacement exacerbates the housing crisis and impacts the social fabric of our community.

Finally, PMRF stands as a symbol of the illegal occupation of Hawaii, a painful reminder of historical injustices that continue to affect native Hawaiians. The facility is also used to train foreign military forces, such as the Israeli Defense Force, further alienating the local community and contradicting our values of peace and sovereignty.

For these reasons, I urge you to consider the long-term benefits of repurposing the PMRF land for agricultural use and ecological restoration. This decision would promote food security, environmental sustainability, cultural preservation, and social equity for the people of Kauai.
Thank you for your attention to this critical issue.

Sincerely,
Hayden Hislop

Scoping Comment Letter 0031

Michael Curtis <808randr@gmail.com> 6/13/2024 3:43 PM

6/4 meeting Lihue Vet Center

To info@pmrf-kpgo-eis.com

Attached are comments from scoping meeting.

First: No Movies??? used to have.

Aloha,
mike

Michael Curtis
c 808-639-7878, fax 888-370-2684
808RandR@gmail.com
from Poipu Beach, the Leading Edge of the Known Universe®

- PMRF comments.PDF (736 KB)

Public Scoping Meeting Comment Form

Date: 6/4/2024 Lihue Kauai

Please submit comments for the scoping process by June 17, 2024. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

- In person at a public scoping meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by June 17, 2024 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

No MORE Movies???

Military testing + practices improve our US + Allies performance

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Please provide your mailing address to receive future notifications about the project.

1. Name: Mike Curtis
2. Organization/Affiliation (if applicable): N/A
3. Mailing Address: EdgeRandRog@Mail.com

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

Please turn in this form at a public scoping meeting, submit online at PMRF-KPGO-EIS.com, send by email to info@PMRF-KPGO-EIS.com or mail to:

Naval Facilities Engineering Systems Command, Hawai'i, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

Scoping Comment Letter 0032

Kamakana Ferreira <kamakanaf@oha.org> 6/13/2024 6:53 PM

OHA Comment Re: PMRF Real Estate Renewal EISPN

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> Copy Hulu Lindsey <hulul@oha.org> • Dan Ahuna <dana@oha.org> • Dawn Chang (Guest) <dawn.chang@hawaii.gov>

Aloha,

Attached is an Office of Hawaiian Affairs (OHA) comment letter on the May 2024 Environmental Impact Statement Preparation Notice (EISPN) for the Pacific Missile Range (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kauaʻi. Naval Facilities Engineering Systems Command has prepared this EISPN on behalf of the Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) in accordance with Hawaiʻi Revised Statutes (HRS) 343 and the National Environmental Protection Act (NEPA).

A hardcopy of the letter will be mailed out to you tomorrow. Please let me know if you have any questions.

Mahalo,

Kamakana C. Ferreira, M.A.

Lead Compliance Specialist

Office of Hawaiian Affairs

560 N. Nimitz Hwy

Honolulu, Hi. 96817

(808)594-0227

- 06.07.24_ OHA Comment on EISPN for PMRF Real Estate Renewal, Kauai.pdf (300 KB)

PHONE (808) 594-1888 FAX (808) 594-1938

STATE OF HAWAI'I
OFFICE OF HAWAIIAN AFFAIRS
560 N. NIMITZ HWY., SUITE 200
HONOLULU, HAWAI'I 96817

June 7, 2024

Kerry Wells
PMRF and KPGO EIS Project Manager
Naval Facilities Engineering Systems Command
400 Marshall Road, Building X-11
Pearl Harbor, Hawai'i 96860

Re: Environmental Impact Statement Preparation Notice (EISPN)
Pacific Missile Range Facility and Kōke'e Park Geophysical Real Estate EIS
Waimea Ahupua'a, Kona Moku, Kaua'i Mokupuni
Tax Map Key: (4) 1-2-002:001, 010, 011, 012, 013, 015, 024, 025, 026, 027, 028, 006; (4) 1-2-016:011; (4) 1-4-001:013, 999; (4) 1-2-002:029, 030; (4) 2-1-003:018; (4) 1-2-001:001, 010; (4) 1-4-001:002, 013, 014.

Aloha e Ms. Wells:

The Office of Hawaiian Affairs (OHA) is in receipt of the May 2024 Environmental Impact Statement Preparation Notice (EISPN) for the Pacific Missile Range (PMRF) and Kōke'e Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kaua'i. Naval Facilities Engineering Systems Command has prepared this EISPN on behalf of the Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) in accordance with Hawai'i Revised Statutes (HRS) 343 and the National Environmental Protection Act (NEPA). As existing real estate agreements are set to expire between 2027 and 2030, the DON is proposing to retain the use of 8,348 acres of State lands for operational continuity and sustainment (in support of continued military training, testing, and facility operations) at PMRF. NASA also proposes to retain the use of their 23 acres of State lands in support of continued operations including measurements of the Earth's rotation and local land motion at KPGO.

The DON's current real estate agreements with the Department of Land and Natural Resources (DLNR) include 684 acres of leaseholds and 7,664 acres of easement lands, for a total of 8,348 acres. Current leases and easements are primarily used for passive encroachment buffers, as well as for mission readiness, access, and utilities at the following five general locations: Main Base, Kamokalā Ridge, Mānā Water Well, Miloli'i Ridge, and Mākaha Ridge. No ground-based training occurs on these parcels.

NASA's current real estate agreements with DLNR include 16 acres of leaseholds and 7 acres of easement lands, for a total of 23 acres. NASA issued the DON a Use Permit in 2016 for

portions of KPGO to conduct radar, telemetry, and communications services in support of PMRF operations. Additionally, the Navy and NASA conduct environmental management and stewardship activities on these lands.

The OHA is the constitutionally established body responsible for protecting and promoting the rights of Native Hawaiians.[1] OHA has substantive obligations to protect the cultural and natural resources of Hawai'i for its beneficiaries.[2] Accordingly, OHA is required to (1) serve as principal public agency in the State of Hawai'i responsible for the performance, development and coordination of programs and activities relating to native Hawaiians and Hawaiians; (2) assess the policies and practices of other agencies impacting native Hawaiians and Hawaiians; and (3) conduct advocacy efforts for native Hawaiians and Hawaiians.[3]

OHA provides the following comments pertaining historic preservation coordination, biological surveys, alternatives analysis and restoration component, ceded land trust considerations, and the recordation of comments:

Historic Preservation Coordination

The EISPN indicates that cultural resources will be identified for National Historic Preservation Act (NHPA) eligibility and HRS Chapter 6E significance. While it appears State and Federal level historic preservation compliance is required, there is no clear timeline for coordination of NHPA, HRS 6E, and NEPA compliance. It is further not clear how findings from NHPA and HRS 6E will be utilized in informing the NEPA document, especially in regards to the identification of adverse impacts to historic properties and cultural resources.

Fortunately, the Advisory Council on Historic Preservation (ACHP) and Council on Environmental Quality (CEQ) did issue a handbook[4] in March 2013 for assisting Federal agencies on integrating NEPA and Section 106 reviews. Notably, the handbook recommends coordinating the planning schedules for both NEPA and Section 106 processes as NHPA is needed to properly inform the NEPA document on possible impacts to historic properties. The handbook specifically states that,

> "an EA [environmental assessment] includes the Section 106 focus on which part of the proposed action could specifically affect a historic property and describes how the resource might be affected… To coordinate Section 106 and an EA, an agency would use the Section 106 adverse effect criteria in evaluating and describing effects on historic properties. Agencies may also find it helpful to relate adverse effects under Section 106 to criteria for determining the significance of impacts under NEPA... Any treatment and mitigation measures developed through the Section 106 process should be referenced in the EA and

[1] Haw. Const. Art. XII Sec. 5.
[2] See HRS § 10.
[3] HRS § 10-3.
[4] March 2013. *NEPA and NHPA: A Handbook for Integrating NEPA and Section 106.* Prepared by the Council on Environmental Quality Control, Executive Office of the President, and the ACHP.

> documented in a MOA [memorandum of agreement] or PA [programmatic agreement] developed in consultation with consulting parties."

Thus, OHA recommends that the EIS have a clear timetable and explanation for NEPA and NHPA coordination, with enough time allotted for substantial completion of NHPA to effectively detail identified historic properties, impacts, and mitigations within the NEPA document.

While OHA does recognize that the State level processes for HRS 6E and 343 are separate, we have been supportive of the HRS 6E process being completed or at least initiated first to assist in properly informing the environmental review process. This is commensurate with Federal level guidance on NHPA. The intent of HRS Chapter 343 is to ensure a project's impact to the environment is fully considered in the planning process and to integrate mitigation where needed to minimize significant environmental harm. Surveys are conducted to identify various environmental components (i.e., flora, fauna, historic properties) so that any adverse impacts from the proposed action can be evaluated. In determining whether historic properties will be adversely impacted, the HRS 6E review process is essential to identifying historic sites and generating mitigation commitments in consultation with the State Historic Preservation Division (SHPD). Any identified sites and resulting mitigations made during the HRS 6E review process are typically included in the environmental review for an adverse impact analysis and public comment.

Hawai'i Administrative Rules (HAR) 11-200.1-18(d)(7) and (8) requires that impacts be identified and proposed mitigations be included within an environmental assessment. If HRS 6E is conducted after the HRS 343 process, impacts to historic and cultural resources cannot be fully identified as the statutory process to identify these environmental components is not yet completed. Furthermore, since mitigation for any adverse effects to historic properties and cultural resources are made as a result of consultation with SHPD through the HRS 6E process, proposed mitigations from this statutory process cannot be included in environmental review documents if HRS 6E is not completed first. OHA thus questions the completeness of any environmental review for projects that have not yet undergone HRS 6E review.

As one of the key pillars of HRS 343 is to allow for public comment on a proposed action, deferring the HRS 6E review process to take place after HRS 343 review could hide the presence of historic properties and cultural resources that are important to Native Hawaiians from our beneficiaries and the general public. As the opportunity to include possible adverse impacts and mitigations in an environmental review would be foreclosed, our beneficiaries would not be fully informed on the proposed action when environmental review documents are specifically provided for comment. Thus, OHA recommends that the draft EIS (DEIS) demonstrate HRS 6E compliance in a way that ensures historic properties are properly identified, and mitigation provided for any adverse impacts. Further, if not done so already, OHA encourages consultation with the SHPD as soon as practicable.

Biological Surveys

The EISPN does acknowledge that there are Endangered Species Act (ESA) species in the region, that include the Hawaiian hoary bat ('ope'ape'a), nēnē goose, pueo, Newell's shearwater, Hawaiian petrel, and the band-rumped storm petrel. In regards to rare state-recognized endemic forest birds, the EISPN mentions that the scarlet honeycreeper or 'i'iwi, 'apapane, and 'amakihi have been observed in the Kaunuohua Ridge. Five Federally listed plants were also noted in the Mākaha Ridge, that includes the Ni'ihau lobelia, makou, Hawai'i scaleseed, dwarf iliau, and the mā'oli'oli.

The EISPN states that potential impacts to biological resources will be evaluated. OHA recommends that any biological surveys done to determine the presence of any species must take into account seasonal considerations, be up-to-date, compare results with past surveys, and even obtain knowledge from cultural practitioners (with vast generational knowledge on cultural resources in the area). In regards to the latter, consultation with cultural practitioners could either be done directly or integrated with the cultural impact assessment (CIA).

If not done so already, OHA recommends early consultation with both the United States Fish & Wildlife Service (FWS) and the State of Hawai'i DLNR Division of Forestry and Wildlife (DOFAW). Both entities have vast knowledge regarding endangered and threatened species, and can offer guidance on Federal and State level compliance. DOFAW may perhaps have contacts with knowledgeable cultural practitioners as well to aid in producing the most accurate biological surveys.

Alternatives Analysis and Restoration Component

The EISPN currently details that 2 long-term alternatives and one no action alternative will be explored in the DEIS. It would appear that there is not much difference between Alternatives 1 and 2 except for Alternative 2 suggesting a fee simple acquisition of 700 acres of leasehold lands. There is no alternative proposing a shorter lease term. OHA argues that a meaningful analysis of a shorter-term lease option should be included in the DEIS as constant renewal of a long-term lease creates the appearance of *de facto* ownership.

As you are likely aware, the public's trust in the military has been shaken with recent events like the diesel fuel spill atop Haleakalā and the Red Hill fuel leak on O'ahu. Thus, there is a greater level of public awareness and concern regarding the military's actions and their ability to be good stewards of the land. This is especially true for military operations on State lands. As such, the military must strive to build back public trust and confidence by perhaps undertaking projects that are smaller in scope and easier to manage. Such projects could further include robust restoration components to properly demonstrate that the military can effectively restore lands after they are used for military operations. Currently, the EISPN seems to suggest the possibility that if leases aren't renewed, that the DON might abandon infrastructure in place. This is unacceptable and further serves to create a liability for the State. For this reason, OHA recommends a more moderate (short-term lease) alternative option that can still accomplish bare minimum mission requirements

for the military. But, perhaps more importantly, all alternatives should include a robust restoration component that shows how lands can be restored post military use, especially for lands owned by the State.

Ceded Land and Conservation District Considerations

The EISPN mentions that land leased and in easement by the DON and NASA are classified as conservation or agricultural district lands. OHA notes that these State lands are also "ceded" lands as described in Section 5 of the Admissions Act. In regards to OHA's own trust responsibilities, we have a vested interest in ceded lands that are part of the public land trust. Per the State of Hawai'i Constitution, Article XII, Sections 5 and 6, the OHA trustees exercise their power "to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiian, including all income and proceeds from that pro rata portion of the trust referred to in section 4 of this article for native Hawaiians..."[5]. Affirmation of OHA's public trust duties are further captured in Hawai'i Revised Statutes (HRS) Chapter 10 to assess the practices of other agencies and advocate where necessary to make recommendations that limit or eliminate potential irrevocable harm to cultural resources and the public land trust. As such, OHA must be consulted as part of the lease renewal process and included in discussions with the DLNR. We advise that the DEIS include direct mention of this process.

As the DON and NASA have utilized these State parcels for decades, it is unclear if the State has been actively conducting periodic monitoring and site visits of these lease areas as an essential component of the State's duty to protect and preserve trust land is an obligation to reasonably monitor a third party's use of the property. To hold otherwise would permit the State to ignore the risk of impending damage to the land, leaving trust beneficiaries powerless to prevent irreparable harm before it occurs. Unless the condition of these lands is independently determined by the State, the State should arguably not entertain a process seeking renewal. Ignoring this obligation would show a disregard for the State's trust responsibilities. Procedurally, the DEIS should address any possible concerns noted by the State via an independent inspection or if an inspection is pending, detail the timeline for such inspections and subsequent report disclosures; in turn, the public would be allowed to comment via the HRS 343 process on how these deficiencies are being corrected or not.

As you are likely aware, the military use of State lands at the Pōhakuloa Training Area (PTA), on Hawai'i Island, was challenged in court recently (see Ching v Case). In 2019, the court ordered the State of Hawai'i DLNR to prepare a management plan that must include provisions for periodic monitoring of these lands as to ensure fulfillment of State trust responsibilities. OHA would assume that provisions for the State to independently conduct periodic monitoring and site visits at PTA would apply to other State lands leased by the military.

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[5] See State of Hawai'i Constitution, Article XII, Sections 5 and 6.

In regards to conservation district use, OHA recommends that consultation with DLNR's Office of Conservation and Coastal Lands (OCCL) should already be occurring to determine what types of compliance actions are necessary to enable military utility use. This should be fully discussed in the DEIS. Arguably, it is unclear how military use is consistent with conservation district zoning uses.

Recordation of Comments

HAR 11-200.1-24(s)(1) states that a DEIS shall include "reproductions of all written comments submitted during the consultation period required in section 11-200.1-23." Typically, state level DEIS's or DEA's will provide copies of all written comments as they were originally received. OHA believes that while some agencies sometimes opt to recreate or summarize comments in their own formats, the intent of the rules is to include actual copies to demonstrate that comments were unaltered and applicable to the public scoping or early consultation process for HRS 343 compliance. As such, please include unaltered copies of any written comments received as part of public scoping meetings or in response to the EISPN.

Closing Remarks

Mahalo for the opportunity to comment. OHA looks forward to seeing our comments taken into consideration as the DEIS is being prepared. Should you have any questions, please contact OHA's Lead Compliance Specialist, Kamakana C. Ferreira at (808) 594-0227 or by email at kamakanaf@oha.org.

'O wau iho nō me ka 'oia 'i'o,

Stacy Ferreira
Ka Pouhana, Chief Executive Officer

SF:kf

CC: Carmen Hulu Lindsey, Ke Kauhuhu, Chair, OHA Board of Trustees
Dan Ahuna, Ke Kua 'O Kaua'i, OHA Trustee for Kaua'i
Dawn Chang, Chairperson, Board of Land and Natural Resources

Scoping Comment Letter 0033

Dayna K Vierra <dayna.k.vierra@hawaii.gov> 6/14/2024 3:31 PM

PMRF-KPGO EISPN DLNR-Land Division Comment Letter

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> Copy Timothy Chee <timothy.chee@hawaii.gov> • Lauren E Yasaka <lauren.e.yasaka@hawaii.gov> • Ian C Hirokawa <ian.c.hirokawa@hawaii.gov> • Kevin E Moore <kevin.e.moore@hawaii.gov> • Russell Y Tsuji <russell.y.tsuji@hawaii.gov>

Good Morning,

Please find the PMRF-KPGO EISPN comment letter for DLNR-Land Division attached.

If you have any questions, please let me know.

Thank you,
Dayna Vierra, Planner
Department of Land and Natural Resources, Land Division
1151 Punchbowl Street, Room 220
Honolulu, HI 96813
Tel: (808) 587-0423
Fax: (808) 312-6357
Email: dayna.k.vierra@hawaii.gov

- 061224 LD Comment Letter PMRF KPGO EISPN.FINAL - signed.pdf (282 KB)

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

DAWN N. S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

June 14, 2024

Mrs. Michele Lefebvre
Stantec GS Inc.
737 Bishop Street, Suite 3050
Honolulu, HI 96813
Sent via E-mail: info@PMRF-KPGO-EIS.com

Dear Mrs. Michele Lefebvre

SUBJECT: Comments on the Environmental Impact Statement Preparation Notice for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate, Island of Kaua'i.
Tax Map Keys (TMKs): (4) 1-2-001:001, 006, 010; (4) 1-2-002:001, 010, 011, 012, 013, 015, 024, 025, 026, 027, 028, 029, 030; (4) 1-2-016:011; (4) 1-4-001:002, 013, 014, 999; (4) 2-1-003:018.

Thank you for the opportunity to review and comment on the subject Environmental Impact Statement Preparation Notice (EISPN). The Land Division offers the following comments:

1. Section 1.1 (Project Introduction and Overview), first paragraph, includes a statement that the Draft Environmental Impact Statement (EIS) is being prepared "*in coordination with the Hawai'i Department of Land and Natural Resources*". The Department of Land and Natural Resources (DLNR) emphasizes that it is not assisting the Navy with the preparation of their Draft EIS. As the accepting authority, Staff is available for questions regarding the EIS process and DLNR will provide comments on the EIS during the official public comment period(s).

2. Section 1.1, page 1-3, paragraph 2, states: "*As requested by and in coordination with DLNR, the Navy and NASA identified that an EIS is the appropriate level of environmental review for the Proposed Action…"* The DLNR would like the Draft EIS to clarify that the DLNR did not make the initial determination. The Navy proposed the preparation of an EIS and the DLNR concurred with the decision. Further, we note that the referenced email is in regard to our initial review of the EISPN for compliance with Hawai'i Administrative Rules (HAR) Chapter 11-200.1 prior to the publication of the EISPN in Environmental Review Program's (ERP's) *The Environmental Notice* and does not pertain to the DLNR making any determination regarding the need for an EIS.

3. Section 1.1, page 1-3, paragraph 4, states that: *"For this Proposed Action, DLNR is responsible for issuing leases and easements to the NAVY and NASA. DLNR is the agency with the responsibility for approving the real estate action since the State lands*

are under the management of DLNR's Land Division. DLNR is required to conduct an environmental review of this Proposed Action."

We wish to clarify that while the DLNR, Land Division is responsible for processing land dispositions, it is ultimately the Board of Land and Natural Resources' (BLNR's) decision to approve or deny any such land disposition actions.

4. In the forthcoming Draft EIS, please describe the type of "surveillance and tracking" that occurs at Kōke'e Park Geophysical Observatory (KPGO), as indicated in Section 1.2 (Project Area). Also, please clarify what is being surveilled and tracked as well as the purpose of the backup power generation.

5. Section 1.3.3 (Navy Mission at PMRF) states that: *"The Navy conducts missile systems tests and has supporting facilities to track and evaluate these tests from the ocean floor to the outer atmosphere."* Please include in the Draft EIS, what is involved in the missile systems tests and how it affects the water, land, and air, etc. Please also clarify what are the *"supporting facilities"* that track and evaluate the tests.

6. Section 1.3.3 also mentions that testing occurs on the "ocean floor." Staff notes that the original lease contains an ocean right of way lease for 7,680 acres, but the current Proposed Action does not include those lands. Please explain in the Draft EIS why these submerged lands are no longer included.

7. Section 1.3.5 (Navy and NASA Use of State Lands) makes reference to a Figure 1-4, however, it would appear that the figure and what is supposedly being described in Appendix D do not coincide. Please revise the figure to show the applicable leaseholds and easements as described in Appendix D.

8. While we appreciate Table 2-1 (Section 2.2 Alternative Screening Process) and the descriptions given for each alternative, we believe that Alternative 1 and Alternative 2 are essentially the same action as the only difference is the land tenure mechanism (lease versus fee). While we agree that there may be different impacts given the land tenure mechanism, the DLNR would appreciate it if the Navy and NASA would analyze an additional alternative that would consider a modified Proposed Action.

9. In Section 2.3.1 (Alternative 1: Succeeding Current Real Estate Agreements), it states that *"the Navy and NASA would continue to adhere to applicable federal and state laws as well as policies and regulations applicable to Navy and NASA regarding investigation, removal, and cleanup of hazardous and toxic materials and wastes"*. In the Draft EIS, please include a discussion on the environmental impacts of removal and cleanup of hazardous and toxic materials and wastes.

10. Regarding Table 2-6, please provide the status of any surveys or programs that are supposedly implemented as a part of the Best Management Practices (BMPs) and/or management strategies as well as how often reoccurring surveys or consultation take place.

11. The 2nd paragraph in Section 3 (Project Setting) appears to either reference two separate documents or a later version of the same document. It states that the impacts to airspace, marine navigation, and marine resources from existing training and testing will be in the *Hawai'i-Southern California Training and Testing Final EIS/OEIS*. Any

additional analysis of future at-sea training and testing will be found in the proposed *Hawai'i-Southern California Training and Testing Final EIS/OEIS*. Please clarify this in the Draft EIS.

12. In Section 3.1 (Archaeological and Historic Resources), please be sure to include any findings regarding 'iwi kūpuna when doing archaeological surveys.

13. In Section 3.2 (Cultural Resources), there is mention of past and present cultural practices that have been identified through prior consultation with Native Hawaiian organizations and other stakeholders. In the Draft EIS, please include the names of those that have already been consulted with as well as those who have been consulted specifically in regard to the Cultural Impact Assessment (CIA) and their lineal ties to the project area. In addition, the DLNR requests that the Navy and NASA consult with the State Aha Moku.

14. In Section 3.3 (Biological Resources) of the Draft EIS, please define the area of interest.

15. Based on the description of Figure 3.3-1 in Section 3.3, 2nd paragraph, the figure should also include the noted interconnected system of irrigation ditches.

16. Regarding Section 3.6 (Environmental Justice), in the Draft EIS, please provide some examples of the demographic and socioeconomic indicators that will identify potentially disadvantaged communities.

17. In Section 3.7 (Water Resources) of the Draft EIS, please include a discussion on the methodology of how potential impacts to water resources were evaluated.

18. In Section 3.8 (Utilities), please identify (location and ownership) the "*existing wells*" that serve Kamokalā Ridge, Mākaha Ridge, and KPGO.

19. In Section 3.9 (Public Health and Safety) please provide the following:

    - Paragraph 3 mentions establishment of Ground Hazard Areas (GHAs) and Launch Hazard Areas over water. Please clarify if and/or how this is related to the ocean right of way lease that was mentioned in our earlier comment.

    - Paragraph 5 mentions safety procedures to prevent unintentional or unauthorized detonation of ordnance. Please include a description of these procedures in the Draft EIS.

    - Paragraph 6 talks about the transportation and handling of ammunitions, explosives, and hazardous materials. It further mentions that all ordnance is transported in compliance with PMRF Instruction 8023.G and U.S. Department of Transportation regulations. Please provide these documents or a discussion regarding these rules and regulations.

20. Please note that on Page 3-14, Section 3.10.1 (Air Quality), all the other elements listed in the first paragraph have their abbreviated symbol except lead (Pb).

21. In Section 3.12 (Hazardous Materials and Wastes), it mentions that used oil is taken to the Main Base to be recycled. In the Draft EIS, please provide the procedures followed

in the event of an oil spill during transport. Also, please provide a copy or access to the various hazardous materials management plans that are mentioned in this section.

22. Non-common words or actions - There are several instances in the document where there is use of potentially non-common words or actions. It would be appreciated if you were to include either definitions of the words or explanations of the actions. For example, in Section 1.1 the term "local land motion" is used. A definition or explanation on what local land motion is would be beneficial. Also, in Section 1.2, there is mention that Miloli'i Ridge is used for radar and telemetry activities. It would be helpful if there was an explanation of what telemetry activities are.

23. Acronyms - The acronyms for Office of Planning and Sustainable Development (OPSD) and the Space Exploration Network Services and Evolution (SENSE), are not included in the main document and on the Abbreviations and Acronyms page (vii). A further review of the document may be warranted to check if there are other omissions.

24. Hawaiian Diacritical Markings – In Section 1.3.1, the Hawaiian diacritical mark (the kahako) is missing from the word Kalākaua. A further review of the document may be warranted to check if there are other omissions.

Should you have any questions or concerns regarding this correspondence, please contact Dayna Vierra of the Land Division at (808) 587-0423.

Sincerely,

Russell Tsuji

Russell Y. Tsuji, Administrator
Land Division

Scoping Comment Letter 0034

Kendall L Tucker <kendall.l.tucker@hawaii.gov> 6/14/2024 3:55 PM

Notice of Intent To Prepare an Environmental Impact Statement for Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Aloha,

Attached you will find the State of Hawaii Division of Aquatic Resources (DAR) comments on the intent to prepare and EIS for the Pacific Missile Range Facility and Kokee Park Geophysical observatory. Please let me know if you have any problems with the document, or if there are any additional questions we can answer. Thank you

Kendall

Kendall (Tejchma)Tucker
Aquatic Biologist-Permits and Environmental Reviews
DLNR-Division of Aquatic Resources
1151 Punchbowl St. Rm 330 Honolulu, HI 96813
Kendall.l.tucker@hawaii.gov | 231-670-7719 cell |

- AR6675 comments (part 1) - signed.pdf (424 KB)

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL
RESOURCES DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

Date: 6-12-24
DAR # AR6675

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

DEAN D. UYENO
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
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: Heather Ylitalo-Ward, Aquatic Biologist

SUBJECT: Notice of Intent To Prepare an Environmental Impact Statement for Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate

Request Submitted by: Department of the Navy, Department of Defense, National Aeronautic

Location of Project: 8,348 acres of State lands on Kauai, Hawaii

Brief Description of Project:

Pursuant to the National Environmental Policy Act (NEPA) of 1969 and regulations implemented by the Council on Environmental Quality, the Department of the Navy (DON) and National Aeronautics and Space Administration (NASA), the DON and NASA announce their intent to prepare an Environmental Impact Statement (EIS) to evaluate the potential environmental effects associated with the continued long-term DoD use of 8,348 acres of State lands on Kauai, Hawaii for operational continuity and sustainment (in support of continued military training, testing, and facility operations) at the Pacific Missile Range Facility (PMRF), and the continued long-term NASA use of 23 acres of State lands on Kaua'i, Hawaii in support of continued operations (including measurements of the

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 14, 2024

Brian J. Neilson
DAR Administrator

DAR# AR6675

Brief Description of Project

Earth's rotation and local land motion) at Kōke'e Park Geophysical Observatory (KPGO).

DAR# AR6675

Comments

Thank you for providing DAR with the opportunity to comment. During the EIS process, DAR would like to request that all streams, waterways, and ocean resources be delineated in the map of the proposed area. Any potential impacts should be discussed, any threatened and endangered species that can be found in the area should be identified, and mitigation measures should be proposed, as is typical of an EIS. DAR looks forward to reviewing the EIS after it is prepared.

Scoping Comment Letter 0035

linda oshiro <lindaoshiro555@gmail.com> 6/16/2024 2:02 AM

PUBLIC SCOPING MEETINGS

To info@pmrf-kpgo-eis.com Copy info@kakuaicamber.org

I was not able to attend the Kekaha meeting due to conflicting obligations.
I have lived in Hawaii 54 years, with the last 10 years next to the ocean in Kekaha. Your military activities, your electromagnetic surveillance of the coast, affects my personal energy field with excess stimulating energy that makes sleep difficult. It was proved your use of sonar affected the dolphins and whales. You seem not to care what your microwave radar towers or electromagnetic surveillance does to the human population
I am aware of the harm created by your activities and the target you have made of us and what a large landowner you have become and i am not happy with your presence
Linda Oshiro

Scoping Comment Letter 0036

Melissa Nash <melissasuenash@gmail.com> 6/16/2024 1:13 PM

PMRF EIS

To info@pmrf-kpgo-eis.com

Aloha,

My name is Melissa Nash, I am a resident of Kauai where my family homesteads in Moloa'a and teach island keiki and visiting families about beekeeping. We love the Aina and her creatures and are very concerned with the PMRF leasing the land within their own lease to big ag companies who grow GMO crops and spray harmful pesticides in large experimental quantities. This poison goes into the land, the water and touches everything in its path.

We would like to see the water on the west side restored to pre-plantation, natural routes, diversions removed and the land healed by Native Hawaiians. We would like to see this land used not for big ag to experiment, but to house local families who want to live close to the land and help heal it. We would like to see hemp grown, which can remediate the soil so it's safe for families to grow and live here.

We don't need big ag to lease and poison the land. But we do need places for local Hawaiian families to cultivate so they don't have to leave the island in the ever growing housing crisis.

Please stop working with the big ag corporations.

Sincerely,
Melissa Nash & family

Scoping Comment Letter 0037

Kauai Climate Action Coalition <kauaiclimate@gmail.com> 6/16/2024 9:05 PM

Input into EIS Scoping Process

To info@pmrf-kpgo-eis.com

Please see the attached comments from Kauai Climate Action Coalition (KCAC). Manalo,

Helen Cox, Chair

- KCAC Input to PMRF (5) (1).pdf (135 KB)

Kauai Climate Action Coalition
4266 Kalaheo Drive,
Kalaheo, HI 96741

Thank you for the notice of the Pacific Range Missile Facility (PMRF) and the Kōkeʻe Park Geophysical Observatory (KPGO) Environmental Impact Statement (EIS) scoping process.

Kaua'i Climate Action Coalition is an island wide organization with more than 165 members whose mission is to work collaboratively to educate, advocate and take direct action to address the climate crisis. We welcome the opportunity to provide input.

We are sure you are aware that the US military is one of the world's largest greenhouse gas polluters, and we appreciate all efforts to mitigate this enormous problem. However, input to the scoping of the EIS is made difficult because the public has no information regarding the full scope of PMRF activities. Our comments below, therefore, are made from a limited understanding of PMRF's current activities and their impacts.

1. Conduct an environmental assessment of its natural lands and those adjacent to it and compare the findings to the last EIS. Have the coastal lands, near shore environments, and wetlands been enhanced or degraded? Have endangered species increased or decreased from the last EIS? How will negative effects be mitigated?

2. Assess emissions from all sources at PMRF and report those transparently.

3. Analyze and mitigate the pollutants produced at PMRF. The missiles, the diesel trucks, the tow motors, the aircraft, the commuter cars, the laundry equipment, the electricity used, etc. etc. If there are secret military test projects that pollute, they should be looked at and mitigated confidentially. Please tell us if there is laser and electromagnetic research there, because of the massive expenditure of electricity that is used. Please include the submarine and drone boat emissions also. What will be done to mitigate these impacts?

4. We are aware that PMRF biologists removed healthy Kiawe forests. Consider a native lowland forest restoration project that would both remediate the soil and capture at least some of the massive amount of CO2 emitted by PMRF?

5. The land around PMRF was formerly agricultural, much of it still in agriculture. What are the Navy's intentions and what are the impacts?

6. Assess the impacts climate change will have on PMRF and how these will be mitigated. Impacts will include sea level rise, increased wildfires, water issues, and heat, among others.

7. Inspect and possibly remove or replace the fuel storage tanks at PMRF since they are the same generation as those at Red Hill. Findings should be shared with the public.

8. Explore how PMRF can partner with local organizations to increase the sustainability and resilience of the island.

9. Consider whether PMRF needs all the land it currently holds and reduce the land holdings in the lease if possible.

Submitted by Helen A Cox, Chair, Kaua'iClimate Action Coalition
kauaiclimate@gmail.com

Scoping Comment Letter 0038

Bonnie Bee <recallbherenow@hotmail.com> 6/16/2024 10:17 PM

PROPOSAL of proposed real estate agreements with the state of Hawaii of 8,348-acres at Koke`e, Kaua`i of the Crown Lands ▪ Draft EIS ▪ ▪ U.S. Navy: PMRF / NASA: KPGO

To dlnr.land@hawaii.gov Copy info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> • Jim Albertini <jimalbertini@gmail.com>

---

17 June 2024

PO Box 30848
Anahola HAWAI`I 96703-0848

ATTENTION Russell Tsuji
Department of Land and Natural Resources
(*DLNR*)
State of Hawaii
1151 Punchbowl Street - Room 220
Honolulu, HAWAI`I 96813

ATTENTION Kerry Wells, Project Manager
RE EIS PMRF and KPGO

Naval Facilities Engineering Systems Command, Hawaii, Environmental OPHEV2
400 Marshall Road, Building X-11
Pearl Harbor, HAWAI`I 96860

RE Proposed draft Environmental Impact Statement (***dEIS)*** ■ U.S. Navy Missile Range Facility and Geophysical Observatory Real Estate Environmental Impact Statement

To: Whom It May Concern :
DLNR state of Hawaii AND U.S. Navy / *PMRF* **AND** National Aeronautics and Space Administration (NASA)

NO ACTION - We adamantly agree:

~ NO ACTION ~

"***NO***" to **ALL** proposed real estate agreements with the state of Hawaii for the Pacific Missile Range Facility (PMRF) and the Koke`e Park Geophysical Observatory (*KPGO)*

- *NO* continuance of long-term lease of the Department of Defense use of the 8,348-acres of Crown Lands - The Ceded Land Trust Koke`e, Kaua`i
- **NO** to the *SPECIFIED* 410 acres, which the U.S. Navy PMRF
- **NO** to NASA proposal of continuance of the leasing ***AND*** long-term use of the 23-acres of Crown Lands - The Ceded Land Trust Koke`e, Kaua`i - of named: NASA Koke`e Park Geophysical (KPGO)

ABSOLUTELY `A`ole

NO to the proposed action: in the
PMRF-KPGO in the draft Environmental Impact Statement (dEIS)

We look forward to acknowledgement of Our participation and implementation of
NO ACTION ALTERNATIVE
...

Please keep Us abreast of any/all updates in the dEIS scoping process via U.S.Postal Service (USPS) - regarding Our comments - of the draft Environmental Impact Statement scoping process

ALOHA `ĀINA

MAHALO Loa

Sincere ALOHA,

Bonnie P Bator `Ohana
(Keana`aina, Keli`ikoa, Kai`aokamalie & Kai)

- Screenshot_20240508_162158_Drive_1715272447253_1715272613837_1715272741390_1715273701289_1715406.jpg (94 KB)

Approving Agency / Accepting Authority	State of Hawai'i, Department of Land and Natural Resources Russell Tsuji, (808) 587-0419, dlnr.land@hawaii.gov 1151 Punchbowl Street, Room 220, Honolulu, HI 96813

Scoping Comment Letter 0039

Louise Sausen <tutumamasau@gmail.com> 6/17/2024 2:54 PM

To info@pmrf-kpgo-eis.com

I oppose Navy acquisition of 8,000 acres of CROWN LANDS 🔥👺🔥 Especially when Kanaka are being PRICED OUT OF OUR ONE HANAU 🔥👺🔥 Keep Hawaiian lands for Hawaiian people 🌺🌟💞🌟🌺

Scoping Comment Letter 0040

Regina Gregory <reginagregory24@gmail.com> 6/17/2024 2:59 PM

comment

To info@pmrf-kpgo-eis.com

Scoping comments, PMRF

1. Linking to the NASA Observatory seems like another military land grab. Instead, you should include your environmental impacts on Niʻihau, Kwajalein, the 1,100-square-mile instrumented underwater range, and the broader ocean impact area.

2. Excluding people from the land is a major impact. A nearly 8,000-acre "buffer zone" is excessive and could be reduced. Your assessment should also include options to retain less land, e.g., omit Kamokalā Ridge, the Mānā Water Well, Miloliʻi Ridge, and/or Makaha Ridge.

3. The Hawai'i Supreme Court has already ruled that leasing public lands to the US military is not in keeping with DLNR's duty to safeguard that land. It also runs counter to the "reconciliation" called for in Public Law 150-103. The sale of public lands is strongly discouraged by law. In fact, the entire US military presence in Hawai'i rests on a shaky foundation of illegal occupation.

4. The "no action" alternative is clearly preferable environmentally. Under this option, the Navy should not be allowed to simply abandon it, but be required to clean it up. That will create a lot of jobs!

5. Leading STEM students into military careers should not be considered a benefit. It takes them away from more useful endeavors like renewable energy, water management, and other forms of progress toward sustainability instead of destruction.

6. Economic impacts should include not only income from DoD, but also loss from alternative uses of the land.

Regina Gregory

Scoping Comment Letter 0041

Gordon, Laney (she/her/hers) <gordon.laney@epa.gov> 6/17/2024 3:06 PM

EPA Comments on Notice of EIS for PMRF KPGO

To info@pmrf-kpgo-eis.com Copy Shari.A.Miller@nasa.gov <shari.a.miller@nasa.gov>

Hello,

Please see EPA's attached scoping comments on the PMRF KPGO project above. Thank you for the opportunity to review this document. Feel free to contact me if you have any questions regarding the comments.

Sincerely,

Laney Gordon

Laney Gordon (she/her)
Life Scientist & NEPA Reviewer
Envrionmental Review Section
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street (CED-2-1)
San Francisco, CA 94105

(415) 972-3562 | gordon.laney@epa.gov

- 2024-06-17_EPA Scoping-PMRF+KPGO NOI_Kauai-DoD-NASA-signed.pdf (486 KB)

REGION 9
SAN FRANCISCO, CA 94105

June 17, 2024

Ms. Kerry Wells
Project Manager
Naval Facilities Engineering Systems Command
400 Marshall Road
Pearl Harbor, Hawai'i 96860

Subject: EPA Scoping Comments for the Notice of Intent to Prepare a Draft Environmental Impact Statement for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Agreement, Kauai, Hawaii

Dear Kerry Wells:

The U.S. Environmental Protection Agency has reviewed the above-referenced document. We are providing comments pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. It requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement.

The U.S. Navy and the National Aeronautics and Space Administration (NASA) intend to prepare a Draft Environmental Impact Statement (DEIS) to evaluate the potential environmental impacts of the proposed real estate agreements with the State of Hawai'i for the Pacific Missile Range Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO) project. The Department of Defense utilizes 8,348 acres of State lands on Kaua'i for operational continuity and sustainment of the PMRF, including military training, testing, and facility operations. The continued long-term NASA use of 23 acres of State lands is in support of continued KPGO operations, including measurements of the Earth's rotation and local land motion.

Review Summary

The Preparation Notice of the DEIS is primarily a disclosure document for a real estate action to be negotiated with the State of Hawai'i. As such, EPA did not identify significant public health, welfare, or environmental quality concerns to be addressed in the Draft EIS. For your consideration, we have recommendations regarding environmental justice and climate change, to enhance disclosure and further distinguish impacts in and around the project area. Please see the attached detailed comments.

The EPA Appreciates the opportunity to review this NOI for the Draft EIS for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory. If you have any questions, please contact me at (213) 244-1834 or contact Laney Gordon, the lead reviewer for this project, at (415) 972-3562 or gordon.laney@epa.gov.

Sincerely,

FRANCISCO DONEZ

Digitally signed by FRANCISCO DONEZ
Date: 2024.06.17 10:33:09 -07'00'

Francisco Dóñez
Acting Manager
Environmental Review Section 2

Enclosures: EPA's Detailed Comments

cc: Shari Miller
National Aeronautics and Space Administration

Environmental Justice

We appreciate the discussion in the Preparation Notice of the Draft EIS regarding the history of land tenure in Hawai'i, documented in the Land Use section and Appendix A. There are continuing effects from this history that weigh on members of the Native Hawai'ian community, expressed through comments during scoping, that are not captured in the document. These remarks were reiterated during public meetings for the project on June 4, 2024; some of the public's concerns were also reported in the *Kauai Now News* on June 9, 2024.[1] These comments reference Native Hawai'ians' cultural attachment to the land, and stress that their native lands were wrongly taken. The comments specifically cite the $1.00 fee paid by the Army in 1964 for the 65-year lease as an example of inequity.

Recent Executive Orders direct the entire Federal Government to advance equity and racial justice for underserved communities, including Native Hawaiian/Pacific Islander communities. Executive Order 13985: *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (January 20, 2021) directs federal agencies to evaluate whether their policies produce racially inequitable results when implemented, and to make the necessary changes to ensure underserved communities are properly supported. Executive Order 14031: *Advancing Equity, Justice, and Opportunity for Asian Americans, Native Hawaiians, and Pacific Islanders* (May 28, 2021) seeks to eliminate barriers to equity and justice for these populations. We also note that the Department of Defense's Equity Action Plan, pursuant to EO 13985, includes a strategy "to advance equity and rectify past harms" resulting from environmental and other impacts from defense activities on ancestral lands.[2] These directives should be considered in the context of the project, to help guide decision-making.

Additionally, the guidance document *Promising Practices for EJ Methodologies in NEPA Reviews*[3] may be helpful to consult when determining how non-chemical stressors (e.g., chronic stress related to environmental or socio-economic impacts) amplify impacts. As stated in that document, "The cumulative ecological, aesthetic, *historic* (emphasis added), cultural, economic, social, or health effects of a proposed action can arise from and also include non-chemical stressors" (p. 32).

Recommendations: In the Draft EIS, consider how the permanent loss of State land through fee simple retention differs from retention through non-permanent mechanisms such as leases, etc., and discuss impacts related to these land retention mechanisms. Consider how these mechanisms could be received by the public, including communities with environmental justice concerns, in the unique historic context of the affected environment. We recommend that conclusions regarding environmental justice impacts attempt to reflect the mental and emotional health impacts and the larger cumulative sense of loss and injustice, and not only the impacts to specific resources (e.g.,

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[1] Public meetings held on June 4-6, 2024 and public opinion interviews available at: https://kauainownews.com/2024/06/09/navy-nasa-want-to-renew-kauai-leases-west-side-locals-show-support-opposition/

[2] DoD Equity Action Plan p. 8. Available: https://media.defense.gov/2022/Apr/13/2002976515/-1/-1/0/DOD-EQUITY-ACTION-PLAN.PDF.

[3] Report of the Federal Interagency Working Group on Environmental Justice & NEPA Committee, March 2016. Available: https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf.

transportation, recreation/hunting, or to cultural resource access). After reviewing and identifying these additional military land use impacts on environmental justice, please identify corresponding mitigation measures in the Draft EIS. Examples could be establishing regular communication channels to strengthen relationships with the Native Hawaiian community, and in consultation, exploring other State-owned military lands that may be underutilized and could be repurposed for community use.

Climate change effects/incorporating resilience

The newly added PMRF site is very close to the shoreline. Should this site be selected, the facilities will experience various climate change effects that can bear on both the project and on environmental resources. According to the State of Hawai'i Sea Level Rise Viewer[4], the shoreline of Kauai at the project site will experience sea level rise and coastal erosion that approaches the development site. The FEMA flood hazard zone already begins to encompass the site, and additional hazards associated with storm waves are indicated. Modeling results for the 1%-annual-chance coastal flood zone with 3.2 feet of sea level rise, which estimates coastal flood extents for wave-generating events including tropical storms, hurricanes, tsunamis and other severe wave events, show the entire PMRF within the coastal flood zone. This indicates increased vulnerability to coastal event-based flooding by the year 2100. Please refer to the West Kaua'i Community Vulnerability Assessment[5] for more information.

We understand it is Department of Defense (DoD) policy to identify and assess climate change effects on the department's mission, and to consider them when developing plans. According to a DoD report[6], a decision that involves enduring or permanent infrastructure meant to perform at least 50 years into the future, is mission critical with limited alternative options, and represents an irreversible commitment of resources, would dictate a consideration of higher-end sea level rise scenarios.

Recommendations: EPA strongly recommends that the design of the PMRF alternative include components to protect the asset from climate change effects. Prioritize preservation and restoration of natural landscape features, such as coral reefs, beaches and dunes, floodplains, and wetlands, that have the inherent capacity to avoid, minimize, or mitigate the impacts of climate change. Discuss applicable nature-based project elements that can be integrated into the project design, exemplified by the U.S. Army Corps of Engineers "Engineering with Nature" program.[7] Discuss both gray and green infrastructure, and combinations of both. Discuss whether increasing dune restoration would protect both the project and important cultural sites. Discuss how current groundwater pumping at PMRF will affect the project, and if updating pumping practices would increase resilience.

It is also important to acknowledge, as noted in the West Kauai vulnerability assessment, that sea level rise threatens the West Kauai transportation system, including the Kaumuali'i Highway, which is vulnerable to sea level rise (i.e., erosion, passive flooding, wave inundation), heavy rainfall, and storm events. According to the specific Navy environmental stewardship activities (pg. 1-13) and the Best Management Practices (BMP) in Table 2-6 of the Preparation Notice, there are plans to establish a "monitoring program for the nearshore environment of the PMRF to inform future management decisions and monitor changes over time." The Draft EIS should assess the environmental impacts to

[4] Sea Level Rise: State of Hawai'i Sea Level Rise Viewer. Available: https://www.pacioos.hawaii.edu/shoreline/slr-hawaii/
[5] University of Hawai'i Sea Grant College Program, West Kaua'i Community Vulnerability Assessment, June 2020. Available: https://seagrant.soest.hawaii.edu/wp-content/uploads/2020/06/WKCVA-Final-Report-June-2020.pdf
[6] DoD Directive 4715.21, section 1.2; Section 2.2j
[7] U.S. Army Corps of Engineers, Engineering With Nature website. Available: https://ewn.el.erdc.dren.mil

relevant resources that would occur as a result of project elements necessary for climate change adaptation. It is important that these project elements be explored now and not be deferred, as time may be needed to develop nature-based project features. Hardening features such as sea walls and revetments should be included only after nature-based solutions have been fully explored. We believe full use of the NEPA process will be especially informative for this project and if undertaken well, can prove particularly valuable for decision-makers. Please let us know if the EPA can assist in this endeavor through early involvement during the NEPA process.

Scoping Comment Letter 0042

Raymond Catania <april8nineteen18@gmail.com> 6/17/2024 5:27 PM

Against Rimpac war exercises and Israel's active inclusion

To info@pmrf-kpgo-eis.com

Aloha,
Went to the June 6 presentation at Sheraton Coconut Beach. Our Hawaii ocean environment and Kanaka cultural resources and it's protection are being used to build U.S. military superiority in the Pacific and Asia- "from the ocean bottom up to the atmosphere." But also, Israel/IDF inclusion is part and parcel of U.S. dominance in the Middle East and the continued subjugation of the Palestinian people. Good and sincere people who believe in ocean/environmental and Kanaka cultural issues have been recruited for this purpose. Diplomacy and non-violence is the answer. What happened to civilians in Nagasaki and Hiroshima are historical lessons we should take to heart. This is "green imperialism."
Mahalo,
Ray Catania Puhi

Scoping Comment Letter 0043

Consent for storing submitted data
True

First Name
Ruta

Last Name
Jordans

Add Me to the Project Mailing List
Yes

Street
6345A Kipapa Road

City
Kapaa

State
HI

Zip code
96746

Email
zwknow@gmail.com

Organization/Affiliation (if any)
Zero Waste Kauai

Comments

See attached file

Add Attachments (optional)

pmrf_and_kpgo__eis_scoping_letter_from_zwk_copy.docx

Submitted on
06/16/2024

PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells,

Thank you for the opportunity to make suggestions that should be considered by PMRF in its Real Estate Environmental Impact Statement.

Zero Waste Kauai was founded in 2006. Our mission is to educate, inspire and assist the government, businesses, residents and visitors of Kauai in transitioning to a zero waste society and to advocate policies and implement programs that move Kauai toward a zero waste society.

Zero Waste Kauai is most concerned about environmental impacts of waste generation and disposal. We appreciate the large solar array at PMRF which has decreased the use of fossil fuels to produce energy. However, we would ask you to include in the EIS what PMRF is doing to reduce the amount of waste generated, specifically on how waste such as recyclables, organics, and construction and demolition wastes are reduced and/or diverted from the landfill and how PMRF is promoting a circular economy.

Please consider the following issues in the EIS:

The Kekaha Landfill is due to be full in the next two to six years. Making less trash or diverting usable materials would extend the life of the landfill. Zero Waste Kauai has consulted with PMRF in the past on diversion opportunities, specifically for organics, but, to our knowledge, no action has been taken. Diversion of organics (food waste and green waste) from the landfill to composting eliminates the production of methane in the landfill and produces a soil amendment which holds water and makes more nutritious soil. PMRF has a large population of residential and commuting personnel, which produces much usable food waste.

According to https://www.defense.gov/News/News Stories/Article/Article/612710/ Pentagon officials said that climate change is a security risk because it degrades living conditions, human security and the ability of governments to meet the basic needs of their populations. It is obvious that the risk is even bigger for islands in the middle of the Pacific Ocean. Recycling helps combat the climate crisis by limiting the use of raw materials and reducing waste going into landfills. https://www.colorado.edu/ecenter/2023/12/15/impact-recycling-climate-change" How will the EIS address these issues?

Ruta Jordans, Zero Waste Kauai President, zwknow@gmail.com

Scoping Comment Letter 0044

Consent for storing submitted data
True

First Name
Maria

Last Name
Walker

Add Me to the Project Mailing List
Yes

Street
PO Box 33

City
Kapaa

State
HI

Zip code
96746

Email
maria.makaleha@gmail.com

Organization/Affiliation (if any)

Comments

Aloha, I am strongly in favor of Option 3 in the plan for the future of the properties currently being used by the Navy and NASA. The history of military presence in Hawaii has clearly shown that the US government has no respect for the land, water, or people of Hawaii; that they are willing to exploit natural resources with impunity and leave behind toxic waste that they refuse to clean up; that they desecrate historical and cultural sites with no consideration for this place, and that they occupy these lands while paying no reasonable taxes or rent for them. The coast at Mana should be open and free for residents and visitors to use, and the rest of the west side land needs to be saved for agriculture. I strongly support the Navy and NASA vacating the lands they are using, cleaning them up thoroughly, and returning the properties to their natural condition before they were developed. i do not believe there are any positives for our residents, visitors, or island land and waters in continuing to have this military presence on Kaua'i. Thank you for reading my comment.

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0045

Consent for storing submitted data
True

First Name
James

Last Name
Trujillo

Add Me to the Project Mailing List
Yes

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Kapa'a

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96746

Email
07trujillojames18@gmail.com

Organization/Affiliation (if any)

Comments

Aloha, I recommend the 3rd option- allow the lease to expire and return the land to the state and the people of Hawai'i The demilitarization of Hawai'i, while supported by some but opposed by most, is a modern day reality in our post colonial world. As America struggles with it's white supremist past, the peoples of the Pacific will continue to seek balance and harmony with the natural world. This will be made possible by taking the first steps in decommissioning the PMRF along with other military installations and facilities in the state. Reconsolidation of military operations in the state and limited to O'ahu is the next step in de-occupying Hawai'i. Mahalo for considering this testimony on the draft EIS for PMRF & KPGO. Again, I favor the 'No Action' option and encourage you to look favorably on Option 3 With respect and aloha, James Gerard Trujillo Makaleha, Kapahi, Kaua'i

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0046

Consent for storing submitted data
True

First Name
Kevin

Last Name
Houck

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Yes

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4762 menehune road

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96796

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kevin@drinkmorekava.com

Organization/Affiliation (if any)

Comments

Hi, Please reopen and remove restrictions to coastal access of the entire mana shoreline for coastal access for surfing, Kayaking, canoeing, fishing, walking, horseback riding and cultural practices. The pmrf guest card program is a great program that provides some access to some of the shoreline but it does but provide access to all of the areas that are recognized as public shoreline by the State of Hawai'i set forth in Hawai'i Revised Statutes Chapter 205 a Coastal Zone Management (attached) regarding the public access right to coastal areas. There are still several miles of ka moaena hohola o mana that are not accessible. Thanks for your time and stewardship of this area, and have a nice day. Aloha, Kevin

Add Attachments (optional)

Submitted on
06/17/2024

legislature shall be binding upon actions within the coastal zone management area by all agencies, within the scope of their authority. [L 1977, c 188, pt of §3; am L 1979, c 200, §3; am L 1989, c 356, §6]

§205A-5 Compliance.

(a) All agencies shall ensure that their rules comply with the objectives and policies of this chapter and any guidelines enacted by the legislature.

(b) All agencies shall enforce the objectives and policies of this chapter and any rules adopted pursuant to this chapter. [L 1977, c 188, pt of §3; am L 1979, c 200, §4; am L 1989, c 356, §7; am L 1993, c 258, §3]

§205A-6 Cause of action.

(a) Subject to chapters 661 and 662, any person or agency may commence a civil action alleging that any agency:

(1) Is not in compliance with one or more of the objectives, policies, and guidelines provided or authorized by this chapter within the special management area and the waters from the shoreline to the seaward limit of the State's jurisdiction; or

(2) Has failed to perform any act or duty required to be performed under this

Scoping Comment Letter 0047

Consent for storing submitted data
True

First Name
Steve

Last Name
Parsons

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STEVE@TEAMPARSONS.COM

Organization/Affiliation (if any)
Kauai EV and Kauai Climate Action Coalition lead

Comments

Aloha EIS Team, While I understand this is just the beginning of the EIS process, I also get, at a high level, that we as a species have a very short window of time to decarbonize our world before unmanageable tipping points are crossed leading to UNIMAGINABLE Climate Chaos! Kauai is one of the Crown Jewels of our planet regarding natural beauty, ecosystems that provide life to us, and it is under massive assault! Conversely, It is also an example of what can be done to fight climate change Faster than anyone thinks possible. Our power coop KIUC, went from about zero renewable energy about 20 yrs ago to about 60% today with plans to 100% RE within 10 yrs. Great, now we just need to electrify everything ASAP to eliminate all fossil fuel burning on Kauai. In fact, Kauai Climate Action Coalition along with the Surfrider Foundation Kauai Chapter, and Zero Waste Kauai are launching an #ElectrifyKauai campaign in July that we'd like PMRF to possibly collaborate on, but at a minimum we are asking PMRF to join and promote this campaign. Imagine, PMRF and KPGO to be the first in the nation to go all electric faster than anyone thought possible. We ask that you go really big in your thinking and brainstorm how you can unleash millions of Green Infrastructure dollars to accelerate the electrification of Kauai. Like the solar battery array you did with KIUC and AES, but BIGGER!!!! Perhaps like what joint base Hickam just launched last week. .https://cleantechnica.com/2024/06/14/powering-10000-homes-ameresco-celebrates-the-commercial-operations-of-kupono-solar-at-joint-base-pearl-harbor-hickam/ In the meantime, use Hawaii grown Biodiesel from Pacific Biodiesel for everything that is diesel to see an immediate 85% reduction in air pollution! As a former Gulf war vet that has 50% service related disability for serving in a war for Oil, would encourage the Department of Defence to look at fast electrification as a national defence strategy, a financial cost saver and climate mitigation plan including harding infrastructure all in one! Lastly, be wary of

the s-curve like acceleration of ever worsening effects of climate change. For example, we have had approximately 1ft of SLR (Sea Level rise) in the last 80 yr. the next ft. is projected to come in the next 30 yrs., the next in 20...etc. However, there are wildcard variables our there like Thwiaites Glacier https://www.sciencefocus.com/planet-earth/doomsday-glacier-prevent-flooding will raise seas 2ft alone and then will allow another 10 ft of rise to release from all the ice it's damming. This could happen in decades, not centuries. So the sense of urgency that needs to be deployed ASAP cannot be understated. Here is what we are doing and we implore you to Join Us in the Electrify Kauai Campaign, by doing so you will aggressively attack your greenhouse gas emissions. Below is a draft of our #EK campaign. Please pardon any typos/grammatical errors as this draft is being launched on our website with QR code sign ups in early July. https://www.kauaiclimateactioncoalition.com/ #ElectrifyKauai A Big Mahalo for stopping by and learning how you can help fight against climate change and save money and the Aina by joining the #ElectrifyKauai Campaign! The scientists at UH (University of Hawaii), like Chip Fletcher, tell us we need to stop burning all Fossil Fuels ASAP and electrify Everything everything Why Electrifying Everything Is Not Just For Elites - CleanTechnica to avoid the worst effects of the Climate Crisis that is harming Kauai in so many ways: Increased drought, Wildfire risk like Maui, Massive Rain events causing historic flooding way more often like Kauai's 2018 floods, Losing our Native Birds due to a warming climate that allows mosquitoes to reach higher elevations, Sea Level Rise taking our beaches, our precious Coral Reefs are undergoing local and global mass bleaching events from record ocean heat and ocean acidification, and many more! Now the good news... By clicking the “Join Us” button your are taking ACTION and deciding to choose Clean-locally produced Electricity over dirty imported Fossil Fuels for your Transportation, in your Homes and businesses by Switching to Heat Pumps For Hot Water and Clothes drying, and by using electrical yard equipment, and battery backup Power banks instead of air polluting gas generators. The #EK campaign is an honor system and you choose when and how you switch. This is simply a resource to help you get there, faster than you think possible. Furthermore, we are not into climate-shaming around here. What we are into is Cleaner Air, Cleaner Oceans and by taking the following actions for your home and business, YOU are making a big difference! And a little more good news, most of the suggestions below have a significant money saving benefit including tax rebates. A complete resource on how to Go Electric and pay for it can be found at Rewiring America Now Join Us by going Electric in the following areas. #1 Go Electric with your transportation choices EVs (Electric Vehicles) Like Electric Cars Trucks to E-Bikes and E-Scooters. Many rebates available making Some nice EV’s are now 10k less of the avg. car price (https://cleantechnica.com/2024/04/12/tesla-model-y-model-3-cost-10000-less-than-average-new-car-price/) and cost way less in charging costs and maintenance. https://advocacy.consumerreports.org/wp-content/uploads/2020/10/EV-TCO-Overall-Fact-Sheet-FINAL-3.pdf or do your own ICEV (Internal combustion engine Vehicle) Vs EV comparison to see how much you can save per yr here: https://chooseev.com/savings-calculator/ #2 For Hot Water Heating Choose Heat HPHWH (Heat Pump Hot Water Heaters) Electrify government buildings, homes and businesses by promoting Heat Pumps!!! Here’s a funny locally made video to show how heat pumps work: Hawaii Energy - "Heat Pump" (2022) (caveat on the Video $500 rebate comes from KIUC for us) Usually, they are less than half the cost of solar hot water heaters. Fun efficiency Fact, If you switch out a reg.electric HWH with a HPHWH, you will save enough Electricity to power you car: https://cleantechnica.com/2023/10/06/a-heat-pump-water-heater-will-save-all-the-electricity-youll-need-to-power-your-electric-vehicle/ Think about how much time and money you could save by Going Electirc and keeping all that money on Kauai instead of sending it off island. If you rent, share this info with your landlord and direct them to this site. #3 If you can’t hang your clothes to dry, Choose a Heat Pump Clothes Dryers! (Some examples https://www.homedepot.com/b/Appliances-Washers-Dryers-Dryers-Electric-Dryers/Heat-Pump/120-volt/240-volt/N-5yc1vZc3q1Z1z17j86Z1z17ja4Z1z1dtqi?NCNI-5&sortby=price&sortorder=asc&onDisplay=false # For Cooking...Go INDUCTION, Baby! Induction appliances are up to three times more efficient than gas stoves, and up to 10% more efficient than conventional smooth top electric ranges. This improved efficiency performance can result in lower energy costs as well as lower rates of air pollution associated with energy generation Induction stoves are also free of the indoor air pollutants that come from gas stoves: burning gas for cooking produces nitrous oxides (NOX), carbon monoxide (CO), and formaldehyde (HCHO), which can have negative health effects

and exacerbate respiratory conditions. According to a 2022 study, 12.7% of current childhood asthma in the United States is attributable to gas stove use. .May 11, 2023 https://www.energy.gov/articles/making-switch-induction-stoves-or-cooktops #4 Electrify Tools and Yard equipment and get rid of the smelly gASS Powered ones. Americans use ~800 million gallons of gas per year mowing their lawns, producing tons of air pollutants. Lawn equipment emissions went largely unregulated until the late 1990's. As a result, they emit high levels of carbon monoxide, volatile organic compounds and nitrogen oxides, and produce up to 5% of the nation's air pollution More info and examples of how other areas of the country are making the switch fast can be found here: https://bedford2030.org/the-health-benefits-of-switching-to-electric-lawn-equipment/ #5 Electrify Food Trucks and street vendors and businesses/home power back up with Battery Backup systems that continue to fall in price and can be charged with solar. https://electrek.co/2023/10/23/food-trucks-are-switching-out-dirty-gas-generators-with-this-zero-emissions-option/ This is the right course of action for Cleaner Kauai and serves as a shining example to the world of what can be done and we believe Faster than anyone thinks possible and residents and visitors immediately start enjoying the benefit of Cleaner Air and Oceans! Everyone wants Clean Air! Check out the TOP TEN Benefits of Joining Electrify Kauai Campaign (*In no particular order) #1 Save Money Personally (Electricity is Cheaper than gas from EVs to Heat Pumps there are so many ways to Save! # Kauai County, Businesses and nonprofits Save money #3 Cleaner Air! Fossil Fuel Kills millions of people a yr: https://www.theguardian.com/environment/2023/nov/29/air-pollution-from-fossil-fuels-kills-5-million-people-a-year by By choosing electricity you are choosing cleaner air. #4 Cleaner Oceans! Surfers and Water people love their EVs, because they love the Ocean and fossil fuel pollution causes Ocean acidification that is killing our corals and other marine sea life along with ocean heatwaves: What is Ocean Acidification? #5 Feel good about doing your part for the next generations by acting now to mitigate the worst effects for them. https://climatecommunication.yale.edu/publications/distress-about-climate-change-and-climate-action/ #6 GOOD, Local Green Jobs are created when we go Electric. In Fact, training for this is being expanded at Kauai Community College so residents can train for a great profession! Electrical Installation and Maintenance Technology | Kauai Community College #7 EVs can also support grid and via bidirectional charging as well as be a backup power source for 1st Responders, Businesses and homes: https://cleantechnica.com/2023/10/13/electric-vehicles-play-a-surprising-role-in-supporting-grid-resiliency/ EV Charging And The Grid — The Truth Is Out There - CleanTechnica #8 This will eventually help to fight inflation by lowering demand for oil and gas and thereby prices! Ironically, this also helps folks that cannot yet afford or acquire an EV, by lowering gas prices. #9 Help Kauai continue to be a shining example to the world of how to be environmentally Pono! In a not too distant past.. Kauai's power generation was about 99% from burning fossil fuels to over 57% year round renewable energy today, and targeting 100% by 2033. This was accomplished faster than anyone thought possible and we will electrify Kauai faster than anyone thought possible, All this can happen, but only with your help, so Join us now! "Pledge Button Here"! End of Example... Please Act boldly to fight climate change!!! Mahalo, Steve Parsons, Lead for Kauai Climate Action Coalition and Kauai EV, Surfrider Foundation outreach team, Kauai Board of Realtors Green Real Estate & Sustainability committee Chair, Hanapepe Kauai 808-651-3232c REALTOR® Broker, RB-22077 kwBig Island | RB-23793

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0048

Consent for storing submitted data
True

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R.

Last Name
Chong

Add Me to the Project Mailing List
Yes

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Organization/Affiliation (if any)

Comments

Support: Alternative 1 - Extend Leases. Alternative 2 - Fee Simple Acquisitions. Disagree with Leaving Hawaii.

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0049

Consent for storing submitted data
True

First Name
keala heanani

Last Name
Carter

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Kalaheo

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96741

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kealacarter@gmail.com

Organization/Affiliation (if any)

Comments

None of the three alternatives reflect the change of attitudes towards the environment, frontline communities and limited land and water resources reflected in Hawaii today versus Hawaii in 1965. Using Alternative 2 as a more extreme option to make the continuance of another long lease occupying massive acreage, reflected in Alternative 1 seem reasonable is not a sincere effort to provide real alternatives. Instead, it creates a sham choice between alternatives like 1 and 3 that are obviously very improbable politically. Instead of using the Alternatives 1 and 3 to push people in the direction of Alternative 2, offering some real “alternatives” to the status quo and incorporating the environmental justice guidance of the Biden Administration could offer the community the chance to participate in the future of PMRF and the Kokee Observatory in a transformative way and also restore some of the trust lost from the Red Hill crisis. The community of the West Side of Kauai, particularly Kekaha, is distinct and has different values and needs that many of the other communities on the island. It is already an area disproportionately saddled with industry with less access to a variety of employment. In today’s climate, an alternative that considers benefit to the immediate communities living near the base, and consulting with them to articulate community benefits, which could include job training or apprenticeships, access to the cultural sites on the base and more investment in the frontline community and environmental remediation and enhancement, would signal that the Navy and NASA realize things are different now and want to consider ways to balance occupying such a huge section of land and limiting public access, with equity as a counterbalance. The renaming of the beach was a nice gesture but didn’t signify the type of substantive change needed in this lease renewal. It is important to consult closely with local organizations and Native Hawaiian Organizations to understand what the communities of West Kauai consider important instead of just pushing for another extremely long lease that pretends things are equal to what they were in the

1960s. The vast majority of people with the higher GS jobs are not from West Kauai and creating additional pathways into employment for folks nearest would both cut down on the gas of the many contractors driving in from Kapaa and elsewhere and allow one of the lowest per capita income neighborhoods in the State an opportunity to train for skilled, tech jobs. The current administration has published several Executive Orders on Environmental Justice initiatives and it would be refreshing to see the Navy and NASA demonstrate they are embodying these priorities and looking to avoid the mistakes very fresh on locals' minds.

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0050

Consent for storing submitted data
True

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Ruta

Last Name
Jordans

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Organization/Affiliation (if any)
Kauai EV, part of Hawaii EV

Comments

Thank you for this opportunity to discuss environmental issues on PMRF. Please apply whatever is appropriate for Kokee also, such as electric transportation. We are concerned about the large number of commuters driving back and forth, many even coming from the north and east of Kauai, with most driving ICE (internal combustion) vehicles. I happened to be in the Waimea Visitors Center one afternoon when PMRF let out, about 4pm. There seemed to be a never- ending stream of cars. I have also been on base and discovered the long distances from one part of the base to the other. Therefore we would like you to consider ways to lower the green house gas emissions from all those vehicles. Is there a charging infrastructure on base to encourage commuters to get electric vehicles (EVs)? Perhaps investigate an electric bus system to transport to and from PMRF to the east or north side - depending on how many people commute from there. Do you have those figures? PMRF could also have an inter-base electric bus system to reduce green house gas ICE driving within PMRF as well as up to Kokee.

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0051

Claire Tonry <clairetonry@gmail.com> 6/17/2024 10:26 PM

Comments on scoping materials

To info@pmrf-kpgo-eis.com

Please see the attached comment letter which I have also submitted via the comment form online.

Mahalo,
Claire

Work email: claire@smithandlowney.com

This email may contain attorney-client privileged communication. If you are not the intended recipient, immediately notify me that you received this message and delete all copies of it.

- Tonry PMRF NEPA Scoping Comments_240617.pdf (158 KB)

CLAIRE TONRY
P.O. BOX 1180, WAIMEA, HI 96796
clairetonry@gmail.com

June 17, 2024

Via Email **(info@PMRF-KPGO-EIS.com)**
Naval Facilities Engineering Systems Command, Hawai‘i
Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

Re: Comments on PMRF and KPGO EIS Scoping Process

Dear Ms. Kerry Wells,

I comment to express some of my concerns with the PMRF and KPGO (hereafter collectively referred to as "PMRF") NEPA scoping process. The two action alternatives currently proposed for consideration in the EIS are too similar, especially as to their impacts on the human environment. Additional, more distinctive action alternatives need to be considered in detail in the draft EIS.

Such additional alternatives should include meaningful conservation measures for Mānā, Kōke‘e and other affected areas, such as adding a conservation easement component to the expiring easements in renegotiations. The industrial pesticide and bioengineering research and development by multinational chemical manufacturers that is currently occuring under the exisiting easements is the source of significant toxic pollution which threatens local communities and state and federally protected rare and endemic species. The Navy should evaluate alternatives that ensure that agricultural use of the areas under Navy easements is no longer counterproductive to the federal agencies' responsibilities under the Endangered Species Act and their own regulations to, inter alia, protect and recover listed species. Further expanding the Kawai‘ele Bird Sanctuary (or similar reserve complex) should be examined across the action area for the same reason. The alternatives analysis should also include different approaches to reduce and eliminate the need for the Navy's overreliance on dirty diesel generators.

A revised scoping notice and the draft EIS should also examine how a broader range of alternatives would each interact with planned, foreseeable, proposed, and needed development and restoration on Mānā and surrounding areas, including: the West Kaua‘i Energy Project (as may be revised); infrastructure for Department of Hawaiian Homelands use; water diversions to support instream flows; groundwater use restrictions and needs; siting and construction of a new landfill; the ongoing need for pollution control improvements to the Mānā ditch system; and Kaua‘i's acute need for affordable housing.

It is difficult to comment on the scoping materials' summary of best management practices because these activities are not well-quantified, and it is unclear which activities pertain to the leased and easement lands. Please reissue the materials with these clarifications for further public comment.

Thank you for your consideration.

/s/ Claire Tonry

Scoping Comment Letter 0052

Roslyn Cummings <roslyncummings@ymail.com> 6/17/2024 11:59 PM

Memorandum: Naval Facilities Engineering Systems Command, Hawai'i Environmental OPHEV2

To info@pmrf-kpgo-eis.com • whs.pentagon.esd.mbx.white-house-suspense-desk@mail.mil • keira.kamiya@hawaii.gov Copy COK County Attorney <cokcountyattorney@kauai.gov> • COK Council <cokcouncil@kauai.gov> • dlnr@hawaii.gov • dlnr.cwrm@hawaii.gov • cchun@tghawaii.com • hirec@dcca.hawaii.gov

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Addition to correspondence
I would like to request for data on water: in the US NAVY and NASA contracted area(s)

Water amount usage, water quality, drainage, and maintenance

Along with data on the archeology surveys, with updated information on na Iwi kupuna ancestral bones (remains) found.

If a FOIA, or UIPA needs to be submitted please be as transparent as possible

Along with including the federal, state, and county laws that are being used.

In protection of our cultural heritage; hahai holoholo na, kahua, mahi'ai, lawai'a, mo'omeheu, mea ho'olako, and many more.

Waiwai is our wealth as na kanaka, kanaka oiwi, po'e kanaka, kanaka maoli

It is our natural resources, nutrients of which nourishes aina kino, imprints, and much more .

Wai is also very important to me

Mahalo,
Manawaiakea

ATTN: PMRF and KPGO
RE; EIS Project Manager, Ms. Kerry Wells 400 Marshall Road, Building X-11 Pearl Harbor, HI 96860

MEMORANDUM

From: Roslyn Nicole Manawaiakea Malama mare Cummings: Under Duress Kalaheo Ahupua'a, Moku O Kona, Kaua'i Mokupuni a Hawaiian Organization - U.S.DOI EMAIL: mana.eolakakouhawaii@gmail.com Post Office (Box 315), Kalaheo, Hawaii, 96741, in the Hawaiian Islands

SPECIAL Attention: File to the Current Director / CEO / CFO/ District Manager only
Not General Processing

TMK (1)9-9-001:000 (1)2-002-013-0000 is hereby request, and that a copy be furnished/transmitted to all participants for proof of title (chain of title) concurrent to County Tax/Bureau of Conveyances Bureau examines, records, indexes, and digitizes over 344,000 Regular System and Land Court documents and maps annually; issues Land Court Certificates of Title. Kauai County Code, Real Property Assessment Division's purpose is to assess all properties within the County of Kauai, which means, to provide accurate, uniform and timely assessment information; maintain the update ownership information; create and revise tax maps for all of Kauai's properties annually.

"alleged" Industrial; Conservation
NON-TAXABLE status Government: USA C/O NAVAL FACILITIES ENGINEER CMD ATTN: RE CONTRACTING OFFICER, AM1
258 MAKALAPA DR STE 100
PEARL HARBOR HI 96860 3121

The United States, State of Hawaii, County of Kauai Agents and Agencies own Oath to uphold U.S. Constitution, Laws and Treaties, makes them legally LIABLE through 42 USC §1983 for VIOLATIONS of the 1949 Geneva IV, 1907 Hague Conventions IV, USC 5 §1331, USC 18 §956, §957, §1623, §1651, §1652, §1653, §1660, §1661, §1091, §2441, §1654, Article 1 §8 and Article 6 §2 of the United States Constitution that are being committed here in the Hawaiian Islands / Sandwich Islands by use of:

1) (TMK) Tax Map Key Numbers to identify Location

2) (TMK) Tax Map Key Numbers to determine Title

3) (TMK) Tax Map Key Numbers to collect Taxes

4) (TMK) Tax Map Key Numbers to retain Jurisdiction over Internationally Protected Persons and Internationally Protected Property

5) (TMK) Tax Map Key Numbers to Pillage, Destruct, and Appropriate Protected Persons and Private Real Property not needed by Military Necessity

6) (TMK) Tax Map Key Numbers to authorize the carrying of deadly weapons such as Small Arms and Light Weapons.

Therefore, committing the act of PILLAGING, DESTRUCTION AND APPROPRIATION under Rules of War 1949 Geneva IV under 18 U.S. CODE §2441 and Violating his Majesty the King of the Hawaiian Islands Kamehameha III 1850 self executing ratified Treaty with the United States of America under U.S. Constitution Article 1 §8 and under U.S. Constitution Article 6 §2.

Agents and Agencies mentioned above must comply and are subject to Kamehameha III Treaty, Constitution, Laws, Civil and Penal Codes of the Hawaiian Islands once within three miles from the low water mark near the shore of the Hawaiian Islands.

That a confirmation of the Hawaiian Islands, Hawaiian Kingdom in continuity, nation-state status as a Neutral Power (May 11, 1854), be confirmed by the U.S. Department of the Navy (DOD) (U.S. Constitution Art. 6. Sec. 2 Treaties...supreme law of the land….", as the paramount guideline document, governing the conduct and mutual obligations of belligerents and neutrals regarding the "proposal" under consideration. That, the Neutral Power status of the Hawaiian Kingdom, precludes the U.S. Department of Defense (DOD), Dept. of the Navy from obtaining entry in to the Hawaiian Islands by way of the U.S. Federal Constitution Corporation, aka STATE OF HAWAII (SOH), Municipality TMK (tax map key - keyed only with no determination of ownership), whereby illegalities arise under the U.S. Constitution Art. 4. Sec. 3, "New States...no new states may be erected". That, the U.S. Corporation aka STATE OF HAWAII, officially exists only within the 10 mile square of Washington D.C. as permitted under the District of Columbia Act of 1887. That, the SOH adopted the U.S. Federal Constitution (Admiralty, Maritime, Equity), and therefore is already attached to the Consultor , i.e. U.S. Dept. of the Navy, as part of the administering authority, as a municipal and civilian militia, under GENEVA IV, and as such, any participant(s) thus far, who are attached, or function in any way, by or under the authority of the SOH or its Municipalities, MAY NOT UNDER ANY CIRCUMSTANCES be empowered to give CONSENT. That is how Section 106 Consultations are carried out in

“Indian country”, where consultation does not imply that consent is automatically given. That, the U.S. DOD recognize that “The Apology Law” U.S. Public Law 103-150, 23 NOv. 1993, Pres. W. J. Clinton, HAS NO FORCE OF LAW IN THE HAWAIIAN ISLANDS, but only within the contiguous territory of the 48 United States of America,, and cannot be lawfully used by the US DOD, as an automatic right of entry into the neutral territory of the Hawaiian Islands, currently under U.S. “belligerent” occupation, nor can the US DOD, impose any distinction, exclusion, limitation or restriction upon the neutrals of the Hawaiian Kingdom in continuity, by way of its Corporation aka State of Hawaii, that discriminates, in any way, against the Kanak Maoil, whose “national origins”, and vested rights in property and natural resources are perpetual and inherent, under the Hawaiian Laws promulgated in 1841-1842, by His Majesty Kamehameha III, Lahainaluna, Maui. nor their Power and Duties a a neutral nation-state in continuity. It is to be understood that, ALL State of Hawaii AGENCIES, or persons or organizations operating under that entity, under color of law or color of statute, doing business in the Hawaiian Islands, are to be considered as consultants to the US DOD Dept. of the Navy, and ARE CONFLICTED OUT, and DO NOT POSSESS THE AUTHORITY TO GIVE CONSENT to the “proposal” under consideration. Furthermore, the location of the proposed activities, by way of a SOH Municipal ‘tax map key, keyed only for the purpose of location and taxation, but with “no determination of’ ownership, CANNOT BE USED TO INFER OR IMPLY ANY TRANSFER OF THE TITLE TO THE TERRITORY OF THE HAWAIIAN KINGDOM, HAS EVER LAWFULLY OCCURRED, under the U.S. Constitution or the norms of customary international law.

Although the US Corp. State of Hawaii controls and disposes of the lands and resources within our neutral territory, any parties being of na kanaka descent, or having national origins” in the Hawaiian Kingdom automatically have availed themselves of their neutral status, power and duties, if those persons are a part of any agency or organization of the US Corp. SOH, and they shall be, considered as part of the Belligerent occupation force on land, as articulated in the provisions and prohibitions of GENEVA IV (US 1907 - THE HAGUE), for the purpose of, and in conjunction with this consultation under the U.S. NHPA. For the purpose of this consultation, the terms and conditions of GENEVA V, GENEVA V Chapter 14, the 1955 REVISED LAWS OF HAWAII, dictate the proper protocols, authorities, and entities that are empowered to ensure protection for the “ prehistoric and historic properties“CERTAIN RIGHTS OF THE PEOPLE - HAWAIIANA, under the Hawaiian Laws, and Hawaiian Kingdom Flag, second only to the Stars and Stripes of the U.S. that flies over the Hawaiian Islands neutral territory as the flag of a Belligerent, defined in GENEVA IVLaws and Customs of War on Land, and its Annex Regulations Concerning the Laws and Customs of War on Land (U.S. 1907 -THE HAGUE) - (See: “The Apology Law” “...act of war against a friendly nation….”, in violation of the U.S. War Powers Act, and international treaty violation US Constitution Article 6. Sec. 2) since Jan. 17, 1893, as that infamous act constituted a military insurrection in support of a coup demain.

FAILURE TO COMPLY WITH THE PRESENT TERMS , CONDITIONS, AND OBLIGATIONS SPECIFIED IN US DOD DIRECTIVE ON CONSULTATION UNDER SECTION 106 OF THE US NHPA VALIDATES THE CONTINUATION OF THE ONGOING CRIMINAL CONSPIRACY TO ILLEGALLY MAINTAIN CONTROL OVER THE HAWAIIAN ISLANDS & ARCHIPELAGO. As per the terms and conditions of the May 11, 1854 Hawaiian Kingdom - (Hawaiian Islands), signing of the “Declaration of Accession to the Principles of Neutrality”, and for the purpose of this “Consultation” shall be applicable: RIGHTS AND DUTIES OF NEUTRAL POWERS AND PERSONS IN WAR ON LAND (HAGUE) (1907-THE HAGUE, U.S. Senate advice and consent on March 10, 1908, U.S. Presidential ratification on Feb. 23, 1909, Entered into force on January 26, 1910, Proclaimed by the President of the United States on February 28, 1910, 36 stat.2310; Treaty Series 540 - Convention Respecting the Rights and Duties of Neutral Powers and Persons in Case of War on Land), as follows; CHAPTER I - Rights and Duties of Neutral Powers. Article 1. The territory of neutral Powers is inviolable. Article 2. Belligerents are forbidden to move troops or convoys of either munitions of war or supplies across the territory of a neutral power. Article 10. The fact of a neutral power resisting, even by force, attempts to violate its neutrality cannot be regarded as a hostile act. CHAPTER III - Neutral Powers (The nationals of a State which is not taking part in the war are considered neutrals.) Article 17. A neutral cannot avail himself of his neutrality: a - “...commits hostile acts against belligerent; b - “...commits act in favour of a belligerent, or by enlistment. Article 18. “...acts...not...considered as committed in favour of one

belligerent” b - Services rendered in matters of police, or civil administration. CHAPTER IV - Compensation shall be paid...in proportion to the material used, and the the period of usage. \ NOTE: Under the Provisions of Article 22. Notification - To the Netherlands Government that the territory of Hawaiian Kingdom in continuity, is under U.S. “Belligerent” occupation as of Jan. 17, 1893, by an “act of war”, U.S. President Grover Cleveland, before the Congress of the United States, requesting for notification to all other Powers of the Hawaiian Islands status as a “neutral territory”, under international law. In closing, i strongly recommend a review of these un-precidented circumstances that have arisen during thee NHPA Section 106 Consultations by the U.S. NAVY, (AS PART OF CINCPAC Headquarters), regarding the imposed use of U.S.National Historic Preservation Act (NHPA) in the “non-contiguous territory” (U.S.Public Law 99-239 Compact of Free Association Act of 1986 - Title II - Pacific Policy Reports), of the Hawaiian Islands, by reason that the U.S. Corporation aka STATE OF HAWAII CAN ONLY EXIST WITHIN THE 10 MILE SQUARE OF WASHINGTON D.C., THEREFORE THE USE OF THIS FEDERALLY CONSTITUTED CORPORATION TO IMPOSE U.S. LAW IN HAWAII IS A CONSTITUTIONAL VIOLATIONS UNDER ARTICLE 1 SEC. 8, ARTICLE 3. SEC. 8,, ARTICLE 4. SEC 3,. AND ARTICLE 6. SEC. 2. THE QUESTION ARISES AS REGARDS TO, BY WHAT CONGRESSIONAL AUTHORITY OR EXECUTIVE ORDER IS THE U.S. DOD CLAIMING TO HAVE AUTHORITY TO OCCUPY THE NEUTRAL TERRITORY OF THE KINGDOM OF HAWAII AND CONDUCT MILITARY TRAINING OPERATIONS.BY WAY OF U.S. LAW? IN SHORT, IS THE CONSULTATION PROCESS A TROJAN HORSE.FOR THE U.S. INDUSTRIAL MILITARY COMPLEX WHICH IS IN COMPLICITY WITH, AND HIDING BEHIND THE CONSTITUENT ELEMENTS OF THE ‘ILLEGALLY PROCLAIMED PROVISIONAL GOVERNMENT THAT COMMITTED ACTS OF TREASON ON JANUARY 17,1893? The foregoing comments conclude my submissions for the record of the consultations with the U.S. Department of the Navy, under the U.S. National Historic Preservation Act, Section 106, relating to the protection of historic places and properties, and the Hawaiian Kingdom accession to GENEVA Convention V concerning the RIGHTS AND DUTIES OF NEUTRAL POWERS AND WAR ON LAND, (US 1907, HK 1854). Respectfully submitted for inclusion into the minutes of the April 30, 2018 meeting in Honolulu.

NOTE: On 2 SEPTEMBER 2018, additions, corrections and clarifications to the original text sent to Capt. Rasmussen USN, in charge of consultation proceedings have been made and are included in this text to be forwarded to Sy Heen Shim, in his capacity as a “protected person under international law, as a descendent of the “Chiefs and People” of the Hawaiian Islands, under Hawaiian Law, promulgated 1841-1842 Kamehameha III, Lahainaluna, Maui.

As a matter of law the government officials in the Hawaiian Islands, being part of the People/citizenry of the United States political subdivision aka State of Hawaii, under the adoption of the U.S Federal Constitution, have sworn an oath “to support and defend” both the United States and state of Hawaii constitutions, which requires them to ensure the native tenants due process of law, the effect of which has been for decades that the State and counties have allowed the destruction of hundreds if not thousands of Hawaiian village sites and “places of worship” throughout the islands, often to support private, and for profit land developments, at times by so-called “Emergency Proclamation" that inadvertently deprive civil liberties; in correlation to the unlawful enforcement of policies of apartheid by distinction, exclusion, restriction and limitation, based on national origin, race, color, religion and ethnicity, by way of the term “native Hawaiian" meaning any descendant of not less than one-half part of the blood of the races inhabiting the Hawaiian Islands previous to 1778, who is then subject to the right of the (US)State of Hawaii via Section (7), ARTICLE 2. Hawaiian Homes Commission sub section 201, to the right of the State of Hawaii, by way of the 1978 Constitutional Convention and election of November 7, 1978, to hold the unfettered ability to “regulate” fundamental human liberties of “subsistence” as well as their “cultural and religious” practices, constituting a “Deprivation of rights under color of law, under Title 18 U.S. Code sub-section 242, Deprivation of vested property rights held by native tenants under color of law, under /title 18, U.S.Code Section 241, lending to a Deprivation of due process under the color of HRS (Hawaii Revised Statutes 708.814.5, perpetrating a long-term pattern and practice of “Genocide” through selective enforcement of law, under Title 18 U.S. Code sub-section 1091, Chapter 50AGENOCIDE. CONSTRUCTIVE NOTICE is, also, filed regards to the “purpose(s)” of H.B. 2693, in respect for “Native and Part-native” Inhabitants, so situated within the physical maritime and territorial boundaries

of the Ahupuaa (District) Moku, Mokupuni, being a part of the Royal Domain of the Hawaiian Kingdom Monarchy, with interests restricted, and subject to the reservation of rights affirmed in 1839 by His Majesty King Kamehameha III, which are included as being part of “Hawaiian National usage”, by Her Majesty Queen Liliuokalani on November 25, 1892, (the “crown land” title carries certain specific terms and conditions, i.e. the fee-simple interest is “inalienable”, and “private”, (the United States Congress in 1993 affirming the unlawful seizure of the “crown lands” by the Republic of Hawaii, and transfer to the United States as “without the consent of or compensation to…their sovereign government…”.), and “subject to the rights of tenants…”, and who never “voluntarily surrendered…rights in the National lands…”, and who are “protected persons”, in accordance with the FOURTH (IV) GENEVA CONVENTION (US Signatory 1907 - HAGUE, and the (ICCPR) International Covenant on Civil and Political Rights, Adopted by United Nations (UN) General Assembly Resolution 2200A (XXI) of 16 December 1966 entry into force 23 March 1976, UN Charter.in accordance with Article 49, being upheld under the United States Constitution Article 6, Section 2., per the RLH 1955 - Volume I, Chapter 14, sub Section 14-8 Powers and duties, “Any law to the contrary notwithstanding…”, being consistent, and in conformity with United States policy relating to U.S.C. TITLE 16 - CONSERVATION, PART A -Historic Preservation Programs NOTICE is hereby given with respect to a request FILED 5 FEBRUARY 2024, for assistance/discretion of the United States Secretary of Interior to determine “that a major aspect of a State program is not consistent” with United States Code TITLE 16 - Part A - Historic Preservation Programs, currently under administration, within the non-contiguous Pacific area of the Hawaiian Islands, due to the absence of a Historic Preservation Review Commission as required, under USC TITLE 16, in order to properly qualify, certify and oversee the certification of historic preservation programs, of any municipality acting as a “local government” including the State of Hawaii, in order to effect compliance with the “requirement of equal footing” per USExec.P. 3309, and RLH 1955 - Volume I, Chapter 14, sub Section 14-8 Powers and duties, “Any law to the contrary notwithstanding…, in order to be consistent in regards to the administration of “Historic Preservation Programs”, under U.S.C. Title 16 - CONSERVATION, Part A, within the “State system”, in lieu of: A. The complete absence of an actively functioning, effective and sufficiently qualified Historic Preservation Review Commission, within the current State system, being administered in the, non-contiguous Pacific area of the Hawaiian Islands, as required to properly qualify, certify and oversee any “local government”, including the “State of Hawaii” in the administration of Historic Preservation Programs, per Sec. 470-1(b-A (b) -2 (B), having given rise to: 1. widespread disruption, irreparable destruction, desecration and defiling of historic sites, cultural properties and places, throughout the Hawaiian Islands; 2. disregard for family honors, rights (burials); the endangering of the lives of persons, their private property, religious sites, interference with and disregard for religious convictions and practices; 3. acts forbidden, unauthorized and malicious methods of seizure, pillage, and destruction, lending to the willful contamination and destruction of watersheds, groundwater reservoirs wetlands, rivers, forests, historic irrigation systems, estuaries and agricultural estates; 4. destruction, desecration, defiling, mutilation and molestation of institutions dedicated to religion, charity, education, the arts and sciences, being acts that are normally “forbidden”, under the Fourth IV Geneva Convention, Respecting the Customs and Laws of War on Land, and its Annex Regulations Concerning the Customs and Laws of War on Land, which should be made the subject of legal proceedings; 5. neglect on the part of the “United States, its political subdivision State of Hawaii, Municipalities and its People” to effect compliance with regard to the “equal footing” requirement of the U.S. Executive Proclamation 3309, Pres. Dwight D. Eisenhower (1959), by blatantly undermining, disregarding, avoiding and continually failing to implement and put into effect administrative structures necessary to comply with the purpose and stipulations in the Revised Laws of Hawaii 1955, Volume I, Ch. 14, CERTAIN RIGHTS OF THE PEOPLE - HAWAIIANA, Sections 14-1 thru 14-11, being representative of the “chief governing authority”; a) having brought about conditions intended to bring about the destruction of the group, as a whole and in part, b) having caused a near complete collapse of the indigenous economy, identity and way of life, in correlation to the unlawful enforcement of policies of apartheid by distinction, exclusion, restriction and limitation, based on national origin, race, color, religion and ethnicity, by way of the term “native Hawaiian” meaning any descendant of not less than one-half part of the blood of the races inhabiting the Hawaiian Islands previous to 1778, who is then subject to the right of the State of Hawaii via Section (7), ARTICLE 2. Hawaiian Homes Commission sub section 201, to the right of the State of Hawaii, by way of the 1978 Constitutional Convention and election of November 7, 1978, to hold the unfettered ability to “regulate” fundamental human liberties of “subsistence” as well as their “cultural and religious”

practices, constituting a “Deprivation of rights under color of law, under Title 18 U.S. Code sub-section 242, Deprivation of vested property rights held by native tenants under color of law, under /title 18, U.S.Code Section 241, lending to a Deprivation of due process under the color of HRS (Hawaii Revised Statutes 708.814.5, and a long-term pattern and practice of “Genocide” through selective enforcement of law, under Title 18 U.S. Code sub-section 1091, Chapter 50A - GENOCIDE.

CC: United States Department of Interior Honorable Secretary, Deb Haaland Attention: U.S. Department of Interior, Solicitor General 1849 C. Street, N.W. Washington D.C. 20420 United Nations, Human Rights Committee, Geneva, Switzerland

To: DEPARTMENT OF THE NAVY Commander United States Pacific Fleet 250 Makalapa Drive Pearl Harbor, Hawaii 96860-3131

SUBJECT; concerning Consultation on the “proposal to continue military readiness activities in the Hawaii Training and Testing Ground (HSTT) Study Area.”effects of undertakings in Hawaii, pursuant to Section 106 of the National Historic Preservation Act (36 CFR Ss800), for proposed training, testing and readiness activities located within TMK: (1)9-9-001:000*, in order to “identify historic properties, potential impacts, assess possible effects, and seek ways to avoid, minimize or mitigate any adverse effects on historic properties.” Dear Sir, You may, or may not, be aware of the historical fact that on May 11, 1854, His Majesty King Kamehameha the Third (III), by way of His Exc. Robert C. Wyllie signed the “Declaration of Accession to the Principles of Neutrality” as requested by a U.S. President. As such, the Hawaiian Kingdom, “...territory of neutrals is inviolable.”, and the peace and security of our Hawaiian Kingdom (a nation-state in continuity), and the world for that matter, has come into question, due to the lack of international recognition of the Hawaiian Islands as a neutral territory under belligerent occupation (Attachment A) in addition, there are related matters concerning our Maritime Jurisdiction, as a Neutral Power, lying within one marine league (three miles), from the coast of each of our islands (Hawaii-U.S. Convention of May 16, 1854), out to the 200 Mile EEZ, in respect for the protection and hospitality of our ports, harbors and roads, equally extended to all belligerents, so long as they respect our neutrality. In the context of this consultation, as a neutral hors de combat, ”historic properties” are defined as, the entire territory belonging to the Hawaiian Kingdom, under belligerent occupation. It is my goal, under this obligation, lest I avail myself of my neutrality, to define the extent of our powers and duties with respect to the conduct of belligerents, and ensure compliance with the terms pertaining to neutrality, and fulfill our mutual obligations and responsibilities as Parties to the Convention, towards the protection of historic properties to enhance and maintain peace and security throughout the Hawaiian Islands, Hawaiian Archipelago

Respectfully submitted, Manawaiakea a Wahine Maoli, (per June 17,1897, letter of protest filed by HRM Queen Liliuokalani, at U.S. State Department Domiciled in the Hawaiian Islands, as Part of the Polynesian Triangle

Scoping Comment Letter 0053

Kamalei Stovall <kamaleistovall@gmail.com> 6/17/2024 11:18 PM

No action- do not renew lease

To info@pmrf-kpgo-eis.com

Aloha kākou,
As a concerned resident and Native Hawaiian, I support the “no action” option to not renew the lease for the land that the military is currently occupying as the Pacific Military Range Facility. My concerns are as follows:
1. The Navy has not done their due diligence in advertising necessary information to the community.
2. The Navy is not allowing the community to speak as a group so that we may hear each other’s views.
3. The Navy is hosting the genocidal Israeli Defense Forces during RIMPAC and training them to continue to murder innocent civilians in Gaza with impunity.
4. The Navy has restricted access to Nohili (Barking Sands) to Native Hawaiians for cultural purposes such as gathering foods, medicines, lei materials, and spiritual and mental health practices.
5. The Navy has not disclosed which Native Hawaiian Organization has approved its Cultural Impact Assessment.
6. The community wants far more transparency in how the military is caring for the environment. For example: the impact on marine life and surrounding human communities caused by missile testing, and the safety and soundness of fuel storage containers.

For these concerns, and more- I strongly recommend the “no action” option to NOT renew this lease.

Sincerely,
Lauren Kamalei Stovall

Scoping Comment Letter 0054

From: Joan Heller
To: info@PMRF-KPGO-EIS.com
Subject: Lease Renewal Unwarranted
Date: Monday, June 17, 2024 3:16:03 PM

It's time to discontinue the training of
killing other beings, along with the destruction of Earth's global water, air and land resources!

With the historical American mindset towards global military dominance, funded through tax-payer/voter funds, you turn-the-tide

I, a Kauai resident

From: Joan Heller
To: info@pmrf-kpgo-eis.com
Subject: Fwd: Lease Renewal Unwarranted
Date: Monday, June 17, 2024 3:44:00 PM

From: Joan Heller <myoho@hawaii.rr.com>
Date: June 17, 2024 at 3:15:46 PM HST
To: info@pmrf-kpgo-eis.com
Subject: Lease Renewal Unwarranted

needs to begin with dis-mantling It's time to discontinue the training of killing other beings, along with the destruction of Earth's global water, air and land resources! With the historical American mindset ...
... turn-the-tide and close the Mana base by rescinding your lease renewal! I, a return Kauai resident (post-WW2 generation) has learned about the violent nature of the colonial American (Euro-centric) culture!

American militaristic training is antithetical to all life...the armed-forces leadership is out-of-control as is the President and most of Congress!

Down-grade Military Industry,
Joan Yamamoto

The NAVY tried the same tactics as developers...

- Poor advertiesement
- Divide and conquer AKA don't let us speak as a group

So, time for us to talk story!

Here is some of the mana'o shared at the meeting to **talk to your friends about** and **consider in your testimony!**

Testify: info@PMRF-KPGO-EIS.com by June 17

Scoping Comment Letter 0055

Consent for storing submitted data
True

First Name
Kyle

Last Name
Kajihiro

Add Me to the Project Mailing List
Yes

Street
2560 Campus Road, George Hall 305

City
Honolulu

State
HI

Zip code
96822

Email
kyle.kajihiro@gmail.com

Organization/Affiliation (if any)

Comments
See attached comments.

Add Attachments (optional)

2024.6.17_pmrf_kpgo_scoping_comments.pdf

Submitted on
06/17/2024

Kyle Kajihiro, Ph.D.
Ethnic Studies, University of Hawai‘i at Mānoa
kkajihir@hawaii.edu

June 17, 2024

Scoping Comments on the Pacific Missile Range Facility (PMRF) and Kōke‘e Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement

Historical and Cultural Context

Public Law 103-150 recognizes two key facts: (1) the importance of land to Kānaka ‘Ōiwi, and (2) as a condition of the Admissions Act, public trust lands of the Hawaiian Kingdom were to be held by the State for, among other things, “... the betterment of the condition of Native Hawaiians.” Further, Public Law 103-150 finds, in relevant part, “Whereas, the indigenous Hawaiian people never directly relinquished their claims to their inherent sovereignty as a people or over their national lands to the United States, either through their monarchy or through a plebiscite or referendum; Whereas, the health and well-being of the Native Hawaiian people is intrinsically tied to their deep feelings and attachment to the land” (P.L. 103-150 1993). This historical context must inform all analysis of the social and cultural impacts of the proposed action.

Purpose and Need Statement

The Navy / NASA Environmental Impact Statement (EIS) is an improper instrument for guiding the State of Hawai‘i’s decision making about public trust lands

The Navy and NASA, as petitioners, and the State, as trustee for the lands in question, have fundamentally different interests and obligations. As the petitioner, the Navy and NASA have a conflict of interest with regard to their roles as the sponsors of the EIS because they have an interest in downplaying adverse impacts on State lands.

The State on the other hand, has a trust obligation to protect the land and environment, including cultural resources, especially on Hawaiian Trust Lands (i.e. “Ceded Lands”). The State cannot make a responsible decision about these lands without considering its own land

management obligations and what care the land requires. Thus, the State must conduct its own planning process to determine the best stewardship practices for the lands at Nohili and Kōkeʻe.

In the case *Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case*, Judge Gary Chang ruled:

> Public trust lands are state-owned lands that are held for the use and benefit of the people in general of the State of Hawaii. The State of Hawaii is the trustee of these public lands in the public trust. The trustee of the public lands trust has the highest duty to preserve and maintain the trust lands. This duty is broadly coined in the concept of "malama 'aina"—to care for the land. (*Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case* 2018)

Therefore, the State's primary duty is to mālama ʻāina.

The issue at the core of the purpose and need statement in the EIS must be the responsibility as lessee to care for the land as defined by the terms of the lease. In the case *Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case*, Judge Gary Chang ruled:

> Public trust lands are state-owned lands that are held for the use and benefit of the people in general of the State of Hawaii. The State of Hawaii is the trustee of these public lands in the public trust. The trustee of the public lands trust has the highest duty to preserve and maintain the trust lands. This duty is broadly coined in the concept of "malama 'aina"—to care for the land. (*Clarence Ching and Mary Maxine Kahaulelio vs. Suzanne Case* 2018)

Therefore, the Navy and NASA as lessees are governed by the terms of the lease and easements to mālama ʻāina.

The purpose and need statement must be rewritten to reflect this duty to clean up and restore the land it leases from the state. The court has found that Navy and NASA activities have caused environmental damage in violation of the terms of the lease and that the State has a duty to enforce the terms of the lease consistent with the principle of mālama ʻāina (care for the land).

Compliance with the terms of the lease or easement agreements

Provide a list of and reports for all site inspections conducted by the Department of Land and Natural Resources of the State lands and seas leased or encumbered by easement by the Navy. This is important to know whether the State has been fulfilling its trust obligations for these public trust lands.

Alternatives Statement

In line with the purpose and need to mālama ʻāina, the *preferred alternative* should be based on this obligation. The alternatives analyzed must include analysis of conducting the proposed actions elsewhere. Please provide all alternatives studies conducted by the Navy for the proposed actions.

Affected Environment

Defining the scope of the affected environment requires analysis that extends beyond the immediate region of influence (ROI) along *temporal* and *spatial* axes.

Temporal Scope: Environmental effects of past, present, and foreseeable future activities: In order to provide an accurate assessment of environmental impacts for proposed actions, an EIS must begin with a thorough understanding of the baseline and current ecological and cultural conditions of the affected site.

Baseline conditions at Nōhili and Kōkeʻe are the environmental conditions which existed *prior to military use of the land*. A reasonably accurate picture of baseline conditions can be determined by extrapolating from historical records, oral histories, cultural, archaeological, and geophysical studies, and biological studies of relatively intact native ecosystems in neighboring areas which have similar environmental conditions.

Understanding *current environmental conditions* at Nōhili and Kōkeʻe requires a comprehensive study of the *cumulative environmental effects of all past military activities* at these sites as well as the activities of other land uses, such as commercial agriculture and genetically modified crops. This study must consider effects of the proposed action that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives, including how the proposed action may compound or increase the adverse effects of past military activities.

Spatial Scope: Region of Influence (ROI): The geographical scope of analysis, or region of influence (ROI) must include environmental effects of proposed military activities on all lands within the installation boundaries, the neighboring areas, as well as more distant sites which are operationally linked to the proposed action and affected environment.

According to the Hawaiʻi Military Land Use Master Plan (See Figure 1), the Navy has nine leases and easements on Kauaʻi that expire between 2028 and 2030. These include an

Ocean Right of Way Lease totalling 7680 acres of ocean space, and a 1,167 acre lease on Niʻihau, as well as leaves and easements on Mahaka and Miloliʻi ridges. These leases and easements should be included in the scope of analysis.

Service	Location	Island	Acres	Exp Year	Notes
Army* (Figure A-1)	Pōhakuloa Training Area (PTA)	Hawai'i	22,971.0	2029	Saddleback Road Lease
	Kahuku Training Area	O'ahu	1,150.0	2029	Parcel Lease
	Kawailoa Training Area (Poamoho)	O'ahu	4,390.0	2029	East Wahiawā Parcel Lease
	Mākua Military Reservation (MMR)	O'ahu	782.0	2029	Wai'anae Parcel Lease
Navy (Figure A-2)	PMRF	Kaua'i	391.65	2029	Main Base Leases
	PMRF	Kaua'i	7,445.41	2029/2030	Main Base Easements
	PMRF - Offshore	Kaua'i	7,680.0	2029	Ocean Right of Way Lease
	Kamokala Ridge	Kaua'i	88.83	2029	Lease
	East of PMRF Main Base	Kaua'i	0.29	2029	Water Well Lease
	Mākaha Ridge	Kaua'i	203.1	2030	Lease
	Mākaha Ridge	Kaua'i	42.21	2030	Easement
	Miloli'i Ridge	Kaua'i	0.015	2030	Lease
	PMRF Ni'ihau	Ni'ihau	1,167.0	2028	Test Vehicle Land Recovery Site Lease
Air Force (Figure A-3)	Ka'ena Point Satellite Tracking Station	O'ahu	86.72	2029	Lease
	Ka'ena Point Satellite Tracking Station	O'ahu	51.47	2029	Easement
	Kā'ala Air Force Station	O'ahu	1.8	2028	Lease
	Kōke'e Air Force Station	Kaua'i	8.45	2030	Lease
	Remote Maui Experimental Sites	Maui	6.17	2021/2023	Leases
	Maui Space Surveillance Site	Maui	5.0	2031	Lease
		Total	46,471.1		

*Army expiring easements are not included in the table as they are small in scale, routine, and not associated to the 65-year lease.

Table 1 – Expiring Leases and Easements

Land Use

The EIS should incorporate a complete history of land title and land use with maps. A central issue is the Navy and NASA's use of public trust lands (also known as "ceded lands"). The status of these lands are unique in that they are held in trust for a number of public purposes defined by the Statehood Act. The EIS should explain the decision making process, with relevant documentation, for the initial negotiation and approval of the leases and easements.

State Land Use Regulations: The EIS must analyze the land use zoning and permitting requirements.

Cultural Resources

To date, investigations into the number and significance of cultural sites have been superficial. The EIS should include a thorough inventory of the historic sites in the area, discussion of the cultural significance of Nohili and Kōkeʻe, in relation to the larger cultural landscape, and a discussion as to how the condition of these sites has changed while the Navy and NASA has used these lands. Kānaka ʻŌiwi and the general public currently only have limited access to the affected parcels, and therefore, are denied the right to fully enjoy and conduct cultural, religious, or subsistence gathering practices until the lands are cleaned up and restored.

The EIS must incorporate a comprehensive Cultural Impact Assessment (CIA). Pursuant to the Hawaiʻi Environmental Policy Act (HEPA), and Articles IX and XII of Hawaiʻi State Constitution government agencies are required "to promote and preserve cultural beliefs, practices, and resources of native Hawaiians and other ethnic groups" (Guide to the Implementation and Practice of the Hawaii Environmental Policy Act, 2012, 11). The CIA must include an analysis of adverse cultural impacts on Kanaka ʻŌiwi and other cultural practices by military activities at Nohili and Kōkeʻe which have occurred in the past, and which may occur in the future as a result of proposed military activities.

The DEIS must incorporate a rigorous Kapaʻakai analysis of the proposed actions, which must include,

> (1) the identity and scope of "valued cultural, historical, or natural resources" in the petition area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area; (2) the extent to which those resources -- including traditional and customary native Hawaiian rights -- will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken by the LUC to reasonably protect native Hawaiian rights if they are found to exist. (Ka Pa`akai O Ka`aina v. Land Use Commission, 94 Haw. 31. 2000. 36)

Cultural Landscapes: The CIA must consider the entire connected cultural landscape including ocean and mountain spaces. Hawaiʻi law recognizes that in addition to built structures, a cultural resource may also be a natural feature of the landscape, such as a mountain, hill, rock, tree, stream, or animal which has cultural significance to Kānaka ʻŌiwi. This study should include an in-depth cultural landscape study (CLS) and ethnographic survey (ES).

The Papakū Makawalu methodology, developed by the Edith Kanakaʻole Foundation, would be appropriate to employ in the assessment of the cultural meanings and significance of the affected area. Identify and discuss the significance of place names. Analyze the relationships between geographic features and moʻolelo. Analyze how contemporary cultural practices may be affected by the proposed actions.

Cultural Sites and Resources: Affected sites include, but are not limited to alanui (trails), ahu and heiau (shrines and temples), puʻu (hills), rocks, caves and lava tubes, plants and animals used in traditional healing, hunting grounds, sites for harvesting birds, sites for observation and study of celestial bodies, burial sites, quarries and workshops for tools, and sources of water. Discuss the significance of the sand dunes and wetlands. Discuss the significance of the westernmost orientation of this landscape for funerary spiritual practices.

Cultural Practices: Pursuant to the Navy's and NASA's lease agreements, easements, and legal obligations, the Navy and NASA must mālama ʻāina to restore ola (life) and create a safe and healthy environment for the well-being of flora, fauna and all interdependent life forms including the native tenants / hoa ʻāina / beneficiaries. The native tenants must include, but are not limited to: hunters, fishers, and gatherers, lāʻau lapaʻau (herbal medicine practitioners), cultural and religious/spiritual practitioners and their relationship to the ʻāina, surfers, canoe paddlers, oceangoing canoe voyagers, and hula practitioners. Adverse impacts on cultural practices include, but are not limited to restrictions on access due to security or safety restrictions, the destruction of cultural or religious sites, the destruction of environmental resources used in cultural practices, and the disruptions of the view plane and serenity of the area caused by missile launches, lasers, vehicle and aircraft noise, and smoke and dust.

Conduct a comprehensive survey of past and current Kanaka ʻŌiwi cultural practicesin the ROI. Identify the cultural sites and resources needed for the revival and/or perpetuation of these cultural practices. What steps must be taken to improve the ability of Kānaka ʻŌiwi and the public to have safe, meaningful, and regular cultural access to these areas? How will the Navy and NASA increase the opportunities for Kānaka ʻŌiwi and the public to safely participate in mālama ʻāina (environmental and cultural restoration activities) in the ROI?

Biological Resources

Native Ecosystems: The EIS must adopt an ecosystem-scale approach to analyzing the effects of the proposed military activities on the natural resources. This means studying the components, structures, and functioning of affected ecosystems. Individual species cannot be considered in isolation from their ecosystems. Nor can they be considered as separate from cultural relationships with humans. Ecosystems and species that inhabit them are also cultural resources for Kānaka ʻŌiwi.

Threatened and Endangered Species: It is imperative that all rare, threatened and or endangered organisms within the area remain protected. The EIS must incorporate a complete inventory of all rare, threatened and/or endangered plant, insect and animal species including those identified as Native Hawaiian ʻaumakua and kinolau (divine bodily manifestations of Hawaiian deities) within the ROI and neighboring areas which are likely to be affected by proposed activities. Affected species must include marine species that could be affected by military training associated with the facility.

Invasive Species: The EIS should fully disclose the extent of invasive species threats at the ROI. What is the inventory and extent of invasive species threats at Nohili and Kōkeʻe? What invasive species have been introduced or spread by military activities? For example, has the coconut rhinoceros beetle, fire ants, or other noxious weeds been detected in the base? What is the Navy and NASA doing to control these threats? Please provide any incident reports of damage to endangered species or habitats by invasive species. Please provide any incident reports of accidental releases or introductions of invasive species, such as: hitchhiking fountain grass or fireweed on vehicles or personnel or the introduction of invasive species such as fire ants, rodents, snakes, spiders, rhinoceros beetles as stowaways on cargo boats, vehicles, and aircraft.

Wildfires: The EIS must provide a complete history of wildfires at PMRF and KPGO, including the dates, causes, extent of damage, and responses. How are wildfires documented, and where is this information reported and archived? What have been the impacts on fires to protected species and habitats? What have been the impacts of fires on cultural sites and resources? How have fire incidents affected the transformation of the ecology? How are biologists and cultural resources specialists documenting the impacts of fires?

Socioeconomics / Environmental Justice

Environmental Justice Analysis: As mentioned above, the greatest environmental justice impacts will be borne by Kānaka ʻŌiwi who have the most profound connection to the lands in question. The environmental justice analysis in the EIS must not use demographic data to claim that there are negligible environmental justice impacts because all ethnic groups are considered minorities on Hawaiʻi island. The key considerations in determining environmental justice impacts include: Who has the longest history, deepest connections, and profound knowledge about Nohili and Kōkeʻe? Who has the greatest stake and is most directly affected by the environmental and cultural impacts there? Who has suffered the greatest historical injustice, cultural disintegration, and dispossession as a result of the history of the U.S.-backed overthrow of the Hawaiian Kingdom and the subsequent seizure of Hawaiian land by the federal government? Whose cultural practices are most adversely affected by Navy and NASA activities in Nohili and Kōkeʻe? Who is exposed to the greatest risk of exposure to toxins, injury, or death in the exercise of their cultural practices? How are subsistence hunters, laʻau lapaʻau practitioners, and Kanaka ʻŌiwi religious practitioners affected by the access restrictions and hazards at PMRF and KPGO?

Economic Costs: Some questions about the economic impacts of the military activities: What are the costs of clean up and restoration of environmental damage caused by military activity? What is the depreciation in the land's value as a result of military activities? How does the loss of value adversely affect the general public and Native Hawaiians as beneficiaries of the public land trust? What are the opportunity costs? What economic value can be generated by restoring the ecological and cultural integrity of Nohili and Kōkeʻe?

Noise

Noise is one of the major complaints about military activities. The EIS should include consultations with residents of neighboring communities about the effects of noise. This includes the impact of noise from overflights of aircraft. How does noise affect the value of homes? How does it affect quality of life? What public health affects might be induced by chronic noise? How are veterans' mental health affected by the noise? How does noise affect the behaviors of animals, especially endangered species?

Air Quality

The EIS must provide thorough data on air quality at PMRF. What kinds of documentation and reporting is conducted when there are incidents that may adversely affect air quality, such as a fire or training event? What emissions of air pollutants have been reported at PMRF and KPGO? What toxins or hazardous substances have been detected in airborne particulate matter during fires or training events?

Water Resources

Nohili and the Māna plain was known to be a site of abundant wetlands. How have military and associated agricultural activities in easement lands affected the wetlands of this area? What is the history and status of aquifers in the vicinity of Nohili? Where are the wells? What is the history of water usage? What has been the impact of past uses of aquifers?

Rocket propellent has been associated with perchlorate contamination in many sites in the United States. Perchlorate has been detected in Nohili. What is the status of perchlorate contamination, and what is being done to clean up this hazard and prevent its release?

Provide a comprehensive analysis of the PFAS contamination at PMRF and KPGO. Include incident reports of all releases, detections of PFAS in the water, soil, and biota, and the status of clean up efforts.

Natural Hazards, Geology, and Soils

What are the hazards due to climate change and sea level rise? What are the risks of tsunamis and hurricanes? What plans exist for preventing contamination of the environment in the event of flooding?

Climate

Provide a comprehensive audit of the fossil fuel use and carbon emissions of PMRF and KPGO from all sources, including but not limited to the emissions of offshore exercises, rocket launches, flights to and from the facility, ground transportation, and power generation.

Visual Resources

Wide open spaces and views of the mountains is part of the significance of this landscape. What are the Kanaka ʻŌiwi visual resources in the ROI? What is the cultural significance of different view planes?

Public Facilities and Infrastructure

What are the effects on the quality of roads? What are the impacts of military use of harbor facilities? How are military activities affecting recreational use of the beach, mountain, and ocean resources?

Toxic and Hazardous Substances

The EIS must include comprehensive information characterizing toxic and hazardous substances in soil, groundwater, surface water runoff, uptake in plants and animals, air emissions, marine environments and species, and air borne particulate matter. The Contaminants of Concern (COC) that should be investigated include, but are not limited to:

- Munitions and explosives of concern (MEC);
- Metals, including lead from small arms munitions, mercury, beryllium, cadmium, arsenic, copper, aluminum,
- Depleted uranium (DU), strontium 90, and other radioactive contaminants,
- PCBs, dioxins and furans,
- Energetics and explosive constituents and their byproducts,
- Per- and polyfluoroalkyl substances (PFAS) which is commonly found in fire-fighting foam,
- Percholorate, a common chemical in rocket fuels,
- Petroleum, oil, and lubricants (POLs),
- Volatile organic compounds (VOCs), including solvents, pesticides, and herbicides,
- Benzene, Toluene, Ethylbenzene, and Xylene (BTEX) and Polycyclic Aromatic Hydrocarbons (PAHs),
- Asbestos,
- Various kinds of air pollution emissions.

Cumulative Impacts

The EIS must incorporate data and analysis of the environmental effects of all past military activities at PMRF and KPGO, including:

- A comprehensive list of all military activities ever conducted at PMRF and KPGO, including any nuclear, biological, and chemical weapons tests and military activities by other service branches and foreign militaries.
- A comprehensive study of toxic and hazardous substances and their effects on the human and natural environment.

- A description of all munitions used, the quantities used, the explosive yields, contaminants associated with these munitions, the extent of unexploded ordnance contamination, and the results of any removal actions.
- A comprehensive report on wildfires, their causes, responses, and environmental consequences.

The EIS must also take into account the combined environmental and cultural impacts of all past, present, and reasonably foreseeable future projects at or near the project area.

Provide a list of all of the public and private users of the facilities at PMRF and KPGO, including the defense aerospace contractors, U.S. and foreign entities, and University of Hawai‘i programs such as the Applied Research Laboratory.

Thank you for your attention to these comments.

Scoping Comment Letter 0056

Consent for storing submitted data
True

First Name

Last Name

Add Me to the Project Mailing List
No

Street

City

State
HI

Zip code
96822

Email

Organization/Affiliation (if any)

Comments

No consent. No continued military presence at PMRF. Please restore the land the military occupies to its natural state, return the lands to the native Hawaiian people, and leave.

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0057

Consent for storing submitted data
True

First Name
Sommer

Last Name
Kauakahi

Add Me to the Project Mailing List
Yes

Street
1055 Kamalu Road

City
Kapaa

State
HI

Zip code
96745

Email
kauwela87@gmail.com

Organization/Affiliation (if any)

Comments

I support alternative 3: no action alternative. Come spring of 2025, there also needs to be much more advertising/public service announcements made to the public. Banners, radio announcements, newspapers, and social media, so the larger community can also know and be aware. One of my reasons for support in alternative 3, may fall under environmental justice. I am acutely aware of the mental stress & anxiety it gives many Kanaka Maoli, myself included, to see the illegally occupying powers that have no Treaty of Annexation illegally occupying the ceded lands of the lawful Hawaiian Nation. Not only should birds & plants be included in the EIS, but also the reef, the limu, the coral, the opihi limpets etc which are all important natural & cultural resources.

Add Attachments (optional)

Submitted on
06/17/2024

Scoping Comment Letter 0058

JOSH GREEN, M.D.
GOVERNOR

KEITH T. HAYASHI
SUPERINTENDENT

STATE OF HAWAI`I
DEPARTMENT OF EDUCATION
KA 'OIHANA HO'ONA'AUAO
P.O. BOX 2360
HONOLULU, HAWAI`I 96804

OFFICE OF FACILITIES AND OPERATIONS

June 7, 2024

Ms. Kerry Wells, PMRF and KPGO RE EIS Manager
Naval Facilities Engineering Systems Command,
Hawaii Environmental OPHEV2
400 Marshall Road, Building X-11
Pearl Harbor, Hawaii 96860

Re: U.S. Navy Pacific Missile Range Facility and NASA Kokee Park
Geophysical Observatory Real Estate Environmental Impact Statement

Dear Ms. Wells:

Thank you for your letter dated April 30, 2024. Based on the information provided, the proposed project will not impact the Hawaii State Department of Education facilities.

Should you have any questions, please contact Cori China of the Facilities Development Branch, Planning Section, at (808) 784-5080 or via email at cori.china@k12.hi.us.

We appreciate the opportunity to comment.

Sincerely,

Roy Ikeda
Interim Public Works Manager
Planning Section

RI:ctc

c: Facilities Development Branch

Scoping Comment Letter 0059

Public Scoping Meeting Comment Form

Date: June 8, 2024

Please submit comments for the scoping process by June 17, 2024. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

- In person at a public scoping meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by June 17, 2024 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

Aloha, my 'ohana and I attended one of your meetings recently, and after careful review of your shared info, I would like to add some comments. I would offer that the Navy has met with the local community in past years over RIMPAC and SONAR concerns, listened to passionate testimony from the People, but to little or no avail. The recent debacle of Red Hill has done little effect on boosting the people's confidence of the Navy's good intentions toward fostering a benevolent relationship with the community of Hawaii, although we are addressing specifically Kauai at the moment. I have tremendous respect for our Military outside of the operations of the Military Industrial Complex.

(over)

Please provide your mailing address to receive future notifications about the project.

1. Name: S. Strom
2. Organization/Affiliation (if applicable): _____
3. Mailing Address: susiwailua@gmail.com / Kauai, HI 96766

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

Please turn in this form at a public scoping meeting, submit online at PMRF-KPGO-EIS.com, send by email to info@PMRF-KPGO-EIS.com, or mail to:

Naval Facilities Engineering Systems Command, Hawai'i, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

** Please Print Clearly **

which we all hope is not operating in continuity, but rather, an honest, transparent Military which serves and protects its citizens and environment first and foremost, instead of 'forever wars' and invasions.
NASA has tainted itself with deception, and has become an endless vacuum of our tax dollars, with little to show for its gargantuan costs, and zero contribution toward the betterment of humanity. What NASA does now, Space Force and Starlink can do better. Therefore, I am making the following recommendations:

(1) The possible renewal of Navy Lease lands reduced to the 410 acres in actual use only, and with stipulations that require the Navy to expand their role and duties to: (A) Utilize an allotted time schedule to provide for humanitarian services to the public, such as: Infrastructure assistance, re-generation assistance with lands and expansion of permanent housing facilities, agriculture, and garden communities to those in dire need of generational homes, clean water, Energy installation, and other purposes which lend strength, overall Health, and continuity of the local communities, among other seafaring, protective duties including (B) Assisting with organic regeneration activities of our ocean, waters, marine life, beaches, etc.

(2) NASA transfer its technological infrastructure over to the oversight of Space Force, and phase out NASA's presence here on Kauai completely.

It is my recommendation that NASA's lease be NOT renewed, and Alternative 3: No Action Alternative be administered.

Mahalo for your outreach, and enabling us to respond to your projections.

Respectfully,

S. Strom + Ohana
Kauai, HI 96766

YOUR INPUT MATTERS
Visit PMRF-KPGO-EIS.com

Scan QR code for project website

Scoping Comment Letter 0060

Commenter Name: Susan Strom

Comment: This is Susan Strom. I live on the island of Kaua'i, and I just wish to share my concerns about the renewal of a lease for NASA, in particular, and this being that NASA has a sordid history of Nazi infiltration in its genesis. And there has been very little that has been done over these many years since NASA's beginning -- NASA's beginning that benefits humanity in any way. We have been, as citizens, funding this organization for many, many years. And the money seems to appear to just disappear down a black hole. I have not seen with NASA's existence here in Kaua'i any real benefit to help uplift humanity and help humanity here, but we've all been funding it without our own consent. So I don't feel that its lease is something that should be considered for renewal at this time. Thank you.

Scoping Comment Letter 0061

Commenter Name: Alice Parker

Comment: Okay. Alice Parker, Lihue. Okay. Ready? I'm concerned about the education of the staff's children. The schools here are not very good, I feel. So how are they going to augment the inadequacies of our local schools? Okay. That's it. Thank you so much.

Scoping Comment Letter 0062

Commenter Name: Lana Bilbo

Comment: I'm Lana Bilbo. And then just go? Okay. So I support the no-action alternative. The concerns that I have include the fact that this EIS is not going to take into consideration the environmental impacts in the ocean, which seems really crucial. I know that you guys have a separate EIS for that. But kind of artificially breaking these, like this lease is to support the base, which is doing those things. And it seems like a really artificial way of breaking them up so that you don't have to consider it for this part of the process, which I don't think is right. I think that the lease should very much be available to the public to review. I noticed that you guys only said the words fair market value one time in this entire thing, and it's not written on any of the boards. It kind of seems like you're trying to hide the fact that the previous lease was only for a dollar. Doesn't seem cool. I noticed that the way that we're able to provide testimony for this is that we have, like, a room in the corner, and we're being recorded and that we don't have an opportunity to engage as the public with each other, as well as with this process. And I think that that is a very obvious strategic ploy that is also used by developers in this county to sort of minimize and isolate the pushback on projects, and it's pretty obvious. And I'm kind of confused how the cultural impact assessment was initiated in November, but isn't really -- I'm confused how those two things are tied together and especially how no one that I know in the Hawaiian community knows about that or has been consulted. Like, they just found out about this EIS through, honestly, me texting them about it. And so if that process started in November, I'm really confused as to why none of the cultural groups that I work with are aware of that process. And I would say that for now, that's most of my comments. Oh. And I hope that these comments will be made available to the public for review so that we can see what each other are saying, since you've set up this process so that we can't talk to each other. So I hope that the comments will be made available to everybody to look at during this process so that we're not intentionally siloed. Thank you so much.

Scoping Comment Letter 0063

Commenter Name: Wesley Yadao

Comment: Okay. My name is Wesley Yadao. I just want PMRF to open more fishing areas to the public, so that it's all about cultural practices that we need. That's about it. That's about it, just opening more fishing areas to the public. That's all I have for now.

Scoping Comment Letter 0064

Commenter Name: Punohu Kekauala III

Comment: My name is Punohu Kekaulua III, and then just go with my -- this is my comment or testimony. The state lands are crown lands belonging to the chiefs via Great Mahele, which were superior land titles, allodial, that belonged to our ancestors, giving Kanaka an undivided shared interest to the lands. In alternative one, they're asking to lease the lands, release them from the State of Hawaii or DLNR. But they have yet to prove these crown lands belong to them to be able to lease them out. Alternative two, where they're possibly thinking about purchasing the land, the Navy wants to purchase, this should be impossible for Navy to buy state or crown lands because the state can't sell something that does not belong to them. And alternative three, to avoid court cases or community uproar, the Navy should be asking descendants of Victoria Kamamalu, who has a title to the property, to lease it, if they want to do it legally from the true owners of the property. The treaty of annexation has yet to be presented as evidence to prove that Hawaii is the 50th state of America. Without it, the Country and Kingdom of Hawaii are still in existence. Kanaka Maoli, or Hawaiian nationals, have a vested right to their country and its lands through -- through birth. With no treaty of annexation, why is the U.S. Navy here? We are an occupation, so the Navy should change the state to a military government and help with the reconciliation process to give our Kanaka back their rights to self-determination and their private properties. Help hold the fake state and Ag Department accountable for poisoning our precious land and resources. We -- for us Hawaiian nationals, we understand that American citizenship is a voluntary right, not mandatory. So with that being said, administer the law of this land, the kingdom land -- or kingdom law, sorry.

Scoping Comment Letter 0065

Commenter Name: Jose Felix-Keamoai

Comment: My name is Jose Felix-Keamoai. I'm a resident of Kekaha here on the Island of Kauai. I'm also an employee, one of the contractors, for PMRF. Contractor name is Koa Lani JV, LLC. We're also involved in the community of Kekaha in youth sports. Organization is Pop Warner Football and Cheer for Kekaha. Hearing the voice of some of family or friends in the community, knowing that I work at the base at PMRF, they always ask: How do you get access to -- to the beach, which would include fishing -- fishing size, fishing grounds? And I believe there's maybe two options that they have. So the question or request would be, what I'm hearing from the community is: Can they open more fishing access at PMRF? Through an MWR permit would be probably the only way that you can access it. Before 9/11, there was beach access all the way through from Kekaha Beach all the way through to Polihale. There was no barriers. People were allowed to fish, walk all the way through and camp, but now they're not -- but now they're not able to camp or fish. Again, only two options. So again, the question or suggestion is to open up more sites to allow non-PMRF workers to be able to have access to the beach, and of course, including water sports, surfing, and -- and scuba diving. Another concern or -- that I hear from the community is questioning if -- if we would one day become a responsive base. And the only reason for that is once we become a responsive base, pretty much we would be considered a target. And the concern with the people is that we're going to get basically attacked on this side of the island. So is there any plans to not only make PMRF a testing facility, but a response active facility? And if it does become a -- a response facility, what contingencies -- plans are there to safeguard the community? I want to add and -- and actually just give testimony to in the past, personnel at the base have been very helpful when it comes to natural disasters by using or utilizing the -- the flight line and bringing in supplies. So another question would be: Will PMRF continue to allow to open the runway for national emergencies to bring in supplies, as needed? One more question. Knowing that capabilities or technology is advancing and new developments arise every day, what new developments are in the horizon to expand our -- our technological advancements or keep up with our technological advancements? Or any new radars or technology, when they do become available to this site, will there be the same communication to allow people to be acknowledged and have testimony to concerns or questions? And that's all my questions. Thank you very much.

Scoping Comment Letter 0066

Comment Name: Nākaiʻelua Villatora

Comment: ʻO Nātaiʻelua Villatora koʻu inoa. No ka mokupuni o Kauaʻi, ahupuaʻa o Kalapaki, moku o Puna. Noho au ma ka ahupuaʻa o Pōkiʻikauna ma ka moku o Kona. Ke nīnau aku nei wau, pehea aku nei i kēia wahi aupuni o Hawaiʻi, e ai aku i ka hoʻohana ana i kēia mau ʻāina a me ke kumu waiwai ma Kauaʻi nei e pili ana ka military, ka Navy a me NASA. He noi e aʻe, e ano noi haʻahaʻa e hoʻokoaʻe ai a laila. Haʻawi aku ai i nā palapala, hōʻike aku ai i ka palapala i na hoʻoilina nō ka ano ai like ma waena o ka Navy a me NASA me ke aupuni o Hawaiʻi. E hoʻohānai a hoʻohōʻai i ko lākou hoʻohana ana i kā ʻāina. Mahalo nui, mahalo. Okay. So I'm going to switch over to English so you can type. My name is Nākai'elua Villatora, and I am from the island of Kauai from the Ahupua'a of Kalapaki and the Moku of Puna. But I currently reside at the Ahupua'a of Pōkiʻikauna in the Moku of Kona. My testimony would be asking about the original deeds and documents that the Navy and NASA has with the state, and is that provided for a public viewing? Also, would like to -- or would like -- would like to find the -- the documentation of the data of natural resources utilized by the Navy, military, and NASA, for instance, like the punawai spring water resources, any other natural resources, like pertaining to rock formation or any boulders, and then also, like, more in-depth details of what they utilize in the said property. Another thing that I would like to able to express is how much of the -- I -- I understand, like, they are promoting readiness for the military. And what is that readiness? What details is that readiness about? Like, I want to be able to know, like, what type of -- may be -- how I was, like --I'm, like spacing out on what I was going to say? Kalamai. What are -- what are you trying to be ready for, you know, the type of war, etc.? And then. also, what are the benefits of the kaiaulu, or community, here on Kauai? What are the benefits for us, besides this whole protection of ourselves, you know, from -- from unseen forces? And then also -- I was, like, shoot. Where's my paper. Another thing, I just would like to be able to see more -- more information data on paper, where -- for people to provide. Mahalo.

Scoping Comment Letter 0067

Commenter Name: Roslyn Cummings

Comment: Aloha nō, koʻu inoa Roslyn Cummings Manawaiakea, noho au Kalaheo ahupuaʻa, Kona moku, Kauaʻi mokupuni. So I reside in the Kona moku (district), in the Kalaheo Ahupua'a of the Kauai Island in Hawaii. So this is my oral testimony in regards to the Navy and NASA's proposal today. What is the date? May 5th of 2024 oh. Why did I say May? Okay. June 25th (sic) of 2024. Okay. So here's my ʻike ʻoiaʻiʻ, my truth, my knowledge of truth. When water traverses from mauka in our in our forests, and it traverses -- whether underground or above ground, it picks up the nutrients that is needed by everything that surrounds it in its the environment, whether it's the Maoli manu, which is the native birds, or the (indiscernible), the native plants. So when water gets diverted, whether it's mauka or makai, on the shorelines, it affects that Kauai cycle. So one of my greatest concerns with any type of project is to know what the water qualities are, what the water usage is, contaminations. And knowing that the Navy has a history with not good practices here in Hawaii, Kaho'olawe, for instance, Niihau, depletion of water tables. I grew up here on Kauai. My family's actually from here. We were the last family to live in Nu'alolo in Napali. We grew up in Polihale. During the summers, we'd sit -- we'd spend months in the summers there. And so back -- I was born in the '80s. So back in the day, up until the '90s and the early 2000s, we were able to gather punawai, which is spring water. We would drink spring water, which is no longer accessible. So we don't know exactly what's happening with the water. And these are all within that Navy zone -- what -- what is it called? Easement. Within the navy's easement zone. As far as NASA, though, my concerns for NASA is there was a point in time where there was a water quality testing that happened in Miloli'i, M-I-L-O-L-I-I, Miloli'i. This is a secluded area on the Napali coast. That testing got to UH, but it never became public. And within that testing, there was a high levels of contaminant. The component was iron, and it wasn't a natural iron. So my question is: Is there something that's happening up in that area in NASA and the Navy that they're -- they're leasing those lands from the state, is it affecting something below? Is there some kind of natural waterway, there's something seeping from their -- their building? From whatever they're doing up there, is it seeping down into the ground and coming out into that particular area in the reef area that's causing the contaminant to cause a flesh-eating bacteria? Another thing is ancestral burials, iwi kupuna. There's a law -- it's a kingdom law, actually, it's an older law -- and it talks about the law of the sepulcher. And sepulcher, in English terms, is basically graves or burials. And so with this law, it basically protects burials. So whenever we have any kind of disturbances, we have an issue here in Hawaii, where archaeologists come out and have a tendency to remove burials. That's technically desecration in our culture. And regardless of the proper protocols, we need to realize that there's something in our culture called wai wai. Wai wai is a word that you can use for natural resources. Wai wai is a word that you can use for wealth. Wai wai is a word that you can use for imprint. Wai wai is pretty much what bases our sustenance. It's what Kanaka Maoli nā kanaka rely on. And 'aina is everything that we consume. It's part of what we consume. That's 'aina. It doesn't limit to wai or kai. 'Aina is everything that we can consume. So we really need to take into consideration that these practices that we're accustomed to might be more of a haole, foreign, concept versus a Maoli, a native concept, and start to respect these boundaries that our ancestors -- there's this huge gap between what we know now and what our ancestors knew then, and we need to take into that policy and that reverence and respect of what is naturally there. Another thing is that we have to think about the mo'omeheu, which is cultural

practices. Mo'omeheu is a cultural practice that we carry from mauka to makai, so you're talking about mea ho'olako, which are providers. We also have hahai holoholona which are hunters. And the reason why we stay away from the English terminology is because they're all coded in commerce laws, so we utilize our language, by law, it's our right to utilize. And going back to natural, basic human rights, which is written in the Constitution, which the Navy has to abide by any treaties that are being made in any nation -- right -- nation-to-nation tradition treaties within the state, which is where we're in, we're within Hawaii. So going back to these practices, you have the fishermen, you have the lo'i. These are basically what they consider wetlands. There's all these practices within this ecosystem that we call 'aina, and we call it kuleana. And kuleana is respect and responsibility. So we need to take into that acknowledgement that if we had 100 people in one room, each and every one of us would have a kuleana, and they're all going to be different. And we have to come to that concept that we're all equally doing our kuleana. So I want to, you know, acknowledge that. So mahalo for your time, and I hope this helps.

Scoping Comment Letter 0068

Commenter Name: Christopher Ka'iakapu

Comment: My name is Christopher Lono Ka'iakapu of West Kauai, a generational descendant of West Kauai, a Native Hawaiian. And I would like to testify in support of alternative number three, the no-action alternative. And this is because I believe that the U.S. military presence at PMRF, no matter how much the studies try to do, mitigation measures they try to take, they will only continue to cause destruction of the environment or natural resources in our community. The entire nearby PMRF operation only exists because they create an artificial environment by the destruction of the Mana Plains wetlands in Hawaii's -- what was once Hawaii's largest ephemeral wetlands. And so they -- they create this artificial environment for the operation to exist, thereby creating critically endangered species. These wetland birds and these other great endangered species in the Mana Plains ecosystem would not be critically endangered if it were not for the habitat destruction caused by PMRF operations and the sugar cane industry. They maintain a pump system to pump down the water table and divert natural flood plains so that their --their operation can exist. So I find it very ironic that they're claiming to want to protect critically endangered species when their whole operation is the only reason that these species are -- their whole operation is the only reason that these species are critically engaged in the first place. They also make no mention of studying or examining near-shore marine species, such as opihi and limu, which are bottom of the food chain. All the microorganisms are bottom of the food chain resources for our greater fishery. And because the operation is right on the shore, I believe that they should be doing that sort of study. And I -- I don't believe that the Navy will be good stewards. I don't think they have a track record in Hawaii. The entire U.S. military has been a part of the insurrection and overthrow since 1893. And they have bombed Kaho'olawe. They have destroyed Pohakuloa. They have destroyed Makua Valley on Oahu. They have poisoned Red Hill on Oahu. They have destroyed Hawaii's largest, potentially the world's largest, fish pond system of Honolulu to create Pearl Harbor. They have instigated and drawn the Japanese bombing of Pearl Harbor. And they've destroyed the --- the wetlands of Mana. And now they are restricting access not for only Native Hawaiians but all residents on Kauai to what -- what once was some of the most productive fishery on the west side of Kauai. I don't believe that the State of Hawaii has the legal right to even be leasing these lands.

The State of Hawaii is a fraudulent organization that is upheld by the U.S., the United States. And rightfully, these -- the lands that are proposed to be leased to the United States Military and Navy is -- is actually Hawaiian Kingdom ceded lands, crown lands, that is rightfully a part of the Hawaiian Nation. And so for the State of Hawaii to claim authority to lease out these lands is illegitimate and illegal according to international law. Yeah, I -- I oppose -- I oppose them renewing its lease. I -- I oppose the U.S. Military being in Hawaii. If they cared about our environmental and -- and cultural resources, then they would -- they would leave. They would go back home and leave us in peace, a peaceful Hawaiian nation, like we're -- we ought to be. I find it very -- I don't know -- telling and insulting that just about of the representatives here, there's probably as much PMRF staff here as there is community, and they are all not of Hawaii. They're all foreigners. So obviously, their interest is not in the best interests of our 'aina and our people. To me, it's just a symbol of continued colonization, and this is not what I want to support in my community. It's not what I think we should be supporting on a global scale. And this is -- this is just upholding the genocidal war machine of the U.S. Military industrial complex. Yeah. They should not renew the lease, and they should leave

Hawaii in peace and stop pretending like they -- they are really going to study and care about our -- our environment and our biological and cultural resources. Thank you.

Scoping Comment Letter 0069

Commenter Name: Gordon Wilson-Naranjo

Comment: My name is Gordon Willson-Naranjo. I am in support of the Navy lease because I recognize the importance of defense. And I understand that the impacts, while unfortunate, are a necessary evil. I appreciate the stewardship that the Navy has done on Kauai specifically. I believe the REPI Program is an exceptional means of providing DOD money for conservation and partnership. And I think that if the Navy were to leave Kauai, there would be an impact to the economics, as many folks on the west side specifically rely on the base for their income. That's it.

Scoping Comment Letter 0070

Commenter Name: Peleke Flores

Comment: Aloha. My name is Peleke Flores from Waimea. Yeah. Just give you mytestimony or comments for this meeting. Guess my first comment for the meeting is I believe the meeting should be advertised better, like the front page of our local newspaper, versus a little slot in the back. Our local news, social media, state and county websites in the front page, and all our Kauai known -- Kauai-based known NHOs, or Native Hawaiian organizations. I know there's a list out there, but to be able to email everybody about this meeting would help have better due diligence, I guess. There are more -- it seems to me there are more staff members here and partners than community members. And then -- yeah. Doing more better historical research of Mana, Mana's aquaculture would be good, beyond the plantation period and looking at Hawaiian literature that talks about the space and transcribing it. Also, within this process, if we were to go through -- or if the lease is expanded, the -- the area, the agriculture area, should be designated for community use, not big corporations, seed companies, or GMO companies, stuff like -- they should work with NHOs or 'aina-based organizations to restore the place to a semi-functional fish pond, as it once was, and bring back the floating lo'is of Mana. And also, would like to a map or stats data looking at our service, the U.S. service members, how much lives on the base and how much rents outside of the base and how that affects or displaces our local community with higher rent and/or just spaces to live at. I would like to see that stats. And I think for now that's all I got. I'm still going to do more research, and also with -- with all these resources and partners helping pull this EIS together, they should have the resources to reach out better than how they're reaching out now. Also, with the NEPA process and the new addition, the new update to the NEPA process of consulting indigenous knowledge to help guide this Section 106 in the EIS process. Mahalo.

Scoping Comment Letter 0071

Commenter Name: Mike Long

Comment: My name is Mike Long. I live in Kauai for about 12 years. I talked to the commander, and most of the questions I asked, he had no answer for. He doesn't know what the budget was for last year. What kind of commander doesn't know what his budget is? It seems either -- I don't know -- false or not smart. I mean, he's got to know -- he -- he totally blew it off. And I know, like, several years ago, it was, like, $6 billion, and their rent they were paying was $1 a year. So the military gets everything, and Kauai gets nothing. And he says they're going to renegotiate, and it's going to be millions this time. And we don't know who's negotiating for Kauai. In the military industrial complex, they fund politicians, and the politicians are going to be the ones negotiating on our behalf. And I don't feel like we will get a fair shake out of that. And he said it would be -- it would be market value for the next -- next lease. And the market value for that base would be no telling how many billions of dollars. No way they're going to play market value. And one other question I asked is what if we don't renew the lease? Didn't have a good answer for that one, either. And I don't like the fact that they're not wearing their uniforms. They're trying to be friendly. But if you're representing the military, if you're a commander, I'd be wearing my full commander outfit, wouldn't you? So I asked about giving comments, and he said: Oh, you have to do this. And I wanted to ask questions and make them answer my questions in front of everybody, because they didn't answer me. But they've already headed that off with a pass. So this is not a really good informative meeting. It's a presentation with a lot of nebulous terms that nobody's going to understand. And not knowing their budget for last year seems like a pretty big red flag to me. I hope our representatives do better than I think they're going to do, but I don't know. And according to the environmental study, everything they do harms the environment here. I mean, they're a military organization. They drop bombs in the water. They use sonar that affects the whales. And they say -- oh, they try to mitigate that. If there's whales around, they don't use the sonars, whatever. You know that's not true. They do what they're going to do no matter what. And we didn't even get to the part about all their tests are scripted. They spend billions of dollars a year, and they couldn't shoot down an enemy rocket if our lives depend on it, and they do. They -- all the tests are rigged so it looks like they're doing something good, and they're spending billions of dollars to do it. It just seems like a tremendous waste of money to me, and it has negative impact on Hawai'i. I don't think we should renew their lease at all, and I think they would have a big panic attack if we threatened to do that. So that's my comments. I hope it helps the people of Hawai'i. Thank you for your time. So how'd I do?

Scoping Comment Letter 0072

Commenter Name: Darlyne Mcleod

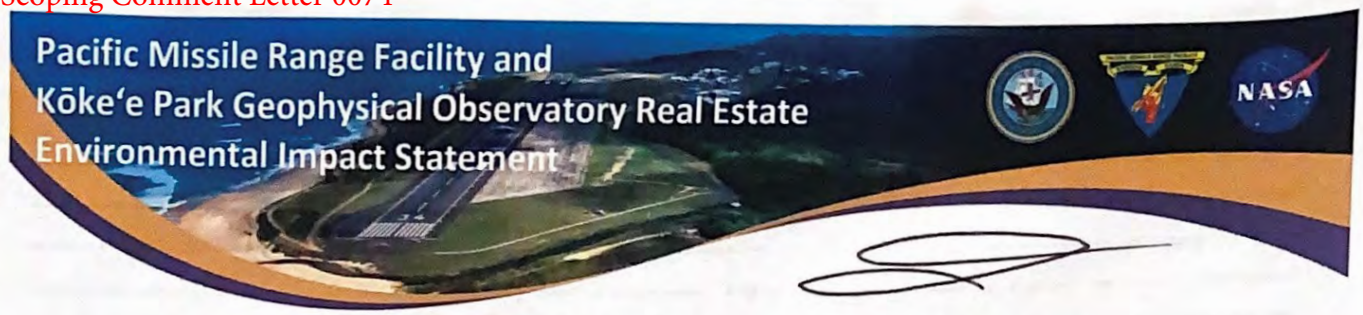
Comment: So my name is Darlyne McLeod, and I was thinking that a wonderful idea would be should we go with the alternative where the base/PMRF and NASA buy the land outright for fair market value, that some percentage of that money that would be made from that sale be applied towards affordable housing for the Island of Kauai, so that basically some of that money would be able to go back into the community and there'd be a direct benefit to this sale.

Scoping Comment Letter 0073

Commenter Name: Sherri Cummings

Comment: My name is Sherri Cummings and I am a DHHL waitlister, Department of Hawaiian Home Land Trust 1920 Rehabilitation Act federal program. My concerns that I have is the ability to actually be part of the stakeholders who would have some type of benefit returned to them. Majority of our agriculture lands is on the west side of the Island of Kauai, and they are part of the lands that I believe could have some benefits regarding water transmission lines and nopportunities for us to be placed on lands that is being held in trust for us. And I think we should have beneficiary consultation to support the efforts of the Department of Hawaiian Home Land placing us on ag awards. The last ag award was in the year 1985. their leases and were promised tohave re-awarded leases, and that never happened. Four families died without being placed on the list. And there's only one family today that has what we would consider insufficient water source for what he does on DHHL's lands. So that is my primary concern. And the reason why we don't have these ag awards words is basically the lands are -- were deemed lands that could not be farmable or have pastoral opportunities, because of lack of water. There were five families that were awarded in the early 1960s, and four families gave back and that never happened. Four families died without being placed on the list. And there's only one family today that has what we would consider insufficient water source for what he does on DHHL's lands. So that is my primary concern. I have other concerns regarding, you know, Niihau ohana having opportunities to have infrastructure to support themselves regarding water and electricity. And the Hawaiian families that was relocated from Niihau to Kauai, and they have the opportunities, as well, to have some sort of repatriation, for lack of better word, regarding how they were removed from their lands, my family's included. My mother's great-grandmother left the island, the first wave of native Niihau people. Her name was Kahinawe Keo, and she came with her mother, Ho'a'a, and her father Wahinealoha Keo. And so just trying to see if there's opportunities where Niihau people can benefit from what is happening on the -- the west end. And I think, you know, in all honesty, the DHHL beneficiaries should be at the priority, because we are actually still held by the federal government in a program that was -- that was passed congressionally in the year 1920 by our Prince Jonah Kuhio Kalanianaole. And as a condition of statehood, that rehabilitation act came with being a condition as a federal compact. So I -- I feel that for all intents and purposes, DHHL beneficiaries should be at the table in all decision making moving forward. Thank you.

Scoping Comment Letter 0074



Public Scoping Meeting Comment Form

Date: June 4, 2024

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- In person at a public scoping meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by June 17, 2024 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

1- We definiTely need To ensure a strong presence here on This WesTernmosT ouTposT of The USA To deTer poTenTial armed incursions here wiTh Their objecT of aTTacKing The VSAT.

2. Consider The Local importance of our major garbage dump (MounT Trashmore, as some of us call iT) — iT is will soon reach iTs mandated uTmosT height of 27 ft (I believe by 2030 or so) and This is a major consideration for Navy & NASA when planning future expansions.

3) Thank you, mahalo, for This opporTuniTy To enacT wiTh our residenTs

Please provide your mailing address to receive future notifications about the project.

1. Name: Alice C. Parker
2. Organization/Affiliation (if applicable): _____
3. Mailing Address: 3120 Jerves ST, D-2, Lihue, HI 96766-1184

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Naval Facilities Engineering Systems Command, Hawai'i, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

Scoping Comment Letter 0075

Public Scoping Meeting Comment Form

Date: 6/3/24

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- By mail, postmarked by June 17, 2024 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

KAUAI DESPARATELY NEEDS A NEW LOCATION FOR A LANDFILL. APARENTLY NO LOCATION CAN BE FOUND. DO YOU NEED ALL THE EASMENT LAND OR COULD YOU CONSIDER PART OF THAT LAND BE SET ASIDE FOR A NEW LANDFILL? THIS IS A PROJECT WITH GREAT BENEFITS FOR PMRF AS WELL AS THE CIVILIAN POPULATION OF THE ISLAND. THANK YOU FOR CONSIDERING THE IDEA

Please provide your mailing address to receive future notifications about the project.

1. Name: SANDY PHILLIPS
2. Organization/Affiliation (if applicable): RETIRED
3. Mailing Address: 3120 JERVES ST. APT B-1 LIHUE, KAUAI 96766

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Scoping Comment Letter 0076

Pacific Missile Range Facility and
Kōke'e Park Geophysical Observatory Real Estate
Environmental Impact Statement

Public Scoping Meeting Comment Form

Date: 6/5/24

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** Please Print Clearly ** Additional Space is Provided on Back **

I support option #3. Not renew military contract. There does not appear to be enough evidence to support the impact the military is having on our ocean! I do not mind the military on the land if just that the land is the bases for the onset of horrific devestation to our ocean with war games and military ocean practices.
I do not like NASA land negotion intertwined with the Navy. I support Nasa to maintain their contract

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2. Organization/Affiliation (if applicable): _____
3. Mailing Address: _____

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Scoping Comment Letter 0077

Public Scoping Meeting Comment Form

Date: 6/5/2024

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- By mail, postmarked by June 17, 2024 (see address below)

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Amazing new developments! I wanted to show my support and learn more.

Please provide your mailing address to receive future notifications about the project.

1. Name: Malcolm Pryor
2. Organization/Affiliation (if applicable): Resident Kekaha, HI
3. Mailing Address: 8264 Elepaio Rd B Kekaha, HI 96752

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Pearl Harbor, HI 96860

Scoping Comment Letter 0078

Public Scoping Meeting Comment Form

Date: 6/9/24

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- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by June 17, 2024 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

KOKE'E NASA LAND USE AREA HAS ~~KAUAI~~ COUNTY LABELED ~~VEHICLES~~ VEHICLES THAT APPEAR ABANDONED. WILL THOSE ITEMS BE REMOVED PRIOR TO LEASE RE-NEWAL

Please provide your mailing address to receive future notifications about the project.

1. Name: MATT SNEED
2. Organization/Affiliation (if applicable): PMRF
3. Mailing Address: ACADEMYBOY@HOTMAIL.COM

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Pearl Harbor, HI 96860

Scoping Comment Letter 0079

Public Scoping Meeting Comment Form

Date: 6-5-24

Please submit comments for the scoping process by June 17, 2024. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

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- By mail, postmarked by June 17, 2024 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

- Provide Original Deed or Agreement (Document with the State to "obtain" lease.
- Under what laws does NASA & NAVY operate under?
- Concern for another 65 year lease of mismanagement and utilization of natural resources 'āina, wai / punawai, pōhaku etc.
- What benefits to the kaiāulu does these renewal of the leases provide?
- Does the military recognize ke kanawai o Kō Pae Āina Hawai'i?

Please provide your mailing address to receive future notifications about the project.

1. Name: Nākai 'elua Villatora hobilina
2. Organization/Affiliation (if applicable): E Ola Kākou Hawai'i
3. Mailing Address: 3-2600 Kaumualii Hwy STE 1300 #527

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Scoping Comment Letter 0080

Pacific Missile Range Facility and
Kōke'e Park Geophysical Observatory Real Estate
Environmental Impact Statement

Public Scoping Meeting Comment Form

Date: 5 June 2024

Please submit comments for the scoping process by June 17, 2024. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

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FYI -
Many Peoples in Kekaha have No Vehicles and we would like to have, re-cycle Bins that we could walk to - - in areas that would Not bother Residents - - yes - we/I have e mailed Mel RAPOZA

Please provide your mailing address to receive future notifications about the project.

1. Name: Mary A. Hawkes
2. Organization/Affiliation (if applicable): _____
3. Mailing Address: P.O. Box 1095 Kekaha HI 96752

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Scoping Comment Letter 0081

Public Scoping Meeting Comment Form

Date: 6/06/24

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- In person at a public scoping meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by June 17, 2024 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

Growing up on Kauai we had many opportunities to enjoy the beach with free access. (behind pmrf ngoras etc), now its restricted (because bin-laden). I understand PMRF gives access with a screening process but whats the point. Nothing has ever happened to the base were not at war why can't the locals enjoy the beach free and clear. I grew up driving on the beach with my family fishing, surfing, enjoying the beach that YOU Dont Own. By limiting our access you are restricting limiting our access to our cultural resources and taking away from our Keiki that should be able to enjoy and learn from their Kupuna Please open up free access remove the poles on the sand If WE CAN't own the beach YOU Can't Either.

Please provide your mailing address to receive future notifications about the project.

1. Name: Kainoa Nakazawa
2. Organization/Affiliation (if applicable): Surfer / Fisherman
3. Mailing Address:

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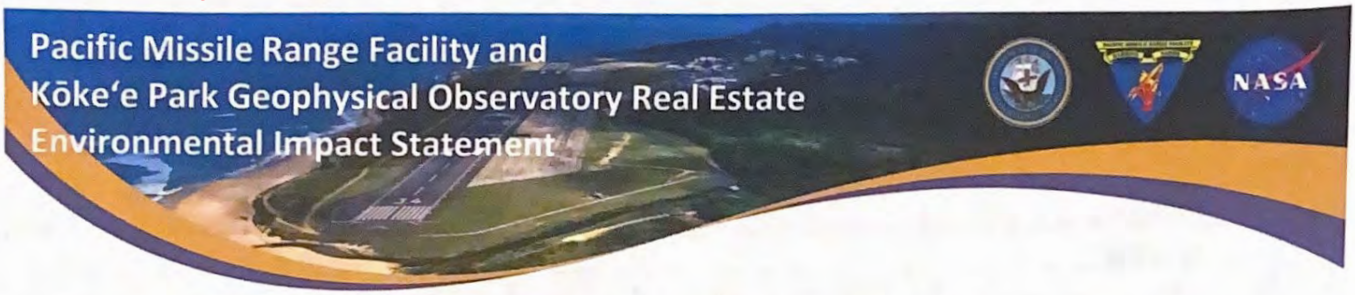
Naval Facilities Engineering Systems Command, Hawai'i, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860



Public Scoping Meeting Comment Form

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1. This land is ~~not~~ being used to support the activities of the base, which is training ~~ARA~~ with Rockets, missles and bombs. The impacts of the supported activities should be part of this EIS.
2. The EIS should consider a 4th alternative: the restoration of the ~~lands~~ Mana plains to wetlands + cultural practice areas. The base is what prevents this. There used to be a huge loko i'a.
3. Advertising for this event was inadequate. There were more NAVY staff than community members at all 3 events.
4. The federally recognized Native Hawaiian Organizations (NHOs) need to be consulted as part of the section 106. This should be discussed openly at meetings
5. Traditional gathering rights need to be respected without needing to show "state" ID or being granted a permit or being in the first two. It was not

Please provide your mailing address to receive future notifications about the project.

1. Name: LANA BILBO
2. Organization/Affiliation (if applicable): _____
3. Mailing Address: 5876 AHAKEA ST., 96746

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Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells
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Pearl Harbor, HI 96860

** Please Print Clearly **

followed around on base.

6. The leases should be in your info packet for community reviews.
7. Displacement of people born in Hawai'i should be considered,
8. The unfair $1 lease should be backpaid, in addition to market value moving forward.
9. ~~Taro~~ ~~should be~~ any agriculture + work + conservation done on the Mānā plain should restore the wai, the native wetland ecosystem, and be done via NHOs, to rectify the ongoing environment injustice the base perpetuates.
10. The public should have the opportunity + space to talk as a hui at these meetings so we can hear eachothers concerns.
11. The psychological impact of the bases presence should be considered + studied. ~~It~~ It is a physical reminder of the illegal occupation of the Hawaiian Islands. It is also being used to train genocidal militaries, including the Israeli Defense Forces. This has a disproportionate impact on the psychology of Hawaiian kanaka 'oiwi and Hawaiian Nationals.
12. If the agriculture on the māñā plain is using pesticides + heavy chemicals with studied or suspected health impacts, that has a disproportionate impact on Kekaha + the west side, which ~~is mostly~~ has a high concentration of minorities in the community. The activities on these easements should not harm our community via the above.
13. The cultural practices that we can't do because of the ongoing water diversion to the wetland need to be considered. This includes, not limited to, paddling canoes, in the wetland, working lo'i + harvesting from it, sustaining + being sustained by the loko i'a, the impacts of removing that habitat for the native birds, nuts, oil, prayer, etc. etc.
14. A clear explanation of the facilities on Ni'ihau + their relationship to this project should be provided, ~~if they are not part of this renewal process~~
15. Should have independant 3rd party testing of all sites that have poison, toxic, polluting or contaminating materials or actions that are disclosed directly to the public w/o the NAVY as intermediary.

YOUR INPUT MATTERS
Visit PMRF-KPGO-EIS.com

Scan QR code for project website

Scoping Comment Letter 0083

Public Scoping Meeting Comment Form

Date: 6/5/24

Please submit comments for the scoping process by June 17, 2024. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

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1. Please address the needs of DHHL Beneficiaries and have Consultation w/ those associations of the Department of Hawaiian Homelands as well as the Waitlist Association and NHO's that support the beneficiaries of the federal mandated Program 1920 Hawaiian Homes Commission Act.
2. Speak to Native Hawaiian Hawaii beneficiaries and have beneficiary Consultation w/ them as well.

Please provide your mailing address to receive future notifications about the project.

1. Name: Sherri Cummings
2. Organization/Affiliation (if applicable): Mālama Anahola, Kīkoʻo Kuaʻa
3. Mailing Address: 2878 Pikake St. Lihue, Kauai, Hawaii, 96766

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Pearl Harbor, HI 96860

Scoping Comment Letter 0084

Public Scoping Meeting Comment Form

Date: _____

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Bird interaction or distraction @ koke.

Please provide your mailing address to receive future notifications about the project.

1. Name: Karen Ono
2. Organization/Affiliation (if applicable): BLNR
3. Mailing Address: karenono@gmail.com (808) 482-1700

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400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

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Navy and NASA Letters in Response to Agency Scoping Comments

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DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

August 30, 2024

Dear State of Hawai‘i Department of Land and Natural Resources, Division of Aquatic Resources:

SUBJECT: Public Scoping Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Environmental Impact Statement

The United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) appreciate the comments and feedback received from the public, state, and federal agencies as part of the public scoping process for the Navy Pacific Missile Range Facility (PMRF) and NASA Kōke‘e Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS). As discussed at the public scoping meetings, the Navy and NASA are developing an EIS to evaluate the potential environmental consequences of their proposal to retain State lands presently utilized pursuant to leases and easements on Kaua‘i. The Navy proposes to retain use of 8,348 acres for operational continuity and sustainment at PMRF. NASA proposes to retain use of 23 acres for continued operations, including measurements of the Earth’s rotation and local land motion, at KPGO.

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Thank you for your interest in the project.

Sincerely,

Kerry Kylene Ling (*formerly Wells – recent name change*)
NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai‘i

Sincerely,

Shari Miller
NEPA Project Manager
NASA Goddard Space Flight Center

Distribution:
State of Hawai‘i Department of Health, Clean Water Branch
State of Hawai‘i Office of Planning and Sustainable Development
State of Hawai‘i Office of Hawaiian Affairs
State of Hawai‘i Department of Land and Natural Resources, Land Division
State of Hawai‘i Department of Land and Natural Resources, Division of Aquatic Resources
United States Environmental Protection Agency, Region 9

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

August 30, 2024

Dear State of Hawai‘i Department of Land and Natural Resources, Land Division:

SUBJECT: Public Scoping Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Environmental Impact Statement

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State of Hawai‘i Office of Planning and Sustainable Development
State of Hawai‘i Office of Hawaiian Affairs
State of Hawai‘i Department of Land and Natural Resources, Land Division
State of Hawai‘i Department of Land and Natural Resources, Division of Aquatic Resources
United States Environmental Protection Agency, Region 9

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

August 30, 2024

Dear Reef Migita - State of Hawai‘i Department of Health, Clean Water Branch:

SUBJECT: Public Scoping Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Environmental Impact Statement

The United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) appreciate the comments and feedback received from the public, state, and federal agencies as part of the public scoping process for the Navy Pacific Missile Range Facility (PMRF) and NASA Kōke‘e Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS). As discussed at the public scoping meetings, the Navy and NASA are developing an EIS to evaluate the potential environmental consequences of their proposal to retain State lands presently utilized pursuant to leases and easements on Kaua‘i. The Navy proposes to retain use of 8,348 acres for operational continuity and sustainment at PMRF. NASA proposes to retain use of 23 acres for continued operations, including measurements of the Earth’s rotation and local land motion, at KPGO.

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Shari Miller
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State of Hawai‘i Office of Hawaiian Affairs
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United States Environmental Protection Agency, Region 9

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

August 30, 2024

Dear United States Environmental Protection Agency, Region 9:

SUBJECT: Public Scoping Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōkeʻe Park Geophysical Observatory Real Estate Environmental Impact Statement

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Shari Miller
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State of Hawai‘i Office of Planning and Sustainable Development
State of Hawai‘i Office of Hawaiian Affairs
State of Hawai‘i Department of Land and Natural Resources, Land Division
State of Hawai‘i Department of Land and Natural Resources, Division of Aquatic Resources
United States Environmental Protection Agency, Region 9

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

August 30, 2024

Dear State of Hawai‘i Office of Hawaiian Affairs:

SUBJECT: Public Scoping Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Environmental Impact Statement

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Naval Facilities Engineering Systems Command, Hawai‘i

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DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

August 30, 2024

Dear State of Hawai‘i Office of Planning and Sustainable Development:

SUBJECT: Public Scoping Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Environmental Impact Statement (DTS 202405131013NA)

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NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai‘i

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Shari Miller
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Public Comments on Draft EIS and Responses

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Public Comments on Draft EIS and Responses

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
Federal			
Environmental Protection Agency, Region 9	Zac Appleton	57	68
State			
Department of Education	Cori China	41	39
Department of Health, Clean Air Branch	Lisa Kitahara	4	4
Department of Health, Clean Water Branch	Mike Kaneshiro	5	6
Department of Land and Natural Resources	Luke Sarvis	109	138
Department of Land and Natural Resources, Land Division	Luke Sarvis	109	140
Department of Land and Natural Resources, CWRM	Luke Sarvis	109	149
Department of Land and Natural Resources, DAR	Luke Sarvis	109	151
Department of Land and Natural Resources, DOFAW	Luke Sarvis	109	152
Department of Land and Natural Resources, OCCL	Luke Sarvis	109	163
Department of Land and Natural Resources, SHPD	Luke Sarvis	109	168
Department of Land and Natural Resources, State Parks	Luke Sarvis	109	169
House of Representatives	Daynette (Dee) Morikawa	25	28

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
Office of Hawaiian Affairs	Kamakana C. Ferriera	111	170
Office of Hawaiian Affairs	Kamakana C. Ferriera	122	211
State Parks	Carl Sholin	46	43
County			
County of Kauaʻi, Department of Public Works	Allison Togloka	108	137
Councilmember, Kauai County Council	Felicia Cowden	112	176
Other			
Bucks Environmental Action	Sharon Furlong	73	79
Democratic Party of Hawaiʻi	Melodie Aduja	117	191
E Ola Kākou Hawaiʻi	Roslyn Cummings	2	2
Ka Lāhui Hawai'i	Jennifer Kaui Young	40	36
Kauai for Palestine, Jewish Voice for Peace Hawaii	Lana Bilbo	16	17
Kauai News Now	Emma Schneck	9	12
Kekaha Pop Warner Organization	José Felix-Keamoai	20	25
Kumano I Ke Ala	Davis Price	119	201
ʻOhana Keanaʻaina, Keliʻikoa, Kaiʻaokamalie & Bator		47	43
PAL Hawaii	Larry Graff	8	12
Veterans for Peace	John Wilks	101	127

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
Wailua Homesteads Resident	Valerie Weiss	11	12
Wainiha Country Market Inc	Joell Edwards	81	83
Individuals			
n/a	Kelsey Amos	121	210
n/a	Georgia Anders	78	81
n/a	Anonymous	19	23
n/a	Ke'anolani Aquino	171	268
n/a	Enrico Atienza	126	227
n/a	Laurie Atienza	124	226
n/a	Anna Barbeau	42	39
n/a	Kimmer "Nahonu" Horsen Bighorse	98	118
n/a	Kimmer "Nahonu" Horsen Bighorse	99	121
n/a	Gisele Bisch	86	106
n/a	Stephenie Blakemore	27	29
n/a	Stephenie Blakemore	31	32
n/a	Stephenie Blakemore	129	229
n/a	Sarah Braunsdorf	151	253
n/a	Tami Carpenter	1	1
n/a	Kaimana Castanada	36	34
n/a	Kaimana Castanada	150	252

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
n/a	Cesarkeerm CesarkeermBT	91	109
n/a	Mahealani Chandler	154	255
n/a	Mervin Chun	157	257
n/a	Mervin Chung	37	35
n/a	Thomas Clements	38	35
n/a	Daniel Cole	85	106
n/a	Rosalyn Cummings	100	124
n/a	Roslyn Cummings	149	251
n/a	Sherri Cummings	115	189
n/a	Sherri Cummings	155	256
n/a	Sherri Cummings	165	263
n/a	Michael Daly	176	272
n/a	Dianne Deauna	166	264
n/a	Alvin Deer	69	76
n/a	Paul Dozier	94	109
n/a	Dennis Eguchi	34	34
n/a	Therese Eke	59	69
n/a	Clarence Estes	30	32
n/a	Jose Felix	153	254
n/a	José Felix-Keamoai	21	25
n/a	Virginia Feldman	60	70
n/a	Felicidy Fidez Phimmasone	97	112

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
n/a	Kawailani Fifita	125	227
n/a	Nathaniel Fisher	49	51
n/a	Cindy Freitas	22	25
n/a	Cindy Freitas	24	27
n/a	Cindy Freitas	134	233
n/a	Richard Gioscia	14	15
n/a	Richard Gioscia	32	33
n/a	Patti Gmeiner	68	76
n/a	Beth Goodson	72	78
n/a	Kip Goodwin	56	68
n/a	Sharon Goodwin	116	190
n/a	D. Green, C. Burghardt	43	40
n/a	Regina Gregory	75	80
n/a	Mai Hall	29	31
n/a	Greg Halzman	33	33
n/a	Riyaana Hartley	66	75
n/a	Frank O. Hay	13	15
n/a	Cheryl Hendrickson	96	111
n/a	Kiele and Pualoke Hirata	162	261
n/a	Fern Holland	84	88
n/a	Gabrielle Holt	71	77
n/a	Ronnie Inagaki	55	64
n/a	Doris Jaynes	26	29

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
n/a	Lauren Johnson	70	76
n/a	Michael Jones	7	11
n/a	Michael Jones	10	12
n/a	Michael Jones	48	44
n/a	Chris Ka'iakapu	148	249
n/a	Hope Kallai	113	178
n/a	Hope Kallai	123	216
n/a	Alana Kamaile	93	109
n/a	Malaki Kauiokapono Kanahue	136	236
n/a	Kaimana Kinzie	17	20
n/a	Kaimana Kinzie	18	22
n/a	Kaimana Kinzie	139	240
n/a	Kaimana Kinzie	143	244
n/a	Kaimana Kinzie	175	272
n/a	Lori Kizer	92	109
n/a	Emma Koa	170	267
n/a	Klayton Kubo	44	43
n/a	Klayton Kubo	164	262
n/a	Manuel Kuloloio	135	235
n/a	Manuel Kuloloio	145	245
n/a	Manuel Kuloloio	174	271
n/a	Keahi Kuroiwa	160	259

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
n/a	Jessica Kuzmier	114	188
n/a	Mary Lu Kelley	53	58
n/a	Michelle Ma	127	227
n/a	Aya Mack	128	227
n/a	Lauren Mangini	89	108
n/a	Tia Marie	107	133
n/a	Tia Marie	118	197
n/a	Tia Marie Namahana Masaniai-Estrera	130	230
n/a	Tia Marie Masaniai-Estrera	168	265
n/a	Alfred Keaka Hiona Medeiros	138	239
n/a	M MH	120	210
n/a	Leah Miller	82	86
n/a	Julie Morcate	79	81
n/a	Paulette Morrissey	106	132
n/a	Darlene Muraoka	52	57
n/a	Shyanne Olores	50	51
n/a	Shyanne Olores	54	60
n/a	Shyanne Olores	95	109
n/a	Shyanne Olores	105	130
n/a	Shyanne Olores	137	237
n/a	Shyanne Olores	146	246

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
n/a	Shyanne Olores	173	270
n/a	Shyanne Olores	177	272
n/a	Steven Pereira	83	87
n/a	Kahakuhailoa Poepoe	80	82
n/a	Leonani Puaa	88	107
n/a	Joshua Reichek	67	76
n/a	Tara Rojas	133	232
n/a	Tara Rojas	140	241
n/a	Tara Rojas	142	243
n/a	Tara Rojas	147	248
n/a	Tara Rojas	167	264
n/a	Rupert Rowe	159	259
n/a	Erin Rutherford	103	129
n/a	Jose San Agustin Jr	35	34
n/a	Alexx Sanchez	90	108
n/a	Kauwila Sheldon	23	26
n/a	Sequoya	110	170
n/a	Anne Shiparski	87	107
n/a	Shannon Sitzler	76	81
n/a	Healani Sonoda-Pale	132	231
n/a	Healani Sonoda-Pale	141	242
n/a	Healani Sonoda-Pale	144	244
n/a	Healani Sonoda-Pale	158	258

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
n/a	Kaleiheana-Pōhaku Stormcrow	61	71
n/a	Kaleiheana-Pōhaku Stormcrow	62	73
n/a	Steven Sullivan	152	254
n/a	Melissa Tomlinson	172	269
n/a	Brandon Trelstad	74	80
n/a	Edward Tripp	64	74
n/a	James Trujillo	163	262
n/a	Russell Tsuji	6	11
n/a	Russell Tsuji	39	35
n/a	Russell Tsuji	45	43
n/a	Elizabeth Ullman	58	69
n/a	Joshua Uyehara	161	260
n/a	Nākaiʻelua Villatora	104	129
n/a	Nākaiʻelua Villatora	131	230
n/a	Bruce Wade	65	75
n/a	Maria Walker	15	15
n/a	Valerie Weiss	3	4
n/a	Denver West	77	81
n/a	Sarah Westwind	63	74
n/a	Scott Whitmarsh	102	129
n/a	Kanealiʻi Williams	156	257
n/a	Kanealiʻi Williams	169	267

Draft EIS Commenter's Organization (if applicable)	Draft EIS Commenter Name	Draft EIS Letter ID	See Table I-2 page:
n/a	Terrill James Kane Alii Williams	28	29
n/a	Don Wilson, USN, Retired	51	53
n/a	Shaun Wolfe	12	13

Table I-2 Public Comments on the Draft EIS and Comment Responses

Letter ID	*Commenter Name*	*Organization/ Affiliation*	*Comment Number*	*Original Public Comment on Draft EIS*[1]	*Response from Navy and NASA*	*Resource/Section*
0001	Tami Carpenter	Veteran, U.S. Navy (Ret.)	1	To Whom It May Concern, Please accept the following public comment regarding the Draft Environmental Impact Statement (EIS) concerning the continued use of state lands on Kaua'i by the U.S. Navy and NASA. I respectfully request that my statement be entered into the public record. As a U.S. citizen and former resident of Hawai'i, I am submitting this comment in response to the Draft Environmental Impact Statement (EIS) regarding the continued use of state lands on Kaua'i by the U.S. Public Comment on Draft EIS – PMRF and KPGO Use of State Lands. Navy and NASA.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Please see responses to your specific comments below.	EIS Process
0001	Tami Carpenter	Veteran, U.S. Navy (Ret.)	2	The land and people of Hawai'i are sacred and intertwined. Any evaluation of environmental impact must recognize that in Hawai'i, cultural and ecological well-being are not separate concerns; they are inextricably linked. Continued federal use of these lands without the full, informed, and enthusiastic consent of Native Hawaiian communities risks violating both the spirit and the letter of environmental justice frameworks, including those outlined in Executive Order 12898 and the National Environmental Policy Act (NEPA). The EIS acknowledges potential effects on cultural practices and sacred sites, but fails to demonstrate how federal agencies will uphold the rights of Native Hawaiian people to protect and steward their ancestral land, particularly given the long history of land dispossession and cultural erasure following the illegal annexation of the Hawaiian Kingdom.	Section 3.3.1.2 (Cultural Practices/Regulatory Setting) of the Final EIS discusses federal and State laws and regulations addressing Native Hawaiian traditional cultural practices and associated resources. Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes coordination of access to PMRF and KPGO for cultural practices. Enhanced Engagement-2 (see Table 5.2-1) described in the Final EIS streamlines access to traditional Hawaiian cultural practitioners to PMRF through development of a PMRF Access Management Plan that balances public access and PMRF's mission requirements. Executive Orders 12898 and 14096 (which included a whole-of-government approach to Environmental Justice) were revoked on January 21, 2025; however, see Cultural Practices (Section 3.3), Socioeconomics (Section 3.6), and Land Use and Access (Section 3.5) for relevant analyses in the Final EIS.	Cultural Practices
0001	Tami Carpenter	Veteran, U.S. Navy (Ret.)	3	I urge decision-makers to adopt the "No Action" alternative unless and until Native Hawaiian cultural practitioners, elders, and community leaders indicate their explicit support. To proceed without such consent would constitute a continuation of historical harm and would deeply undermine the stated goals of public engagement, cultural preservation, and environmental responsibility.	As described in Section 3.3 (Cultural Practices) of the Final EIS and the Cultural Impact Statement (in Appendix F) of the Final EIS, the EIS consulted with local Native Hawaiian cultural practitioners, kūpuna, community leaders, and the Office of Hawaiian Affairs while preparing the EIS and the Cultural Impact Assessment (CIA). This occurred at public meetings and meetings with the Kaua'i and State Aha Moku Council. As the decision-makers for the HEPA (Hawai'i Revised Statutes Chapter 343) process, Board of Land and Natural Resources (BLNR) will utilize the information in the Final EIS including cultural consultations to determine whether or not to accept the Final EIS based on "whether the final EIS, in its completed form, represents an informational instrument that fulfills the intent and provisions of Chapter 343, HRS, and adequately discloses and describes all identifiable environmental impacts and satisfactorily responds to review comments" (Hawaii Administrative Rules [HAR] section 11-200.1-28). The Navy and NASA, as the decision makers for the National Environmental Policy Act (NEPA) process, will utilize the information in the Final EIS including cultural consultations to prepare a Record of Decision that identifies the selected alternative and identify and discuss all such factors, including any essential considerations of national policy, that the agency balanced in making its decision and state how those considerations entered into its decision.	Action Alternatives
0001	Tami Carpenter	Veteran, U.S. Navy (Ret.)	4	As a military veteran, I served this country with the belief that integrity, freedom, and respect for sovereignty were core American values. That belief must extend to how we treat Indigenous communities and the lands they hold sacred. The people of Hawai'i deserve more than symbolic consultation; they deserve to lead the conversation about their own future. Thank you for the opportunity to provide input on this important matter.	The Navy and NASA respect and honor your service. Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) of the Final EIS summarizes the cultural consultation that was conducted with Native Hawaiians about the Proposed Action, and the CIA found in Appendix F provides more details about those consultations. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS describes the Navy's	Cultural Practices

[1] Please note that Original Public Comments on the Draft EIS have been left verbatim as submitted. Any typographical errors, misspellings, or incorrect diacriticals have not been corrected from the original comments.

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Sincerely, Tamara Carpenter [Virginia Beach, VA] Veteran, U.S. Navy (Ret.)	coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Enhanced Engagement-4, PMRF Kauaʻi (https://pmrfkauai.com/), will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions. Your preference for the withdrawal of the Navy and NASA's proposal is noted.	
0002	Roslyn Cummings	President, E Ola Kākou Hawaiʻi Trustee, Malama:Cummings ʻOhana God Trust©	1	AFFIDAVIT OF OPPOSITION, PUBLIC ACCESS DEMAND & CONSTRUCTIVE TRUST DECLARATION In the Matter of Environmental Projects Published in The Environmental Notice – June 23, 2025 Affiant: Roslyn Nicole Manawaiakea Mālama mare Cummings In Propria Persona | Hoʻoilina | Native Tenant | Trustee of Malama:Cummings ʻOhana God Trust© On behalf of: E Ola Kākou Hawaiʻi Filed as: Court of Record | File on Demand	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Please see responses to your specific comments below.	Action Alternatives
0002	Roslyn Cummings	President, E Ola Kākou Hawaiʻi Trustee, Malama:Cummings ʻOhana God Trust©	2	I. FOUNDATIONAL JURISDICTION: HAWAIIAN KINGDOM LAW & EQUITY STANDING I affirm standing under the laws, customs, and constitutional framework of the Hawaiian Kingdom, including: • 1839 Declaration of Rights of People and Chiefs • 1840 & 1852 Hawaiian Kingdom Constitutions • 1846 Civil Code of the Hawaiian Kingdom • 1850 Kuleana Act • Treaty of Friendship, Commerce, and Navigation (U.S.–Hawaiʻi, 1849) “Government is a sacred trust for the benefit of the people… The lands belong to the people, not the government.” — 1840 Constitution, Kingdom of Hawaiʻi These instruments remain unrepealed and enforceable under international law, reaffirmed by: • Larsen v. Hawaiian Kingdom, PCA Case No. 1999-01 • U.S. v. Lorenzo, 995 F.2d 1448 (9th Cir. 1993) (acknowledging legal arguments over the Hawaiian Kingdom’s continuity)	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Cultural Practices
0002	Roslyn Cummings	President, E Ola Kākou Hawaiʻi Trustee, Malama:Cummings ʻOhana God Trust©	3	II. RECORD OF EXCLUSIVE EQUITY JURISDICTION The following filings constitute lawful notice, perfected standing, and equitable jurisdiction for all claims made herein: • Bureau of Conveyances: o Doc. No. A-9210000469 (Constructive Trust Declaration) o Doc. No. A-9210000470 (Jurisdictional Challenge) • ⚖ Hawaiʻi Supreme Court: SCOT-25-0000197 • ⚖ Fifth Circuit Court: 5CCV-25-0000033 • ⚖ Land Court: 1CLD-24-0003640 These records operate as lawful rebuttals to any presumption of U.S. or State authority over Hawaiian lands or ancestry-based claims.	The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0002	Roslyn Cummings	President, E Ola Kākou Hawai'i Trustee, Malama:Cummings 'Ohana God Trust©	4	III. LEGAL FRAMEWORK & DUTIES All agencies and license holders are bound by: A. Rule of Law "No one is above the law." — Marbury v. Madison, 5 U.S. 137 (1803) B. Clearfield Doctrine Clearfield Trust Co. v. United States, 318 U.S. 363 (1943): When governments act as corporations, they are subject to commercial liability and must prove jurisdiction. C. Doctrine of Discovery – Rebutted Johnson v. M'Intosh, 21 U.S. 543 (1823), is no longer applicable under: • UNDRIP Articles 26–28 • Inter-American Commission Report 75/15 (2015) • Permanent Court of Arbitration (Larsen v. Hawaiian Kingdom) D. Trust and Fiduciary Law All public lands are held in trust, requiring: • Duty of loyalty and impartiality (Bogert's Trusts & Trustees, §543) • Transparent disclosures to beneficiaries • Consent of lineal heirs and native tenants for all development activity	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the Project Area is described in Land Use and Access (Section 3.5) of the Final EIS.	Cultural Practices
0002	Roslyn Cummings	President, E Ola Kākou Hawai'i Trustee, Malama:Cummings 'Ohana God Trust©	5	IV. DEMAND FOR PUBLIC ACCESS Under UIPA and HRS Chapter 92, we lawfully demand: 1. Complete access to: o All land title chains (LCAs, RPs, TMKs) o All archaeological reports, cultural assessments, burial records 2. Availability at all public hearings (print & digital) 3. Digital copies to be emailed to: manaeolakakouhawaii@gmail.com Failure to comply constitutes denial of due process, fiduciary breach, and obstruction of remedy.	Thank you for your comments. 1. Current real estate agreements are included in Appendix C of the Final EIS. Also, the Tax Map Key (TMK) parcel numbers have been added to Figures 1-3 and 1-4 in the Final EIS. Archaeological reports and the Cultural Impact Assessment may be found in Appendix F of the Final EIS. These were also available in the Draft EIS. It is outside the scope of this EIS to include land title chains or burial records. 2. In accordance with Hawai'i Administrative Rules (HAR) section 11-200.1-5(e)(5)(E), an audio file with consolidated verbal comments from the scoping meeting was published by the Office of Planning and Sustainable Development, Environmental Review Program (OPSD, ERP) in The Environmental Notice (TEN) on June 23, 2025 along with the Draft EIS. The oral scoping comments are transcribed and included in Appendix I of the Final EIS. An audio file with consolidated verbal comments from the Draft EIS comment meetings are part of the Final EIS submittal to the OPSD-ERP for publication in TEN. Transcripts from the Draft EIS comment meetings are included below in this matrix as part of Appendix I in the Final EIS. 3. The Draft EIS and Final EIS are available online at https://pmrf-kpgo-eis.com/ and on the OPSD, ERP's website and hard copies are available at the following public libraries: Hawai'i State Library, 478 S. King St., Honolulu, HI 96813; Līhu'e Public Library, 4344 Hardy St., Līhu'e, HI 96766; Waimea Public Library, 9750 Kaumuali'i Hwy, Waimea, HI 96796.	EIS Process
0002	Roslyn Cummings	President, E Ola Kākou Hawai'i Trustee, Malama:Cummings 'Ohana God Trust©	6	V. LIABILITY CLAUSE – NOTICE TO AGENT IS NOTICE TO PRINCIPAL All named individuals and affiliated institutions are hereby served notice: "Notice to agent is notice to principal. Notice to principal is notice to agent." — Maxim of Law Let it be known: Any government actor, agency, contractor, consultant, or license holder who proceeds without lawful consent, remedy, or recognition of ancestral standing and mo'okū'auhau rights shall be held personally liable for: • Trespass and unlawful conversion • Fraud and concealment • Cultural desecration • Willful environmental harm Under enforcement of: Malama:Cummings 'Ohana God Trust©	Your comment has been received. Thank you for your comments.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Claim of Damages / Transgression Fee Schedule (on file) Filed as Court of Record – Enforceable on Demand		
0002	Roslyn Cummings	President, E Ola Kākou Hawai'i Trustee, Malama:Cummings 'Ohana God Trust©	7	VI. SERVED PARTIES & EMAIL ADDRESSES University of the Nations, Kona • Martina Segura – martina.t.segura@hawaii.gov • David Hamilton – studentservices@uofnkona.edu • Jeff Overton – uofnkona@g70.design • Kiralee Ramos – kirar@g70.design Maui Aloha 'Āina Project • Shayne Agawa – shayne.agawa@mauicounty.gov • Keoni Gomes – gomes@aloha.net • Kyle Ginoza – ginoza@gmail.com • Comment inbox: environmental.mgmt@co.maui.hi.us PMRF / Kōke'e Park Project • Ian Hirokawa – ian.c.hirokawa@hawaii.gov • Kerry Ling – info@PMRF-KPGO-EIS.com • Shari Miller – gsfc-nepa@nasa.gov • Michele Lefebvre – michele.lefebvre@stantecgs.com O'ahu Subsea Cable Project • Kariann Stark – kariann.stark@hawaii.gov • Lauren Minford – lminford@subcom.com • Tanya Copeland – tanya.copeland@icf.com	Addressed parties are noted. Thank you.	Ongoing Activities
0003	Valerie Weiss		1	PMRF: In what way will the large scale RIMPAC exercises involve PMRF? Can you please list ALL the activities the Navy will be conducting on the property and off-shore. How much sonar will be used offshore and in what areas. We need to know what is taking place if we are not to oppose it. How many ships are to be scuttled off Kauai?	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. The Navy's offshore ongoing activities, including sonar exercises and vessel activities, are discussed in detail in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas Environmental Impact Statement (EIS/OEIS) and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA. Both documents are available online at https://www.pmrf-kpgo-eis.com/documents/.	Ongoing Activities
0003	Valerie Weiss		2	KPGO: How much ionizing radiation will NASA be generated from this location and at what hours for how long? Or will it be constant and continuous? What other dangers are possible with this facility operating at our park?	As discussed in Section 3.9.1.4.6 (Public Health and Safety/KPGO) of the Final EIS, NASA operations at KPGO do not generate ionizing radiation. The facility operates ground-based antennas for satellite communication and tracking, which emit non-ionizing radiofrequency energy similar to other communications facilities. Emissions are intermittent (only during satellite passes), not continuous, and are conducted in compliance with Federal Communications Commission, National Telecommunications and Information Administration, and Department of Defense exposure standards. Radiofrequency exposure above regulatory limits is confined to restricted areas immediately adjacent to transmitting antennas. No hazardous levels extend into publicly accessible areas, including lands at Kōke'e State Park. Other potential hazards are limited to routine occupational and facility safety considerations (e.g., electrical or mechanical risks), which are managed under established NASA safety programs. Accordingly, KPGO operations pose no ionizing radiation risk and no adverse effects to park visitors or surrounding communities.	Public Health and Safety
0004	Lisa Kitahara	Clean Air Branch Hawai'i State Department of Health | Ka	1	Thank you for the opportunity to review Draft Environmental Impact Statement of Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Vol 1, Appendices Vol 2., Appendices Vol 3., Appendices Vol 4., and the Public Scoping Meeting Audio Recording in the June 23, 2025 edition of the TENs. Please go to the Clean Air Branch (CAB) website to download and utilize our Standard Comments for Land Use Reviews. The link is included below.	The Navy and NASA thank the Clean Air Branch for their comments.	Air Quality and Greenhouse Gases

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
		‘Oihana Olakino		https://health.hawaii.gov/cab/clean-air-branch/standard-comments-for-land-use-reviews/		
0004	Lisa Kitahara	Clean Air Branch Hawai‘i State Department of Health | Ka ‘Oihana Olakino	2	Standard Comments for Land Use Reviews Clean Air Branch Hawaii State Department of Health July 3, 2024 All project activities shall comply with Hawaii Administrative Rules (HAR), Chapter 11-59 and 11-60.1. If your proposed project: Requires an Air Pollution Control Permit • You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch. • Permit application forms can be found here: https://health.hawaii.gov/cab/permitapplication- forms/	Required federal and State permits are discussed in Appendix E of the Final EIS, Hawai‘i Administrative Rules (HAR), Chapter 11-59 and 11-60.1 are included in Appendix E and would be complied with.	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	3	Has the potential to generate fugitive dust • You must reasonably control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near existing residences, businesses, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.	As discussed in Chapter 2 (Proposed Action and Alternatives) of the Final EIS, Alternatives 1 and 2 would not involve construction, renovation, or demolition of facilities and, therefore, no fugitive dust would be generated. As described in Section 3.10.2.4 (Air Quality and Greenhouse Gases/No Action Alternative) of the Final EIS, the No Action Alternative may include demolition activity that could produce dust. In such case, all applicable regulations related to air quality and all applicable air quality regulations identified in Appendix E would be followed.	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	4	• Construction activities must comply with the provisions of Hawaii Administrative Rules, §11- 60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, it is strongly recommended that buffer zones be established, wherever possible, in order to alleviate potential dust concerns.	See response to comment #3.	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	5	• You must provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following: o Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact; o Providing an adequate water source at the site prior to start-up of construction activities; o Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase; o Minimizing airborne, visible fugitive dust from shoulders and access roads; o Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and o Controlling airborne, visible fugitive dust from debris being hauled away from the project site.	See response to comment #3.	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	6	• If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch. Please also see fugitive dust fact sheet at: https://health.hawaii.gov/ cab/files/2024/02/Hawaii-Fugitive-Dust-Fact-Sheet-February-2024.pdf.	Thank you for the contact information.	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka	7	Includes construction, demolition, or renovation activities that involve potential asbestos and lead containing materials • Please contact the Indoor and Radiological Health Branch at (808) 586-4700 or visit: https://health.hawaii.gov/irhb/	Thank you for the contact information.	Air Quality and Greenhouse Gases

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
		‘Oihana Olakino				
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	8	Increases the population and potential number of vehicles in an area • The creation of apartment buildings, complexes, and residential communities may increase the overall population in an area. Increasing the population in an area may inadvertently lead to more air pollution via vehicle exhaust. Vehicle exhaust releases pollutants in the air that can negatively impact human health and air quality, including lung irritants, carcinogens, and greenhouse gases.	As discussed in Chapter 2 (Proposed Action and Alternatives) of the Final EIS, Alternatives 1 and 2 as well as the No Action Alternative would not involve the creation of apartment buildings, complexes, or residential communities and levels of vehicle exhaust would not change.	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	9	• Ensure that drivers keep vehicle idling times to three (3) minutes or less.	Comment noted.	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	10	• Consider and incorporate support for alternative transportation options such as bike racks and/or electric vehicle charging stations where possible.	Under Alternative 1, the Navy would continue to maintain the roads, bike path/trails, or other forms of access in the Region of Influence. As a resiliency solution, the Navy is assessing options to implement a composting facility for waste minimization, sustainability, environmental compliance, and community and environmental protection at PMRF as described in Section 1.3.6 (Background/Environmental Management and Protection, Table 1-4 of the Final EIS).	Air Quality and Greenhouse Gases
0004	Lisa Kitahara	Clean Air Branch Hawai’i State Department of Health | Ka ‘Oihana Olakino	11	If you have any questions, please contact the Clean Air Branch at (808) 586-4200 or at cab@doh.hawaii.gov.	The Navy and NASA appreciate the Clean Air Branch’s participation in the EIS process and review of the Draft EIS.	Air Quality and Greenhouse Gases
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	1	Thank you for your email to the Clean Water Branch with the subject: United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Koke'e Park Geophysical Observatory Real Estate Draft Environmental Impact Statement, Kaua'i, Hawai' i; Tax Map Keys: (4) 1-2-00 I :006 (por.), (4) 1-2-00 I :0 I 0, (4) 1-2-002:00 I (por.), (4) 1-2-002:0 IO (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-0 16:01 1 (por.), (4) 1-4-00 I :002 (por.), (4) 1-4-00I :0 13 (por.), (4) 1-4-00 I:014 (por.) The CWB Standard Project Comments Memorandum-for-CWB-Standard-Project Comments-07016CMHK.23-part-1-signed.pdf (hawaii.gov) are for agencies and project owners who are soliciting comments in fulfillment of their environmental review process. I have also enclosed CWB’s memorandum for your convenience. As mentioned in the memorandum, CWB no longer responds to every solicitation for comments. Instead, CWB offers the enclosed standard project comments which you may use as part of your environmental review process. Please let me know if you have any questions. Mahalo, Mike Kaneshiro	The Navy and NASA thank the Clean Water Branch, Hawai’i Department of Health (DOH) for their comments.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water	2	This memo is provided for your information and sharing. You are encouraged to share this memo with your project partners, team members, and appropriate personnel. The Department of Health (DOH), Clean Water Branch (CWB) will no longer be responding directly to requests for comments on the following documents (Pre-	Comment noted.	Water Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
		Branch Hawaii State Department of Health		consultation, Early Consultation, Preparation Notice, Draft, Final, Addendums, and/or Supplements): • Environmental Impact Statements (EIS) • Environmental Assessments (EA) • Stream Channel Alteration Permits (SCAP) • Stream Diversion Works Permits (SDWP) • Well Construction/Pump Installation Permits • Conservation District Use Applications (CDUA) • Special Management Area Permits (SMAP) • Shoreline Setback Areas (SSA)		
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	3	For agencies or project owners requiring DOH-CWB comments for one or more of these documents, please utilize the DOH-CWB Standard Comments below regarding your project's responsibilities to maintain water quality and any necessary permitting. DOH-CWB Standard Comments are also available on the DOH-CWB website located at: http://health.hawaii.gov/cwb/.	Comment noted.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	4	DOH-CWB Standard Comments The following information is for agencies and/or project owners who are seeking comments regarding environmental compliance for their projects with the Hawaii Administrative Rules (HAR), Chapters 11-53, 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. 1 . Any project and its potential impacts to State waters must meet the following criteria: a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected. b Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters. c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).	Alternatives 1 and 2 comply with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) in the Final EIS.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	5	2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for point source water pollutant discharges into State surface waters (HAR, Chapter 11-55). Point source means any discernible, confined, and discrete conveyance from which pollutants are or may be discharged. For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee ($1,000 for an individual NPDES permit or $500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: https://eha-cloud.doh.hawaii.gov/epermit/. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form. The DOH, Environmental Health Administration (EHA) e-Permitting Portal received Cross-Media Electronic Reporting Rule (CROMERR) certification by the Environmental Protection Agency (EPA) for electronic signature. Currently, Applicants and Permittees may now certify and submit EHA Electronic Signature Forms electronically	As described in Water Resources (Section 3.7.1, Affected Environment) of the Final EIS, Agribusiness Development Corporation (ADC) and County of Kaua'i have been issued a National Pollutant Discharge Elimination System (NPDES) permit for all outfalls of the Mānā Plain Drainage Ditch System (PERMIT NO. HI 0021952). The final permit was issued on August 22, 2025, and became effective on October 1, 2025. The permit identifies seven outfall sites; three of the seven are located on Navy fee simple land. The permit is discussed in more detail in Water Resources (Section 3.7.1.4.2.6, Surface Water Quality) of the Final EIS. The Navy will work with ADC and the County of Kaua'i to ensure compliance with the terms of the NPDES permit. The final permit is available on the DOH website at https://health.hawaii.gov/cwb/final-individual-permits/. ADC, Department of Land and Natural Resources (DLNR), and the Navy are determining a long-term strategy for these outfalls to ensure compliance should current roles change. Under the No Action Alternative, any removal of buildings, including demolition and clean up, would comply with all applicable regulations (including an NPDES permit) to prevent any effects to surface water quality.	Water Resources

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				through the EHA e-Permitting Portal without the need to physically send in an ink signature and CD/DVD/flash drive.		
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	6	Beginning January 31, 2023, the DOH-CWB will only utilize electronic signature e-Permitting forms and discontinue the hard-copy signature forms. All hard-copy signature certification e-Permitting forms, including compliance forms, will be inactivated. The electronic signature forms will require electronic signature approval to submit a form to the CWB. For details on how to obtain the electronic signature approval please visit CWB website located at: https://health.hawaii.gov/cwb/announcements/cwb-announces-new-reguirement-forelectronic-signature-approval-for-all-submissions-beginning-january-31-2023/. The NPDES NOI or application will be processed after the filing fees submitted and payable to the "State of Hawaii" in the form of a pre-printed check, cashier's check, money order, or as otherwise specified by the director is received by the CWB.	Comment noted.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	7	Some of the activities requiring NPDES permit coverage include, but, are not limited to: a. Discharges of Storm Water. i. For Construction Activities Disturbing One (1) or More Acres of Total Land Area. By HAR Chapter 11-55, an NPDES permit is required before the start of the construction activities that result in the disturbance of one (1) or more acres of total land area, including clearing, grading, and excavation. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. ii. For Industrial Activities for facilities with primary Standard Industrial Classification (SIC) Codes regulated in the Code of Federal Regulations (CFR) at 40 CFR 122.26(b)(14)(i) through (ix) and (xi). If a facility has more than one SIC code, the activity that generates the greatest revenue is the primary SIC code. If revenue information is unavailable, use the SIC code for the activity with the most employees. If employee information is also unavailable, use the SIC code for the activity with the greatest production. iii. From a small Municipal Separate Storm Sewer System (along with certain non-storm water discharges). b. Discharges to State surface waters from construction activity hydrotesting or dewatering. c. Discharges to State surface waters from cooling water applications. d. Discharges to State surface waters from the application of pesticides (including insecticides, herbicides, fungicides, rodenticides, and various other substances to control pest) to State waters. e. Well-Drilling Activities. Any discharge to State surface waters of treated process wastewater effluent associated with well drilling activities is regulated by HAR Chapter 11-55. Discharges of treated process wastewater effluent (including well drilling slurries, lubricating fluids wastewater, and well purge wastewater) to State surface waters requires NPDES permit coverage.	See response to comment #5 for information regarding the ADC and County of Kaua'i final NPDES permit.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State	8	NPDES permit coverage is not required for well pump testing. For well pump testing, the discharger shall take all measures necessary to prevent the discharge of pollutants from entering State waters. Such measures shall include, if necessary, containment of initial discharge until the discharge is essentially free of pollutants. If the discharge is entering a stream or river bed, best management practices (BMPs) shall be implemented to prevent the discharge from disturbing the clarity of the receiving water. If the discharge is entering a storm drain, the discharger must obtain	A list of best management practices (BMPs) and standard operating procedures regarding surface water quality management can be found in Table 3.7-2 in the Final EIS. Some examples include use of irrigation ditches as a sedimentation opportunity before discharge, use of commercial sand filters, and the installation of subsurface intake pipes at pump stations to prevent intake of floating debris/oil.	Water Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
		Department of Health		written permission from the owner of the storm drain prior to discharge. Furthermore, BMPs shall be implemented to prevent the discharge from collecting sediments and other pollutants prior to entering the storm drain.		
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	9	3. A Section 401 Water Quality Certification (WQC) may be required if your project/activity: a. Requires a federal license or permit; and b. May result in a discharge into waters of the United States (WOTUS). "License or permit" means any permit, certificate, approval, registration, charter, membership, statutory exemption, or other form of permission granted by an agency of the federal government to conduct any activity which may result in any discharge. The term "discharge" is defined in Clean Water Act, Subsections 502(16), 502(12), and 502(6). Examples of "discharge" include, but are not limited to, allowing the following pollutants to enter WOTUS from the surface, or in-water: solid waste, rock/sand/dirt, heat, sewage, construction debris, any underwater work, chemicals, fugitive dust/spray paint, agricultural wastes, biological materials, industrial wastes, concrete/sealant/epoxy, and washing/cleaning effluent.	All applicable permits are discussed in Appendix E. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background) and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. Under the No Action Alternative, any removal of buildings, including demolition and clean up, would comply with all applicable regulations (including a Section 401 Water Quality Certifications, NPDES permit, etc.) to prevent any effects to surface water.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	10	Determine if your project/activity requires a federal permit, license, certificate, approval, registration, or statutory exemption by contacting the appropriate federal agencies (e.g. Department of the Army (DA), U.S. Army Corps of Engineers (COE), Pacific Ocean Division Honolulu District Office (POH) Tel: (808) 835-4303; U.S. Environmental Protection Agency, Region 9 Tel: (415) 947-8021; Federal Energy Regulatory Commission Tel: (866) 208-3372; U.S. Coast Guard Office of Bridge Programs Tel: (202) 372-1511). If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the COE-POH regarding their DA permitting requirements. To request an individual Section 401 WQC, you must complete and submit the Section 401 WQC application together with $1,000 filing fee made payable to the "State of Hawaii" in the form of a check or other method specified by the department. This application is available on the e-Permitting Portal website located at: https://eha-cloud.doh.hawaii.gov/epermit/. The processing of a Section 401 WQC application will begin after the CWB has received filing fee. The processing of a Section 401 WQC application is also subject to the compliance with 40 CFR §121 requirements.	See response to comment #9 for information on permit compliance within the project area.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	11	Beginning January 31, 2023, the DOH-CWB will only utilize electronic signature e-Permitting forms and discontinue the hard-copy signature forms. All hard-copy signature certification e-Permitting forms, including compliance forms, will be inactivated. The electronic signature forms will require electronic signature approval to submit a form to the CWB. For details on how to obtain the electronic signature approval please visit CWB website located at: https://health.hawaii.gov/cwb/announcements/cwb-announces-new-reguirement-forelectronic-signature-approval-for-all-submissions-beginning-january-31-2023/. Please see HAR, Chapters 11-53 and 11-54 for the State's Water Quality Standards and for more information on the Section 401 WQC. HAR, Chapters 11-53 and 11-54 are available on the CWB website at: http://health.hawaii.gov/cwb/.	Comment noted.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State	12	4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapters 11-53 and 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of $25,000 per day per violation and up to two (2) years in jail.	See response to comment #9 for information on permit compliance within the project area.	Water Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
		Department of Health				
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	13	5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should: a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.	As discussed in Section 3.7.1.4.1.1 (Water Resources/Main Base) of the Final EIS, the agricultural land on the Mānā Plain is managed by ADC. With support from the Kekaha Agricultural Association (KAA) and the Navy; the DLNR, County of Kaua'i, and ADC are responsible for managing and maintaining the plantation-era engineered network of ditches, canals, drainages, as well as reservoirs that move and store water throughout the ditch system for agricultural use. The system provides a continuous gravity-fed irrigation system to the agricultural fields within the Region of Influence (ROI) and serves as storm drainage during large storm events, and also provides an opportunity for sedimentation prior to discharge, which can improve surface water quality. As discussed in Section 3.7.1.4.2.4 (Water Resources/Mākaha and Miloli'i Ridges) of the Final EIS, surface water at Mākaha Ridge is limited to non-potable water use and surface drainage. Stormwater is collected in water catchment basins situated atop several structures at the site and is used for irrigation, wildfire management, and other non-potable uses. See response to comment #14 regarding additional stormwater and water quality management strategies.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	14	b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.	A list of BMPs and standard operating procedures regarding surface water quality management can be found in Table 3.7-2 in the Final EIS. At Mākaha Ridge, the Navy is currently implementing critical erosion control management strategies to decrease erosion and improve surface water quality. These are discussed in detail in Section 3.7.1.4.2.4 (Water Resources/Mākaha and Miloli'i Ridges) of the Final EIS. These include installation of (to be completed in 2025/2026) an ungulate exclusion fence around the facilities, periodic culling of invasive ungulates within the fenced area, installation of a retaining wall, restoration of 6 acres of upland habitat of bare land and outplanting of native species (completed February 2026), and installment of stormwater catchment systems. Combined implementation of these BMPs decreases erosion, reduces sedimentation, and increases water quality in the streams and nearshore environment immediately downslope of the facility. These actions would be bolstered through the implementation of Enhanced Engagement-7 (Chapter 5, Table 5.2-1 of the Final EIS), which would establish success criteria for erosion management actions at Mākaha Ridge. Additionally, the Navy will continue to consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, as defined in the Department of Defense Unified Facilities Criteria (1-200-02, *High Performance and Sustainable Building Requirements*). Finally, the Navy and KAA are partnering in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement lands, which will reduce the amount and improve the quality of stormwater runoff discharged from agricultural drainage ditches into the nearshore environment at PMRF. This is discussed in more detail in Section 3.7.1.4.2.6 (Water Resources/Surface Water Quality) and shown in Figure 3.7-6 of the Final EIS.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water	15	c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.	See responses to comment #13 and #14 for more information on the use of stormwater BMPs.	Water Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
		Branch Hawaii State Department of Health				
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	16	d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.	There is no construction or design planned under any alternative on this project. See responses to comments #13 and #14 for more information on the use of stormwater BMPs and methods the Navy and NASA are utilizing to reduce excessive runoff.	Water Resources
0005	Mike Kaneshiro	Environmental Management Division | Clean Water Branch Hawaii State Department of Health	17	e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.	See response to comments #13 and #14 for more information on current bio-engineering projects. The EIS team appreciates Clean Water Branch's participation in the EIS process and thorough review of the Draft EIS.	Water Resources
0006	Russell Tsuji	None	1	I'd like to see the disclosure and studies related to the marine impacts related to the training activities occurring at Barking Sands on fast lands and in the ocean.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Effects to terrestrial biological resources from the Proposed Action are described in detail in Biological Resources (Section 3.4.2, Biological Resources/Environmental Consequences) in the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) FEIS EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. To review additional studies in the area, visit the Navy's Marine Species Monitoring Program website (https://www.navymarinespeciesmonitoring.us/), which serves as an online portal for information on the background, history, and progress of the program, as well as provides access to reports, documentation, data, and updates on current monitoring projects.	Water Resources
0006	Russell Tsuji	None	2	I understand that missiles are fired from below the surface (from submarines) and at surface (from boats/ships) of the ocean aimed at targets shot from the land at Barking Sands. I suspect there are impacts to marine life (T&E species) that ought to be disclosed and fully studied before the Land Board makes its final decision on whether to issue a new lease to the Navy. Thank you for allowing me to comment.	As noted in response to comment #1 above, effects to marine resources were analyzed in previous PMRF NEPA documents and are presented in Table 1-5 of the Final EIS.	Biological Resources
0007	Michael Jones	None	1	I have commented upon previous EIS documents for activities at PMRF including the Navy's Pacific Missile Range Facility Enhanced Capability draft and final EIS in 1998	The Navy and NASA thank you for your participation in the EIS process. A printed copy of Volume 1 of the PMRF KPGO Real Estate Draft EIS was mailed on July 3, 2025, to the address you provided.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				and am hereby requesting a printed copy of volume 1 of the 2025 PMRF and KPGO RE DEIS.		
0008	Larry Graff	Executive Director of PAL Hawaii	1	Aloha, My name is Larry Graff. I am the Executive Director of PAL Hawaii and co-host of a monthly radio talk show on KKCR. I would like to ask if someone from PMRF, preferably Capt. Brett Stevenson, would like to appear on our radio show to talk about PMRF and the lease renewal and the EIS. The show airs on July 28th from 4 to 6 PM and guests can call in rather than appearing in studio. I can be reached by email or directly at 808-738-6706. Please let me know if there is an interest or not. Our show runs during radio prime time for listeners at the end of the day returning from work and we are informed we have a considerably sized audience. Our show is meant to inform the people of Kauai regarding issues of the day and we try to present information in a fair and impartial manner. We believe the lease renewal and relationship with PMRF on Kauai is a vital issue that our listeners would like to hear about – call-in and ask questions. On a side note, I am also a Halau member who has participated in ceremony at PMRF with our Kumu and PAL Board Member Puna Dawson. I think having someone from PMRF on our show will be a positive experience.	The Navy and NASA appreciate your interest in the Project. In response to your request, the PMRF and KPGO RE EIS Navy Project Manager, Kerry Ling, attended the KKCR radio show with host Larry Graff on July 28, 2025.	Ongoing Activities
0009	Emma Schneck	Kauai News Now	1	Aloha PMRF team, I hope you are well. My name is Emma and I am a reporter for Kaua'i Now News. We are currently working on an article about the U.S Navy's state land agreement and related environmental impact statements and would love to get comments from someone on your team for the piece. Is there a time this week that I would be able to arrange a brief meeting with someone from your staff? Please let me know.	The Navy responded in writing to this request, and the commenter attended a media roundtable on July 11, 2025.	Ongoing Activities
0010	Michael Jones	None	1	Thanks for the reply. I am living in a retirement community and it is difficult to go out. I also have difficulty reading large amounts of text on a computer monitor. This is why I requested a print copy of the draft EIS. Volume 1 would be sufficient.	The Navy and NASA thank you for your participation in the EIS process. A printed copy of Volume 1 of the PMRF KPGO Real Estate Draft EIS was mailed on July 3, 2025, to the address you provided.	Ongoing Activities
0011	Valerie Weiss	Wailua Homesteads	1	After reading what is listed in the EIS I am not satisfied with it being thorough, regarding actual activities at sea and on land. I requested further info more than10 days ago and have received zero responses.	The Navy and NASA received your comments submitted via the website's comment form on June 24, 2025. Those comments are included in this table as comment #3, above. Please see responses to those comments under comment #3.	Ongoing Activities
0011	Valerie Weiss	Wailua Homesteads	2	As the USN knows Hawaii has been adversely affected on our islands in many ways by their activities and lack of clean up and care. I am concerned about UXOs, which remain dangerous on our islands at various locations. Hazardous materials, lead contamination and other waste were not addressed in what was available to the reader.	All hazardous materials and waste used or produced on leaseholds and easements are discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS. As discussed in Section 3.12.1 (Hazardous Materials and Waste/Affected Environment) of the Final EIS, materials containing lead include lead-acid batteries, lead-based paint, and certain solid and liquid propellants. All spent lead acid batteries and lead-based paint are disposed of or recycled in accordance with the PMRF Hazardous Waste Management Plan and the NASA Environmental Management Plan. Table 3.12-1 includes a list of the standard operating procedures and instruction manuals utilized in management of hazardous materials and waste at PMRF and KPGO. There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land. Recently, during an infrastructure upgrade project conducted on Barking Sands, it was determined that a full Explosive Safety Submittal was required in that project area (over 7 miles of area), and several pieces of munitions and explosives of concern were located and disposed. The Navy strives to provide long-term resource protection, and works with neighboring communities to respond to requests for cleanup. For example, in 2024, the Navy partnered with a local business and volunteers to clear debris from an old missile crash that occurred almost 60 years ago on Department of Hawaiian Home	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					Lands (DHHL) land in Niu Valley, Kaua'i. PMRF responders cleared approximately 2,300 pounds of debris from the site, and all recyclable debris was disposed of properly at a recycling center in Līhu'e. This effort will allow for more effective land use for DHHL purposes, and demonstrates the Navy's commitment to response and recovering of military debris.	
0011	Valerie Weiss	Wailua Homesteads	3	There was not a word about the nearby ocean activities or use of sonar, but there was a minimal mention of RIMPAC which brings horrendous marine environmental damage in itself, every 2 years with the huge number of invited countries participating, the ongoing sinking of (cleaned) ships for target practice, etc..	The Navy and NASA respect your concerns regarding other military operations; however, the Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including lease, easements, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0011	Valerie Weiss	Wailua Homesteads	4	There was no mention in this EIS draft of how many retired Naval ships will be scuttled for practice, adding more foreign junk to our oceans. (No they are not reefs, they are junk and do not add to the fish population. They only attract fish already nearby, studies have shown.)	As noted in response to comment #3 above, the scope of the EIS includes land-based leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. Effects to marine resources were analyzed in previous PMRF NEPA documents and are presented in Table 1-5 of the Final EIS. The Navy's Marine Species Monitoring Program website (https://www.navymarinespeciesmonitoring.us/) serves as an online portal for information on the background, history, and progress of the program, as well as provides access to reports, documentation, data, and updates on current monitoring projects.	Cumulative Effects
0011	Valerie Weiss	Wailua Homesteads	5	For the NASA GEOPHYSICAL OBSERVATORY in Kokee State Park, there was no mention of the amount of ionizing radiation it will produce or for what periods. The mapping and data collection would be better done away from the park location where people flock for its natural setting, hiking, etc. Certainly not to receive ionizing radiation. Valerie Weiss Wailua Homesteads Kauai	The Navy and NASA respect your concerns regarding the potential for impacts to human health and safety from ionizing radiation. As discussed in Section 3.9.1.4.6 (Public Health and Safety/KPGO), NASA operations at KPGO do not generate ionizing radiation. The facility operates ground-based antennas for satellite communication and tracking, which emit non-ionizing radiofrequency energy similar to other communications facilities. Emissions are intermittent (only during satellite passes), not continuous, and are conducted in compliance with Federal Communications Commission, National Telecommunications and Information Administration, and Department of Defense exposure standards. Radiofrequency exposure above regulatory limits is confined to restricted areas immediately adjacent to transmitting antennas. No hazardous levels extend into publicly accessible areas, including lands at Kōke'e State Park. Other potential hazards are limited to routine occupational and facility safety considerations (e.g., electrical or mechanical risks), which are managed under established NASA safety programs. Accordingly, KPGO operations pose no ionizing radiation risk and no adverse effects to park visitors or surrounding communities.	Public Health and Safety
0012	Shaun Wolfe		1	Aloha, I would like to submit written testimony regarding the draft EIS: I strongly urge the rejections of the draft EIS from Nasa and the US Navy in an attempt to retain the PMRF and KPGO lands on Kaua'i. These areas include conservation zones and wahi pana. These lands were taken from Hawaiians without consent and desecrated as part of a long colonial history in Hawai'i. The DEIS says	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Section 3.3.2.1 (Cultural Practices/Approach to Analysis) of the Final EIS describes what a "significant effect" to cultural practices would be: new restrictions on access to locations where cultural practices occur, and the practice cannot be accomplished in another location. Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes how cultural practitioners can	Cultural Practices

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				there is an adverse impact to cultural access but deems this impact insignificant, which after living in a largely Kānaka Maoli community for the last 3 years, I can tell you that is absolutely not the consensus amongst Hawaiians. The lack of access violates indigenous rights to practice culture and access sacred sites.	obtain access to PMRF and KPGO. Even though access for cultural practices is limited due to security restrictions, it is not forbidden. Because PMRF and KPGO have procedures in place for cultural practitioners to come onto the installations to conduct protocol, the impact does not meet the criteria of "significant." PMRF recognizes that these restrictions are an adverse impact, and to lessen that impact , Enhanced Engagement-2 (see Table 5.2-1 in Final EIS) will streamline access to PMRF for traditional Hawaiian cultural practitioners through development of a PMRF Access Management Plan.	
0012	Shaun Wolfe		2	The DEIS also minimizes military activity which causes soil erosion, increased wildfire risk, and habitat destruction. The DEIS also claims that there would be a significant adverse impact on the biological resources of these lands if the no action alternative goes into place. I think that that is completely dependent on who these lands are stewarded by. If the lands go to the people of Hawai'i, we will see incredible stewardship and an ecosystem in much better health, as we've seen time and time again (He'eia is a great example).	Soil erosion, wildfire, and effects to habitats are addressed throughout Chapter 3 (Affected Environment and Environmental Consequences) of the Final EIS. For example, as discussed in Water Resources (Section 3.7.1.4.2.4, Mākaha and Miloli'i Ridges), the Navy implements critical erosion control management strategies at Mākaha Ridge, which has been identified as highly eroded. Under Alternative 1, these management actions would remain, and be bolstered through the implementation of Enhanced Engagement-7 (Chapter 5, Table 5.2-1 of the Final EIS), which would establish success criteria for erosion management actions at Mākaha Ridge. As described in Public Health and Safety (Section 3.9.1, Affected Environment) and Biological Resources (3.4.1, Affected Environment) of the Final EIS, PMRF ensures that launch areas are maintained free of flammable vegetation and therefore have minimal fire potential, non-native areas are regularly mowed, areas adjacent to pads are pre-soaked with water prior to launch, and fire and emergency service crews are present at every launch. Additional wildfire management information is discussed in Section 4.1.2.4 of the 2023 PMRF Integrated Natural Resources Management Plan (Appendix K) of the Final EIS. Section 2.3.3 (Proposed Action and Alternatives/Alternative 3: No Action Alternative) of the Final EIS includes the analysis of the No Action Alternative. Under this alternative, the land would be transferred back to the State of Hawai'i. As the outcome of the No Action Alternative is unknown, the conclusion has been revised in the Final EIS to not include a significance determination.	Biological Resources
0012	Shaun Wolfe		3	Furthermore, the DEIS ignores both marine and freshwater impacts including noise pollution impacts on marine mammals and the US military's long history in Hawai'i of poisoning freshwater sources.	Impacts to freshwater resources, which include groundwater, surface water, wetlands, and floodplains within the Region of Influence (ROI) are discussed in Section 3.7 (Water Resources) of the Final EIS. Section 3.7 (Water Resources) of the Final EIS also includes Table 3.7-2 which outlines the many management actions that are utilized by the Navy and NASA in protection of water resources in the ROI. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources
0012	Shaun Wolfe		4	I urge you to reject this DEIS and let the leases expire so these lands can be restored to the highest level of ecological health and colonial wounds of the past and present can begin to heal. Kaua'i is not a war testing ground. It is the homeland of Hawai'i's indigenous people and has been for over two millennia. Let the leases expire and watch aloha 'āina stewardship happen.	The Navy and NASA note your support for the No Action Alternative.	Action Alternatives

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0013	Frank O. Hay		1	Testimony in Strong Support of Continued Leases at PMRF and the Koke'e Geophysical Observatory	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Our team received your comment on July 12, 2025, but was not able to open the attachment. Our team sent an email to kokee@okauai.com dated July 16, 2025, requesting you resend your attachment, but received no response.	General Support
0014	Richard Gioscia		1	See attached file regarding negative impact of base traffic on the Kekaha community.	The Navy and NASA appreciate your participation in the EIS process. The Navy and NASA received your comment submitted July 12, 2025, via the EIS website comment form. Although your comment referenced an attachment, there was no document attached. The Navy and NASA emailed you at richardmgioscia@gmail.com on July 16, 2025, requesting you resubmit your comment with the attachment. The Navy and NASA received another submittal from you on July 20, 2025, see comment #32 below.	Transportation
0015	Maria Walker		1	Aloha, I am writing to you to express my support for Option 3, that no new leases are granted for the land in question at Mana and Koke'e. I am especially opposed to Option 2, which appears to be an opportunity for the Navy and NASA to purchase the lands they are currently using instead of leasing them.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your support for the No Action Alternative.	Action Alternatives
0015	Maria Walker		2	I believe that the US Military's use of Kaua'i's natural resources has an enormously negative effect on our natural environment and our community. The supposed positive impact on our economy, and the jobs that result from this military presence, in no way compensates for the destruction of our aina and surrounding waters, the desecration of historical, cultural and burial sites, and the exclusion of all residents and visitors from using the beaches and near shore waters in Mana.	The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. The Navy and NASA respect your concerns related to the natural environment and community relations. As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs.	Ongoing Activities
0015	Maria Walker		3	It should be painfully obvious at this point that the US military cannot be trusted to responsibly care for any site it is given to manage, and that their land and water usage in Hawai'i has consistently proven to be detrimental to the health of our land, our fresh and salt waters, our air and our residents' personal health and well being. No matter what agreements or promises are made, all branches of the US military have shown that they do not respect the land or the trust that they have been granted by the state; they fail to uphold their responsibilities, and any effort to make the military clean up or mitigate impacts is met with evasion, obfuscation, and flat out refusal. Red Hill, Kaho'olawe, and Pohakuloa are just a few recent examples of the ruinous and heedless practices of the military and their subsequent refusal to take any responsibility for their actions and the toxic waste, poisoned water and ordinance that result from their actions.	Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation. PMRF strives to provide long-term resource protection and works with neighboring communities to respond to requests for cleanup. For example, in late 2022, the Department of Hawaiian Home Lands (DHHL) identified debris from an almost 60-year old missile on DHHL lands in Niu Valley, Kaua'i. After discovery, PMRF organized an immediate Explosive Ordnance Disposal response, and determined that there was no immediate threat to the public or the environment, and began removal planning. In 2024, the PMRF Public Works and Stewardship office partnered with a local business and volunteers to clear approximately 2,300 pounds of debris from the site, and all recyclable debris was disposed of properly at a recycling center in Līhu'e. This	Public Health and Safety

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					removal effort will allow for more effective land use for DHHL, and demonstrates the Navy's commitment to response and recovery of military debris. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill, Pōhakuloa, and Kahoʻolawe are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. In an effort separate from this EIS, the State of Hawaiʻi published a new website in September 2025 to provide the public more access to information about military land leases in Hawaiʻi (https://engage.hawaii.gov/).	
0015	Maria Walker		4	These leases all over the state are usually rented for absurdly small sums with little taxes paid, and with no formal recourse for the counties to try to regulate the military's behavior or enforce compliance with environmental regulations or cultural protocols. I do not believe there are any positive impacts from this military presence on Kaua'i that could possibly be considered a reasonable trade off for the damage our island and people suffer from the leasing of these lands.	Please note that under Alternative 1, the leases and easements would be negotiated with the State for fair market value. Under Alternative 1, as required by Hawaiʻi Revised Statutes (HRS) section 10-13.5, 20 percent of lease revenue generated by current real estate agreements would be paid to the Office of Hawaiian Affairs (OHA). The rest of the revenue would go to the Special Land Development Fund per HRS section 171-19. By increasing the amount of funds paid to OHA, Alternative 1 would help increase OHA's ability to provide for the betterment of the conditions of Native Hawaiians, and the increased amount of funds paid to the Special Land Development Fund would increase the State's ability to fulfill the public land trust obligations as described in Land Use and Access (Section 3.5.2, Environmental Consequences) of the Final EIS. Under Alternative 2, 20 percent of any proceeds from the fair market value purchase of the leasehold parcels, as required by State law, would be paid to OHA, and the rest to the Special Land Development Fund. These payments would result in a short-term beneficial effect, and proceeds would result in a short-term increase in funds paid to OHA as described in Land Use and Access (Section 3.5.2, Environmental Consequences) of the Final EIS. PMRF is the foundation of technology-based business on Kauaʻi. As the largest high-tech and third largest overall employer on Kauaʻi, PMRF employs about 900 people, including defense personnel and civilian contractors. PMRF contributes approximately $150 million annually in salaries, contract goods, and services to the local economy. In addition to economic contributions, PMRF is involved with the local community, including participating in and supporting events on Kauaʻi as described in Socioeconomics (Section 3.6.1, Affected Environment).	Land Use and Access
0015	Maria Walker		5	In addition, PMRF's presence means that every other year our island and our oceans suffer the disaster that is RIMPAC, and makes Kaua'i a year round target for any country wishing to bomb a military installation belonging to the US. Mahalo for hearing my comments. Maria Walker	The Navy and NASA respect your concerns regarding other military operations; however, the Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easements, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025	Public Health and Safety

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	1	The NAVY has not done an EIS study for PMRF since 1998. They are not meeting their legal and moral obligations to understand their impact. Last year, the NAVY proposed to TRIPLE activities at PMRF without doing an EIS, and instead argued that tripling the activities at PMRF would have no significant impacts on the environment and people. That's a lie. The NAVY is once again neglecting their obligations and using technicalities to avoid accountability. Hewa. Now, the NAVY is doing an EIS that ignores most of their impact on land and at sea. This EIS will not cover the "fee simple" land on the base that the NAVY "owns."	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. A list of HEPA (Hawai'i Revised Statutes Chapter 343) and National Environmental Policy Act (NEPA) environmental review documents, prepared for activities at PMRF, is included in Table 1-5 of the Final EIS, including multiple Environmental Assessments (EAs) and EISs completed between 1998 and now. As described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the Navy's current and proposed use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training. As stated in Section 1.1 (Project Introduction and Overview) of the EIS, "Approximately 95 percent of the easement lands are passively used for encroachment buffers and mission readiness, the remaining 5 percent of easement lands are used for access and utility easements. No ground-based training occurs on these leasehold and easement lands." The Proposed Action is described in Chapter 2 of the Final EIS, and includes two action alternatives (Section 2.3, Alternatives Carried Forward for Detailed Analysis), Alternative 1 which includes securing new real estate agreements (Section 2.3.1, Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2, Alternatives Carried Forward for Detailed Analysis/Alternative 2: Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds). Neither action alternative includes additional development or change in current uses. Navy training and testing operations do not occur on State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS.	Cumulative Effects
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	2	From a 2010 document we know that the base had tens of thousands of gallons in fuel storage tanks, but this EIS does not give us information or recent test results to prove that these hazardous materials are stored safely. After the disaster of Red Hill, the burden is on the NAVY to show they are taking care of the: 9x 50,000-gallon underground storage tanks (USTs) located at the Fuel Farm 1x 30,000-gallon UST located at the Power Plant 2x 5,000-gallon USTs at the Navy Exchange 3x 5,000-gallon USTs at the gasoline station, and one 1,000-gallon UST at the Calibration Lab 2x 6,000-gallon diesel aboveground storage tanks (ASTs) 1x 1,000 gallon AST at Makaha Ridge 3x 200-gallon ASTs near building 510 and one 1,000-gallon AST near building 450 1x UST and x1 10,000-gallon AST at KTF The NAVY has lied, misled and deceived the public about the status of fuel storage at Red Hill. Now, they hide information from the public through procedure and technicalities to avoid accountability for these tanks on Kauai. Hewa.	The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. Fuel storage in the Final EIS reflects current storage at Mākaha Ridge. The one 1,000-gallon aboveground storage tank (AST) at Mākaha Ridge, as referenced in the 2010 PMRF Intercept Test Support EA/OEA, has been decommissioned, drained, and all associated piping has been removed. In 2021, the referenced ASTs at Mākaha Ridge (two 6,000-gallon tanks), were upgraded to 8,000 gallons each; this amount is reflected in Table 3.12-4 of the Final EIS. The ASTs and underground storage tanks (USTs) located at the Fuel Farm, Power Plant, Navy Exchange, gasoline station, Calibration Lab, near buildings 450 and 510, and the 10,000-gallon AST at Kaua'i Test Facility are located on fee simple land, and are therefore not analyzed in this EIS. However, these ASTs and USTs are disclosed in	Hazardous Materials and Waste

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					the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1 of that EA, which is publicly available and can be found on the EIS website (www.pmrf-kpgo-eis.com). All ASTs are equipped with a secondary containment device (i.e., steel basin, double-walled steel tank) and all USTs are equipped with advanced leak detection systems. Risk assessments are conducted for all storage tanks at PMRF by a third-party environmental engineering firm every 2 years. Per State of Hawai'i Department of Health regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all USTs. Please see Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS for more information. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	3	Endangered, native, and endemic species can be found on the lease and fee simple lands and waters nearby. This includes honu and monk seals, a large variety of native birds, native flies, native plants, and more. There are many significant impacts. A few are: rocket launches that make sound disturbances and can ignite vegetation disturb the land habitat; amphibious assaults disturb the beach habitat; and the missiles launched and vessels swarming the oceans disturb the ocean habitats of these critical species. Hewa.	The Final EIS discusses the endangered, native, and endemic species that are found on the leasehold and easement lands in Section 3.4 (Biological Resources). Although fee simple lands are not within the scope of this EIS, many of the management practices that are used on leasehold and easement lands are also implemented on fee simple lands. Effects from ongoing activities to all terrestrial resources, to include avian and invertebrate wildlife, and marine resources, to include the monk seals and sea turtles that utilize the terrestrial Region of Influence (ROI), are described in Section 3.4.2 (Biological Resources/Environmental Consequences) of the Final EIS. As described in Section 3.4.2.2.2 (Biological Resources/General Wildlife) of the Final EIS, previous NEPA documents have concluded that after launch activities, wildlife returns to normal behavior within a short time and that noise created from launches is infrequent. As discussed in Public Health and Safety (Section 3.9.1.4.1, Main Base), PMRF ensures that launch areas are maintained free of flammable vegetation and therefore have minimal fire potential. Non-native areas are regularly mowed, areas adjacent to pads are pre-soaked with water prior to a launch, and fire and emergency service crews are present at every launch. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	4	They hide the impact of their operations in another way. Where do the missiles launched from PMRF go? Where do the aircraft launched there drop their bombs? What does the high tech monitoring equipment at PMRF and in Kokee look at?	The impacts from launching missiles are analyzed in the 1998 PMRF Enhanced Capability Final EIS (https://www.pmrf-kpgo-eis.com/media/abefwgdu/004_1998-pmrf-enhanced-capability-final-eis-volume-1.pdf). Summarized information about this analysis is available in Table 3.1-4 of the Final EIS.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					KPGO does not conduct or support weapons testing or missile/aircraft operations. Its function is limited to operating ground-based antennas and monitoring equipment used for satellite communications and tracking. The observatory's systems receive and transmit signals to satellites in orbit, providing data for space research, environmental monitoring, and national security communications. The equipment is designed for signal detection, tracking, and communications only; it does not observe or direct weapons or flight operations.	
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	5	The NAVY blasts, bombs, and sonar attacks the ocean and the islands to our west, including Kaula and Ko Hawaii Pae Aina in Papahanaumokuakea. A small sample of ocean harm to marine mammals the NAVY projects in 7 years is: 52,470 "takes" on kohola, humpback whales, including 19,028 in Hawaii alone 9,228 "takes" on endangered ʻīlio holo i ka uaua, Hawaiian Monk Seals 349,184 "takes" on bottlenose dolphins in Hawaiian waters alone 982 "takes" on endangered False Killer Whales in Hawaii waters, and 25,700 on all false killer whale populations in Hawaii (not all populations are endangered) 63,569 "takes" on spinner dolphins in Hawaiian waters alone 93,784 "takes" on threatened or endangered blue and fin whales across the pacific Hewa. The NAVY is concealing this information from the people of Kaua'i by breaking it into a separate document called the Hawaii-California Ocean EIS. The Hawaii BLNR is not shown and asked to review for these lease renewals. They make a fake separation between what is happening on land and what is happening in our oceans, but we know that this is wrong. The ocean and the land, aina, cannot be broken apart like this.	As noted in response to comment #3 above, the scope of the EIS includes land-based leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. Effects to marine resources, including threatened and endangered marine species, were analyzed in previous PMRF NEPA documents and are presented in Table 1-5 of the Final EIS. Please note that your numbers reflect the summation of estimated takes from both Alternative 1 and Alternative 2 in the 2025 HCTT Final EIS/OEIS. The Navy will only implement Alternative 1 as outlined in the November 26, 2025, Record of Decision on the 2025 HCTT Final EIS/OEIS. The number of takes written in your comment would not occur. This information is publicly available on the HCTT EIS/OEIS website and is also included on the EIS website at https://pmrf-kpgo-eis.com/documents. For additional public information regarding marine resources, visit the Navy's Marine Species Monitoring Program website (https://www.navymarinespeciesmonitoring.us/), which serves as an online portal for information on the background, history, and progress of the program, as well as provides access to reports, documentation, data, and updates on current monitoring projects.	Biological Resources
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	6	PFAS (aka forever chemicals) were identified in the soil and groundwater at a former firefighting training site on PMRF in the 1960s. In 65 years, the NAVY still hasn't dealt with this. They say they're still "investigating" and don't even know how big it is or what they will do to manage it. Hewa. And did the NAVY commit to cleaning up their messes if they are expelled from these leased lands? No. The NAVY says they "could" clean up, or they could leave things like forever chemicals and landfills with old aircraft in place. They would negotiate with the "state" to manage these desecrations, making no commitments to clean things up and restore them. Hewa.	The Navy and NASA note your concerns regarding clean up and restoration. Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the Hawai'i Department of Health during the Remedial Investigation process.	Hazardous Materials and Waste
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	7	The NAVY also holds the lease for 7,680 acres of underwater lands, which they are not trying to renew but claim they will continue to use the same way. Once again, they are trying to exploit public resources without accountability.	As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. For information regarding at-sea military readiness activities, review the 2025 HCTT Final EIS/OEIS, available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice	8	Like with the $1 leases, they will also try to avoid paying for the use of public areas. Hewa. This EIS also lies about the land the base is on, claiming it was "ceded." The illegal occupation of unceded Hawaiian Kingdom lands is significant and high impact. Saying the lands are "ceded" is a deliberate choice to legitimize the ongoing illegal US	Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. As described in Section 3.5.2 (Land Use and Access/Environmental Consequences) for Alternatives 1 and 2 in the Final EIS, the U.S. Government would enter into new leases and	Ongoing Activities

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		for Peace Hawaii		military occupation of Hawaiian lands and waters, and to minimize the impacts of the occupation. Hewa.	agreements with the State for fair market value of the leasehold and easement lands in the Project Area following negotiations with the Department of Land and Natural Resources (DLNR). The agreements would benefit the State financially, and approximately 20 percent of proceeds going first to Office of Hawaiian Affairs (OHA) (as described in Sections 3.5 [Land Use and Access] and 3.6 [Socioeconomics] of the Final EIS). The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	9	The NAVY invites genocidal war criminal states like Israel to Hawaii, Israel who slaughters and starves Palestinans daily for the past 18 months. They come to participate in the war games like RIMPAC off the coast of Kauai, training together to better integrate their military operations. They are not welcome here and hosting them makes the people of Kauai and Hawaii complicit in their war crimes. Hewa.	Although the Rim of the Pacific (RIMPAC) exercise is outside the jurisdiction and scope of this EIS, your opposition to military training activities in Hawai'i is noted. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. In an effort separate from this EIS, the State of Hawai'i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/).	Ongoing Activities
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	10	RIMPAC brings together the militaries of 29 nations to participate in war games, like SINKEX. For the 2024 SINKEX they sank a 40,000-tonne amphibious assault vessel off the shores of Hawaii. There is no environmental impact survey on the regular sinking of these vessels, or of hosting these vast military exercises. Hewa. All this hewa leads me to say these things: no base at PMRF.	As noted in response to comment #3 above, the scope of the EIS includes land-based leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. Effects to marine resources were analyzed in previous PMRF NEPA documents and are presented in Table 1-5 of the Final EIS.	Ongoing Activities
0016	Lana Bilbo	Kauai for Palestine, Jewish Voice for Peace Hawaii	11	The EIS is insufficient. I support the No Action Alternative. Restore the land and water, and get the military off of Kaua'i. We cannot just uproot, however. We need to build and to think of restoration. As shown with the Na Wai Eha ruling on Maui, the government has a responsibility to proactively protect and restore water for public good when the opportunity presents itself. If we restore the land, and restore some of the water to Mana, what can be born? Wetlands with plants to clean the earth. Restored cultural practices such as paddling canoes, working loi and harvesting, sustaining and being sustained by loko i'a. Restoring habitat and native plants for reconnection for the native birds, hula, oli, and prayer. These are the things we can grow if we center aina over destruction. Sincerely, Lana B.	The Navy and NASA note your opposition to the Proposed Action. The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As discussed in Biological Resources (Section 3.4.1, Affected Environment), several species of Hawaiian waterbirds regularly utilize wetland areas adjacent to the ROI including Kawai'ele Waterbird Sanctuary and Mānā Plains Forest Reserve as well as degraded aquatic habitat. Under the No Action Alternative, the Navy could no longer pay operation and maintenance costs for the Kawai'ele Pump Station (KPS). If the State chooses not to operate KPS, there could be increased surface water levels and flooding of low-lying areas of the Mānā Plain (including flooding of the Kawai'ele Bird Sanctuary) due to the unique hydrology of the area. Flooding of this area could submerge vegetation and decrease nesting and foraging habitat for some wetland-dependent wildlife. This is addressed in Water Resources (Section 3.7.2.4.1, Main Base). In an effort to support native ecosystem restoration and mitigate for flooding events, PMRF and Kekaha Agricultural Association are partnering in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain, which will improve the quality of stormwater runoff discharged from agricultural drainage ditches into the nearshore environment at PMRF and will promote the regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds. This area is shown in Figure 3.7-6 in the Final EIS.	Water Resources
0017	Kaimana Kinzie		1	To whom it may concern, I thank you for accepting public comments regarding the PMRF/NASA DEIS 2025 and the effort put forth in creating the DEIS. I stand in	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your opposition to all three alternatives is noted. The Navy and	General Opposition

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				opposition to all three alternatives presented in the DEIS based on inaccurate and contradictory terminology. These terms include but are not limited to “ceded lands”.	NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	
0017	Kaimana Kinzie		2	In Volume 1. Section 3.5.1.4, a history of ceded lands, the DEIS explains that the U.S. annexed the Hawaiian Islands via joint resolution of Congress and that Hawaiian territory was then ceded to the U.S. However, as the Navy and U.S. government are aware, the Newland’s Resolution (joint resolution 1898) was a work-around to an unsuccessful treaty of cession that was not only unilateral in nature but contrary to the wishes of the Hawaiian population as is evident in the 1897 Ku‘e Petitions. In other words, the U.S. passed a bill attempting to acquire foreign territory without a formal agreement (embodied in a treaty) between it and the independent state of the HK (Hawaiian Kingdom). Extraterritorial laws would apply to the effectiveness and limits of said bill and are viewed as an unconventional if not illegal process to acquiring sovereign territory through the lens of international law.	Thank you for adding this additional context and historical perspective. The Navy and NASA have noted this information, although page limitations prevent us from adding it to the Final EIS.	Land Use and Access
0017	Kaimana Kinzie		3	Section 3.5.1.2 states that “state lands” were formally crown and government lands of the HK, “taken” by the Republic of Hawaii and later “ceded” to the U.S. in 1898. The Republic of Hawaii and the Provisional Government are one in the same, the former being a rebrand of the same insurgents that instigated the overthrow of the Hawaiian Monarchy with direct assistance by U.S. military armed forces. The Provisional Government was neither a government de facto nor de jure according to the Blount Report of 1893 and President Grover Cleveland. Moreover, President Cleveland stated to Congress that the Provisional Government owes its existence to an armed invasion by the U.S. military. Consequently, the Republic of Hawaii was an illegitimate government of the Hawaiian Kingdom, propped up by American imperialists, and as admitted in this section, “took” HK government and crown lands. Based upon these facts, it would be impossible for the Republic of Hawaii to cede land to the U.S. as that would imply that the Republic was the legitimate successor of the Hawaiian Monarchy and that a treaty of cession between it and the U.S. exists. Such a treaty does not exist, nor was the Republic of Hawaii a legitimate government. Therefore, the U.S. government hadn’t acquired any territory in the Hawaiian Islands by any legal means and certainly not by cession.	Thank you for adding this additional context and historical perspective. The Navy and NASA have noted this information, although page limitations prevent us from adding it to the Final EIS.	Land Use and Access
0017	Kaimana Kinzie		4	It is remarked by Keao NeSmith in Volume 3 Appendices pg. 69 that the Hawaiian Kingdom continues to exist as an independent state, a designation that it has maintained since 1843. Moreover, NeSmith states that the HK is and has been occupied by the U.S. and its proxies since 1893, beginning with the landing of U.S. troops on Hawaiian soil. It is crucial to note, that as there exists no legal acquisition of land in Hawaii by the U.S., then its mere presence in the HK from 1893 till present would constitute a prolonged occupation by the U.S. government and its military. As such, the laws of occupation and international humanitarian law would apply to all HK boundaries and territories as well as its inhabitants. My recommendation to the Navy/NASA as well as the State of Hawaii is to review the above comments and facts more closely to better discern the actual relationship between the HK and the U.S. Furthermore, if in fact occupation of the HK, after exhausting all historical records and accounts to the contrary, is currently taking place by the U.S., then I would strongly suggest compliance to occupational law and international humanitarian law.	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework.	Land Use and Access
0017	Kaimana Kinzie		5	It is for the reasons previously stated that I object to all alternatives presented in the DEIS until such time that the terminology therein is changed to more accurately represent the status of the lands in question. I suggest removing the term “ceded lands” and replacing it with the term “seized” or “occupied lands”. This would more accurately describe the lands in question and more importantly bring into play a different set of regulatory laws designed to deal with the updated terminology.	Your opposition to all three alternatives is noted. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Action Alternatives

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				Mahalo for your consideration of these comments, -Kaimana K Kinzie		
0018	Kaimana K Kinzie		1	To whom it may concern, I thank you for accepting public comments regarding the PMRF/NASA DEIS 2025 and the effort put forth in creating the DEIS. I stand in opposition to all three alternatives presented in the DEIS based on inaccurate and contradictory terminology. These terms include but are not limited to “ceded lands”.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your opposition to all three alternatives is noted. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Action Alternatives
0018	Kaimana K Kinzie		2	In Volume 1. Section 3.5.1.4, a history of ceded lands, the DEIS explains that the U.S. annexed the Hawaiian Islands via joint resolution of Congress and that Hawaiian territory was then ceded to the U.S. However, as the Navy and U.S. government are aware, the Newland’s Resolution (joint resolution 1898) was a work-around to an unsuccessful treaty of cession that was not only unilateral in nature but contrary to the wishes of the Hawaiian population as is evident in the 1897 Ku‘e Petitions. In other words, the U.S. passed a bill attempting to acquire foreign territory without a formal agreement (embodied in a treaty) between it and the independent state of the HK (Hawaiian Kingdom). Extraterritorial laws would apply to the effectiveness and limits of said bill and are viewed as an unconventional if not illegal process to acquiring sovereign territory through the lens of international law.	Thank you for adding this additional context and historical perspective. The Navy and NASA have noted this information, although page limitations prevent us from adding it to the Final EIS.	Land Use and Access
0018	Kaimana K Kinzie		3	Section 3.5.1.2 states that “state lands” were formally crown and government lands of the HK, “taken” by the Republic of Hawaii and later “ceded” to the U.S. in 1898. The Republic of Hawaii and the Provisional Government are one in the same, the former being a rebrand of the same insurgents that instigated the overthrow of the Hawaiian Monarchy with direct assistance by U.S. military armed forces. The Provisional Government was neither a government de facto nor de jure according to the Blount Report of 1893 and President Grover Cleveland. Moreover, President Cleveland stated to Congress that the Provisional Government owes its existence to an armed invasion by the U.S. military. Consequently, the Republic of Hawaii was an illegitimate government of the Hawaiian Kingdom, propped up by American imperialists, and as admitted in this section, “took” HK government and crown lands. Based upon these facts, it would be impossible for the Republic of Hawaii to cede land to the U.S. as that would imply that the Republic was the legitimate successor of the Hawaiian Monarchy and that a treaty of cession between it and the U.S. exists. Such a treaty does not exist, nor was the Republic of Hawaii a legitimate government. Therefore, the U.S. government hadn’t acquired any territory in the Hawaiian Islands by any legal means and certainly not by cession.	Thank you for adding this additional context and historical perspective. The Navy and NASA have noted this information, although page limitations prevent us from adding it to the Final EIS.	Land Use and Access
0018	Kaimana K Kinzie		4	It is remarked by Keao NeSmith in Volume 3 Appendices pg. 69 that the Hawaiian Kingdom continues to exist as an independent state, a designation that it has maintained since 1843. Moreover, NeSmith states that the HK is and has been occupied by the U.S. and its proxies since 1893, beginning with the landing of U.S. troops on Hawaiian soil. It is crucial to note, that as there exists no legal acquisition of land in Hawaii by the U.S., then its mere presence in the HK from 1893 till present would constitute a prolonged occupation by the U.S. government and its military. As such, the laws of occupation and international humanitarian law would apply to all HK boundaries and territories as well as its inhabitants. My recommendation to the Navy/NASA as well as the State of Hawaii is to review the above comments and facts more closely to better discern the actual relationship between the HK and the U.S. Furthermore, if in fact occupation of the HK, after exhausting all historical records and accounts to the contrary, is currently taking place by the U.S., then I would strongly suggest compliance to occupational law and international humanitarian law.	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework.	Land Use and Access
0018	Kaimana K Kinzie		5	It is for the reasons previously stated that I object to all alternatives presented in the DEIS until such time that the terminology therein is changed to more accurately represent the status of the lands in question. I suggest removing the term “ceded	Your opposition to all three alternatives is noted. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS	Action Alternatives

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				lands" and replacing it with the term "seized" or "occupied lands". This would more accurately describe the lands in question and more importantly bring into play a different set of regulatory laws designed to deal with the updated terminology. Mahalo for your consideration of these comments, -Kaimana K Kinzie	to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	
0019	Anonymous		1	TESTIMONY REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PMRF AND KOKE'E PARK GEOPHYSICAL OBSERVATORY To the Navy and NASA, I am submitting this testimony to express serious concerns regarding the current Draft Environmental Impact Statement (EIS) for the Proposed United States (U.S.) Navy Pacific Missile Range Facility (PMRF) and the National Aeronautics and Space Administration (NASA) Koke'e Park Geophysical Observatory.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA respect your concerns.	Action Alternatives
0019	Anonymous		2	My primary concern is that this Draft EIS is being presented before the September 2024 PMRF Land-Based Training and Testing Draft Environmental Assessment (EA) has been finalized and published. It is my understanding that the final EA was expected in January 2025. An EA's purpose is to determine if a proposed action will have significant environmental impacts, potentially necessitating a more comprehensive EIS. Proceeding with this PMRF and Koke'e Park Geophysical Observatory EIS without a finalized EA for related training and testing activities that would take place on the leased land is doing things in the wrong order - Out of Sequence.	Your concerns regarding the order of publication of the 2024 Land-Based Training and Testing (LBTT) Draft EA and this EIS are noted. The 2024 PMRF LBTT Draft EA was available prior to the publication of the Draft EIS for this Project. The Final EA for the PMRF LBTT was completed in September 2025, well in advance of the availability of this Final EIS. This Final EIS does refer to information in the 2025 PMRF LBTT Final EA to describe ongoing activities within the Project Area on leasehold and easement lands, and is included in the HEPA (Hawai'i Revised Statutes Chapter 343) cumulative effects analysis in Chapter 4.	Purpose and Need
0019	Anonymous		3	Incomplete Cumulative Impact Assessment The impacts described in this EIS are inappropriately separated from the cumulative impacts of the associated September 2024 EA training activities. These training activities are a substantial part of the overall operations that this EIS aims to support. It is illogical and irresponsible to consider new leases and expanded operations when the actual uses of the PMRF Barking Sands lease land are not yet codified by a final September 2024 PMRF Land-Based Training and Testing EA.	As described in Section 4.1.2 (Introduction to Analysis/Scope and Area of Cumulative Effects Analysis) of the Final EIS, the geographic extent for the cumulative effects analysis includes the same Regions of Influence (ROIs) as the ROIs for the resources in Chapter 3. The ROIs are primarily limited to the leaseholds and easement lands, with the exception of transportation, cultural practices, and socioeconomics. Therefore, only those activities in the PMRF LBTT EA occurring on lands in federal jurisdiction in the ROIs are included in the Final EIS.	Cumulative Effects
0019	Anonymous		4	Unjustified Expansion of Activities In the Training EA the Navy is proposing a significant increase in training and testing activities at PMRF, from 78 to 258 annually. This represents a 231 % increase, or 3.3 times more activities overall, which is a dramatic and significant intensification. Specifically, the proposed increase in annual activities on Ka'ula Island from 26 to 55 is a 112% increase, more than doubling the current number. These are alarming and substantial increases. The September 2024 EA, which proposes expanded military activities at PMRF and Ka'ula Island, does not accurately or adequately assess the impacts that increased bombing of Ka'ula Island and increased military exercises will have on the local environment.	The Navy and NASA respect your concerns related to other EAs and EISs. The PMRF LBTT Final EA was published in September 2025. Ka'ula Island is outside the Project Area and ROI for this EIS, but more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. Any impacts from previous National Environmental Policy Act (NEPA) analysis are outside the jurisdiction and scope of this EIS. In an effort separate from this EIS, the State of Hawai'i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/).	Ongoing Activities
0019	Anonymous		5	Disregard for Ka'ula Island's Ecological and Cultural Significance The designation of Ka'ula Island as "uninhabited" is both inappropriate and factually incorrect, especially when considering the abundant wildlife that lives and relies on it. The assertion that "wildlife species have occurred at PMRF for decades during current training and testing activities, and no adverse affects have been observed" (ES-7) is baseless and absurd. Ka'ula provides crucial seabird habitat, protected from sea-level rise and predatory species, making this claim demonstrably false.	The Navy and NASA respect your concerns related to Ka'ula Island. Because the Proposed Action for this EIS is limited to leaseholds and easement lands, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, but more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. However, recent NEPA documents have analyzed impacts to marine resources around Kaua'i. A list of previous PMRF NEPA documents are presented in Table 1-5 of the Final EIS. PMRF also maintains an up-to-date Integrated Natural Resources Management Plan (INRMP) (Appendix K of the Final EIS). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. State and federal wildlife agencies are involved in updates to this document, and provide guidance and recommendations for management actions set forth in the INRMP.	Biological Resources

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					Ongoing conservation measures and biological resources for Ka'ula Island are addressed in the 2023 PMRF INRMP, located in Appendix K of the Final EIS and available on the EIS website at https://pmrf-kpgo-eis.com/documents. Additionally, as stated in the PMRF LBTT Final EA, the Navy determined Ka'ula Island meets the criteria of a traditional cultural place (TCP) eligible for listing on the National Register of Historic Places and determined that there would be adverse effects to the Ka'ula Island TCP from that project. The Navy is consulting with Native Hawaiian Organizations, the Office of Hawaiian Affairs, State Historic Preservation Division, and other consulting parties for that project; and notified the Advisory Council on Historic Preservation, to resolve adverse effects through a formal agreement under Section 106 of the National Historic Preservation Act.	
0019	Anonymous		6	Furthermore, Ka'ula is a well-known and vital fishing ground for the local community. The current Training EA fails to examine the impacts on local fisheries and potential impacts to traditional fishing and gathering practices. The EA is severely insufficient in assessing the cumulative impacts to Ka'ula Island. Beyond its ecological importance, Ka'ula is a sacred site. It is named in "Ke Lei Maila," one of the most popular oli (chants) used across Hawai'i, is a traditional place to harvest wildlife, and holds profound spiritual significance in the birth of the islands - The Kumulipo which was referenced in the EIS. To subject such a culturally significant site to increased military attack and bombing is an act of desecration.	The Navy and NASA respect your concerns related to other EAs and EISs. The Proposed Action has no potential impact to Ka'ula Island, but more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/.	Cultural Practices
0019	Anonymous		7	Underestimated Ocean Impacts PMRF conducts missile launches from land-based launching pads at Barking Sands, including 35 proposed annual launch activities that will be "intercepted" (exploded) offshore, and 3 live-firing activities that could directly impact ocean ecosystems. The EA inappropriately dismisses these ocean impacts, stating they were analyzed in previous-documents. These prior documents are outdated and, critically, do not account for the proposed increase in activities. This omission is a massive oversight regarding the cumulative effects of military operations in the Hawaiian Islands, as well as the effects of these individual land-based activities. This approach is in direct defiance of regulations defining significance, which state that "significance cannot be avoided by terming an action temporary or by breaking it down into small component parts."	The scope and area of analysis for the PMRF LBTT EA is outside the scope of this EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0019	Anonymous		8	Support for the No Action Alternative While this EIS is commendably well-documented, even referencing the Kumulipo, it remains "the horse before the cart" due to the aforementioned deficiencies. Therefore, the only acceptable action regarding the EIS under discussion today is Alternative 3: No Action Alternative. This alternative would mean the State of Hawai'i would not issue the Navy and NASA any real estate agreements for state lands on Kaua'i after the expiration of the current leases and easements between 2027 and 2030. The existing real estate agreements for 8,172 acres with the Navy and 23 acres with NASA would expire.	The Navy and NASA note your support for the No Action Alternative.	Action Alternatives
0019	Anonymous		9	As stated in the EIS's Cultural Studies (Appendix F, Section 3.3.1.4.1), *"Some Native Hawaiian participants in the CIA interviews and public scoping meetings report feelings of loss and injustice when ceded lands are possessed by non-Hawaiian entities, especially to the U.S. Government whom they accuse of illegally occupying the Hawaiian Islands. For those who feel this way, the No Action Alternative could result in long-term beneficial effects because the ceded lands would be back in possession of the State of Hawai'i and potentially available for use by Native Hawaiians. "*This perspective underscores the profound cultural and historical implications of these land agreements.	The Navy and NASA agree that the Proposed Action could result in cultural and historical implications.	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0019	Anonymous		10	Choosing the No Action Alternative would be a crucial step towards respecting the process of EA and EIS, the environment, cultural heritage, and the well-being of the Kaua'i community.	The Navy and NASA note your support for the No Action Alternative.	Action Alternatives
0020	José Felix-Keamoai	Kekaha Pop Warner Organization	1	I strongly support the proposed alternative #1, where a fair market value to continue a lease agreement with a promise of continuous commitments to protect the environment and wildlife in the area.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. The Navy strives to balance military readiness with environmental protection. PMRF utilizes an up-to-date Integrated Natural Resources Management Plan (Appendix K of the Final EIS), which serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value would be determined in collaboration with relevant parties and shareholders when a final action is carried forward.	General Support
0021	José Felix-Keamoai		1	PMRF-KPGO has been a good and responsible lease holder so far. The employment and business opportunities that are provided are very important to our local communities.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA thank you for your recognition of the Navy and NASA's activities as valuable to the community and local economy. PMRF's economic contributions are discussed in Section 3.6 (Socioeconomics) of the Final EIS. The potential effects from all alternatives are analyzed and compared in Chapter 3 (Affected Environment and Environmental Consequences) of the Final EIS.	Socioeconomics
0022	Cindy Freitas		1	For some reason the email that I have does not work so I'm sending my testimony/comment this way. (email: PMRF-LBT-EA-Comments@us.navy.mil.) Thank you Cindy Freitas July 15, 2025 Cindy Freitas Naval Facilities Engineering Systems Command Pacific/EV22 Attention: PMRF LBT EA Project Manager 258 Makalapa Drive, Suite 100 Pearl Harbor, HI 96860 RE: OPPOSE THE U.S. Navy's proposal draft environmental assessment He Mele komo a he mele aloha no na kupuna o ke au i hala Aloha mai kakou. Aloha, My name is Cindy Freitas and I'm a Native Hawaiian descended of the native inhabitants of Hawai'i prior to 1778 and born and raised in Hawai'i. I am also a practitioner who still practice the cultural traditional customary practices that was instill in me by my grandparents at a young age from mauka (MOUNTAIN TO SEA) to makai in many areas.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process.	Action Alternatives
0022	Cindy Freitas		2	I am writing to **oppose the proposed increase in military training, testing, and bombing exercises at Ka'ula Island** as outlined in the Draft Environmental Assessment (EA) for the Pacific Missile Range Facility. I am especially concerned about the EA's **insufficient treatment of cultural and historical impacts on Ka'ula Island**, a location with deep significance to Native Hawaiians.	Navy and NASA recognize that Native Hawaiians possess place-based indigenous knowledge that is valued and respected. The Navy and NASA respect your concerns related to other EAs and EISs. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on	Action Alternatives

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					Ka‘ula Island were analyzed in the PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS and at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	
0022	Cindy Freitas		3	Although the EA may fulfill minimal legal requirements under the National Environmental Policy Act (NEPA), it **fails to fully acknowledge the cultural, spiritual, and historical importance of Ka‘ula Island.** The assertion that there are “no known historic properties” due to a lack of archaeological remains is not a valid justification for the continuation or expansion of destructive activities.	Please see response provided in comment #2 regarding Ka‘ula Island.	Cultural Practices
0022	Cindy Freitas		4	Ka‘ula Island exists within a living Hawaiian cultural landscape, and it deserves more than a checkbox-style assessment. Native Hawaiian oral traditions, spiritual practices, and ancestral connections to this ‘āina are essential components of cultural significance, and **must be evaluated with full consultation** and respect. This is a requirement under Section 106 of the National Historic Preservation Act (NHPA) and Executive Order 13007 concerning sacred sites.	Please see response provided in comment #2 regarding Ka‘ula Island.	Cultural Practices
0022	Cindy Freitas		5	Moreover, the **restricted military access to Ka‘ula** means Native Hawaiians have been historically denied the opportunity to document, access, or steward this place. This lack of access should not be used as an excuse to claim the island holds no cultural value.	Please see response provided in comment #2 regarding Ka‘ula Island.	Cultural Practices
0022	Cindy Freitas		6	Given the long legacy of military damage to Hawaiian lands—most notably Kaho‘olawe—it is unacceptable to further militarize and desecrate another sacred island. Until the Navy: • Engages in **genuine, good-faith consultation** with Native Hawaiian organizations and cultural practitioners, • Conducts a **culturally competent, independent assessment** of Ka‘ula Island, • And prioritizes cultural preservation over destructive exercises, this proposal should be **withdrawn in its current form**. Mahalo, __/s/___ Cindy Freitas	Please see response #2 regarding Ka‘ula Island. In an effort separate from this EIS, the State of Hawai‘i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai‘i (https://engage.hawaii.gov/). Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) of the Final EIS summarizes the cultural consultation that was conducted with Native Hawaiians about the Proposed Action, and the Cultural Impact Assessment in Appendix F provides more details about those consultations. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS describes the Navy’s coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Enhanced Engagement-4, PMRF Kaua‘i (https://pmrfkauai.com/), will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions. Your support for the withdrawal of the Navy and NASA’s proposal is noted.	Cultural Practices
0023	Kauwila Sheldon		1	Aloha kākou, My name is Kauwila Sheldon. My maternal side comes from the Kaumuali’i lines from Kaua’i and my father’s praternal side comes from parts of Kaua’i. Koke’e is a special wahi pana as well as all of Kaua’i as it is my “mainland” and the source of where my lineage comes from. This Environmental Impact report, I have not seen yet. I would like to request that it be made available. I would like to know the Navy’s activities and it’s impact on our endangered species and marine life.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concern regarding endangered species and marine life that could be affected by operations at PMRF. Table 3.4-2 and Table 3.4-3 of the Final EIS includes Endangered Species Act (ESA)-listed species present or with potential to occur in the Project Area, to include Kōke‘e. Effects to ESA-listed species from the Proposed Action are described in detail by location in Section 3.4.2 (Biological Resources/Environmental Consequences) in the	Biological Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					Final EIS. The Navy strives to balance military readiness with environmental protection. As such, PMRF has an Integrated Natural Resources Management Plan (INRMP) that is updated regularly and implements a comprehensive plan for natural resource conservation and management. The 2023 PMRF INRMP can be found on the EIS website at www.pmrf-kpgo-eis.com and in Appendix K of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0023	Kauwila Sheldon		2	I would also like to know how the Navy stores their fuel tanks. The Navy has a bad reputation of leaving chemicals, weapons, ordinances and pollution in our islands. I oppose any further leases and military activities being done by the Navy on Kaua'i. I think the Navy is dangerous and poses a threat to our environment and wahi pana. Mahalo, Kauwila Sheldon Sent from my iPhone	All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. All aboveground storage tanks are equipped with a secondary containment device (i.e., steel basin, double-walled steel tank) and all underground storage tanks are equipped with advanced leak detection systems. Risk assessments are conducted for all storage tanks at PMRF by a third-party environmental engineering firm every 2 years. Per State of Hawai'i Department of Health regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all underground storage tanks. Please see Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS for more information. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS.	Hazardous Materials and Waste
0024	Cindy Freitas		1	Aloha, Mahalo Cindy Freitas July 15, 2025 Cindy Freitas Naval Facilities Engineering Systems Command Pacific/EV22 Attention: PMRF LBT EA Project Manager 258 Makalapa Drive, Suite 100 Pearl Harbor, HI 96860 RE: OPPOSE THE U.S. Navy's proposal draft environmental assessment He Mele komo a he mele aloha no na kupuna o ke au i hala Aloha mai kakou. Aloha, My name is Cindy Freitas and I'm a Native Hawaiian descended of the native inhabitants of Hawai'i prior to 1778 and born and raised in Hawai'i. I am also a practitioner who still practice the cultural traditional customary practices that was instill in me by my grandparents at a young age from mauka (MOUNTAIN TO SEA) to makai in many areas.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process.	Action Alternatives
0024	Cindy Freitas		2	I am writing to **oppose the proposed increase in military training, testing, and bombing exercises at Ka'ula Island** as outlined in the Draft Environmental Assessment (EA) for the Pacific Missile Range Facility. I am especially concerned	Navy and NASA recognize that Native Hawaiians possess place-based indigenous knowledge that is valued and respected. The Navy and NASA respect your concerns related to other EAs and EISs. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee	Action Alternatives

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				about the EA's **insufficient treatment of cultural and historical impacts** on Ka'ula Island, a location with deep significance to Native Hawaiians.	simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	
0024	Cindy Freitas		3	Although the EA may fulfill minimal legal requirements under the National Environmental Policy Act (NEPA), it **fails to fully acknowledge the cultural, spiritual, and historical importance of Ka'ula Island.** The assertion that there are "no known historic properties" due to a lack of archaeological remains is not a valid justification for the continuation or expansion of destructive activities.	Please see response provided in comment #2 regarding Ka'ula Island.	Cultural Practices
0024	Cindy Freitas		4	Ka'ula Island exists within a living Hawaiian cultural landscape, and it deserves more than a checkbox-style assessment. Native Hawaiian oral traditions, spiritual practices, and ancestral connections to this 'āina are essential components of cultural significance, and **must be evaluated with full consultation** and respect. This is a requirement under Section 106 of the National Historic Preservation Act (NHPA) and Executive Order 13007 concerning sacred sites.	Please see response provided in comment #2 regarding Ka'ula Island.	Cultural Practices
0024	Cindy Freitas		5	Moreover, the **restricted military access to Ka'ula** means Native Hawaiians have been historically denied the opportunity to document, access, or steward this place. This lack of access should not be used as an excuse to claim the island holds no cultural value.	Please see response provided in comment #2 regarding Ka'ula Island.	Cultural Practices
0024	Cindy Freitas		6	Given the long legacy of military damage to Hawaiian lands—most notably Kaho'olawe—it is unacceptable to further militarize and desecrate another sacred island. Until the Navy: • Engages in **genuine, good-faith consultation** with Native Hawaiian organizations and cultural practitioners, • Conducts a **culturally competent, independent assessment** of Ka'ula Island, • And prioritizes cultural preservation over destructive exercises, this proposal should be **withdrawn in its current form**. Mahalo, __/s/___ Cindy Freitas	Please see response provided in comment #2 regarding Ka'ula Island. In an effort separate from this EIS, the State of Hawai'i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/). Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) of the Final EIS summarizes the cultural consultation that was conducted with Native Hawaiians about the Proposed Action, and the Cultural Impact Assessment found in Appendix F of the Final EIS provides more details about those consultations. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Enhanced Engagement-4, PMRF Kaua'i (https://pmrfkauai.com/), will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions. Your support for the withdrawal of the Navy and NASA's proposal is noted.	Cultural Practices
0025	Daynette (Dee) Morikawa	Hawaii State House of Representatives	1	PMRF is a vital part of Kauai and especially West Kauai. I have represented South/West Kauai and Niihau for 15 years. PMRF has shown how they see cultural and natural resources preservation as an important part of community concerns. Their efforts have proven that they truly care about the environment and our people through many community service programs. They are a tremendous support to our	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy and NASA's activities as valuable to the community and the land. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS contains more information about community outreach done by PMRF. PMRF	General Support

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				economy and provide future generations with innovative career choices. I am committed to work with them to further support community concerns and to assure that their existence on Kauai continues.	participates in many community outreach programs, such as the educational Science, Technology, Engineering, and Mathematics event for local elementary students and Girl Scouts. Please be sure to sign up for the new PMRF Kaua'i quarterly newsletter on https://pmrfkauai.com/ (Enhanced Engagement-4).	
0026	Doris Jaynes		1	We are all aware that our Government has not had a history of responsibility in caring for the property on which we house our Army, Navy or Air Force personnel or projects so you have a fight ahead and we know we need you but we hope that our Government agencies will take great concern in the manner in which they manage our lands especially here in Hawaii . All the peoples of these islands have great love of the 'AINA". We are grateful for your presence and only ask that you respect our land and our citizens. Take Great Care. Mahalo, Doris Jaynes, Kauai	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy and NASA's activities as valuable to the community and the land. The Navy and NASA recognize the importance of the 'āina. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. The Navy strives to balance military readiness with environmental protection. As discussed in Sections 3.4 (Biological Resources) and 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF would continue to provide long-term resource protection through the use of their Integrated Natural Resources Management Plan and Integrated Cultural Resources Management Plan. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Enhanced Engagement-4, PMRF Kaua'i (https://pmrfkauai.com/), will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions.	Cultural Practices
0027	Stephenie Blakemore		1	Please send me an email that provides a mailing address to send my EIS input. What I heard tonight was poweful truth..any one speaker from yhe community supports this. That was powerful truth.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA responded to this e-mail request on July 18, 2025, stating that comments on the EIS should be submitted to the same email address (info@pmrf-kpgo-eis.com). This comment process was described several times throughout the public meetings.	EIS Process
0028	Terrill James Kane Alii Williams		1	Please see the attachment in this email regarding my comments for: Draft Environmental Impact Statement for the Proposed United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Kōke'e Park Geophysical Observatory Real Estate, Kaua'i, Hawai'i; Tax Map Keys: 4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.) Mahalo, Terrill James Kane Alii Williams, MBA Ohana of Papapa of Niihau Heir to Royal Patent 1615 to PAPAPA	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process.	Action Alternatives
0028	Terrill James Kane Alii Williams		2	July 17, 2025 Terrill James Kane Alii Williams, MBA Pacific Missile Range Facility United States Department of the Navy Email: info@PMRF-KPGO-EIS.com	Your opposition to the Proposed Action is noted.	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Formal Notice Regarding --- Draft Environmental Impact Statement for the Proposed United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Kōke'e Park Geophysical Observatory Real Estate, Kaua'i, Hawai'i; Tax Map Keys: 4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.): I am providing comments in opposition to the current Draft Environment Impact Statement (DEIS) by the Pacific Missile Range Facility (PMRF).		
0028	Terrill James Kane Alii Williams		3	Although the DEIS pertains to renewal of its lease for lands on Kauai, it does not provide a comprehensive layout of all operations that are consequences of that lease, including in the ocean which the PMRF borders [Exhibit 1]. There needs to be information explicitly identifying PMRF's nautical boundaries. Considering that PMRF currently is located on the shores boarding the Kaulakahi Channel, a traditional migratory channel between the Kauai and Niihau that my ancestors used, there needs to be more information regarding impact on the Kaulakahi Channel, including the surrounding water of the island of Niihau and Native Hawaiian traditional and customary practices.	As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes (HRS) Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. Additionally, the Navy and NASA are "applicants" in the HRS Chapter 343 EIS process and, as such, have proposed the Project as described in Chapter 2 of the Final EIS. The scope of the Project as defined by the applicants is defined by the area for which the applicants seek real estate agreements with the State of Hawai'i Board of Land and Natural Resources. The Project in the Final EIS is defined in Chapter 2 consistent with HAR section 11-200.1-2, which defines Project as the "discrete, planned undertaking that is site and time specific, has a specific goal or purpose, and has potential impact to the environment." As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0028	Terrill James Kane Alii Williams		4	The Ka Paakai Analysis is incomplete. The Hawaii State Aha Moku, housed within the State of Hawaii Department of Land and Natural Resources (DLNR), must also be consulted. The lineal descendants of the island of Niihau must also be consulted. Furthermore, representatives of the Robinson family do not speak on behalf of all the lineal descendants of Niihau nor are the 'green light' for all decisions or dealings with PMRF impacting Niihau. As previously made known to PMRF, I am a lineal descent of the Kapalehua ohana of Niihau (different from the Kapahulehua ohana of Niihau) and through the Kapalehua ohana, I am within the ohana of Papapa of Niihau. This was provided to PMRF via my genealogy affidavit [Exhibit 2] that includes evidence of my heirship to the lands identified in Royal Patent 1615 to PAPAPA --- that are also stipulated in Royal Patent 2944 to JAMES SINCLAIR --- and Survey Notes to Royal Patent 1615 to PAPAPA & OTHERS on Niihau that were submitted as part of my comments on the recent Draft Environmental Assessment concerning Kaula sent via email on September 27, 2024. Additionally through PMRF's processeses concerning Kaula, PMRF has provided several receipts acknowledging me as "Ohana of Papapa of	Consultation with the State Aha Moku and other government agencies is described in Public and Agency Participation and Intergovernmental Coordination (Section 1.7.4, Intergovernmental Coordination and Section 1.7.5, Ongoing Community Coordination) of the Final EIS. The Proposed Action has no potential impact to Ni'ihau. Cultural Practices (Section 3.3.2, Environmental Consequences) of the Final EIS lists the people who shared information with the Navy and NASA about cultural resources and practices in the Project Area. More details of the consultations are available in the Cultural Impacts Assessment report found in Appendix F, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS.	Cultural Practices

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				Niihau", including in the 11000, Ser N4F/0126, LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA'I, HAWAI'I (HICRIS Project No. 2024PR01077) dated February 26, 2025 [Exhibit 3] as well as the 11000, Ser N4F/0370 SUBJECT: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA'I, HAWAI'I (HICRIS Project No. 2024PR01077) dated June 04, 2025 [Exhibit 4]; these communications were sent by PMRF to the DLNR via email.		
0028	Terrill James Kane Alii Williams		5	At no point was I contacted regarding this DEIS, its impacts on the Kaulakahi Channel, its impacts to the surrounding waters of Niihau, its impacts to the island of Niihau, or its impacts to the people of Niihau; my comments here do not constitute consultation. I do not consent to members of the Robsinon family speaking on my behalf and as such, I expect to be directly contacted by PMRF regarding this matter moving forward. Furthermore, PMRF needs to begin the process of cleanup as well as begin the process of having the lands on Kauai detailed in the lease to be registered as Traditional Cultural Property.	The Navy and NASA respect your concerns related to other EAs and EISs. However, effects at Ni'ihau Island and in the Kaulakahi Channel are outside the jurisdiction and scope of this EIS. In an effort separate from this EIS, the State of Hawai'i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/). Effects to marine resources from the Navy's offshore ongoing activities were analyzed in previous PMRF environmental review documents and are presented in Table 1-5 of the Final EIS and discussed in detail in the 2025 HCTT Final EIS/OEIS. This document is publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents. PMRF is preparing a Traditional Cultural Places (TCP) study and anticipates completing in 2026; the mana'o you shared during consultation for the TCP study is appreciated.	Cultural Practices
0029	Mai Hall		1	Aloha I am writing to express my strong opposition to the U.S. Navy's proposed retention of leased lands at Pacific Missile Range Facility. As a spouse of an active duty Airman, and a Native Hawaiian, my needs as a Hawaiian must come first. He Hawaii au, mau a mau. I am Hawaiian now and forever. I cannot sit by and allow the military to keep desecrating Hawaiian lands. Look what the Navy did to Kahoolawe. The Army has many other lands to train at and to practice its amphibious warfare and bombing. Better yet, you can train in California where there is lots of land to destroy.	The Navy and NASA thank you for your comments, appreciate your participation in the EIS process, and note your opposition to the Proposed Action. The Navy and NASA respect your concerns related to other military installations. However, impacts at Kaho'olawe are outside the scope of this EIS. In an effort separate from this EIS, the State of Hawai'i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/).	General Opposition
0029	Mai Hall		2	Additionally, the military training activities of this scale are simply not compatible with the intention of conservation, upholding cultural integrity, and aloha 'āina. Enough is enough.	The Navy strives to balance military readiness with environmental and long-term cultural resource protection. As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS also describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0029	Mai Hall		3	The military population is unsustainable in Hawaii. Hawaiians have always been a sustainable people. We care for our lands and clean up our messes. Give us back our lands and we will clean it up the way it should be. To nourish our people, and so our legacy may live on. I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by giving back this land to Hawaiians. Do what is pono, what is just and right. Mahalo. Sincerely, Mai Kapuaoihilani Mei Lin Hall 'Aliapa'akai, Kona, O'ahu E malama pono, Mai K. Hall "'A'ohe pau ka `ike i ka halau ho`okahi" ~Not all knowledge is learned in the same place ~ One can learn from many sources	The Navy and NASA note your opposition to the Proposed Action. Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) of the Final EIS includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation. The Navy strives to provide long-term resource protection, and works with neighboring communities to respond to requests for cleanup. For example, in late 2022, the Department of Hawaiian Home Lands identified debris from an almost 60-year old missile on DHHL lands in Niu Valley, Kaua'i. After discovery, PMRF organized an immediate Explosive Ordnance Disposal response, and determined that there was no immediate threat to the public or the environment, and began removal planning. In 2024, the PMRF Public Works and Stewardship office partnered with a local business and volunteers to clear approximately 2,300 pounds of debris from the site, and all recyclable debris was disposed of properly at a recycling center in Līhu'e. This removal effort will allow for more effective land use for DHHL and demonstrates the Navy's commitment to response and recovery of military debris.	Cultural Practices
0030	Clarence Estes		1	I am totally in APPROVAL of the U.S. NAVY PACIFIC MISSILE RANGE FACILITY to continue their mission and to occupy the lands required for its operations. This base has some of Hawaii's most pristine beaches and the lands free of soil contamination & waste. Their contribution to our National Defense is paramount!	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. As described in Section 3.4 (Biological Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, completes required actions, and obtains resources necessary to protect and manage the natural resources on the installation.	General Support
0031	Stephenie Blakemore		1	No to this renewal plan. I realize the Pacific is a vulnerable place strategically. I am thinking particularly of China in the Pacific, which is a growing threat to many countries, including the USA. However poor stewardship of the land resulting in depleted wetlands and ocean environments which threaten rare and indigenous species, as well as the impact the environmental disregard has on cultural practices needs to be correctedin a big way. Missle firing, war games: these cannot be an option anymore. Being prepared is one thing, but what we are defending cannot be destroyed in the name of being prepared. Much of the economic impact to workers can be done with sound environmental and cultural awareness and respect. Thank you for holding these hearings	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all National Environmental Policy Act (NEPA)/Hawai'i Environmental Policy Act/HEPA (Hawai'i Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy strives to balance military readiness with environmental and long-term cultural resource protection. As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date INRMP Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions.	Biological Resources

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					The Navy and NASA are presenting Enhanced Engagements in the Final EIS; these are discussed in Chapter 5 and listed in Table 5.2-1. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0032	Richard Gioscia		1	SEE ATTACHMENT FOR EIS OMISSION ON TRANSPORTATION IMPACT	The Navy and NASA appreciate your participation in the EIS process. The Navy and NASA appreciate you resubmitting your comment following your initial submittal, see comment letter #14. Thank you for providing an attachment.	Transportation
0032	Richard Gioscia		2	Comments on Draft EIS Statement Regarding Transportation Richard Gioscia Kekaha, HI Please note the following: • Personnel, contractors and vendors impact the volume of traffic on Kaumuali'I Hwy. in Kekaha. I estimate that there are more than 4000 one way trips through Kekaha each day, Monday through Friday due to base operations. • Both KPD and HDOT have documented that the average speed on the highway is over 43 mph in a 35 mph zone. • I have personally had vehicles leaving the base pass me in the 50 mph zone prior to the State park at speeds in excess of 65 mph. • The Draft EIS does not address the safety risks due to the volume of traffic and the lack of speed mitigation measures on Kaumuali'I Hwy. There are pedestrians, cyclists and local traffic to whom this traffic poses a danger. The final EIS should include the requirement for traffic calming measures and a reduction in the speed limit to 25 mph on Kaumual'I Hwy in Kekaha. It is unacceptable and a serious omission that the Draft EIS is silent on this issue.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Potential effects to transportation networks are described in Section 3.11.2 (Transportation/Environmental Consequences) of the Final EIS. Changes to speed limits on Kaumualiʻi Highway are outside the scope of this EIS and NASA or Navy's jurisdiction. The Navy and NASA suggest contacting Kauaʻi government officials to voice concerns regarding speed limits on public roads.	Transportation
0033	Greg Halzman		1	My concern is for the septic water systems associated with guest cottages + housing and planned developments near our beaches and how these sandy dunes are being managed for effluents with increased development of the coast on PMRF. What is the plan to monitor and improve our clean waters including runoffs	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The beach cottages at PMRF are located on fee simple land, and are therefore not discussed in the Final EIS. The Navy has partnered with the State of Hawaiʻi Agribusiness Development Corporation (ADC) to conduct surface water quality monitoring throughout the Mānā Plain, with a particular focus on the agricultural ditches that help direct stormwater runoff to ocean outfalls. Two pump stations, the Nohili and Kawaiʻele Pump stations, located on leasehold lands at Main Base, have historically been used to lift water from the lower-lying portions of the Mānā Plain over the coastal dunes (shown in Figure 3.7-4 of the Final EIS). When in use, these pumps utilize pollution control measures such as the use of polyvinyl chloride screens to trap drifting debris and subsurface pipes that prevent discharge of floating debris or oily substances. Table 3.7-2 in the Final EIS outlines the Best Management Practices and Standard Operating Procedures that are utilized in water resource management on leasehold and	Water Resources

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					easement lands, including the management of surface water quality. If you are interested in learning more about the Mānā Plain water quality monitoring program, or would like to see test results, all ADC Mānā Plain water quality monitoring data since September 2020 is publicly available on the ADC website (https://dbedt.hawaii.gov/adc/manaplain/). A National Pollutant Discharge Elimination System permit has also been issued to cover discharge points from the Mānā Plain drainage system. Permittees are listed as ADC and County of Kaua'i. The permit requires ADC to initiate other comprehensive measures to ensure long-term environmental compliance with environmental laws and regulations. More details on the final permit are discussed in Section 3.7.1.4.2.6 (Water Resources/Surface Water Quality). The final permit is available on the Hawai'i Department of Health website at https://health.hawaii.gov/cwb/final-individual-permits/. Finally, the Navy and NASA are developing Enhanced Engagements that will add to the existing protections at PMRF and KPGO. Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-5 includes the establishment of a Navy-Department of Land and Natural Resources-Department of Hawaiian Home Lands-Kekaha Agricultural Association-ADC-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i.	
0034	Dennis Eguchi		1	#3 employer on the island Very strategic projects for our safety PMRF works well with the community and the island Helps with my piece of mind knowing what is being test at PMRF for my family's safety Very involved with the community both physically and monetarily We should have the state just grandfather their lease	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Thank you for recognizing the safety, economic, and community benefits provided by PMRF. As described in the Final EIS in Chapter 2, under the Proposed Action the terms of new real estate agreements would be negotiated between Navy, NASA, and the State.	General Support
0035	Jose San Agustin Jr		1	Open complete runway excess from the 3rd wind sock south to the red gate on the north those areas have been closed for a long time fishing is great in those areas, you have 3 types of security on the base and security cameras including night vision (illegible) thermo capabilities I feel if you open it up the west side would be pleased at least the hunter gatherers.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your recommendation regarding increasing access to PMRF for recreational activities. Access to Department of Defense (DoD) installations and other related facilities are controlled under DoD Manual 5200.08, *Volume 3 Physical Security Program: Access to DoD Installations*. Limited access to DoD installations ensures operational security and public safety. As discussed in Section 3.5.1.6.1 (Land Use and Access/Main Base) of the Final EIS, access is controlled at PMRF for Force Protection Condition status, public safety during range operations, and for the protection of threatened and endangered natural resources. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Land Use and Access
0036	Kaimana Castanada		1	Consider other uses that assist in housing for the local population and housing recommend the following: parcels 15 acres + smaller, median income $200,000 + less, 5 yr resident.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your recommendation regarding other uses for the leasehold and easement lands.	Socioeconomics

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					As described in Chapter 2 (Proposed Action and Alternatives) of the Final EIS, Alternatives 1 and 2 would not change any use or maintenance of existing infrastructure and would not involve construction, renovation, or demolition of facilities.	
0036	Kaimana Castanada		2	Research other historical sites such as Mana Internment Camp as well as cultural.	Waimea Jail, Līhuʻe Plantation Gym, Kalaheo Stockade, Kauaʻi Courthouse in Līhuʻe, and Wailua County Jail are the documented internment sites on Kauaʻi. If another site at Mānā was used, PMRF would be interested in hearing from people who know about it.	Archaeological and Architectural Resources
0036	Kaimana Castanada		3	Research opportunity to use 7 capped wells in Mana marshland.	Thank you for this information. Other wells located within the Mānā Plain are not analyzed in this EIS as they are managed by Department of Land and Natural Resources and/or State of Hawaiʻi Agribusiness Development Corporation.	Water Resources
0037	Mervin Chung		1	Follow the laws re occupation! I say no to any EIS by the U.S. military. First they have no rights internationally to be here. No treaty of peace of annexation to claim any right to be here. The U.S. military is the largest pollutane on the planet. To say they can past any EIS is a joke. U.S. military just allowed jet fuel to leak and didnt want to fix the problem. In addition their operation in Pohakuloa will not be cleaned after they leave. How is that proper protocol for any land that they use. The U.S. military is not a good land user here in Hawaiʻi.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill and Pōhakuloa are outside the jurisdiction and scope of this EIS. In an effort separate from this EIS, the State of Hawaiʻi published a new website in September 2025 to provide the public more access to information about military land leases in Hawaiʻi (https://engage.hawaii.gov/). The Navy strives to balance military readiness with environmental protection. Section 2.5 (Best Management Practices) of the Final EIS includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS.	Action Alternatives
0038	Tom Clements		1	Please continue to lease land at PMRF. The Navy and fellow team of contractors, UH and government representatives have shown to be good stewards of natural and cultural resources while also performing vital support to military and scientific ventures Mahalo	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy and NASA's activities as valuable to the community and the land.	General Support
0039	Russell Tsuji		1	Sir/Madam: The Hawaii Environmental Policy Act ("HEPA") requires a disclosure of all cumulative impacts together with studies of those impacts and alternative mitigation measures.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Consistent with Hawaiʻi Administrative Rules section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4. Section 4.1.5 (Introduction to Analysis/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified.	Cumulative Effects
0039	Russell Tsuji		2	I understand the marine training that is occurring in the ocean involves the firing of anti-ballistic missiles from below the surface of the ocean (from submarines) and at surface (from ships or boats) aimed at targets fired from the Pacific Missile Range Facility at Barking Sands. Because the Navy's continued use of the leased lands is essential to the marine training, the EIS for the continued use of the fast lands leased at Barking Sands should have included a disclosure of the impacts to marine biota	As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-	Ongoing Activities

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				(whether animal, plant or other living organisms), studies of those impacts, and alternative mitigation measures.	sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0039	Russell Tsuji		3	Because the Navy/NASA's DEIS fails to disclose and address the impacts to marine life, the DEIS should be withdrawn or rejected. Respectfully submitted, Russell Y. Tsuji	Please see response to comment #2 for information regarding effects to marine resources.	Biological Resources
0040	Jennifer Kaui Young	Ka Lāhui Hawai'i	1	Written Comment on the 2025 Draft Environmental Impact Statement Pacific Missile Range Facility (PMRF), Mānā, Kaua'i Submitted by: Jennifer Kaui Young Affiliation (if any): Ka Lāhui Hawai'i Date: July 20, 2025 To Whom It May Concern, I submit this testimony in direct response to the 2025 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Navy and NASA regarding activities at the Pacific Missile Range Facility (PMRF) in Mānā, Kaua'i. I find it incomplete, inadequate, and deeply flawed in both legal standing and cultural impact analysis. The proposed actions must be halted, and the DEIS withdrawn or significantly revised.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to the analysis. The Navy and NASA note your opposition to the Proposed Action. Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the Cultural Impact Assessment (CIA). Appendix F contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment.	General Opposition
0040	Jennifer Kaui Young	Ka Lāhui Hawai'i	2	1. Legal Status of the Lands – Seized, Not Ceded The DEIS repeatedly refers to the subject lands as "ceded." This classification is factually and legally false. These lands were seized—without consent or lawful treaty of annexation—and remain under illegal military control. The Hawaiian Kingdom was recognized as a sovereign nation by the U.S. and many other countries, and no lawful transfer of its national lands has ever occurred. Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S.Constitution's recognition of treaties as the supreme law of the land (Article VI).	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0040	Jennifer Kaui Young	Ka Lāhui Hawai'i	3	2. Failure to Adequately Document or Disclose Pollution Events The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with verifiable, public-facing documentation: • Perchlorate contamination from solid rocket fuel used in missile launches and related propulsion testing. • PFAS contamination, especially in light of the known airplane fire incident at PMRF in 2020 (source: Honolulu Civil Beat, "Toxic Foam from Military Fire Training Raises Concerns on Kaua'i," 2021). • The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials. Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?	The Final EIS discloses information on perchlorate testing at PMRF in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well). Although propulsion testing is outside the scope of this EIS, the Navy and NASA have provided a link below to a publicly available paper published by the U.S. Environmental Protection Agency (EPA), which found that perchlorate does not accumulate in soil or water, and that there were no significant differences in perchlorate concentrations in soil samples at testing ranges before or after firing missiles. This information can also be found in the 2025 Hawaii-California Training and Testing (HCTT) Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) in Section 3.2 of that document. An online, pdf version of the paper published by the EPA can be found online at https://semspub.epa.gov/work/HQ/159615.pdf. Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary	Hazardous Materials and Waste

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					updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the EPA screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a Remedial Investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the Hawai'i Department of Health during the remedial investigation process. Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold, and easement lands at PMRF. As discussed in Public Health and Safety (Section 3.9.1.4.4, Mākaha Ridge), a survey was conducted in 2020 to perform safety inspections on the hazards of electromagnetic radiation to personnel from radar operations. PMRF was granted a certification of compliance, and the survey found that PMRF was routinely implementing appropriate hazardous control measures. Due to these safety measures, the public is not exposed to any hazardous radiation. Effects from aerial and underwater testing are not included in the Proposed Action analyzed by this EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0040	Jennifer Kaui Young	Ka Lāhui Hawai'i	4	3. Inadequate Cultural Impact Assessment The cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including: • Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades. • Leina a ka ʻuhane (leaping places of the soul), which are located in proximity to PMRF training zones. • Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access. • Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity. Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "paʻakai analysis" (as required under Hawaiʻi's environmental review framework) cannot be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.	Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the CIA. Appendix F contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment. All of the topics listed in this comment were discussed by CIA interview participants and are addressed in both the CIA and where appropriate to the Proposed Action, summarized in the Final EIS.	Cultural Practices
0040	Jennifer Kaui Young	Ka Lāhui Hawai'i	5	4. Incomplete and Inadequate Analysis – Environmental and Procedural Deficiencies This DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include: • No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors.	As described in Chapter 3 (Affected Environment and Environmental Consequences) of the Final EIS, the approach to analysis in this EIS, as with all National Environmental Policy Act (NEPA)/HEPA (Hawai'i Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the	Socioeconomics

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				• No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region. • No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities—especially children—living near military activity zones. • No generational impact assessment on future health, land use, or cultural restoration. This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory.	associated management activities for the action alternatives in Chapter 3 (Affected Environment and Environmental Consequences) of the Final EIS. Consistent with Hawai'i Administrative Rules (HAR) section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4. Section 4.1.5 (Introduction to Analysis/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified. Cultural Practices (Section 3.3.2, Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the CIA report found in Appendix F, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. Executive Orders 12898 and 14096 (which included a whole-of-government approach to Environmental Justice) were revoked on January 21, 2025; however, see Cultural Practices (Section 3.3), Socioeconomics (Section 3.6), and Land Use and Access (Section 3.5) for relevant analyses in the Final EIS.	
0040	Jennifer Kaui Young	Ka Lāhui Hawai'i	6	5. Conclusion and Demands This land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestors. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us—it harms us, visibly and invisibly. The Navy and NASA must: 1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures. 2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments. 3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners. 4. Acknowledge the land as Hawaiian national land seized without consent, and stop referring to it as "ceded." 5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established. Mahalo for your time. Know that this testimony is not only for today, but for the next seven generations. Jennifer Kaui Young losalioj@hawaii.edu Moku O Keawe	1. As stated in Project Introduction and Overview (Section 1.1) of the Final EIS, the EIS has been prepared consistent with HAR Chapter 11-200.1, the rules implementing HRS Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. It has also been prepared in accordance with the following: NEPA (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. 2. Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. Please see response to comment #3 which addresses your concerns regarding PFAS and perchlorate. 3. Cultural Practices (Section 3.3) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and associate impacts, in the Project Area. More details are available in the CIA report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments and additional interviews have been incorporated into the Final EIS. 4. The Final EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. This history refers to the Apology Resolution of 1993. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is	Land Use and Access

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					used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. 5. As stated in Project Introduction and Overview (Section 1.1) of the Final EIS, "Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Scope of Environmental Analysis (Section 1.5)."	
0041	Cori China	Hawaii State Department of Education	1	Good morning, Please refer to the attached letter for comments from the Hawaii State Department of Education regarding the subject matter. Thank you. Best regards, Cori China Hawaii State Department of Education Office of Facilities and Operations Facilities Development Branch, Planning Section 3633 Waialae Avenue, Room C209 Honolulu, HI 96816 Phone: (808) 784-5080 July 22, 2025 Ms. Kerry Wells PMRF and KPGO RE EIS Manager Naval Facilities Engineering Systems Command Hawaii Environmental OPHEV2 400 Marshall Road, Building X-11 Pearl Harbor, HI 96860 Re: United States Navy Pacific Missile Range Facility and NASA Kokee Park Geophysical Observatory Real Estate Draft Environmental Impact Statement Dear Ms. Wells: Thank you for your letter dated June 18, 2025. The Hawaii State Department of Education provided comments on June 7, 2024, and has no additional comments. Should you have any questions, please contact Cori China, School Lands and Facilities Specialist of the Facilities Development Branch, Planning Section, at (808) 784-5080 or via email at cori.china@k12.hi.us. We appreciate the opportunity to comment. Sincerely, Roy Ikeda Acting Public Works Manager Planning Section RI:cc c: Facilities Development Branch	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	EIS Process
0042	Anna Barbeau		1	Grievances began with Ka'aholawe, Maui and Red Hill, O'ahu. The continuation of the military squatting on and abusing ancestral land on Kau'ai must be terminated. Navy spokespersons state harmful PFCs in the environment have not been proven, yet common sense is in favor of PREVENTION, not 'oops, sorry' later.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Perfluorocarbons have not been identified at PMRF. The Final EIS includes a discussion on the Navy's adherence to applicable State and federal regulations regarding the disposal of hazardous or toxic wastes in Hazardous Materials and Waste (Section 3.12) of the Final EIS The Navy strives to balance military readiness with environmental and long-term natural and cultural resource protection. As discussed in Biological Resources (Section	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					3.4) and Archaeological and Architectural Resources (Section 3.2) of the Final EIS, PMRF would continue to provide long-term resource protection through the use of their Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions. Additionally, please see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS. The Navy is proposing to develop a process to streamline access to traditional lands through development of a PMRF Access Management Plan that balances public access and PMRF's mission requirements. The Navy and NASA respect your concerns related to other military installations. However, impacts at Kahoʻolawe and Red Hill are outside the jurisdiction and scope of this EIS. In an effort separate from this EIS, the State of Hawaiʻi published a new website in September 2025 to provide the public more access to information about military land leases in Hawaiʻi (https://engage.hawaii.gov/).	
0042	Anna Barbeau		2	Navy illegally disturbs iwi on Hawaiian land and denies access for hunter gatherer purposes. Abuse of the land they leave ruin where they practice 'war GAMES'. It is a sickening display of aggression.	Navy and NASA follow applicable federal law (National Historic Preservation Act and Native American Graves Protection and Repatriation Act [NAGPRA]) and State law (Hawaiʻi Revised Statutes Chapter 6E-8) for all projects located in the project area. The Navy's Integrated Cultural Resources Management Plan includes best management practices and standard operating procedures (SOPs), including SOP #7 that requires the Navy to identify impacts to iwi and historic properties and to resolve those impacts by avoiding, minimizing, or mitigating them before an action can proceed. SOP #10 is the Navy's plan regarding iwi if they are inadvertently discovered during any activity at PMRF, military or civilian, whether they are caused by human activities or natural processes. In 2011, the Navy and Na ʻOhana Papa o Mana executed a NAGPRA Comprehensive Agreement (CA) to address all federal agency land management activities that could result in the intentional excavation or inadvertent discovery of NAGPRA items. The CA documents the process for carrying out the requirements of 43 CFR 10, Subpart B for standard consultation procedures, determination of custody, treatment, and disposition of NAGPRA items.	Cultural Practices
0042	Anna Barbeau		3	Sonar disrupts audio within the natural breeding grounds of marine life of ocean mammals who were here long before humans. To arrogantly bully the peaceful residents and continue to destroy this environment is a crude form of greed via control. The military must not be allowed free access any longer. It is time for them to find other options, perhaps digitally they can platy/practice as much as they need without the continued harm of living beings.	As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects from sonar to marine resources, including marine mammals, from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources
0043	D. Green, C. Burghardt		1	Respectfully submitting comments regarding the Navy's Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory. The Navy's DEIS is **incomplete** and **insufficient** for the following reasons: It **fails to fully disclose and mitigate impacts to endangered and native species**, including honu, monk seals, and native plants, from military activities, violating Hawaiʻi Revised Statutes (HRS) §195D (Endangered Species Law).	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Information on, and effects from the Proposed Action to, endangered and threatened species, including sea turtles, monk seals, as well as native plant species are described in detail by location in Biological Resources (Section 3.4.2, Environmental Consequences) in the Final EIS. The Navy and NASA comply with federal, State, and local regulations at PMRF and KPGO as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS.	Biological Resources

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0043	D. Green, C. Burghardt		2	It **lacks an enforceable plan and timeline for remediating decades-old PFAS contamination in soil and groundwater**, contrary to HRS §342L (Hazardous Substance Release and Response Law) and public health protections.	The Navy and NASA note your concern in regard to remediation at the former firefighting training site. Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health and U.S. Fish and Wildlife Service (USFWS) through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency (EPA) screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The Remedial Investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the State of Hawai'i Department of Health during the remedial investigation process.	Hazardous Materials and Waste
0043	D. Green, C. Burghardt		3	**Cleanup responsibilities** for hazardous waste, unexploded ordnance, and abandoned structures after lease expiration **remain undefined and uncommitted**, in violation of Hawai'i Administrative Rules (HAR) §11-200.1-24(q), which requires disclosure and mitigation of unresolved environmental hazards.	Cleanup, and details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. As noted in response to comment #2, the Hawai'i Department of Health and USFWS have been informed of activities at the PFAS site, and the Navy is moving forward to continue next steps of cleanup.	Hazardous Materials and Waste
0043	D. Green, C. Burghardt		4	There is **no recent soil or groundwater testing or adequate risk assessment for large fuel storage tanks**, especially in light of the Red Hill fuel disaster, resulting in potential violations of the Clean Water Act (33 U.S.C. §§1251 et seq.) and HRS §342D (Water Pollution Control).	As discussed in more detail in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS, per State of Hawai'i regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all underground storage tanks. All aboveground storage tanks are equipped with a secondary containment device (i.e., steel basin, double-walled steel tank) and all underground storage tanks are equipped with advanced leak detection systems. Risk assessments are conducted for all storage tanks at PMRF by a third-party environmental engineering firm every 2 years. Please see the Final EIS for more information. As discussed in more detail in Water Resources (Section 3.7.1.4.1.2, Mānā Water Well) of the Final EIS, groundwater is pumped at the Mānā Well, and daily water quality monitoring is performed at five established test stations throughout the water distribution system to test for sudden or gradual changes in water parameters. The Department of Defense has exceeded current Environmental Protection Agency (EPA) guidance and proactively implemented policies to monitor drinking water for PFAS at all service owned and operated water systems at a minimum of every 2 years. Per the 2024 Mānā Well Consumer Confidence Water Quality Report, over 70 regulated contaminants that have the potential to be in drinking water were tested in 2023, and in all cases, the levels measured were well within requirements for safe drinking water, and all drinking water testing results were below the method reporting limit for all PFAS compounds. The Navy repeated drinking water testing in 2024 and 2025 (except PFAS testing, as compliance monitoring is not required until 2027 per the EPA) and like previous results, all levels measured were within both EPA and State requirements for safe drinking water. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Hazardous Materials and Waste

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0043	D. Green, C. Burghardt		5	The DEIS **omits cumulative impact analysis of RIMPAC military exercises**, despite significant environmental effects, failing to comply with the National Environmental Policy Act (NEPA, 42 U.S.C. §4332) and HRS §343-5, which require consideration of cumulative environmental impacts.	The Navy and NASA respect your concerns regarding other military operations; however, the Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Consistent with Hawai'i Administrative Rules section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0043	D. Green, C. Burghardt		6	**It does not meet the Ka Pa'akai o Ka 'Āina standard** (94 Hawai'i 31 [2000]) for protecting Native Hawaiian cultural resources and practices, and it fails to document meaningful consultation with Native Hawaiian organizations as required under HRS Chapter 343 and Hawai'i State Constitution Article XII, Section 7.	The Board of Land and Natural Resources will conduct its Ka Pa'akai O Ka 'Āina analysis using information from the Final EIS. Section 3.3 (Cultural Practices) of the Final EIS provides a summary of the findings of the Cultural Impact Assessment (CIA), which documents the consultation with Native Hawaiian Organizations. Appendix F contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment.	Cultural Practices
0043	D. Green, C. Burghardt		7	The proposal for permanent federal acquisition of over 8,000 acres of public trust lands **violates Hawai'i Constitution Article XI, Sections 1 and 7**, which mandate state stewardship and protection of natural and cultural resources for present and future generations.	Section 3.5 (Land Use and Access) of the Final EIS includes a discussion of the history of land tenure and use in the project area. This includes the Public Land Trust established in Section 5 of the Admission Act, and the Proposed Action's consistency with Public Trust Obligations.	Land Use and Access
0043	D. Green, C. Burghardt		8	The DEIS **lacks enforceable measures** to protect public health, groundwater, and ecosystems from hazardous materials and military-related risks, **in violation of HRS §342L and public trust obligations**. Mahalo for reading these comments regarding the insufficient and incomplete DEIS. D. Green C. Burghardt Nuuanu, Oahu	The Navy and NASA fully comply with Hawai'i Revised Statutes section 342L, *Underground Storage Tanks.* Please see response to comment #4 for information on the Good Engineering Practices employed for all fuel storage tanks at PMRF and for information on groundwater water quality monitoring at the Mānā Well. As discussed in Section 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. PMRF also maintains an up-to-date Integrated Natural Resources Management Plan (INRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. The Final EIS presents Enhanced Engagements consistent with applicable environmental requirements. These engagements are intended to provide a general framework for minimizing potential impacts while maintaining flexibility. They have been expanded in the Final EIS in Section 5.2 (Proposed Enhanced Engagements) to include the following: site-specific conservation goals, how and who engagement will be conducted with, and measurement goals. The Navy and NASA will continue to	Hazardous Materials and Waste

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					coordinate management of their respective responsibilities, including in areas of overlap, in accordance with existing plans and consultations.	
0044	Klayton Kubo		1	I would like to add to my verbal comment. Hopefully we can get more Fisher/Hunter Access. And it will be in stone. Meaning when the next Commander comes in he/she can't change it to their liking. I look forward to more discussions about Access. Klayton Kubo Waimea, Kaua'i	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your concerns regarding lack of access to PMRF for fishing and hunting. An Access Management Plan is being proposed in response to comments from the public that the Morale, Welfare and Recreation Pass process could be improved. Details of the Access Management Plan, including requirements for identification, will be subject to Department of Defense and Navy policies concerning security and force protection. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses the Access Management Plan, which would streamline access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.nav.mil.	Land Use and Access
0045	Russell Tsuji		1	Dear Sir/Madam: I did not receive a response to my comments on the DEIS. As a reminder, HRS 343-5 requires the applicant/project proponent to respond to the comments received during the DEIS process. I look forward to receiving the Navy's response. Regards, Russell Y. Tsuji	The Navy and NASA responded on August 1, 2025, confirming comments the commenter submitted via the EIS's web comment form on June 25, 2025, and via email on July 21, 2025, were received. These comments were received during the comment period for the Draft EIS. Consistent with Hawai'i Administrative Rules (HAR) section 11-200.1-26, written comments on the Draft EIS received pursuant to HAR section 11-200.1-25 are responded to within the Final EIS.	EIS Process
0046	Carl Sholin	State Parks Planner	1	Hello, I'm a planner for one of your partnering agencies: Hawai'i State Parks. I would like to request copies of the ArcGIS Geodatabase files that contributed to the Draft EIS. I would like copies of the leased lands and the easements. Thank you very much for your help! All the best, Carl Sholin State Parks Planner	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Unfortunately, the original data is proprietary and cannot be shared. However, the Tax Map Keys (TMKs) for the Project Area are included throughout the Final EIS. Also, Figures 1-3, 1-4, and 2-1 through 2-14 of the Final EIS have been revised to include the TMK parcel numbers. The Navy and NASA also recommend georeferencing the boundaries based off the TMK parcel numbers.	EIS Process
0047	'Ohana Keana'aina, Keli'ikoa, Kai'aokamalie & Bator		1	19 July 2025 To: Dawn N.S. Chang, Chairperson- Board of Land and Natural Resources -1151 Punchbowl Honolulu, 96813 To: David A. Reth, Director Management Operations -NASA Goddard Space Flight Center To: Robert Prince, Captain, U.S. Navy, Commanding Officer-PMRF To: Naval Facilities Engineering Systems Command, Environmental OPHEV-2 Atten: PMRF and KPGO Atten: *EIS* Navy Project Manager, Kerry Kylene Ling 400 Marshall Rd -Bldg X-11 - Pearl Harbor, HI 96860 Subject: PROSED REAL ESTATE ACTION -published in the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate draft Environmental Impact Statement (dEIS). **TMK (4) 1-2--001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2- 002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-**	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				001:013 (por.), (4) 1-4-001:014 (por.) **NO ACTION ALTERNATIVE** We are against the proposed REAL ESTATE ACTION published in the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate draft Environmental Impact Statement (dEIS).		
0047	ʻOhana Keanaʻaina, Keliʻikoa, Kaiʻaokamalie & Bator		2	**BOTH** of proposal(s) The U.S. Navy - PMRF to retain the use of 8,172 acres of state lands in Koke'e, Kaua'i **and** the National Aeronautics and Space Administration (NASA) proposal to retain the use of 23 acres of state lands at Kōke'e Park Geophysical Observatory (KPGO). Please Chairperson Chang, - State of Hawai'i- Board of Land and Natural Resources, DO **NOT** renew the leases as proposed by The U.S. Navy PMRF - Please deny the the U.S. Navy- PMRF proposal to retain the use of 8,172 acres of state lands in Koke'e, Kaua'i, and National Aeronautics and Space Administration (NASA) proposal to retain the use of 23 acres of state lands at Koke'e Park Geophysical Observatory (KPGO).	The Navy and NASA note your opposition to the Proposed Action.	General Opposition
0047	ʻOhana Keanaʻaina, Keliʻikoa, Kaiʻaokamalie & Bator		3	Please **No Real Estate Action** on TMK(s) **(4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2- 002:025, (4) 1-2--002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2--002:029, (4) 1-2--016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)** Let ALL leases expire in 2027 and 2030 No more real estate agreements with the U.S. Navy - PMRF leasing the State of Hawai'i Lands of 8,172 acres, **No Real Estate Action** on TMK(s) **(4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2- 002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2- 002:025, (4) 1-2--002:026, (4) 1-2--002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4--001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)** NO ACTION ALTERNATIVE Sincere ALOHA, 'Ohana Keana'aina, Keli'ikoa, Kai'aokamalie & Bator	The Navy and NASA note your opposition to the Proposed Action and preference for the No Action Alternative.	Action Alternatives
0048	Michael Jones		1	24 July 2025 BY: USPS TO: Naval Facilities Engineering Systems Command Hawaii Environmental OPHEV2 Attn.: PMRF and KPGO RE DEIS Project Manager Ms. Kerry Ling, 400 Marshall Road Building X-11, Pearl Harbor HI 96860 FROM: Michael Jones Thanks for sending me a printed copy of volume 1 of the 2025 PMRF and KPGO RE DEIS. Because this DEIS does not contain details about the missiles to be launched from PMRF and other launch sites I have included comments on previous EIS documents -- in particular the 1998 PMRF Enhanced Capability final EIS and the 2008 PMRF Hawaii Range Complex FEIS/OEIS.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. As described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the Navy's current and proposed use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Approximately 95 percent of the easement lands are passively used for encroachment buffers and mission readiness, the remaining 5 percent of easement lands are used for access and utility easements. No ground-based training occurs on these leasehold and easement lands" The Proposed Action is described in Chapter 2 of the Final EIS, and includes two action alternatives: Alternative 1 which includes securing new real estate agreements (Section 2.3.1, Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2, Alternatives Carried Forward for Detailed Analysis/Alternative 2: Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds). Neither action alternative includes additional development or change in current uses. This is why the EIS does not include details about missiles launched from PMRF. Navy training and testing operations do not occur on State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5, Scope of Environmental Analysis of the Final EIS. The 2025 Hawaii-California Training and Testing (HCTT) Final EIS/OEIS	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA include additional information about missiles launched from PMRF.	
0048	Michael Jones		2	My comments on the 1998 PMRF Enhanced Capability final EIS are dated 1/4/1999, Those on the draft EIS are reproduced in the final EIS. Page numbers in the final EIS are date FEIS pages 5/31/1998 9-427 to 9-428 5/22/1998 9-382 to 9-383 5/15/1998 9-378 5/3/1998 9-322 to 9-327 + 6 appendices 9-327 to 9-328 app A-1 to A-3 9-329 A-4 9-329 to 9-330 A-5 to A-6	Comment noted. This EIS includes a summary of effects on State lands from activities analyzed in the 1998 PMRF Enhanced Capability Final EIS. Although it is outside the scope of this EIS to respond to comments from the document finalized in 1998, we encourage you to contact PMRF directly for any concerns you have about ongoing activities.	Ongoing Activities
0048	Michael Jones		3	Comments on the 2008 PMRF Hawaii Range Complex FEIS/OEIS are dated 3 June 2008, Those on the draft EIS are reproduced in the final EIS on pages 13-243 to 13-246.	The Navy and NASA appreciate your long standing participation in the National Environmental Policy Act (NEPA) process in the environmental review process conducted for previous activities at PMRF. Active participation is a critical part of the NEPA and HEPA (Hawai'i Revised Statutes Chapter 343) process. This EIS includes a summary of effects on State lands from activities analyzed in the 2008 Hawaii Range Complex Final EIS/OEIS. Although it is outside the scope of this EIS to respond to comments from the document finalized in 2008, we encourage you to contact the Public Affairs Office at PMRF directly for any concerns you have about ongoing activities.	Ongoing Activities
0048	Michael Jones		4	THe PMRF and KPGO RE DEIS lists related environmental analyses for PMRF, page 1-24 1998 PMRF Enhanced Capability final EIS page 1-25 2008 PMRF Hawaii Range Complex FEIS/OEIS A document titled "Laser Safety Survey Report for the Pacific Missile Range Facility Open Ocean Range" was said to be "not releasable to the public" but no justification was given. page 1-28 HDR-Hawaii draft EIS "contains sensitive information and not publicly available"	Relevant resource effects from ongoing activities in the Project Area are summarized in this EIS from the 1998 PMRF Enhanced Capability Final EIS and 2008 Hawaii Range Complex Final EIS/OEIS in Table 3.1-4 of the Final EIS. Regarding documents not made available for the public, the documents identified as containing sensitive information were determined to be so during the Navy's Operational Security (OPSEC) review of this EIS. OPSEC review includes identification of critical information, threat and vulnerability analysis, risk assessment and application of measures and countermeasures. We encourage you to contact the Public Affairs Office at PMRF directly to see if a redacted version can be provided.	Ongoing Activities
0048	Michael Jones		5	Table 1-5 contains a list of environmental documents for PRRF. It des not contain the following: Final EIS for STARS in May 1992 Draft EIS for STARS in March and April 1992 Supplement to the STARS Environmental Assessment in July 1991 Environmental Assessment for the Strategic Target System (STARS) in August 1990 These documents are cited on pages 3-13 and 3-15.	The 1992 Final EIS for the Strategic Target System has been added to the list of previous NEPA/HEPA documents in Table 1-5 of the Final EIS.	Ongoing Activities
0048	Michael Jones		6	launch sites not analyzed Some possible launch sites not analyzed were considered previously, The 1998 PMRF Enhanced Capability final EIS considered sites on Niihau. High energy laser tests on Niihau were considered in the Hawaii Range Complex EIS. Are they still being considered?	See response to comment #1.	Ongoing Activities
0048	Michael Jones		7	fire risk from missile malfunction Section 3.12.1.4.1 discusses handling of hazardous materials including those from missile malfunctions. It does not discuss specific missiles or a record of past launches. In order to evaluate risk from launches, it would be useful to have a list of launches since 1990 including dates and missile types. For launches which had a missile malfunction, it should be noted if the flight was terminated by the range safety officer, if debris hit outside the GHA, and if a brush fire was started. The wildfires on Maui in 2023 and at Vandenberg AFB following a Minuteman failure	See response to comment #1.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				on 15 June 1993 are sobering reminders of fire risks, The fire at Vandenberg AFB burned 1,000 acres. However, the response to my comment on the Hawaii Range Complex EIS stated that "Navy does not see a catastrophic launch failure as a reasonably forseeable impact." Michael Jones 1434 Punahou St, Apt 608 Honolulu, HI 96822		
0048	Michael Jones		8	4 January 1999 Comments on the Pacific Missile Range Facility (PMRF) Enhanced Capability Final Environmental Impact Statement (FEIS) I received the FEIS on 29 Dec. 1998. I have reviewed the FEIS and responses to my comments on the corresponding draft (DEIS). The responses to some of my comments are adequate and provide useful information but most responses avoid important and relevant issues. Some responses are misleading or contain incorrect statements. The EIS is said to be intended to provide the basis for deciding how to enhance PMRF and what remote sites to develop for TMD testing but there is no comparison with capabilities and impacts at other TMD test sites and inadequate detail about what missiles would be launched for tests at PMRF. The comments by the U.S. EPA (pages 9-42 to 9-46) note the uncertainty about what the Proposed Action entails and insufficient information about the purpose and need for the Proposed Action. The EIS is also intended to provide the State of Hawaii information relevant to decisions about land use by the Navy near PMRF, including the restrictive easement for missile launches. However, the FEIS does not specify what missiles and what ground hazard areas require the easement and provides insufficient information to judge what launches are needed for Navy TMD tests. Furthermore, inadequate information is provided to assess environmental impacts, particularly on Niihau. Finally, the statement on page 4-257 that there are no unresolved issues seems to be contradicted by the statement in the 23 Nov. 1998 letter (page K-46) signed by Capt. J.A. Bowlin and Michael D. Wilson that an ethnographic survey will be done prior to conducting activities on Niihau.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		9	Below are detailed comments. The numbers refer to comment numbers in my DEIS comments dated 3 May 1998. (See FEIS pages 9-322 to 9-327.) 1 & 25) Alternatives The response on page 9-330 contains no detailed discussion of alternatives and no additional background information is provided in section 1.1.1 of the FEIS. Comparison with other test ranges is relevant because other ranges have been selected in previous EIS documents. An addition on FEIS page 1-4 notes that previous analyses focused on tests of the Army's land-based interceptors and asserts that PMRF was not selected previously "because of limited instrumentation to support these land-based interceptor needs." There clearly are alternatives for such tests, and there is no Congressional direction that PMRF be the primary range for testing land-based interceptors. In addition, Navy TBMD tests are considered as possibilities in the 1998 EIS for TMD tests at the Eglin Gulf Test Range.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		10	The diagrams in Fig. 1.4-1 of the various options within the Proposed Action provide a good illustration of the uncertainty noted in comments by the U.S. EPA. How can decision makers and the public evaluate the Proposed Action when there are some many options within it? For example, there are five possible missile launch sites at PMRF and two on Niihau for both targets and interceptors. (The diagram of target options incorrectly states that Niihau site A is the South Site and site K is the North Site.) The impacts depend upon how many sites and which sites are used and what missiles are launched from them. Tests of Navy interceptors would presumably not require long-range targets launched from PMRF or Niihau and thus would seem to	See response to comment #2.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				reduce the impacts there. As noted above, there are alternative ranges for tests of land-based interceptors. Therefore, it seems justified to present this as a separate alternative.		
0048	Michael Jones		11	2) Missiles to be launched at different sites The response on page 9-330 does not indicate which missiles would be launched at the different potential launch sites on Kauai and on Niihau. This information is essential to evaluate the necessity for and adequacy of the ground hazard area (GHA) at each site and treaty compliance.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		12	3) Ground Hazard Areas (GHA) The response on page 9-330 refers to FEIS Section 4.1.1.7.1.1 but this section contains only a discussion of a generic GHA. Neither the response nor the FEIS explain what "adjustments in system performance and adjustments in allowable flight termination response time" are needed to reduce the Hera GHA radius from the nominal value of 23,000 feet to 10,000 feet. The response incorrectly asserts that a 13,000 foot GHA was identified in the 1994 Wake Island EA; as I noted in my comment on the DEIS, the Hera GHA radius is given as 7.2 kilometers (over 23,000 feet) in three previous environmental analyses, including the 1994 Wake Island EA. The FEIS should have given the flight termination response times corresponding to different GHA radii. The response on page 9-241 to a simulation by David Wright of debris dispersal from a plausible Hera failure is egregiously inadequate.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		13	4) Missile reliabilities The response on page 9-331 gives no reliability estimates and asserts that "the reliability of individual missiles cannot be used to predict overall program reliability." Even if the overall program reliability depends on other factors and given that not all failures result in flight termination, missile reliabilities are important and relevant factors in determining the risk from launch failures. The response asserts that all debris from the Hera flight termination on 17 Nov. 1997 was contained within the pre-specified safety area. This is relevant for evaluation of the adequacy of the safety area -- which is why I suggested a similar analysis of the Minuteman and Aries failures in my comment 5.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		14	5) Analysis of previous accidents as possible launch failures The response on page 9-331 avoids discussion of the Minuteman and Aries failures I cited. No comparison is made of the capability of the MAET fire suppression with that at Vandenberg AFB, where the Minuteman failure occurred. No response is made about debris from the Aries failure which fell on land as far as 13,500 feet from the launch pad despite the fact that an Aries launch at PMRF in November 1998 apparently had a GHA radius of 10,000 feet. Plans for such an Aries launch were not mentioned in the FEIS even though an amendment to the Restrictive Easement was required.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		15	6) Risk analyses, safety record for missiles near Kauai The response on page 9-331 states that risk analyses have not been done for each launch vehicle proposed but does not state for which vehicles analyses have been done. Until these analyses are done there is no basis for the assertion in the response that "minimal risk exists to public safety." The fatality in the December 1988 accident is important and relevant because it demonstrates that safety measures can fail and suggests that the actual risk may be considerably larger than the goal of an annual collective risk less than 0.001 fatalities.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		16	7) Trajectories for targets and interceptors The response on page 9-331 asserts that "specific trajectories and impact zones do not have to be provided." Without this information, there is no basis for judging the risk. As I noted in my comment on the DEIS, this information is provided for various testing scenarios in the Gulf of Mexico.	See response to comment #2.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0048	Michael Jones		17	8-10) Treaty restrictions on targets launched at sea and on air-drop targets The treaty compliance issues noted in my comments are important and relevant because some proposed tests seem to violate INF Treaty restrictions, as recognized in the 1994 TMD Extended Test Range EIS. The response on page 9-331 states merely, "We will not implement any actions that are not in accordance with current U.S. policy on treaty compliance." Without a detailed discussion of compliance issues, this statement is no more reassuring than the statement by Pres. Reagan in 1986 that the U.S. would not trade arms for hostages.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		18	11-12) Monitoring results from STARS launches The response on page 9-331 does not even mention results of air quality monitoring for the 3rd STARS launch on 22 July 1994 and does not discuss the lack of monitoring data at the GHA boundary downwind of the launch pad for both launches for which monitoring was done. The absence of relevant data at the GHA boundary means that there are no measurements that can be used to assess air quality impacts.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		19	13) Lead contamination in soil The response on page 9-331 states that the reference to the report on the baseline soil sampling has been corrected and notes that this is the only soil sampling conducted to date. The baseline results are useful and relevant, but the lack of any other sampling hardly seems to satisfy the commitment to periodic monitoring in the Oct. 1993 Restrictive Easement Final EIS that the Navy "will conduct a baseline survey for possible lead contamination around the Vandal launch site and conduct periodic monitoring to assess the potential impacts from all launches from that launch site."	See response to comment #2.	Ongoing Activities
0048	Michael Jones		20	The response further asserts that "all of the samples were well below" U.S. EPA and State of Hawaii cleanup goals for commercial or industrial use property. Presumably this statement refers to the lead levels in these samples. However, neither the response nor the FEIS text gives numerical values of commercial or industrial cleanup goals although an addition on page 3-47 of the FEIS states that the State of Hawaii 400 mg/kg cleanup goal applies for residential use. The letter from Bruce Anderson on page 9-124 notes that the Hawaii cleanup guideline for commercial and industrial use is 1000 parts per million (equivalent to 1000 mg/kg). I noted in my comments on the soil sampling report (see page 9-378) that the highest lead level in the samples was 980 mg/kg. It seems misleading to characterize this as "well below" the Hawaii guideline. Because the future use of the land near the Vandal launch pad is uncertain, it is unclear which cleanup guideline should be applied. (On FEIS page 3-63, it is noted that PMRF is located within a conservation district according to State of Hawaii Land Use Classification.) One might have hoped that the more stringent guideline would be used, especially because the high lead levels resulted from a launch failure and were apparently confined to relatively small areas. In fact, paragraph 9 of the existing Restrictive Easement for STARS and Vandal launches (FEIS Appendix C) states that the GRANTEE will "clean up any debris or any releases of hazardous substances resulting from its launches in accordance with all federal and applicable State and local environmental laws."	See response to comment #2.	Ongoing Activities
0048	Michael Jones		21	14) STARS launches through 2030 The response on page 9-331 provides no information on planned STARS launches or launches of other large rockets. An Aries launch from PMRF in November of 1998 was one of two allowed by a 28 August 1998 amendment to the Restrictive Easement. Estimates of future STARS and Aries launches seem necessary to judge cumulative impacts.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		22	15) Vandal launches through 2030 The response on page 9-331 does not give the number of Vandals in the current supply or an estimate of the number of Vandal launches expected. How can the	See response to comment #2.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				cumulative impacts due to lead contamination be assessed without this information and specific information about possible Vandal replacements?		
0048	Michael Jones		23	17) Record of launches under existing easement The response on page 9-332 notes that Table 3.1.2-1 has been revised. The information about the launches using the 10,000 foot GHA has indeed been corrected but the changes to the numbers in the 6,000 foot GHA column are confusing because some of the numbers lined out were not in the DEIS. No information is provided about the length of time exclusive control of the easement area was exercised. The response does not specifically discuss my comment that the 15 Vandal launches in 1994 exceeded the commitment to an annual maximum of 8. Although the easement does not explicitly limit the number of launches, the draft and final Restrictive Easement EIS stated that there would be "no more than eight Vandal launches in a 1-year period."	See response to comment #2.	Ongoing Activities
0048	Michael Jones		24	18) Revised Restrictive Easement The two-sentence response on page 9-332 provides no information on what missiles and which launch pads require the easement. It does not address whether the easement is needed for Navy TBMD tests. From the testing scenarios illustrated in the FEIS, it seems that the easement would be primarily for land-based interceptors launched from PMRF, for which there is no Congressional direction. Without specific information about missiles and their ground hazard areas that will be subject to the easement, there is no way for the State of Hawaii or the public to assess whether the easement is needed and appropriate.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		25	19) Niihau -- fire danger The response on page 9-332 makes no attempt to evaluate the adequacy of the proposed fire fighting equipment that would be brought to Niihau.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		26	24) Public access to related documents I do appreciate the effort made to provide the 15 documents I requested. As I noted in my comments dated 22 May (page 9-382), 13 of the 15 documents were available only a week before the 26 May deadline for comments. I was able to make a special effort and briefly review these documents during Hamilton Library hours but it would have been very difficult for most people to access these documents even if they were aware of their availability. For this reason I requested an extension of the public comment period. Given that consultations with federal agencies continued until October (The 21 October 1998 letter from the National Marine Fisheries Service notes on page K-24 that the Navy requested the removal of Tern Island and Johnston Atoll in September.) and that consultations with the State of Hawaii continued until late November (as evidenced by letters on pages K-36 through K-47), it is hard to understand why the formal deadline for public comment was not extended.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		27	26) Navy Theater-Wide testing The response on page 9-332 continues to assert that, ''The Theater-Wide program is not sufficiently developed to be included in this analysis." The information cited in my comment, including the information in the 3 March 1997 Coordinating Draft Siting Report that I cited in my comment dated 22 May, shows that the Theater-Wide program is sufficiently well-defined that potential launch sites and scenarios have already been examined. At the very least, information about these launch sites should have been included in the FEIS because the Siting Report is not readily available.	See response to comment #2.	Ongoing Activities
0048	Michael Jones		28	27) TMD testing schedule The response on page 9-332 provides no schedule information and does not respond to the information I cited in GAO report NSIAD-98-34. The FEIS should have provided some schedule information; it should surprise no one that PMRF operations would not be constrained by any schedule given in the FEIS.	See response to comment #2.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				The response on page 9-379 implies that the lead levels in the soil samples taken near the Vandal launch pad were compared to the U.S. EPA remediation and State of Hawaii cleanup goals for commercial and industrial property in the Soil Contamination Report. As my comment noted, the lead cleanup goals mentioned in this report were 500 mg/kg and 400 mg/kg respectively. The report notes that samples at two sites had lead levels exceeding these goals and does not discuss cleanup goals for commercial and industrial property. Response 1 on page 9-429 implies that my comment suggested an alternative involving launching targets between PMRF and USAKA. My comment on page 9-427 referring to the 1995 USAKA Temporary Extended Test Range Environmental Assessment was that USAKA is an alternative to PMRF for tests of Patriot land-based interceptors. The Congressional direction to which the response refers concerns only tests of Navy interceptors, not tests of land-based interceptors. The response avoids discussion of my suggestion on page 9-428 for distinguishing tests in which the intercept is intended to occur near PMRF from tests in which the intercept is off-range. The response provides no explanation why the 3 March 1997 Siting Report was not made available to the public during the scoping meetings in June of 1997.		
0048	Michael Jones		29	The comments expressed above are based on my review of the DEIS, FEIS, and related documents. These comments are my views and are not official positions of the Dept. of Physics & Astronomy or of the Univ. of Hawaii. I hope they will be considered before the Record of Decision is released. Michael Jones Dept. of Physics & Astronomy Univ. of Hawaii 2505 Correa Road Honolulu, Hawaii 96822	See response to comment #2.	Ongoing Activities
0048	Michael Jones		30	3 June 2008 via E-mail to: feis_hrc@govsupport.us Below are my comments on the final EIS/OEIS for the Hawaii Range Complex. I received the printed Executive Summary and CD containing the final EIS/OEIS in an envelope postmarked 14 May 2008. The cover letter states that comments must be received by 9 June 2008 but this clearly does not allow a 30-day period for public comments. The deadline should be extended until 30 June.	See response to comment #3.	EIS Process
0048	Michael Jones		31	The response to my comment S-E-0003-1 on page 14-113 asserts that NEPA does not require indications noting whether references are available for public review. As I noted in my comment, one of the documents I requested (Solis, P., 2004) was said to be "not releasable to the public." It is labeled "For Official Use Only" on page 9-89 of the final EIS. The response does not justify why this document, which is titled "Laser Safety Survey Report for the Pacific Missile Range Facility Open Ocean Range" is being withheld.	See response to comment #3.	EIS Process
0048	Michael Jones		32	The response to comment D-E-0324-4 on page 13-473 does not address the two examples I gave which demonstrated that alternatives to the HRC exist for some Navy training activities.	See response to comment #3.	EIS Process
0048	Michael Jones		33	The response to comment D-E-0324-7 on page 13-474 dismisses my comments about INF and START Treaty restrictions as "not applicable to the proposed tests discussed in this EIS/OEIS." The response does not address the apparent violation of INF range restrictions on target missiles in the conceptual intercept scenarios in Figs. 2.2.2.5.1-4 and 2.2.2.5.1-5.	See response to comment #3.	EIS Process
0048	Michael Jones		34	The two-sentence response to comment D-E-0324-18 on page 13-477 is egregiously inadequate. It asserts that "Navy does not see a catastrophic launch failure as a reasonably forseeable impact" despite the explicit example I cited of the 15 June 1993 Minuteman failure at Vandenberg AFB. I noted that a brush fire resulting from a similar failure at PMRF could trap people in Polihale State Park.	See response to comment #3.	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0048	Michael Jones		35	The response to comment D-E-0324-19 on page 13-477 asserts that the HRC EIS/OEIS "does evaluate Aegis Ballistic Missile Defense (BMD) tests." It does not address why no environmental analyses, including conceptual intercept scenarios, were done for previous Aegis BMD tests. Michael Jones Dept. of Physics & Astronomy Univ. of Hawaii 2505 Correa Road Honolulu, Hawaii 96822	See response to comment #3.	EIS Process
0049	Nathaniel Fisher		1	My name is Nathaniel Fisher. I'm 38 years old, born and raised here on the island of Kaua'i. I'm writing regarding public access to the coastline fronting the PMRF base. Growing up, I spent countless days camping, surfing, and enjoying bonfires with friends and family in the area between Shenanigans and Majors Bay reef. It was open, accessible, and free of charge; a place full of memories that shaped my childhood. While I recognize and respect the value PMRF brings to Hawai'i, restricting coastal access for local residents feels both unnecessary and disheartening. Here on Kaua'i, we're constantly watching treasured places slip out of reach. Another trail closed. Another waterfall off-limits. Another beach access lost to development or private ownership. I urge PMRF to consider a solution that allows local residents to access these coastal areas without costly fees or burdensome restrictions. Access to the ocean is part of who we are. Please help preserve that connection. Mahalo for your time and consideration, Nathaniel Fisher	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. As described in Land Use and Access (Section 3.5) of the Final EIS, PMRF began the Morale, Welfare and Recreation (MWR) Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay (formerly called Majors Bay) and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Land Use and Access (Section 3.5) of the Final EIS, the Proposed Action does not change public access at PMRF. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses the Access Management Plan, which would streamline access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Land Use and Access
0050	Shyanne Olores		1	Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kaua'i. I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our 'ohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciate the information you provided about your family lineage. The Navy and NASA hear your concerns regarding military operations and cultural practices. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS.	General Opposition
0050	Shyanne Olores		2	Let me be absolutely clear: this is not America. These are stolen lands. Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied 'āina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives.	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	General Opposition
0050	Shyanne Olores		3	Over the past 7 years, seven members of my 'ohana from Mana and Kekaha have died from cancer. All of them worked in agriculture. We know this land has been poisoned. PFAS contamination has been documented at PMRF since the 1960s, and still — over 60 years later — the Navy has failed to clean it up. The Draft EIS casually	The Navy and NASA respect your concern regarding cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner.	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				states that "remediation is forthcoming," while Kanaka continue to die. That is environmental negligence and cultural violence.	Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	
0050	Shyanne Olores		4	The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we've seen at Red Hill — and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future.	The EIS discloses general fuel tank locations (exact location cannot be provided for security reasons) and provides an extensive discussion on drinking water monitoring conducted at PMRF. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. Fuel storage tanks located on fee simple land are not analyzed in this EIS; however, aboveground storage tanks and underground storage tanks on fee simple land are disclosed in the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1.1.1.6 of that document, which is publicly available, and can be found on the EIS website (www.pmrf-kpgo-eis.com). Water quality monitoring programs are conducted at PMRF to test for the presence of PFAS and other contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) of the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Hazardous Materials and Waste
0050	Shyanne Olores		5	The Draft EIS fails to account for the full mauka to makai impacts of PMRF operations. It ignores the destruction caused by rocket launches, amphibious assaults, live-fire drills, and ongoing military exercises such as RIMPAC. It completely omits the environmental and cultural devastation these activities cause — not only on Kaua'i, but globally, as PMRF supports the testing and export of weapons used in international conflict and genocide.	The Navy and NASA respect your concerns about addressing PMRF from mauka to makai. The Navy and NASA have conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawai'i Revised Statutes Chapter 343) and National Environmental Policy Act (NEPA). As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration	Ongoing Activities

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					Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. The Navy and NASA respect your concerns regarding other military operations; however, the Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0050	Shyanne Olores		6	I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS. We reject mitigation. We reject any expansion. We reject continued occupation. We demand that the United States: 1. End the lease. 2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste. 3. Restore sacred sites, including the dunes at Nohili. 4. Return all lands under PMRF to the rightful stewards — the Kanaka Maoli. PMRF is not defense. It is desecration. And we will not stand by while our ʻāina, our culture, and our families are poisoned in the name of war and profit. This is not America. This is Hawaiʻi. And the U.S. military must get out. Mahalo for receiving this testimony. I do not stand alone. Me ka ʻoiaʻiʻo, Shyanne Olores	1) Your opposition to the Proposed Action has been noted. 2) Please see response to your comment #3 above for more information on the ongoing PFAS investigation and upcoming remedial investigation. There are no tanks with active fuel leaks at PMRF. As discussed in Hazardous Materials and Waste (Section 3.12) of the Final EIS, all hazardous waste produced on leasehold and easement lands is handled, managed and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. 3) Your request to restore sacred sites, including the dunes at Nohili are recognized. 4) The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. Your opposition to the presence of the U.S. military is recognized.	Land Use and Access
0051	Donald Wilson	CAPT, USN (Ret)	1	Naval Facilities Engineering Systems Command Environmental OPHEV2 Attn: PMRF and KPGO Re EIS PM, Ms. Kerry Ling 400 Marshall Road, Bldg. X-11 Pearl Harbor, HI 96860 Dear Ms. Ling, Please accept these comments from a former Pacific Missile Range Facility (PMRF) Commanding Officer and, subsequently, Project Manager for two separate contractors whose work was on PMRF, and supportive of its missions.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy and NASA's activities as valuable to the community and the land.	General Support
0051	Donald Wilson	CAPT, USN (Ret)	2	PMRF is a unique national asset, whose range facility covers a broad ocean area the size of the continental U.S., west of the Mississippi River -and the air above it, and the seas beneath it. Its geolocation is paramount to its mission, and affords the U.S. and its allies, a safe, unobstructed area in which to train, exercise, Test and Evaluate (T & E) new technologies, and verify the efficacy of legacy systems. No other test and/or training	The Navy and NASA thank you for your support of PMRF and its mission. Section 1.3 (Background) of the Final EIS further describes the Navy and NASA's land use and respective missions at PMRF.	General Support

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				facility in the U.S. affords the nation this capability, and our country is blessed to have use of this invaluable asset.		
0051	Donald Wilson	CAPT, USN (Ret)	3	But PMRF's contributions are not limited to what it provides our military, nor that of our allies, nor Test & Evaluation professionals. *It is an integral part of the island's community.* **PMRF is the third greatest contributor to Kauai County's economy,** providing employment for more than nine hundred civilian (federal civil service and contractor) residents, in many cases, spanning multiple generations. And its U.S. military contingent, primarily US Navy, adds another one hundred plus personnel. During bi-annual (every even-numbered year) Rim of the Pacific ("RIMPAC") multi-national exercises, and/or specific T & E events, many other scientific, engineering, and technical experts work at PMRF for weeks at a time - and stay at local hotels, use rented vehicles, and patronize local restaurants, grocery stores, etc .. The combined spending and payroll accounts for these various entities assure a steady, viable revenue source for the county, and is routinely factored into Kauai's annual budget.	The Navy and NASA thank you for your recognition of the Navy and NASA's activities as valuable to the community and local economy. PMRF's economic contributions are discussed in Section 3.6 (Socioeconomics) of the Final EIS. The potential effects from all alternatives are analyzed and compared in Chapter 3 (Affected Environment and Environmental Consequences) of the Final EIS.	Socioeconomics
0051	Donald Wilson	CAPT, USN (Ret)	4	While this paper has thus far focused on PMRF's unique contributions to our nation's (and allies) defense, and its monetary benefits to the county, **PMRF is a faithful steward of the leased land on which it sits** - and will literally adjust, postpone, or cancel planned events if there is any doubt as to safeguarding private boaters/fishers in adjacent waters, shearwaters and Laysan Albatross, breeding/calving whales, seals, and protecting feral goats on Makaha Ridge. In those instances, the range is not just an incubator of sorts, it is a facilitator, perpetuating species whose survival rate would be greatly reduced if not for conscientious and rigorous protection efforts, which take priority.	The Navy strives to balance military readiness with long-term environmental and cultural resource protection. As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities, including threatened and endangered marine species, are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. These documents incorporate mitigation measures in place to reduce potential adverse effects.	Biological Resources
0051	Donald Wilson	CAPT, USN (Ret)	5	**PMRF is also committed to honoring and preserving ancient Hawaiian skeletal remains** ("iwi kupuna"), and built an appropriate ossuary to protect them, and remind current generations of their ancestors' legacy. Any iwi kupuna uncovered on PMRF land due to wind, wave, or man-made impact, are carefully and respectfully interred in this ossuary, with the blessings of a Hawaiian kahu (priest), surrounded by lava rock and appropriate signage. For those unaware, Nohili point is the western-most part of Kauai Island, and in Hawaiian belief, the jumping off place for the spirits of deceased Hawaiians.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy's commitment to honoring and preserving iwi kūpuna.	Cultural Practices
0051	Donald Wilson	CAPT, USN (Ret)	6	PMRF also has clearly marked and protected cemeteries for Japanese immigrants who came to Kauai in the 1880s to work in agricultural fields. While these cemeteries pre-dated the creation of (in succession), the first Kauai airfield, then the US Army Air Corps, then the US Air Force, and now, the US Navy, PMRF is still respectful of, and restricts access to, these cemeteries in honor of those of Japanese ancestry who contributed to Kauai's history. Their legacy assured successive generations would	Thank you for your and recognition of the Navy and NASA's activities as valuable to the community and the land. The Japanese cemetery at PMRF is not located in the Project Area but it is managed and protected by process and procedures included in the ICRMP.	Archaeological and Architectural resources

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				continue to migrate and contribute to the fabric of Hawaii, through each of the major islands. Medal of Honor recipient Daniel Ken Inouye, former US Senator, and other Hawaii born and raised Americans of Japanese ancestry, particularly members of the esteemed 442nd Regimental Combat Team, demonstrated their loyalty to the United States through their sacrifices. US Senator Inouye was a resolute supporter of PMRF (" ... my base ... ") said he on several occasions, referring not to his personal gain, but for the country as a whole. Indeed, every major island within the Hawaiian archipelago has at least one significant project attributed to US Senator lnouye's commitment to the State, and by extension, to the nation's defense.		
0051	Donald Wilson	CAPT, USN (Ret)	7	PMRF's other community-related efforts include hosting **Blood Bank of Hawaii**, where they made the largest single collection effort at that time from one Kauai entity. PMRF collaborates with **Kauai Community College** on high-tech related degrees to encourage and support Kauai students who, once graduated, become viable employment candidates for PMRF, assuring careers, not just jobs. As a former CO, I made it a point to meet with KCC principles to emphasize PMRF's desire for degreed mechanical, electronic, and other skills to perpetuate the bond between the school, its students, and PMRF. **PMRF "owns"** (is a sponsor of) **a portion of Highway 50** from its Main gate to Kekaha Beach Park, and as such periodically clears/removes trash ('"opala") from either side of the road. It should be noted Kauai's only trash landfill is on this stretch of highway, and trash is routinely spilled from commercial and individual trash "runs" to the landfill. This is an arduous, dirty, and somewhat risky undertaking, given the traffic volume to/from the base, and particularly in vicinity of the dump. Nonetheless, this is essentially an "all hands" effort, consisting of USN Sailors, federal civil service, and contractor personnel in this "good neighbor'' effort.	Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS also describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively.	Socioeconomics
0051	Donald Wilson	CAPT, USN (Ret)	8	**PMRF established a strong, respectful, and mutually beneficial relationship with Niihau** and its small population. The island supports, and participates in, USN Special Operations training for its SEALs, with residents acting as an "opposing" force. And, because PMRF relies on sensors (radar repeaters/radios/diesel-electric generators) installed on the island, the base has trained residents in maintenance and repair skills necessary for recurring operations. Many years ago, the US Navy restored -and gifted - a WWII-era landing craft to support heavy lift operations between Kauai and Niihau. This assures residents they can cross the 18 mile distance between the islands via a mutually beneficial method, and at a fair price: manuahi.	The Navy and NASA respect your recognition of services related to other military installations. Impacts to Ni'ihau Island are outside the jurisdiction and scope of this EIS.	General Support
0051	Donald Wilson	CAPT, USN (Ret)	9	Supports and sponsors interns for **Leadership Kauai** training, where aspiring youth can learn from those in various professions, to help shape their interests, and refine their leadership skills to the benefit of their employers and subordinates. This opportunity is available to incumbent PMRF employees (federal civil service, US Navy, and contractors), and is competitive. PMRF's Commanding Officer is an ex officio member of the **Kauai Economic Council**, in recognition of the base's contribution both monetarily and as an employer, independent of the tourist industry. This fact cannot be overstated: PMRF affords good paying, career-oriented federal Wage Grade and General Schedule (WG/GS) job opportunities, as well as those hired as contractors. These individuals are homeowners or renters; school their children in local schools, pay taxes, patronize local businesses, and are fully integrated within all kinds of community events, whether formal or improvised. It is not unusual to have three generations of Kauai-born and raised family members *concurrently* work aboard PMRF, as career employees. Given their lengthy tenure, they are exceptionally well qualified professionals, whose outstanding work is often recognized by large Mainland defense corporations, who count on them for a full suite of services and support.	Continued operation of PMRF would continue to benefit the region of influence economically by providing employment (approximately 900 personnel) and expenditures of approximately $150 million annually in salaries, contract goods, and services.	Socioeconomics

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0051	Donald Wilson	CAPT, USN (Ret)	10	**PMRF's incumbent Community Planning Liaison Officer is the daughter of a previous PAO**; both were born and raised on the west side of Kauai, and are highly respected and revered within the community, assuming not only PAO responsibilities, but concurrently serving as staunch community/PMRF advocates, clearly steeped in the culture, history, and governance of Kauai in particular, and the State of Hawaii in general. They establish and perpetuate the strong bond between PMRF and the community, and serve as an unbreakable link between Kauai County Government and PMRF, assuring a cooperative, coordinated, cordial, gracious, and professional relationship. On occasion, there have been contentious issues that could have damaged the relationship. Due to the extraordinary efforts of these two PMRF professionals, whatever the issue, was favorably and mutually resolved by both parties. Their work serves as the model for any federal government/local community relationship, and I'm one of a string of PMRF CO's who was the beneficiary of their individual and collective, outstanding support.	The Navy and NASA are presenting Enhanced Engagements under the action alternatives that propose additional property management protections for the ʻāina. Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Cultural Practices
0051	Donald Wilson	CAPT, USN (Ret)	11	**Kauai Island Utility Cooperative** (KIUC) recently completed installation of a photoelectric "farm" and electrical storage (battery) facility aboard PMRF, providing reliable, "clean," solar power primarily to the Westside, and also to the base, if needed. It provides a reliable source of energy, and its panels are protected within the base's fenced perimeter. See the attached KIUC information paper, dated 2018.	PMRF has invested in renewable energy. The PMRF Solar Photovoltaic Park encompasses 140 acres and generates 70 megawatt-hour electricity and supplies enough clean energy to power 6,000 households. The Environmental Assessment prepared for the Joint Forces Solar Power Generation Project at PMRF is referenced in the Final EIS. Also, please refer to Section 4.1.5 (Introduction to Analysis/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS to read about ongoing renewable and clean energy projects and projects slated for future development at and within the vicinity of PMRF.	Utilities
0051	Donald Wilson	CAPT, USN (Ret)	12	**PMRF's crash/fire department** augments Kauai Fire Department through a Memorandum of Agreement (MoA), which assures mutual fire/emergency support. The result is a commitment to each "partner" (KFD and PMRF Crash/Fire) to support one another as necessary. This effort is not just restricted to crash/fire equipment common to airfields; PMRF's helicopters have been used to conduct helo water drops during brush fires. Moreover, the airfield itself has often been used to support emergency medical evacuation flights for patients needing exigent support on Oahu. Rather than driving from Kekaha, for example, to Lihue, specifically configured aircraft can fly into PMRF, pick up the patient, and transport him or her to Oahu when lime is of the essence. Ironically, or perhaps not, PMRF's Crash/Fire training is so rigorous, it serves as a "farm team" for the Kauai Fire Department; those who choose to leave PMRF after being trained as firefighters and certified EMS professionals, are treasured recruits for Kauai FD.	Thank you for recognizing services provided by PMRF. PMRF Crash/Fire provides firefighting services to PMRF and, under a Memorandum of Understanding with the County of Kauaʻi, PMRF Crash/Fire provides firefighting services to the County on non-Department of Defense lands.	Socioeconomics
0051	Donald Wilson	CAPT, USN (Ret)	13	**PMRF beach access** was denied to the general public subsequent to the terrorist attack on September 11, 2001. While the threat of a similar attack within the State of Hawaii was less than potential Mainland targets, the country couldn't be sure what specific threats it faced, so it initiated "one size fits all" security enhancements. By effectively closing PMRF, generations of Kauai residents suddenly were disenfranchised from Major's Bay, a particularly desirable swimming and fishing location. In June of 2002, controlled access to PMRF was restored to those who wanted to come aboard the facility, and posed no threat to the installation. This effort was beneficial to both the individuals wanting to resume their prior visits, and the base itself, committed to being a good, reliable, and valued member of the community as a whole.	As described in Land Use and Access (Section 3.5) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapuaʻa Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Land Use and Access (Section 3.5) of the Final EIS, the Proposed Action does not change public access at PMRF. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Land Use and Access

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0051	Donald Wilson	CAPT, USN (Ret)	14	PMRF has radars and other sensors atop **Makaha Ridge**, whose altitude provides an extremely long radar range, perfect for tracking aircraft or ships on the range and, concurrently, accommodating FAA and HI Air National Guard communications assets there, for the same reason. While each has separate responsibilities, they are complimentary if required, and PMRF is a good steward of this land as well. Indeed, feral goats seem to understand once aboard the navy's facility, they are immune from licensed hunters who are allowed "take" outside the fenced areas.	Mākaha Ridge is used for missile tracking and surveillance, as noted in Project Area (Section 1.2) of the Final EIS. Feral goats, as well as other ungulates, contribute to erosion in the area and are a threat to native ecosystems. Per the 2023 PMRF INRMP, the Navy has instituted feral ungulate control measures within the fence line and has also initiated a hunting program, as discussed in Section 3.7.1.4.2.4 (Water Resources/Mākaha and Miloli'i Ridges), and Section 3.4.1.4 (Biological Resources Existing Conditions) of the Final EIS.	Land Use and Access
0051	Donald Wilson	CAPT, USN (Ret)	15	**Culling dead kiawe trees**. PMRF routinely culls dead kiawe because they are a fire hazard, and does so very carefully in case there are iwi kupuna in proximity. And rather than haul the dead branches to the landfill adjacent to Kekaha, PMRF allowed a local community group to do the work, and turn the dead wood into charcoal, to be sold to provide uniforms for Waimea High School's athletic teams. This effort concurrently reduced fire hazards; was performed for free by local community groups; provided charcoal for local consumption, and generated funds for Waimea high school. Another example of PMRF's link to the local community.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy's commitment to honoring and preserving iwi kupuna while managing wildfire hazards.	Biological Resources
0051	Donald Wilson	CAPT, USN (Ret)	16	Unless denied due to increased security levels, or potentially hazardous events related to T & E operations, **PMRF extends invitations to the local community to celebrate National Holidays, where fireworks can be safely displayed for the enjoyment of generations of Kauai residents.** This effort is not just restricted to national holidays; US Navy Seabees built BBQ structures and bathrooms for Major's Bay swimmers/beach goers, and there is no charge for their use. The base recreational facility, "Shenanigan's" is open to any authorized base visitor; it is not restricted to US military active duty, reservists, or retirees - although they all contribute to it through their patronage.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy and NASA's activities as valuable to the community.	Socioeconomics
0051	Donald Wilson	CAPT, USN (Ret)	17	In sum, PMRF's use of leased land has been, and continues to be, exemplary. The command is very respectful of historic, Hawaiian heritage and cultural sensitivities, and ensures assigned personnel adhere to appropriate practices. The base protects feral wildlife, even to the detriment of operations. II is fully invested in KCC, and other Kauai-county related entities with mutually beneficial results, whether fire department, emergency airfield use, and hosting students and leadership trainees. It contributes fiscal resources topped only by Kauai County Government and tourist-related entities, and its local, career employees are essentially two thirds of the total workforce on base. PMRF will continue to be an exemplary "neighbor" to Kauai County and Niihau. It is faithfully committed to being an invaluable, trusted, and integral part of Kauai's fabric, and is respectful and protective of its relationship. In my nearly 38 years of US Navy service, in various capacities, I know of no other US military/local community relationship as strong and as beneficial as PMRF and Kauai. I support without reservation, PMRF's continued access and use of these leased lands in perpetuity, confident the relationship is mutually beneficial, and consistent with Hawaiian cultural belief in what is pono. Donald H. Wilson CAPT, USN (Ret)	Thank you for your service and support of PMRF and its use of leased State land, protection of wildlife, protection of cultural resources, and community support in Kaua'i County. PMRF is very committed to these efforts and would continue these under the Proposed Action. More information regarding community efforts conducted by PMRF may be found in Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS.	General Support
0052	Darlene Muraoka		1	I'd like to say thank you to PMRF for being the stronghold of the West Kaua'i Community throughout the years. Being born and raised in Kekaha, I have witnessed the many contributions that PMRF has provided to our island community. First, economically, PMRF is one of Kaua'a's largest employers who provide many jobs to our local residents with a living wage. These jobs give our children the opportunity to return home to live and work. These jobs also boost our local businesses and economy by fueling the circular flow of money in around the island. When the Kekaha plantation closed the sugar mill, many of the local residents were out of jobs and	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy and NASA's activities as valuable to the community and the land. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS also describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with	Socioeconomics

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				many west Kaua'i residents moved to the mainland or to the east side. Those that stayed in the west side found employment at PMRF. Also I have seen the military contribute their time, talents and treasures during hurricanes Iniki and Iwa by helping the local residents with distributing water, MRE's and other required necessities after both hurricanes. Secondly, PMRF and the Navy are community partners as they participate in many community events such as STEM nights at our west side schools, allow field trips for our students to visit the facility and learn about their operations, giving the next generation inspiration for a career pathway and hope for a better future. PMRF also hosts "Earthday", so the children can learn about marine life and conservation.	community stakeholders, fostering collaboration and addressing local concerns effectively. Thank you for recognizing services and supplies provided to the community by PMRF during natural disasters.	
0052	Darlene Muraoka		2	They are also great partners by allowing the local residents a pass to go on base for recreation access at Majors Bay, Shennigans, the movies and other activities on base. Not to mention, this year, PMRF held the only July 4th celebration on the island free for the entire island community. Lastly, PMRF provides the protection to Kaua'i as well as Hawaii all of the Hawaiian islands we need being vulnerable to threats by foreign countries. The military presence has the equipment and technology to protect the people in Hawaii. In my opinion, PMRF is like the North Star of the west Kaua'i community as it has helped its residents and community find their way through trials and tribulations (hurricanes, recession and recovery) for many years. PMRF has been the stronghold of the west Kaua'i community and should remain at their present location for many years to come. Mahalo.	As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. The Navy and NASA note your support for the Proposed Action.	Socioeconomics
0053	Mary Lu Kelley		1	Aloha. This is RE: the U.S. Navy's and the National Aeronautics and Space Administration's joint Draft Environmental Impact Statement for proposed lease renewal agreements on state-owned land on Kaua'i. My concerns include: 1. The Navy's draft document has significant lapses in its coverage of environmental impacts on the site, specifically the effects on marine ecosystems or the groundwater.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. As discussed in Water Resources (Section 3.7), the Navy and NASA implement best management practices and standard operating procedures for the protection of groundwater resources within the region of influence. These are found in Table 3.7-2 of the Final EIS. As discussed in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) of the Final EIS, groundwater is pumped at the Mānā Well, and daily water quality monitoring is performed at five established test stations throughout the water distribution system to test for sudden or gradual changes in water parameters. Additionally, monthly samples are taken for testing by Hawai'i Department of Health (DOH) for total coliform contamination and sent to a DOH lab for analysis. The Department of Defense has exceeded current U.S. Environmental Protection Agency guidance and proactively implemented policies to monitor drinking water for per- and polyfluoroalkyl substances (PFAS) at all service owned and operated water systems at a minimum of every 2 years. Per the 2024 Mānā Well Consumer Confidence Water Quality Report, over 70 regulated contaminants that have the potential to be in drinking water were tested in 2023, and in all cases, the levels measured were well within requirements for safe drinking water, and all drinking water testing results were below the method reporting limit for all PFAS compounds. The Navy repeated drinking water testing in 2024 and 2025 (except PFAS testing, as	Biological Resources

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					compliance monitoring is not required until 2027 per the EPA) and like previous results, all levels measured were within both EPA and State requirements for safe drinking water. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0053	Mary Lu Kelley		2	2. The Navy's exclusion of Rim of the Pacific (RIMPAC), the world's largest international maritime warfare exercise that is held biannually in Hawai'i.	The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0053	Mary Lu Kelley		3	3.The lack of clarity on the Navy's third "No Action Alternative," which outlines the potential impacts of the Navy not renewing its leases and vacating the site.	Details regarding lease agreements, including under the No Action Alternative, would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Alternative 3: No Action Alternative (Section 2.3.3, Alternatives Carried Forward for Detailed Analysis) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under this alternative.	Action Alternatives
0053	Mary Lu Kelley		4	4. Deep concerns about the environmental impact of the Navy's weapons testing and missile launching initiatives over the years the test range has been in operation. Especially concerned now that SpaceX is going to land or crash their returning vehicles in the Pacific near Hawaii.	The Proposed Action is described in Chapter 2 of the Final EIS, and includes two action alternatives (Section 2.3, Alternatives Carried Forward for Detailed Analysis), Alternative 1 which includes securing new real estate agreements (Section 2.3.1) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2). Neither action alternative includes additional development or change in current uses. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis)." The Navy and NASA respect your concerns related to other training and testing operations. However, impacts regarding SpaceX are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting State and government officials to voice concerns regarding other federal training and testing operations.	Ongoing Activities
0053	Mary Lu Kelley		5	5. Particularly, the Navy's use of PFAs, or Per- and Polyfluoroalkyl Substances.	The Navy and NASA note your concern in regard to PFAS use at PMRF. As of 2025, firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam, have been successfully removed from stockpile and use across all fee simple, leasehold, and easement lands at PMRF. Please see Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS for more information. Section 3.12 of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the DOH and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary	Hazardous Materials and Waste

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					Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	
0053	Mary Lu Kelley		6	6. Increased bombing of Ka'ula.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Kaʻula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kauaʻi Island. Effects to resources on Kaʻula Island from military training were analyzed in the 2025 PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	Ongoing Activities
0053	Mary Lu Kelley		7	7. General loss of my trust in the Navy after Red Hill on O'ahu and Pōhakuloa on the Big Island. Therefore, it's really important that this EIS have clarity and real integrity." Thank you. Do the right thing.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill and Pōhakuloa are outside the jurisdiction and scope of this EIS. In an effort separate from this EIS, the State of Hawaiʻi published a new website in September 2025 to provide the public more access to information about military land leases in Hawaiʻi (https://engage.hawaii.gov/).	General Opposition
0054	Shyanne Olores		1	Written Testimony Opposing the Lease Renewal of PMRF Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi. I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our ʻohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciate the information you provided about your family lineage. The Navy and NASA respect your concerns regarding military operations and cultural practices. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	General Opposition
0054	Shyanne Olores		2	Let me be absolutely clear: this is not America. These are stolen lands. Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied ʻāina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives.	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. With respect to "ceded lands," please see response to comment #1 above.	Land Use and Access
0054	Shyanne Olores		3	Over the past 7 years, seven members of my ʻohana from Mana and Kekaha have died from cancer. All of them worked in agriculture. We know this land has been poisoned. PFAS contamination has been documented at PMRF since the 1960s, and still — over 60 years later — the Navy has failed to clean it up. The Draft EIS casually states that "remediation is forthcoming," while Kanaka continue to die. That is environmental negligence and cultural violence.	The Navy and NASA respect your concern regarding cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawaiʻi Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary	Public Health and Safety

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					Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	
0054	Shyanne Olores		4	The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we've seen at Red Hill — and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future.	The EIS discloses general fuel tank locations (exact location cannot be provided for security reasons) and provides an extensive discussion on drinking water monitoring conducted at PMRF. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment) of the Final EIS. The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. Fuel storage tanks located on fee simple land are not analyzed in this EIS; however, aboveground storage tanks and underground storage tanks on fee simple land are disclosed in the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1.1.1.6 of that document, which is publicly available, and can be found on the EIS website (www.pmrf-kpgo-eis.com). Water quality monitoring programs are conducted at PMRF to test for the presence of PFAS and other contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Affected Environment) of the Water Resource section of the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Hazardous Materials and Waste
0054	Shyanne Olores		5	The Draft EIS fails to account for the full mauka to makai impacts of PMRF operations. It ignores the destruction caused by rocket launches, amphibious assaults, live-fire drills, and ongoing military exercises such as RIMPAC. It completely omits the environmental and cultural devastation these activities cause — not only on Kaua'i, but globally, as PMRF supports the testing and export of weapons used in international conflict and genocide.	The Navy and NASA respect your concerns about addressing PMRF from mauka to makai. The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawai'i Revised Statutes Chapter 343) and the National Environmental Policy Act (NEPA). As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. The Navy and NASA respect your concerns regarding other military operations; however, the Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and	Ongoing Activities

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					alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0054	Shyanne Olores		6	I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS. We reject mitigation. We reject any expansion. We reject continued occupation. We demand that the United States: 1. End the lease. 2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste. 3. Restore sacred sites, including the dunes at Nohili. 4. Return all lands under PMRF to the rightful stewards — the Kanaka Maoli. PMRF is not defense. It is desecration. And we will not stand by while our ʻāina, our culture, and our families are poisoned in the name of war and profit. This is not America. This is Hawaiʻi. And the U.S. military must get out. Mahalo for receiving this testimony. I do not stand alone. Me ka ʻoiaʻiʻo, Shyanne Olores	1) Your opposition to the Proposed Action has been noted. 2) Please see response to comment #3 above for more information on the ongoing PFAS investigation and upcoming remedial investigation. There are no tanks with active fuel leaks at PMRF. As discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS, all hazardous waste produced on leasehold and easement lands is handled, managed, and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. 3) Your request to restore sacred sites, including the dunes at Nohili, are recognized. 4) The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. Your opposition to the presence of the U.S. military is recognized.	Cultural Practices
0054	Shyanne Olores		7	Written Testimony Opposing the Lease Renewal of PMRF Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi. I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our ʻohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciate the information you provided about your family lineage. Discussion of Cultural Practices may be found in Section 3.3 of the Final EIS.	General Opposition
0054	Shyanne Olores		8	Let me be absolutely clear: this is not America. These are stolen lands. Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied ʻāina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives.	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared in accordance with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Cultural Practices
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0054	Shyanne Olores		10	The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we've seen at Red Hill — and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future.	The Final EIS discloses general fuel tank locations (exact location cannot be provided for security reasons) and provides an extensive discussion on drinking water monitoring conducted at PMRF. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. Fuel storage tanks located on fee simple land are not analyzed in this EIS; however, aboveground storage tanks and underground storage tanks on fee simple land are disclosed in the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1.1.1.6 of that document, which is publicly available, and can be found on the EIS website (www.pmrf-kpgo-eis.com). Water quality monitoring programs are conducted at PMRF to test for the presence of PFAS and other contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Mānā Water Well) of the Water Resource section of the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Hazardous Materials and Waste
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0054	Shyanne Olores		12	I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS. We reject mitigation. We reject any expansion. We reject continued occupation. We demand that the United States: 1. End the lease. 2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste. 3. Restore sacred sites, including the dunes at Nohili. 4. Return all lands under PMRF to the rightful stewards — the Kanaka Maoli. PMRF is not defense. It is desecration. And we will not stand by while our ʻāina, our culture, and our families are poisoned in the name of war and profit. This is not America. This is Hawaiʻi. And the U.S. military must get out. Mahalo for receiving this testimony. I do not stand alone. Me ka ʻoiaʻiʻo, Shyanne Olores	1) Your opposition to the Proposed Action has been noted. 2) Please see response to comment #3 above for more information on the ongoing PFAS investigation and upcoming remedial investigation. There are no tanks with active fuel leaks at PMRF. As discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS, all hazardous waste produced on leasehold and easement lands is handled, managed, and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. 3) Your request to restore sacred sites, including the dunes at Nohili, are recognized. 4) The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. Your opposition to the presence of the U.S. military is recognized.	General Opposition
0055	Ronnie Inagaki		1	Aloha, Please accept the attached written testimony and reference appendix from myself, Ronnie Inagaki regarding the 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF), Mānā, Kauaʻi. My testimony details significant legal, environmental, and cultural concerns about the DEIS and requests that it be withdrawn or substantially revised. The testimony is accompanied by a reference list documenting cited evidence and supporting resources. Please confirm receipt of this submission. Mahalo for your attention and consideration. Sincerely, Ronnie Inagaki Attachments: 1. Written Testimony – Ronnie Inagaki – PMRF 2025 DEIS and Appendix – References & Supporting Evidence.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA have received your comment and note your opposition to the Proposed Action.	EIS Process
0055	Ronnie Inagaki		2	I submit this testimony in direct response to the 2025 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Navy and NASA regarding activities at the Pacific Missile Range Facility (PMRF) in Mānā, Kauaʻi. I find the DEIS incomplete, inadequate, and deeply flawed in both legal standing and cultural impact analysis. The proposed actions must be halted, and the DEIS withdrawn or significantly revised.	As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawaiʻi Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawaiʻi Revised Statutes Chapter 343. “The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application.” The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS.	EIS Process

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					Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the Cultural Impact Assessment (CIA). Appendix F contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment.	
0055	Ronnie Inagaki		3	**1. Legal Status of the Lands – Seized, Not Ceded** The DEIS repeatedly refers to the subject lands as "ceded." This classification is factually and legally false. These lands were seized without consent or lawful treaty of annexation and remain under illegal military control. The Hawaiian Kingdom was recognized as a sovereign nation by the U.S. and many other countries, and no lawful transfer of its national lands has ever occurred. Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S. Constitution's recognition of treaties as the supreme law of the land (Article VI). As recognized by U.S. Public Law 103-150 (the "Apology Resolution"), the overthrow of the Hawaiian Kingdom was illegal and occurred "without the consent of or compensation to the Native Hawaiian people or their sovereign government" (103rd Congress, 1993)[Appendix:1].	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0055	Ronnie Inagaki		4	**2. Failure to Adequately Document or Disclose Pollution Events** The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with verifiable, public-facing documentation: • **Perchlorate contamination** from solid rocket fuel used in missile launches and related propulsion testing is a well-known environmental hazard. The U.S. Environmental Protection Agency (EPA) identifies perchlorate as a threat to drinking water and human health, especially for pregnant women and children.[Appendix:3] • **PFAS contamination,** especially in light of the known airplane fire incident at PMRF in 2020, has been reported in "Toxic Foam from Military Fire Training Raises Concerns on Kaua'i" (Honolulu Civil Beat, 2021)[Appendix:2]. • The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials, are not adequately disclosed. Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?	The Final EIS discloses information on perchlorate testing at PMRF in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well). Although propulsion testing is outside the scope of this EIS, the Navy and NASA have provided a link below to a publicly available paper published by the U.S. Environmental Protection Agency (EPA), which found that perchlorate does not accumulate in soil or water, and that there were no significant differences in perchlorate concentrations in soil samples at testing ranges before or after firing missiles. This information can also be found in the 2025 Hawaii-California Training and Testing (HCTT) EIS/OEIS in Section 3.2 of that document. An online, pdf version of the paper published by the EPA can be found online at https://semspub.epa.gov/work/HQ/159615.pdf. Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the EPA screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF.	EIS Process

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					As discussed in Public Health and Safety (Section 3.9.1.4.4, Mākaha Ridge) of the Final EIS, a survey was conducted in 2020 to perform safety inspections on the hazards of electromagnetic radiation to personnel from radar operations. PMRF was granted a certification of compliance, and the survey found that PMRF was routinely implementing appropriate hazardous control measures. Due to these safety measures, the public is not exposed to any hazardous radiation. Effects from aerial and underwater testing are not included in the Proposed Action analyzed by this EIS. As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. Effects from testing and training activities were analyzed in previous PMRF National Environmental Policy Act (NEPA) documents and are presented in Table 1-5 of the Final EIS. These documents describe the mitigation measures already in place to reduce adverse effects from these activities. Effects from proposed changes to ongoing activities are analyzed in the 2025 HCTT Final EIS/OEIS and the 2025 PMRF Land-Based Training and Testing (LBTT) Final Environmental Assessment. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources, including threatened and endangered species, from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0055	Ronnie Inagaki		5	**3. Inadequate Cultural Impact Assessment** The cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including: • Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades, as documented by the State Historic Preservation Division (SHPD) and local practitioners[Appendix:4]. • Leina a ka ʻuhane (leaping places of the soul), which are located in proximity to PMRF training zones. • Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access. • Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity. Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "paʻakai analysis" (as required under Hawaiʻi's environmental review framework) cannot be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.	Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the Cultural Impact Assessment (CIA). Appendix F of the Final EIS contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment. All of the topics listed in this comment were discussed by CIA interview participants and are addressed in both the CIA and where appropriate to the proposed action, summarized in the EIS.	Cultural Practices
0055	Ronnie Inagaki		6	**4. Incomplete and Inadequate Analysis – Environmental and Procedural Deficiencies** This DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include: • No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors. • No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region.	Consistent with HAR section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4 (Cumulative Effects). Chapter 4 includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified.	Socioeconomics

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				• No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities, especially children living near military activity zones. • No generational impact assessment on future health, land use, or cultural restoration. This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory[Appendix:5,6,7].	Executive Orders 12898 and 14096 (which included a whole-of-government approach to Environmental Justice) were revoked on January 21, 2025; however, see Cultural Practices (Section 3.3), Socioeconomics (Section 3.6), Land Use and Access (Section 3.5) for relevant analyses in the Final EIS. Please see response to comment #5 above which addresses your concerns regarding cultural practices.	
0055	Ronnie Inagaki		7	**5. Conclusion and Demands** This land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestors. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us, it harms us, visibly and invisibly. **The Navy and NASA must:** 1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures. 2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments. 3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners. 4. Acknowledge the land as Hawaiian national land seized without consent and stop referring to it as "ceded." 5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established. Mahalo for your time. Know that this testimony is not only for today, but for the next seven generations. Ronnie Inagaki Email: rinagaki69@gmail.com	Thank you for sharing your connection to the land and your feelings about the activities at PMRF. In response to your list of demands, the Navy and NASA note: 1) The EIS has been prepared consistent with the current federal and State legal framework. 2) Please see response to comment #4 regarding perchlorate testing and future management of PFAS at the former firefighting site on leased lands. 3) Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the Cultural Impact Assessment. Appendix F contains the complete Cultural Impact Assessment, which uses the results of cultural consultation and archival research to address the topics listed in this comment. 4) The history of land tenure in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. 5) As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis)."	Cultural Practices
0055	Ronnie Inagaki		8	**Appendix: References & Supporting Evidence** **1. U.S. Public Law 103-150 (1993) ("Apology Resolution"):** Official acknowledgment by the U.S. Congress that the Hawaiian Kingdom was overthrown with the active participation of the United States, and that Native Hawaiians never relinquished claims to their inherent sovereignty or national lands. [Full Text: https://www.govinfo.gov/content/pkg/STATUTE-107/pdf/STATUTE-107-Pg1510.pdf] **2. PFAS Contamination:** "Toxic Foam from Military Fire Training Raises Concerns on Kaua'i." *Honolulu Civil Beat*, April 29, 2021. [https://www.civilbeat.org/2021/04/toxic-foam-from-military-fire-training-raises-concerns-on-kauai/] **3. Perchlorate in Drinking Water:** *U.S. Environmental Protection Agency (EPA) – Basic Information about Perchlorate in Drinking Water*. [https://www.epa.gov/sdwa/perchlorate-drinking-water] **4. State Historic Preservation Division (SHPD):** Reports and documentation on the presence and disturbance of iwi kūpuna in the Mānā dunes. [Contact: Hawai'i State Historic Preservation Division, https://dlnr.hawaii.gov/shpd/] **5. National Environmental Policy Act (NEPA):** Requires federal agencies to assess environmental effects, including cultural impacts and meaningful public input. [https://www.energy.gov/nepa/national-environmental-policy-act-nepa] **6. Hawai'i Revised Statutes Chapter 343:** Establishes Hawai'i's environmental review	Thank you for the provided references.	EIS Process

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				process and requirements for cultural impact assessment. [https://dlnr.hawaii.gov/occl/files/2013/08/HRS-343.pdf] **7. United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP):** Articles 18 and 32 affirm rights to consultation, free prior and informed consent, and protection of traditional lands. [https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html]		
0056	Kip Goodwin		1	Dear Ms. Ling, The Navy's draft Environmental Assessment in August 2024 proposed an acceleration of land based, multi-domain training and testing activities: Drone operations from two to 45 times annually. Troop maneuvers over land, from one to 22 times. Amphibious operations, four to 26. Helicopter and Osprey landing zone operations, four to 26. Operating, arming, and refueling for fighter jets, helicopters, planes and Ospreys, one to 20. These activities and more are proposed to be undertaken by all US military branches and include foreign militaries. This draft EIS does not comprehensively break down anticipated environmental impacts for these intensified activities based on the known accumulated impacts from decades of environmental degradations and cultural disruptions due to access restrictions. The EIS says that these proposed testing and training activities "were not being supported at other locations", which is another way of saying the Navy has designated Kaua'i to be the de facto repository for inevitable harmful environmental effects that have been rejected in protest by other islands.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to other EAs and EISs. However, impacts described in the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA are outside the jurisdiction and scope of this EIS. Resources topics analyzed in the 2025 PMRF LBTT Final EA are provided in Table 1-5 of the Final EIS. The EA is available on the EIS website at https://www.nepa.navy.mil/pmrflbttea/ Pacific Missile Range Facility Land-Based Training and Testing Final EA.	EIS Process
0056	Kip Goodwin		2	We have a particular concern that the MD-22 Osprey transport aircraft might gain a permanent presence on Kaua'i with this proposal that it participate in take off, landing and refueling exercises. The Osprey has an alarming history of crashing, causing the death of 62 service personnel since becoming operational in 2007. If one of these aircraft crashed on the flank of Mt Wai'ale'ale or in near shore water, it strains credulity to think that the military could or would clean up and thoroughly restore the crash site. Kaua'i's remote location on the map should exclude Kaua'i from being a deployment destination. Kaua'i enjoys for the most part an unspoiled natural environment but that is beset with challenges on several fronts. Whatever benefits can be derived from the actions proposed in this EIS are outweighed by the need to preserve the natural and economic benefits of, as the local saying goes, keeping Kaua'i Kaua'i. We prefer the No Action Alternative. Kip Goodwin Wailua Homesteads, Kaua'i	Please see response to comment #1 which addresses your concerns regarding ongoing testing and training. Your preference for the No Action Alternative has been noted.	Ongoing Activities
0057	Zac Appleton	EPA	1	William Manley Project Manager Naval Facilities Engineering Systems Command 400 Marshall Road Pearl Harbor, Hawai'i 96860 Subject: EPA Comments for the Draft Environmental Impact Statement for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Agreement, Kauai, Hawaii (CEQ# 20250083) Dear William Manley: The U.S. Environmental Protection Agency has reviewed the above-referenced document. We are providing comments pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508),	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	EIS Process

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				and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. It requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement and to make its comments public. The U.S. Navy and the National Aeronautics and Space Administration prepared a Draft Environmental Impact Statement to evaluate the potential environmental impacts of the proposed real estate agreements with the State of Hawai'i for the Pacific Missile Range Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO) project. The Navy proposes to retain the use of 8,172 acres of State lands on Kaua'i for operational continuity and sustainment of the PMRF, including military training, testing, and facility operations. The continued long-term NASA use of 23 acres of State lands would be in support of continued KPGO operations.		
0057	Zac Appleton	EPA	2	Review Summary The EPA provided scoping comments on June 17, 2024, with recommendations for the preparation of this DEIS, and we note those recommendations were fully adopted in the DEIS. The DEIS is primarily a disclosure document for a real estate action to be negotiated with the State of Hawai'i. EPA did not identify significant public health, welfare, or environmental quality concerns, and appreciates the robust cultural resource analysis and commitments made for Native Hawaiian communities accessing cultural practices in the project area. For your consideration, we recommend continuous coordination with the state and county to enhance shoreline resilience[1] in both the project area and coastline west of the Main Base.	Thank you for your comment and for recognition that the U.S. Environmental Protection Agency (EPA) recommendations during the scoping phase of the project were fully adopted in the Draft EIS. PMRF and KPGO appreciate EPA's engagement in this process. The Navy coordinates with State and federal agencies on a regular basis, and provides many of these agencies opportunity to provide input on the PMRF Integrated Natural Resources Management Plan, which outlines natural resource management actions and goals across the installation, including along the shoreline of Main Base.	Water Resources
0057	Zac Appleton	EPA	3	The EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please notify use and make an electronic version available. If you have any questions, please contact me at (415) 947-4167 or contact Zac Appleton, the lead reviewer for this project, at (415) 972-3321 or appleton.zac@epa.gov. Sincerely, Jean Prijatel Branch Manager cc: Shari Miller National Aeronautics and Space Administration Footnote 1: U.S. Army Corps of Engineers, Engineering With Nature website. Available: https://ewn.el.erdc.dren.mil	The EPA is included on the distribution list for notification of the Final EIS. Electronic copies of the Final EIS are available on the State of Hawai'i's Office of Planning and Sustainable Development, Environmental Review Program's website and the EIS website (www.pmrf-kpgo-eis.com).	EIS process
0058	Elizabeth Ullman		1	Please do NOT renew or apply to renew military leases on Kaua'i! Let us try to salvage what we can of our planet, and stop doing damage. As a Navy "brat" I have seen the damage done by our military when I lived on Guam, many visits to Hawai'i, and on Wake Island. It needs to stop. Thank you. Elizabeth Ullman California	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. The Navy and NASA respect your concerns in regard to Navy and military operations.	General Opposition
0059	Therese Eke		1	Stop the U.S. Navy and NASA from ANY leases on Hawaiian land, including Kuaui. The ONLY thing the U.S. Navy and NASA should be doing is remediating the damage they have already done. Stop the militarization, the environmental racism and the trampling of Kanaka Maoli. Preserve what's left of the wildlife, land, water and air before it is too late. As a concerned taxpayer, citizen, and human living on the earth, Therese Eke	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA respect your concerns in regard to Navy and military operations. Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS describes the potential steps that would take place if the new real estate agreements for leases and easements are not granted to the Navy and NASA after their expiration. Pursuant to the terms of the current real estate agreements, at the expiration of the leases and easements, any return of State property would involve complex negotiations and collaboration with the State to determine the condition of the returned lands and address clean-up activities.	General Opposition

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					As described in Section 3.4 (Biological Resources) and Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. The State of Hawai'i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/). Please feel free to provide feedback regarding military occupation in Hawai'i.	
0060	Virginia Feldman		1	Dear Ms, Ling, and the Pacific Missile Range Facility/Koke'e Park Geophysical Observatory: Justice requires that the U.S. Navy and NASA **NOT** get a new 30-year lease for the over 8,000 acres of stolen Hawaiian lands on Kaua'i. They've occupied these lands for decades at the Pacific Missile Range Facility (PMRF) and Kōke'e Park Geophysical Observatory (KPGO).	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. The Navy and NASA respect your concerns in regard to the Navy and NASA's activities on leasehold and easement lands located at PMRF and KPGO. Under Alternative 1, the Navy and NASA would apply to Department of Land and Natural Resources (DLNR) for new real estate agreements as required by DLNR, for a minimum duration of 25 years up to a maximum duration as negotiated with DLNR, and for the same uses as the current leases and easements. The Navy would not pursue new real estate agreements for easements B-1 and B-2 under the action alternatives as these were temporary construction permits granted in 1977 and are no longer needed. Historical use of lease and easement lands at PMRF and KPGO by the Navy and NASA are discussed in Historic Land use at PMRF (Section 1.3.1) and Historic Land use at KPGO (Section 1.3.2) of the Final EIS.	Land Use and Access
0060	Virginia Feldman		2	Their recently released Draft Environmental Impact Statement (EIS) fails to account for the full scope of harm to 'āina (land and waters), including: • Ongoing damage to land, water, and ocean ecosystems • Threats to endangered species and sacred sites • Lack of analysis on climate change impacts or long-term community health • Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration	The Navy and NASA respect your concerns regarding natural ecosystems, cultural sites, climate change, and public health. Responses to your concerns are addressed below. Impacts to water resources within the region of influence include groundwater, surface water, floodplains, and wetlands. Existing conditions of these water resources, as well as potential environmental impacts from the Proposed Action and Action Alternatives, are discussed in detail in the Final EIS in Water Resources (Section 3.7). This section includes a list of best management practices and standard operating procedures for water resource management (Table 3.7-2). Threats to endangered species are discussed in Biological Resources (Section 3.4.1, Affected Environment and 3.4.2, Environmental Consequences) of the Final EIS. Threats are discussed in multiple sections in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) (Appendix K of the Final EIS). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As discussed in Environmental Management and Protection (Section 1.3.6) and Biological Resources (Section 3.4) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land	Biological Resources

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					uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. As described in Archaeological and Architectural Resources (Section 3.2) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Cultural Practices (Section 3.3.2, Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. In order to support analysis for the BLNR as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources, including threatened and endangered species, from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0060	Virginia Feldman		3	This is about continued militarization, environmental racism, and the denial of Kanaka Maoli sovereignty. We friends of Kanaka Maoli demand: No new leases. Accountability for environmental and cultural harm. Comprehensive cleanup and restoration, and Return of 'āina to Kanaka Maoli THANK YOU for your attention, Virginia Feldman	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to biological and cultural resources. These resources are described in Sections 3.2 (Archaeological and Architectural Resources) through 3.4 (Biological Resources) of the Final EIS.	Cultural Practices
0061	Kaleiheana-a-Pōhaku Stormcrow		1	Aloha mai kākou, I am writing to urge you to deny new military leases for the Pacific Missile Range Facility (PMRF) and Kōke'e Geophysical Observatory. The Draft EIS does not account for the full scope of environmental and cultural harm: threats to endangered species, sacred sites, climate change impacts (which are likely significant), or health consequences for nearby communities. Please take this opportunity to take accountability for cultural and environmental harm, fully restore the land, cleanup the mess, and return this land to Kānaka for stewardship.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns regarding natural ecosystems, cultural sites, climate change, and public health. Responses to your concerns are addressed below. Threats to endangered species are discussed in Biological Resources (Section 3.4.1, Affected Environment and 3.4.2, Environmental Consequences) and in multiple sections in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP)	General Opposition

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					(Appendix K) of the Final EIS. The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As discussed in Environmental Management and Protection (Section 1.3.6) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. As described in Archaeological and Architectural Resources (Section 3.2) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Cultural Practices (Section 3.3.2, Environmental Consequences) summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	
0061	Kaleiheana-a-Pōhaku Stormcrow		2	These lands are stolen. As a Kanaka ʻŌiwi, I do not consent to the continued desecration of ʻāina, ancestors, and communities (people, plant, animal). Mahalo for your time and the opportunity to submit testimony. ke aloha, -- Kaleiheana-a-Pōhaku Stormcrow	The Navy and NASA acknowledge your opposition to the Proposed Action.	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Master of Science Department of Natural Resources and Environmental Management University of Hawai'i Mānoa pronouns: they/them		
0062	Kaleiheana-a-Pōhaku Stormcrow		1	Aloha mai kākou, I am writing to urge you to deny new military leases for the Pacific Missile Range Facility (PMRF) and Kōke'e Geophysical Observatory. The Draft EIS does not account for the full scope of environmental and cultural harm: threats to endangered species, sacred sites, climate change impacts (which are likely significant), or health consequences for nearby communities. Please take this opportunity to take accountability for cultural and environmental harm, fully restore the land, cleanup the mess, and return this land to Kānaka for stewardship.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns regarding natural ecosystems, cultural sites, climate change, and public health. Responses to your concerns are addressed below. Threats to endangered species are discussed in Biological Resources (Section 3.4.1, Affected Environment and 3.4.2, Environmental Consequences) and in multiple sections in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) (Appendix K) of the Final EIS. The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As discussed in Environmental Management and Protection (Section 1.3.6), and Biological Resources (Section 3.4) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. As described in Archaeological and Architectural Resources (Section 3.2) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Cultural Practices (Section 3.3.2, Environmental Consequences) summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	
0062	Kaleiheana-a-Pōhaku Stormcrow		2	These lands are stolen. As a Kanaka ʻŌiwi, I do not consent to the continued desecration of ʻāina, ancestors, and communities (people, plant, animal). Mahalo for your time and the opportunity to submit testimony. ke aloha, -- Kaleiheana-a-Pōhaku Stormcrow Master of Science Department of Natural Resources and Environmental Management University of Hawai'i Mānoa pronouns: they/them	The Final EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	General Opposition
0063	Sarah Westwind		1	No new leases Accountability for environmental and cultural harm Comprehensive cleanup and restoration Return of ʻāina to Kanaka Maoli Respectfully, Sarah Westwind	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to biological and cultural resources. These resources are described in Sections 3.2 (Archaeological and Architectural Resources) through 3.4 (Biological Resources) of the Final EIS. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS.	Action Alternatives
0064	Edward Tripp		1	The US Navy has a solid record of environmental damage, pretty much wherever it goes and does what it wants to do. There is nothing good that can come of the US Navy's continued presence in Hawaii, not as long as it acts without regard for the external world.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws and Regulations), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. Environmental Management and Protection (Section 1.3.6) highlights some of the many PMRF and Navy-specific long-term resource protection activities that occur on leased and easement lands at PMRF and KPGO. Some of these include maintaining an ungulate exclusion fencing for erosion control at Mākaha Ridge, outplanting and managing native plants in areas identified as having erosion and soil compaction issues, improving habitat for federally endangered plant and invertebrate species, enacting management actions to reduce risk of wildfire, and coordination with State and federal entities to implement management actions for endangered birds. In 2024, the Department of Defense Readiness and Environmental Protection Integration (REPI) program awarded $4.85 million dollars to natural resource conservation projects on Kaua'i. Another $1.5 million dollars is expected in 2025. In 2023, approximately $26.7 million REPI dollars were awarded for projects in Hawai'i overall. More information about these programs is included in the Final EIS in Table 1-4. As discussed in Section 3.9 (Socioeconomics) of the Final EIS, according to analysis by the Navy Region Hawaii Public Affairs (2024), PMRF contributes approximately $150 million annually in salaries, contract goods, and services to the local economy. The Navy also remains an active participant in management of water resources in West Kaua'i as highlighted in Section 3.7 (Water Resources) of the Final EIS. The Navy supports the County of Kaua'i Fire Department and responds to medical and wildfire-related emergencies outside of PMRF. PMRF has also assisted the community during natural disasters and provided services and supplies to the community after	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					hurricanes, as well as providing power to critical infrastructure to West Kaua'i during an electricity blackout due to a large wildfire. PMRF has a strong relationship with stakeholders and the community and is viewed as a good neighbor and community partner, and is committed to maintaining those relationships.	
0065	Bruce Wade		1	In light of the environmental damage and ongoing disruption of the habitats and flora, I oppose any continued use of the Kaua'i lands for military tests and operations. Kaua'i is considered one of the most unspoiled and natural islands and every effort should be to retain and recover its lands to their natural balance of flora and fauna.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to military operations and note your opposition to the Proposed Action. As described in Section 3.4 (Biological Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. The 2023 PMRF INRMP is located in Appendix K of the Final EIS. As discussed in Environmental Management and Protection (Section 1.3.6) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Prog ram which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities.	Biological Resources
0066	Riyaana Hartley		1	This lease should be terminated and never renewed. This land was stolen and misused, leaving the land, ocean, animals and native people significantly harmed. No agenda is worth the continued damage and desecration of the natural inhabitants. This is an opportunity to do the right thing, make amends and set balance into motion. If not, the misguided, malicious and egotistical objectives of the US govt etch a legacy of pure destruction and disregard for life into eternity.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns regarding historic use of this land. At this time the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. Best Management Practices are policies, practices, and measures the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes. These actions, along with conservation measures associated with the Proposed Action, are discussed in detail in Section 2.5 (Best Management Practices) of the Final EIS. Table 2-7 lists Standard Operating Procedures from the Integrated Cultural Resources Management Plan (ICRMP) and resource management strategies from the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) (Appendix K) of the Final EIS. The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Action Alternatives

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0067	Joshua Reichek		1	Please --- No new leases Please provide accountability for environmental and cultural harm Please provide a plan and time line for comprehensive cleanup and restoration Please provide time line for the return of ʻāina to Kanaka Maoli	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The EIS was prepared in accordance with NEPA and HEPA and provides a comprehensive analysis of potential environmental impacts resulting from the Proposed Action using best available science. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to biological and cultural resources. These resources are described in Archaeological and Architectural Resources (Section 3.2) through Biological Resources (Section 3.4) of the Final EIS.	Action Alternatives
0068	Patti Gmeiner		1	These are not my own words, but I agree with them: The Draft EIS fails to account for the full scope of harm to ʻāina (land and waters), including: Ongoing damage to land, water, and ocean ecosystems Threats to endangered species and sacred sites Lack of analysis on climate change impacts or long-term community health Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration. Please: -- No new leases -- Accountability for environmental and cultural harm -- Comprehensive cleanup and restoration -- Return of ʻāina to Kanaka Maoli	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The EIS was prepared in accordance with NEPA and HEPA and provides a comprehensive analysis of potential environmental impacts resulting from the Proposed Action using best available science. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to biological and cultural resources. These resources are described in Sections 3.2 (Archaeological and Architectural Resources) through 3.4 (Biological Resources) of the Final EIS. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources, including threatened and endangered species, from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0069	Alvin Deer		1	The state already recognized that it was stolen land in 1996 when they canceled the 100th anniversary of occupation of Hawaii. The native Hawaiians have never given up their sovereignty and we must support their rights to the sacred land	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Land Use and Access
0070	Lauren Johnson		1	The DEI does not sufficiently cover ongoing damage to land, water, and ocean ecosystems or threats to endangered species and sacred sites. This includes continued desecration and occupation of indigenous Kānaka Maoli lands without return, reparations, or restoration. Nor does the DEI sufficiently analyze the impacts on climate change or long-term community health.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. Water Resources within the Region of Influence include groundwater, surface water, floodplains, and wetlands as discussed in Water Resources (Section 3.7). This section includes a list of best management practices and standard operating procedures for water resource management (Table 3.7-2). Threats to endangered species are discussed in Biological Resources (Section 3.4.1, Affected Environment and 3.4.2, Environmental Consequences) of the Final EIS. Threats are discussed in multiple sections in the 2023 PMRF Integrated Natural	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					Resources Management Plan (INRMP) (Appendix K of the Final EIS). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As described in Archaeological and Architectural Resources (Section 3.2) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Cultural Practices (Section 3.3.2, Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources, including threatened and endangered species, from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0071	Gabrielle Holt		1	I am writing to express my complete opposition to the continued use of state lands on Kaua'i for the Pacific Missile Range Facility (PMRF). As a Native Hawaiian, I oppose it on spiritual and cultural grounds, and as a human being invested in a livable future for generations to come, I oppose it on the grounds that the military has never, in the history of Hawai'i, been a responsible steward of the lands they have leased and abused for over 100 years. From Pu'uloa, to Pohakuloa, to Kaho'olawe and beyond - how much more can our island home take? The lack of transparency regarding the Red Hill water crisis eroded what was already a tenuous trust (at best), while the proposed "boosting of training" at Ka'ula demonstrates a willful disrespect for all facets of life in Hawai'i.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill, Kaho'olawe, Pōhakuloa, Ka'ula Island, Pu'uloa, and other military areas are outside the jurisdiction and scope of this EIS. In a process separate from this EIS, the State of Hawai'i published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/).	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					As stated in Project Introduction and Overview (Section 1.1) of the Final EIS, Navy training and testing operations do not occur on the State lands in the Project Area nor are they part of the Proposed Action analyzed in this EIS.	
0071	Gabrielle Holt		2	On July 23rd, the International Court of Justice "ruled that States have an obligation to protect the environment from greenhouse gas (GHG) emissions and act with due diligence and cooperation to fulfill this obligation." A continued military presence, with all the pollution it brings with it, flies in the face of this ruling. The US military is one of the biggest sources of carbon emissions in the world (estimated to be about 3,685 Million Metric Tons of CO2 equivalent in November 2024). This, along with the other damaging aspects of a military presence (water pollution, noise pollution, radiation, etc.) are not conducive to a sustainable environment. In the context of Hawai'i, the "extinction capital of the world", this is particularly damning.	The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix C, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. The Navy strives to balance military readiness with long-term resource protection. As described in Section 3.4 (Biological Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Natural Resources Management Plan (INRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. The Navy has been collaborating with stakeholders on water resource management in west Kaua'i as a committed partner in a two-decade water quality monitoring project in the Mānā Plain to test for pollutants. The Navy has worked with Agribusiness Development Corporation (ADC) to allow access for water quality monitoring at several outfalls located on Navy fee simple land since the inception of the most recent program and works closely with other partners involved in the project. Tests for the presence of pesticides, heavy metals, and hydrocarbons have been conducted and all ADC Mānā Plain water quality monitoring data since September 2020 is publicly available on the ADC website (https://dbedt.hawaii.gov/adc/manaplain/). In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-5 includes the establishment of a Navy-Department of Land and Natural Resources-Department of Hawaiian Home Lands-Kekaha Agricultural Association-ADC-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i. The Navy and NASA respect your concerns regarding carbon emissions. As discussed in Section 3.10.2.2 (Air Quality and Greenhouse Gases/Alternative 1: Succeeding Current Real Estate Agreements) of the Final EIS, the continued production of similar levels of Greenhouse gases (GHG) at PMRF would not meaningfully contribute to global GHG levels and associated environmental changes.	Air Quality and Greenhouse Gases
0071	Gabrielle Holt		3	As an educator, I am deeply invested in the future that my beloved students will inherit. What kind of world do I want them to emerge into? What kind of caretaker would I be if I did not speak up for them and their 'āina? It is with the deepest love for them, and my home, that I must fervently oppose any continued use of the land on Kaua'i by the US Military. As George Helm once said: "What is national defense when what is being destroyed is the very thing the military is being entrusted to defend, the sacred land?" As a Hawaiian, I have been entrusted with the kuleana to speak up for my 'āina and for those future generations from whom we are borrowing it, a hiki i ka aloha 'āina hope loa. I thank you for your time and consideration.	The Navy and NASA respect the concern you feel for your students, and your opposition to the Proposed Action is noted.	Land Use and Access
0072	Beth Goodson		1	The Draft EIS fails to account for the full scope of harm to 'āina (land and waters), including: Ongoing damage to land, water, and ocean ecosystems Threats to endangered species and sacred sites Lack of analysis on climate change impacts or	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				long-term community health Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration This is not just about environmental review. It is about continued militarization, environmental racism, and the denial of Kanaka Maoli sovereignty.	Water Resources within the ROI include groundwater, surface water, floodplains, and wetlands as discussed in Water Resources (Section 3.7) of the Final EIS. This section includes a list of best management practices and standard operating procedures for water resource management (Table 3.7-2). Threats to endangered species are discussed in Biological Resources (3.4.1 and Section 3.4.2, Environmental Consequences) of the Final EIS. Threats are discussed in multiple sections in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) (Appendix K of the Final EIS). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As described in Archaeological and Architectural Resources (Section 3.2) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Cultural Practices (Section 3.3.2, Environmental Consequences) summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in (Appendix F) of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources, including threatened and endangered species, from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0073	Sharon Furlong	Bucks Environmental Action	1	It seems that accumulating effects, especially in the world of environmental analysis, never seem to take the lead .indeed, it rarely seems Ro get a seat at the table at all. This project not only does not take into consideration any harms that have already	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Environmental effects from the Proposed Action are discussed by resource in Chapter 3 (Affected Environment and Environmental Consequences) in the	EIS Process

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				been done, and will continue to be done, to the air, water and soil in this fragile area, it seems to be dismissive of the issue at all. To be expected, but infuriating, and deadly, nevertheless. In addition , there is the small consideration of the continuing desecration of sacred lands, along with once again, the dismissal of the Indigenous People for whom these lands are sacred. Hmmm…I wonder what wouls happen if St. Patrick's Cathedral was slated to be occupied and explored for mining?? The racism is palpable.	Final EIS. A list of the resources analyzed and the regions of influence are provided in Table 3.1-3 in the Final EIS, and includes cultural practices, air quality and greenhouse gases, archaeological and architectural resources, water resources, and hazardous materials and waste. Chapter 4 (Cumulative Effects) of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions.	
0074	Brandon Trelstad		1	I'm writing with concerns about the US government (Navy and NASA) seeking new leases for over 8,000 acres of stolen Hawaiian lands at the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO). The Draft Environmental Impact Statement (DEIS) fails to assess the full scope of harm to land, water, ocean, endangered species, sacred sites, address climate change, and the human health. One of a kind habitats are harmed by rocket launches that ignite vegetation, amphibious assaults that disturb the shoreline, and warships and sonar that disrupt fragile ocean ecosystems.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS. Rocket launches, amphibious assaults, and the operation of sonar by warships are not included in the Proposed Action analyzed by this EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS /Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources
0074	Brandon Trelstad		2	The Navy refuses to promise cleanup. The DEIS admits that cleanup is "unknown" and instead says they'll "negotiate" with the state, leaving toxic waste, landfills, unexploded ordinances, and abandoned military structures to desecrate the land indefinitely. Please do not allow these activities on land that belongs to and has been cared for by the Hawaiian people. This is stolen land that should be protected and left to Hawaiian management.	The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3 (Alternatives Carried Forward for Analysis/Alternative 3: No Action Alternative) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. The Navy plans to continue to work with PMRF Kauaʻi to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community, as discussed in Section 5.2 (Existing and Continuing Mitigation Measures and Proposed Enhanced Engagements/Proposed Enhanced Engagements) of the Final EIS. PMRF Kauaʻi will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kauaʻi website can be found here, https://pmrfkauai.com/.	Hazardous Materials and Waste
0075	Regina Gregory		1	Adding the words "real estate" does not eliminate the far-reaching harms caused by operating a missile test facility. Please choose the "no action" alternative. Regina Gregory	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Your preference for the No Action Alternative is noted. Real estate reflects the discretionary action that the Navy and NASA seek from the Board of Land and Natural Resources. The Final EIS includes a description of effects from ongoing	Action Alternatives

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					activities on State land in Table 3.1-4 of the Final EIS and Table 1-5 of the Final EIS includes a list of previous PMRF National Environmental Policy Act documents.	
0076	Shannon Sitzler		1	Ms. Kerry Ling, I am dis hearted to hear about the new lease of land the military stole out right from the Kauai residents. This land should be classed as kapu. It is sacred land that should only be utilized for the public. Our community demands no new leases and a full cleanup and restoration to the land.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns regarding the Navy and NASA's activities on leasehold and easement lands located at PMRF and KPGO. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The Final EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5, (Land Use and Access) in the Final EIS. Section 2.3.3 (Alternative 3: No Action Alternative) of the Final EIS describes the potential steps that would take place if the new real estate agreements for leases and easements are not granted to the Navy and NASA after their expiration. Potential effects from this alternative are described under each resource section in Chapter 3.	Land Use and Access
0077	Denver West		1	Aloha Kakou, I am writing to express my strong opposition to the proposed new leases and to voice my deep concern regarding the Draft Environmental Impact Statement (EIS) for the Pacific Missile Range Facility (PMRF) and KPGO. The Draft EIS fails to fully address the environmental, cultural, and health harms that have long impacted the land, ocean, and communities of West Kaua'i. It overlooks the damage to endangered species and sacred sites, and completely omits analysis of climate change, long-term health consequences, and cumulative impacts on Native Hawaiian lands.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes (HRS) Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1 and has been prepared in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS.	Cumulative Effects
0077	Denver West		2	I urge you to: • Deny any new leases • Acknowledge and address the environmental and cultural harm • Commit to full cleanup and restoration • Return 'āina to Kānaka Maoli Mahalo for your time and consideration. Sincerely, Denver West 96815	Your opposition to the Proposed Action is noted. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with HAR Chapter 11-200.1, the rules implementing HRS Chapter 343. The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: NEPA (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS.	Land Use and Access
0078	Georgia Anders		1	Due to the climate changes effects and the distraction of Hawaiian land I sign this.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. A map showing the 3.2-foot sea level rise scenario is included in Predictable Environmental Trends (Section 3.1.2) of the Final EIS, and predictable environmental trends (including sea level rise) are discussed in each resource section.	Air Quality and Greenhouse Gases
0079	Julie Morcate		1	The Draft EIS fails to account for the full scope of harm to 'āina (land and waters), including: Ongoing damage to land, water, and ocean ecosystems Threats to endangered species and sacred sites Lack of analysis on climate change impacts or long-term community health Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration Please stop the militarization, environmental racism, and the denial of Kanaka Maoli sovereignty.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. Water Resources within the ROI include groundwater, surface water, floodplains, and wetlands as discussed in Section 3.7 (Water Resources) in the Final EIS. This section includes a list of best management practices and standard operating procedures used for water resource management (Table 3.7-2).	Biological Resources

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					Threats to endangered species are discussed in Biological Resources (Section 3.4.1.4, Affected Environment and Section 3.4.2, Environmental Consequences) of the Final EIS. As described in Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Section 3.3.2 (Cultural Practices/Environmental Consequences) in the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0080	Kahakuhailoa Poepoe		1	I strongly oppose the U.S. Navy's request to extend their lease at the PMRF also known as Barking Sands on the West Side of Kaua'i. This lease violates multiple laws and statutes protecting Native Hawaiian rights that the U.S. Federal government is required to uphold and maintain, including but not limited to, gathering rights, cultural access rights, and the Federal Government's requirement to consult with Native Hawaiian communities before undergoing any projects in Hawai'i. Nōhili, as this place is traditionally known as in the Hawaiian language, holds significant importance as expressed in hundreds of Hawaiian songs and chants which can be found in the Papakilo Database's Hawaiian Newspaper Collection, as well as mentions in traditional mo'olelo and stories in said sources and found in various oral traditions. It is vital that Native Hawaiians have cultural access to Nōhili, and that the U.S. military clean up the mess it has already made at Nōhili. Me ke aloha pumehana, na Kahakuhailoa	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA acknowledge your opposition to the Proposed Action. The EIS has been prepared consistent with the current federal and State legal framework, including laws and regulations that protect traditional native Hawaiian rights. Please see Section 1.6 (Relevant Laws and Regulations) in the Final EIS for the relevant laws and regulations used to prepare the Final EIS, Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) for ongoing coordination with native Hawaiians local to Mānā and Waimea, Section 3.3.1.2 (Cultural Practices/Regulatory Setting) for laws and rules used to prepare the Cultural Impact Assessment (which you can find in Appendix F), and the Department of Land and Natural Resources Ka Pa'akai Analysis, and Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS for a summary of cultural impacts.	Cultural Practices

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					At PMRF, coordination of access for cultural practices, including access to Nohili, is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations indicated by restricted area signage. Table 5.2-1 includes a summary of PMRF's proposal to develop an access management plan to streamline access for cultural practitioners (listed as Enhanced Engagement-2).	
0081	Joell Edwards	Wainiha Country Market Inc	1	Please see my public testimony	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	EIS Process
0081	Joell Edwards	Wainiha Country Market Inc	2	Naval Facilities Engineering Systems Command, Environmental OPHEV2 Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling 400 Marshall Road, Building X-11 Pearl Harbor, HI 96860 My name is **Joëll M. Edwards**, and I am a resident of **Wainiha, Kaua'i**. I respectfully submit the following testimony in response to the Draft Environmental Impact Statement (DEIS) regarding the continued military use of public lands at the Pacific Missile Range Facility (PMRF) and KPGO. As a resident of Kaua'i,, I am deeply concerned about the cumulative environmental, cultural, and social impacts that have been inadequately addressed in the DEIS. The current draft omits critical data, avoids clear accountability, and fails to offer meaningful community benefits or restoration.	Please see the individual responses to each of your key areas of concern.	Socioeconomics
0081	Joell Edwards	Wainiha Country Market Inc	3	**Key Areas of Concern:** • **Fuel Storage & PFAS:** The DEIS confirms the presence of fuel storage and historic PFAS use but lacks transparency on quantities, compliance records, or cleanup plans. This echoes the crisis at Red Hill. I urge the Navy to disclose storage volumes, conduct complete PFAS investigations, and implement emergency response protocols.	Fuel storage and per- and polyfluoroalkyl substances (PFAS) are discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS. Information on these topics has been summarized below. Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. As discussed in Water Resources (Section 3.7), the Navy and NASA implement best management practices and standard operating procedures for the	Hazardous Materials and Waste

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					protection of groundwater resources within the ROI. The Final EIS describes these processes, including soil testing conducted during decommission of underground fuel storage tanks, in more detail in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS. The PMRF Spill, Prevention, Control and Countermeasures Plan includes a detailed spill prevention and emergency response plan. The Plan serves as a mechanism to ensure that all response personnel are adequately prepared to respond to a release of oil or hazardous substance that require an emergency response and contains the immediate procedures to be carried out by facility personnel once a discharge is detected or emergency incident is reported. This response, including coordination with State and County emergency agencies, is discussed in Public Health and Safety (Section 3.9.1.4.1, Main Base) in the Final EIS. The EIS website (www.pmrf-kpgo-eis.com) also contains a copy of the Occupational Health and Safety spill flowchart, detailing instructions in the event of an unintended spill. This Plan in its entirety contains sensitive information and is not publicly available.	
0081	Joell Edwards	Wainiha Country Market Inc	4	• **Stormwater & Landfill Runoff:** The DEIS acknowledges pollution concerns near the Mānā Plain drainage ditches, yet disclaims responsibility. If PMRF operates adjacent to discharge points, it must partner with the County and State for full water quality monitoring and cleanup.	The Navy has been collaborating with stakeholders on water resource management in west Kaua'i as a committed partner in a two-decade water quality monitoring project in the Mānā Plain to test for pollutants. The Navy has worked with Agribusiness Development Corporation (ADC) to allow access for water quality monitoring at several outfalls located on Navy fee simple land since the inception of the most recent program and works closely with other partners involved in the project. If you are interested in learning more about the monitoring program or want to see test results, all ADC Mānā Plain water quality monitoring data since September 2020 is publicly available on the ADC website (https://dbedt.hawaii.gov/adc/manaplain/). The landfill in Kekaha is managed by the County of Kaua'i, and therefore, any management actions associated with runoff from the landfill are outside the jurisdiction of this EIS. However, Table 3.7-2 outlines the Best Management Practices and Standard Operating Procedures that are utilized by the Navy and ADC in water resource management on leasehold and easement lands, including the management of surface water quality. Also discussed in Section 3.7 of the Final EIS are the Nohili and Kawai'ele Pump stations, located on leasehold lands at Main Base, which have historically been used to lift water from the lower-lying portions of the Mānā Plain over the coastal dunes. The Navy manages these stations, and has worked with ADC to equip the drainage ditches at the Nohili and Kawai'ele Pump Stations with stormwater pollution control measures such as the use of polyvinyl chloride screens to trap drifting debris and subsurface pipes that prevent discharge of floating debris or oily substances for when the pumps are in use. A National Pollutant Discharge Elimination System permit has been issued to ADC and County of Kaua'i to cover discharge points from the Mānā Plain drainage system. The permit identifies seven outfall sites; three of the seven are located on Navy fee simple land. The Navy will work with ADC and the County of Kaua'i to comply with the permit. This permit is discussed in more detail in Section 3.7.1.4.2.6 (Water Resources/ Surface Water Quality) of the Final EIS. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-5 includes the	Water Resources

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					establishment of a Navy-Department of Land and Natural Resources-Department of Hawaiian Home Lands-Kekaha Agricultural Association-ADC-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i.	
0081	Joell Edwards	Wainiha Country Market Inc	5	• **Unexploded Ordnance (UXO):** There is no plan for proactive removal or community safety despite admitted UXO risks. A full risk map and a public safety plan should be required before lease renewal.	There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land. Recently, during an infrastructure upgrade project conducted on Barking Sands, it was determined that a full Explosive Safety Submittal was required in the project area (over 7 miles of area), and several pieces of munitions and explosives of concern were located and disposed. The Navy takes the health and safety of the public seriously, and the Final EIS includes the safety measures that minimize any risk to the public in Public Health and Safety (Section 3.9).	Public Health and Safety
0081	Joell Edwards	Wainiha Country Market Inc	6	• **Ka'ula Island & RIMPAC:** The continued bombing of Ka'ula Island, a sacred and ecologically sensitive site, is unacceptable. RIMPAC activities likewise cause measurable harm to marine mammals and ocean ecosystems. These actions are incompatible with Hawai'i's cultural and environmental values.	The Navy and NASA respect your concerns related to Ka'ula Island. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the 2025 PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. The Rim of the Pacific (RIMPAC) exercise are outside the jurisdiction and scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. Effects to marine resources from the Navy's offshore ongoing activities were analyzed in previous PMRF National Environmental Policy Act (NEPA) documents and are presented in Table 1-5 and also discussed in detail in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/OEIS and the 2025 PMRF LBTT Final EA. Both NEPA documents are available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0081	Joell Edwards	Wainiha Country Market Inc	7	• **Wetlands & Restoration:** The Navy offers no commitment to restore wetlands near PMRF despite degraded conditions. Other former military sites across the U.S. have successfully transitioned into conservation and community spaces—Kaua'i deserves the same.	The Navy is restoring wetlands at PMRF. Restoration projects in the Project Area include restoration of the Mānā Plain to wetlands (Table 4.1-1 of the Final EIS) and native outplanting restoration efforts (Section 3.4.1 of the Final EIS, Biological Resources/Affected Environment). These activities are also described in Section 4.1.2 of the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) in Appendix K of the Final EIS. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities.	Biological Resources
0081	Joell Edwards	Wainiha Country Market Inc	8	• **Biosecurity & Invasive Species:** The DEIS lacks any formal plan for Coconut Rhinoceros Beetle (CRB) monitoring or mitigation. This omission places our native and cultural plants at grave risk. A dedicated biosecurity program must be included.	As discussed in Section 3.4.1.4 (Biological Resources/Existing Conditions) of the Final EIS, coconut rhinoceros beetle (CRB) management on PMRF consists of extensive control measures, such as weekly pheromone trap checking, monthly advanced tree monitoring and inspections, covering of green waste with netting, and treatment of every potentially affected tree with a foliar spray. The Navy and NASA will continue to collaborate on management actions with Kaua'i Invasive Species Committee (KISC), the CRB Hawai'i Response Team, Division of Forestry and Wildlife (DOFAW), Department of Agriculture and Biosecurity (DAB), and Naval Facilities Engineering	Biological Resources

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					Systems Command (NAVFAC). More information regarding CRB can be found in Section 4.1.3 of the 2023 PMRF INRMP (Appendix K of the Final EIS). The Navy has plans to develop a PMRF Biosecurity Plan that includes specific prescriptions to evaluate individual invasive species, to identify targeted species, to control further spread of those targeted species, and to develop and implement a program to monitor invasive species abundance. The plan will be coordinated with the Regional Biosecurity Plan for Micronesia and Hawai'i (Section 4.1.3 of the 2023 PMRF INRMP in Appendix K of the Final EIS).	
0081	Joell Edwards	Wainiha Country Market Inc	9	• **Housing & Displacement:** The DEIS ignores the impacts of military presence on housing availability and affordability. Service member housing allowances are outpacing local incomes, displacing families and weakening community stability. The Navy must address this through land return and investment in local housing solutions.	The Navy and NASA respect your concerns regarding housing affordability on Kaua'i. As described in Section 2.1 (Proposed Action) of the Final EIS, the Proposed Action does not include the construction of any new housing. The distribution of military and civilian personnel and their dependents would continue to be more heavily concentrated in West Kaua'i due to the proximity to PMRF.	Socioeconomics
0081	Joell Edwards	Wainiha Country Market Inc	10	• **Shared EIS ≠ Shared Responsibility:** While the Navy and NASA share some infrastructure, their missions and impacts are distinct. A joint EIS blurs accountability and complicates community oversight. Each agency should have separate environmental reviews, stewardship plans, and community obligations.	The Draft EIS was prepared as a joint document per Department of Land and Natural Resources' request to provide a comprehensive review of activities at PMRF and KPGO. This approach was recommended by State and federal regulators to streamline environmental analysis, avoid duplication, and ensure that cumulative impacts are considered in a single, coordinated review.	EIS Process
0081	Joell Edwards	Wainiha Country Market Inc	11	**In Conclusion:** The people of Kaua'i are not asking for favors—we are asking for **kuleana**. True stewardship requires more than vague promises. It demands: • Cleanup of contaminated and UXO-impacted areas • Restoration of wetlands and native habitats • Transparent biosecurity protocols • Investment in housing, public health, and environmental justice • Cultural accountability for lands like Ka'ula and shorelines impacted by military use Please revise the Final EIS to reflect these needs. Lease renewals must not proceed without binding commitments to protect the land, the ocean, and the people who call this place home. Mahalo for your consideration, Joëll M. Edwards joelledwards@email.com 808-482-7852	The Navy and NASA thank you for your detailed comments and appreciate your participation in the EIS process.	Cultural Practices
0082	Leah Miller		1	Please accept this as my personal testimony and comments regarding the US Navy Draft Environmental Impact Statement (Draft EIS) on proposed retention of 8,195 acres of stolen Hawaiian Kingdom lands in Mānā, Nohili, Koke'e, and surround areas ma uka to ma kai. Endangered Species Are at Risk. Endangered, native, and endemic species (our non Human relatives) like the honu, monk seals, native birds, native flies, and plants live on Navy-controlled lands and nearby waters. Their habitats are harmed by rocket launches that ignite vegetation, amphibious assaults that disturb the shoreline, and warships and sonar that disrupt fragile ocean ecosystems. Stolen Hawaiian Lands. The Navy falsely claims these are "ceded" lands, ignoring that Kanaka Maoli never consented to the U.S. takeover of Hawaiian Kingdom Crown and Government Lands. These are unceded, illegally occupied Hawaiian lands — and the DEIS erases that truth to justify continued military control. Mahalo for your time.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes (HRS) Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS. Rocket launches, amphibious assaults, and the operation of sonar by warships are not included in the Proposed Action analyzed by this EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are	Land Use and Access

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					analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	
0083	Steven Pereira		1	I support the mission and benefits that PMRF and KGPO operations currently provide for Kauai, the State of Hawaii, and our nation, and I fully endorse alternative #1, long term continued leasing and easements with DLNR and the State of Hawaii. I was born and raised on Kauai and lived here my entire life except for a 3-yr enlistment in the Army and time away at college. When I returned from college in 1994 with my degree in Electrical Engineering, I could not find a job. Kauai Electric (at the time), Hawaiian Telephone, County of Kauai, State of Hawaii, and all the private businesses I sought employment with weren't hiring. After 5 months of looking and waiting, my phone rang. It was the Navy calling, asking if I was interested in an engineering position in the PMRF Public Works Office. Immensely relieved, I took that job offer and have been at PMRF ever since. I am forever grateful for PMRF given me the chance to remain at home on Kauai and earn a living for family and myself. I am retirement eligible now and passed up on the Deferred Resignation Program offer that was extended to federal employees in March. Taking the offer meant that the engineering billet I currently occupy would be abolished, in all likelihood, and Kauai would have one less opportunity for a young engineering graduate returning home, in finding employment on Kauai, like I did some 30 years ago. I will work until the end of the year, then retire, somewhat reluctantly, because the work at PMRF has been fulfilling. I am hopeful federal hiring restrictions will ease up before I retire and PMRF may be able to hire that young engineer returning home, whom I would enjoy mentoring to take my place when I finally move on to a life of leisure and fishing; along a shoreline at PMRF I might add, where that opportunity exists because of the great relations and openness the base strives to have with the community.	The Navy and NASA thank you for your comment and your support of PMRF. The Navy and NASA acknowledge your support of Alternative 1. PMRF thanks you for your dedication to your career and community in your position as an engineer in the Public Works Office, and wishes you the best in your retirement.	General Support
0083	Steven Pereira		2	There are so many other great things that PMRF and KPGO do to benefit the community; I hope that people take the opportunity to read about those in this EIS. I'd like to conclude by mentioning what was one of the major highlights in my career: the opportunity to be a part of the Navy's Enhanced Use Lease team and a partner to KIUC's construction of a new distribution substation at Barking Sands, and their AES power partner's construction of the large PV and battery energy storage site on base. People may have read about it in KIUC's Currents magazine and be familiar with these additions to the island grid, or perhaps many may have caught eye of them while driving along Kaumualii Hwy near mile marker 30, but many may not be familiar with the benefit that was realized from it during the 2024 Kamuakani wildfires. While fields were burning and KIUC was planning the shutdown of power transmission lines feeding the westside as a preemptive protective measure, collaborative discussions were struck between KIUC, AES, and PMRF about use of the PV and batteries on the base for keeping critical facilities on the west side powered-up in the event of the transmission lines shutdown. With the fires closing in on those powerlines, KIUC implemented their shutdown, configured circuits, and the PV and batteries at PMRF began serving the critical west side facilities, including KVMH and the emergency center setup in Waimea for the populace evacuating the wildfire areas.	Thank you for recognizing services provided to the community by PMRF. The PMRF Solar Photovoltaic Park encompasses 140 acres and generates 70 megawatt-hour electricity and supplies enough clean energy to power 6,000 households. The EA prepared for the Joint Forces Solar Power Generation Project at PMRF is referenced in the Final EIS. Also, please refer to Section 4.1.5 (Introduction to Analysis/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS to read about ongoing renewable and clean energy projects and projects slated for future development at and within the vicinity of PMRF.	Utilities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0084	Fern Holland		1	Submitting testimony as an individual member of the Kauai County Council.	Comment noted.	EIS Process
0084	Fern Holland		2	Naval Facilities Engineering Systems Command, Environmental OPHEV2 Attention: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling 400 Marshall Road, Building X-11 Pearl Harbor, HI 96860 Via Email Only: info@PMRF-KPGO-EIS.com Dear Ms. Ling, **RE: TESTIMONY ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR PROPOSED, CONTINUED USE OF STATE LANDS ON KAUAʻI FOR THE NAVY'S PACIFIC MISSILE RANGE FACILITY AND NASA'S KŌKEʻE PARK GEOPHYSICAL OBSERVATORY** In my capacity as an individual member of the Kauaʻi County Council, please accept the attached testimony on the draft EIS for the proposed continued use of State lands on Kauaʻi for the U.S. Navy's Pacific Missile Range Facility and the Kōkeʻe Park Geophysical Observatory. Please do not hesitate to contact me or the Office of the County Clerk, Council Services Division at (808) 241-4188 should you have any questions. Sincerely, FERN HOLLAND Councilmember, Kauaʻi County Council	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	EIS Process
0084	Fern Holland		3	Testimony from Kauaʻi County Councilmember Fern Holland on the PMRF/NASA Draft EIS *Executive Summary* • The DEIS must be comprehensive, including leased lands, surrounding areas, fee-simple parcels, and offshore impacts.	The Navy proposes to retain the use of 8,172 acres of State lands (684 acres of leaseholds; 7,488 acres of easement lands) and NASA proposes to retain the use of 23 acres of State lands (16 acres of leaseholds; 7 acres of easement lands) on Kauaʻi, Hawaiʻi. The Proposed Action of the Final EIS includes existing operations that occur on leasehold and easement lands, as described in Chapter 2. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis).	EIS Process
0084	Fern Holland		4	• Navy and NASA impacts should be separately evaluated for clear accountability.	The Draft EIS was prepared as a joint document per Department of Land and Natural Resources (DLNR) request to provide a comprehensive review of activities at PMRF and KPGO. This approach was recommended by state and federal regulators to streamline environmental analysis, avoid duplication, and ensure that cumulative impacts are considered in a single, coordinated review.	EIS Process
0084	Fern Holland		5	• Urgent transparency and action are needed on fuel storage, PFAS contamination, and chemical management.	Please see response to comment #19 which addresses your concern regarding fuel storage. Please see response to comment # 20 which addresses your concern regarding per- and polyfluoroalkyl substances (PFAS) at the former firefighting site at PMRF. Chemicals are stored according to the PMRF Spill Prevention, Control, and Countermeasures Plan as shown in Table 3.12-1 of the Final EIS. A chemical inventory is kept at PMRF, and all activities involving chemical use and storage are performed in accordance with federal requirements.	Hazardous Materials and Waste
0084	Fern Holland		6	• The Navy must collaborate on cleanup of runoff and contamination from adjacent pesticide use and landfills.	Other lands outside of the jurisdiction of PMRF, include but are not limited to, the Department of Hawaiian Home Lands (DHHL) land, State of Hawaiʻi Agribusiness Development Corporation (ADC) land, and County of Kauaʻi land. Pesticide use, and the conditions of soils within those areas, are outside the scope of this EIS. The Kekaha landfill is owned, managed, and operated by the County of Kauaʻi, and so all future cleanup of the landfill would be managed by the County of Kauaʻi.	Hazardous Materials and Waste

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					In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-5 includes the establishment of a Navy-DLNR-DHHL-Kekaha Agricultural Association-ADC-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i.	
0084	Fern Holland		7	• Unexploded ordnance risks require mapping, cleanup, and community safety planning before lease renewal.	There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land. Recently, during an infrastructure upgrade project conducted on Barking Sands, it was determined that a full Explosive Safety Submittal was required in that project area, (over 7 miles of area), and several pieces of munitions and explosives of concern were located and disposed. Any area where there is potential for UXO is closed to unauthorized personnel at all times to ensure public health and safety.	Ongoing Activities
0084	Fern Holland		8	• Wetland restoration and habitat protection must be actively pursued with local partnerships.	Restoration projects in the Project Area include restoration of the Mānā Plain to wetlands (Table 4.1-1 of the Final EIS) and native outplanting restoration efforts (Section 3.4.1 of the Final EIS, Biological Resources/Affected Environment). These activities are also described in Section 4.1.2 of the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) in Appendix K of the Final EIS. Local partnerships range from hunting programs at Mākaha Ridge to collaboration with the Kaua'i Conservation Alliance. Additionally, wetland restoration and habitat protection are a Sikes Act requirement, as stated in the 2023 PMRF INRMP (Appendix K of the Final EIS). As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities.	Biological Resources
0084	Fern Holland		9	• Live-fire activities on culturally sensitive Ka'ula Island must cease with plans for restoration and cultural stewardship.	The Navy and NASA respect your concerns related to Ka'ula Island. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	Ongoing Activities
0084	Fern Holland		10	• RIMPAC exercises cause predictable harm to marine ecosystems and must be suspended pending a full review.	The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0084	Fern Holland		11	• A dedicated biosecurity program is critical to manage invasive species like the Coconut Rhinoceros Beetle.	As discussed in Section 3.4.1 (Biological Resources/Affected Environment) of the Final EIS, coconut rhinoceros beetle (CRB) management on PMRF consists of extensive control measures, such as weekly pheromone trap checking, monthly advanced tree monitoring and inspections, covering of green waste with netting, and treatment of every potentially affected tree with a foliar spray. The Navy and NASA will continue to collaborate on management actions with Kaua'i Invasive Species Committee (KISC), the CRB Hawai'i Response Team, Division of Forestry and Wildlife (DOFAW), Department of Agriculture and Biosecurity (DAB), and NAVFAC. More information can be found in Section 4.1.3 of the 2023 PMRF INRMP (Appendix K of the Final EIS). The Navy has plans to develop a PMRF Biosecurity Plan that includes specific prescriptions to evaluate individual invasive species, to identify targeted species, to control further spread of those targeted species, and to develop and implement a program to monitor invasive species abundance. The plan will be coordinated with the Regional Biosecurity Plan for Micronesia and Hawai'i (Section 4.1.3 of the 2023 PMRF INRMP in Appendix K of the Final EIS).	Biological Resources
0084	Fern Holland		12	• The DEIS must acknowledge and mitigate the military's role in Kaua'i's housing crisis and social displacement.	The Navy and NASA respect your concerns regarding housing affordability on Kaua'i. As described in Section 2.1 (Proposed Action) of the Final EIS, the Proposed Action does not include the construction of any new housing. The distribution of military and civilian personnel and their dependents would continue to be more heavily concentrated in West Kaua'i due to the proximity to PMRF. Section 4.1.5 (Cumulative Effects/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS includes description of the Waimea 400 Master Plan which is planning stages and includes plans for affordable housing.	Socioeconomics
0084	Fern Holland		13	• Lease renewals should be conditioned on environmental cleanup and community-beneficial land restoration projects.	Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3 (Proposed Action and Alternatives/Alternative 3: No Action Alternative) of the Final EIS, discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. The Navy plans to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community, as discussed in Section 5.2 (Proposed Enhanced Engagements) of the Final EIS. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	Socioeconomics
0084	Fern Holland		14	• The Department of Defense should support community healing programs, such as drug rehabilitation and transitional housing.	The Navy and NASA respect your commitment to community healing programs; however, it is outside the scope of this EIS to discuss this type of community support. However, Enhanced Engagement-4 for Socioeconomics (Section 5.2 of the Final EIS) describes the Navy's commitment to communication and strengthening community relationships.	Socioeconomics
0084	Fern Holland		15	• True stewardship requires ending harmful chemical use, restoring wetlands, providing funds for landfill remediation, and addressing social inequities.	The Navy strives to balance military readiness with long-term resource protection. Per federal regulation, the Navy adheres to the Spill Prevention, Control, and Countermeasure Plan which regulates the use of chemicals on leasehold and easement lands, and implements several Standard Operating Procedures and Best Management Practices in the management of any hazardous material at leasehold and easement lands (Table 3.12-1).	Hazardous Materials and Waste

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					In regard to wetland restoration, the approach to analysis in this EIS, as with all National Environmental Policy Act (NEPA)/HEPA (Hawai'i Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. However, as noted in Table 4.2-1 of the Final EIS, PMRF and Kekaha Agricultural Association (KAA) are partnering in an initiative supported by the Department of Defense's Readiness and Environmental Program to create an open floodable space on easement lands, which will promote the regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds. This area is shown in Figure 3.7-6 in the Final EIS. The Kekaha landfill is owned, managed and operated by the County of Kaua'i, and management actions including funding landfill remediation, are outside of the jurisdiction of PMRF. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-5 includes the establishment of a Navy-DLNR-DHHL-KAA-ADC-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i.	
0084	Fern Holland		16	A. Introduction Aloha and mahalo nui loa to the Kaua'i Board of Land and Natural Resources, the U.S. Navy, NASA, and all agencies involved in the Pacific Missile Range Facility and Kaua'i Test Facility operations. I recognize and appreciate the important roles the base plays in our community's safety, economy, and technological advancement. I also honor the commitment of the Navy, NASA, and their staff to Hawaiian stewardship, and the respectful efforts made by lineal descendants and cultural practitioners to protect our sacred 'āina, minimize environmental impacts, and give back to the community. It is in this spirit of mutual respect and kuleana that I submit my testimony for your consideration.	Thank you for your comment and your support of PMRF's role in community safety, the economy, and technological advancement. PMRF is also committed to protecting cultural resources, as discussed in detail in Section 3.3.1.5 (Culture Practices/Existing Conditions) of the Final EIS. The Navy and NASA appreciate your participation in this EIS process.	General Support
0084	Fern Holland		17	The Need for a Truly Comprehensive EIS The Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF) and NASA's Kaua'i Test Facility (KTF) must be genuinely comprehensive. It cannot limit its scope to only the leased lands or narrowly defined operational footprints. Instead, it must assess the full environmental and cultural impacts, including fee-simple parcels, surrounding lands, and offshore areas influenced by PMRF activities. Therefore, my comments as part of this testimony address the environmental concerns and suggestions I have much more broadly than the existing context of the current draft in the hope that these more widespread impacts will be considered moving forward. Only through this holistic approach can the DEIS uphold environmental justice, respect Native Hawaiian kuleana, and ensure meaningful protection for Kaua'i's unique ecosystems and communities. This includes addressing legacy contamination (even that of which is not directly caused by Navy and NASA activities), cultural stewardship, and the cumulative social effects of a long-standing military presence on Kaua'i. The DEIS focuses narrowly on leased lands and immediate project boundaries, ignoring the broader interconnected environmental and cultural systems of West Kaua'i. A truly comprehensive EIS must:	As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes (HRS) Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has also been prepared in accordance with the following: NEPA (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS. Additionally, the Navy and NASA are "applicants" in the HRS Chapter 343 EIS process and, as such, have proposed the Project as described in Section 2.0 of the Final EIS. The scope of the Project as defined by the applicants is defined by the area for which the applicants seek real estate agreements with the State of Hawai'i Department of Land and Natural Resources (DLNR). The Project in the Final EIS is defined in Chapter 2 (Proposed Action and Alternatives) consistent with HAR section 11-200.1-2, which defines Project as the "discrete, planned undertaking that is site and time specific, has a specific goal or purpose, and has potential impact to the environment."	EIS Process

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				• Include fee-simple parcels, adjacent lands, and offshore activities, especially where impacts flow across jurisdictional lines (such as the Mānā Plain drainage system). • Evaluate cumulative and indirect impacts, not just isolated site-specific ones. • Assess climate resilience, sea-level rise vulnerabilities, and long-term stewardship of sensitive coastal ecosystems. The health of our ʻāina and kai cannot be compartmentalized. Federal use of Hawaiian lands carries deep responsibility to ensure a holistic environmental review that reflects cumulative and generational impacts.	As described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the Navy's use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training. As stated in Section 1.1 of the EIS, "Approximately 95 percent of the easement lands are passively used for encroachment buffers and mission readiness, the remaining 5 percent of easement lands are used for access and utility easements. No ground-based training occurs on these leasehold and easement lands." As described in Table 2-4 of the Final EIS, some, but not all, training and testing activities conducted on federally owned land and in-water are supported by the Navy's infrastructure on State lands. Navy training and testing operations do not occur on State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5, Scope of Environmental Analysis. Consistent with HAR section 11-200.1-24, the Final EIS includes an analysis of indirect and cumulative effects. Indirect effects are analyzed in each resource section in Chapter 3, and cumulative effects are analyzed in Chapter 4. Section 4.1 (Introduction to Analysis) of the Final EIS includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified. In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/ Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	
0084	Fern Holland		18	Problems with Combining Navy and NASA in One EIS While the DEIS merges Navy and NASA operations into a single document for "efficiency," I think it is important to note that while there are shared resources this does not necessarily mean shared kuleana or accountability. If the full context of the impacts associated • The Navy's live-fire and sonar testing have direct impacts on marine life and cultural sites, whereas NASA's satellite tracking and communications raise distinct concerns like electromagnetic emissions. • A joint EIS risks blurring responsibility, making it harder to hold either agency accountable for contamination or damage. • Community members deserve clarity: each agency must have its own environmental review, accountability channels, and community engagement. Recommendation: The Final EIS should clearly separate Navy and NASA impacts, require distinct accountability and cleanup pathways, and consider a standalone EIS for NASA if operations expand.	See response to comment #4 above.	EIS Process
0084	Fern Holland		19	B. Environmental Impacts and Considerations 1. Fuel Storage, Chemical Management, and PFAS Concerns The Draft Environmental Impact Statement (DEIS) references the presence of fuel storage infrastructure, including aboveground and underground tanks used for Jet	The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. This includes HRS section 342L, *Underground Storage Tanks.*	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Propellant-8 (JP-8), diesel, and gasoline. (**Hazardous Materials and Waste Section 3.12**) However, the DEIS fails to disclose critical details—such as tank capacities, total fuel volumes, specific locations, maintenance history, or compliance with federal and state environmental regulations—citing vague "security concerns." While operational security is important, environmental safety and public health require transparency and accountability. The people of Kaua'i have a right to know the scale of risk posed by these facilities, especially given the island's fragile aquifers, proximity to sensitive ecosystems, and reliance on limited freshwater resources. The absence of this data creates unacceptable blind spots in the assessment of spill risk, cumulative contamination potential, and emergency response readiness. Red Hill on O'ahu is a stark example of what happens when secrecy and neglect overshadow accountability: fuel leaks poisoned water supplies, displaced families, and caused a public health disaster that will take decades to fully address. Kaua'i cannot afford a repeat of that tragedy.	The Final EIS discloses general fuel tank locations for all fuel stored on leasehold and easement lands (exact location cannot be provided for security reasons) and all fuel tanks are presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. As discussed in more detail in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS, per State of Hawai'i Department of Health regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all underground storage tanks. All aboveground storage tanks are equipped with a secondary containment device (i.e., steel basin, double-walled steel tank) and all underground tanks are equipped with advanced leak detection systems. Risk assessments are conducted for all storage tanks at PMRF by a third-party environmental engineering firm every two years. Please see the Final EIS for more information. Please see response to comment #25 which addresses your concerns regarding emergency response readiness. Water quality monitoring programs are conducted at PMRF to test for the presence of contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Mānā Water Well) of the Water Resource section of the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0084	Fern Holland		20	PFAS Contamination Risk • The DEIS also acknowledges historic use of Aqueous Film-Forming Foam (AFFF) for firefighting at PMRF(**Hazardous Materials and Waste Section 3.12 4-5**), which contains per- and polyfluoroalkyl substances (PFAS)—often called "forever chemicals" due to their persistence in soil and groundwater. These substances are linked to cancer, reproductive harm, and immune system dysfunction, and they do not break down in the environment. • While the DEIS states that PMRF is part of a broader Navy PFAS investigation program, no site-specific data, sampling results, or cleanup plans have been provided to the public. This is unacceptable, given: • The known risks of PFAS to human and ecological health. • The precedent of other military installations in Hawai'i where PFAS contamination has been confirmed. • The Navy's kuleana to prevent further harm to the 'āina and to the communities that depend on clean water.	Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service (USFWS) through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency (EPA) screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF.	Hazardous Materials and Waste
0084	Fern Holland		21	Why This Matters for Kaua'i • Hydrological vulnerability: West Kaua'i's shallow aquifers are highly susceptible to contamination, and there is limited redundancy for water supply. • Proximity to shoreline ecosystems: A spill or PFAS plume could reach the ocean, harming coral reefs, fisheries, and cultural resources. • Cumulative impacts: Combined with pesticide runoff, landfill leachate, and industrial contaminants, the risk of compounding toxicity is severe.	Your concerns have been noted. As discussed in more detail in response to comment #20, the Navy continues to engage with DOH and USFWS and will comply with all relevant State and federal regulations during the remedial investigation process.	Hazardous Materials and Waste

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0084	Fern Holland		22	Recommendations: • **Conduct a full accounting of all fuel storage systems associated,** including: o Number of tanks o Estimated capacity o Location (generalized if necessary for security) o Compliance with EPA and Hawai'i Department of Health regulations o Results of the most recent inspections and any corrective actions taken	Please see response to comment #19 for information regarding fuel storage at PMRF. For results from previous inspections, the Navy and NASA encourage you to contact the landowner, DLNR, as the property falls under State jurisdiction .	Hazardous Materials and Waste
0084	Fern Holland		23	• **Extend this assessment to all fuel and chemical storage on fee simple parcels,** not just state-leased lands.	Please see response to comment #19, which addresses your concern regarding fuel stored on fee simple lands.	Hazardous Materials and Waste
0084	Fern Holland		24	• **Commit to third-party verification** of compliance and **public reporting of summarized findings** to ensure transparency and community trust.	Risk assessments are conducted for all storage tanks at PMRF by a third-party environmental engineering firm every 2 years which determine if updates to site-specific response plans are needed. These risk assessments inform the PMRF Spill Prevention, Control, and Countermeasure Plan (SPCC), which is federally mandated and updated every 5 years. More information on the contents of the Plan is shown in Table 3.12-1 of the Final EIS. The document in its entirety contains sensitive information and is not publicly available.	Hazardous Materials and Waste
0084	Fern Holland		25	• **Provide a detailed spill prevention and emergency response plan,** including: o Contingency planning for catastrophic failures o Coordination with state and county emergency agencies o Public notification protocols	The PMRF SPCC Plan includes a detailed spill prevention and emergency response plan. The Plan serves as a mechanism to ensure that all response personnel are adequately prepared to respond to a release of oil or hazardous substance that require an emergency response and contains the immediate procedures to be carried out by facility personnel once a discharge is detected or emergency incident is reported. This response, including coordination with State and County emergency agencies, is discussed in Public Health and Safety (Section 3.9.1.4.1, Main Base). The EIS website (www.pmrf-kpgo-eis.com) also contains a copy of the Occupational Health and Safety spill flowchart, detailing instructions in the event of an unintended spill. This plan in its entirety contains sensitive information and is not publicly available.	Hazardous Materials and Waste
0084	Fern Holland		26	• **Complete a comprehensive PFAS site investigation** across all known and suspected AFFF use areas **before any lease renewals are considered**. This must include: o Soil and groundwater sampling o Disclosure of results to the public o Development of an immediate cleanup plan if contamination is confirmed	Please see response to comment #20 regarding the ongoing PFAS investigation, upcoming remedial investigation, and AFFF.	Hazardous Materials and Waste
0084	Fern Holland		27	• **Transition all firefighting systems on Kaua'i to PFAS-free alternatives immediately,** and provide documentation of compliance.	As discussed further in comment #20 and in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF.	Hazardous Materials and Waste
0084	Fern Holland		28	• **Establish a permanent monitoring program for PFAS and other hazardous chemicals** at PMRF, with data made available to the public on an annual basis.	As discussed in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) of the Final EIS, the Department of Defense has exceeded current EPA guidance and proactively implemented policies to monitor drinking water for PFAS at all service owned and operated water systems at a minimum of every 2 years. Per the 2024 Mānā Well Consumer Confidence Water Quality Report, over 70 regulated contaminants that have the potential to be in drinking water were tested in 2023, and in all cases, the levels measured were well within requirements for safe drinking water, and all drinking water testing results were below the method reporting limit for all PFAS compounds. The Navy repeated drinking water testing in 2024 and 2025 (except PFAS testing, as compliance monitoring is not required until 2027 per the EPA) and like previous results, all levels measured were within both EPA and State requirements for safe drinking water. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Hazardous Materials and Waste
0084	Fern Holland		29	The Cost of Inaction Failing to address these risks is not just a regulatory gap—it is a direct threat to public health, cultural survival, and ecosystem integrity. Red Hill must serve as the	The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill are outside the jurisdiction and scope of this EIS. The Navy and NASA suggests contacting government officials to voice concerns regarding other military activities. In an effort separate from this EIS, the State of Hawai'i	Ongoing Activities

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				cautionary example, not the template for future disaster. The Navy and NASA must choose proactive transparency over reactive crisis management.	published a new website in September 2025 to provide the public more access to information about military land leases in Hawai'i (https://engage.hawaii.gov/).	
0084	Fern Holland		30	2. Adjacent Contamination from Pesticide Use, Landfill Leachate, and Runoff into Coastal Waters The Draft Environmental Impact Statement (DEIS) acknowledges the Mānā Plain Drainage Ditch System and notes that stormwater runoff from surrounding agricultural lands and infrastructure discharges into the ocean at outfalls such as Kawai'ele and Nohili. **(Water Resources 3.7-4 through 3.7-5**)However, the DEIS fails to fully account for the historic and ongoing contamination risks tied to these discharge points, which are in close proximity to PMRF operations and lease areas. Historic and Ongoing Contamination Risks • The Kekaha Landfill, located near the PMRF lease boundary, has been an enduring source of community concern. This landfill, which receives municipal waste, industrial materials, and potentially hazardous debris, generates leachate—a toxic liquid formed when rainwater percolates through waste. • Leachate can migrate through groundwater or drainage systems, ultimately discharging to nearshore waters. Local advocacy groups, the Surfrider Foundation, and the Hawai'i Department of Health have all raised alarms about the pollutant load at these outfalls, including heavy metals, hydrocarbons, plastics, and PFAS-like compounds. • Adjacent agricultural lands, historically plantation fields and now largely leased to industrial seed companies, have contributed pesticides, herbicides, and fertilizers to the drainage system. Many of these chemicals are restricted-use pesticides linked to reef degradation and bioaccumulation in marine life. The cumulative effect of military operations, chemical-intensive agriculture, and waste management practices has created a toxic burden on the ecosystems of West Kaua'i—one that disproportionately affects Native Hawaiian communities, subsistence gatherers, and endangered species.	As noted in Section 3.7.1.4.2.6 (Water Resources/Surface Water Quality) of the Final EIS, the Navy has cooperated with ADC to conduct surface water quality throughout the Mānā Plain and works closely with partners involved in the current water quality monitoring project. Agricultural lands on the easements at Main Base, and activities conducted on those lands, are under the jurisdiction of ADC. ADC has conducted various forms of water quality, including testing for pesticides, hydrocarbons and heavy metals at the pump stations and throughout the Plain for over two decades with a particular focus on the agricultural drainage ditches and upland input, including three outfalls located on Navy fee simple land. If you are interested in learning more about this program, or want to view the test results, all ADC Mānā Plain water quality monitoring data since September 2020 is publicly available on the ADC website (https://dbedt.hawaii.gov/adc/manaplain/). Kekaha landfill is owned, managed, and operated by the County of Kaua'i. As discussed in Hazardous Materials and Waste (Section 3.12), no hazardous waste generated at PMRF is disposed of at the Kekaha Landfill. All hazardous waste produced on leasehold and easement lands is handled, managed and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. A National Pollutant Discharge Elimination System (NPDES) permit has also been issued to cover discharge points from the Mānā Plain drainage system. Permittees are listed as ADC and County of Kaua'i. The permit requires ADC to initiate other comprehensive measures to ensure long-term environmental compliance with environmental laws and regulations. The final permit was issued on August 22, 2025, and became effective on October 1, 2025. More details on the final permit are discussed in Water Resources (Section 3.7.1.4.2.6, Surface Water Quality) of the Final EIS. The final permit is available on the State of Hawai'i Department of Health website at https://health.hawaii.gov/cwb/final-individual-permits/.	Water Resources
0084	Fern Holland		31	PMRF's Role and Kuleana The DEIS asserts that PMRF does not have jurisdiction over the ditch system. However, **legal jurisdiction does not erase moral and environmental responsibility**. PMRF benefits from and operates adjacent to these systems; its infrastructure, hydrology, and roadways influence stormwater patterns. Furthermore, military land occupation historically altered these landscapes, contributing to their current configuration. To say "we lack authority" is insufficient. Stewardship requires proactive engagement—not avoidance.	As discussed in Section 3.7.1.4.1.1 (Water Resources/Main Base) of the Final EIS, the DLNR, the County of Kaua'i, and ADC work collaboratively to manage and maintain the network of ditches, canals, drainages, and reservoirs that convey and store water across the Plain, and are supported by the KAA and the Navy. The Navy pays operation and maintenance costs for the Kawai'ele Pump Station, located on leasehold land, and has equipped the drainage outlets, located on fee simple land, with pollution control measures to increase water quality at the outfall sites. The Navy understands the challenges associated with water management in the Mānā Plain while considering all stakeholders. Therefore, the Navy is presenting Enhanced Engagement-5, as shown in Table 5-2 (PMRF and KPGO Proposed Enhanced Engagements), which establishes a Navy-DLNR-DHHL-KAA-ADC-Kaua'i County working group to collaboratively manage water resources in West Kaua'i and discuss long-term use and resiliency.	Water Resources
0084	Fern Holland		32	Impacts to Marine and Cultural Resources Contaminated stormwater harms: • Native marine species critical to ecological health; • Cultural practitioners and local fishers who rely on clean waters for 'ohana subsistence and ceremonial purposes;	The Navy and NASA respect your concerns regarding impacts from the Proposed Action to marine, terrestrial, and cultural resources, as well as cumulative impacts. Responses to your concerns are addressed below.	Biological Resources

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				• Endangered waterbirds and wetlands near the Mana Plain. The cumulative impacts represent an environmental injustice—compounded by the lack of accountability and the ongoing militarization of Hawaiian land.	Effects to general wildlife species and special status wildlife species, such as endangered waterbirds, from the Proposed Action are described in detail by location in Biological Resources (Section 3.4.2, Environmental Consequences) in the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0084	Fern Holland		33	Recommendations: • **Collaborate with the State (HDOH), County of Kaua'i, and Agribusiness Development Corporation (ADC)** to: o Implement comprehensive **water quality monitoring** of the Mānā Plain ditch system and all outfalls. o Test for pesticides, heavy metals, PFAS, hydrocarbons, and landfill leachate.	Please see response to comment #30 for information on Navy-ADC collaboration and water quality monitoring in the Mānā Plain, including information on where to find test results. Kekaha landfill is owned, managed and operated by the County of Kaua'i, and therefore, testing for landfill leachate would be under the jurisdiction of the County of Kaua'i.	Water Resources
0084	Fern Holland		34	• **Disclose any historic or current military contributions** to pollutants in the ditch system.	Section 3.7.1.4.2.6 (Water Resources/Surface Water Quality) of the Final EIS includes a discussion on pollutants found within the ditch system. Based on the Mānā Plain water quality results, contributions to pollution (e.g., total suspended solids and *Enterococcus* bacteria) are lower at the outfalls located on Navy fee simple land compared to the ocean drainage outfall sights that drain from upland and/or at sites located outside of the PMRF boundary.	Hazardous Materials and Waste
0084	Fern Holland		35	• **Develop and fund a joint remediation plan** to prevent contaminants from reaching the ocean.	Please see response to comment #30 and #31 for information on how the Navy collaborates with stakeholders for water resource management in West Kaua'i.	Hazardous Materials and Waste
0084	Fern Holland		36	• Establish a **community-led oversight committee** for transparency in testing and mitigation.	As shown in Table 5.2-1, Enhanced Engagement-5 described in the Final EIS includes the establishment of a Navy-DLNR-DHHL-KAA-ADC-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i.	Hazardous Materials and Waste
0084	Fern Holland		37	• **Condition any lease renewal** on a **binding financial commitment** from the federal government to assist with **Kekaha Landfill closure, long-term remediation, and leachate management.**	Kekaha landfill is owned, managed, and operated by the County of Kaua'i, and therefore, leachate management would be under the jurisdiction of the County of Kaua'i. As discussed in Section 3.12 (Hazardous Materials and Waste) in the Final EIS, no hazardous waste generated at PMRF is disposed of at the Kekaha Landfill.	Hazardous Materials and Waste
0084	Fern Holland		38	• Support for **wetland restoration and regenerative agriculture** as part of a larger environmental justice framework.	Please see response to comments #8 and #15 for a response regarding wetland restoration.	Socioeconomics
0084	Fern Holland		39	• **Require phase-out of chemical-intensive agriculture** on state-leased lands within the military footprint, and partner with the State and local communities to **transition these lands to native ecosystem restoration and food sovereignty projects**.	Restrictive use of these lands by the Navy under the current lease agreement does not determine the use of these lands, however it does help preserve them for agricultural use. Agricultural lands on the easement lands at Main Base, and activities conducted on those lands, are under the jurisdiction of ADC and DLNR. All agricultural leaseholders are required to provide to ADC a Natural Resources Conservation Service-approved Conservation Plan which discloses site-specific agricultural practices and also requires disclosure of other pertinent information including pesticide use, best management practice records, periodic inspection reports, and maintenance records. Many tenants on ADC are small farms that distribute produce and other crops grown on the land locally. ADC has also worked to help the Department of Education acquire a property on ADC land to build facilities for food production which are intended to encourage new food businesses and provide a pipeline for local agricultural produce to reach markets.	Water Resources

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					Please see response to comments #8 and #15 for response regarding native ecosystem restoration.	
0084	Fern Holland		40	Why Financial Commitment and Restoration Are Non-Negotiable The Navy and federal government have the capacity—and obligation—to correct decades of environmental harm and ensure future resilience. This means: • Funding the closure and cleanup of the Kekaha Landfill, which currently poses one of the greatest contamination threats to West Kaua'i's reef ecosystems. • Providing capital investment for stormwater treatment and wetland expansion to filter contaminants naturally. • Supporting community-based land uses such as cultural restoration, traditional agriculture, and habitat rehabilitation. Stewardship is not a symbolic gesture—it is active, restorative, and rooted in accountability. This is the time for the federal government to demonstrate true kuleana: invest in cleaning up the contamination, restoring the wetlands, and ensuring that lands once impacted by militarization serve the health and well-being of Kaua'i for generations to come.	Kekaha landfill is owned, managed, and operated by the County of Kaua'i and therefore, closure and cleanup of the Kekaha Landfill is outside of the jurisdiction of the PMRF. As discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS, the Navy is committed to the PMRF recycling programs, waste minimization programs, and green waste composting/use. No hazardous waste generated at PMRF is disposed of at the Kekaha Landfill. Please see response to comment #38 regarding wetland use and expansion and preservation of agricultural land. As discussed in Section 3.7.2.4.1 (Water Resources/Main Base) of the Final EIS, under the No Action Alternative, the Navy would no longer pay operation and maintenance costs for the Kawai'ele Pump Station (KPS), which could result in increased surface water levels and flooding of the Mānā Plain, which would decrease the amount of viable agricultural land. By paying for the operation and maintenance costs of KPS, the Navy supports ADC in providing opportunities to farmers to use the land for agriculture, including for traditional agricultural practices. Finally, as discussed in Table 5-2.1 of the Final EIS, PMRF has proposed Enhanced Engagements to highlight areas of current collaboration and opportunities for future community engagement.	Socioeconomics
0084	Fern Holland		41	3. Unexploded Ordnance (UXO) Risks and Safety The Draft Environmental Impact Statement (DEIS) acknowledges that unexploded ordnance (UXO) and other munitions and explosives of concern (MEC) may be present on PMRF lands due to past live-fire exercises, ordnance testing, and training. (**Geological Resources Section 3.5.12-13**) In this section is states "prior to any ground-disturbing activities within areas known or suspected to contain munitions and explosives of concern, UXO avoidance or clearance operations would be conducted by qualified personnel in accordance with DoD policy and procedures." While this language addresses future construction activities, it fails to address the existing, ongoing risk of legacy UXO to public safety, cultural practitioners, and natural resources. The DEIS provides no clear plan for proactive cleanup, no timeline for remediation, no publicly accessible risk mapping, and no transparent community safety protocols. Why This Is a Serious Concern • Public Safety Risks: UXO remains live and dangerous for decades. Unauthorized entry or accidental disturbance could result in severe injury or death to community members, including subsistence fishers or cultural practitioners. • Environmental Impacts: UXO can leach heavy metals and explosive residues into soil and groundwater, creating long-term contamination hazards for ecosystems and endangered species. • Cultural Access: PMRF occupies lands that hold cultural significance to Native Hawaiian lineal descendants and practitioners. Restricted access zones and contamination risk further compound cultural displacement. • The current approach—essentially "leave in place and restrict access"—is not an acceptable long-term solution. It prioritizes convenience over safety, environmental stewardship, and community trust. • Recent disasters like Red Hill demonstrate that lack of proactive risk mitigation leads to public health crises, massive financial liability, and irreparable harm to	This EIS does not have a Geological Resources section. There is no UXO on leasehold or easement lands in the Project Area; please see response to comment #7 regarding UXO. The Navy strives to provide long-term resource protection, and works with neighboring communities to respond to requests for cleanup. For example, in 2024, the Navy partnered with a local business and volunteers to clear debris from an old missile crash that occurred almost 60 years ago on DHHL land in Niu Valley, Kaua'i. PMRF responders cleared approximately 2,300 pounds of debris from the site, and all recyclable debris was disposed of properly at a recycling center in Līhu'e. This effort will allow for more effective land use for DHHL purposes. PMRF works diligently with the community to provide access for Cultural Practices. The Navy and NASA are presenting Enhanced Engagements in the Final EIS, and these are discussed in Chapter 5 and listed in Table 5.2-1. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. PMRF Kaua'i (https://pmrfkauai.com/) will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions.	Hazardous Materials and Waste

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				community trust. Waiting for an incident to occur is neither defensible nor compliant with the spirit of federal environmental and cultural protection laws.		
0084	Fern Holland		42	Recommendations: • **Conduct and publish a comprehensive UXO risk assessment** of all PMRF leasehold lands, adjacent beaches, and nearshore waters, including: o Detailed mapping of confirmed and suspected UXO areas o Risk categorization based on type, depth, and proximity to public areas	Please see response to comment #7 regarding UXO management at PMRF.	Hazardous Materials and Waste
0084	Fern Holland		43	• **Commit to cleanup and remediation of legacy UXO before any lease renewals are approved**, prioritizing: o High-risk zones near cultural sites, public access corridors, and sensitive habitats o Areas needed for future community use or restoration	Please see response to comment #7 regarding UXO management at PMRF.	Hazardous Materials and Waste
0084	Fern Holland		44	• **Develop a transparent, community-informed safety plan**, which includes: o Public education and notification about UXO hazards o Clearly marked boundaries and access guidelines o An incident response protocol that is coordinated with state and county agencies	Please see response to comment #7 regarding UXO management at PMRF.	Hazardous Materials and Waste
0084	Fern Holland		45	• **Include UXO remediation in the Environmental Mitigation and Community Benefit Plan**, ensuring federal funding is allocated for: o Removal and safe disposal of munitions o Soil and groundwater testing at former impact zones o Restoration of cleared lands for cultural and ecological uses	Please see response to comment #7 regarding UXO management at PMRF.	Hazardous Materials and Waste
0084	Fern Holland		46	• **Establish a permanent reporting system**, with annual public updates on: o UXO removal progress o Risk reassessment findings o Community consultations and safety measures Leaving UXO buried indefinitely is a continuation of harm and environmental injustice. True stewardship requires more than compliance—it demands accountability, transparency, and active remediation. The people of Kaua'i deserve clear commitments and visible progress to make these lands safe for current and future generations.	Please see response to comment #7 regarding UXO management at PMRF.	Hazardous Materials and Waste
0084	Fern Holland		47	4. Military Use of Ka'ula Island Ka'ula Island, located off the west coast of Ni'ihau, is not an empty rock or a mere training ground—it is a place of deep cultural and spiritual significance, embedded in Native Hawaiian mo'olelo (oral traditions) and ancestral connections to the kai (ocean) and 'āina (land). The island is also an important seabird nesting habitat, supporting species such as 'ua'u kani (wedge-tailed shearwater) and noio (black noddy), which are integral to Hawai'i's fragile marine ecosystem. Yet, despite its cultural and ecological importance, Ka'ula remains an active live bombing range for the U.S. military: • Live ordnance continues to be deployed on and around the island as part of training exercises. • Unexploded ordnance (UXO) remains on-site, posing ongoing hazards to both human life and the environment. • Access to Ka'ula is restricted—not to protect the land, but to protect people from the danger created by the military itself. • This is not stewardship. This is desecration.	The Navy and NASA respect your concerns related to Ka'ula Island. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the 2025 PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS and a link to the full document are included in Table 1-5 of the Final EIS. As described in Biological Resources (Section 3.4) of the Final EIS, PMRF maintains an up-to-date INRMP. The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation.	
0084	Fern Holland		48	Impacts of Continued Bombing • Physical Destruction of Habitat o Live-fire exercises damage fragile cliffside nesting areas for seabirds and degrade the rocky terrain, which has cultural significance as a wahi pana (storied place). • Persistent UXO Hazards o Unexploded bombs remain scattered across Ka‘ula and its surrounding waters, creating long-term contamination risks from metals and explosive residues. • Marine Impacts o Bombing introduces heavy metals and explosive compounds into nearshore waters, which can leach into coral reef systems and harm marine life. • Cultural and Spiritual Harm o Ka‘ula is part of a continuum of sacred spaces across the Hawaiian archipelago. Continued militarization perpetuates a cycle of cultural erasure and environmental violence. Why This Matters • The ongoing use of Ka‘ula for live-fire training decades after similar sites elsewhere have been decommissioned reflects a double standard and a lack of commitment to cultural and ecological restoration in Hawai‘i. Other bombing ranges on the continent have been closed and remediated, yet Ka‘ula remains a sacrifice zone, its future held hostage to military convenience. • This is a clear violation of: • Environmental justice principles, as Native Hawaiian communities bear the burden of risk and loss. • Cultural resource protection laws, which require meaningful consultation and mitigation. • Public trust responsibilities, which demand the preservation of Hawai‘i’s unique natural and cultural heritage.	Please see response to comment #47 regarding impacts to Ka‘ula Island.	Hazardous Materials and Waste
0084	Fern Holland		49	Recommendations: • **Immediately cease all live-fire training and ordnance deployment on Ka‘ula Island and surrounding waters.** • **Develop and implement a comprehensive environmental restoration plan**, including: o Full UXO clearance and safe disposal o Soil and water testing for contaminants o Habitat rehabilitation for native seabirds and plant species • **Engage Native Hawaiian cultural practitioners, lineal descendants, and community leaders** to: o Guide cultural stewardship practices o Integrate traditional ecological knowledge into restoration efforts o Conduct cultural impact assessments prior to any future use or decision-making • **Explore co-management or full return of Ka‘ula Island** to a **Native Hawaiian cultural and conservation trust**, ensuring: o Legal protections for cultural access o Long-term ecological monitoring o A governance framework grounded in aloha ‘āina (love for the land) and stewardship ethics • **Provide public accountability** by: o Publishing a timeline for cessation of bombing o Allocating federal funding for remediation and restoration o Committing to long-term reporting on ecological and cultural recovery	Please see response to comment #47 regarding impacts to Ka‘ula Island.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				The militarization of Ka‘ula Island is an ongoing wound in Hawai‘i’s cultural and environmental landscape. Continuing to bomb a sacred island in 2025 is indefensible. True stewardship requires more than words—it requires action to heal what has been harmed, restore cultural access, and return Ka‘ula to its rightful role as a place of life, not destruction.		
0084	Fern Holland		50	5. Environmental Impacts of RIMPAC Exercises The Rim of the Pacific Exercise (RIMPAC), the world’s largest multinational naval exercise, is hosted biennially in Hawaiian waters, with PMRF providing key logistical support. Although the Draft Environmental Impact Statement (DEIS) acknowledges these activities, its analysis is limited to predictive modeling without in-depth examination of real-world impacts from repeated sonar use, vessel traffic, explosives, and ordnance disturbance. Evidence of Marine Harm and Stranding Events Naval sonar use has been consistently linked to marine mammal strandings worldwide. Relevant documented events include: • A 1998 RIMPAC-related stranding near Kaua‘i, involving one beaked whale and one sperm whale. • In 2004, approximately 200 melon-headed whales were observed entering Hanalei Bay, believed to be fleeing naval sonar activity conducted during RIMPAC. One calf later died. • A juvenile Cuvier’s beaked whale was found washed ashore on Moloka‘i after RIMPAC (causation being investigated). • Globally, mass strandings of beaked whales have repeatedly coincided with naval sonar use—including in the Canary Islands, Bahamas, and Greece. Studies estimate that high-intensity sonar and explosive use may result in hundreds of instances of hearing loss or marine mammal injury per year, including over 200 possible fatalities annually from training exercises across the Pacific.	The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0084	Fern Holland		51	Key Impacts Detailed in the DEIS • Disruptions to marine mammal behavior, including stress responses, disorientation, and potential injury or death. • Acoustic pollution, interfering with communication and navigation among whales and fish species. • Elevated ship strike risk during high-traffic exercise periods, particularly affecting humpback whales (koholā). • Underwater detonations and debris, contributing toxins and metal contaminants to nearshore ecosystems. • Air and water emissions from large-scale naval and aircraft operations. • While the DEIS labels these impacts as temporary, the biennial repetition of RIMPAC renders them cumulative and chronic.	Please see response to comment #50 which addresses RIMPAC exercises and associated impacts from offshore activities.	Ongoing Activities
0084	Fern Holland		52	Cultural and Ecological Consequences Hawai‘i’s ocean is deeply cultural—essential to Native Hawaiian voyaging, mo‘olelo, and subsistence. The continued intrusion of military activities into these waters: • Disrupts traditional fishing, navigational, and ceremonial practices. • Contradicts Hawai‘i’s stewardship responsibilities (mālama i ke kai). • Militarizes sacred marine spaces instead of protecting them. *Why Current Mitigation Falls Short* Current protective measures—such as marine mammal observers, sonar shutdown protocols, and modeling-based mitigation—do not address: • Long-distance acoustic effects that extend well beyond visual detection. • Lack of independent verification and surveillance of compliance. • Absence of community-accessible data and real-time monitoring.	The Proposed Action is described in Chapter 2 of the Final EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1, Alternative 1: Succeeding Real Estate Agreements) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2, Alternative 2: Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds). Neither action alternative includes additional development or change in current uses. This is why the EIS does not include details about military activities described in your comment. The environmental effects of training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5, Scope of Environmental Analysis of the Final EIS. The 2025 HCTT Final EIS/OEIS and the 2025	Cumulative Effects

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				• Failure to assess cumulative effects over decades and interactions with climate stressors.	PMRF LBTT Final EA include additional information about missiles launched from PMRF.	
0084	Fern Holland		53	Recommendations for Urgent Action To respect ecological and cultural integrity, I urge: 1. **Cancellation of RIMPAC exercises** until a full independent environmental and cultural review is completed, with community input and scientific transparency. 2. Prioritization of **marine sanctuary protections**, especially in culturally significant and environmentally sensitive areas. 3. An immediate moratorium on sonar and explosive training near **populated marine habitats**. 4. Mandatory **real-time monitoring with independent oversight**: a. Acoustic sensors, marine mammal tracking, b. Public access to environmental data. 5. Investment in c**ommunity-led marine stewardship and restoration**, including traditional Hawaiian practices and scientific collaborations. The multiple documented incidents of whale strandings and behavioral disruption linked to sonar and RIMPAC activity clearly demonstrate that these exercises are incompatible with Hawai'i's responsibility to protect its marine ecosystems. Continued operation without rigorous oversight and respect for cultural values perpetuates environmental injustice. Hawai'i must choose restorative protection over military convenience. RIMPAC must be suspended pending a transparent, community-centered review. Our ocean cannot wait.	1. Please see response to comment #50. 2. The Navy and NASA respect your concerns related to marine sanctuaries. However, marine sanctuary protections are outside the jurisdiction and scope of this EIS. The Project Area includes leasehold and easement lands, Figure 1-2 of the Final EIS. The Navy and NASA team suggests contacting government officials to voice concerns regarding marine sanctuaries. 3. The 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on marine resources and is located on the EIS website at https://pmrf-kpgo-eis.com/documents. 4. The Navy's Marine Species Monitoring Program website (https://www.navymarinespeciesmonitoring.us/) serves as an online portal for information on the background, history, and progress of the program, as well as provides access to reports, documentation, data, and updates on current monitoring projects. 5. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Outreach) of the Final EIS describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. The Navy and NASA are presenting Enhanced Engagements in the Final EIS under the action alternatives that promote protections for the land. These measures were developed based on feedback received from the public during the scoping and public comment period. These measures were referred to as Enhanced Management Measures (EMMs) in the Draft EIS and in the Final EIS they have been renamed and further developed based on public comments. The revised Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-4 discusses the development and continuation of PMRF Kaua'i which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders.	Ongoing Activities
0084	Fern Holland		54	6. Electromagnetic Radiation, High-Radiation Activities & Space Warfare The DEIS does not sufficiently assess the public health, cultural, and environmental implications of electromagnetic radiation (EMR), high-radiation activities, or the expansion of space warfare technologies at PMRF and NASA's Kaua'i Test Facility. Electromagnetic Radiation and Public Health NASA's operations at the Kaua'i Test Facility and PMRF's advanced systems involve powerful radar, satellite communication, and tracking technologies. While these are essential for mission objectives, chronic EMR exposure may have health implications for workers and nearby communities. Current research points to potential effects on human health, wildlife navigation, and pollinator populations. The DEIS only references EMR in passing without providing baseline data, cumulative exposure analysis, or compliance details regarding FCC and health safety thresholds for continuous emissions. This omission leaves major questions unanswered: • What are the maximum EMR levels during peak operations? • How far do radiation footprints extend into public or sensitive cultural areas? • Are there monitoring programs in place, and will results be made public?	The Kaua'i Test Facility is a launch facility located on Navy fee simple land and is operated by Sandia Laboratories for the Department of Energy. There are no operations conducted by NASA at this site. As discussed in Public Health and Safety (Section 3.9.1.4.4, Mākaha Ridge), a survey was conducted in 2020 to perform safety inspections on the hazards of electromagnetic radiation to personnel from radar operations. PMRF was granted a certification of compliance, and the survey found that PMRF was routinely implementing appropriate hazardous control measures. Due to these safety measures, the public is not exposed to any hazardous radiation. NASA operations at KPGO do not involve ionizing radiation, high-radiation activities, or space warfare technologies. The Proposed Action is limited to ground-based satellite communication and tracking using non-ionizing radiofrequency signals. The only radiofrequency-emitting system at KPGO is the Doppler Orbitography and Radiopositioning Integrated by Satellite (DORIS) beacon, which transmits in the 400 megahertz and 2 gigahertz bands to support satellite orbit determination and Earth	Public Health and Safety

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					science research. A November 2024 Radiation Protection Office (RPO) survey measured a maximum power density of 0.531 milliwatts per square centimeter (mW/cm^2) at 2 feet from the antenna—well below the 10 mW/cm^2 occupational exposure limit. The hazard area is limited to a 2.4-foot radius around the beacon. Because the antenna is mounted 20 feet above ground and located 450 feet from Kōkeʻe Road behind a forested buffer, no exposures occur in publicly accessible or culturally sensitive areas. NASA maintains a radiofrequency Safety Program with restricted access, signage, training, and monitoring in coordination with the RPO. A new sign has been posted, and a radiofrequency Safety Plan is being finalized. No impacts to wildlife or pollinators are expected, as individuals would have to remain within 2.5 feet of the beacon during transmission, which is not feasible. Accordingly, radiofrequency emissions at KPGO are non-ionizing, remain well within federal safety limits, and pose no risk to public health, cultural resources, or ecological communities.	
0084	Fern Holland		55	High-Radiation Activities and Space Warfare Risks The DEIS mentions missile defense, hypersonic weapons testing, and space-related operations, but fails to discuss the cumulative risks of militarization in outer space. Space warfare activities, including satellite interception or debris-producing tests, can have far-reaching implications for Hawaiʻi's skies, atmosphere, and even cultural practices tied to celestial observation. Further, accidental malfunctions or debris re-entry could introduce radioactive or toxic materials into our islands' ecosystems, a risk that must be analyzed under NEPA's mandate for comprehensive review.	The missions that PMRF supports are presented in Section 1.3 (Background) and Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Loss of Navy and NASA Mission Under the No Action Alternative); however, it is outside the scope of this EIS to consider cumulative risks of militarization in outer space.	Public Health and Safety
0084	Fern Holland		56	Recommendations: • Provide a full electromagnetic radiation risk assessment, including continuous monitoring, mapping of exposure zones, and public reporting; • Analyze the cumulative impacts of radar, communications, and missile-defense emissions on human health, cultural practices, and ecological systems; • Evaluate the potential consequences of space warfare testing, including debris, atmospheric pollution, and long-term sustainability risks; • Include independent third-party oversight for radiation safety compliance and mitigation; • Engage cultural practitioners to assess impacts on practices involving celestial navigation and star-based traditions.	As noted in response to comment #54, the Navy conducts regular radiation hazard surveys, which include risk assessments, every 5 years. Reports for electromagnetic radiation surveys conducted at PMRF contain sensitive information and not publicly available. As noted in response to comment #55, it is outside the scope of this EIS to consider cumulative risks of militarization in outer space. As noted in response to comment #41, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. PMRF Kauaʻi (https://pmrfkauai.com/) will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions. For NASA/celestial navigation, see response to comment #54.	Public Health and Safety
0084	Fern Holland		57	7. Access Rights, Hunting, and Traditional Gathering Practices One critical area insufficiently addressed in the Draft Environmental Impact Statement (DEIS) is the impact of PMRF operations and proposed lease renewals on public access and the exercise of traditional and customary practices, including fishing, gathering, and hunting. Historically, the lands and nearshore waters now under military use were integral to Native Hawaiian subsistence and cultural practices. Families from Kekaha, Waimea, and Niʻihau traditionally accessed these areas for gathering limu, fishing, crabbing, and hunting in the uplands. These practices are not recreational conveniences; they are constitutionally protected rights under the Hawaiʻi State Constitution (Article XII, Section 7) and affirmed in landmark cases such as *Ka Paʻakai o Ka ʻĀina v. Land Use Commission.* The DEIS does not demonstrate how PMRF will ensure that these rights are	At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. As described in Section 3.3, (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapuaʻa Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				preserved, exercised safely, and supported in perpetuity. Instead, it references existing “restricted access” zones without providing clear pathways for community engagement or accommodation of cultural and subsistence needs. Concerns: • Ongoing military restrictions limit shoreline and nearshore ocean access during training exercises, creating significant barriers for traditional practitioners. • The presence of unexploded ordnance (UXO) and other hazards on lands that were historically used for hunting and gathering presents a serious safety risk that remains unaddressed. • Lack of a transparent and enforceable policy on access means that Native Hawaiian and local community rights are effectively undermined by federal land control.	walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF’s shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and Section 3.5 (Land Use and Access) of the Final EIS, the Proposed Action would not change public access at PMRF for cultural activities. Please see response to comment #7 regarding UXO.	
0084	Fern Holland		58	Recommendations: **1. Formalize Access Rights and Protocols** a. Develop and adopt a clear access policy, co-created with Native Hawaiian cultural practitioners, subsistence fishers, and local hunting groups, to ensure the exercise of traditional practices continues without undue restriction. **2. Safety Provisions** a. Conduct comprehensive UXO clearance and contamination assessments before opening any area to public access. b. Implement a transparent communication system (including online updates and signage) for scheduled closures and hazards. **3. Community Engagement and Co-Management** a. Establish an Access Advisory Council composed of cultural practitioners, community members, and agency representatives to guide decisions related to access, safety, and traditional use. b. Incorporate access commitments into lease agreements to prevent future erosion of these rights. **4. Cultural Training for Military Personnel** a. Require PMRF and NASA staff to undergo training on Native Hawaiian cultural rights and customary practices, ensuring on-the-ground personnel respect and support lawful gathering and hunting activities. Access to ‘āina and kai is not just a convenience—it is a lifeline for cultural continuity, food security, and spiritual connection. The military’s use of these lands must never come at the expense of constitutionally protected rights and community well-being. Lease renewals should be conditioned upon enforceable guarantees that these rights will be honored, facilitated, and protected for generations to come.	At PMRF, coordination of access for cultural practices is guided by the PMRF ICRMP SOP #16 for providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF’s shoreline access areas are open with the exception of locations indicated by restricted area signage. Table 5.2-1 includes a summary of PMRF's proposal to develop an access management plan to streamline access for cultural practitioners (listed as Enhanced Engagement-2). Please see response to comment #7 regarding UXOs.	Cultural Practices
0084	Fern Holland		59	C. Stewardship & Environmental Restoration This section addresses critical areas where the Department of Defense, Navy, NASA, and the State must demonstrate genuine stewardship through concrete actions that heal environmental damage, support community resilience, and respect Native Hawaiian cultural values. 1. Biosecurity and Coconut Rhinoceros Beetle (CRB) Management The Draft Environmental Impact Statement (DEIS) mentions biosecurity and the Coconut Rhinoceros Beetle (CRB) only briefly (**Best Management Practices Section 2.44-45**), lacking a dedicated program to monitor, prevent, and manage this invasive species. This omission is a serious gap given the devastating impact CRB can have on Hawai‘i’s culturally and ecologically vital palms—coconuts and native species alike. The Navy’s long-term presence and land use at PMRF impose a kuleana to actively safeguard island ecosystems against new and spreading invasive threats. Without rigorous biosecurity and early detection programs, the community and environment remain vulnerable to irreversible harm. Recommendations:	Text has been added in Section 3.4.1 (Biological Resources/Affected Environment) of the Final EIS to elaborate on coconut rhinoceros beetle (CRB) management measures. PMRF implements extensive control measures, such as weekly pheromone trap checking, monthly advanced tree monitoring and inspections, covering of green waste with netting, and treatment of every potentially affected tree with a foliar spray. The Navy and NASA will continue to collaborate on management actions with Kaua‘i Invasive Species Committee (KISC), the CRB Hawai‘i Response Team, Division of Forestry and Wildlife (DOFAW), Department of Agriculture and Biosecurity (DAB), and NAVFAC. More information regarding CRB, such as protocols, education, and public engagement, can be found in Section 4.1.3 of the 2023 PMRF INRMP (Appendix K of the Final EIS). Early detection and rapid response (EDRR) for invasive vegetation and wildlife species is discussed in Section 3.4.1.4.1 (Biological Resources/Existing Conditions) and Section 3.4.1.4.4 (Biological Resources/Existing Conditions), respectively. The EDRR program is discussed in further detail in the 2023 PMRF INRMP (Appendix K of the Final EIS).	Biological Resources

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				• Develop and implement a comprehensive biosecurity program with routine monitoring and transparent reporting. • Establish formal, collaborative response protocols with the Hawai'i Department of Agriculture and other local agencies to rapidly address CRB outbreaks and other invasive species. • Promote community education and engagement to build widespread awareness and support for invasive species prevention and control efforts.	The Navy has plans to develop a PMRF Biosecurity Plan that includes specific prescriptions to evaluate individual invasive species, to identify targeted species, to control further spread of those targeted species, and to develop and implement a program to monitor invasive species abundance. The plan will be coordinated with the Regional Biosecurity Plan for Micronesia and Hawai'i as stated in Section 4.1.3 of the 2023 PMRF INRMP (Appendix K of the Final EIS).	
0084	Fern Holland		60	2. Wetland Protection and Restoration of the Mana Plain The DEIS acknowledges the existence of wetlands adjacent to PMRF—such as the Kawai'ele State Waterbird Sanctuary —and recognizes federally designated wetlands near the base boundary. However, it fails to commit to active restoration, expansion, or mitigation of wetland degradation. Historically, the Mana Plain was one of the largest and most productive wetland ecosystems in the Pacific, stretching from Waimea to Kekaha. This vast wetland system supported rich biodiversity and served critical environmental functions. The loss and degradation of these wetlands following colonization and military land use represent profound ecological and cultural harm. Recommendations: • The Navy must partner with local conservation groups, Native Hawaiian cultural practitioners, and government agencies to actively restore wetlands, enhance native habitat, and support community-based stewardship programs. • Funding and resources should be committed at a large scale to restore ecosystem functions, environmental services, and culturally significant landscapes. • Restoration efforts should be designed to reintegrate indigenous knowledge and practices, returning the Mana Plain toward its natural and cultural legacy.	The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued associated land use and activities on these lands. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. Please see comment #38 for response regarding wetland restoration in the Mānā Plain. As stated in Section 6.1.3 (Consistency with Government Plans and Policies/Kaua'i County General Plan, West Kaua'i Community Plan, Kaua'i Island Plan) of the Final EIS, the West Kaua'i Community Plan, Part IV, PMRF has increased its connection with Kekaha and the West Kaua'i Community.	Biological Resources
0084	Fern Holland		61	3. Housing Crisis and Social Displacement from Military Presence The DEIS omits any meaningful evaluation of the military's role in exacerbating Kaua'i's acute housing affordability crisis and social displacement. Military personnel and civilian contractors receive generous housing allowances that inflate local rental markets, placing upward pressure on rents in already stressed communities such as Kekaha, Waimea, and Hanapēpē. Additionally, large areas of land remain off-limits due to contamination or military restriction, further limiting available housing and development options. This dynamic disproportionately impacts Native Hawaiian families who already face historic marginalization, excessive land dispossession, and the enduring effects of failed state housing programs. Recommendations: • Conduct comprehensive studies and public disclosure of the military's contribution to local housing shortages and affordability issues, in compliance with NEPA's cumulative impact requirements. • Implement mitigation strategies that include land return or transfer for community housing, investment in affordable and transitional housing projects, and partnerships with county and state housing agencies. • Make such housing mitigation conditions mandatory prerequisites for any lease renewal or continued military land use.	The Navy and NASA respect your concerns regarding housing affordability on Kaua'i. As described in Section 2.1 (Proposed Action and Alternatives) of the Final EIS, the Proposed Action does not include the construction of any new housing. The distribution of military and civilian personnel and their dependents would continue to be more heavily concentrated in West Kaua'i due to the proximity to PMRF. Section 4.1.5 (Introduction to Analysis/Cumulative Effects) of the Final EIS includes description of the Waimea 400 Master Plan which is planning stages and includes plans for affordable housing.	Socioeconomics
0084	Fern Holland		62	4. Public Land Access, Cleanup, and Redevelopment Significant portions of PMRF lands remain inaccessible to the public due to contamination from unexploded ordnance (UXO), PFAS, and other legacy pollutants. The Draft EIS does not adequately ensure cleanup or outline community-centered restoration goals. Lease renewals must be explicitly conditioned on comprehensive environmental remediation efforts, especially for UXO and PFAS, paired with enforceable, binding	Please see response to comment #7 regarding UXO. The Hazardous Materials and Waste section (Section 3.12.1.4.1, Main Base) of the Final EIS has also been updated to include information on firefighting foams containing PFAS, typically known as AFFF. As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold, and easement lands at PMRF.	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				plans for land restoration and community use. This should include priorities such as affordable housing, substance abuse treatment facilities, regenerative agriculture, and open access for local residents. Successful models from other military-to-community transitions—such as Fort Devens, Massachusetts, and Brunswick Landing, Maine—illustrate the benefits of collaborative local redevelopment partnerships that center community priorities and healing. Recommendations: • Require environmental cleanup and restoration as conditions of lease renewal. • Mandate the development of a local redevelopment partnership including government, community groups, and the military to guide land use planning. • Prioritize community benefit and healing in redevelopment decisions, honoring the kuleana to restore and serve future generations.	Details regarding new lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. The Navy plans to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community, as discussed in Proposed Enhanced Engagements (Section 5.2) of the Final EIS. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/. As shown in (Table 4.1-1) of the Final EIS, the Waimea 400 Master Plan outlines the County of Kaua'i master plan for a 417-acre property which identifies community priorities. The Navy is committed to continue to be a good neighbor to the Waimea community and will continue to engage with the County of Kaua'i and other stakeholders throughout the development process.	
0084	Fern Holland		63	5. Federal Investment in Community Healing Programs Beyond its defense mission, the military has a broader responsibility to support Kaua'i's social well-being. There is a promising opportunity to create and fund community-based drug rehabilitation and transitional housing programs on non-operational military lands. Examples exist where repurposed military land has become a site for critical social services, fostering healing while rebuilding trust between military institutions and local communities. The Department of Defense possesses mechanisms, such as the Defense Community Infrastructure Program and Intergovernmental Support Agreements, to facilitate these partnerships and investments. Recommendations: • Require military agencies to partner with local nonprofits, health providers, and government bodies to develop and sustain drug rehabilitation and transitional housing initiatives on or adjacent to PMRF lands. • Establish these partnerships and investments as enforceable conditions for lease renewal or continued land use.	The Navy and NASA appreciate your commitment to your constituents who require additional social services. The Navy and NASA are committed to strengthening relationships with the community, and have developed Enhanced Engagement-4 to better facilitate communication with the public.	Socioeconomics
0084	Fern Holland		64	6. True Stewardship and Restorative Justice The Navy and NASA must move beyond mere regulatory compliance to embody genuine stewardship, guided by the principles of justice, kuleana, and aloha 'āina. This means: • Phasing out the use of harmful chemicals like PFAS and other "forever chemicals." • Leading large-scale efforts to restore wetlands and ecosystems in close partnership with the local community and Native Hawaiian stewards. • Providing sufficient funding and technical support to the County of Kaua'i for landfill cleanup and broader environmental restoration. • Addressing social inequities linked to military presence, including housing displacement and economic marginalization. • Respecting and uplifting Native Hawaiian cultural values, rights, and practices throughout environmental and land use decisions.	As noted in response to comment #20, all PFAS-containing firefighting equipment has been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. As noted in response to comment #38, the Navy is supporting native ecosystem restoration by creating an open floodable space on easement parcels on the Mānā Plain which will promote the regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds. This area is shown in Figure 3.7-6 in the Final EIS. As noted in response to comment #37, Kekaha landfill is owned, managed, and operated by the County of Kaua'i, and so any cleanup would be under the purview of the County of Kaua'i. Section 3.3 (Cultural Resources) of the Final EIS provides a focused summary of the findings of the Cultural Impact Assessment (CIA). Appendix F of the Final EIS contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment.	Ongoing Activities
0084	Fern Holland		65	D. Closing Statement The people of Kaua'i deserve nothing less than transparency, accountability, and a sincere commitment to healing both our 'āina and our communities. The Final	The Navy and NASA are presenting Enhanced Engagements in the Final EIS under the action alternatives that promote protections for the land. These measures were developed based on feedback received from the public during the scoping and public	EIS Process

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Environmental Impact Statement and any lease renewal decisions must embody these core values and support a future where environmental restoration, cultural integrity, and community well-being are paramount.	comment periods. These measures were referred to as EMMs in the Draft EIS and in the Final EIS they have been renamed and further developed based on public comments. The revised Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-4 discusses the development and continuation of PMRF Kaua'i which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders. Thank you for providing detailed comments and for your service to your community as a Kaua'i County Councilmember. Your robust participation in the EIS process is appreciated.	
0085	Daniel Cole		1	Please don't use any part of Kauai for missile practice. The environment is too fragile for that activity.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Effects to the environment from the Proposed Action have been analyzed by resource in Chapter 3.	General Opposition
0086	Gisele Bisch		1	The Draft Environmental Impact Statement fails to address the ongoing damage being done to the land, water, and ocean ecosystems of West Kauai. There is no meaningful analysis of climate change, and no acknowledgement of the desecration, militarization, and environmental racism these projects to continue to impose on our Peoples. As a Native Hawaiian, I demand no new leases on these stolen Hawaiian lands. I demand full cleanup and restoration, and the return of the land to Native Hawaiians.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns regarding natural ecosystems, cultural sites, climate change, public health, and other concerns. Responses to your concerns are addressed below. Water Resources within the ROI include groundwater, surface water, floodplains, and wetlands as discussed in Section 3.7 (Water Resources) of the Final EIS. This section includes a list of best management practices and standard operating procedures used for water resource management (Table 3.7-2) in the Final EIS. Threats to endangered species are discussed in Biological Resources (Section 3.4.1.4, Existing Conditions and Section 3.4.2, Environmental Consequences) of the Final EIS. Additionally, several more threats are discussed in multiple sections in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) (Appendix K of the Final EIS), such as invasive species, predictable environmental trends, and predation. The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As described in Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					and NASA. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0087	Anne Shiparski		1	Aloha e, My name is Anne Shiparski, and I am writing to express strong opposition to the proposed lease renewals at the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory. As someone who lives in Hawaiʻi and is deeply committed to environmental and cultural justice, I am disturbed by the inadequacy of the Draft Environmental Impact Statement. It fails to account for the ongoing desecration of sacred lands, harm to native ecosystems and endangered species, and the long-term health consequences of militarization for local communities. This is not a neutral issue. The U.S. military's continued use of Hawaiian lands perpetuates a legacy of occupation, environmental racism, and systemic violence against Kānaka Maoli. There is no justification for continuing these leases for another 30 years. What is needed is full remediation of the land, not further damage. I urge you to reject the lease renewals, conduct a full cleanup, and return ʻāina to Kānaka Maoli. Mahalo for your time and consideration, Anne Shiparski Oʻahu	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Your opposition to the Proposed Action is noted. Effects to general species, to include native and endangered species, from the Proposed Action are described in detail by location in Section 3.4.2 (Biological Resources/Environmental Consequences) in the Final EIS. Section 3.3.2 (Cultural Practices/Environmental Consequences) summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. As stated in Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS, pursuant to the terms of the current real estate agreements, at the expiration of the leases and easements, any return of State property would involve complex negotiations and collaboration with the State to determine the condition of the returned lands.	General Opposition
0088	Leonani Puaa		1	To Whom It May Concern, I submit this testimony in strong opposition to the U.S. Navy and NASA's proposal to renew and extend leases on over 8,000 acres of Hawaiian lands on the island of Kauaʻi for an additional 30 years. These lands—stolen from the Native Hawaiian people through illegal occupation and coercive land policies—have long suffered under the weight of militarization, desecration, and environmental degradation. The continued use and control of these lands by the U.S. military and federal agencies is a direct perpetuation of historical injustice and colonial violence. No new leases should be granted. Period. For decades, these lands—rich in cultural significance, ecological diversity, and ancestral value—have	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. At this time, the land is under State jurisdiction by the Department of the Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				been subjected to bombing, weapons testing, surveillance infrastructure, and militarized operations. Native Hawaiians have been forcibly separated from the ʻāina (land), and the natural environment has endured irreversible harm. The idea of extending this arrangement for another generation is unconscionable.	Cultural Practices is discussed in Section 3.3 (Cultural Practices) of the Final EIS. As described in Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date Integrated Cultural Resources Management Plan (ICRMP). The ICRMP is a plan that provides coordinated management of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. At PMRF, coordination of access for cultural practices is guided by the PMRF ICRMP Standard Operating Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage.	
0088	Leonani Puaa		2	I demand the following: 1. NO NEW LEASES. The U.S. Navy and NASA have no moral, cultural, or legal right to these lands. The existing leases should be allowed to expire, and no extensions or renewals should be granted. 2. FULL ACCOUNTABILITY. A thorough and transparent investigation must be conducted to assess the extent of cultural, ecological, and environmental harm caused by military and aerospace activity on these lands. 3. COMPREHENSIVE CLEANUP AND RESTORATION. The U.S. government must be held responsible for the environmental damage done and must allocate the resources necessary for the full restoration of these lands—removing unexploded ordnance, remediating soil and water contamination, and restoring native ecosystems. 4. RETURN OF LAND TO NATIVE HAWAIIANS. These lands must be returned to the stewardship of Kānaka Maoli (Native Hawaiians)—those whose genealogical, spiritual, and cultural ties to the ʻāina predate U.S. occupation. The land must be restored to its rightful caretakers to ensure its protection and regeneration for generations to come. As caretakers of this sacred place, the Native Hawaiian people have never relinquished their inherent sovereignty or the right to determine the future of their lands. The further entrenchment of militarization not only violates these rights but directly contradicts the Navy's stated commitments to environmental stewardship and cultural respect. Enough is enough. The era of military expansion at the expense of Native peoples, lands, and ecosystems must come to an end. The EIS process must not be a formality to rubber-stamp yet another 30 years of destruction—it must be a turning point. Let it reflect justice, healing, and the long-overdue return of lands to their rightful stewards. With deep respect for the ʻāina and its people, Leonani Kahookano Puaa Kaunakakai, Hawaii August 07th, 2025	PMRF also maintains an up-to-date INRMP Integrated Natural Resources Management Plan (INRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. There is no unexploded ordnance on leasehold and easement lands. The Final EIS includes updated information on the upcoming remedial investigation at the former firefighting training site in Section 3.12 (Hazardous Materials and Waste). The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all National Environmental Policy Act/HEPA (Hawai'i Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives.	General Opposition
0089	Lauren Mangini		1	I am writing to demand that there be no new leases. The draft EIS does not account for the entire spectrum of harm (i.e. impact) on the land and waters. Aside from harm to the environment (land, water/ocean ecosystems and endangered species), there is the threat to sacred sites. The sacred sites are on land that belong to the Kanaka Maoli, and continued occupation without return, restoration or reparations is unconscionable. The draft EIS also lacks analysis on climate change impacts or long-term community health. This is not solely about environment and the land (though there are plenty of concerns not addressed in the draft EIS) - the critical issue is sovereignty of the Kanaka Maoli people and ending the racist occupation and desecration of their lands. I support not renewing the leases.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your opposition to the Proposed Action is noted. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS.	General Opposition
0090	Alexx Sanchez		1	FREE HAWAII! WE DEMAND LAND BACK	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition

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0091	Cesarkeerm CesarkeermBT		1	https://auctionwheels.info/lots/40345386	Comment noted.	
0092	Lori Kizer		1	I oppose the renewal. After the Navy recently poisoned 1000's on Oahu, lied, and tried to cover up how can anyone trust them? The war games, the bombings, the weapons testing and the damage being done to the marine ecosystem is all disgustingly insane in my opinion.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition
0093	Alana Kamaile		1	GIVE US BACK OUR ʻĀINA YOU GREEDY HAOLE!	The Navy and NASA note your opposition to the Proposed Action.	General Opposition
0094	Paul Dozier		1	In light of the desecration and ruin of this Native site on Kauai Island, I wish to deny the US Navy the right to continue its occupation there. I'm aware of the great expense requirements for this withdrawal. Please remember the recent allocation of extra federal funding to the Pentagon; use a little of that for this project.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition
0095	Shyanne Olores		1	Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth I, Shyanne Olores, a Kanaka Maoli and descendant of Mana, Nohili, and the Hawaiian Kingdom, submit this testimony as a formal Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth. I object to the lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kaua'i. This testimony is submitted on the record in defense of the land, people, and rightful sovereign status of Hawai'i. As a descendant of Mana, my lineage, rights, and responsibilities to this ʻāina are protected by both natural law and international law. My grandparents were the last of our ʻohana to reside in Mana town. I was raised in Nohili, fishing and gathering, visiting the dunes where my ancestors — our iwi kupuna — are buried. My father and his brothers hunted in the Mana tunnels to feed our family. These lands are not abstract to me — they are my genealogy, my truth, my kuleana. This land — and all lands under PMRF — remain the territory of the Hawaiian Kingdom. I give Notice of Fact: The illegal overthrow of the Hawaiian Kingdom in 1893 was acknowledged by the U.S. government in the 1993 Apology Resolution. No treaty of annexation was ever ratified. Therefore, the United States has no legal claim to the lands it currently occupies at PMRF. I declare that the presence of the U.S. military on Hawaiian Kingdom lands constitutes ongoing illegal occupation. There is no lawful lease to renew. You cannot lease what was stolen. This land was never ceded. Kanaka Maoli have never relinquished our claims. The United States has no jurisdiction here. Over the past seven years, seven members of my ʻohana from Mana and Kekaha have died from cancer. Each of them worked in agriculture on the west side of Kaua'i. These are not isolated incidents. They are the result of environmental violence committed by the U.S. military. PFAS — forever chemicals — were identified in PMRF soil and groundwater as far back as the 1960s. And yet, no cleanup has occurred. The Navy's promise of 'remediation forthcoming' is not a solution — it is a continuation of harm. I object to the poisoning of our land and people under the guise of national security.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciate the information you provided about your family lineage. The Navy and NASA respect your concerns regarding military operations and cultural practices. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. The Navy and NASA respect your concern regarding concern over cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. In Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	Land Use and Access
0095	Shyanne Olores		2	I further give Notice of Fact that the Draft Environmental Impact Statement fails to account for cumulative impacts — including those of RIMPAC, live-fire drills, missile tests, and global weapons transfers that are directly linked to U.S. military activity at PMRF. The DEIS ignores environmental, cultural, and international legal consequences. This is not oversight — it is systemic erasure. As a Kanaka Maoli with ancestral ties to this land, I reject all options within this DEIS. I do not consent to continued occupation, expansion, or mitigation. I invoke my inherent rights to land,	The Rim of the Pacific (RIMPAC) exercise, live-fire drills, missile tests, and global weapons transfers are outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from	Cumulative Effects

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				culture, and life. Therefore, I declare the following lawful demands: 1. The immediate termination of all military leases and operations on Hawaiian Kingdom land at PMRF. 2. Full cleanup of PFAS, fuel, and hazardous waste contamination. 3. Restoration of sacred sites, including the dunes at Nohili. 4. Full return of all lands under PMRF to the rightful stewards — the Kanaka Maoli. The U.S. military's continued presence on these lands, without consent, constitutes an act of aggression. It violates the principles of international law, natural law, and the rights of Indigenous peoples as outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). This is not America. This is the Hawaiian Kingdom. These are our lands. I stand in lawful objection, and I do so with the authority of my kūpuna behind me. I will not be silent while our people die and our lands are desecrated. He Hawai'i au. I do not stand alone. Submitted in truth, honor, and defense of the 'āina, Shyanne Olores	PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. 1)Your opposition to the Proposed Action has been noted. 2) Please see response to comment #1 for more information on the ongoing PFAS investigation and upcoming remedial investigation. There are no tanks with active fuel leaks at PMRF. As discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS, all hazardous waste produced on leasehold and easement lands is handled, managed, and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. 3) Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. 4) Your opposition to the Proposed Action is noted. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	
0095	Shyanne Olores		3	Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth I, Shyanne Olores, a Kanaka Maoli and descendant of Mana, Nohili, and the Hawaiian Kingdom, submit this testimony as a formal Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth. I object to the lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kaua'i. This testimony is submitted on the record in defense of the land, people, and rightful sovereign status of Hawai'i. As a descendant of Mana, my lineage, rights, and responsibilities to this 'āina are protected by both natural law and international law. My grandparents were the last of our 'ohana to reside in Mana town. I was raised in Nohili, fishing and gathering, visiting the dunes where my ancestors — our iwi kupuna — are buried. My father and his brothers hunted in the Mana tunnels to feed our family. These lands are not abstract to me — they are my genealogy, my truth, my kuleana. This land — and all lands under PMRF — remain the territory of the Hawaiian Kingdom. I give Notice of Fact: The illegal overthrow of the Hawaiian Kingdom in 1893 was acknowledged by the U.S. government in the 1993 Apology Resolution. No treaty of annexation was ever ratified. Therefore, the United States has no legal claim to the lands it currently occupies at PMRF. I declare that the presence of the U.S. military on Hawaiian Kingdom lands constitutes ongoing illegal occupation. There is no lawful lease to renew. You cannot lease what	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciates the information you provided about your family lineage. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concern regarding concern over cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Please see response to comment #1 which addresses the upcoming remedial investigation for PFAS at the former firefighting training site.	Cultural Practices

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				was stolen. This land was never ceded. Kanaka Maoli have never relinquished our claims. The United States has no jurisdiction here. Over the past seven years, seven members of my ‘ohana from Mana and Kekaha have died from cancer. Each of them worked in agriculture on the west side of Kaua‘i. These are not isolated incidents. They are the result of environmental violence committed by the U.S. military. PFAS — forever chemicals — were identified in PMRF soil and groundwater as far back as the 1960s. And yet, no cleanup has occurred. The Navy's promise of 'remediation forthcoming' is not a solution — it is a continuation of harm. I object to the poisoning of our land and people under the guise of national security.		
0095	Shyanne Olores		4	I further give Notice of Fact that the Draft Environmental Impact Statement fails to account for cumulative impacts — including those of RIMPAC, live-fire drills, missile tests, and global weapons transfers that are directly linked to U.S. military activity at PMRF. The DEIS ignores environmental, cultural, and international legal consequences. This is not oversight — it is systemic erasure. As a Kanaka Maoli with ancestral ties to this land, I reject all options within this DEIS. I do not consent to continued occupation, expansion, or mitigation. I invoke my inherent rights to land, culture, and life. Therefore, I declare the following lawful demands: 1. The immediate termination of all military leases and operations on Hawaiian Kingdom land at PMRF. 2. Full cleanup of PFAS, fuel, and hazardous waste contamination. 3. Restoration of sacred sites, including the dunes at Nohili. 4. Full return of all lands under PMRF to the rightful stewards — the Kanaka Maoli. The U.S. military's continued presence on these lands, without consent, constitutes an act of aggression. It violates the principles of international law, natural law, and the rights of Indigenous peoples as outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). This is not America. This is the Hawaiian Kingdom. These are our lands. I stand in lawful objection, and I do so with the authority of my kūpuna behind me. I will not be silent while our people die and our lands are desecrated. He Hawai‘i au. I do not stand alone. Submitted in truth, honor, and defense of the ‘āina, Shyanne Olores	The RIMPAC exercise, live-fire drills, missile tests, and global weapons transfers are outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands; therefore, marine resources are not covered in the scope of this EIS. 1) Your opposition to the Proposed Action is noted. 2) Please see response to comment #1 for more information on the ongoing PFAS investigation and upcoming remedial investigation. There are no tanks with active fuel leaks at PMRF. As discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS, all hazardous waste produced on leasehold and easement lands is handled, managed and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. 3) Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At PMRF, coordination of access for cultural practices is guided by the PMRF ICRMP SOP #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF’s shoreline access areas are open with the exception of locations demarcated by restricted area signage. 4) The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	Cumulative Effects
0096	Cheryl Hendrickson		1	Aloha Ms. Kerry Ling- Please refuse to renew US Navy and NASA leases on Kaua'i. Their draft EIS fails to access the full scope of harm by ignoring impacts to land, water, ocean ecosystems, endangered species, sacred sites and the health of surrounding communities. There is no analyses of climate change impacts or acknowledgement of the desecration already taken place. We demand a full clean up and restoration. Many Mahalos, Cheryl Hendrickson 40 year Kama'aina	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your opposition to the Proposed Action is noted. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai‘i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai‘i Revised Statutes Chapter 343. “The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application.” The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential	Biological Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS. Also, in order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends is discussed in each resource section of the Final EIS.	
0097	Felicidy Fidez Phimmasone		1	Written Comment on the 2025 Draft Environmental Impact Statement Pacific Missile Range Facility (PMRF), Mānā, Kaua'i Submitted by: Felicidy Fidez Phimmasone Affiliation: Community member of Ko Hawai'i Pae 'Āina, Research Assistant at Māpuna Lab, and Master in Public Health Student at UH Mānoa Date: August 6, 2025 To Whom It May Concern, I submit this testimony in direct response to the 2025 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Navy and NASA regarding activities at the Pacific Missile Range Facility (PMRF) in Mānā, Kaua'i. I find it incomplete, inadequate, and deeply flawed in both legal standing and cultural impact analysis. The proposed actions must be halted, and the DEIS withdrawn or significantly revised.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1 and the rules implementing Hawai'i Revised Statutes Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1 and in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS. The updated Cultural Impact Assessment may be found in Appendix F of the Final EIS. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS.	General Opposition
0097	Felicidy Fidez Phimmasone		2	First, the legal status of the lands are seized, not ceded. The DEIS repeatedly refers to the subject lands as "ceded." This classification is factually and legally false. These lands were seized without consent or lawful treaty of annexation and remain under illegal military control. The Hawaiian Kingdom was recognized as a sovereign nation by the U.S. and many other countries, and no lawful transfer of its national lands has ever occurred. Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S. Constitution's recognition of treaties as the supreme law of the land (Article VI).	At this time, the land is under State jurisdiction by the Department of the Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0097	Felicidy Fidez Phimmasone		3	Second, The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with verifiable, public-facing documentation: • Perchlorate contamination from solid rocket fuel used in missile launches and related propulsion testing. • PFAS contamination, especially in light of the known airplane fire incident at PMRF in 2020 (source: *Honolulu Civil Beat, "Toxic Foam from Military Fire Training Raises Concerns on Kaua'i," 2021*). • The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials.	The Final EIS discloses information on perchlorate testing at PMRF in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well). Although propulsion testing is outside the scope of this EIS, the EIS team has provided a link below to a publicly available paper published by the U.S. Environmental Protection Agency (EPA), which found that perchlorate does not accumulate in soil or water, and that there were no significant differences in perchlorate concentrations in soil samples at testing ranges before or after firing missiles. This information can also be found in the 2024 Hawaii-California Training and Testing EIS/OEIS in Section 3.2 of that document. An online, pdf version of the paper published by the EPA can be found online at https://semspub.epa.gov/work/HQ/159615.pdf.	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?	As discussed in further detail in Water Resources (Section 3.7.1.4.1.2, Mānā Water Well) of the Final EIS, per Navy Perchlorate Sampling and Management Policy, sampling for perchlorate has been conducted at the two drinking water supply locations, and concentrations at both sites were within the allowed screening level. Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service (USFWS) through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the EPA screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. As discussed in Public Health and Safety (Section 3.9.1.4.4, Mākaha Ridge), a survey was conducted in 2020 to perform safety inspections on the hazards of electromagnetic radiation to personnel from radar operations. PMRF was granted a certification of compliance, and the survey found that PMRF was routinely implementing appropriate hazardous control measures. Due to these safety measures, the public is not exposed to any hazardous radiation. Effects from aerial and underwater testing are not included in the Proposed Action analyzed by this EIS. As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. Effects from testing and training activities were analyzed in previous PMRF National Environmental Policy Act (NEPA) documents and are presented in Table 1-5 of the Final EIS. These documents describe the mitigation measures already in place to reduce adverse effects from these activities. Effects from proposed changes to ongoing activities are analyzed in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/OEIS and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the	

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0097	Felicidy Fidez Phimmasone		4	Third, the cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including: • Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades. • Leina a ka ʻuhane (leaping places of the soul), which are located in proximity to PMRF training zones. • Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access. • Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity. Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "paʻakai analysis" (as required under Hawaiʻi's environmental review framework) cannot be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.	Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the Cultural Impact Assessment (CIA). Appendix F of the Final EIS contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment.	Cultural Practices
0097	Felicidy Fidez Phimmasone		5	Fourth, this DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include: • No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors. • No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region. • No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities—especially children—living near military activity zones. • No generational impact assessment on future health, land use, or cultural restoration. This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory. Finally and most importantly, this land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestor. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us. Instead, it harms us, visibly and invisibly.	As described in Chapter 3 (Affected Environment and Environmental Consequences) of the Final EIS, the approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives in Chapter 3 of the Final EIS. Consistent with HAR section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4. Section 4.1.5 (Introduction to Analysis/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified. Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the CIA report found in Appendix F in the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. Executive Orders 12898 and 14096 (which included a whole-of-government approach to Environmental Justice) were revoked on January 21, 2025; however, see Sections 3.3 (Cultural Practices), 3.6 (Socioeconomics), and 3.5 (Land Use and Access) for relevant analyses in the Final EIS.	Socioeconomics
0097	Felicidy Fidez Phimmasone		6	The Navy and NASA must: 1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures. 2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments. 3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners. 4. Acknowledge the land as Hawaiian national land seized without consent, and stop	Thank you for sharing your connection to the land and your feelings about the activities at PMRF. In response to your list of demands, the Navy and NASA note: 1) The EIS has been prepared consistent with the current federal and State legal framework. 2) Please see response to comment #3 regarding perchlorate testing and future management of PFAS at the former firefighting training site on leased lands.	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				referring to it as “ceded.” 5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established. Mahalo for your time. Please understand that this testimony is not only for today, but for the next seven generations. Onipa‘a Kākou, Felicidy Fidez Phimmasone felicidy@hawaii.edu	3) Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the CIA. Appendix F in the Final EIS contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment. 4) The history of land tenure in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. 5) As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, “Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis)” of the Final EIS.	
0097	Felicidy Fidez Phimmasone		7	Written Comment on the 2025 Draft Environmental Impact Statement Pacific Missile Range Facility (PMRF), Mānā, Kaua‘i Submitted by: Felicidy Fidez Phimmasone Affiliation: Community member of Ko Hawai‘i Pae ‘Āina, Research Assistant at Māpuna Lab, and Master in Public Health Student at UH Mānoa Date: August 6, 2025 To Whom It May Concern, I submit this testimony in direct response to the 2025 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Navy and NASA regarding activities at the Pacific Missile Range Facility (PMRF) in Mānā, Kaua‘i. I find it incomplete, inadequate, and deeply flawed in both legal standing and cultural impact analysis. The proposed actions must be halted, and the DEIS withdrawn or significantly revised.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The updated CIA may be found in Appendix F of the Final EIS. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with HAR Chapter 11-200.1 and the rules implementing HRS Chapter 343. “The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application.” The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1 and in accordance with the following: NEPA (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS. The updated CIA may be found in Appendix F of the Final EIS. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS.	EIS Process
0097	Felicidy Fidez Phimmasone		8	First, the legal status of the lands are seized, not ceded. The DEIS repeatedly refers to the subject lands as “ceded.” This classification is factually and legally false. These lands were seized without consent or lawful treaty of annexation and remain under illegal military control. The Hawaiian Kingdom was recognized as a sovereign nation by the U.S. and many other countries, and no lawful transfer of its national lands has ever occurred. Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S. Constitution’s recognition of treaties as the supreme law of the land (Article VI).	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0097	Felicidy Fidez Phimmasone		9	Second, The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with	The Final EIS discloses information on perchlorate testing at PMRF in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) of the Final EIS.	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				verifiable, public-facing documentation: • Perchlorate contamination from solid rocket fuel used in missile launches and related propulsion testing. • PFAS contamination, especially in light of the known airplane fire incident at PMRF in 2020 (source: Honolulu Civil Beat, "Toxic Foam from Military Fire Training Raises Concerns on Kaua'i," 2021). • The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials. Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?	Although propulsion testing is outside the scope of this EIS, the Navy and NASA have provided a link below to a publicly available paper published by the EPA, which found that perchlorate does not accumulate in soil or water, and that there were no significant differences in perchlorate concentrations in soil samples at testing ranges before or after firing missiles. This information can also be found in the 2025 HCTT Final EIS/OEIS in Section 3.2 of that document. An online, pdf version of the paper published by the EPA can be found online at https://semspub.epa.gov/work/HQ/159615.pdf. As discussed in further detail in Water Resources (Section 3.7.1.4.1.2, Mānā Water Well) of the Final EIS, per Navy Perchlorate Sampling and Management Policy, sampling for perchlorate has been conducted at the two drinking water supply locations, and concentrations at both sites were within the allowed screening level. Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the HDOH and USFWS through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the EPA screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the HDOH during the remedial investigation process. Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as AFFF. As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. As discussed in Public Health and Safety (Section 3.9.1.4.4, Mākaha Ridge), a survey was conducted in 2020 to perform safety inspections on the hazards of electromagnetic radiation to personnel from radar operations. PMRF was granted a certification of compliance, and the survey found that PMRF was routinely implementing appropriate hazardous control measures. Due to these safety measures, the public is not exposed to any hazardous radiation. Effects from aerial and underwater testing are not included in the Proposed Action analyzed by this EIS. As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. Effects from testing and training activities were analyzed in previous PMRF NEPA documents and are presented in Table 1-5 of the Final EIS. These documents describe the mitigation measures already in place to reduce adverse effects from these activities. Effects from proposed changes to ongoing activities are analyzed in the 2025 HCTT Final EIS/OEIS and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no	

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0097	Felicidy Fidez Phimmasone		10	Third, the cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including: • Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades. • Leina a ka ʻuhane (leaping places of the soul), which are located in proximity to PMRF training zones. • Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access. • Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity. Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "paʻakai analysis" (as required under Hawaiʻi's environmental review framework) cannot be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.	Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the CIA. Appendix F of the Final EIS contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment.	Cultural Practices
0097	Felicidy Fidez Phimmasone		11	Fourth, this DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include: • No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors. • No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region. • No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities—especially children—living near military activity zones. • No generational impact assessment on future health, land use, or cultural restoration. This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory. Finally and most importantly, this land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestor. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us. Instead, it harms us, visibly and invisibly.	As described in Chapter 3 (Affected Environment and Environmental Consequences) of the Final EIS, the approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives in Chapter 3 of the Final EIS. Consistent with HAR section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4. Section 4.1.5 (Cumulative Effects/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified. Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the CIA report found in Appendix F, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS.	Cumulative Effects
0097	Felicidy Fidez Phimmasone		12	The Navy and NASA must: 1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures. 2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments. 3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners. 4. Acknowledge the land as Hawaiian national land seized without consent, and stop	Thank you for sharing your connection to the land and your feelings about the activities at PMRF. In response to your list of demands, the Navy and NASA note: 1) The EIS has been prepared consistent with the current federal and State legal framework. 2) Please see response to comment #9 regarding perchlorate testing and future management of PFAS at the former firefighting site on leased lands.	Land Use and Access

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				referring to it as “ceded.” 5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established. Mahalo for your time. Please understand that this testimony is not only for today, but for the next seven generations. Onipa‘a Kākou, Felicidy Fidez Phimmasone felicidy@hawaii.edu	3) Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the CIA. Appendix F contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment. 4) The history of land tenure in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. 5) As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, “Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS.	
0098	Kimmer “Nahonu” Horsen Bighorse		1	Aloha Navy EIS Officer, Aole! Aole! Aole! My name is Kimmer Bighorse and have been stationed at Schofield Barracks as a light and heavy wheel diesel vehicle mechanic/Soldier at first in 2008. I enlisted for the Global war on terrorism in March 2002 where I served in many middle east and overseas tours including Germany, Hawaii, Iraq, Qatar, Texas, California and Afghanistan. Since then, I never in my active duty Army career, witnessed the destruction and neglect of the environment as abuse in Hawaii’s oceans, skies, space, and land bases by the United States military. Native Hawaiians or Kanaka Maoli of the Hawaiian Kingdom have been monitoring their wahi pana land bases such as Barking Missil Range, Kauai, Kokee Observatory, Pohakuloa since 1957. This is why I recommend getting rid of the missile ranges, SONAR test submarine test sites, field artillery ranges, armor combat units from Hawaii entirely as there is simply not enough room for their equipment, personnel or families. Not only that, the hazardous materials, contamination and pollution from such destruction of field training, ordnance detonation contamination is not disposed of properly. This would never occur in Germany, Iraq, Afghanistan or Kuwait who each have a heavily armed arsenal, military, even terrorist organizations inflicting violence on U.S. military personnel. Germany monitors the United States base environmental impact. Even so, the German Bundeshwehr did not renew their United States military leases, evicted much of the the United States military and downsized US forces.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to the presence of military operations on Hawai‘i. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. The Final EIS also includes a discussion on the Navy’s adherence to applicable State and federal regulations regarding the disposal of hazardous or toxic wastes in Section 3.12 (Hazardous Materials and Waste).	General Opposition
0098	Kimmer “Nahonu” Horsen Bighorse		2	I recommend downsizing the active duty personnel here on all islands to the bare minimum as the United States is belligerently occupying and destroying Hawaii Pae Aina, its people and environment since 1893. The following are specific examples of the war crimes being committed by the United States military. On December 6, 2019, a Pearl Harbor Sailor Machinist Mate Auxilliary Fireman Gabriel Antonio Romero shot two department of defense personnel, injured Roger Nakamine and then shot himself. On July 12, 2024, PFC Dewayne Johnson murdered and dismembered his wife’s body in a trash dumpster on Schofield Barracks Hawaii. On January 2021 SPC Raul Hernandez Perez struck his wife in the back of the head with a baseball bat, stabbed her in the back then dismembered her body into a trash dumpster on Schofield Barracks Hawaii.	Thank you for your comment.	General Opposition

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				Since 2019 Operation Keiki Shield 18 has the Hawaii ICAC Task force has arrested more than 108 individuals perpetrators and child predators, Marines, Soldiers, Sailors, Coast Guard and Air Force alike. 3 arrests were made during Operation Keiki Shield Kauai. Under international law, the United States must enforce the laws of the Occupied State, the Hawaiian Kingdom. As such, Barking Sands needs to be de-occupied, decontaminated of UXOs, depleted uranium and any other ordnance in the land, water and oceans by the United States Navy. The belligerent military occupation and pillaging of such Hawaiian Kingdom lands, oceans, waterways is a an active crime against humanity. On August 8-16, 2023, Lahaina wildfires killled 108 Lahaina citizens and 2 went missing. The damage has been estimated to be 6 billion while FEMA estimated more than 2200 buildings burned. The United States Navy could have deployed their submarines, cruise ships, destroyers, vessels and planes to assist in putting out the fires and saving countless lives and properties. The United States Navy at both Pearl Harbor and Barking Sands Missile range were apathetic and indifferent while an entire city of men, women, children and pets were torched. Hawaii cannot have such neglect, abuse and blatant apathy present on its sacred lands.		
0098	Kimmer "Nahonu" Horsen Bighorse		3	President Bill Clinton confessed, recognized and apologized for the belligerent overthrow of the Hawaiian Kingdom in 1893 but to this day, did nothing to offer remittance or restitution for the war crimes still being committed today. Navy personnel and military personnel contribute to the sex trafficking industry in Hawaii more than any other occupation. Native Hawaiian wahine suffer an exploitation epidemic at the hand of belligerent occupation. Kanaka Maoli, Native Hawaiian Opio suffer the most suicide ideation, attempt and lethal suicide more than any other racial and age demographic in Hawaii. Belligerent military occupation adversely effects the mental, spiritual, physical, and emotional health of all Kanaka Maoli Kingdom subjects: depression, anxiety, loss, homelessness, child abuse, poverty, mental disorders, and mood disorders. Addiction and houselessness are a result of belligerent occupation, the destruction of the environment, the ocean, the wahi pana, sky pollution, destruction of sacred sites, heiau, burial grounds that adversely effect Hawaiian subjects mental health, the Hawaiian Nationals who experience violent United States Navy military occupation daily.	Thank you for your comment.	Cultural Practices
0098	Kimmer "Nahonu" Horsen Bighorse		4	Native Hawaiians are denied access to their sacred sites, oceans, on bases and military reservations, banned from ensuring the United States Navy disposes and decontaminates its live fire and submarine SONAR exercise training debris. Dead whales wash up on shore because of the violent SONAR sounds the submarines make causing the whales, honu and endangered Hawaiian monk seals deaf. I reiterate the United States Navy complies with the endless contamination of our Halawa Shaft on Oahu that hydrates much of Moanalua military personnel, Pearl Harbor and Hickam bases. PFAS has been detected as well as toxic lead at the Army firing range Puuloa in Ewa Beach. Does the Army really need endless inventories of Abrams, Bradley tanks, heavy armor equipment vehicles, Strykers, 5-ton trucks, Howitzers, Patriot missile launchers for land battles like WWII? Even though there are other militaries with nuclear powers building up, strategic war planning, and storing their arsenal the world over, the keiki o ka aina would rather restore their lands, oceans, air and space than further contaminate and pollute their sacred water resources and wahi pana. There are other locations for the United States to stock their heavy armor equipment and munitions other than the already overcrowded, overpopulated Oahu, Big Island, Kauai, Maui, Kahoolawe, Lanai and	At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapuaʻa Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and Section 3.5 (Land Use and Access) of the Final EIS, the Proposed Action would not change public access at PMRF for cultural activities.	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				outlying islands such as Polaniku; desserted locations such as the Mojave Desert in California. I recommend sending EOD expolsive disposal units into clean up the deadly depleted uranium buildup, unexploded ordnance and deoccupy Barking Sands missile range immediately. Allow Hawaiian cultural practitioners, kupuna, Kumu supervise the decontamination. Do NOT accept the Navy's version of an environmental impact statement. E malama pono, Aloha aina, Aloha Wai, Aloha Wakea, Aloha Kanaloa Kimmer (Nahonu) Bighorse Horsen 10 year United States Army Veteran Turtle Clan	In Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (HDOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the HDOH during the remedial investigation process. There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land. Recently, during an infrastructure upgrade project conducted on Barking Sands, it was determined that a full Explosive Safety Submittal was required in that project area, (over 7 miles of area), and several pieces of munitions and explosives of concern were located and disposed. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0098	Kimmer "Nahonu" Horsen Bighorse		5	P.S. I am submitting this testimony on behalf of myself, as well as in solidarity with Native Hawaiians, environmentalists, water protectors, and all who care deeply about the health of our oceans, the protection of marine life, and the preservation of cultural and sacred practices tied to the moana (ocean). I am deeply concerned about the inadequacies and misleading statements in the Draft Environmental Impact Statement (EIS) and Overseas Environmental Impact Statement (OEIS) for the Hawaii-California Training and Testing (HCTT) activities. Here is an outline of some of the issues in the documents, hereafter called the EIS or and he . It is not comprehensive, because despite regulations that the maximum size of an EIS is 300 pages, this document is 4 volumes long with the first volume alone being over 700 pages. It is a blatant violation of the regulation and makes the document unreadable to community members, but here are some highlights.	The Navy and NASA respect your concerns related to other NEPA documents. However, the 2025 HCTT Final EIS/OEIS is outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting the parties responsible for the 2025 HCTT Final EIS/OEIS.	Cumulative Effects
0098	Kimmer "Nahonu" Horsen Bighorse		6	The No Action Alternative is Misrepresented Under § 1502.14, the alternatives section is the heart of the EIS. The No Action Alternative, where the Navy stops military testing and training activities in our waters, is described in the document as resulting in conditions "unchanged or slightly improved from baseline conditions." This is a gross misrepresentation. The No Action	In regard to the No Action Alternative, the Final EIS has been updated and the No Action Alternative does not draw significance conclusions for the resources analyzed so as to not assume outcomes should the leases and easements not continue.	Action Alternatives

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Alternative should be evaluated based on the BENEFITS of stopping harmful military activities, not just the absence of harm. Currently the NAVY is running 7,432 activities per year under this EIS in Hawaii alone, according to tables G-16 and G-17.		
0098	Kimmer "Nahonu" Horsen Bighorse		7	For example: Endangered Species Recovery: If endangered birds, Hawaiian monk seals, humpback whales, and green sea turtles are not subjected to thousands of harmful interactions with the Navy each year, they have a far greater chance of recovery. The Hawaiian monk seal, with only 1,600 individuals remaining, is highly sensitive to disturbances. In a 7 year period, they would avoid 9,228 instances of harm from the NAVY. Humpback whales, which migrate through Hawaiian waters annually, and green sea turtles, which depend on nearshore habitats, are also at risk with thousands of harmful interactions (see below). Stopping military activities would allow these species to thrive. Cultural and Community Benefits: For Kanaka Maoli (Native Hawaiians), the ocean creatures are not just a resource but a relative, as described in the Kumulipo. Constant harm to marine life and intrusions on cultural practices, such as fishing and traditional ceremonies, have profound spiritual and community impacts. Ending military activities would restore the ability of Native Hawaiians to malama ocean relatives and practice cultural traditions. Reef and Ocean Health: Coral reefs, already under immense stress from climate change, would have a chance to recover if not constantly harmed by Navy activities. Healthy reefs support subsistence fishing, wildlife, and the overall health of our oceans, which produce over 50% of the Earth's oxygen and absorb 30% of global CO2 emissions. The No Action Alternative should be re-evaluated to reflect these significant benefits, not dismissed as "unchanged or slightly improved." Mahalo, Kimmer "Nahonu" Horsen Bighorse	As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. In regard to the No Action Alternative, the Final EIS has been updated and the No Action Alternative does not draw significance conclusions for the resources analyzed so as to not assume outcomes should the leases and easements not continue.	Biological Resources
0099	Kimmer "Nahonu" Horsen Bighorse		1	Aloha Navy EIS Officer, My name is Kimmer Bighorse and have been stationed at Schofield Barracks as a light and heavy wheel diesel vehicle mechanic/Soldier at first in 2008. I have since become a macro social worker for her Majesty Queen Liliuokalani of the Hawaiian Kingdom. I volunteered for the US Army Global war on terrorism in March 2002 where I served in many middle east and overseas tours including Germany, Hawaii, Iraq, Qatar, Texas, California and Afghanistan. Since then, I never in my active duty Army career, witnessed the destruction and neglect of the environment as abuse in Hawaii's oceans, skies, space, and land bases by the United States military. Native Hawaiians or Kanaka Maoli of the Hawaiian Kingdom have been monitoring their wahi pana land bases such as Barking Missil Range, Kauai, Kokee Observatory, Pohakuloa since 1957. This is why I recommend getting rid of the missile ranges, SONAR test submarine test sites, field artillery ranges, armor combat units from Hawaii entirely as there is simply not enough room for their equipment, personnel or families. Not only that, the hazardous materials, contamination and pollution from such destruction of field training, ordnance detonation contamination is not disposed of properly. This would never occur in Germany, Iraq, Afghanistan or Kuwait who each have a heavily armed arsenal, military, even terrorist organizations inflicting violence on U.S. military personnel. Germany monitors the United States base environmental impact. Even so, the German Bundeshwehr did not renew their United States military leases, evicted much of the the United States military and downsized US forces.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to the presence of military operations on Hawai'i. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 6.1 (Consistency with Government Plans and Policies) of the Final EIS. The Final EIS also includes a discussion on the Navy's adherence to applicable State and federal regulations regarding the disposal of hazardous or toxic wastes in Section 3.12 (Hazardous Materials and Waste).	
0099	Kimmer "Nahonu"		2	I recommend downsizing the active duty personnel here on all islands to the bare minimum as the United States is belligerently occupying, pillaging and destroying	Thank you for your comment.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
	Horsen Bighorse			Hawaii Pae Aina, its people and environment since 1893. The following are specific examples of the war crimes being committed by the United States military to this day. On June 27, 2025 the Hawaii State Board of Land and Natural Resources voted in opposition to renew all US military leases. On December 6, 2019, a Pearl Harbor Sailor Machinist Mate Auxilliary Fireman Gabriel Antonio Romero shot two department of defense personnel, injured Roger Nakamine and then shot himself. On July 12, 2024, PFC Dewayne Johnson murdered and dismembered his wife's body in a trash dumpster on Schofield Barracks Hawaii. On January 2021 SPC Raul Hernandez Perez struck his wife in the back of the head with a baseball bat, stabbed her in the back then dismembered her body into a trash dumpster on Schofield Barracks Hawaii. Since 2019 Operation Keiki Shield 18 has the Hawaii ICAC Task force has arrested more than 108 individuals perpetrators and child predators, Marines, Soldiers, Sailors, Coast Guard and Air Force alike. 3 arrests were made during Operation Keiki Shield Kauai. Under international law, the United States must enforce the laws of the Occupied State, the Hawaiian Kingdom. As such, Barking Sands needs to be de-occupied, decontaminated of UXOs, depleted uranium and any other ordnance in the land, water and oceans by the United States Navy. The belligerent military occupation and pillaging of such Hawaiian Kingdom lands, oceans, waterways is a an active crime against humanity. On August 8-16, 2023, Lahaina wildfires killled 108 Lahaina citizens and 2 went missing. The damage has been estimated to be 6 billion while FEMA estimated more than 2200 buildings burned. The United States Navy could have deployed their submarines, cruise ships, destroyers, vessels and planes to assist in putting out the fires and saving countless lives and properties. The United States Navy at both Pearl Harbor and Barking Sands Missile range were apathetic and indifferent while an entire city of men, women, children and pets were torched. Hawaii cannot have such neglect, abuse and blatant apathy present on its sacred lands.		
0099	Kimmer "Nahonu" Horsen Bighorse		3	President Bill Clinton confessed, recognized and apologized for the belligerent overthrow of the Hawaiian Kingdom in 1893 but to this day, did nothing to offer remittance or restitution for the war crimes still being committed today. Navy personnel and military personnel contribute to the sex trafficking industry in Hawaii more than any other occupation. Native Hawaiian wahine suffer an exploitation epidemic at the hand of belligerent occupation. Kanaka Maoli, Native Hawaiian Opio suffer the most suicide ideation, attempt and lethal suicide more than any other racial and age demographic in Hawaii. Belligerent military occupation adversely effects the mental, spiritual, physical, and emotional health of all Kanaka Maoli Kingdom subjects: depression, anxiety, loss, homelessness, child abuse, poverty, mental disorders, and mood disorders. Addiction and houselessness are a result of belligerent occupation, the destruction of the environment, the ocean, the wahi pana, sky pollution, destruction of sacred sites, heiau, burial grounds that adversely effect Hawaiian subjects mental health, the Hawaiian Nationals who experience violent United States Navy military occupation daily.	Thank you for your comment.	Socioeconomics
0099	Kimmer "Nahonu" Horsen Bighorse		4	Native Hawaiians are denied access to their sacred sites, oceans, on bases and military reservations, banned from ensuring the United States Navy disposes and decontaminates its live fire and submarine SONAR exercise training debris. Dead whales wash up on shore because of the violent SONAR sounds the submarines make causing the whales, honu and endangered Hawaiian monk seals deaf. I reiterate the United States Navy complies with the endless contamination of our	At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during	Cultural Practices

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				Halawa Shaft on Oahu that hydrates much of Moanalua military personnel, Pearl Harbor and Hickam bases. PFAS has been detected as well as toxic lead at the Army firing range Puuloa in Ewa Beach. Does the Army really need endless inventories of Abrams, Bradley tanks, heavy armor equipment vehicles, Strykers, 5-ton trucks, Howitzers, Patriot missile launchers for land battles like WWII? Even though there are other militaries with nuclear powers building up, strategic war planning, and storing their arsenal the world over, the keiki o ka aina would rather restore their lands, oceans, air and space than further contaminate and pollute their sacred water resources and wahi pana. There are other locations for the United States to stock their heavy armor equipment and munitions other than the already overcrowded, overpopulated Oahu, Big Island, Kauai, Maui, Kahoolawe, Lanai and outlying islands such as Polaniku; desserted locations such as the Mojave Desert in California. I recommend sending EOD expolsive disposal units into clean up the deadly depleted uranium buildup, unexploded ordnance and deoccupy Barking Sands missile range immediately. Allow Hawaiian cultural practitioners, kupuna, Kumu supervise the decontamination. Do NOT accept the Navy's version of an environmental impact statement. E malama pono, Aloha aina, Aloha Wai, Aloha Wakea, Aloha Kanaloa Kimmer (Nahonu) Bighorse Horsen 10 year United States Army Veteran Turtle Clan	updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and 3.5 (Land Use and Access) of the Final EIS, the Proposed Action would not change public access at PMRF for cultural activities. In Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i, Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the HDOH during the remedial investigation process. There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land. Recently, during an infrastructure upgrade project conducted on Barking Sands, it was determined that a full Explosive Safety Submittal was required in that project area, (over 7 miles of area), and several pieces of munitions and explosives of concern were located and disposed. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0099	Kimmer "Nahonu" Horsen Bighorse		5	P.S. I am submitting this testimony on behalf of myself, as well as in solidarity with Native Hawaiians, environmentalists, water protectors, and all who care deeply about the health of our oceans, the protection of marine life, and the preservation of cultural and sacred practices tied to the moana (ocean). I am deeply concerned about the inadequacies and misleading statements in the Draft Environmental Impact	The Navy and NASA respect your concerns related to other NEPA documents. However, the 2025 HCTT Final EIS/OEIS is outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting the parties responsible for the 2025 HCTT Final EIS/OEIS.	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Statement (EIS) and Overseas Environmental Impact Statement (OEIS) for the Hawaii-California Training and Testing (HCTT) activities. Here is an outline of some of the issues in the documents, hereafter called the EIS or OEIS. It is not comprehensive, because despite regulations that the maximum size of an EIS is 300 pages, this document is 4 volumes long with the first volume alone being over 700 pages. It is a blatant violation of the regulation and makes the document unreadable to community members, but here are some highlights.		
0099	Kimmer "Nahonu" Horsen Bighorse		6	The No Action Alternative is Misrepresented Under § 1502.14, the alternatives section is the heart of the EIS. The No Action Alternative, where the Navy stops military testing and training activities in our waters, is described in the document as resulting in conditions "unchanged or slightly improved from baseline conditions." This is a gross misrepresentation. The No Action Alternative should be evaluated based on the BENEFITS of stopping harmful military activities, not just the absence of harm. Currently the NAVY is running 7,432 activities per year under this EIS in Hawaii alone, according to tables G-16 and G-17.	In regard to the No Action Alternative, the Final EIS has been updated and the No Action Alternative does not draw significance conclusions for the resources analyzed so as to not assume outcomes should the leases and easements not continue.	Action Alternatives
0099	Kimmer "Nahonu" Horsen Bighorse		7	For example: Endangered Species Recovery: If endangered birds, Hawaiian monk seals, humpback whales, and green sea turtles are not subjected to thousands of harmful interactions with the Navy each year, they have a far greater chance of recovery. The Hawaiian monk seal, with only 1,600 individuals remaining, is highly sensitive to disturbances. In a 7 year period, they would avoid 9,228 instances of harm from the NAVY. Humpback whales, which migrate through Hawaiian waters annually, and green sea turtles, which depend on nearshore habitats, are also at risk with thousands of harmful interactions (see below). Stopping military activities would allow these species to thrive. Cultural and Community Benefits: For Kanaka Maoli (Native Hawaiians), the ocean creatures are not just a resource but a relative, as described in the Kumulipo. Constant harm to marine life and intrusions on cultural practices, such as fishing and traditional ceremonies, have profound spiritual and community impacts. Ending military activities would restore the ability of Native Hawaiians to malama ocean relatives and practice cultural traditions. Reef and Ocean Health: Coral reefs, already under immense stress from climate change, would have a chance to recover if not constantly harmed by Navy activities. Healthy reefs support subsistence fishing, wildlife, and the overall health of our oceans, which produce over 50% of the Earth's oxygen and absorb 30% of global CO2 emissions. The No Action Alternative should be re-evaluated to reflect these significant benefits, not dismissed as "unchanged or slightly improved." Mahalo, Kimmer "Nahonu" Horsen Bighorse Her Majesty's Queen Liliuokalani's Macro Social Worker	As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. In regard to the No Action Alternative, the Final EIS has been updated and the No Action Alternative does not draw significance conclusions for the resources analyzed so as to not assume outcomes should the leases and easements not continue.	Biological Resources
0100	Roslyn Cummings		1	To: info@pmrf-kpgo-eis.com dhhl.planning@hawaii.gov blnr.testimony@hawaii.gov governor.green@hawaii.gov ag.hawaii@hawaii.gov feedback@ios.doi.gov publicoutreach@state.gov cc: oip@hawaii.gov, bar@hawaii.gov, senator@hirono.senate.gov,senator@schatz.senate.gov To All Agencies and Responsible Parties:	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				I submit this communication not as a public comment, but as a lawful objection, formal notice, and Point of Order under Rule of Law, Treaty Law, and Exclusive Equity Jurisdiction.		
0100	Roslyn Cummings		2	**POINT OF ORDER:** This proceeding — the PMRF-KPGO Radar Enhancements EIS and all associated expansions — is out of order, unlawful, and without proper jurisdiction or consent from the lawful heirs and trustees of the Hawaiian Kingdom and the ʻāina in question. The agencies listed above are knowingly participating in crimes of omission, unlawful enrichment, and ongoing desecration of sacred lands, burial systems, and life-giving aquifers under federal trust law, international law, and the 1826 unratified Treaty and 1849 ratified Treaty between the Hawaiian Kingdom and the United States.	The Navy and NASA comply with all applicable federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS.	Land Use and Access
0100	Roslyn Cummings		3	**NOTICE OF LAWFUL OBJECTION:** I object to: • All proposed expansions at PMRF and NASA, including 22 ground troop invasions, 26 amphibious landings, and Osprey-related aerial assaults on sacred land. Renewal of lease and or purchases of land not belonging to— based on subject matter jurisdiction. No EIS survey will cover for the fraudulent use if Land within the territory of Ko Hawaii Pae Aina known as the Hawaiian Kingdom • Continued desecration of iwi kūpuna, papa reefs, wai (freshwater systems), lava tube cave ecosystems, ʻAina waiwai natural resources, nutrients, and imprints • Use of Kauaʻi for classified missile and hypersonic weapons testing under Sandia Labs and the Department of Energy • Drawdown of sacred water sources and compression of aquifer percolation zones from missile cooling infrastructure • Any attempt to treat this as a procedural "comment" rather than a claim of standing, jurisdiction, and notice of legal violation	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The scope of the Project as defined by the applicants is defined by the area for which the applicants seek real estate agreements with the State of Hawaiʻi Board of Land and Natural Resources. As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. Effects from testing and training activities were analyzed in previous PMRF National Environmental Policy Act (NEPA) documents presented in Table 1-5 of the Final EIS. These documents describe the mitigation measures already in place to reduce adverse effects from these activities. Effects from proposed changes to ongoing activities are analyzed in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA.	Land Use and Access
0100	Roslyn Cummings		4	**WE DO NOT CONSENT.** We are not "stakeholders." We are not "commenters." We are lawful heirs and trustees, serving notice of standing, not opinion. **LEGAL FRAMEWORK:** This notice is issued under: Hawaiian Kingdom Law (1839 Declaration of Rights, 1840 Kanawai, 1848 Māhele, 1850 Kuleana Act) Treaty Law (1826 U.S.–Hawaiʻi Treaty; 1849 Treaty of Friendship, Commerce &Navigation) Trust Law (Hawaiian Homes Commission Act §209, U.S. Admission Act §5(f)) International Law (UNDRIP, Geneva Conventions) Maxims of Law (Fraud vitiates all, Let justice be done though the heavens fall)	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. As stated in Section 1.1 (Project Area), the EIS has been prepared consistent with Hawaiʻi Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawaiʻi Revised Statutes Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: NEPA (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS.	Land Use and Access
0100	Roslyn Cummings		5	**EVIDENCE OF VIOLATIONS:** 1. Crimes of Omission: Failure to disclose harm to aquifers, ecosystems, burials, and native access under NEPA, NHPA, and international law 2. Unjust Enrichment: Profiting from desecrated lands without rightful chain of title, restitution, or consent 3. Fraudulent Jurisdiction: Conducting foreign operations on Hawaiian Kingdom soil under color of law, while the political status remains unresolved 4. Constructive Fraud & Conversion: Taking sacred waters, land, and life systems under false authority 5. Environmental Collapse: Disruption of lava tubes, caves, endemic species, coral, and groundwater through launch activity and infrastructure	The Navy and NASA comply with all applicable federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS. Current real estate agreements are included in the Final EIS in Appendix C.	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	
0100	Roslyn Cummings		6	**RELIEF & REMEDY DEMANDED:** 1. Cease and Desist all military expansion, testing, and lease renewals at PMRF, KTF, and related areas 2. Full Disclosure of underground, coastal, and aerial operations, including classified contracts and missile data 3. Remediation & Repatriation of desecrated ʻāina, wai, and iwi kūpuna 4. Return of Title to Kānaka Maoli under rightful equity and treaty jurisdiction 5. Recognition of Standing of lawful heirs under Equity and Trust Law **SUPPORTING RECORD:** • Bureau of Conveyances Filings • Verified Equity Lawsuits (Fifth Circuit) • Treaties and Constitutional Documents • Ongoing violations documented by SHPD, EA filings, public health reports This notice will be submitted into the public record and will be used in all future legal proceedings, filings to the UN, the ICJ, and public international law forums. We say again: We are not voices echoing in a void. We are the living heirs of this ʻāina — and this ʻāina hears us. We do not consent to our homelands being laboratories of death. We do not consent to our aquifers being weapons testing zones. We do not consent to lies masked as law. He Kūʻē Kēia. This is a stand. This is a lawful objection. Signed: Roslyn; Cummings, Trustee and Lawful Heir Malama:Cummings ʻOhana God Trust© Kalaheo, Hawaiʻi Nei Notice to Agent is Notice to Principal.	The Navy and NASA comply with all applicable federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS.	

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0101	John Wilks	Veterans for Peace	1	RE: Public Comment on the Engineering Systems Command's Draft Environ-mental Impact Statement (DEIS) Regarding the Proposed Renewal of a 30-Year Lease on West Kauai'i for the Continued Use By the Pacific Missile Range Facility (PMRF) and the Koke'e Park Geophysical Observatory (KPGO). Dear Ms. Ling: Our Working Group timely files this comment opposing the renewal of a 30-year lease of more than 8,000 acres on West Kaua'i currently occupied by the Pacific Missile Range Facility (PMRF) and the Koke'e Park Geophysical Observatory (KPGO). We believe the DEIS is defective in that it is incomplete and that no serious consideration of the proposed 30-year lease should continue until the DEIS is amended or withdrawn. We understand that the land subject to the proposed lease is not only sacred land, but also land stolen by the United Stated government in 1893. Native Hawai'ians assert the subject parcel encompasses sovereign lands and waters of the State of Hawai'i. This area has been illegally occupied for more than a century. It must be restored to its pre-occupation condition then returned to the people of Hawai'i.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Your opposition to the Proposed Action is noted. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	General Opposition
0101	John Wilks	Veterans for Peace	2	The lease renewal, subject to the Draft Environmental Impact Statement (DEIS) is the third in a series of similar proposals made by the government within the past 90 days. Recently we opposed the US Army's long-term lease proposal of the Pohakuiloa Training Area, Kahuku Training Area, Kawailoa-Poamoho Training Ares, and the Makua Military Reservation for many of the same reasons we oppose the current lease proposal by the US Navy. Renewal of this lease should be denied for the reasons as follows: 1. The lands may have sacred burial sites, cultural sites, endangered or threatened species habitats, and adverse consequences on critical fresh water sources or ocean ecosystems. 2. The Navy has not shown that it conducted full archaeological and cultural surveys of the lands, as required by the National Environmental Policy Act (NEPA). 3. The DEIS ignores key alternatives (such as shorter lease terms or no military use). 4. The federal government's use may cause environmental damage and further desecration of sacred lands. 5. The Navy has failed to analyze potential affects on climate change impacts or long-	The Navy and NASA respect your concerns related to other proposed military leases. In order to support analysis for the Board of Land and Natural Resources (BLNR) as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Additionally, the potential influence of these trends are discussed in each resource section of the Final EIS. In response to your listed concerns: 1. Sections 3.2 (Archaeological and Architectural Resources) and 3.3 (Cultural Practices) of the Final EIS summarize the Navy and NASA's efforts to identify sacred burial sites and cultural sites. The Archaeological Inventory Survey and Cultural	Archaeological and Architectural Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				term community health. 6. These lands are not subject to lease agreements as they are the commons within the tradition lands of the Native Hawai'ian indigenous peoples.	Impact Assessment (CIA) reports can be found in Appendix F of the Final EIS. Section 3.4 (Biological Resources) of the Final EIS includes ecosystem habitats and a list of endangered or threatened species present or with potential to occur in the Project Area. 2. Archaeological and Architectural surveys were conducted for all portions of the Region of Influence (ROI) where the Proposed Action has potential to affect these kinds of resources. The surveys covered all leaseholds and all easements for utilities and roadways in the ROI. Continued use and routine maintenance activities within these areas have potential to affect archaeological and architectural resources. Per discussions with DLNR, the proposed restrictive use easement lands were not surveyed because those lands are under the jurisdiction of the Agribusiness Development Corporation (ADC), and the proposed easement terms and Navy uses of those lands would not have the potential to affect archaeological and architectural resources. The CIA covers information shared with Navy and NASA about cultural resources and practices in the western portion of the ahupua'a of Waimea in the district of Kona on Kaua'i, extending from Kalalau Valley in the north to Kekaha Town in the south, and roughly from Waimea Canyon in the east and across Mānā Plain to the nearshore waters in the west. This is consistent with the 1997 CIA Guidelines. 3. The screening process for choosing alternatives that meet the Navy's and NASA's purpose and need are described in Section 2.2 (Alternative Screening Process) of the Final EIS. Alternatives considered but not carried forward due to not fulfilling the purpose and need are described in Section 2.4 (Alternatives Considered but Not Carried Forward for Detailed Analysis) of the Final EIS. 4. Effects from the Proposed Action are disclosed in each resource section of the Final EIS. 5. In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. 6. At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	
0101	John Wilks	Veterans for Peace	3	We strongly advocate for clean-up and restoration of both sites and removal of all traces of government colonization of Hawai'ian lands and waters since annexation in 1898 and, subject to the current lease, should commence as soon as possible, but not later than the expiration of the current lease periods. The justification by the military for the state to lease militarized areas is specious. The US government is provoking and planning a general military conflict with China. To that end, it considers the training, administrative, and scientific study areas in Hawaii'i essential for the training of its own forces and those of its foreign vassals. Hawai'i is considered a forward base in the Indo-Pacific Region in the military's march toward China.	Thank you for your comments.	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Our Working Group understands, as in New Mexico, members of your Congressional delegation, the state Governor, and many members of your state legislature may support the US Government's outrageous proposal. Under the banner of national patriotism, retention of jobs, economic benefits, and traditional accommodation of the military, officials may believe it is in State's best interest to lease the areas for another 30 years. We adamantly disagree. We urge the US Navy to withdraw the proposed lease agreement or abandon the subject sites, or amend the DEIS. Respectfully submitted, John E. Wilks, III Co-Chair Veterans Fo Peace Working Group (Uranium Weapons) President, Chapter #63 (Albuquerque) johnewilksiii@windstream.net (575) 743-0477		
0102	Scott Whitmarsh		1	Aloha Kākou This is my testimony and I am demanding no new leases, accountability for environmental and cultural harm, comprehensive cleanup and restoration, and return of ʻāina to Kānaka Maoli. Mahalo! Scott	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to biological and cultural resources. These resources are described in Sections 3.2 (Archaeological and Architectural Resources) through 3.4 (Biological Resources) of the Final EIS.	General Opposition
0103	Erin Rutherford		1	Hello, I am writing in opposition to the proposed 30 year leases on Kauai for the following reasons. We should not be using native, sacred land for these purposes. This land was stolen and should be returned to the native community. -Accountability for environmental and cultural harm -we need comprehensive cleanup and restoration -we should return the ʻāina to Kanaka Maoli	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to biological and cultural resources. These resources are described in Sections 3.4 (Biological Resources) through 3.3 (Cultural Practices) of the Final EIS.	Land Use and Access
0104	Nākaiʻelua Villatora		1	[Notice to Agent is Notice to Principal, Notice to Principal is Notice to Agent] Notice Attached is for the Record to be recorded at Public Notice, Point of Order & Lawful Objection from Nākaiʻelua Villatora hoʻoilina kū i ke kanawai ʻo Ko Pae ʻĀina Hawaiʻi in Good Faith, Without Prejudice, and Without Unlawful Recourse. Me ka ʻoiaʻiʻo a me ka akaaka.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Please see responses to your specific comments below.	EIS Process
0104	Nākaiʻelua Villatora		2	**<u>Point of Order & Lawful Objection</u>** **[Notice to Agent is Notice to Principal, Notice to Principal is Notice to Agent]** Agenda Item: PMRF- KPGO EIS To All Agencies and Responsible Parties: I, Nākaiʻelua Villatora hoʻoilina kū i ke kanawai submit this notification not as a "public comment" but as a Lawful Objection, Formal Notice, and Point of Order under Rule of Law, Treaty Law, and Nā Kumu Kanawai o Ko Pae ʻAina Hawaiʻi. POINT OF ORDER: The PMRF-KPGO Radar Enhancements EIS and all associated expansions are out of Order, Unlawful, and without Proper Jurisdiction or Consent from hoʻoilina kū i ke kanawai (Lawful Heir) of Ke ʻAupuni Hawaiʻi (Hawaiian Kingdom) Ko Pae ʻAina Hawaiʻi and ʻāina in question. All responsible agencies are knowingly participating in crimes of omission, unlawful enrichment, and ongoing desecration of ʻāina kapu, pā ʻilina, kumu waiwai hawaiʻi, pūnāwai that are protected under federal trust law, international law and the 1836	The Navy and NASA respect your concerns regarding the historic use of this land. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				unratified Treaty and 1849 ratified Treaty between Ke ʻAupuni Hawaiʻi Ko Pae ʻAina Hawaiʻi and the United States of America.		
0104	Nākaiʻelua Villatora		3	NOTICE OF LAWFUL OBJECTION: I, Nākaiʻelua Villatora hoʻoilina kū i ke Kanawai Hawaiʻi Objection to: • All proposal expansions at PMRF and NASA. • Renewal of lease and/or unlawful "purchases" of ʻāina not belonging to the United States of America and is still held in trust under the Great Māhele rightfully belonging within Ko Pae ʻAina Hawaiʻi. • Continuous desecration of iwi kūpuna, papapa, wai, ana pele, ʻaina kumu waiwai, etc. • Any attempt to use this as a procedural "comment" rather than a Claim of Standing and Jurisdiction. I DO NOT CONSENT I am are not "stakeholders" I am are not "commenters" I am hoʻoilina kū i ke kanawai and trustees, serving Notice of Standing, not opinions.	1) As described in Project Introduction and Overview (Section 1.1) of the Final EIS, the current and proposed use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training and continued operations including measurements of the Earth's rotation and local land motion at KPGO. The Proposed Action does not include any expansion to leasehold or easement lands. 2) At this time, the land is under State jurisdiction by the DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the Project Area is described in Land Use and Access (Section 3.5) of the Final EIS. 3) Discussion of Cultural Practices (Section 3.3.1.5, Existing Conditions) of the Final EIS, including the veneration of iwi kūpuna and ancestors. 4) The EIS has been prepared consistent with the current federal and State legal framework.	Land Use and Access
0104	Nākaiʻelua Villatora		4	LEGAL FRAMEWORK: • Hawaiian Kingdom Law (1839 Declaration of Rights, 1840 Kumu Kanawai, 1848 Great Māhele, 1850 Kuleana Act) • Treaty Law (1826 Hawaiʻi Treaty with U.S.; 1849 Treaty of Friendship, Commerce & Navigation) • Trust Law (Hawaiian Homes Commission Act, U.S. Admission Act) • International Law (UNDRIP, Geneva Conventions) • Maxims of Law (An Act of God does wrong to no one, cause no injury; Where truth is, fiction of law does not exist)	The EIS has been prepared consistent with the current federal and State legal framework. The Navy and NASA comply with all applicable federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS.	Land Use and Access
0104	Nākaiʻelua Villatora		5	REMEDY DEMANDED: I, Nākaiʻelua Villatora demand remedy of cease of all military expansion, testing and lease renewal at PMRF, KTF, and all associated areas. Full disclosure of all operations including classified. Remediation of ʻaina and wai. Repatriation of desecrated iwi kupuna. Return of Lawful Title to Kanaka Maoli and hoʻoilina kū i ke kanawai. Recognition of Standing of hoʻoilina kū i ke kanawai. THIS WILL BE SUBMITTED AS A PUBLIC NOTICE ON RECORD FOR ANY FUTURE STANDING. Ke Kū Kanawai No Laila *The Law still Stands* Ma lalo o ka malu o IO a palekana i ka ʻoiaʻiʻo a me ke kanawai *Under the protection of IO a safeguard of the truth and law* Nākaiʻelua Villatora, hoʻoilina kū i ke kanawai Hawaiʻi Kalaheo, Kauaʻi, Ko Pae ʻAina Hawaiʻi	Your opposition to the Proposed Project is noted. It is outside the scope and jurisdiction of this EIS to provide full disclosure of all operations at PMRF, to include classified operations. A discussion on activities conducted on leasehold and easement lands, including for Biological and Water Resources, is discussed in detail in Section 3 (Affected Environment and Environmental Consequences) of the Final EIS. Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the Project Area is described in Section 3.5 (Land Use and Access) of the Final EIS.	Land Use and Access
0105	Shyanne Olores		1	I, Shyanne Olores, a Kanaka Maoli and descendant of Mana, Nohili, and the Hawaiian Kingdom, submit this testimony as a formal Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth. I object to the lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi. This testimony is submitted on the record in defense of the land, people, and rightful sovereign status of Hawaiʻi. As a descendant of Mana, my lineage, rights, and responsibilities to this ʻāina are protected by both natural law and international law. My grandparents were the last of our ʻohana to reside in Mana town. I was raised in Nohili, fishing and gathering, visiting the dunes where my ancestors — our iwi kupuna — are buried. My father and	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciates the information you provided about your family lineage. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				his brothers hunted in the Mana tunnels to feed our family. These lands are not abstract to me — they are my genealogy, my truth, my kuleana. This land — and all lands under PMRF — remain the territory of the Hawaiian Kingdom. I give Notice of Fact: The illegal overthrow of the Hawaiian Kingdom in 1893 was acknowledged by the U.S. government in the 1993 Apology Resolution. No treaty of annexation was ever ratified. Therefore, the United States has no legal claim to the lands it currently occupies at PMRF. I declare that the presence of the U.S. military on Hawaiian Kingdom lands constitutes ongoing illegal occupation. There is no lawful lease to renew. You cannot lease what was stolen. This land was never ceded. Kanaka Maoli have never relinquished our claims. The United States has no jurisdiction here. Over the past seven years, seven members of my ‘ohana from Mana and Kekaha have died from cancer. Each of them worked in agriculture on the west side of Kaua‘i. These are not isolated incidents. They are the result of environmental violence committed by the U.S. military. PFAS — forever chemicals — were identified in PMRF soil and groundwater as far back as the 1960s. And yet, no clean up has occurred. The Navy's promise of 'remediation forthcoming' is not a solution — it is a continuation of harm. I object to the poisoning of our land and people under the guise of national security.	The Navy and NASA respect your concern regarding concern over cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. In Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai‘i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	
0105	Shyanne Olores		2	I further give Notice of Fact that the Draft Environmental Impact Statement fails to account for cumulative impacts — including those of RIMPAC, live-fire drills, missile tests, and global weapons transfers that are directly linked to U.S. military activity at PMRF. The DEIS ignores environmental, cultural, and international legal consequences. This is not oversight — it is systemic erasure. As a Kanaka Maoli with ancestral ties to this land, I reject all options within this DEIS. I do not consent to continued occupation, expansion, or mitigation. I invoke my inherent rights to land, culture, and life. Therefore, I declare the following lawful demands: 1. The immediate termination of all military leases and operations on Hawaiian Kingdom land at PMRF. 2. Full cleanup of PFAS, fuel, and hazardous waste contamination. 3. Restoration of sacred sites, including the dunes at Nohili. 4. Full return of all lands under PMRF to the rightful stewards — the Kanaka Maoli. The U.S. military's continued presence on these lands, without consent, constitutes an act of aggression. It violates the principles of international law, natural law, and the rights of Indigenous peoples as outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). This is not America. This is the Hawaiian Kingdom. These are our lands. I stand in lawful objection, and I do so with the authority of my kūpuna behind me. I will not be silent while our people die and our lands are desecrated. He Hawai‘i au. I do not stand alone. Submitted in truth, honor, and defense of the ‘āina, Shyanne Olores 8/7/25, 12:49 PM Professional Email Point of Order Printout	The Rim of the Pacific (RIMPAC) exercise, live-fire drills, missile tests, and global weapons transfers are outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. 1) Your opposition to the Proposed Action has been noted. 2) Please see response to comment #1 for more information on the ongoing PFAS investigation and upcoming remedial investigation. There are no tanks with active fuel leaks at PMRF. As discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS, all hazardous waste produced on leasehold and easement lands is handled, managed, and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. 3) Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating	Public Health and Safety

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. 4) Your opposition to the Proposed Action is noted. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	
0106	Paulette Morrissey		1	I am writing to express my strong opposition to the proposed 30-year leases for over 8,000 acres of Hawaiian lands on Kaua'i for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory. The Draft Environmental Impact Statement (EIS) you've provided is wholly insufficient and fails to assess the full scope of harm these projects inflict. It completely ignores significant impacts on our land, water, ocean ecosystems, endangered species, and sacred sites. Furthermore, there is no meaningful analysis of climate change or acknowledgment of the ongoing desecration, militarization, and environmental racism these projects perpetuate. We cannot and will not accept an incomplete assessment that disregards the well-being of our environment and the health of our Peoples. The continued occupation and use of these lands without proper accountability is unacceptable.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to biological and cultural resources. These resources are described in Sections 3.2 (Archaeological and Architectural Resources) through 3.4 (Biological Resources) of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	Biological Resources
0106	Paulette Morrissey		2	Therefore, I demand that you withdraw your applications for these new leases. We also require a commitment to a full cleanup and restoration of the lands already impacted and the immediate return of 'āina to Kānaka Maoli. Sincerely, Paulette Morrissey	The Navy and NASA note your opposition to the Proposed Action. As stated in Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS, pursuant to the terms of the current real estate agreements, at the expiration of the leases and easements, any return of State property would involve complex negotiations and collaboration with the State to determine the condition of the returned lands.	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				"There is no sadder sight than young pessimist" ~Mark Twain~		
0107	Tia Marie		1	To whom it may concern in this Draft EIS process, please respond acknowledging you have received this email and it's attachment on behalf of Hawai'i Peace & Justice. *E iho ana 'o luna* *E p'i ana 'o lalo* *E hui ana nā moku* *E kū ana ka paia* *That which is above shall be brought down* *That which is below shall be lifted up* *The islands shall be united* *The walls shall stand upright* Mahalo, Tia Marie Namahana Masaniai-Estrera Lead Youth Organizer Hawai'i Peace & Justice	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA have received your comment and its attachment, and provided an email to you on August 7, 2025, confirming receipt.	General Opposition
0107	Tia Marie		2	**Hawai'i Peace and Justice** **Draft Environmental Impact Statement (DEIS) Written Testimony for the U.S. Navy and NASA Land Retention at PMRF and KPGO, Kaua'i** **Submitted: August 7, 2025** To: Kerry Ling PMRF and KPGO REIS Project Manager NAVFAC Hawai'i 400 Marshall Road, Building X-11 Pearl Harbor, HI 96860 Sheri Miller NASA Goddard Space Flight Center 34200 Fulton Street Wallops Island, VA 23337 **Subject:** **Formal Written Testimony on the Draft Environmental Impact Statement (DEIS) for Proposed U.S. Navy and NASA Land Retention at PMRF and KPGO, Kaua'i** **Introduction** We submit this testimony to document specific legal, cultural, environmental, and procedural deficiencies within the Draft Environmental Impact Statement (DEIS) submitted by the U.S. Navy and NASA on June 20, 2025, regarding proposed long-term retention of lands at the Pacific Missile Range Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO) on Kaua'i. These lands are not merely administrative parcels—they are **Crown and Government Lands of the Hawaiian Kingdom,** held under public trust. They were never lawfully ceded by treaty and carry sacred, ecological, and cultural significance. As such, the DEIS cannot be allowed to move forward without addressing the critical gaps identified herein. Our intent is not to offer simple opposition, but to **raise precise, lawful, and necessary questions** that this DEIS has failed to answer, and which must be resolved before any project advancement can be responsibly considered.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. Due to page limit constraints, a more nuanced and detailed discussion of the Newlands Resolution and the Ku'e Petition is not possible in the Final EIS. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1 and the rules implementing Hawai'i Revised Statutes Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1 and in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS.	Land Use and Access
0107	Tia Marie		3	**1. What Assessments Have Been Conducted on Environmental Hazards?** • What monitoring has been done for **PFAS contamination**, especially following the known C-130 aircraft fi re? • What testing has been performed for **perchlorate**, a known missile propellant contaminant? • Where is the testing data related to **underground fuel tanks** storing JP-8, benzene, and other solvents? If these studies have not been completed, how can the DEIS claim to account for cumulative and long-term impacts under **NEPA and HRS §343**?	Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act), a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency (EPA) screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. Section 3.12.1.4.1 (Hazardous Materials and Waste, Main Base) of Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. The Final EIS discloses information on perchlorate testing at PMRF in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well). Although propulsion testing is outside the scope of this EIS, the Navy and NASA have provided a link below to a publicly available paper published by the EPA, which found that perchlorate does not accumulate in soil or water, and that there were no significant differences in perchlorate concentrations in soil samples at testing ranges before or after firing missiles. This information can also be found in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) in Section 3.2 of that document. An online, pdf version of the paper published by the EPA can be found online at https://semspub.epa.gov/work/HQ/159615.pdf As discussed in Public Health and Safety (Section 3.9.1.4.4, Mākaha Ridge) of the Final EIS, a survey was conducted in 2020 to perform safety inspections on the hazards of electromagnetic radiation to personnel from radar operations. PMRF was granted a certification of compliance, and the survey found that PMRF was routinely implementing appropriate hazardous control measures. Due to these safety measures, the public is not exposed to any hazardous radiation. Effects from aerial and underwater testing are not included in the Proposed Action analyzed by this EIS. As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. Effects from testing and training activities were analyzed in previous PMRF NEPA documents presented in Table 1-5 of the Final EIS. These documents describe the mitigation measures already in place to reduce adverse effects from these activities. Effects from proposed changes to ongoing activities are analyzed in the 2025 HCTT Final EIS/OEIS and the 2025 PMRF Land-Based Training and Testing Final EA. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. As discussed in more detail in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS, per DOH regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all underground storage tanks. Please see the Final EIS for more information.	

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0107	Tia Marie		4	**2. What Climate Risk Modeling Has Been Applied?** • Why does the DEIS not incorporate projections from the **Hawai'i Climate Commission**? • What sea level rise or storm surge data has been used to assess risk to PMRF infrastructure located on coastal sands? • What contingency or adaptation strategies are proposed for climate threats through 2100? Without these disclosures, the environmental impact assessment is materially incomplete.	In order to support analysis for the Board of Land and Natural Resources (BLNR) as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Additionally, the potential influence of these trends are discussed in each resource section of the Final EIS.	Water Resources
0107	Tia Marie		5	**3. Where Is the Cultural Integrity in This Process?** The DEIS fails to meet the **Ka Pa'akai** framework and misrepresents Hawaiian culture as static "archaeological resources." Questions that must be addressed: • Have ethnographic interviews been conducted with lineal descendants regarding **leina a ka 'uhane** and **iwi kūpuna**? • How will surveillance, noise, and explosive testing affect **subsistence, ceremonial, and spiritual practices** tied to this land? • Have the spiritual dimensions of the muliwai ecosystem been included in the cultural impact analysis? Without pa'akai analysis, the DEIS cannot meet state-level review standards.	Section 3.3 (Cultural Practices) of the Final EIS provides a focused summary of the findings of the Cultural Impact Assessment (CIA). Appendix F contains the complete CIA, which uses the results of cultural consultation and archival research to address the topics listed in this comment. The topics raised in your comment are addressed in the CIA and, where appropriate to the Proposed Action, carried over into the EIS. Preparation of the CIA involved interviews with living cultural practitioners who discussed their current practices. The CIA interviews were designed to specifically address the required elements of the Ka Pa'akai O Ka 'Āina analysis and includes a section that presents its findings according to the framework.	Cultural Practices
0107	Tia Marie		6	**4. What Data Supports Public Access Claims?** • What protocols ensure cultural practitioners are not surveilled or denied access? • What legal mechanism ensures that "general access" is not arbitrarily revoked during test periods? If no such protections exist, public access cannot be meaningfully claimed.	At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. PMRF recognizes that even with the current Morale, Welfare and Recreation pass system in place, restrictions on access for cultural practices are an adverse impact (Section 3.3.2.2.3 Cultural Practices/Effect Summary) in the Final EIS. To lessen that impact, PMRF will create a process to streamline access for traditional Hawaiian cultural practitioners through the development of a PMRF Access Management Plan (see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS). Details of the plan would be developed after the decision on the leases and easements are made by the BLNR. Access to DoD installations and other related facilities are controlled under DoD Manual 5200.08, Volume 3 Physical Security Program: *Access to DoD Installations.* Limited access to DoD installations ensures operational security is safeguarded. These circumstances on PMRF are related to Force Protection Condition status, scheduled range operations, and the protection of natural resources Section 3.5.1 (Land Use and Access/Affected Environment) of the Final EIS.	Land Use and Access
0107	Tia Marie		7	**5. What Are the Real Economic Impacts?** • Has the Navy assessed how military use of these lands affects **cost of living, food security, and land access** on Kaua'i? • What is the economic value of alternative land uses—such as regenerative agriculture or clean energy—that are foreclosed by long-term military retention? Framing this proposal as the only viable economic path disregards opportunity costs and manipulates the narrative.	The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include existing Navy and NASA infrastructure and operation in the Region of Influence (ROI) for socioeconomics. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. The Project is described in Sections 2.1 (Proposed Action) and 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS, which includes new real estate agreements and does not include changes the cost of living, food security, or land access in Kaua'i County. Potential	Socioeconomics

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					socioeconomics effects from the No Action Alternative are discussed in Section 3.6.2.4 (Socioeconomics/No Action Alternative) of the Final EIS.	
0107	Tia Marie		8	**6. Why Is Alternative #2 (Military Retention with Modifications) Being Considered for Trust Lands?** Alternative #2 proposes the continuation of military use with expanded operations. However: • **These lands are held in trust** under the Hawai'i State Constitution and Admission Act §5(f) • **Native Hawaiians are legal beneficiaries** of this trust • The State is a **trustee**, not an owner with unrestricted leasing rights Key questions: • Has the State evaluated whether Alternative #2 constitutes a breach of fiduciary duty to beneficiaries? • Has the Navy assessed whether this alternative violates the core purpose of the land as outlined in trust law? These are not administrative technicalities—they are legal obligations that cannot be waived.	The Final EIS includes a description of the State's responsibilities regarding the public land trust in Section 3.5.1 (Land Use and Access/Affected Environment). If Alternative 2 is chosen, any action the State of Hawai'i takes would be lawful and the Navy and NASA would ensure through negotiations with the State that the terms of the sale are consistent with the trust responsibilities. The Navy and NASA are presenting Enhanced Engagements under the action alternatives that propose additional property management protections for the 'āina. Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Action Alternatives
0107	Tia Marie		9	**7. How Do Weapons Tested at PMRF Contribute to Global Harm?** • What safeguards are in place to ensure that missile and drone systems tested at PMRF are not used in human rights violations overseas? • Given documentation by **Amnesty International** and **Human Rights Watch** of U.S. weapons being used in Gaza, Yemen, and Iraq, what ethical review is applied to PMRF-linked programs? • How are contracts with companies like Lockheed Martin and Raytheon being assessed for international law compliance? If the DEIS fails to examine these consequences, it overlooks the global cost of local militarization.	The Navy and NASA recognize your concerns related to military activities. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. Military activities that occur overseas are outside the scope of this EIS.	Ongoing Activities
0107	Tia Marie		10	**Recommendations** We request the following actions: 1. That the **State and Federal agencies not proceed** any further with this EIS process until all data gaps, legal questions, and cultural deficiencies are remedied 2. That a full **Environmental and Cultural Impact Statement (ECIS)** be initiated under state law with inclusive community participation 3. That trust land status and fiduciary obligations be **legally reviewed in light of Alternative #2** 4. That **PFAS, perchlorate, and aquifer health** be independently tested and publicly disclosed 5. That all cultural sites be mapped, protected, and guaranteed **non-conditional** access under enforceable policy	1) Your comment has been noted. The EIS has been prepared consistent with the U.S. and State of Hawai'i's environmental regulatory framework. 2) Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the CIA report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS. 3) Section 3.5.1.2 (Land Use and Access/Regulatory Setting) and 3.5.1.4 (Land Use and Access/History of Land Tenure in the ROI) of the Final EIS discuss the public land trust, including the State and Office of Hawaiian Affairs duties. The enforcement of the State's fiduciary obligations is beyond the scope of this EIS. 4) Please see response to comment #3 for more information on the ongoing PFAS investigation and upcoming remedial investigation and information on perchlorate testing. As discussed in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) of the Final EIS, groundwater from the Kekaha Aquifer is pumped at the Mānā Well, and daily water quality monitoring is performed at five established test stations throughout the water distribution system to test for sudden or gradual changes in water parameters. Additionally, monthly samples are taken for testing by DOH for total coliform contamination and sent to a DOH lab for analysis. The DoD has exceeded current EPA guidance and proactively implemented policies to monitor	Cultural Practices

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					drinking water for PFAS at all service owned and operated water systems at a minimum of every two years. Per the 2024 Mānā Well Consumer Confidence Water Quality Report, over 70 regulated contaminants that have the potential to be in drinking water were tested in 2023, and in all cases, the levels measured were well within requirements for safe drinking water, and all drinking water testing results were below the method reporting limit for all PFAS compounds. The Navy repeated drinking water testing in 2024 and 2025 (except PFAS testing, as compliance monitoring is not required until 2027 per the EPA) and like previous results, all levels measured were within both EPA and State requirements for safe drinking water. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents. 5) Archaeological and Architectural surveys were conducted for all portions of the ROI where the Proposed Action has potential to affect these kinds of resources. The surveys covered all leaseholds and all easements for utilities and roadways in the ROI, and results are summarized in Section 3.2 (Archaeological and Architectural Resources) of the Final EIS and Appendix F (Cultural Resource Investigations). At PMRF, coordination of access for cultural practices is guided by the PMRF ICRMP SOP #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. PMRF recognizes that even with the current Morale, Welfare, and Recreation (MWR) pass system in place, restrictions on access for cultural practices are an adverse impact (Section 3.3.2.2.3 [Cultural Practices/Effect Summary] in the Final EIS). To lessen that impact even more, PMRF will create a process to streamline access for traditional Hawaiian cultural practitioners through the development of a PMRF Access Management Plan (see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS). Details of the plan would be developed after the decision on the leases and easements are made by the BLNR.	
0107	Tia Marie		11	**Conclusion** This written testimony is submitted to identify substantial procedural, legal, and ethical deficiencies in the DEIS. We implore decision-makers to honor their kuleana—not only to current regulatory frameworks, but to future generations, the ʻāina itself, and the law of the land as rooted in trust, treaty, and pono. **He aliʻi ka ʻāina, he kauwā ke kanaka.** **With unwavering clarity and responsibility, Hawaiʻi Peace and Justice**	Thank you for your comment.	EIS Process
0108	Allison Togloka	County of Kauaʻi, Department of Public Works	1	Aloha~ Attached are our comments for the draft EIS for PMRF. Please review and let us know if you should have any questions. Mahalo! Alison Togioka Department of Public Works 4444 Rice Street, Suite 275 Līhuʻe Hawaiʻi 96766 Phone: (808)241-4996 Email: atogioka@kauai.gov Subject: Request for Chapter 343, Hawai'i Revised Statutes Consultation U.S. Navy	The Navy and NASA acknowledges that your attachments have been received.	EIS Process

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				and NASA Draft Environmental Impact Statement for Continued Use of State Lands Navy Pacific Missile Range Facility and NASA Koke'e Park Geophysical Observatory		
0108	Allison Togloka	County of Kauaʻi, Department of Public Works	2	To Whom It May Concern: We have reviewed the subject request and draft Environmental Impact Statement via the project's website at www.PMRF-KPGO-EIS.com. We offer the following comments: 1. The applicant shall comply with all provisions of the "Sediment and Erosion Control Ordinance No. 808" to safeguard public health, safety, and welfare, to protect property, and to control soil erosion and sedimentation. Please note that per Kaua'i County Code 22-7.6(a), the permit requirements of Ordinance No. 808 may be exempted for "work in a public street, sidewalk, alley, right-of-way, or in an isolated, self-contained government controlled area".	The project will comply with all provisions of the "Sediment and Erosion Control Ordinance No. 808" per Kauaʻi County Code 22-7.6(a), the permit requirements of Ordinance No. 808 may be exempted for "work in a public street, sidewalk, alley, right-of-way, or in an isolated, self-contained government controlled area." As discussed in Water Resources (Section 3.7.1.4.2.4/Mākaha and Miloliʻi Ridges), the Navy implements critical erosion control management strategies at Mākaha Ridge to minimize soil erosion. These management actions, such as native vegetation restoration of 6 acres of upland habitat on bare land at Mākaha Ridge (completed February 2026), will help decrease erosion, reduce sedimentation, and increase water quality in the streams and nearshore environment immediately downslope of the facility. The Navy is also implementing methods to conserve natural resources, such as installation and utilization of water catchment basins on structures on the leasehold lands at Mākaha Ridge to capture stormwater for irrigation and other non-potable uses. These catchment basins also help decrease erosion at the site by rerouting flow from impervious surfaces to a central catchment location.	Public Health and Safety
0108	Allison Togloka	County of Kauaʻi, Department of Public Works	3	2. During construction, best management practices (BMPs) shall be incorporated to maximum extent practicable to prevent damage by sedimentation, erosion, or dust the watercourses, natural areas, and other properties. The permittee and the property to owner shall be responsible for ensuring that BMPs are satisfactorily implemented at all times.	The Proposed Action does not include any change in activities or construction. Any future proposed construction would be subject to new environmental analysis and permitting requirements. The Navy would utilize all necessary best management practices in the event of any future construction. A list of best management practices (BMPs) and standard operating procedures regarding surface water quality management can be found in Table 3.7-2 in the Final EIS.	Public Health and Safety
0108	Allison Togloka	County of Kauaʻi, Department of Public Works	4	3. We support and value PMRF and NASA's presence on Kaua'i. Thank you for your continued service to our community. Should you have any questions, please contact our Regulatory and Construction Compliance Section Head, Bryan Wienand, at (808) 241-4896 or bwienand@kauai.gov. Sincerely, Michael Moule, Chief, Engineering P.E. Division BW	The Navy and NASA thank you for your support of PMRF and KPGO.	General Support
0109	Luke Sarvis	DLNR	1	Aloha, Please find attached the Department of Land and Natural Resources' comments on the U.S. Navy Pacific Missile Range Facility and NASA Kōkeʻe Park Geographical Observatory Real Estate Draft Environmental Impact Statement Located in Kekaha and Kōkeʻe on the Island of Kauaʻi Tax Map Key(s): (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1- 2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4)1-2- 002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.) Mahalo, Luke Sarvis Office of the Chairperson Department of Land and Natural Resources 1151 Punchbowl Street, Room 131 (808)291-5047	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process.	EIS Process
0109	Luke Sarvis	DLNR	2	Ms. Kerry Ling NEPA Project Manager 400 Marshall Road Building X-11 Pearl Harbor, HI 96860 Via Email: info@PMRF-KPGO-EIS.com	The Navy and NASA appreciate your thorough review of the Draft EIS and has prepared the following responses to specific division comments below. The team appreciates the summary of comments by Department of Land and Natural Resources (DLNR)-Land Division, and has addressed detailed division comments below. Both the Navy and NASA teams look forward to their continued partnership with all divisions within the DLNR.	EIS Process

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				Subject: Comments on the U.S. Navy Pacific Missile Range Facility and NASA Kōkeʻe Park Geographical Observatory Real Estate Draft Environmental Impact Statement Located in Kekaha and Kōkeʻe on the Island of Kauaʻi Tax Map Key(s): (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1- 2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2- 002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.) Aloha Ms. Ling, On behalf of the Department of Land and Natural Resources (DLNR), I am submitting our consolidated comments on the U.S. Navy Pacific Missile Range Facility (PMRF) and NASA Kōkeʻe Park Geographical Observatory (KPGO) Real Estate Draft Environmental Impact Statement (DEIS). DLNR's divisions have thoroughly reviewed the DEIS and offer the following substantive concerns and recommendations to ensure a comprehensive assessment of the proposed retention areas. Detailed comments from each division are attached for your reference.	In addition to asking specific comments about the Proposed Action and EIS effects analysis, DLNR comment letter requests information about many aspects of the Navy's ongoing activities at PMRF that are beyond the scope of the EIS. The responses below provide as much information relevant to this analysis in the Final EIS. However, as identified in specific responses below, there are some requests from DLNR that are outside the scope of this EIS. As working partners with the Navy, the Navy and NASA encourage DLNR to coordinate with PMRF staff and Navy leadership for any information that is outside the scope of this analysis, but critical to DLNR in their duties to oversee the lands held in lease.	
0109	Luke Sarvis	DLNR	3	**1. Land Division (LD):** LD is concerned that the DEIS does not meet the requirements of Chapter 11-200.1, Hawaii Administrative Rules (HAR). The revisions necessary to meet these requirements will likely trigger republication to allow for further agency and public review and comment. LD's primary concerns include the discrepancy between the described scope and the actual extent of the proposed action, the biological studies lack of sufficient detail to assess the potential impacts on special-status species, and the archeological inventory survey (AIS) lack of proposed mitigation strategies to comply with Section 6E-8, Hawaii Revised Statutes (HRS). In addition, LD provides extensive comments addressing specific concerns throughout the document.	The Navy and NASA appreciate this summary of comments from DLNR-Land Division which have been identified as comments #11 through #43 below. Please see specific responses to DLNR-Land Division's comments in responses to comments #11 through #43 below.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR	4	**2. Commission on Water Resource Management (CWRM):** CWRM notes concerns regarding military use of State lands and the associated risk of groundwater degradation, which could reduce the broader availability of potable water.	The Navy and NASA appreciate this summary of comments from DLNR-Commission on Water Resource Management (CWRM) which have been identified as comments #44 and #45 below. Please see specific responses to CWRM's comments in responses to comments #44 and #45 below.	Water Resources
0109	Luke Sarvis	DLNR	5	**3. Division of Aquatic Resources (DAR):** DAR remains concerned for protected species such as the Hawaiian monk seal and green sea turtle that frequent the beach adjacent to the base as well as the potential for storm water runoff. DAR acknowledges that best management practices currently followed by PMRF personnel are sufficient to prevent take of these protected species and encourages their continued application. DAR also expresses concerns regarding the Navy's ongoing and proposed offshore activities and the related analysis contained in the Navy's 2024 Draft Environmental Assessment covering PMRF's land-based training and testing activities.	The Navy and NASA appreciate this summary of comments from DLNR-Division of Aquatic Resources (DAR) which have been identified as comments #46 through #52 below. Please see specific responses to DLNR-DAR's comments in responses to comments #46 through #52 below.	Biological Resources
0109	Luke Sarvis	DLNR	6	**4. Division of Forestry and Wildlife (DOFAW):** DOFAW questions whether the DEIS fulfills the intent of Chapter 343, HRS, to thoroughly identify and describe all potential environmental impacts. Of the alternatives proposed, DOFAW prefers Alternative 1 and the No Action Alternative and does not support Alternative 2. DOFAW urges the Navy to assist in providing public recreational and hunting access and continue its ungulate control measures. DOFAW recommends that the Final EIS (FEIS) more thoroughly address topics such as wildland fire risk, invasive species control, and management of native plant and animal populations, including terrestrial invertebrates and pollinators. Furthermore, the FEIS should contain a more robust analysis of the impact standard, authorized take, and minimization and mitigation actions for federally listed plants and animals to assist DOFAW in its evaluation of local and cumulative environmental impacts on each listed species and its habitats.	The Navy and NASA appreciate this summary of comments from DLNR-Division of Forestry and Wildlife (DOFAW) which have been identified as comments #53 through #73 below. Please see specific responses to DLNR-DOFAW's comments in responses to comments #53 through #73 below.	Biological Resources

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0109	Luke Sarvis	DLNR, OCCL	7	**5. Office of Conservation and Coastal Lands (OCCL):** OCCL questions the accuracy of the DEIS regarding the permitting history of PMRF and KPGO as several statements in the DEIS contradict OCCL's permit records regarding facilities, utilities, and land uses on State leased land and easements within the Conservation District. OCCL asks for clarification regarding the DEIS' contradictory language regarding the Navy's stated use of broad ocean areas and its decision not to analyze the ocean right-of-way it currently holds and has indicated it intends to continue to use beyond the expiration of the existing lease. OCCL believes that the Navy's continued use of these areas for research, development, testing, and evaluation could potentially contaminate ocean resources and should be analyzed. The DEIS notes that the affected environment is considered the baseline environment without the Proposed Action. OCCL comments that the impact of the existing improvements should be analyzed as they pose significant threats of environmental degradation, particularly erosion of ridges and related shoreline contamination. Regarding KPGO, OCCL questions whether NASA's provision of a use permit to the Navy for use of State land held under General Lease No. 3917 is appropriate and requests that the FEIS clearly explain NASA's authority to do so without the express approval of the Lessor.	The Navy and NASA appreciate this summary of comments from DLNR-Office of Conservation and Coastal Lands (OCCL) which have been identified as comments #74 through #89 below. Please see specific responses to DLNR-OCCL's comments in responses to comments #74 through #89 below.	Land Use and Access
0109	Luke Sarvis	DLNR	8	**6. State Historic Preservation Division (SHPD):** SHPD notes that the DEIS lacks clarity regarding mitigation measures for the eight significant archaeological sites identified in the AIS. The DEIS and FEIS should contain proposed mitigation strategies for significant archeological sites and clear documentation of SHPD concurrence regarding the significance of all evaluated sites. SHPD recommends robust consultation and collaboration with Native Hawaiian Organizations, cultural practitioners, lineal descendants, and community stakeholders in the preparation of the FEIS and requests to be consulted prior to any construction or land-altering activities.	The Navy and NASA appreciate this summary of comments from DLNR-State Historic Preservation Division (SHPD) which have been identified as comments #90 through #93 below. Please see specific responses to DLNR-SHPD's comments in responses to comments #90 through #93 below.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR	9	**7. Division of State Parks (DSP):** DSP is a neighbor of both PMRF and KPGO and would like to formalize and expand existing use agreements for the mutual benefit of all parties. These include use of the State leased land, water infrastructure and service, and existing infrastructure and buildings. Use of a portion of the State leased land at KPGO for helicopter operations is critical to DSP's ongoing operation and maintenance of the Nāpali Coast State Wilderness Park and allowing DSP to convert currently unused land and buildings into a base yard would greatly enhance its management capacity. Finally, DSP echoes LD's concerns regarding large capacity cesspools and reiterates that these systems must be upgraded to septic systems in compliance with Hawaii State Department of Health standards.	The Navy and NASA appreciate this summary of comments from DLNR-Division of State Parks (DSP) which have been identified as comments #94 through #101 below. Please see specific responses to DLNR-DSP's comments in responses to comments #94 through #101 below.	Land Use and Access
0109	Luke Sarvis	DLNR	10	DLNR appreciates the opportunity to comment on this DEIS. We encourage the Navy and NASA to integrate these comments and the attached letters from each division into the FEIS to ensure accurate, complete, and transparent environmental review Mahalo, Ryan K. P. Kanakaʻole First Deputy, Department of Land and Natural Resources Attached Comment Letters: 1. Land Division 2. Commission on Water Resource Management 3. Division of Aquatic Resources 4. Division of Forestry and Wildlife 5. Office of Conservation and Coastal Lands 6. State Historic Preservation Division 7. Division of State Parks	Thank you for your comments, as described above our team has provided responses to detailed comments below.	EIS Process
0109	Luke Sarvis	DLNR, Land Division	11	The Land Division reviewed the subject document and notes that while the subject document is a joint National Environmental Policy Act (NEPA)/Hawai'i Policy Act	The EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) section 11-200.1-31 which states that when a certain action is subject to both National	EIS Process

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				(HEPA) document, the Land Division offers comments specifically as the document relates to the HEPA process as prescribed in Hawai'i Revised Statutes (HRS) Chapter 343 and Hawai'i Administrative Rules (HAR) Chapter 11-200.1. After review of the document, the Land Division has concerns that the document, as currently written, does not meet the requirements of Chapter 11-200.1, HAR as discussed below. Further, the Land Division suspects that even if all of the issues noted below are corrected, the revised document would be much different from the current DEIS and the DEIS would need to be republished to provide further agency and public review and comment. Please be aware, should the Applicant choose to move forward with a Final EIS and not correct the noted issues, Staff may recommend nonacceptance of the Final EIS before the Board of Land and Natural Resources (Board).	Environmental Policy Act (NEPA) and HEPA (Hawai'i Revised Statutes [HRS] Chapter 343), one EIS may be prepared by the federal entity and submitted to comply with HAR Chapter 11-200.1, "so long as the federal EIS satisfies the EIS content requirements of this Chapter, including cultural impacts, and is not found to be inadequate under the NEPA" (HAR section 11-200.1-31(4)). The team understands that as the approving agency, DLNR-Land Division has prepared their comments consistent with their review of the EIS under HRS Chapter 343 and HAR Chapter 11-200.1. The team appreciates that this is consistent with DLNR's expertise with State of Hawai'i's laws and regulations.	
0109	Luke Sarvis	DLNR, Land Division	12	Our concerns as they relate to compliance with Chapter 11-200.1, HAR include the following: • Pursuant to Section 11-200.1-24(a), HAR, the contents of a Draft Environmental Impact Statement (DEIS) "*shall fully declare the environmental implications of the proposed action* *and shall discuss all reasonable foreseeable consequences of the action.*" Further, Section 11-200.1-24(l), HAR states that "*The draft EIS shall include an analysis of the probable impact of the proposed action on the environment ...This analysis shall include...consideration of all consequences on the environment, including direct and indirect effects.*" Currently, the Applicant has defined the proposed action as the retention of "*8,172 acres of state lands on Kaua'i in support of continued military training and testing at PMRF. NASA proposes to retain the use of 23 acres of state lands on KPGO on Kauai in support of maintaining data collection efforts of global significance at KPGO. The proposed action includes current operations that occur on leasehold and easement lands.*" Staff disagrees with this depiction of the proposed action as we believe the scope of the proposed action to be much larger. Staff believes and has communicated to the Applicant and their contractors on numerous occasions, that the scope of the proposed action should include the continuation of any training and testing that is facilitated by the retention of the State-owned lands. This may include training and testing activities on what the Applicant refers to as the fee simple lands, or Main Base, as well as any training and testing activities that occur out in open waters. Our request to expand the scope of the proposed action is further justified by the Applicant's statement in Section 1.1 which states that *"Navy use of these lands is required to maintain technological and safety capabilities supporting PMRF training and testing."* Further justification is provided in the Applicant's discussion under their "No Action Alternative" scenario (Section 2.3.3). In this section, the Applicant states that "*The Navy would not be able to conduct a substantial portion of training and testing events at PMRF supported by the leasehold and easement lands.*" In addition, Table 2-4 summarizes the effects that non-retention of the State lands would have on the PMRF training and testing mission. Effects of the loss of the State-owned lands appear to reduce the Applicant's capacity to conduct certain training and testing missions and therefore, the continuing impacts as a result of these activities should be analyzed and disclosed in the DEIS as it is the retention of State lands that allow such activities to occur.	The Navy appreciates this comment from DLNR Land Division and other commenters. It is an important comment given many suggestions of causal relationships between the Proposed Action and potential impacts of defense mission operations associated with PMRF. The Proposed Action is limited in scope to the acquisition or long-term retention of access to State lands for existing safety buffers, instrumentation, and support facilities for PMRF. The proposed land retention involves no expansion of operations, no increase in training tempo, and no authorization of new operational impacts. Any environmental effects of training and testing operations are the consequence of the Navy's mission execution, not the result of acquiring or leasing State land. Weapons testing, missile launches, inert or live-fire training operations, and any potential marine and air-quality impacts occur under separate operational authorities, are governed by their own environmental compliance processes, and have been addressed in separate NEPA and HEPA analyses (see Sections 1.5 [Scope of Environmental Analysis], 3.1.3 [Introduction to the Affected Environment and Environmental Consequences/Region of Influence], and 3.1.6 [Introduction to the Affected Environment and Environmental Consequences/Relevant NEPA and HEPA Documents Considered in the Analysis] in the Final EIS). These activities are not authorized, expanded, or modified by the Proposed Action. The real estate decision does not change types of weapons tested, operational tempo, launch windows, marine activities, or any aspect of PMRF's mission execution. Therefore, operational environmental effects are not caused by the Proposed Action and they are not analyzed here. Consistent with NEPA (42 United States Code [U.S.C.] section 4321 et seq.) and HEPA (HRS Chapter 343), an EIS analyzes environmental effects that are proximately caused by the proposed action. In a manner consistent with NEPA, HEPA does not require analysis of environmental effects that are not reasonably foreseeable consequences of the proposed action. In practice, under HAR Chapter 11-200.1, effects must be "reasonably foreseeable environmental consequences of the proposed action." Operational training and testing actions arise from independent operational authorities, rather than as consequences of the proposed real estate action. They are therefore not actions to be analyzed under NEPA or HEPA. Potential environmental effects that stem from independent operational decisions—such as the frequency, tempo, or nature of training and weapons testing—do not constitute effects of this real estate action and therefore fall outside the scope of this EIS. Expanding the region of influence (ROI) to encompass all operations and impacts associated with PMRF—air quality, marine biota, acoustic impacts, underwater operations, launch emissions, etc.—would be inconsistent with proper NEPA/HEPA practice. As such, the	Ongoing Activities

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					ROI for this EIS addresses only the geographic area within which the real-estate action and continuation of actions on State land that may cause environmental effects. For these reasons, the Navy respectfully disagrees with assertions that because some aspects of PMRF's mission capability rely on continued access to these lands, the EIS must therefore analyze the environmental effects of the entire testing and training mission, and concludes that the environmental effects of weapons testing and training operations are not effects of the proposed land-retention action and, as such, have been appropriately excluded from this EIS. The Navy appreciates this comment from DLNR Land Division and other commenters. Regarding statements about the No Action Alternative in Chapter 4 (Cumulative Effects) of the Final EIS, the Navy and NASA acknowledge and appropriately fulfill the requirement to describe the consequences of not taking the Proposed Action. The Final EIS is clear that loss of access to the State lands would substantially constrain or eliminate certain of the Navy's defense mission activities at PMRF. However, the consequences of the No Action Alternative do not convert operational environmental impacts into environmental effects of the Proposed Action. Describing potential mission degradation does not imply that retaining the lands causes operational impacts. Under the No Action Alternative, which does not meet the purpose and need, any future changes in the type, tempo, location, or configuration of PMRF operations associated with the loss of land access would require independent operational decisions that would be subject to their own separate environmental review, as appropriate. Because such changes are neither caused by nor reasonably foreseeable effects of the Proposed Action, they are not evaluated as environmental effects under NEPA or HEPA for this action. Accordingly, while the No Action Alternative affects mission capability, it does not yield a reasonably foreseeable change in environmental effects for analysis in this EIS.	
0109	Luke Sarvis	DLNR, Land Division	13	Pursuant to Section 11-200.1-24(i), *"The draft EIS shall include a description of the environmental setting...Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic significance); specific reference to related actions, public and private, existent or planed in the region shall also be included for purposes of examining the possible overall cumulative impacts of such actions.* *In addition, Section 11-200.1-23(l) states that "The draft EIS shall include an analysis of the probable impact of the proposed action on the environment and impacts of the natural or human environment on the action. This analysis shall include consideration of all phases of the action and consideration of all consequences on the environment, including direct and indirect effects. The interrelationships and cumulative environmental impacts of the proposed action and other related actions shall be discussed in the draft EIS."* Staff notes that Section 3.4, Biological Resources, does not provide enough information regarding the Proposed Action's impact on Special Status species. Specifically, the biological opinions (BOs) issued by the US Fish and Wildlife Service (USFWS) and provided by the Applicant in Appendix K, highlights that activities associated with the Pacific Missile Range Facility (PMRF) result in the incidental take of the following species: ʻaʻo (Newell's shearwater), ʻuaʻu (Hawaiian petrel), ʻAkēʻakē (band-rumped storm petrel), ʻōpeʻapeʻa (Hawaiian hoary bat), nēnē (Hawaiian goose), ʻalae ʻula (Hawaiian moorhen), ʻalae keʻokeʻo (Hawaiian coot), koloa maoli (Hawaiian duck), and the aeʻo (Hawaiian stilt). Further, reinitiation of formal consultation with the USFWS was required due to higher than anticipated take levels	Chapter 3 of the EIS includes an analysis of the effect of the Proposed Action on the environment, including all phases of the action and consideration of direct and indirect effects. Chapter 4 of the EIS, as required by HEPA, addresses the cumulative impacts of the Proposed Action. Effects to special status species are discussed in Biological Resources (Section 3.4.2.2.3, Special Status Species) of the Final EIS and include effects from lighting, strike, and habitat loss. Incidental Take Statement information from the 2025 Biological Opinion (BO) for Base Infrastructure Operations and Maintenance at PMRF Site on Kauaʻi, Hawaiʻi; the 2018 BO of the U.S. Fish and Wildlife Service (USFWS) for the Proposed Base-wide Infrastructure, Operations, and Maintenance Activities at PMRF Site, Island of Kauaʻi, Hawaiʻi; and 2014 BO of the USFWS for the proposed PMRF Base-wide Infrastructure, Operations, and Maintenance on Kauaʻi have been incorporated into the Final EIS. Language has been included to explain these PMRF BOs are not affiliated with the Proposed Action for this EIS. Take limits and conservation measures addressed in the 2014, 2018, and 2025 PMRF BOs are specifically associated with other federal actions (i.e., air operations and construction activities), and do not necessarily overlap with the Region of Influence (ROI) for the Proposed Action of this EIS, such as Port Allen. Through the incorporation of the 2014, 2018, and 2025 BOs, and 2023 PMRF Integrated Natural Resources Management Plan (INRMP) in the Final EIS, sufficient information is provided to fully describe the environmental setting, including discussions on rare and unique resources in the ROI.	Biological Resources

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				of ʻaʻo (refer to the 2018 BO) as well as for the nēnē[1], aeʻo, ʻalae keʻokeʻo, ʻalae ʻula, koloa maoli, and ʻōpeʻapeʻa (refer to the 2025 BO). Footnote 1: in the 2025 BO, the nēnē is no longer to be considered a federally listed endangered species as it was downlisted to threatened in 2020. However, the nēnē is still a State listed endangered species.		
0109	Luke Sarvis	DLNR, Land Division	14	While the BOs were provided as an appendix, the technical information found in them was not included in the main discussion section on biological resources. Staff highly encourages that the Applicant be as forthright as possible with the information rather than having the reader search through the appendices for information that would be valuable in the main document. Staff also acknowledges that the BOs may extend beyond the scope of the proposed action, even if amended as discussed above, but Staff believes that they provide a good insight to both primary and secondary impacts to species of concern. Moreso, Staff believes that current take data in relation to the allowable take limits for each species should be included along with a discussion on the Applicant's current progress in implementing the required conservation measures as this information would be considered important for the Board to consider during future decision making.	Thank you for your comment. The Final EIS has been updated to include conservation measures of special status species from the 2025 BO for Base Infrastructure Operations and Maintenance at PMRF Site on Kauaʻi, Hawaiʻi and the 2018 BO of the USFWS for the Proposed Base-wide Infrastructure, Operations, and Maintenance Activities at PMRF Site, Island of Kauaʻi, Hawaiʻi into the Final EIS. BOs are part of compliance with section 7 of the Endangered Species Act, and are issued by the USFWS for other, ongoing actions at PMRF outside the scope of this Proposed Action. The effects discussed and mitigated for in the BOs are not limited to the State lands that are part of the Proposed Action, and this Proposed Action does not impact the implementation of measures described in the BOs. Please see response above regarding take limits incorporated into the Final EIS. As an INRMP partner, the DOFAW regularly provides input on the development of protections for sensitive species and the Navy works regularly with the State to ensure federal and State compliance with laws regarding species conservation.	Biological Resources
0109	Luke Sarvis	DLNR, Land Division	15	Staff further notes that the discussion on erosion and runoff generated on Mākaha Ridge does not take into account the erosion that caused by structures and impervious surfaces located at the site that exist purely because of PMRF's presence. Rather the Applicant focuses fault on the presence of ungulates and their grazing on soil stabilizing vegetation. While Staff does not argue that the ungulates play their part, the structures and other impervious surfaces also exacerbate the situation. Staff also notes that the current BMPs and mitigation measures employed by the Navy only focus on addressing the ungulate issue. No consideration has been given to mitigating the impacts from the impervious surfaces. It should be noted that Mākaha Ridge is located in the Conservation District and runoff directly enters coastal waters just below. Due to its location and the purpose and objectives of the Conservation District, the Applicant should include a more thorough discussion regarding erosion issues and the continuing impact that the issuance of a new long-term disposition would have both to the land and to the PRMF structures themselves (i.e. undermining of structures that may require new construction, etc.)	The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include the presence of Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. The Navy-use impervious surfaces (to include buildings, sidewalks, radar infrastructure, roads) at the Mākaha Ridge parcel make up approximately three percent of total leased area on the Ridge. Furthermore, the leased land itself is just a small portion of the larger area of the watersheds contributing to coastal water quality in the area. The Navy utilizes numerous best management practices (BMPs) in the areas surrounding impervious surfaces, as well as around other parts of the parcel, to help offset erosion at the site. These BMPs and management measures are discussed in Section 3.7.1.4.2.4 (Water Resources/Mākaha and Miloliʻi Ridges) of the Final EIS. These management actions include the installation of (to be completed in 2025/2026) an ungulate exclusion fence around the facilities which will exclude all classes of ungulates, as well as the periodic culling of invasive ungulates within the fenced area. This, combined with the restoration of 6 acres of upland habitat of bare land and outplanting of native species (completed February 2026) allows for sapling growth, revegetation, soil stabilization and decreased levels of erosion. Grass is also maintained along the perimeter of several impervious structures on the parcel (such as cement slabs) which helps absorb water, stabilize the soil, and prevent rapid runoff. A retaining wall has also been installed. The Navy is installing water catchment basins atop structures on the leasehold lands at Mākaha Ridge to capture stormwater for irrigation and other non-potable uses. These catchment basins also help reroute flow from impervious surfaces to a central catchment location which also helps decrease erosion at the site. Combined implementation of these management strategies decreases erosion, reduces sedimentation, and increases water quality in the streams and nearshore environment immediately downslope of the facility. These actions would be bolstered through the implementation of Enhanced Engagement-7 (Chapter 5, Table 5.2-1 of the Final EIS), which would establish success criteria for	Water Resources

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					erosion management actions at Mākaha Ridge. Additionally, the Navy will continue to consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, as defined in the Department of Defense (DoD) Unified Facilities Criteria (1-200-02, *High Performance and Sustainable Building Requirements*). As discussed in Water Resources (Section 3.7.2.2, Alternative 1: Succeeding Current Real Estate Agreements), under Alternative 1, these erosion-reducing measures would not change. The Proposed Action does not include any change in activities or construction. Any future proposed construction would be subject to new environmental analysis and permitting requirements for use within the Conservation District. As described in Water Resources (Section 3.7.2.2.4, Mākaha Ridge), the loss of Navy-funded conservation actions for erosion control at Mākaha Ridge, and the potential removal or demolition of the existing structures could have the potential to change surface water quality in the immediate and downstream areas under the No Action Alternative.	
0109	Luke Sarvis	DLNR, Land Division	16	Regarding the cumulative analysis in Chapter 4, Table 1-5 provides a list of previous environmental review documents as they related to PMRF. Those projects should also be included in Table 4.1.5 especially if the activities are noted as ongoing. For those projects that are no longer ongoing, any long-term impacts from those activities that could still lingering should also be discussed and included in the analysis. In addition, the cumulative analysis should also include the use of the 12 square mile ocean right-of-way and the testing and training activities that the underwater cables support as they are still part of the overall training and testing mission at PMRF. As currently written, it is unclear if past, current and future projects have/will have impacts to natural and cultural resources and thus would add to the impacts of the proposed action. Statements made in this section appear to be relatively vague on how the Applicant reached conclusions of "no cumulative effects".	The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include existing Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS." Additionally, Chapter 4 of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the incremental impact of the Proposed Action with other actions as they may affect the leasehold and easement lands. For those resources where minimal to no effect was identified from the Proposed Action, there is no cumulative effect when the Proposed Action is added to past, present, and reasonably foreseeable future actions.	Ongoing Activities
0109	Luke Sarvis	DLNR, Land Division	17	Pursuant to Section 11-200.1-24(p), HAR The draft EIS shall consider mitigation measures proposed to avoid, minimize, rectify, or reduce impacts, including provision for compensation for losses of cultural, community, historical, archaeological, and fish and wildlife resources, including the acquisition of land, waters, and interests therein. Description of any mitigation measures included in the action plan to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable shall be included..." Staff notes that the archaeological inventory survey (AIS) prepared for PMRF, lacks proposed mitigation as it pertains to compliance with Section 6E-8, HRS. Section 6E-8, HRS requires concurrence on any determination of effect on historic properties from the State Historic Preservation Division (SHPD). In this case, the Applicant identified and evaluated eight sites as being significant. Based on this, Land Division, who would be responsible for ensuring the compliance with HRS Chapter 6E, would most likely propose a determination of "Effects with agreed upon mitigation" to SHPD. Therefore, it would appear prudent that proposed mitigation for archeological sites be included for consideration.	Mitigation Measures, as defined by HEPA, are discussed in Section 5.1 (Existing and Continuing Mitigation Measures) of the Final EIS. The Proposed Action under the action alternatives would not result in significant adverse impacts for which mitigation measures are required. As such, specific mitigation measures for the real estate action are not included herein. The Proposed Action and action alternatives would also incorporate previously approved mitigation measures from prior NEPA and HEPA Proposed Actions. Section 3.2.2 (Archaeological and Architectural Resources/Environmental Consequences) summarizes the effects on historic properties from the Proposed Action, and the Archaeological Inventory Survey (AIS) reports describe the analysis in more detail. The Proposed Action will not result in adverse effects [36 Code of Federal Regulations {CFR) 800.5(a)(1)] or harmful effects [HAR 13-275-7(a)(2)] to historic properties. Thus, there are no effects to historic properties to mitigate.	Archaeological and Architectural Resources

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0109	Luke Sarvis	DLNR, Land Division	18	Staff also notes that the vegetation survey prepared for the Kōke'e Park Geological Observatory (KPGO) recommended several mitigation measures that were not included in the main document that pertain to the endangered Kōpiko.	The vegetation survey for KPGO (Appendix K of the Final EIS) identified the presence of the endangered kōpiko (*Psychotria grandiflora*) and recommended several potential management measures. NASA will coordinate with the State of Hawai'i and/or Kōke'e Resource Conservation Program where appropriate to consider the recommended management measures.	Biological Resources
0109	Luke Sarvis	DLNR, Land Division	19	Further, as stated in our earlier comment, the Applicant only provides current BMPs and mitigation measures as they pertain to ungulates and erosion at Mākaha Ridge. While long-term soil stabilization through the use of native plants is ideal, there is no mitigation proposed to mitigate the immediate impacts that are exacerbated by the presence of structures and impervious surfaces.	See response to comment #15.	Biological Resources
0109	Luke Sarvis	DLNR, Land Division	20	Moreso, Chapter 5 address mitigation and enhanced management measures. Staff had mentioned to the Applicant previously that for the No Action Alternative, it was important to provide, at the bare minimum, best faith efforts that the Applicant would be willing to commit to, regardless of negotiations, regarding the clean-up and/or restoration of the State-lands. Nevertheless, the Applicant left the issue open ended as the decisions are ultimately dependent on "future negotiations."	As described in Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS, details are presently unknown and would depend on negotiations The No Action Alternative in this EIS is evaluated through an extreme case scenario involving removal and disposal of all infrastructure and by assessing the effects that could occur from ground-disturbing activities associated with demolition and removal of existing infrastructure. Although details are unknown for the No Action Alternative, the Navy would follow Department of Navy and DoD procedures and guidance as part of any future actions, and NASA would follow their administration's procedures and guidance. The Navy and NASA's current real estate agreements specifically allow for a range of options from removal to retention of all infrastructure as determined by State and federal negotiations. As such, it would be premature and speculative to assume specific activities for the No Action Alternative. To emphasize the Navy and NASA's commitment to following lawful process under this alternative, text has been added to Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS clarifying that any future actions under this alternative would comply with all applicable State and federal laws. This updated description of the No Action Alternative includes a best faith effort by Navy and NASA to describe what is known for this alternative to meet the requirements for HEPA and NEPA.	Action Alternatives
0109	Luke Sarvis	DLNR, Land Division	21	Regardless of the above issues, Staff reviewed majority of the document, including the appendices provided, and offers the following comments regarding specific sections: 1. Regarding the requested duration of any new long-term land disposition(s) from the State, we note that "long-term" is defined as over 25-years in table RG-1, however, throughout the main body of the document, this was never established again. Please clarify in the main document what the requested lease and/or easement duration(s) would be.	The descriptions of the real estate agreement duration have been updated in the Final EIS to clarify that this would be a minimum duration of 25 years and a maximum duration as negotiated with DLNR. The longest duration of any current real estate agreement is 65 years, per State regulations. This timeframe is reiterated in Section 2.3.1 (Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) and Section 3.1.4.2.1 (Introduction to the Affected Environment and Environmental Consequences/Alternative 1: Succeeding Current Real Estate Agreements) describing Alternative 1.	Purpose and Need
0109	Luke Sarvis	DLNR, Land Division	22	2. In Section 1.1, Staff requests that the Navy povide a more robust discussion regarding their decision to no longer pursue an easement for the 12 square miles of ocean right-of-way and to include better explanation of the Submerged Lands Act and its relation to the doctrine of Navigational Servitude, the U.S. Constitution, and the Admissions Act.	The Navy and NASA note staff request for more discussion regarding the Navy's decision to no longer pursue an easement for the ocean right-of-way adjacent to PMRF. Submerged lands are described in Section 1.1 (Project Introduction and Overview) of the Final EIS because the Navy is not pursuing a new real estate agreement for this area; therefore, the ocean ROW is not part of the Proposed Action. The Navy will continue to use this area pursuant to the retained rights in, and powers of regulation and control of, such land by the United States for constitutional purposes as codified in the U.S. Constitution, Article I, Section 8, Clause 3; Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq.; and the Hawai'i Admissions Act, 48 U.S.C. section 5(i). The Navy's use of submerged lands within the ROW area will remain consistent with current usage for navigation and national defense purposes (i.e., for underwater cables supporting at-sea training ranges). The Navy will continue to comply with applicable laws with associated notification	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					requirements to the State as to these submerged lands. If the Navy's use of this area significantly changes, the Navy will take appropriate actions in accordance with NEPA, and inform other stakeholders as appropriate. It is beyond the scope of this environmental review document to elaborate further. The Navy has engaged in many discussions with DLNR and BLNR board members on this particular subject and welcomes the opportunity to discuss further, parallel to this EIS process.	
0109	Luke Sarvis	DLNR, Land Division	23	3. In Section 1.3.1 please clarify when Mānā well was constructed and by whom.	Per a 1960 paper published by the State of Hawai'i Division of Hydrography, the Mānā Well was dug by the Kekaha Sugar Company in 1938. The small shed structure on the parcel was built in 2007 when the Navy acquired the leasehold land. This information can be found in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) in the Final EIS.	Water Resources
0109	Luke Sarvis	DLNR, Land Division	24	4. In Section 2.3.1 and 3.1.4.2.1, please clarify the scenario in which Alternative 1 was analyzed. While we recognize that long-term was defined as over 25-years, it is unclear the length of time the potential impacts were analyzed under this particular scenario.	The text in Section 2.3.1 (Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) of the Final EIS has been revised to clarify that new real estate agreements would be for a minimum duration of 25 years up to a maximum duration as negotiated with DLNR. The longest duration of any current lease is 65 years, per State regulations.	Action Alternatives
0109	Luke Sarvis	DLNR, Land Division	25	5. In Table 2-7, on page 2-37, please clarify when the last survey was done to assess the presence/absence of endangered Hawaiian picture-wing fly species at and directly adjacent to KPGO and who does the surveys (i.e. an entomologist vs a biologist).	The last terrestrial invertebrate survey at KPGO was conducted in 2021 by the DLNR DOFAW Survey Entomologist as discussed in Section 3.4 (Biological Resources) of the Final EIS. No specialized picture wing fly surveys were conducted in 2024. However, host trees (koa, 'ohe, lapalapa) at Sites A–E were inspected during spring fauna surveys by qualified biologists. No sap seeps or picture-wing flies (*Drosophila* spp.) were observed. Table 2-7 in the Final EIS provides general frequency of survey implementation; for further details regarding the survey please refer to the 2023 PMRF INRMP (Appendix K of the Final EIS).	Biological Resources
0109	Luke Sarvis	DLNR, Land Division	26	6. Given our comments above regarding the scope of the proposed action, Staff disagrees with the Region of Influence (ROI) as defined in Section 3.1.3 with the exception to cultural practices and socioeconomics in which the Applicant identified that the geographic extent of the affected environment is larger.	See response to comment #12 regarding the scope of analysis for the Proposed Action.	Purpose and Need
0109	Luke Sarvis	DLNR, Land Division	27	7. In Table 3.1-4, please clarify if the previous environmental review documents were NEPA and/or HEPA documents.	Table 3.1-4 has been revised in the Final EIS to include a column that identifies whether the document was prepared consistent with HEPA, NEPA, or both.	Ongoing Activities
0109	Luke Sarvis	DLNR, Land Division	28	8. In Table 3.1-4, under the 1993 PMRF Restrictive Easements EIS on page 3-13, it mentions the use of the southern end of Polihale State Park and that people within the easement are notified three hours prior to launch. Please clarify the need for such a short notification period compared to the extensive coordination PMRF does when they notify the public of other closures due to launch activities.	As described in Tables ES-2 and 3.1-4 in the Final EIS (from the 1993 Final EIS for the Restrictive Easements), all persons within the restrictive easement boundary at Polihale State Park would be notified 3 hours prior to launch that they would need to move to the north end of the State Park to ensure that the area within the restrictive easement boundary is clear 20 minutes prior to launch. This would allow any park user approximately 2.5 hours to relocate to the northern end of the park before launch. People traveling to and from the park would be stopped at the control points at the restrictive easement boundary during the time the area is closed. This area would be reopened as soon as the Range Safety Officer declares the area safe. The Navy and NASA are presenting Enhanced Engagements under the action alternatives that propose additional property management protections for the land. Enhanced Engagement-6 in the Final EIS could improve closure protocol and public notification of the activation of restrictive easements during launch activities at PMRF Main Base. Additionally, Enhanced Engagement-5 includes a plan to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	Public Health and Safety

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0109	Luke Sarvis	DLNR, Land Division	29	9. Throughout Section 3.2, Archaeological and Architectural Resources, Staff notes that the Applicant states that certain identified sites have been "determined" to not be NRHP-eligible of HRS Chapter 6E significant and other times they state that sites were not "recommended" as eligible. While the State has no say in the NRHP eligibility, SHPD would need to concur with the determination of significance. Therefore, we ask that the Applicant clarify what sites were reviewed by SHPD and a determination issued. Further, regarding the ammunition magazines at Kamokalā, the Applicant stated that adverse effects to these types of property have been mitigated and therefore they are no longer managed or treated as NRHP-eligible under NHPA or HRS Chapter 6E. We request the Applicant clarify if the sites were ever assessed under HRS Chapter 6E prior to mitigation and if SHPD concurred with the sites no longer being significant under HRS 6E.	The HRS 6E-8 review is anticipated to be completed by the time the Final EIS has been published. All architectural and archaeological resources listed in the Final EIS were reviewed by SHPD for significance. The ammunition magazines at Kamokalā are evaluated in the HRS 6E-8 submittal for the Proposed Action, and Section 3.2 (Archaeological and Architectural Resources) has been updated to reflect this evaluation. The Proposed Action will not result in adverse effects [36 CFR 800.5(a)(1)] or harmful effects [HAR 13-275-7(a)(2)] to these historic properties. Thus, there are no effects to historic properties to mitigate under HRS Chapter 6E-8. The Advisory Council on Historic Preservation's Ammunition Magazine Program Comment applies only to NHPA review of these magazines and similar properties managed by the DoD.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR, Land Division	30	10. Staff requests that the Applicant provide both a map and language in applicable sections that areas that were not surveyed as a part of the AIS coincides with the leases under the jurisdiction of the Agribusiness Development Corporation.	Requested text has been added to Section 3.2.1.5 (Archaeological and Architectural Resources/Archaeological and Architectural Resources Studies) of the Final EIS. Figure 3.2-1 in the Final EIS has been revised to show the Agribusiness Development Corporation (ADC) lands relative to the areas surveyed for archaeological and architectural resources.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR, Land Division	31	11. Section 3.2.1.2, please include a discussion on the Navy's current compliance with 6E-8, HRS regarding archaeological and historic properties.	The HRS 6E-8 review is anticipated to be completed by the time the Final EIS has been published. All architectural and archaeological resources listed in the Final EIS were reviewed by SHPD for significance.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR, Land Division	32	12. Section 3.4.1.1.4.2, Special Status Plants, fails to include relevant information from the vegetation survey prepared for the KPGO site, especially regarding the Kōpiko. The current health and number of plants located at the site should have been provided for the reader to better understand the importance of the presence of these plants. Also, this same section mentions the presence of Alaka'i Swamp pritchardia or loulu at the site. However, no mention of this plant is included in the vegetation survey prepared for the KPGO site.	Information on the current status and health of kōpiko has been added to Section 3.4.1.4.2 (Biological Resource/Special Status Specie) of the Final EIS. Within the KPGO study area, a small population of five individuals was documented, reflecting the broader trend of population decline. Primary threats include habitat degradation from ungulates and herbivory by insects. Alaka'i Swamp pritchardia (loulu) was observed during the KPGO Vegetation Survey and its occurrence is mentioned in Appendix A, page 36 of the Vegetation Survey Final Report of the Kōke'e Park Geophysical Observatory (Appendix K of the Final EIS).	Biological Resources
0109	Luke Sarvis	DLNR, Land Division	33	13. In Section 3.4.2.2, we note that the Applicant has stated that they will continue to comply with HRS Chapter 195D by obtaining a number of permits and licenses but caveats the statement with "as needed." It is unclear who, in this case, makes the determination regarding what permits and licenses are "needed" as the Board would most likely prefer that the Applicant comply with all applicable State laws and apply for all permits and licenses needed for such compliance. Therefore, for clarity purposes, we request that the Applicant determine which permits and licenses they will be applying for and include those in Table 6-2.	Since the Proposed Action does not include any new activities on State land, there is no trigger for compliance with HRS Chapter 195D in this EIS. However, as stated in Section 3.4.2.2 (Biological Resource/Alternative 1: Succeeding Current Real Estate Agreements) of the Final EIS, the Navy and NASA would continue to comply with HAR 13-107, HAR Chapter 13-124, and HRS Chapter 195D, by obtaining the listed permits and licenses as necessary as part of future actions.	Biological Resources
0109	Luke Sarvis	DLNR, Land Division	34	14. In Section 3.5, Land Use, the discussion surrounding Alternative 2 and potential impacts does not explore the impacts of the SLUD and zoning regulations no longer being required, especially the protective measures that are ensured for those lands within the Conservation District.	The Final EIS has added that the loss of Conservation District at Main Base E-1, Mākaha, Miloli'i Ridges, and KPGO would mean that the applicants (Navy and NASA) would not be required to apply to the SOH for Conservation District Use.	Land Use and Access
0109	Luke Sarvis	DLNR, Land Division	35	15. In Section 3.6.2.2.1, we are unclear what the Applicant means when they state that *"The value associated with payments resulting from succeeding real estate agreements and how they are distributed to the County of Kaua'i would be determined following negotiations between the U.S. Government and DLNR."* We ask that the Applicant provide an explanation why they believe that a portion of the payments received from any new real estate agreements would be directly distributed to the County.	Socioeconomics (Sections 3.6.2.2.1 [Main Base, Kamokalā Ridge, Mānā Water Well, Mākaha Ridge, and Miloli'i Ridge] and 3.6.2.3.1 [Main Base, Kamokalā Ridge, Mānā Water Well, Mākaha Ridge, Miloli'i Ridge, and KPGO]) in the Final EIS have been revised to clarify these payments would be distributed to Office of Hawaiian Affairs (OHA), rather than the County of Kaua'i.	Socioeconomics
0109	Luke Sarvis	DLNR, Land Division	36	16. Section 3.7 should include a discussion on impacts to nearshore waters regardless of an expanded Proposed Action scope. Given the location of the project area to the	Drainage and runoff within the ROI are discussed in detail in Section 3.7.1.4.2.6 (Water Resources/Surface Water Quality) of the Final EIS. Based on the publicly	Water Resources

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				shoreline, issues such as drainage and runoff should be discussed in terms of impacts to coastal waters.	available Mānā Plain water quality monitoring project results (https://dbedt.hawaii.gov/adc/manaplain/), contributions to pollution (e.g., total suspended solids and *Enterococcus* bacteria) are lower at the outfalls located on Navy fee simple land compared to the ocean drainage outfall sights that drain from upland and/or at sites located outside of the PMRF boundary.	
0109	Luke Sarvis	DLNR, Land Division	37	17. In Section 3.8, Utilities, we note the use of cesspools both at Mākaha Ridge and at KPGO. The Applicant should be aware that the passage of Act 127 in 2017 requires the replacement of **ALL** cesspools by 2050. All new land dispositions issued by the Department now include a condition that requires the leasees to either convert over to an individual wastewater system or connect to the existing County system.	The Navy and NASA note your concerns regarding the Mākaha Ridge and KPGO use of cesspools, and the U.S. Environmental Protection Act (EPA) and State of Hawai'i mandates for removal. The Navy and NASA expect these requirements to be outlined in the applicable lease/easement agreements. The conditions of the lease and any necessary projects that result from these conditions will be addressed at that time and will require separate environmental analysis. The Navy and NASA will coordinate the closure of the cesspools and the construction of new permitted septic systems prior to 2050, consistent with the requirements of Act 127 and applicable federal and State health and environmental regulations, as required.	Utilities
0109	Luke Sarvis	DLNR, Land Division	38	18. Staff requests a standalone section be added to address impacts to recreation and tourism. The closures of access points and shoreline areas as well as coastal waters and airspace due to training and testing activities should be included for disclosure purposes. Staff recognizes that the Applicant touches on these subjects throughout the document (with the exception to tourism activities which may also be considered recreational i.e. Napali coast tours, helicopter tours, etc. if they exist) however, it is hard to get an overall sense of how much the recreational community on Kaua'i is impacted by the closures. The information complied in one section would help to paint a better picture of the overall situation.	A sub-section has been added to Socioeconomics (Section 3.6) that includes a general description of tourism and recreation in Kaua'i County. The ROI for Socioeconomics is Kaua'i County, and under Alternatives 1 and 2 there would be no change to the frequency of closures that temporarily restrict access in the ROI. An analysis of ongoing effects from temporary closures is included in Cultural Practices (Section 3.3) and Land Use and Access (Section 3.5) of the Final EIS. Also Enhanced Engagement-6 in the Final EIS could improve closure protocol and public notification of the activation of restrictive easements during launch activities at PMRF Main Base.	Ongoing Activities
0109	Luke Sarvis	DLNR, Land Division	39	19. In the overall discussion on the impacts/effects of the "No Action Alternative," and as summarized in Table ES-1 and Table 13.4-1) the potential effects seem to heavily lean toward adverse effects due to assumptions made by the Applicant. As there is always two side to every coin, we ask that the Applicant look at the other end of the spectrum when it comes to their assumptions and recognize that the severity of the impacts/effects of the no action alternative could range dependent on decisions made.	Text has been added to Section 3.1.4.2.3 (Introduction to the Affected Environment and Environmental Consequences/Alternative 3: No Action Alternative) of the Final EIS to clarify that in response to this comment which notes that the outcome of the No Action Alternative is unknown, a level of significance should not be presumed for this alternative. The Final EIS has been revised globally to remove any significance conclusion from the analysis for the No Action Alternative.	Action Alternatives
0109	Luke Sarvis	DLNR, Land Division	40	20. Staff is unclear why No. 4, PMRF Land-Based Training and Testing, in Table 4.1.5 is considered only as a "future" project. Staff notes that if what is being proposed in the forthcoming environmental assessment are new activities and those testing and training activities are supported/facilitated through the use of the State lands, those activities should have and if not, will need to be included and analyzed within this document.	See response to comment #12 regarding the scope of analysis for the Proposed Action. The PMRF Land-Based Training and Testing project is a separate and independent project covered under an independent EA. Cumulative impacts from this Project are analyzed in Chapter 4 of the EIS. The status of Land-Based Training and Testing has been revised to include Past and Present, as well as Future in the "Project Timeframe" category in Table 4.1-1, Cumulative Action Evaluation, in the Final EIS.	Ongoing Activities
0109	Luke Sarvis	DLNR, Land Division	41	21. Staff notes that the premise of Section 5.1 alludes only to new real estate agreements and not to the continued use of the lands and the training and testing activities that the lands support.	Since no adverse significant effects were identified as part of the action alternatives, no new mitigation measures for the Proposed Action have been identified. However, as described in the Chapter 3 resource effects analysis, the Proposed Action would incorporate previously approved mitigation measures from prior NEPA and HEPA actions occurring on the leasehold and easements lands. The text in Section 5.1 (Existing and Continuing Mitigation Measures) of the Final EIS has been revised to refer to the Proposed Action, rather than the real estate transactions, to clarify that the Proposed Action would incorporate previously approved mitigation measures from prior NEPA and HEPA actions in the Project Area.	Ongoing Activities
0109	Luke Sarvis	DLNR, Land Division	42	22. Staff believes that the discussion in Section 6.2, Unresolved Issues, could be expanded to include the duration for any new long-term land dispositions as well as the conditions imposed/negotiated from any new land disposition issued.	Text has been revised in Unresolved Issues (Section 6.2) of the Final EIS to clarify how land retention estates and methods, lease compliance conditions performance and surrender conditions would be determined through negotiations and further environmental analysis.	Land Use and Access

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0109	Luke Sarvis	DLNR, Land Division	43	23. In Section 6.3, Unavoidable Adverse Effects, should include a discussion of the loss of public trust lands regardless of the method of retention. Should you have any questions or concerns regarding our comments, please contact Lauren Yasaka of our Division at 808-587-0431 or at lauren.e.yasaka@hawaii.gov.	The Final EIS does not identify adverse effects to public trust lands. As described in Section 3.5.2.2.1 (Land Use and Access/Main Base, Kamokalā Ridge, Mānā Water Well, Mākaha Ridge, Miloliʻi Ridge, and KPGO) of the Final EIS, under Alternative 1, the U.S. Government would enter into new leases and easements with the State for fair market value of the leasehold and easement lands at Main Base, Kamokalā Ridge, Mānā Water Well, Mākaha Ridge, Miloliʻi Ridge, and KPGO. In this scenario, the State would not lose title to the lands, meaning the lands would not be removed from the public land trust. The State would, however, derive income from these lands to the benefit of the trust. As required by HRS section 10-13.5, 20 percent of lease revenue generated by current real estate agreements would be paid to OHA. The rest of the revenue would go to the Special Land Development Fund per HRS section 171-19. By increasing the amount of funds paid to OHA, Alternative 1 would help increase OHA's ability to provide for the betterment of the conditions of Native Hawaiians, and the increased amount of funds paid to the Special Land Development Fund would increase the State's ability to fulfill the public land trust obligations. Therefore, Alternative 1 would result in long-term beneficial effects related to consistency with public trust obligations. Alternative 2, Effects Analysis states that any lands acquired by the U.S. Government in fee simple would no longer be part of the public land trust; however, the fair market value received in exchange for the land could be used by the State to carry out its public trust obligations. As described in Section 3.5.2.3 (Land Use and Access/Alternative 2: Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds) of the Final EIS, under Alternative 2, the Navy and NASA would pursue a fee simple acquisition of the current leaseholds and obtain use of the same easements. The Navy would not pursue new real estate agreements for easements B-1 and B-2 under the action alternatives as these were temporary construction permits granted in 1977 and are no longer needed. There is widespread belief among Native Hawaiians that these lands should not be alienated because the State would not be able to hold these lands in trust for the benefit of Native Hawaiians and for the public, and that unrelinquished claims to the ceded lands in the Project Area that resulted from the 1892 overthrow of the Hawaiian Kingdom have not been reconciled. The potential effects under Alternative 2 would be similar to those under Alternative 1, a sense of loss and injustice from continued control of ceded lands by the U.S. Government could be a perceived long-term, moderate adverse effects. However, this potential effect could be intensified under Alternative 2 if the real estate action results in a net loss of State lands. Current operations restricting access to leasehold and easement lands at PMRF would continue at the same level as currently implemented. Navy and NASA activities and use within the ROI would not change under Alternative 2. As a result, land use would be consistent with public trust requirements, consistent with regulatory requirements, and would not create changes or new restrictions to land use or access to public land. Accordingly, no unavoidable adverse effects have been identified with the loss of public trust lands. The Navy and NASA appreciate Land Division's participation in the EIS process and thorough review of the Draft EIS.	Land Use and Access
0109	Luke Sarvis	DLNR, CWRM	44	Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally	As discussed in Hazardous Materials and Waste (Section 3.12), the Navy and NASA implement BMPs and Standard Operating Procedures (SOPs) for the protection of groundwater resources within the ROI. Some examples include the use of secondary containment for all fuel and oil storage tanks, adherence to the PMRF Spill	Water Resources

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				protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at http://dlnr.hawaii.gov/cwrm. Our comments related to water resources are as follows: While the Commission recognizes that the Department of Health (DOH) is the regulatory authority for water quality, water quality affects the water quantity available. As stewards of Hawai'i's precious wai, the Commission on Water Resource Management has concerns over military uses and the potential for groundwater degradation, and thus the potential for reducing the availability of water for potable use.	Prevention, Control, and Countermeasure Plan (SPCC), and implementation of Good Engineering Practices. All underground storage tanks at PMRF are equipped with advanced leak detection systems, and the efficacy of these systems is tested every 15 days, far exceeding the current federal requirement to test every 30 days. The Final EIS describes these processes, including soil testing conducted during decommission of underground fuel storage tanks, in more detail in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS. In Public Health and Safety (Section 3.9), a table is provided which lists all pertinent BMPs and SOPs in relation to spill prevention, containment, and response (Table 3.9-1) in the Final EIS. PMRF has developed comprehensive response procedures for incidental release which includes the immediate notification of PMRF dispatch, neutralization of any spill (if possible), and communication with the Hawai'i State Emergency Response Commission (through the Hazard Evaluation and Emergency Response Office) within 30 minutes of discovery. This procedure is discussed in more detail in Section 3.9.1.4.1 (Public Health and Safety/Main Base) of the Final EIS. As discussed in Water Resources (Section 3.7.1.4.1.2, Mānā Water Well), groundwater is pumped at the Mānā Well, and daily water quality monitoring is performed at five established test stations throughout the water distribution system to test for sudden or gradual changes in water parameters. Additionally, monthly samples are taken for testing by State of Hawai'i Department of Health (DOH) for total coliform contamination and sent to a DOH lab for analysis. The DoD has exceeded current EPA guidance and proactively implemented policies to monitor drinking water for per- and polyfluoroalkyl substances (PFAS) at all service owned and operated water systems at a minimum of every 2 years. Per the 2024 Mānā Well Consumer Confidence Water Quality Report, over 70 regulated contaminants that have the potential to be in drinking water were tested in 2023, and in all cases, the levels measured were well within requirements for safe drinking water, and all drinking water testing results were below the method reporting limit for all PFAS compounds. The Navy repeated drinking water testing in 2024 and 2025 (except PFAS testing, as compliance monitoring is not required until 2027 per the EPA) and like previous results, all levels measured were within both EPA and State requirements for safe drinking water. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0109	Luke Sarvis	DLNR, CWRM	45	Historically, there have been instances of military use impacting groundwater. Most notable is the Red Hill Fuel Tank leaks, which have impaired the sole-source aquifer and caused the Honolulu Board of Water Supply to shift their pumpage out to other areas. Additionally, Army training facilities in Waiawa resulted in findings of groundwater contamination in adjacent areas, possibly due to the infiltration of Aqueous-Film-Forming-Foam (AFFF) used for fire fighting training. For these reasons, a better understanding of all of the potential sources of contamination, which may even include oil leaks from vehicles or residual unexploded ordinances, would help to inform the regulatory agencies about best management practices to employ to ensure that groundwater protection is optimized. If you have any questions, please contact Ryan Imata of the Groundwater Regulation Branch at (808) 587-0225 or Katie Roth of the Planning Branch (808) 587-0216.	Comment #44 above provides information on groundwater protection within the ROI regarding fuel storage and outlines water quality monitoring programs in place at PMRF. Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. All hazardous materials on leasehold or easement lands are discussed throughout Hazardous Materials and Waste and a list of SOPs and Instructions Utilized in Management of Hazardous Materials and Waste at PMRF and KPGO are provided in Table 3.12-1 in the Final EIS. Additionally, Table 3.7-2 in the Final EIS, contains a list of BMPs and SOPs that are used in water resource management throughout the ROI.	Hazardous Materials and Waste

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					The Navy and NASA appreciate CWRM's participation in the EIS process and thorough review of the Draft EIS.	
0109	Luke Sarvis	DLNR, DAR	46	The Division of Aquatic Resources Kaua'i Nui District appreciates the opportunity to submit these comments on the The Pacific Missile Range Facility (PMRF) and NASA Kokee Park Geophysical Observatory (KPGO) Real Estate Draft Environmental Impact Statement. The Hawai'i State Department of Land and Natural Resources (DLNR) Division of Aquatic Resources (DAR) manages the state's aquatic resources and ecosystems through programs in ecosystem management, place-based management, and fisheries management. Major programs include projects to: • protect and restore the aquatic environment; • protect threatened and endangered aquatic species and their habitat; • conserve and restore endemic and indigenous aquatic species and their habitat; • combat the introduction of invasive species and reduce their impact on ecosystems; • effectively manage fisheries; and • carry out education and outreach to the public.	The Navy and NASA recognize the responsibilities of DAR.	Biological Resources
0109	Luke Sarvis	DLNR, DAR	47	The main aquatic resource of concern in direct contact with the lease area of PMRF would be protected species, including Hawaiian monk seals and green sea turtles that frequent the beach adjacent to the base. The Division of Aquatic Resources maintains a good relationships with the staff at PMRF. The staff's best management practices (BMPs) for sea turtles and monk seals continue to be sufficient to prevent take of these protected species.	The Navy and NASA thank you for recognizing services provided by PMRF. BMPs used for the responsible and adaptive management of biological resources, such as coordination with the State and federal agencies, as discussed in Section 2.5 (Best Management Practices) of the Final EIS will continue under the Proposed Action.	Biological Resources
0109	Luke Sarvis	DLNR, DAR	48	KPGO proposes to follow BMPs to reduce storm water runoff and minimize impacts to any freshwater resources in the near area.	As discussed in Water Resources (Section 3.7), the Navy and NASA implement BMPs and SOPs for the protection of water resources within the ROI. Some examples include the use of secondary containment for all fuel and oil storage tanks, adherence to the NASA Environmental Management Plan, and regular maintenance of vehicles to reduce minor oil spills.	Water Resources
0109	Luke Sarvis	DLNR, DAR	49	In regards to these land leases, the Division of Aquatic Resources requests that these BMPs continue to be followed to minimize impacts to aquatic resources.	As discussed in Section 2.5 (Best Management Practices) of the Final EIS, BMPs used in the management of natural resources within the ROI, such as management actions used for erosion control and sea turtle conservation, will continue under the Proposed Action and help to minimize effects to aquatic resources within the ROI.	Biological Resources
0109	Luke Sarvis	DLNR, DAR	50	DAR continues to be concerned with the proposed Pacific Missile Range Facility Land-Based Training and Testing activities submitted in 2024 in a Draft Environmental Assessment (EA). Other than green sea turtles basking or nesting Hawaiian monk seals hauled out in or near activity zones, the draft EA does not adequately address the impact of proposed activities to aquatic resources, including habitats or species in nearshore and pelagic environments adjacent to activity zones. The claim that "any effect in or over the water associated with land-based training and testing activities...have been previously analyzed in prior related NEPA documents" (page 1-3) is insufficient. The proposed increase in frequency of these activities warrants a reanalysis of potential impacts.	As described, the Proposed Action (Section 2.1) is to retain real estate agreements with the State of Hawai'i DLNR in support of continued and ongoing military training and testing at PMRF. Please note the Proposed Action discussed in this EIS does not result in increase in frequency of training or testing activities. Conclusions made in regard to effects to aquatic resources in the 2025 PMRF Land-Based Training and Testing Final EA are outside of the jurisdiction of this EIS. The Navy and NASA are "applicants" in the HRS Chapter 343 EIS process and, as such, have proposed the Project as described in Chapter 2 of the Final EIS. The scope of the Project is defined by the area for which the applicants seek real estate agreements with the State of Hawai'i DLNR (leasehold and easement lands identified on Figure 1-2 in the Final EIS). The Project in the Final EIS is defined in Chapter 2 consistent with HAR section 11-200.1-2, which defines Project as the "discrete, planned undertaking that is site and time specific, has a specific goal or purpose, and has potential impact to the environment." As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS."	Ongoing Activities

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					Table 1-5 of the Final EIS provides a comprehensive list of previous environmental documents reviewed in preparation of this EIS, the description of activities for the Proposed Action of each document, a list of resource topics analyzed, and information on whether the Proposed Actions for the previous environment documents occur in, or outside of, the Project Area. Additional details regarding effects to proposed changes to ongoing activities are analyzed in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA and is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0109	Luke Sarvis	DLNR, DAR	51	Prior to any proposed activities, the DAR suggests extensive monitoring of the aquatic resources to establish a baseline understanding of possible impacts to the area. Additionally, continual monitoring should occur after any proposed activities to determine the effect on aquatic resources.	A comprehensive list of BMPs used for responsible and adaptive management of biological resources, including marine resources discussed within the ROI, are outlined in Table 2-7 in the Final EIS. BMPs related to sea turtles include, but are not limited to, daily patrols of beaches on PMRF, protection of nests and use of mitigative lighting during nesting season and increased coordination with DAR for nest excavation if deemed appropriate. Surveys for monk seals are conducted several times per week on beaches on/adjacent to PMRF, and all monk seal haul-outs are reported to National Oceanic and Atmospheric Administration (NOAA) as soon as possible. More BMPs related to monk seals and other aquatic-use species are listed in Table 2-7 of the Final EIS. The Navy's Marine Species Monitoring Program website (https://www.navymarinespeciesmonitoring.us/) serves as an online portal for information on the background, history, and progress of the program, as well as provides access to reports, documentation, data, and updates on current monitoring projects. The website is publicly available.	Biological Resources
0109	Luke Sarvis	DLNR, DAR	52	The impact of leaving spent inert munitions in the environment adjacent to Ka'ula has not been addressed and no measures to remove or clean up the ordnance from the region of impact and surrounding areas have been detailed. It is likely that much of this ordnance will accumulate with previous munitions and unexploded ordnance in the nearshore waters adjacent to the region of impact, contributing to the larger impact of marine debris accumulation at Ka'ula.	The Navy and NASA respect your concerns related to Ka'ula Island. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land. The Navy and NASA appreciate DAR's participation in the EIS process and thorough review of the Draft EIS.	Ongoing Activities
0109	Luke Sarvis	DLNR, DOFAW	53	The Division of Forestry and Wildlife ("DOFAW") received Land Division staff's request to review the Draft Environmental Impact Statement for Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate at State Lands adjacent to the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Located on the Island of Kaua'i, Hawai'i ("PMRF and KPGO DEIS") at tax map keys ("TMKs") (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), and (4) 1-4-001:014 (por.) dated June 2025. The purpose of the PMRF and KPGO DEIS is to discuss the environmental impacts from the Navy retaining use of 8,172 acres of state lands (684 acres of leaseholds; 7,488 acres of easement lands) in support of ongoing	Comment noted.	EIS Process

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				military training, testing, and facility operations at PMRF; and National Aeronautics and Space Administration ("NASA") retaining 23 acres of state lands (16 acres of leaseholds; seven acres of easement lands) in support of maintaining data collection efforts of global significance at KPGO. The current real estate agreements are set to expire between 2027 and 2030. The duration of the real estate agreements will be negotiated if the PMRF and KPGO FEIS are approved by the Board of Land and Natural Resources ("Board").		
0109	Luke Sarvis	DLNR, DOFAW	54	DOFAW staff reviewed the PMRF and KPGO DEIS in conjunction with associated documents, utilizing their subject matter expertise, and provided comments on whether the PMRF and KPGO DEIS represent an informational instrument that fulfills the intent and provisions of Chapter 343, HRS, and adequately discloses and describes all identifiable environmental impacts. DOFAW identifies issues in the PMRF and KPGO DEIS grouped by administrative rules from Chapter 11-200.1, Hawaii Administrative Rules ("HAR"), that warrant further explanation. DOFAW reviewed the PMRF and KPGO DEIS in conjunction with biological opinions included in volume 4 of the DEIS and the final draft of the "Integrated Natural Resource Management Plan Pacific Missile Range Facility Islands of Kaua'i, Ka'ula, and Ni'ihau State of Hawai'i" dated December 2023 ("INRMP") because these documents were reference documents for natural resource management actions in the PMRF and KPGO DEIS.	The Navy and NASA appreciate DOFAW's careful review of these supporting studies. As part of the effort to keep DOFAW informed on the studies that were prepared for this EIS, the PMRF Natural Resource Manager contacted Kaua'i Branch Manager at DOFAW expressing the Navy's interest to share cultural and natural resource work plans in support of this EIS on August 22, 2023. The PMRF Natural Resources Manager sent work plans for the PMRF Wetland Delineation Survey, the KPGO Hoary Bat Survey, the PMRF Fauna Survey, and the PMRF Flora Survey on August 22, 2023, and September 11, 2023. The PMRF Natural Resource Manager sent final reports for the PMRF Flora Survey and the PMRF Wetland Delineation Survey on February 14, 2024 and the PMRF Fauna Survey was sent on June 28, 2024. PMRF sent the Final PMRF Hoary Bat Survey to DOFAW on January 24, 2025. NASA sent the final reports for the KPGO Hoary Bat Survey, the KPGO Fauna Survey, and the KPGO Vegetation Survey to DOFAW on August 5, 2025. The Navy and NASA look forward to ongoing and future coordination regarding cultural and natural resource work with DOFAW.	Biological Resources
0109	Luke Sarvis	DLNR, DOFAW	55	<u>I. Proposed Action and Alternatives</u> HAR §11-200.1-24(d)(1) states, *"The draft EIS shall contain a summary that concisely discusses the following: (1) Brief description of the action; [and]... (4) Alternatives considered..."* HAR §11-200.1-24(h) states, *"The draft EIS shall describe in a separate and distinct section discussion of the alternatives of no action as well as reasonable alternatives that could attain the objectives of the action. This section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions. Particular attention shall be given to alternatives that might enhance environmental quality or avoid, reduce, or minimize some or all other adverse environmental effects, costs, and risks of the action."* The Proposed Action explains that the Navy and NASA want to retain use of state lands described in the PMRF and KPGO DEIS, and three alternatives explain how the Navy and NASA would retain such lands. DOFAW prefers that Navy and NASA include the preferred method of retention in the explanation of the Proposed Action to make it easier for the reader to understand the Proposed Action in its entirety. Of the three alternatives, DOFAW prefers Alternative 1 and the No Action Alternative. In Alternative 1, the Navy and NASA would renew the lease and easement agreements. In the No Action Alternative, the Navy and NASA would not renew the lease and easement agreements. These alternatives are preferred because the State would continue to hold fee title to the affected parcels.	The Navy and NASA appreciate that DOFAW prefers that the Final EIS includes the Navy and NASA's preferred alternative; however, it is not a requirement in HAR Chapter 11-200.1 that a preferred alternative be identified. As the decision-makers for the HEPA process, BLNR will utilize the information in the Final EIS to determine whether or not to accept the Final EIS based on "whether the final EIS, in its completed form, represents an informational instrument that fulfills the intent and provisions of Chapter 343, HRS, and adequately discloses and describes all identifiable environmental impacts and satisfactorily responds to review comments" (HAR section 11-200.1-28). The Navy and NASA, as the decision makers for the NEPA process, will utilize the information in the Final EIS including cultural consultations to prepare a Record of Decision that identifies the environmentally preferable alternative and identify and discuss all such factors, including any essential considerations of national policy, that the agency balanced in making its decision and state how those considerations entered into its decision. The Navy and NASA note DOFAW's preference for Alternatives 1 and 3.	Action Alternatives
0109	Luke Sarvis	DLNR, DOFAW	56	DOFAW does not support Alternative 2, which involves conveying the leased land to the federal government in fee simple. Conveying the leased land would result in a permanent loss of public access and community use of these lands. It would also diminish Department oversight and weaken the ability to ensure proper environmental stewardship and long-term resource management over these lands. The PMRF and KPGO DEIS does not provide sufficient information for the Board to determine that public access and enforcement of state law would occur if these lands were conveyed to the federal government.	Comment noted. The Navy and NASA note DOFAW's concerns with Alternative 2. Potential effects to public access as well as to natural and cultural resources under this alternative are analyzed in Chapter 3 in the Final EIS. The analysis of this alternative also considers the federal requirements that Navy and NASA would follow in Chapter 3 in the Final EIS.	Action Alternatives

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0109	Luke Sarvis	DLNR, DOFAW	57	II. Permits and Approvals from the Division of Forestry and Wildlife HAR §11-200.1-24(d)(6) states, *"The draft EIS shall contain a summary that concisely discusses the following: ...(6) Compatibility with land use plans and policies, and a list of permits or approvals..."* DOFAW 's support for Alternative 1 is contingent upon the Navy and NASA implementing recommendations from the Department on the responsible management of the lease and easement lands. Leases and easements should include a dedicated fee to support stewardship of natural resources in the surrounding areas, and a market-based fee schedule should be applied to communications and utility sites. DOFAW requests to preserve the ability to regulate public access to adjacent DOFAW-managed lands through easement and leased lands, enforce relevant laws, and coordinate with federal partners to address invasive species threats and monitor special-status species on the easement and leased lands. Navy should address the following permit and access issues related to hunting opportunities and ungulate control in the PMRF and KPGO DEIS: 1. DOFAW requests that the Navy and NASA continue to control ungulates within the lease and easement lands, utilizing public hunters, if possible. Ungulate control is crucial for enhancing the survival of native species in these areas. 2. Section 3.5.1.5.2 states that, "[h]unting is allowed on portions of the restrictive use easement at Main Base. DOFAW requests that more information on how the public can participate in the hunting program on Main Base be presented in the PMRF and KPGO DEIS. 3. Agribusiness Development Corporation and the Navy are both entitled to certain uses of the land within Easement 106. Currently, public access is allowed across Kiko Road to access the Kekaha Game Management Area through the Mana Tunnels hunter check-in station. DOFAW requests that public access through the Mana Tunnels hunter check-in station on Kiko Road be continued. A discussion of public hunter access through the easement area to Kekaha Game Management Area should be included in Section 3.5.1.5.2. 4. Future real estate documents should provide alternative access for the public to enter the Kekaha Game Management Area, should Easement 106 need to be closed by the Navy.	The Navy and NASA note DOFAW's request for terms and conditions in new real estate agreements that include a dedicated fee to support long-term protection of natural resources in the surrounding areas, a market-based fee schedule should be applied to communications and utility sites, ability for DOFAW to regulate public access to adjacent DOFAW-managed lands through easement and leased lands, ability for DOFAW to enforce relevant laws, and ability for DOFAW to coordinate with federal partners to address invasive species threats and monitor special-status species on the easement and leased lands. Terms and conditions of new real estate agreements would be identified during negotiations. Text has been added to Section 2.3.1 (Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) of the Final EIS to clarify this. It should also be noted that the Navy currently collaborates with DOFAW, a Sikes Act partner, regarding development, implementation, and evaluating actions (including invasive species management) in the INRMP and would continue to do under all the alternatives analyzed in the Final EIS. Effects to land use and access on leasehold and easement lands on PMRF and KPGO are discussed in Section 3.5.2 (Land Use and Access/Environmental Consequences) of the Final EIS. On September 28, 2023, the Navy and State of Hawai'i signed a cooperative agreement for establishing conservation programs around PMRF. The goal of the agreement is to use the award toward various conservation and land management projects over the next 5 years (see Section 3.5.1.5.3 [Land Use and Access/Conservation Efforts on PMRF] of the Final EIS). The Proposed Action would preserve the Navy- and NASA-funded natural and cultural resource management activities on the leasehold and easement lands. The Proposed Action would not change any use or maintenance of existing infrastructure and would not involve construction, renovation, or demolition of existing facilities. Additionally, Navy funding for resource management actions and public use programs are described in Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS; pursuing Readiness and Environmental Protection Integration (REPI) projects; continuing general natural resource management as identified in the PMRF INRMP; and continuing cultural resource management as identified in the PMRF ICRMP (see Table 1-4 in Section 1.3.6 [Background/Environmental Management and Protection] of the Final EIS) would continue as currently in place. Text has been added to Section 3.5.1.5.2 (Land Use and Access/Hunting) of the Final EIS to clarify that hunting is allowed on portions of the restrictive use easements at Main Base. Access to fee simple parcels on PMRF for hunting and scouting activities is controlled under Pacific Missile Range Facility Instruction (PMRFINST) 1710.2A, Pacific Missile Range Facility Hunting Instruction. For safety and security, hunting on fee simple parcels on PMRF is limited to authorized personnel as described in PMRFINST 1710.2A. Under the Proposed Action, access to and across leaseholds and easement parcels would not change. Therefore, the Proposed Action would not result in adverse effects to public access including hunting activities within the ROI. The Navy and NASA are presenting Enhanced Engagements under the action alternatives that propose additional property management protections for the land. Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. As part of the development of this Access Management Plan, the PMRF staff will meet with stakeholders to all access concerns	Action Alternatives

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					and try to address with an improved process for access, including requests to use Kiko Road to access the Kekaha Game Management Area through the Mānā Tunnels hunter check-in station. As described above, terms and conditions (including alternative access for the public to enter the Kekaha Game Management Area, should Easement 106 need to be closed by the Navy) of new real estate agreements would be addressed during negotiations.	
0109	Luke Sarvis	DLNR, DOFAW	58	Navy and NASA should ensure the following issues concerning DOFAW permitting and agreements are followed in future actions: 1. The Sikes Act requires most military installations within the United States to develop and implement a comprehensive natural resource conservation and management plan, known as an Integrated Natural Resource Management Plan ("INRMP"). The PMRF and KPGO DEIS should provide a clearer description of the entities involved in developing the INRMP, including when the current INRMP expires and when a new INRMP would be developed under new real estate agreements. The INRMP should include provisions to periodically evaluate the effectiveness of best management practices and EMMs, including timelines and adaptive management provisions, if goals are not met. The PMRF and KPGO DEIS should briefly describe these periodic evaluations. a. DOFAW requests that Navy and NASA: i. Coordinate with DOFAW when developing, implementing, and evaluating actions in the INRMP. The INRMP needs clear and measurable goals. ii. Share these data with DOFAW Kaua'i Branch staff and other agency partners staff annually or biannually. iii. Add management and mitigation of listed plant species missing from the INRMP, such as *Psychotria grandiflora*. b. The lease and easement should contain terms that bind the Navy and NASA to benchmarks for the protection of natural resources. 2. DOFAW Kaua'i Branch should be consulted if any actions are planned within a forest reserve that may trigger the need for a Special Use Permit, Access, or Collections permit.	1. Sikes Act partners include the USFWS, NOAA, National Marine Fisheries Service, and DLNR DOFAW. These partners participate in INRMP reviews by providing subject matter expert recommendations and participate in project development and/or implementation. The Sikes Act requires that INRMPs be reviewed for operation and effect regularly by the installation, the USFWS, and DOFAW on a regular basis, but not less often than every 5 years. The decision on whether to update or revise the INRMP is based on the results of these reviews. Metrics have been developed to assess the effectiveness of the INRMPs (Appendix K of the Final EIS). The language provided above was incorporated into Section 3.4.1.2 (Biological Resources/Regulatory Setting) of the Final EIS. i. The Navy and NASA will continue to coordinate with DOFAW on development, implementation, and evaluating actions in the INRMP. ii. Natural resources observational and geospatial data relating to PMRF and KPGO are stored in the Natural Resources Program database which is managed by Natural Resources staff at PMRF. As discussed in Strategy 5 of the 2023 PMRF INRMP, under Section 4.1.6 (Data Collection and Database and Records Management) of the 2023 PMRF INRMP, PMRF coordinates data sharing with natural resources partner agencies such as USFWS, DLNR, and NOAA, and coordinates common data sharing whenever possible (Appendix K of the Final EIS). iii. The recent discovery of *Psychotria grandiflora* will be included in the next revision of the PMRF INRMP. If future Navy or NASA actions have the potential to affect this species, a reinitiation of consultation will occur with USFWS. b. As described in Section 3.4 (Biological Resources) of the Final EIS, PMRF maintains an up-to-date INRMP. The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. 2. DOFAW would be consulted if any Navy or NASA actions were planned within a forest reserve that triggered the need for a Special Use Permit, Access, or Collections permit.	Biological Resources
0109	Luke Sarvis	DLNR, DOFAW	59	III. <u>Discussion of Impacts to Native and Listed Species on All Leased Lands</u> HAR §11-200.1-24(a) states, *"The draft EIS, at a minimum, shall contain the information required in this section. The contents shall fully declare the environmental implications of the proposed action and shall discuss all reasonably foreseeable consequences of the action. In order that the public can be fully informed and that the accepting authority can make a sound decision based on the full range of responsible opinion on environmental effects, an EIS shall include responsible opposing views, if any, on significant environmental issues raised by the proposal."* HAR §11-200.1-24(i) states, *"The draft EIS shall include a description of the*	Thank you for outlining these HAR.	Biological Resources

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				environmental setting, including a description of the environment in the vicinity of the action, as it exists before commencement of the action, from both a local and regional perspective. Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic significance); specific reference to related actions, public and private, existent or planned in the region also be included for purposes of examining the possible overall cumulative impacts of such actions..." HAR §11-200.1-24(p) states, *"The draft EIS shall consider mitigation measures proposed to avoid, minimize, rectify, or reduce impacts, including provision for compensation for losses of cultural, community, historical, archaeological, and fish and wildlife resources, including the acquisition of land, waters, and interests therein. Description of any mitigation measures, including in the action plan to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable shall be included..."*		
0109	Luke Sarvis	DLNR, DOFAW	60	A. Best Management Practices The Enhanced Management Measures ("EMMs") summarized in Section ES.5 of the Executive Summary, Table 3.14-1 Summary of Potential Environmental Effects, and Table 5.2-1 PMRF and KPGO Proposed Enhanced Management Measures, are not descriptive enough to show alignment with laws and policies governing Department actions to allow the Board to make a sound decision on the full range of environmental impacts. The PMRF and KPGO DEIS should provide a summary of site-specific conservation goals for each leased area, rather than just general best management practices and EMMs. The Navy and NASA should more clearly outline how they will jointly or separately manage their respective land management responsibilities, particularly where overlapping infrastructure and conservation areas exist.	The Final EIS presents Enhanced Engagements consistent with applicable environmental requirements. These engagements are intended to provide a general framework for minimizing potential impacts while maintaining flexibility. They have been expanded in the Final EIS in Section 5.2 (Proposed Enhanced Engagements) to include the following: site-specific conservation goals, how and who engagement will be conducted with, and measurement goals. The Navy and NASA will continue to coordinate management of their respective responsibilities, including in areas of overlap, in accordance with existing plans and consultations.	Mitigation and EMMs
0109	Luke Sarvis	DLNR, DOFAW	61	The Navy should further discuss the following issues concerning wildland fire management: 1. The Navy should include its plan for removing deadfall (woody debris) in Section 3.3.1.3 to reduce wildfire risk. 2. The Navy could improve and increase the availability of water resources within PMRF and on the easement and leased lands. Perform upgrades to water infrastructure in a timely manner. 3. Ensure clearance for above-ground utility lines to minimize the chances of wildfire. Include flora and fauna surveys prior to clearing vegetation to ensure no significant resources will be put at risk by the action. 4. Mākaha Ridge is a high-hazard area with very few wildland fire management capabilities. The Navy should have a fire response plan and a rapid response capability for this area. 5. Develop and share emergency mitigation plans for leased lands with permanent Department of Defense staff and DOFAW Kaua'i Branch staff.	Wildfire management in the ROI is addressed in Section 3.9 (Public Health and Safety) of the Final EIS. Please see below for responses to your specific concerns: 1) As explained in the 2023 PMRF INRMP (Appendix K) and Table 2-7 (Best Management Practices) of the Final EIS, PMRF removes deadfall in high risk areas and replants with low fire risk vegetation as a wildfire management strategy. Although Section 3.3.1.3 (Cultural Practices/Predictable Environmental Trends), does not discuss wildfire, information on wildfire can be found in several other resource sections including Biological Resources (Section 3.4.2.2.1, Vegetation) and Public Health and Safety (Section 3.9.1.4.1, Main Base) in the Final EIS. 2) As discussed in Water Resources (Section 3.7.1.4.2.4, Mākaha and Miloli'i Ridges), the Navy is installing water catchment at Mākaha Ridge to capture storm water runoff for various uses, including for fire suppression, and works with ADC to manage water within the canals that provide water use across Mānā Plain. The Navy performs upgrades to water systems when necessary and as appropriate. As discussed in Section 3.7.1.4.1.2 (Water Resources, Mānā Water Well), the current average pumping rate at Mānā Water Well is approximately 1,400 gallons per minute (gpm), or approximately 2 million gallons per day. Although normal operations do not require this amount on a continual basis, the allotted pumping capacity allows PMRF to utilize the 1,400 gpm if needed in the event of an emergency. 3) The Navy monitors above ground utility-lines and removes brush as needed to minimize the risk of wildfire. As discussed in Biological Resources (Section 3.4.2.2.3, Special Status Species) in the Final EIS, in order to minimize impacts to special status	Public Health and Safety

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					wildlife, trimming or removal of trees greater than 15 feet during Hawaiian hoary bat pupping season (June 1 through September 15) is not permitted. 4) The Navy helps maintains a firebreak within the Pu'u Ka Pele Forest Reserve, which includes Mākaha Ridge. The PMRF Brush and Wildland Firefighting Plan, which establishes procedures for firefighting, also includes Mākaha Ridge. This plan is publicly available and can be found on the EIS website (https://pmrf-kpgo-eis.com/documents/). This information can be found in Public Health and Safety (Section 3.9.1.4.4, Mākaha Ridge) in the Final EIS. 5) Emergency mitigation plans for leased lands are shared with all PMRF staff. The Navy is willing to share any emergency management plan that pertains to non-DoD staff with DOFAW Kaua'i Branch staff on request as permitted. PMRF staff regularly work with local emergency management officials to support wildfire fighting response. This information can be found in Public Health and Safety (Section 3.9.1.4.1, Main Base) in the Final EIS.	
0109	Luke Sarvis	DLNR, DOFAW	62	The Navy and NASA should further discuss the following issues concerning invasive species control: 1. Describe the programs in place to reduce the introduction of invasive species. The Navy should describe and ensure the implementation of sanitation protocols for all vehicles, equipment, and tools moving between sites to minimize the spread of invasive species. This includes implementing best management practices for minimizing introductions by government personnel, contractors, and residents. 2. Consult with DOFAW on generating a list of incipient weeds that should be targeted by PMRF staff for eradication on leased lands. Update this list annually. 3. Add more information from the INRMP to Section 4.1.3 to capture the scope, history, specific priority species, and interagency coordination for general nuisance and invasive animal management. Include a comprehensive list of invasive species from the INRMP, a description of early detection methods and rapid response coordination, and the roles of agency partners working on this issue. Add the success of USDA Wildlife Services and DOFAW from 2006 to present to show institutional continuity and accountability in addressing invasive species issues. 4. NASA should contact Kōke'e Resource Conservation Program ("KRCP") to coordinate weed control of *Ligustrum sinsense*, *Coccinia grandis*, and *Pyracantha angustifolia*. NASA should include a plan for controlling these species at KPGO.	Invasive species management in the ROI is addressed throughout Section 3.4.1 (Biological Resources/Affected Environment) of the Final EIS. Please see below for responses to your specific concerns: 1. Invasive species control is described in detail, to include vegetation and wildlife management, in Table 2-7 of the Final EIS. BMPs for personnel and contractors are also addressed in Table 2-7. Potential movement of invasive species, via equipment of vehicle, was previously analyzed in the 2008 Hawaii Range Complex Final EIS/OEIS and the 2010 PMRF Intercept Test Support EA/OEA. Both of these NEPA documents are addressed in Table 3.1-4 of the Final EIS and are available on the EIS website at https://pmrf-kpgo-eis.com/documents. Examples of such control measures include military customs inspections for prohibited animals, soil, seeds, and other pests from cargo as well as vehicle and equipment wash downs between PMRF Main Base and KPGO. 2. Recommendations of incipient weeds that should be targeted by PMRF staff are encouraged during the annual PMRF INRMP update meetings. PMRF also maintains a strong working relationship with Kaua'i Invasive Species Committee (KISC) for invasive species management as discussed in the 2023 PMRF INRMP (Appendix K) in the Final EIS. 3. Information regarding invasive species has been included in Section 3.4.1 (Affected Environment) in Biological Resources of the Final EIS. Interagency coordination for general nuisance and invasive species is discussed throughout Section 3.4 and Section 2.5 (Best Management Practices) of the Final EIS. Partners include the State (KISC), U.S. Department of Agriculture (for assistance with predator control efforts), and USFWS, who consult in the creation of a Hazard Analysis and Critical Control Point Plan or a similar invasive species risk assessment plan. A comprehensive list of introduced plant/wildlife species is located in the first/second section of Appendix C of the 2023 PRMF INRMP (page 69-95/98-110). The 2023 PMRF INRMP Appendices are located on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources

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					4. Your comment is noted by the Navy and NASA. NASA will contact the Kōkeʻe Resource Conservation Program to coordinate a plan for weed control of *Ligustrum sinense*, *Coccinia grandis*, and *Pyracantha angustifolia at KPGO*.	
0109	Luke Sarvis	DLNR, DOFAW	63	The Navy and NASA should further discuss the following issues related to plant management: 1. The Navy should incorporate xeriscaping and reduce impermeable surfaces within the infrastructure footprint. 2. Collaborate with DOFAW on native plant restoration projects on leased lands.	Plant management in the ROI is addressed throughout Section 3.4.1 (Biological Resources/Affected Environment) of the Final EIS. Please see below for responses to your specific concerns: 1. As stated in Table 2-7 of the Final EIS, xeriscaping is only permitted on PMRF if it does not act as a nēnē attractant (Section 2.5, Best Management Practices). The Navy will continue to consider the use of green building practices within the ROI, such as pervious pavement and landscaping with native vegetation, as defined in the DoD Unified Facilities Criteria (1-200-02, *High Performance and Sustainable Building Requirements*). Please see response to comment #16 for more information on impermeable surface footprint and native plant restoration at Mākaha Ridge leasehold parcel. 2. Native plants restoration efforts, in collaboration with DOFAW and the community, occurred at Kawaiʻele Waterbird Sanctuary, located just outside of the PMRF installation. The Navy will continue to collaborate and work with DOFAW, a Sikes Act partner.	Biological Resources
0109	Luke Sarvis	DLNR, DOFAW	64	Navy and NASA should further discuss the following terrestrial invertebrate and pollinator management issues: 1. Integrate invertebrate survey results into mitigation planning and include how findings inform landscaping, pest control, and habitat design. 2. Discuss commitment to avoid using harmful insecticides (e.g., Neonicotinoids) to be consistent with INRMP best management practices. 3. Provide explicit protections or management objectives for at-risk pollinators and native arthropods. 4. Ensure surveys of Hawaiian picture-wing flies are conducted in collaboration with DOFAW and copy DOFAW on survey reports.	Please see below for responses to your concerns related to terrestrial invertebrates and pollinators: 1. As stated in Section 4.1.5 of the 2023 PMRF INRMP (Appendix K of the Final EIS), to date, no native pollinator-specific protection or enhancement programs have been undertaken at PMRF; however, measures that will benefit pollinators include the increased use of native species in landscape plantings and in habitat restoration areas. PMRF will integrate recent invertebrate survey findings when applicable, through a formal section 7 consultation. The proceeding biological opinion would include mitigation measures and conservation measures. 2. All pesticides, included on the Navy's Authorized Use List, are used in accordance with the instructions on the label and applied by a DoD or State-certified applicator. Pesticide use at PMRF is discussed in more detail in Hazardous Material and Waste, Section 3.12.1.4.4 (Mākaha Ridge) and in the 2023 PMRF INRMP (Appendix K) of the Final EIS. The use of neonicotinoids at PMRF sites is prohibited as stated in Table 2-7 of the Final EIS. 3. Management objectives for at-risk pollinators and native arthropods include monitoring, collaboration with other agencies, protection and enhancement of vegetative communities that support these species (Section 4.1.5 of the 2023 PMRF INRMP, Appendix K of the Final EIS). 4. The last terrestrial invertebrate survey at KPGO was conducted in 2021 by the DLNR DOFAW Survey Entomologist as discussed in Section 3.4 (Biological Resources) of the Final EIS. Table 2-7 of the Final EIS provides general frequency of implementation, and for further details regarding the survey please refer to the 2023 PMRF INRMP (Appendix K) of the Final EIS. Future PMRF and KPGO biological surveys will continue to be conducted in collaboration with DOFAW. The Navy and NASA will continue to provide copies as is currently conducted under the Programmatic Agreement. NASA will coordinate with the Navy to ensure consistency with PMRF's	Biological Resources

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					INRMP practices and procedures, to include terrestrial invertebrate and pollinator management issues.	
0109	Luke Sarvis	DLNR, DOFAW	65	In addition to the categories above, the Navy and NASA should identify how they will fund and prioritize cultural and natural resource management objectives, including establishing dedicated funding sources to support these objectives.	The Navy has a mechanism to fund specific natural resource management programs. The DoD's REPI Program facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities, as discussed in Section 3.4.1.4 (Biological Resources/Existing Conditions) of the Final EIS. The evaluative process for funding REPI buffer projects starts with Military Services first identifying projects at the installation or range level in response to current or anticipated encroachment threats to mission capabilities and then develop them with local partners. The Military Services then request funding for their portfolio of projects from the REPI Program annually. The Office of the Secretary of Defense (OSD) uses tailored qualitative and quantitative criteria to evaluate the proposals and works with the Services to take into consideration the value and priority of the missions being protected. OSD also encourages proposals that provide multiple benefits to the community and environment and strengthen partner cost-sharing. For further details, visit the REPI website at www.repi.mil.	Biological Resources
0109	Luke Sarvis	DLNR, DOFAW	66	The Navy should further discuss the impacts of rocket launches on the surrounding environment and their contribution to global climate change.	As discussed in Air Quality and Greenhouse Gases (Section 3.10.2.2.1, Main Base, Kamokalā Ridge, Mānā Water Well, Mākaha Ridge, and Miloli'i Ridge) in the Final EIS, it should be noted that aircraft operations and rocket launches occur within fee simple lands but contribute to the overall air quality within the ROI. Effects from these actions have been previously analyzed in Navy NEPA documents such as the 1998 PMRF Enhanced Capability Final EIS, 2008 Hawaii Range Complex Final EIS/OEIS, and the 2018 Hawaii-Southern California Training and Testing Final EIS/OEIS. As discussed in Section 3.10.2.4 (Air Quality and Greenhouse Gases/No Action Alternative) of the Final EIS, long-term air quality effects under the No Action Alternative would be reduced if operational activities are subsequently reduced at PMRF. The level of reduction cannot be quantified, but any reduction in operations would result in a reduction in all air-emitting activities associated with these activities. Therefore, long-term air quality effects would be reduced compared to existing levels. The Navy takes the health and safety of the public seriously, and the Final EIS includes the safety measures that minimize any risk to the public in Section 3.9 (Public Health and Safety). Some of these measures include, but are not limited to: (1) a detailed ground safety procedure to be followed by launch operations before, during, and after launch operations at PMRF including public notification and zone clearing; (2) the presence of PMRF's fire department, Crash/Fire, at all launch activities; (3) regular mowing of flammable vegetation near launch sites and pre-soaking of surrounding areas with water; (4) stringent policies and adherence to ordnance transportation and storage; and (5) staff training and alignment with the PMRF SPCC Plan which outlines requirements for operation and testing of fuel and oil tanks and spill response. Section 3.12 (Hazardous Materials and Waste) in the Final EIS discloses all materials that produce hazardous waste (and universal waste) and discusses the associated management actions in place to minimize and properly dispose of all waste produced on the leasehold and easement lands, including hazardous waste. Effects to biological species from launches are described in Section 3.4.2 (Biological Resources/Environmental Consequences) in the Final EIS. Although impacts regarding	Ongoing Activities

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					global climate change are outside the jurisdiction of this EIS, please refer to Section 3.10 (Air Quality and Greenhouse Gases) of the Final EIS for more information on the impacts to air quality from activities conducted on leasehold and easement lands. The Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS), Appendix A, *Military Readiness Activity Descriptions*, and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA provide extensive detail on launch operations conducted at PMRF. These documents are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0109	Luke Sarvis	DLNR, DOFAW	67	Navy should include a discussion of runoff control for current structures in Section 3.3.1.1. The Navy should not only be concerned with pesticide use but also with the sediment and particulates that contain pesticides. The types of soils listed in the PMRF and KPGO DEIS absorb chemicals and could pose a significant downstream risk, especially during storm events.	The Navy has been collaborating with stakeholders on water resource management in west Kaua'i as a committed partner in a two-decade water quality monitoring project across the Mānā Plain, which makes up a large percentage of the Cultural Practices ROI shown in Section 3.3.1.1 (Cultural Practices/ROI) of the Final EIS. The Navy has worked with ADC to allow access for water quality monitoring at several outfalls located on Navy fee simple land since the inception of the most recent program and works closely with other partners involved in the project. Tests for the presence of pesticides, heavy metals, and hydrocarbons have been conducted and all ADC Mānā Plain water quality monitoring data since September 2020 is publicly available on the ADC website (https://dbedt.hawaii.gov/adc/manaplain/). PMRF follows an Installation Integrated Pest Management Plan, as discussed in Hazardous Materials and Waste (Section 3.12.1.4.4, Mākaha Ridge) in the Final EIS. On all leasehold, easement, and fee simple lands, the least hazardous pesticides such as gel baits and non-lethal traps are used as often as possible. Spray applications are used only as a last resort. Only chemicals registered by the EPA and methods approved for use by the government are used. Work is performed in all instances, by State-certified individuals in accordance with federal, State, local and installation laws, regulations and requirements. Sensitive areas listed on pesticide labels are considered before pest control operations are conducted, and no pesticides are applied directly to wetlands or water areas unless it is specifically approved on the label. Other lands within the Cultural Practices ROI but outside of the jurisdiction of PMRF, include but are not limited to, the Department of Hawaiian Home Lands land, ADC land, and County of Kaua'i land. Pesticide use, and the conditions of soils within this area, are outside the scope of this EIS.	Hazardous Materials and Waste
0109	Luke Sarvis	DLNR, DOFAW	68	B. Listed Species Interactions and Potential Take Under federal law, federal agencies and the U.S. Fish and Wildlife Service ("USFWS") are required to consult with DOFAW; however, Department approval is not necessary for Section 7 consultations under the federal Endangered Species Act ("ESA"). Therefore, the draft components of biological opinions and biological assessments are not always readily available for DOFAW's comment. Some species listed as endangered or threatened under the federal Endangered Species Act are also listed under state law. There are also species listed as threatened or endangered only under state law. An analysis of the impact standard,[1] authorized take, and minimization and mitigation actions for federally listed plants and animals, as reviewed in biological opinions, is essential to DOFAW's evaluation of local and cumulative environmental impacts on each listed species and its habitats. Footnote 1: The impact standard refers to the determination by the USFWS on the federal agency actions to federally listed species under Section 7 of the ESA	Section 7 consultations, as noted in the comment, do not require DOFAW approval. However, as a crucial INRMP partner, DOFAW regularly provides input on the development of management actions for sensitive species, and the Navy works judiciously with the State to ensure federal and State compliance regarding species conservation. The Navy and NASA will continue to coordinate with DOFAW on development, implementation, and analysis of management actions presented in the INRMP. New text has been included under Conservation Management (Section 3.4.1.4 [Biological Resources/Existing Conditions]) of the Final EIS to discuss the role of section 7(a)(1) as it relates to collaboration between DOFAW and the Navy and NASA.	Biological Resources
0109	Luke Sarvis	DLNR, DOFAW	69	The USFWS issued non-jeopardy biological opinions in 2014, 2018, and 2025 for species located on lease and easement lands, including PMRF and KPGO. The 2018 Biological Opinion and 2025 Biological Opinion authorized take of the following	The Navy complies with the following BOs, issued by USFWS, which discuss in detail authorized take of special status wildlife at PMRF (Appendix K of the Final EIS): the 2014 BO for PMRF Base-wide Infrastructure, Operations, and Maintenance, Kaua'i;	Biological Resources

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				species. The authorized take for ‘a‘o is for fifty years and the authorized take for all other species listed is ten years: 1. ‘A‘o or Newell‘s shearwater (*Puffinus newelli*) a. Take from lighting seven fledglings per year, 63 birds in 50 years, b. Take from communication towers 50 adults and subadults per year, 450 birds in 50 years: 7 eggs/chicks per year, 63 eggs/chicks in 50 years. 2. Nēnē or Hawaiian good (*Branta sandvicensis*) a. Take from aircraft strikes, up to four individuals per year. b. Take due to nest destruction, up to three individuals per year and a maximum of seven nests in one year. c. Take due to nest abandonment from disturbance with rocket launching activities, up to one nest per year. d. Take due to nest destruction from rocket launching activities, up to one nest per year. e. Take due to abandonment of the Oxidation Pond re-lining project, up to one nest. f. Take due to vehicle strikes, up to ten individuals per year and a maximum of fifteen individuals in one year. 3. Ae‘o or Hawaiian Stilt (*Himantopus mexicanus knudseni*) a. Take due to aircraft strikes, up to one individual per year. b. Take due to vehicle strikes, up to one individual per year. 4. ‘Alae ‘ula or Hawaiian gallinule (*Gallinula galeata sandvicensis*) a. Take due to aircraft strikes, up to one individual per year. b. Take due to vehicle strikes, up to five individuals per year. c. Take due to incidental capture from predator control, up to three individuals per year. 5. ‘Alae ke‘oke‘o or Hawaiian coot (*Fulica alai*) a. Take due to aircraft strikes, up to one individual per year. b. Take due to vehicle strikes, up to two individuals per year. c. Take due to abandonment of the Oxidation Pond re-lining project, up to one nest. 6. Koloa maoli or Hawaiian duck (*Anas wyvilliana*) a. Take due to aircraft strikes, up to one individual per year. b. Take due to vehicle strikes, up to three individuals per year. c. Take due to abandonment from the Oxidation Pond re-lining project, up to one nest. d. Take due to incidental capture from predator control, up to three individuals per year. 7. ‘Ōpe‘ape‘a or Hawaiian hoary bat (*Lasiurus semotus*) a. Take due to emergency tree trimming, up to two adults and four pups. b. Take due to entanglement with barbed wire, up to four individuals.	the 2018 BO of the USFWS for the Proposed Base-wide Infrastructure, Operations, and Maintenance Activities at PMRF Site, Island of Kaua‘i, Hawai‘i; and the 2025 BO for Base Infrastructure Operations and Maintenance at PMRF Site on Kaua‘i, Hawai‘i. Each BO includes an Incidental Take Statement regarding take amount (maximum), timeframes, adults, eggs, pups/chicks, and nests. These BOs include a full suite of conservation measures, to include avoidance and minimization practices and are dependent upon operational activity on PMRF. Conservation measures contribute to the recovery of the affected special status wildlife species. Take limits and conservation measures addressed in the 2014, 2018, and 2025 PMRF BOs are specifically associated to other federal actions (i.e., air operations and construction activities), and do not necessarily overlap with the ROI for the Proposed Action of this EIS, such as Port Allen. BOs are part of compliance with section 7 of the Endangered Species Act, and are issued by the USFWS for other, ongoing actions at PMRF outside the scope of this Proposed Action. The effects discussed and mitigated for in the BOs are not limited to the State lands that are part of the Proposed Action, and this Proposed Action does not impact the implementation of measures described in the BOs. However, based on input from DLNR, take is discussed in Section 3.4 (Biological Resources) and discussed in further detail in the 2025 PMRF BO (Appendix K) of the Final EIS. The Navy and NASA will continue to coordinate with DOFAW, an important INRMP partner, on development, implementation, and analysis of management actions presented in the INRMP.	
0109	Luke Sarvis	DLNR, DOFAW	70	Navy and NASA should include discussions on the following listed species and mitigation issues in the PMRF and KPGO DEIS: 1. Include a tracking matrix showing the status of each species and the management commitment (e.g., Nēnē hazing frequency, seabird fallout recovery, protocols, seabird nest surveys, etc.).	The status of all listed species at PMRF and KPGO can be found in Table 3.4-2 and Table 3.4-3 in the 2023 PMRF INRMP (Appendix K) of the Final EIS. The Navy and NASA appreciate the DLNR’s continual involvement in annual INRMP updates as a statutory partner. Chapter 4 (Natural Resource Management) of the 2023 PMRF INRMP (Appendix K) of the Final EIS elaborates on management efforts, by species, as well as discussing general natural resource management efforts. NASA coordinates with the Navy to ensure consistency with PMRF’s INRMP practices and procedures. Management Practices, such as promotion and implementation of the Dark Skies Program at PMRF to protect seabirds are discussed in Table 2-7 of the Final EIS. Management Practices are also discussed throughout the 2023 PMRF INRMP (Appendix K) of the Final EIS.	Biological Resources

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0109	Luke Sarvis	DLNR, DOFAW	71	2. Discuss how the Navy and NASA plan to coordinate with DOFAW on data sharing, co-monitoring, and contingency responses (e.g., Nēnē chick banding, species mortality events, etc.).	Geographic and observational data are an integral part of natural resources protection and planning. Natural resources observational and geospatial data relating to PMRF and KPGO are stored in the Natural Resources Program database which is managed by natural resources staff at PMRF. As discussed in Strategy 5 of the 2023 PMRF INRMP, under Section 4.1.6 (Data Collection and Database and Records Management), PMRF coordinates data sharing with natural resources partner agencies such as USFWS, DLNR, and NOAA, as well as coordinates common data collection formatting as possible (Appendix K of the Final EIS). NASA coordinates with the Navy to ensure consistency with PMRF's INRMP practices and procedures.	Biological Resources
0109	Luke Sarvis	DLNR, DOFAW	72	3. PMRF and KPGO DEIS should be updated to describe the authorized take by species in federal biological opinions and associated minimization and mitigation for authorized take, and the status of the take limits and whether mitigation goals have been met. Discuss adaptive management triggered by increased take.	Per DOFAW request, general take information and adaptive management language was included into Section 3.4.1.2 (Biological Resources/Regulatory Setting) of the Final EIS. Minimization and mitigation measures (derived for authorized take) can be found in Section 2.5 (Best Management Practices) of the Final EIS. See response to comment #69 regarding the relationship between the scope of the EIS and related BOs.	Biological Resources
0109	Luke Sarvis	DLNR, DOFAW	73	4. Species-specific recommendations: a. Discuss results from seabird fallout monitoring, scavenger trials, and tower collision studies. b. Clarify whether barbed wire removal or retrofitting has been implemented on the infrastructure. c. Discuss a timeline and funding commitment for testing and implementing bat deterrent measures. d. Avoid clearing vegetation taller than 15 feet during bat pupping season (June 15 to September 15) to avoid disturbing bat pups. e. Discuss nēnē hazing methods, seasonal timing, and decision-making criteria to ensure effective hazing without displacing breeding pairs or families. f. Discuss vehicle collision mitigation strategies for nēnē, including existing speed control measures, signage, and driver training. g. Discuss site-specific locations for waterbird hazing and monitoring, and summarize the long-term monitoring outcomes. Incorporate non-lethal habitat design adjustments to deter waterbird attraction near airfields. h. Volume 4 contains the Final Vegetation Survey Report at PMRF. Table 4-1 and Figure 4-1 show the exact locations of endangered plants. DOFAW requests that this information be redacted from the PMRF and KPGO DEIS due to the risk of theft or vandalism to the species. i. Off-roading in Polihale State Park and adjacent Nohili Dunes should be prohibited as it is within the critical habitat of the endangered plant Ni'ihau Panicgrass (*Panicum niihauense*). The last and only known area to contain these plants in the wild. j. Navy should discuss management, restoration, and mitigation of *P. niihauensis* in the PMRF and KPGO DEIS. k. Volume 4 contains the KPGO Floral Survey Report. Page 17 shows locations of *Psychotria grandiflora*. DOFAW requests that this information be redacted from the PMRF and KPGO DEIS due to the risk of theft or vandalism to the species. We appreciate the opportunity to comment and hope that the concerns raised above will be considered during the Board decision process and in any subsequent real estate transaction. If you have any questions regarding these comments, please contact Sheri Mann, DOFAW Kaua'i Branch Manager, at Sheri.S.Mann@hawaii.gov or 808-274-3436.	Many of the species-specific recommendations that were provided by DOFAW can either be found in related documents, are already discussed in the Final EIS, or are already in consideration. Please see responses to your specific recommendations below: a. A summary of results from biological studies at PMRF will be included in the annual PMRF INRMP update. Final reports are available to Sikes Act partners, such as DOFAW, and results are shared regularly at meetings. b. As stated in the 2025 BO for Base Infrastructure Operations and Maintenance at PMRF Site on Kaua'i, Hawai'i (Appendix K of the Final EIS), proposed construction activities include installation of perimeter fencing without barbed wire. Weekly surveys of barbed wire stretches are conducted for special status wildlife species. c. As stated in the 2023 PMRF INRMP (Appendix K of the Final EIS), the Navy does not currently have plans to implement an experiment on the effectiveness of bat deterrents along fencing at PMRF. A metal tag deterrent study along PMRF barbed wire fence lines is discussed in the 2014 Formal Consultation for PMRF Base-wide Infrastructure, Operations, and Maintenance, Kaua'i in Appendix K of the Final EIS. d. Bat management BMPs, including tree trimming, are discussed in Section 2.5 (Best Management Practices) and Section 3.4 (Biological Resources) of the Final EIS. e. Nēnē Protective Measures, regarding vehicle collision mitigation strategies, are discussed in detail in Section 4.1.4.3 (Nēnē Management) of the 2023 PMRF INRMP (Appendix K) of the Final EIS. f. As described in Section 3.4.2.2.2 (Biological Resources/General Wildlife) of the Final EIS, vehicular strike and collision with structures and guy wires are also a potential risk. In order to reduce the potential strikes, measures such as speed limits and hazing efforts are implemented. Hazing efforts are passive or active control measures used to discourage birds and other wildlife from visiting or utilizing a specific area by creating a less desirable environment. g. Site-specific hazing of special status wildlife species is discussed in Section 2.5 (Best Management Practices) and Section 3.4 (Biological Resources) of the Final EIS. Long-	Biological Resources

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					term monitoring outcomes of special status wildlife species, discussed in the 2023 PMRF INRMP (Appendix K) of the Final EIS, include gaining knowledge of population dynamics and tracking movements as well as management actions to aid in the recovery of special status wildlife species. Non-lethal hazing techniques near roadways and the airfield include removing desirable vegetation and hand clapping. These are discussed in more detail in the 2023 PMRF INRMP and the 2025 BO for Base Infrastructure Operations and Maintenance at PMRF Site on Kaua'i, Hawai'i, both found in Appendix K of the Final EIS. h. Figure 4-1 showing locations of *Panicum niihauense* has been redacted from the PMRF Vegetation Survey Report in Appendix K of the Final EIS. i. The Navy and NASA respect your concerns related to endangered species in the Project Area. However, activities on Polihale State Park, such as off-roading, are outside the scope and jurisdiction of this EIS. j. Management, restoration, and mitigation of *Panicum niihauense* at PMRF are discussed in Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS, as well as the 2023 PMRF INRMP and the 2025 BO for Base Infrastructure Operations and Maintenance at PMRF Site on Kaua'i, Hawai'i in Appendix K of the Final EIS. Conservation measures include habitat restoration via invasive species removal, native outplanting efforts, and monitoring efforts to track population size. k. The KPGO Vegetation Report does not contain a figure that depicts a location of *Psychotria grandiflora*; therefore, no change was made in Appendix K of the Final EIS. The Navy and NASA appreciate DOFAW's participation in the EIS process and thorough review of the Draft EIS.	
0109	Luke Sarvis	DLNR, OCCL	74	The Office of Conservation and Coastal Lands has reviewed the subject EIS in relation to the State leased parcels or portions of the subject parcels noted above that lie within the Conservation District. Submerged land makai of the shoreline also lies within the Conservation District. The OCCL notes the NASA [National Aeronautics and Space Administration] lease for the Geophysical Observatory is a separate lease that is not part of the $1 military lease agreement.	The Navy and NASA note your comment that submerged lands makai of the shoreline lie within the Conservation District. Submerged lands, as described in Section 1.1 (Project Introduction and Overview) of the Final EIS, are not included in the area of analysis for the EIS because the Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy will continue to use this area pursuant to the retained rights in, and powers of regulation and control of, such land by the United States for constitutional purposes as codified in the U.S. Constitution, Article I, Section 8, Clause 3; Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq.; and the Hawai'i Admissions Act, 48 U.S.C. section 5(i). The Navy's use of submerged lands within the ROW area will remain consistent with current usage for navigation and national defense purposes (i.e., for underwater cables supporting at-sea training ranges). The Navy will continue to comply with applicable laws with associated notification requirements to the State as to these submerged lands. If the Navy's use of this area significantly changes, the Navy will take appropriate actions in accordance with NEPA, and inform other stakeholders as appropriate.	Land Use and Access
0109	Luke Sarvis	DLNR, OCCL	75	The OCCL suggests ahupua'a be described as a *land division usually extending from the uplands to the sea*, rather than a subdivision.	Thank you for the suggestion, this edit has been made in Section 1.3.1 (Background/Historic Land Use at PMRF) of the Final EIS.	Land Use and Access
0109	Luke Sarvis	DLNR, OCCL	76	The OCCL suggests Tax Map Keys be utilized in the document to aid the reader in determining the location of the focus area.	To assist the reader in focusing on the area of analysis, County of Kaua'i Tax Map Key parcel numbers have been added to Figures 1-3 and 1-4 in the Final EIS, and to figures in Appendix D of the Final EIS.	Land Use and Access
0109	Luke Sarvis	DLNR, OCCL	77	The Draft EIS states: *"No ground-based training occurs on these leasehold and easement lands". "95% of easements are passively used for encroachment buffers and mission readiness and the remaining 5% are used for access and utilities."*	The Navy and NASA agree these are the Navy's existing uses of leaseholds and easement lands within the Conservation District.	Land Use and Access

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				PMRF The existing uses within the Conservation District include antenna and related structures, missile tracking and surveillance facilities, undeveloped land used for safety zone buffers, drainage management, roadways and access to utilities. This would include: • Track E-1: A portion of Nohili Dune, SIHP Site No 50-30-05-1860, access, ordnance related facilities, missile assembly building, maintenance and storage, and lands for setback • Track E-2: Telecommunications, access, operations and lands for setback • GHA Easement 1 & 2: Ground Hazard Area for missile launches • Lease Parcel A & B-Makaha: Secured entrance, access, data & telecommunications building & facilities, water & fuel tanks, power plant, helicopter landing pad, observation range; • Easement Parcel D & E Roadways • Lease Boresight Tower: telecommunications • Lease Miloli'i Ridge Reflectors 1-3: telecommunications		
0109	Luke Sarvis	DLNR, OCCL	78	Section 3.5.1.6.1 Main Base states, *"All current uses of leasehold and easement lands at Main Base are either lawful uses established before October 1964 or conducted with authorizations received from the Office of Conservation and Coastal Lands."* Our records indicate permits for telecommunication improvements that appear to straddle the USA fee parcel and Track E-2; the radar facilities at Miloli'i ridge within the Pu'u Ka Pele Forest Reserve and minor authorizations for a weather camera, native plant restoration, vehicle barrier and a canopy for a guard station at Makaha Ridge. We have no other records of authorizations for improvements within the Conservation District for other current land uses on leasehold or easement lands. Apart from the above-mentioned authorizations and this draft EIS, the OCCL has no record of other facilities, utilities, or other land uses on State leased land and easements that lie within the Conservation District. The above statement needs to be modified as several land uses were implemented after 1964 that the Department did not review regarding the Conservation District.	The Final EIS has been revised to clarify that the Navy will negotiate with OCCL for authorization of uses on leasehold and easement lands set after 1964 that are not currently established with OCCL in Section 3.5.1.6.1 (Land Use and Access/Main Base) of the Final EIS.	Land Use and Access
0109	Luke Sarvis	DLNR, OCCL	79	In reviewing Conservation District Use Permit (CDUP) KA-1024 for the Radar Related Facilities located upon Miloli'i Ridge, according to the staff submittal to the Board of Land and Natural Resources, the Division of Land Management was concerned about the "*further sprawl of military activities.*" *"Documents filed with the Division of Land Management confirm the leasing of 248 acres of land to the U.S. Navy located primarily on Makaha Ridge, Moreover, the applicant was requested, by letter dated March 15, 1978, to furnish sets of master plans showing existing development, future development, and because of substantial volume of water used from the Koke'e water system, present and future water requirements.*" No response to this request was found in CDUP KA-1024.	The Navy and NASA will coordinate with DLNR-OCCL to prepare a response for the request in the letter dated March 15, 1978.	Land Use and Access
0109	Luke Sarvis	DLNR, OCCL	80	The OCCL requests no ordinance and no material or facilities that may have the potential to damage, degrade or cause harm to land and the natural resources be stored on Conservation District land. No operations that may be hazardous to the land and resources such as launching missiles should be sited on Conservation District lands. The Conservation District is for the purpose of conserving, protecting, and preserving the important natural and cultural resources of the State through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare.	Table D.1-1 in Appendix D of the Final EIS, provides a description of current uses, sizes, and original lease conditions of leaseholds and easement areas at Main Base. One 69.562-acre leased parcel, Tract E-1, is located in the General subzone of the Conservation SLUD and is used for ordnance assembly, maintenance facilities, and material storage. The remainder of the leasehold and easement lands at Main Base are located in the Agricultural SLUD and are zoned a mix of Agricultural and Open Space by the County of Kaua'i. Many current uses of leasehold and easement lands are either lawful uses established before October 1964 or conducted with authorizations received from the OCCL. For any structures constructed after 1964 or not part of current authorizations, the Navy would coordinate with the OCCL for permitted use.	Land Use and Access

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0109	Luke Sarvis	DLNR, OCCL	81	The Draft EIS describes PMRF as a Test and Evaluation (T&E) environment. *"The Navy conducts missile systems tests and has supporting facilities to track and evaluate these tests from the ocean floor to the outer atmosphere."* In addition, *"The Navy, Air Force, Army, Marine Corps, allied foreign forces' RD* [Research Development] *T&E programs, and non-DoD agencies (including NASA and commercial entities), all utilize PMRF's unique capabilities."* The EIS further describes the unique location of broad ocean areas in every direction that *"safely and effectively supports these operations."* But then the EIS states that the ocean right of way is not part of the area analyzed in this EIS and RDT&E activities will not change. In the final EIS, it needs to be clarified why there is no evaluation or proposed mitigation for potential effects of Research Development Test and Evaluation on the ocean resource. Could RDT&E activities contaminate ocean resources? Is the ocean "closed" during launch operations?	As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands; therefore, not all areas the Navy uses for Research Development Test & Evaluation activities are covered in the scope of this EIS. Also see response to comment #74. Navy training and testing operations do not occur on State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS.	Ongoing Activities
0109	Luke Sarvis	DLNR, OCCL	82	Further it is unclear what currently exists in the ocean. Past experiences with material placed in the ocean such as pipes, cables, anchoring systems that have become untethered proved to be detrimental to coral colonies and may cause harm to ocean marine life that may become entangled. The final EIS should contain information about what was placed in the ocean, the condition and status [useful life] of what was placed, mitigation or decommissioning to protect the ocean resources.	See response to comment #81.	Ongoing Activities
0109	Luke Sarvis	DLNR, OCCL	83	The final EIS should discuss the right of transit along shorelines pursuant to HRS Chapter 115. Obstruction of lateral shoreline access shall be avoided or minimized. If obstruction is unavoidable, an alternative lateral access shall be provided unless there is a clearly stated public safety concern.	Access to DoD installations and other related facilities are controlled under DoD Manual 5200.08, Volume 3 Physical Security Program: Access to DoD Installations. Limited access to DoD installations ensures operational security is safeguarded. These circumstances on PMRF are related to Force Protection Condition status, scheduled range operations, and the protection of natural resources, as described in Section 3.5.1 (Land Use and Access/Affected Environment) of the Final EIS. As described in Section 3.5 (Land Use and Access) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. Additionally, as part of the Proposed Action, the Navy is proposing to streamline access through the development of a PMRF Access Management Plan (see Enhanced Engagement-2 in Table 5.2-1 of the Final EIS). As described in Section 3.5 (Land Use and Access) of the Final EIS, the Proposed Action does not change public access at PMRF.	Land Use and Access
0109	Luke Sarvis	DLNR, OCCL	84	The draft notes *"The affected environment is considered the baseline environment without the Proposed Action."* The final EIS should discuss the effects of the existing facilities on the leased lands. For example, by reviewing different views of Miloli'i Ridge and Makaha Ridge, the development of these facilities, its gradual decline and subsidence may be contributing to erosion of the ridges and red dirt run-off in addition to the ungulates. Studies of the existing facilities on State leased lands, the status and useful life of facilities including roads, erosion control, utility corridors and proposed decommissioning or contemplated retention of land uses should be included in the final EIS.	The analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include the presence of Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. The Navy-use impervious surfaces (to include buildings, sidewalks, radar infrastructure, roads) at the Mākaha Ridge parcel make up approximately 3 percent of total leased area on the Ridge. The Navy utilizes numerous BMPs in the areas surrounding those surfaces to help offset erosion at the site. These include the installation of an ungulate exclusion fence around the facilities which will exclude all classes of ungulates (to be completed in 2025/2026), as well as the periodic culling of invasive ungulates within the fenced area. This, combined with the restoration of 6 acres of upland habitat of bare land and outplanting of native species (completed February 2026) allows for sapling growth, revegetation, soil stabilization, and decreased levels of erosion. Grass is also maintained along the perimeter of several	Ongoing Activities

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					impervious structures on the parcel (such as cement slabs) which helps absorb water, stabilize the soil, and prevent rapid runoff. A retaining wall has also been installed. The Navy is installing water catchment basins atop structures on the leasehold lands at Mākaha Ridge to capture stormwater for irrigation and other non-potable uses. These catchment basins also help reroute flow from impervious surfaces to a central catchment location which also helps decrease erosion at the site. Combined implementation of these management strategies decreases erosion, reduces sedimentation, and increases water quality in the streams and nearshore environment immediately downslope of the facility. These actions would be bolstered through the implementation of Enhanced Engagement-7 (Chapter 5, Table 5.2-1 of the Final EIS), which would establish success criteria for erosion management actions at Mākaha Ridge. Additionally, the Navy will continue to consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, as defined in the DoD Unified Facilities Criteria (1-200-02, *High Performance and Sustainable Building Requirements*). Regarding decommissioning, as described in Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS, details for the No Action Alternative are presently unknown and would depend on negotiations. Although details are unknown for the No Action Alternative, the Navy would follow Department of Navy and DoD procedures and guidance as part of any future actions, and NASA would follow their administration's procedures and guidance. The Navy and NASA's current real estate agreements do not include enough specifics for this scenario to include any more detail in the Final EIS. To emphasize the Navy and NASA's commitment to following lawful process under this alternative, text has been added to Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS clarifying that any future actions under this alternative would comply with all applicable State and federal laws. This updated description of the No Action Alternative includes a best faith effort by Navy and NASA to describe what is known for this alternative to meet the requirements for HEPA and NEPA.	
0109	Luke Sarvis	DLNR, OCCL	85	At the end of the lease, existing land uses located at PMRF may be considered non-conforming uses and structures. Pursuant to the Hawai'i Administrative Rules (HAR) §13-5-7 the rules and regulations of the Conservation District shall not prohibit the continuance, or repair and maintenance, of nonconforming land uses and structures as defined in HAR Chapter 13-5. • The repair of structures shall be subject to development standards set forth in this chapter, and other requirements as applicable, including but not limited to a county building permit, shoreline setback, and shoreline certification. • If a nonconforming structure is damaged or destroyed by any means (including voluntary demolition) to an extent of more than fifty per cent of its replacement cost at the time of destruction, it shall not be reconstructed except in conformity with the provisions of this chapter, except as provided under section 13-5-22(P-8). • Repairs or maintenance of a nonconforming structure shall not exceed the size, height, or density of the structure which existed on October 1, 1964, or at the time of its inclusion into the conservation district. • The burden of proof to establish that the land use or structure is legally nonconforming shall be on the applicant.	See response to comment #84 regarding the process described for the No Action Alternative in the Final EIS.	Action Alternatives
0109	Luke Sarvis	DLNR, OCCL	86	At the termination of the existing lease, all proposed new land uses on State land shall comply with HAR Chapter 13-5.	As stated in Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS, pursuant to the terms of the current real estate agreements, at the expiration of the leases and easements, any return of State property would involve complex negotiations and collaboration	Action Alternatives

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					with the State to determine the condition of the returned lands. Any future uses of land in the conservation district proposed by the subsequent lessee or land-owner are beyond the scope of the EIS and would be consistent with all applicable State and federal laws and regulations.	
0109	Luke Sarvis	DLNR, OCCL	87	KPGO The entire area noted as Lease Parcel A, B, C, D, E & F and Easement right-of ways within the Forest Reserves lies within the Conservation District. The site appears to be utilized for data collection. In reviewing State General Lease No. S-3917 dated 8/16/65, the OCCL notes the following statements in the lease: THE LESSOR AND THE GOVERNMENT IN CONSIDERATION OF THE PREMISES, COVENANT AND AGREE AS FOLLOWS: 6. The Government shall have the right, during the existence of this lease to make alterations, attach fixtures, an erect additions, structures or signs in or upon the premises hereby leased, and such fixtures, additions, structures and signs shall be and remain the property of the Government and may be removed or disposed of by the Government prior to the termination of this lease; provided, however, that all such fixtures, additions structures and signs shall be so designed and placed as to detract as little as possible from the natural beauty of the surrounding area, and *plans for such placement or construction, to the extent permitted by security considerations, shall be reviewed by the Lessor prior to such placement or construction.* Further the USE PERMIT issued to the Navy authorized (?) by NASA dated July 21, 2016, also states: X. ENVIRONMENTAL CONDITION, MANAGEMENT, AND COMPLIANCE X.2. General Compliance-The NAVY shall ensure that all operations, activities, equipment, and facilities *are in compliance with all Federal, State of Hawai'i, and local environmental laws, statutes, regulations, and ordinances.* Unless stated in this agreement, the NAVY shall be solely responsible for compliance with aforementioned environmental regulatory requirements including environmental permits. The NAVY shall be considered an independent entity responsible for its own actions for the purposes of environmental compliance and permitting matters…. Exhibit C is missing from the USE PERMIT that is to be reviewed every 4 years and shall remain in effect until the expiration of Exhibit "C". In reviewing and attempting to understand NASA (51 U.S.C.20113(e) authorization, it appears that NASA subleasing Hawai'i State land is inappropriate. The final EIS should clearly explain NASA's authority to issue the Use Permit for the Navy to have exclusive use of facilities at KPGO.	Please see April 22, 1999, DLNR Amendment to General Lease S-3917, Paragraph 21, where "sublease or grant" was stricken. NASA's Use Permit with the Navy is therefore not a sublease, but a federal-to-federal operating agreement consistent with the General Lease and NASA's statutory authority under 51 United States Code section 20113(e). The Use Permit includes requirements for compliance with all federal, State, and local environmental laws. Exhibit C is an administrative matter and does not affect NASA's authority or environmental compliance obligations.	Land Use and Access
0109	Luke Sarvis	DLNR, OCCL	88	The Conservation District rules and regulations were established and initiated on October 1, 1964. The OCCL has no record of authorizations for the Geophysical Observatory. The rules and regulations of the Conservation District noted as Regulation 4 at that time did have a land use that could have been applied for under Section 2. B. Permitted Uses; (1) (d) Public and private utility and similar activities to include areas required for the development, generation, storage, distribution, transmission, receiving, boosting, repeating, maintenance, repair, alteration and related processing of electricity, radio, radar, television, telephone, telegraph, water, sewage, fuel and other similar commodities. Under current rules, the Geophysical Observatory appears to be an identified land use pursuant to HAR §13-5-22 P-1 DATA COLLECTION (D-1) Data collection, research, education and resource evaluation that involves permanent facilities or structures larger than 500-ft2 or a land use causing significant ground disturbance or impact to a natural resource.	KPGO (originally the Kōke'e Instrumentation Station) was established prior to August 1960 to support Project Mercury capsule reentry tracking. As such, the facility predates the 1964 Conservation District rules. Under current HAR section 13-5-22, the Geophysical Observatory is an identified land use (P-1 Data Collection).	Land Use and Access

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0109	Luke Sarvis	DLNR, OCCL	89	Regarding both the PMRF and KPGO, the EIS states: "*the wastewater system at Mākaha Ridge is comprised of septic tanks and cesspools,"* and *"Cesspools are the primary method for disposal of wastewater…and are presently utilized at all KPGO sites."* Cesspools are considered substandard systems that do not treat wastewater, leading to potential ground water contamination and public health risks. The federal ban on large capacity cesspools was enacted in 2000, and the operation of existing systems was prohibited by the EPA by 2005. The final EIS should discuss compliance with this federal mandate. Should there be any questions regarding OCCL comments, contact Tiger Mills of the Office of Conservation and Coastal Lands at (808) 587-0382 or at kimberly.mills@hawaii.gov.	The Navy and NASA note your concerns regarding the Mākaha Ridge and KPGO use of cesspools and the EPA and Hawai'i State mandates for removal. The Navy and NASA expect these requirements to be outlined in the applicable lease/easement agreements. The conditions of the lease and any necessary projects that result from these conditions will be addressed at that time and will require separate environmental analysis. The Navy and NASA will coordinate the closure of the cesspools and the construction of new permitted septic systems prior to 2050, consistent with the requirements of Act 127 and applicable federal and State health and environmental regulations, as required. The Navy and NASA appreciate OCCL's participation in the EIS process and thorough review of the Draft EIS.	Utilities
0109	Luke Sarvis	DLNR, SHPD	90	The State Historic Preservation Division reviewed the Draft Environmental Impact Statement (DEIS) for the proposed real estate agreements with the United States (U.S.) Navy and the National Aeronautics and Space Administration (NASA) Proposed Real Estate Agreements with the State of Hawai'i for the Pacific Missile Range Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO), located at the above-referenced TMKs on the islands of Kaua'i. The State Historic Preservation Division (SHPD) has reviewed the DEIS and provides the following comments: The U.S. Navy proposes to retain the use of 8,172 acres of state lands (684 acres of leaseholds; 7,488 acres of easement lands) on Kaua'i, Hawai'i, in support of continued and ongoing military training, testing, and facility operations at the Pacific Missile Range Facility (PMRF). The National Aeronautics and Space Administration (NASA) proposes to retain the use of 23 acres of state lands (16 acres of leaseholds; 7 acres of easement lands) on Kaua'i in support of maintaining data collection efforts of global significance at Kōke'e Park Geophysical Observatory (KPGO). The Proposed Action includes existing operations that occur on leasehold and easement lands. The DEIS is unclear about the proposed mitigation measures for eight significant archaeological sites identified in the Archaeological Inventory Survey (AIS). As required under HRS Chapter 6E and HAR §11-200.1-24(p), the DEIS must describe efforts to avoid, minimize, and mitigate adverse effects on historic and cultural resources. The DEIS and final EIS should include proposed mitigation strategies for significant archaeological sites.	Section 3.2.2 (Archaeological and Architectural Resources/Environmental Consequences) summarizes the effects on historic properties from the Proposed Action, and the AIS reports describe the analysis in more detail. The agencies' assessment is that the Proposed Action will not result in adverse effects [36 CFR 800.5(a)(1)] or harmful effects [HAR 13-275-7(a)(2)] to historic properties. Thus, there are no adverse effects to historic properties that require mitigation.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR, SHPD	91	The DEIS and final EIS should include clear documentation of SHPD concurrence regarding the significance of all evaluated sites, especially those considered significant under HRS Chapter 6E in accordance with HRS §6E-8 and HAR Chapters 13-275 and 13-284. Please provide a summary of HRS §6E-8 consultation and any previous SHPD determinations to be included in the DEIS and final EIS.	The HRS 6E-8 review is anticipated to be completed by the time the Final EIS has been published.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR, SHPD	92	SHPD further recommends that the DEIS and final EIS comply with all applicable laws and rules, including Hawai'i Revised Statutes Chapter 343 - Hawai'i Environmental Policy Act, Hawai'i Administrative Rules (HAR) Chapter 11-200.1 - Environmental Impact Statement Rules, and HAR §11-200-25, which pertains to the National Environmental Policy Act. This also includes the 1997 Guidelines for Assessing Cultural Impacts adopted by the Environmental Council. SHPD further recommends early, sustained, and respectful collaboration and consultation with Native Hawaiian Organizations, Native Hawaiian cultural practitioners, lineal descendants, and community stakeholders for the development of the DEIS and final EIS in alignment with the 2023 Department of Interior's Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research, 301 DM 7.	Section 1.6 (Relevant Laws and Regulations) of the Final EIS describes the applicable federal and State of Hawai'i laws, statutes, regulations, and policies applicable to implementation of the Proposed Action. A description of the Proposed Action's consistency with these laws, policies, and regulations, as well as the names of regulatory agencies responsible for their implementation, is found in Appendix E. Specific application of relevant laws, statutes, regulations, and policies are described within each section of the Final EIS. The U.S. Department of the Interior's 301 DM 7 applies to the Department of the Interior and its component bureaus and offices; please see Section 3.3.1.2 (Cultural Practices/Regulatory Setting) of the Final EIS for a list of applicable federal and State guidance for Navy and NASA consultation with Native Hawaiian Organizations, Native Hawaiian cultural practitioners, lineal descendants, and community stakeholders.	Archaeological and Architectural Resources
0109	Luke Sarvis	DLNR, SHPD	93	SHPD requests to review and comment on any construction or land-altering activities in alignment with HRS Chapter 6E and HAR §13-275.	Comment noted. The Navy and NASA will coordinate with SHPD under HRS 6E and HAR section 13-275 for future construction or land-altering activities.	Archaeological and Architectural Resources

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				Please contact Dr. Susan Lebo, Archaeology Branch Chief, at susan.a.lebo@hawaii.gov or (808)692-8019 for matters regarding archaeological resources. Please contact Kauanoe Hoomanawanui, Kaua'i Burial Sites Specialist, at kauanoe.m.hoomanawanui@hawaii.gov or (808)896-0475 for matters regarding burial sites. If you have any questions about the contents of this letter, please contact Christopher "Ikaika" Nakahashi, SHPD Cultural Historian, at chris.nakahashi@hawaii.gov or (808)243-4600.	The Navy and NASA appreciate SHPD's participation in the EIS process and thorough review of the Draft EIS.	
0109	Luke Sarvis	DLNR, State Parks	94	Thank you for the opportunity to comment on behalf of the Department of Land and Natural Resources, State Parks Division (DLNR-DSP) on the *Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF) and Kōke'e Park Geophysical Observatory (KPGO) Real Estate, Kaua'i. Hawai'i.* DLNR-DSP has reviewed this document, and the comments of DLNR Land Division. We agree with many of the comments made by Land Division and believe that their points address our substantive comments on the DEIS. The PMRF and KPGO have been our long-term neighbors and partnering agencies at these locations. On-going operations over the last several decades has resulted in some informal agreements between DSP, the Navy, and NASA. DSP would like to take the opportunity of the comment period and this EIS process to document these issues, and propose potential solutions.	The Navy and NASA thank you for your participation in the EIS process.	EIS Process
0109	Luke Sarvis	DLNR, State Parks	95	DSP would like to request the following things from the U.S. Federal Government: • Consolidation of leases and easements at KPGO to one lease-hold parcel • retention and formalization of rights to access and use the helicopter landing zone at KPGO • right of refusal for the excess structures at KPGO, • upgrade non-compliant large capacity cesspools at KPGO to modern septic systems. • a trade of water resources, and • affirmation the State of Hawai'i retains the right to build structures on within the General Hazards Area (GHA) easement of PMRF.	NASA only holds one lease with the State (#S-3917). DSP's requests regarding lease consolidation, access/use rights, right of refusal, water resources, and Ground Hazard Area easement are noted but are property/real estate matters to be addressed through lease negotiations with the State. NASA is coordinating the closure of cesspools and installation of permitted septic systems prior to the new lease. Wastewater handling will comply with health and environmental regulations prior to lease, sale, or transfer.	Action Alternatives
0109	Luke Sarvis	DLNR, State Parks	96	According to the DEIS, the KPGO consists of several lease-hold properties connected by transportation easements. These facilities are enclosed with a fence and effectively operate as a single installation. This situation is a little difficult to track under so many independent agreements. DLNR - SP requests that, should alternative 1 move forward, that these agreements be consolidated as one lease.	NASA only holds one lease with the State (#S-3917).	Action Alternatives
0109	Luke Sarvis	DLNR, State Parks	97	At the top of the KPGO, DLNR-SP accesses and uses an area as a helicopter landing zone. This helicopter LZ is of critical importance in our operations related to management of Napali Coast State Wilderness Park. Regardless of what kind of agreement is settled, at the end of this process, DLNR - DSP would like to retain rights to access and use this helicopter landing zone in perpetuity.	NASA does not have the authority to grant perpetual access rights. All access and use arrangements for the helicopter landing zone will be addressed in the lease or use agreement. NASA's intent is to continue cooperating with State Parks regarding their operational needs.	Action Alternatives
0109	Luke Sarvis	DLNR, State Parks	98	The DEIS reports that unused structures will be demolished. DLNR - SP would like to assert a right of refusal. DLNR - SP would like to retain some of the structures that are not being used and re-purpose them for park use. Specifically, we would like to acquire structures at Site A: the former MK-74 Detecting and Ranging (RADAR) site on Faye Road, for use as a State Parks base yard.	The Final EIS analyzes demolition of all structures to meet NEPA requirements to assess the maximum reasonable adverse impact (extreme case scenario). This ensures potential worst-case effects are disclosed. If the State pursues retention of specific structures, coordination can occur during property disposition/transfer. As described in the Final EIS, Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative), any retention of infrastructure would be the subject of negotiations between the State, Navy, and NASA.	Action Alternatives
0109	Luke Sarvis	DLNR, State Parks	99	Per the comments made by Land Division, the facilities at KPGO use large capacity cesspools as their sewer infrastructure. DLNR - SP would like to reiterate that these facilities must be upgraded to health department compliant septic systems prior to any new lease agreements or land sales. State Parks would also like to assert that, even with the right of refusal, we would like the MK-74 RADAR site to be upgraded to septic prior to transfer.	See response to comment #89.	Action Alternatives

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0109	Luke Sarvis	DLNR, State Parks	100	The State of Hawai'i provides water to KPGO and the Makaha Ridge installation via the Kōke'e State Park water system. DLNR-SP provides up to up to hundreds of thousands of gallons of water to the federal government at no cost. The reason we have not billed for this use is that the water system is in a remote and rugged location, so metering of this use is very logistically complicated. DLNR-SP would like to address this issue with the following proposal: that no change be made to this arrangement, but the U.S. Navy should provide DLNR-SP with water for the southern portion of Polihale State Park, via the Mana Water System. It can be extended from the northern portion of the PMRF to the location of Queens Pond at Polihale. DLNR - SP has a long-range vision to develop out the entrance of Polihale State Park at the area known locally as Queen's Bath. We intend to install a new comfort station, and potentially a small interpretive ranger station. The water requested from PMRF will support these proposed facilities.	The Navy and NASA note State Park's request for terms and conditions in new real estate agreements that include an arrangement where State Parks continues to provide water to KPGO and Mākaha Ridge in exchange for Navy providing water to State Parks at the southern portion of Polihale State Park via the Mānā Water System through an extension from the northern portion of PMRF to the Queens Pond at Polihale. Terms and conditions of new real estate agreements would be identified during negotiations. Text has been added to Section 2.3.1 (Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) of the Final EIS to clarify this.	Action Alternatives
0109	Luke Sarvis	DLNR, State Parks	101	Under the current agreements, the U.S. Navy retains an easement for the Ground Hazard Area (GHS). To our understanding, the GHA easement grants the NAVY the authority to clear the area during a missile launch in the event of a misfire. DLNR - SP would like to request formal acknowledgement that construction of such structures would not be in violation of this easement. We are willing to create protocols that would allow the Navy to continue to close the GHA, including newly-proposed structures, during missile launches. Mahalo Piha for your time. Should you have any questions or concerns please contact State Parks Planner Carl Sholin at carl.e.sholin@hawaii.gov, (808)636-8430.	The Navy notes State Parks' request for building structures in the Ground Hazard Area. The Navy recommends that this request be made to the PMRF Real Estate Office, and any discussions would involve State Parks, DLNR, and PMRF. The Navy would appreciate working with State Parks to develop protocols consistent with those described in Land Use and Access (Section 3.5) and Public Health and Safety (Section 3.9) of the Final EIS in regard to any new State Parks construction. The Navy and NASA appreciate DLNR-State Park's participation in the EIS process and thorough review of the Draft EIS.	Action Alternatives
0110	Sequoya		1	Aloha and thank you for the opportunity to attend your informational meetings and your attention to our public comments. I strongly support the Navy NOT purchasing the land under consideration. I support renewing the lease(s) at fair market value for the land that the Navy and NASA currently control. I feel this will best serve the public and island residents in, among other ways, allowing for long-term oversight for how the land is treated, while allowing the Navy and NASA to continue on with these projects that they deem important. I do appreciate all the ways that PMRF gives to the community, but really support them in cleaning up after themselves. Among other things, with the pressure on our landfill, we need PMRF to make a sincere effort on reducing waste. And after the Red Hill debacle on O'ahu, I would want to see attention going toward an analysis of any fuel tanks, etc, and proper maintenance to avoid environmental contamination. Thank you for your consideration. Sincerely, Sequoya Kalaheo Hawai'i	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process and recognition of the Navy and NASA's activities as valuable to the community and the land. The Navy and NASA note your support of Alternative 1. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Outreach) of the Final EIS also describes the Navy's coordination at PMRF with the community. Discussions regarding waste management, including safe fuel storage, may be found in Hazardous Materials and Waste (Section 3.12) of the Final EIS.	General Support
0111	Kamakana C. Ferreira	OHA	1	Aloha, Attached is an Office of Hawaiian Affairs (OHA) comment letter on the June 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kauaʻi. Naval Facilities Engineering Systems Command has prepared this DEISon behalf of the Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) as required by Hawaiʻi Revised Statutes (HRS) 343 and the National Environmental Protection Act (NEPA). These comments have also been submitted via the online comment portal (https://pmrf-kpgo-eis.com/comments/). A hardcopy of the letter will be mailed out to you shortly. Please let me know if you have any questions. Mahalo,	The Navy and NASA thank the Office of Hawaiian Affairs (OHA) for their comments and appreciate their participation in the EIS process.	EIS Process

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				Kamakana C. Ferreira, M.A. Compliance Archaeologist Office of Hawaiian Affairs 560 N. Nimitz Hwy Honolulu, Hi. 96817 (808)594-0227		
0111	Kamakana C. Ferreira	OHA	2	Aloha e Ms. Ling: The Office of Hawaiian Affairs (OHA) is in receipt of the June 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kauaʻi. The Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) published this DEIS for public comment as required by the Hawaiʻi Environmental Policy Act (HEPA), Hawaiʻi Revised Statutes (HRS) Chapter 343 and the National Environmental Protection Act (NEPA), 42 U.S.C.A. § 4321 *et seq.* As detailed in the DEIS, existing real estate agreements are set to expire between 2027 and 2030, and the DON is proposing to retain the use of 8,172 acres of State lands to support continued military training, testing, and facility operations at PMRF and Kaʻula Island. NASA also proposes to retain the use of 23 acres of State lands at Kokeʻe in support of continued operations, including measurements of the Earth's rotation and local land motion at KPGO. Established pursuant to the terms of Section 5 of the Admissions Act, Pub. L. No. 86–3, 73 Stat. 4, 6 (1959), and Article XII, sections 4, 5, and 6 of the Hawaiʻi State Constitution, OHA serves as a semiautonomous agency and trust vehicle for the betterment of the conditions of native Hawaiians and Hawaiians. OHA's nine elected trustees exercise their powers "to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiians, including all income and proceeds from that pro rata portion of the [public lands] trust."[1] By statute, OHA is mandated to: (1) serve as principal public agency in the State of Hawaiʻi responsible for the performance, development and coordination of programs and activities relating to native Hawaiians and Hawaiians; (2) assess the policies and practices of other agencies impacting native Hawaiians and Hawaiians; and (3) conduct advocacy efforts for native Hawaiians and Hawaiians.[2] Footnote 1: Haw. Const. Art. XIII, § 6. Footnote 2: HARS § 10-3.	The Navy and NASA thank the OHA for their comments and appreciate their participation. The Navy and NASA appreciate the clear and concise explanation of OHA's interest in the public trust, role within the government, and role as advocates for Native Hawaiians and Hawaiians.	Cultural Practices
0111	Kamakana C. Ferreira	OHA	3	Consistent with its constitutional and statutory duties to advocate for Native Hawaiians and Hawaiians, and preservation of the public land trust corpus, OHA respectfully provides the following comments for the DON's and NASA's consideration in fulfilling their legal duties under HEPA and NEPA: **Public Land Trust Considerations** The DON's current real estate agreements with the Department of Land and Natural Resources (DLNR) include 684 acres of leasehold lands and 7,664 acres of easement lands, for a total of 8,348 acres on the island of Kauaʻi. Current leases and easements are used for passive encroachment buffers, as well as for mission readiness, access, and utilities at the following five general locations: Main Base, Kamokalā Ridge, Mānā Water Well, Miloliʻi Ridge, and Mākaha Ridge. NASA's current real estate agreements with DLNR include 16 acres of leaseholds and 7 acres of easement lands, for a total of 23 acres. All of these lands are former crown and government lands of the Hawaiian Kingdom. *See* DEIS at 3-92. OHA has a paramount interest in preserving the corpus of the former crown and government lands of the Hawaiian kingdom until a resolution of the Native Hawaiian people's unrelinquished claims to these lands, including sovereignty and governance	The Navy and NASA appreciate the clear and concise explanation of OHA's interest in preserving the corpus of the ceded lands, including those that are part of the Project Area, through the exercise of reasonable skill and care in their management. The Final EIS is intended to aid the State and the Navy and NASA in such management.	Cultural Practices

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				over a land base. The state and federal governments have repeatedly recognized the obligation to preserve and protect the State's public land trust as "the foundation (or starting point) for reconciliation" with the Native Hawaiian people for historic wrongs.[3] [T]he Apology Resolution and . . . related state legislation clearly contemplate that native Hawaiians (1) "never directly relinquished their claims to... their national lands to the United States," and (2) "are determined to preserve, develop and transmit to future generations their ancestral territory." As such, we believe and, therefore, hold that the Apology Resolution and related state legislation… give rise to the State's fiduciary duty to preserve the corpus of the public lands trust, specifically, the ceded lands, until such time as the unrelinquished claims of the native Hawaiians have been resolved. Such duty is consistent with the State's "obligation to use reasonable skill and care" in managing the public lands trust and the Ahuna court's declaration that the State's conduct "should... be judged by the most exacting fiduciary standards." *Id.* at 905 (internal citations omitted) Footnote 3: *Office of Hawaiian Affairs. v. Hous. & Cmty. Dev. Corp*., 177 P.3d 884, 902 (Haw. 2008), *rev'd and remanded sub nom. Hawai'i v. Office of Hawaiian Affairs*, 556 U.S. 163 (2009) (reversed on other grounds).		
0111	Kamakana C. Ferreira	OHA	4	Given OHA's vested interest in the public lands trust and fiduciary duties to our beneficiaries, OHA's June 7, 2024, comment letter on the EISPN, requested that OHA be consulted as part of the lease renewal process along with representatives for the State of Hawai'i. While the DEIS itself is not responsive to this request, we understand from the July 24, 2025, discussion between the OHA Board of Trustees and representatives from the DON and NASA that OHA can expect a formal response to our request for consultation in the near future. <u>We respectfully request that the DON and NASA share this response in the FEIS as part of the records of communications relevant to lease renewal. We further recommend that Section 3.5 include a summary of OHA's public land trust responsibilities and oversight role.</u>	Section 1.7.4 (Public and Agency Participation and Intergovernmental Coordination/Intergovernmental Coordination) of the Final EIS describes intergovernmental coordination, including consultation with OHA. A summary of OHA's role and interest has been added in Section 3.5.1.2 (Land Use and Access/Regulatory Setting) of the Final EIS. Formal consultation with OHA is summarized in Section 1.7.4 (Public and Agency Participation and Intergovernmental Coordination/Intergovernmental Coordination) of the Final EIS. A summary of OHA's public land trust responsibilities and oversight role has been added in Section 3.5.1.2 (Land Use and Access/Regulatory Setting) of the Final EIS.	Cultural Practices
0111	Kamakana C. Ferreira	OHA	5	An additional issue of paramount concern to OHA given our constitutional role and duties, as stated in our June 7, 2024, letter, is the status of cleanup and monitoring activities at PMRF given the known harm that military activities can cause. An essential component of the State's duty to protect and preserve trust land is an obligation to reasonably monitor a third party's use of the property.[4] It is unclear, however, whether the State has been actively conducting periodic monitoring and site visits of the lease areas, as necessary to preserve the public lands trust for eventual return to the State of Hawai'i or the Native Hawaiian people. Consistent with this duty, the State should not entertain lease renewal prior to completing an independent assessment of the DON and Navy's compliance with existing lease terms, including those related to cleanup.[5] Unfortunately, the DEIS does not include any information on periodic monitoring done by the State or whether such monitoring has occurred. Rather, in response to our comment, the DEIS states that "solicitation of past DLNR monitoring and inspection records at PMRF should be made directly to the DLNR." Again, <u>we recommend the DEIS: (1) disclose whether the State has conducted any inspections to date; and (2) disclose any concerns noted by the State as a result of such independent inspection or inspections. The public, in turn, would then be informed and able to comment via the HEPA process on the State's compliance with its mandatory trust duties and how any identified problems are being addressed and remedied.</u> Footnote 4: *See Ching v. Case*, 145 Haw. 148, 176-77, 449 P.3d 1146, 1174-75 (2019). Footnote 5: While Ka'ula Island or Ka'ula Rock was formally transferred to the federal government in 1924, surrounding state waters and lands have been impacted by	Thank you for your recommendations. The Navy and NASA understand that OHA is asking about Department of Land and Natural Resources (DLNR's) history of inspections of the PMRF and KPGO leased lands. Please note that this EIS analyzed the environmental effects of the proposed real estate agreements that could be enacted in the future, not DLNR's compliance with its trust duties. OHA's concerns about the State's compliance with its trust duties will be communicated to the DLNR by the Navy and NASA. Site inspections would be included in the terms of the lease.	Cultural Practices

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				bombing over the years and should be part of State investigation into the condition of public lands.		
0111	Kamakana C. Ferreira	OHA	6	**Lease Alternatives** In OHA's June 7, 2024, comment letter on the EISPN, we recommended that the DEIS include a meaningful analysis of a shorter-term lease option. OHA believes a shorter-term lease option is a viable option that the DON is obligated to consider pursuant to NEPA, specifically a lease term that is more than 25 years but significantly less than 65 years (e.g., 30 years). A shorter-term lease option would allow the State to evaluate the progress of the lease and to see if conditions are being met before agreeing to any longer lease extension, and thus is more consistent with its duties as articulated in *Ching v. Case*. In review of the DEIS Alternative 1, it appears the DON is still pursuing a long-term option, with "long term" use defined as anything greater than 25 years. However, the DEIS also states it is seeking a new long-term lease for a "similar duration" of time to the existing lease. DEIS at 2-8. Thus, we assume a 65-year lease term is being sought even though this is not explicitly stated in the alternative description. OHA advises that Section 2.3.1 of the DEIS should explicitly quantify what lease term is being pursued, as readers could interpret Alternative 1 to include a lease term as low as 26 years. Moreover, and more importantly, the DON should provide a systematic explanation as to its rationale for dismissing shorter lease terms from further analysis, for example 26 or 30 years.	In response to public comments, the duration of the new real estate agreements under Alternative 1 has been clarified to state these would be for a minimum duration of 25 years and a maximum duration as negotiated with the Department of Land and Natural Resources (DLNR). While the Navy and NASA considered a shorter duration for new real estate agreements (less than 25 years), the rationale for dismissing this alternative from detailed analysis is included in Section 2.4.3 (Alternatives Considered but Not Carried Forward for Detailed Analysis/Shorter Duration Alternative) of the Final EIS. This section explains that this alternative would require more frequent processing of real estate agreements. Additionally federal and State funding would be required to revisit the environmental review documentation and real estate negotiations at more frequent intervals. This alternative would not meet the Proposed Action purpose of securing Department of Defense (DoD) use (for a minimum duration of 25 years to a maximum duration as negotiated with DLNR) of the State land on Kaua'i for the Navy's operational continuity and sustainment of the military readiness mission and NASA's continued operations of KPGO. Therefore, this alternative does not meet the first screening factor (1) maintain longer than 25-year use of land currently used to support DoD and NASA missions on Kaua'i. It does, however, meet screening factors (2) preserve current DoD and NASA operations on Kaua'i; (3) retain existing DoD and NASA infrastructure on Kaua'i; and (4) support DLNR management of public lands and associated environmental and conservation programs on Kaua'i.	Action Alternatives
0111	Kamakana C. Ferreira	OHA	7	Under Alternative 2, "Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds," the DON is proposing to pursue fee simple acquisition of up to 700 acres of state lands. While OHA is opposed to alienation of the ceded lands base whether through long-term lease or fee simple acquisition, OHA notes that retention of state lands, if pursued, must involve more than simply a "fair market value" evaluation, which refers to monetary valuation of the affected lands. Rather, any retention must include mitigating measures appropriate to the level of harm including, but not limited to, for example, a long-term community benefits package for Native Hawaiians including a commitment to assist with governance initiatives, and definitive commitments for long-term restoration activities. Thus, OHA recommends including further detail in Section 2.3.2 of the DEIS regarding the process that will be pursued for this alternative (i.e., timeline, state compliance, land value assessment), and process for community consultation regarding an appropriate land valuation process.	The Navy and NASA appreciate OHA's comment that if fee simple acquisition of the leasehold parcels occur, as described under Alternative 2 in the Final EIS (Section 2.3.3, Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative), that Navy and NASA should identify a long-term community benefits package for Native Hawaiians including a commitment to assist with governance initiatives, and definitive commitments for long-term restoration activities. These commitments would be determined during negotiations between the Navy, NASA, and the State if Alternative 2 were to proceed.	Action Alternatives
0111	Kamakana C. Ferreira	OHA	8	**Historic Preservation Compliance Coordination** In OHA's June 7, 2024, comment letter on the EISPN, we recommended coordination of federal (NHPA Section 106) and state (HRS Chapter 6E) historic preservation review processes with the environmental review process as these processes are essential to identifying historic properties and generating mitigation commitments. In review of the current DEIS, we do see that consultation with SHPD is already ongoing for HRS 6E compliance and that PMRF is operating under a 2012 Programmatic Agreement for NHPA Section 106 compliance that was recently updated in 2024. Further, PMRF has taken the approach to evaluate historic properties as traditional cultural places (TCP) as part of Section 106 considerations where appropriate to ensure a more holistic approach is applied to understanding cultural resources at the installation. Typically, a TCP designation involves consultation with cultural practitioners since it is a property that is significant to a living community because of its association with a community's traditional beliefs, customs, and practices.[6] Footnote 6: See National Park Service National Register Bulletin titled "Identifying,	PMRF is preparing a Traditional Cultural Places (TCP) study and is including consultation with cultural practitioners. This study is anticipated to be completed in 2026.	Archaeological and Architectural Resources

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				Evaluating, and Documenting Traditional Cultural Places", December 5, 2024: https://parkplanning.nps.gov/showFile.cfm?sfid=769780&projectID=10763		
0111	Kamakana C. Ferreira	OHA	9	For state level compliance, the DEIS makes clear that all areas within active leaseholds and easements for utilities and roadways have already been surveyed for archaeological and architectural resources. Figure 3.2-1 provides a map of where surveys took place over the leasehold and easement areas. The most recent archaeological inventory survey (AIS) occurred in 2024 specifically in support of the EIS. As part of the 2024 AIS, eight new sites were identified that were determined to be significant under Criterion D and E. Additionally, the Nohili Dune site, which qualifies as a TCP, has also been found to be significant under Criterion A and E. OHA notes that prior to submitting these significance determinations to SHPD, the Hawai'i Administrative Rules (HAR) 13-275-6(c) require consultation with OHA and Native Hawaiians that may find the site important for Criterion E sites. Thus, as the HRS 6E and TCP processes proceed, OHA looks forward to participating in consultation.	The HRS 6E-8 review is anticipated to be completed by the time the Final EIS has been published. This will include consultation with OHA and Native Hawaiians regarding properties that may have significance under Criterion E.	Archaeological and Architectural Resources
0111	Kamakana C. Ferreira	OHA	10	As part of the Final EIS, OHA recommends providing a clear timetable for HRS 6E completion (inclusive of tentative consultation and HAR 13-275-6 requirements) and a summary of guidance or comments provided by SHPD so far in Section 3.2 of the DEIS. On the federal side, OHA recommends that updates be provided on the designation of the Nohili Dune site as a TCP and what additional actions (i.e., boundary adjustments, National Register updates, access) and consultations are expected to occur as part of this TCP designation.	The HRS 6E-8 review is anticipated to be completed by the time the Final EIS has been published. The results of the review will be incorporated into the Final EIS. As mentioned above, PMRF is preparing a TCP study and is including consultation with cultural practitioners. This study is anticipated to be completed in 2026.	Archaeological and Architectural Resources
0111	Kamakana C. Ferreira	OHA	11	**Cultural Impact Assessment (CIA)** A CIA was prepared for this project by International Archaeology, LLC, in October 2024. A total of 13 people were interviewed as part of the CIA. Most of the concerns presented pertained to access, including requests to open up camping to local families, and to provide access for surfing, fishing, and shoreline activities. Some informants did note the presence of iwi kūpuna as well. To address access, the CIA proposed use of a Morale, Welfare, and Recreation (MWR) Guest Card and coordination with cultural resource management program for cultural access. OHA notes that while the DEIS discusses access for cultural practices, it does not discuss the CIA recommendation for use of a MWR Guest Card. The DEIS only mentions that an MWR Guest Card Program began in 2005, but does not discuss the program in context of recent CIA suggestions or whether the program has been effective in meeting the community's access needs. The CIA further indicates that the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 is the guide for coordinating cultural related access, and that access to TCPs are also pending preparation of a TCP study for TCP sites (i.e., Nohili Dunes). Per Table ES-3, the DEIS states that PMRF is intending to streamline access through development of a PMRF Access Management Plan. The relevant SOP is not quoted in the DEIS to provide additional clarity on the existing access program, nor is any timetable or discussion provided on the proposed PMRF Access Management Plan. Aside from PMRF, access to KPGO is only discussed in a single sentence with a statement that reads "requests for access are made via phone or email to the KPGO Site Manager."	PMRF recognizes that even with the current Morale, Welfare and Recreation (MWR) pass system in place, restrictions on access for cultural practices are an adverse impact. To lessen that impact even more, PMRF will create a process to streamline access for traditional Hawaiian cultural practitioners through the development of a PMRF Access Management Plan (see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS). Details of the plan would be developed after the decision on the leases and easements are made by the BLNR.	Cultural Practices
0111	Kamakana C. Ferreira	OHA	12	While OHA understands that managed access is necessary given the national security interests at stake, OHA supports maximizing public access to the extent feasible and consistent with national security needs. We therefore recommend that Section 3.3.1.4.3 of the DEIS expand its discussion on access to include: 1. the current SOP language that governs access; 2. a timeline for developing access programs for TCPs; 3. a timeline for developing the larger PMRF Access Management Plan; 4. a discussion on the efficacy of the MWR Guest Card Program in light of recent	Thank you for your recommendations. Please see the revisions made in the Final EIS. 1. Standard Operating Procedure #16 language has been added at Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. 2. The TCP study is anticipated to be completed in 2026. This is stated in Section 3.2.1.5 (Archaeological and Architectural Resources/Archaeological and Architectural Resources Studies).	Cultural Practices

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				suggestions made in the 2024 CIA, with consideration of a valid Hawai'i driver's license as an alternative identification method to the MWR card; and 5. a feedback process to gauge whether the access program for cultural practitioners is sufficient to meet community needs and interests in accessing significant cultural sites within the PMRF footprint (both state and federal lands). The latter feedback process is suggested here as it seems based on the 2024 CIA that there are still access concerns. In regards to KPGO access, we recommend development of an actual SOP for consistency with the access process for PMRF.	3. The PMRF Access Management Plan will be developed following the decision by BLNR on the issuance of the real estate agreements. Please see Section 5.2 (Proposed Enhanced Engagements) of the Final EIS for more information. 4. The Access Management Plan is being proposed in response to comments from the public that the MWR Pass process could be improved. Details of the Access Management Plan, including requirements for identification, will be subject to DoD and Navy policies concerning security and force protection. 5. This suggestion has been included as a site-specific conservation goal of the Access Management Program in Enhanced Engagement-2 (Table 5.2-1) in the Final EIS.	
0111	Kamakana C. Ferreira	OHA	13	**Acreage Covered** Per the May 2024 Environmental Impact Statement Preparation Notice (EISPN) for this real estate renewal, the DON initially applied for real estate agreements for 8,348 acres in leasehold areas and easements. However, the DEIS is seeking 8,172 acres total (176 acres less) without any clear explanation for the difference from the EISPN. The difference in acreage is also apparent within the DEIS itself as the DEIS's supporting studies (i.e., cultural impact assessment) contained in the appendices still notate 8,348 acres. The difference appears to be in the amount of easement lands for Kamokalā Ridge, with the DEIS claiming only 179 acres versus 355 acres in the EISPN. Appendix D of the DEIS omits a "restrictive use" easement (ESQD Easement S5604) of Kamokalā Ridge from the EISPN totaling 176.371 acres. OHA also notes that there are differences in the Tax Map Key (TMK) numbers in the EISPN and the DEIS (i.e., TMK (4)1-2-002:012, 013, 015). Notation of such changes and explanations are typically provided so the public can understand differences or revisions in scope as the HRS 343 process proceeds. Thus, OHA recommends an explanation be provided for the change in acreage and Tax Map Keys (TMKs) between the DEIS and EISPN. More importantly, if there is in fact a reduction in acreage (i.e., easement S5604), then the DEIS should explain how those lands will be restored (if being returned to the state) or what their disposition is.	1. The change in acreage corrected an error caused by double counting the acreage of overlapping easements. Explosive Safety Quantity Distance (ESQD) Easement S5604 and Easement 106 of Lease S-5804 are coterminous. Appendix D of the Final EIS has been revised at Table D.1-2 to indicate that these two easements are coterminous. 2. The change in Tax Map Keys (TMKs) was made to correct errors that had included TMK parcels that are not included in the Proposed Action. These included: (4) 1-2-001:001, a coastal parcel north of Polihale State Park misinterpreted as being included in the Mākaha Ridge "A" and "B" parcels. (4) 1-2-002:030, the Kaua'i Island Utility Cooperative (KIUC) Mānā substation excluded from Easement 104. (4) 1-2-002:011, (4) 1-2-002:012, (4) 1-2-002:013, and (4) 1-2-002:015 are federally owned parcels and not part of the proposed leases and easements. (4) 2-1003:018 is located at Port Allen and is not part of the proposed leases and easements. 3. There is no actual reduction in acreage being sought by the Navy and NASA.	EIS Process
0111	Kamakana C. Ferreira	OHA	14	Additionally, it appears to OHA that the requested total acreage amount is being rounded to the nearest whole number in the DEIS. It's clear from Table 1-3 and Appendix D that the actual acreage extends out two to three decimal places, totaling 8,171.516 for PMRF and 22.900 for KPGO. This is a little over half an acre (.584) less than what is being presented for real estate renewal. OHA recommends that the requested leasehold amount be as accurate as possible within the DEIS, unless there is an explanation for any inconsistencies (i.e., if the DON is rounding down for the total acreage requested). Again, if there is any reduction in acreage from what is currently being leased, then the EIS must explain how those lands will be restored (if being returned to the state) or what their disposition is.	The Navy and NASA prioritized readability for the public while presenting acreages in the body of the EIS and, therefore, used rounded whole numbers. As noted in the comment, Appendix D in the Final EIS contains the exact acreages, down to the thousandth of an acre, and these exact numbers will be used during the real estate negotiations between the Navy, NASA, and DLNR. A footnote has been added to the Project Summary and Chapter 1 to clarify this point in the Final EIS.	EIS Process
0111	Kamakana C. Ferreira	OHA	15	**Biological Resources** In OHA's June 7, 2024, comment letter on the EISPN, we recommended early consultation with the United States Fish & Wildlife Service (FWS) and the Division of Forestry and Wildlife (DOFAW) as these entities can offer guidance on federal and state level compliance, respectively. We further emphasized the importance of consultation with cultural practitioners as part of biological surveys and any related conservation actions. On the federal side, the DEIS demonstrates that the DON has been in consultation with the FWS, with the most recent Biological Opinion being issued in 2025. On the state side, the DEIS reports that there is regular coordination with DOFAW personnel on invasive and protected species response efforts, and emerging landscape-scale	The Navy and NASA appreciate Division of Forestry and Wildlife's (DOFAW's) review of these supporting studies. As part of the effort to keep DOFAW informed on the studies that were prepared for this Final EIS, the PMRF Natural Resource Manager contacted Kaua'i Branch Manager at DOFAW expressing the Navy's and NASA interest to share cultural and natural resource work plans in support of this EIS on August 22, 2023. The PMRF Natural Resources Manager sent work plans for the PMRF Wetland Delineation Survey, the KPGO Hoary Bat Survey, the PMRF Fauna Survey, and the PMRF Flora Survey on August 22, 2023, and September 11, 2023. The PMRF Natural Resource Manager sent final reports for the PMRF Flora Survey and the PMRF Wetland Delineation Survey on February 14, 2024 and the PMRF Fauna Survey was sent on June 28, 2024. PMRF sent the Final PMRF Hoary Bat Survey to DOFAW on	Biological Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				issues. However, the discussion on page 3-60 regarding DOFAW is quite short and very general. While OHA does appreciate that the DEIS discusses the ongoing work with DOFAW, the DEIS could better elaborate on these consultations with a summary of provided advice and active collaborations in Section 3.4.1.1.4.	January 24, 2025. NASA sent the final reports for the KPGO Hoary Bat Survey, the KPGO Fauna Survey, and the KPGO Vegetation Survey to DOFAW on August 5, 2025. This language was incorporated into the Final EIS	
0111	Kamakana C. Ferreira	OHA	16	OHA observes on the PMRF website (https://pmrfkauai.com/Natural-and-Cultural-Resources) that PMRF is actively engaged with community partners as part of cleanup efforts and stewardship actions. This is not elaborated upon in Section 3.4 of the DEIS. Some of these activities were explained to OHA when we did a site visit of the installation on March 21, 2025, with PMRF leadership and cultural resources staff. Partnerships with DOFAW were specifically mentioned as an important part of active conservation work. OHA recommends that these community activities as they relate to biological resources be better elaborated upon in Section 3.4 of the DEIS so the public is aware of these programs and all activities occurring on state lands.	The PMRF Kaua'i website (https://pmrfkauai.com/Community-Events) highlights two community events related to biological resources. One event involved a field trip to PMRF with nearly 250 fourth graders from a school on the west side where students learned about the environment, by planting a native plant and food crop plant, and the ways that environmental professionals are working to preserve the native ecosystem. The other event involved PMRF leaders participating in the Kaua'i Regional Science and Engineering Fair with the recognition of Naval Science Award Program recipients. Both of these events are summarized in Table 1-11 of Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS. Section 1.7 (Public and Agency Participation) focuses on public involvement whereas Section 3.4 (Biological Resources) focuses on vegetation, wildlife species, and critical habitats in relationship in the Final EIS.	Biological Resources
0111	Kamakana C. Ferreira	OHA	17	Moreover, while the region of influence (ROI) analyzed in the DEIS is limited to the state lands currently leased by the DON and NASA in support of their respective activities, these lands are of course integral and important for continued operational success. Therefore, while military activities are currently undergoing concurrent environmental review, OHA notes that DON training and test activities at PMRF have significant impacts on marine ecosystems, particularly marine mammals, given the use and testing of Navy sonar from the PMRF area. Even within the defined ROI, the use of bright lights at both DON and NASA facilities can negatively impact breeding, feeding and migration of native seabirds including threatened and endangered species. Given the significance of these cultural/biological resources to OHA's beneficiaries OHA requests that a more complete summary of effects on biological resources be provided in addition to a reference to other relevant federal review documents. *See, e.g.*, DEIS at 3-85. **Closing Remarks** Mahalo for the opportunity to comment. OHA looks forward to seeing our comments taken into consideration as the Final EIS is being prepared. Should you have any questions, please contact OHA's Compliance Advocate, Kaweni Ibarra at (808) 582-0488 or by email at kawenii@oha.org. 'O wau iho nō me ka 'oia 'i'o, Stacy Ferreira Ka Pouhana, Chief Executive Officer	The Navy and NASA agree that, as described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the Navy's use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training. The team agrees, as described in Table 2-4 of the Final EIS, that some, but not all, training and testing activities conducted on federally owned land and in-water are supported by the Navy's infrastructure on State lands. Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS. A comprehensive list of best management practices (BMPs) used for responsible and adaptive management of biological resources are outlined in Table 2.7. These include BMPs related to all special status species that could occur within the Region of Influence (ROI) including, but not limited to, sea turtles, monk seals, special status waterbirds and seabirds, and special status mammals, invertebrates, and plants. Accordingly, a BMP related to effects to endangered seabirds is in place at PMRF and KPGO. As stated in Table 2.7 of the Final EIS, the BMP is deployed so that "whenever feasible, exterior night lighting shall include bat- and bird-friendly design features such as shielded lights (to reduce ambient light), use of motion detectors and/or other automatic controls, and lighting design that uses shields to prevent light from shining upward into the sky." A comprehensive discussion on the presence of biological species within the ROI, and special status species as confirmed by natural resources surveys, is provided in Biological Resources (Section 3.4) of the Final EIS. The Navy and NASA appreciate OHA's participation in the EIS process and thorough review of the Draft EIS.	Biological Resources
0112	Felicia Cowden	Councilmember, Kauai County Council	1	Aloha Kerry and PMRF & KPGO teams, Thank you for all you do for our island and our country. Mahalo for the time taken to meet with me. Please accept my attached testimony.	The Navy and NASA thank you for your comment and your acknowledgement of PMRF and KPGO's efforts.	EIS Process
0112	Felicia Cowden	Councilmember, Kauai County Council	2	Aloha Ms. Wells, In my individual capacity as a Kauai Councilmember, please find below my comments regarding the Pacific Missile Range Facility (PMRF) and the Koke'e Park Geophysical Observatory (KPGO) Draft Environmental Impact Statement (EIS). Kaua'i's PMRF is deeply valued for the contributions it provides for the effectiveness	In response to public comments, the duration of the new real estate agreements under Alternative 1 has been clarified to state these would be for a minimum of 25 years and maximum duration as negotiated with the Department of Land and Natural Resources (DLNR). 65 years is the maximum duration of any current agreements, per State regulations. While the Navy and NASA considered a shorter duration for new	General Support

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				of our Navy missions and the safety of our servicemen and women through effective training. It is also acknowledged that PMRF has a history of being a good partner to the neighboring communities and the State and County government in times of need such as firefighting, among other joint efforts. For these reasons I support Option 1 of a renewed lease, however the continuation of the lease should not be extended beyond reasonable military use of the land for the existing training purposes.	real estate agreements (less than 25 years), the rationale for dismissing this alternative from detailed analysis is included in Section 2.4.3 (Alternatives Considered but Not Carried Forward for Detailed Analysis/Shorter Duration Alternative) of the Final EIS.	
0112	Felicia Cowden	Councilmember, Kauai County Council	3	A challenge in an effective response to the dEIS is the limitation of discussing the draft lease Environmental Impact Statement independent of the essential Environmental Assessments for both the Integrated Natural Resources Management Plan and the PMRF Land Based Training and Testing which were supposed to be completed ahead of this EIS. The Kawaiʻele Pump Operation, the Open Floodable Space, as well as sensitivity to the operations on Kaʻula Island are also relevant though not addressed in this dEIS.	As discussed in Past, Present, and Reasonably Foreseeable Future Actions (Section 4.1.5, Introduction to Analysis) of the Final EIS, the Open Floodable Space Project is a future project, and therefore, the timeline for this project is currently unknown and next steps will be dependent on funding. This area is shown in Figure 3.7-6 in the Final EIS. If more information regarding future phases of the project is available at the time of the publication of the Final EIS, it will be included in the document. Future maintenance of the Kawaiʻele Pump Operation and Maintenance is currently being negotiated; if more information is available at the time that the Final EIS is published, it will also be included in the document. Impacts at Kaʻula Island are outside the jurisdiction and scope of this EIS. Impacts to Kaʻula island are discussed in great detail in the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. Effects to environmental resources analyzed in previous PMRF National Environmental Policy Act (NEPA) documents are presented in Table 1-5 of the Final EIS. The 2025 PMRF Integrated Natural Resources Management Plan (INRMP) Final EA was published in 2025 and all associated management actions are in compliance per the current 2023 PMRF INRMP.	Ongoing Activities
0112	Felicia Cowden	Councilmember, Kauai County Council	4	Two concerns exist for potential reasons why the Mana plain may no longer be ideal for this application as time progresses: 1.) Sea Level Rise and passive flooding is anticipated to increase by up to 3’ by 2100. PMRF has been built on a natural wetland environment which has been drained for roughly a century through a series of pumps and wells lowering the groundwater, for as much as -3 feet, most currently at -.5ft, for the benefit of agriculture use and later for PMRF’s placement. This has created a substantial drying of the land in the general region, negatively impacting the earlier vibrant wetland biosphere of fish, native birds and rich alluvial soils. Historical evidence shows this area could be traveled in watercraft in the rainy season. The State sea-level rise maps demonstrate substantial flood inundation on the base, even to the runway as we move through this century. A slow return of the leased Agribusiness Development Corporation lands to a wetland environment with a crop that tolerates brackish water is ideal, such as the milo tree for timber. Placing the land on a trajectory towards a natural state is ideal for a resilient Kauaʻi.	The approach to analysis in this EIS, as with all National Environmental Policy Act (NEPA)/HEPA (Hawaiʻi Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include existing Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. The Project is described in Sections 2.1 (Proposed Action) and 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS, which includes new real estate agreements and does not include relocation of facilities. Under either of the three alternatives, there would be no change to operations at PMRF that would change the potential for future sea level rise. The Navy and NASA appreciate your consideration of long-term impacts from sea level rise to operations at PMRF and to communities near PMRF. As discussed in Section 3.7.1.4.1.1 (Water Resources/Main Base) of the Final EIS, the Hawaiʻi Department of Land and Natural Resources (DLNR), the County of Kauaʻi, and Agribusiness Development Corporation (ADC) work collaboratively to manage and maintain the network of ditches, canals, drainages, and reservoirs that convey and store water across the Plain, and are supported by the Kekaha Agricultural Association (KAA) and the Navy. The Navy is aware of the unique hydrology of the Mānā Plain and understands the challenges associated with water management while considering all stakeholders. Therefore, the Navy is presenting Enhanced Engagement-5, as shown in Table 5.2-1 (PMRF and KPGO Proposed Enhanced Engagements), which establishes a Navy-DLNR-Department of Hawaiian Home Lands-KAA-ADC-Kauaʻi County working	Action Alternatives

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					group to collaboratively manage water resources in West Kaua'i and discuss long-term use and resiliency. PMRF is also partnering with KAA in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain. The purpose of the projects is to mitigate impacts of sea level rise, protect and restore native forests within the watershed, and improve water quality in the nearshore environment of West Kaua'i. This area is shown in Figure 3.7-6 in the Final EIS.	
0112	Felicia Cowden	Councilmember, Kauai County Council	5	2.) Warfare and Military technology are rapidly evolving to a degree that existing facilities are likely to need substantial changes or may no longer even be necessary. These future elements relative to the critical use of the base go unaddressed. Runway replacements are not adequately considered. Increasingly, cyber warfare, drones and space technology are replacing the technology tested on the base. The lease proposal does not leave a consideration for military use or testing beyond what is currently most pertinent. Were the base to no longer hold its current essential role, returning the land to the people and wetland recovery is ideal, rather than joining a backlog of under-used military installations.	The approach to analysis in this EIS analyzes the potential impacts of the Proposed Action against the existing baseline conditions in the Project Area. Therefore, this EIS does not include an expansive discussion on unknown future challenges or technologies on either leasehold and easement lands or fee simple lands. Where the analysis of potential environmental effects of future actions has not yet been completed, assumptions regarding cumulative effects related to this EIS were made where possible. These are discussed in Cumulative Effects Analysis (Section 4.2). As discussed in Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS, the expiration of the current real estate agreements would result in return of all leasehold and easement property to the State, who would then determine future use of these lands.	Action Alternatives
0112	Felicia Cowden	Councilmember, Kauai County Council	6	Improving infrastructure viability and broader contributions would be valuable. The dEIS reflects in inadequate wastewater treatment facility on the base. Either the description needs to be corrected, or the wastewater treatment facility needs to be brought to current EPA standards. The well and pump descriptions do not appear to be accurately reflected based on recent discussion with Kekaha Ag Association regarding the agricultural water system information. Please check for accuracy. The Market Rate rent references in the dEIS are incomplete. There would be great value to reflect an anticipated range of annual payment for the leased use and how that money would be applied. The west-side of Kauai has significant infrastructure and housing needs. An understanding of an economic land-use relationship would be beneficial in balancing the military installation's impact on the island.	Thank you for your recommendation regarding infrastructure improvement and updates to the Final EIS. Both wastewater treatment plants on Main Base are up to current U.S. Environmental Protection Agency standards, and the plant on the southern end of the base was modernized in 2018. Water Resources (Section 3.7) of the Final EIS has been revised and information on the Mānā Water Well and Kawai'ele Pump Station, and their use within the ROI, has been updated, based on follow-up discussions with the KAA per your suggestion. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value will be determined in collaboration with relevant parties and shareholders when a final action is carried forward, and therefore, an anticipated range of annual payment is not available at this time. Housing is also discussed in Section 3.6 (Socioeconomics), and as a part of the Waimea 400 Master Plan, in Table 4.1-1 (Cumulative Action Evaluation) of the Final EIS.	Water Resources
0112	Felicia Cowden	Councilmember, Kauai County Council	7	Please address the military risk to the community in the increasing political tension in foreign relations. The dEIS does not identify any safety bunkers on the base for the workers, nor for the near vicinity communities of Kekaha or Wailua were there to be any time of airstrike to the base.	In the event of an emergency or attack on PMRF, staff at PMRF and households adjacent to PMRF would be sheltered within decommissioned, empty caves at Kamokalā. This information has been added to Public Health and Safety (Section 3.9) of the Final EIS.	Public Health and Safety
0112	Felicia Cowden	Councilmember, Kauai County Council	8	Committed continuance of shore and mountain access for traditional practices, fishing, hunting, gathering and even recreation needs to be clarified. If you may have any additional questions, please feel free to contact me or Council Services staff at 808-241-4188 or via email to cokcouncil@Kauai.gov. Sincerely, FELICIA COWDEN Councilmember, Kauai County Council	The Navy and NASA are presenting Enhanced Engagements under the action alternatives that propose additional property management protections for the land. Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Land Use and Access
0113	Hope Kallai		1	Aloha e Kerry and EIS Team - Attached please find my comment letter on the PMRF DEIS. Please let me know if it doesn't open correctly. Mahalo, Hope Kallai	Thank you, comment received. Please see responses to your comments below.	EIS Process
0113	Hope Kallai		2	Aloha e Kerry and EIS Team: Please consider my comments in the Final Environmental Impact Statement on PMRF leases and easements. 1. **PMRF RUNWAY REPLACEMENT NOT ADEQUATELY CONSIDERED IN THIS DEIS[1].** In Table ES-1 under Biological Resources on page ES-7, Volume 1, the DEIS states "there	The Navy and NASA agree that, as described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the Navy's use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Approximately 95 percent of the easement lands are passively used for encroachment buffers and	Ongoing Activities

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				would be no change in operations or current activities on the leasehold and easement land" considered in both Alternatives 1 and 2, but the **PMRF Land-Based Training and Testing EA**[2] considers many-fold increases in many operations on base lands and easements. The **PMRF Land Based EA** Pdf page 27 states: The Proposed Action also includes increases in training and testing activities conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight. The **PMRF DEIS** Volume 4, Pdf page 1324[3] states: "Currently, PMRF is limited to the number of landings/takeoff allowed per runway design and life cycle. In 2025, it is anticipated the runway will be replaced to allow for additional flights and accommodate increased aircraft exercises from DoD agencies. Projections for future air operations at PMRF are detailed in Figure 1. This includes a projected increase in usage by C-17 cargo airplanes (from 176 passes per year to a projected 4,320 passes per year) and the ability of 1,440 MV-22 Osprey landings per year at PMRF." "On average, the PMRF airfield accommodated 6,441 takeoff/landings annually between 2014 and 2020." **PMRF DEIS Volume 4,** Pdf page 1325 includes Figure 1 showing doubling of air operations at PMRF (below). This runway upgrade on USA fee simple land allows for significant increases in air operations and military activities, like RIMPAC, held every other year for 5 weeks with 36 nations involved, on fee simple, state leasehold and easement lands as 1 "Activity." Footnote 1: https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of4.pdf Footnote 2: https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf Footnote 3: https://pmrf-kpgo-eis.com/media/5qyjldgz/pmrf-and-kpgo-re-deis-appendices-i-l_volume-4-of-4.pdf	mission readiness, the remaining 5 percent of easement lands are used for access and utility easements. No ground-based training occurs on these leasehold and easement lands." The team agrees, as described in Table 2-4 of the Final EIS, that some, but not all, training and testing activities conducted on federally owned land and in-water are supported by the Navy's infrastructure on State lands. Effects from proposed changes to ongoing activities are analyzed in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA. Additionally, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on marine resources. These documents are available on the EIS website at https://pmrf-kpgo-eis.com/documents. The runway at Barking Sands is located on fee simple land and therefore, impacts from runway operations are not analyzed in this EIS, as the Proposed Action for this EIS involves renewals of leases and easements of PMRF as stated on PDF page 1324 in Appendix K of the Final EIS, the scope of 2025 Biological Opinion includes activities and locations beyond the scope of this Final EIS. For example, activity number 7) use of the driving range and athletic field and activity number 8) construction activities are not within the scope of this Final EIS. This has been clarified in the Final EIS under Regulatory Setting of Biological Resources (Section 3.4.1.2, Regulatory Setting) of the Final EIS.	
0113	Hope Kallai		3	The **PMRF Land-Based Training and Testing Draft EA** still under consideration, includes many new operations over leasehold and easement lands, not included in this real estate EIS which enables them. The impacts of runway replacement should be considered adequately in this DEIS. It is the most important feature of an air base and determines operations. The Proposed Action also includes increases in training and testing activities conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight.	Please see response to comment #1 for a response regarding impacts determined in the 2025 PMRF LBTT Final EA, impacts from operations at the runway on Barking Sands fee simple lands, and operations conducted on leasehold and easement lands. As described in Section 2.1 (Proposed Action) of the Final EIS, the Proposed Action of this EIS is to retain real estate agreements with the State of Hawai'i Department of Land and Natural Resources (DLNR) in support of continued and ongoing military training and testing at PMRF, and does not include an increase in testing and training.	Ongoing Activities
0113	Hope Kallai		4	PMRF Land-Based EA Training and Testing EA includes Table 2.1-1 (above) on Page 30, detailing operations by "activities," which could be hours, days, weeks or months. It is impossible to extrapolate how many landings would occur in "20 activities" of unknown timing, duration or involvement. This EA was supposed to be finalized prior to this EIS. This EA should be considered in a Supplemental Land-Based Operations EIS to this real estate EIS. Runway replacement and the resulting increase in activities are not considered in the EA. 20 Refueling training activities annually are proposed on the Nohili dunes, on Conservation District lands.[4] Footnote 4: https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testingdraft-ea.pdf. PDF Page 29	Your concerns regarding publication of the PMRF LBTT Draft EA and this EIS are noted. The 2024 PMRF LBTT Draft EA was available prior to the publication of the Draft EIS for this Project. The Final EA for PMRF LBTT was completed in September 2025, well in advance of the availability of this Final EIS. This Final EIS does refer to information in the 2025 PMRF LBTT Final EA to describe ongoing activities within the Project Area on leasehold and easement lands, and is included in the HEPA (Hawai'i Revised Statutes [HRS] Chapter 343) cumulative effects analysis in Chapter 4. Table 1-5 of the Final EIS provides a comprehensive list of previous environmental documents reviewed in preparation of this EIS and Table 3.1-4 of the Final EIS presents a comprehensive list of all relevant past environmental documents at PMRF and KPGO and summarizes key issues. Your recommendation to provide a supplemental EIS has been noted.	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0113	Hope Kallai		5	**2. The consideration of "No impact" is based on stale science and past operations.** Because past levels of operations have not had significant impact, it cannot be assumed that these great increases would not. Doubling or tripling training operations as proposed in the 2024 PMRF Land-based Training and Testing EA[5] has great potential for additional impacts to the lands and infrastructure considered in this DEIS. Some activities are quadrupled, some increased from 1 event annually to 30, to be held when humpbacked whales, monk seals and turtles are not present. BASH activities, hazing and relocations will be increased. The 2014 Incidental Take levels established by the USFWS, (Pdf page 1225, Vol. 4) had to be increased due to increasing bird mortality due to vehicle and aircraft collisions, tower and electrical line impacts and botulism outbreaks in the Oxidation Ponds. The 2025 take levels found on Page 1371, Vol 4 are greatly increased, but not enough to reflect the expected increase due to escalating training activities presented in the EA. The 2023 **Integrated Natural Resources Management Plan**[6] states on Pdf page 188 : An avian botulism outbreak occurred in the winter of 2014/2015 at Barking Sands, resulting in the loss of at least 22 birds including 20 Hawaiian Ducks and 2 Hawaiian Coots. Two additional Hawaiian Ducks were captured and rehabilitated by the SOS veterinarians and released. Since then, smaller outbreaks have occurred in the summer as well as winter but have been relatively under control due to increased monitoring efforts. The Incidental Take Permit levels established by USFWS would have been exceeded for 20 Hawaiian Ducks and 2 Hawaiian Coots as there are no Incidental Take considerations for mortalities caused by repeat outbreaks of avian botulism in the Oxidation Ponds. There must be a better option for base wastewater than putting raw sewage in open, unlined ponds so near the ocean, with abundance of impacted endangered waterbirds. Alternative options for wastewater are not considered in this EIS. Botulism outbreak prevention methods were not considered in this EIS, even with takes and annual outbreaks. Footnote 5: https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testingdraft-ea.pdf Footnote 6: https://pacific.navfac.navy.mil/Portals/72/NAVFAC_PACIFIC/Documents/NEPA Info/2024/Final Draft PMRF INRMP December 2023.pdf?ver=BJZPkLdupQezP8EePj3thg==	As described in Section 2.1 of the Final EIS, the Proposed Action of the EIS is to retain real estate agreements with the DLNR in support of continued and ongoing military training and testing at PMRF, and does not include an increase in testing and training. Conclusions made in regard to effects to marine resources in the 2025 PMRF LBTT EA are outside of the jurisdiction of this EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. The oxidation pond at PMRF is located on fee simple land and is not within the Project Area for this EIS (Figure 2-3). However, botulism outbreaks at the oxidation pond is discussed briefly in Section 2.5 (Best Management Practices) of the Final EIS and discussed in great detail in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) and the 2014 and 2025 Biological Opinion (BO) for Base Infrastructure Operations and Maintenance at PMRF Site on Kaua'i, Hawai'i (Appendix K of the Final EIS).	Biological Resources
0113	Hope Kallai		6	**3. The Cultural Impact Assessment was inadequate in community outreach.** The only Native Hawaiians interviewed had generational economic ties to the base. Non-base Hawaiians need to be interviewed and their comments considered. Many Scoping Session cultural practitioner commentors have been impacted greatly by base security measures. These longterm leaseholds have restricted access and cultural practice for 3 generations already. The ongoing impacts to traditional cultural practices and gathering not adequately considered, especially fishing and spiritual practices around Nohili Dunes. An alternative launch site to Nohili should be considered, not on unique sand dunes considered necessary for spiritual recharge and connecting with ancestors, considered Traditional Cultural Property (TCP) in this DEIS. Why this place for missile launches? What alternative was considered? How can the base rent of the lease of this unique property full of iwi kūpuna be determined? There should be a culturally appropriate place to reconnect with ancestors that does not require a base pass, unobtainable to many community members. The impact of missiles and magazines underground at Kamokalā, in a pali surrounded with cultural sites, rock walls, heiau and leina is not appropriately considered in this DEIS or even understood by outsiders.	Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Additional consultation was conducted as a result of public comments. The results of that consultation have been incorporated into the Cultural Impact Assessment (CIA) and the Final EIS. Missile launch activities are discussed in detail in the PMRF LBTT EA, found on the EIS website (https://pmrf-kpgo-eis.com/documents/). A link is provided in Table 1-5 of the Final EIS. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value will be determined in collaboration with relevant parties and shareholders when a final action is carried forward.	Cultural Practices

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					Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes coordination of access to PMRF and KPGO for cultural practices. PMRF will develop an Access Management Plan (Enhanced Engagement -2 in Table 5.2-1 in the Final EIS) to streamline access to traditional Hawaiian cultural practitioners while balancing the needs of public access with PMRF requirements.	
0113	Hope Kallai		7	Part of ancient rock wall on Kamokalā Ridge, by magazine ordnance area. The DEIS conversely states there are 10 underground missile magazines, with Magazines 12 and 13 being constructed in 2012 and 2013 on Tract E-3, Parcel 1 and E-3, Parcel 2 and the Kamolakā Ridge addition. It is unknown what the presence of munitions magazines does to the market value or lease rate of these lands or if more magazines will be necessary for the increased operations. One underground missile silo is intended as evacuation shelter for an unknown number of base residents. Capacity and facilities should be included. DEIS should include evacuation procedures for multi hazard events for all levels of base training events. The continued military presence in a formerly neutral kingdom impacts everybody in Hawaii, not just westside Kauaians. Many testifiers at the public meetings were angry and hurt about being kept out of their traditional lands. There is generational angst abut the base that no EIS can fix	As described in Section 3.6 (Socioeconomics) of the Final EIS, details regarding lease agreements (including Kamokalā Ridge parcels) will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. As discussed in Public Health and Safety (3.9.1.4.2, Kamokalā Ridge) of the Final EIS, decommissioned caves at Kamokalā Ridge would serve as a shelter in the event of an emergency. These caves have the capacity to shelter all PMRF staff and households adjacent to PMRF. Emergency mitigation plans for leased lands are shared with all PMRF staff. As described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the current and proposed use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training and continued operations including measurements of the Earth's rotation and local land motion at KPGO. The Proposed Action does not include any expansion to leasehold or easement lands. The Navy and NASA acknowledge that some Native Hawaiians feel a sense of loss and injustice from continued control of ceded lands by the U.S. Government. Please see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS. The Navy is proposing to develop a process to streamline access to traditional lands through development of a PMRF Access Management Plan that balances public access and PMRF's mission requirements.	Archaeological and Architectural Resources
0113	Hope Kallai		8	**4. EIS does not adequately consider the impacts of passive flooding and sea level rise from climate change.** The only Climate Change impacts considered were coastal not including the re-watering of 3 square miles of former historic marsh from passive flooding predicted to be 2' by 2050. Current pumpage rates will not suffice to dry the swamp, much of which is below sea level. Volume 1 of DEIS includes a 3.2' Sea Level Rise map on page 164, only stating: The following leasehold and easement lands are located within the 3.2-foot sea level rise exposure area scenario for purposes of BLNR's analysis under HEPA: •Leaseholds: •Tract E-1, •Tract E-2, •Tract E-2-A, •Lot 1, Lot 3, •Lot 7, Lot 10, •Lot 13, •Lot A-1, •Lot B; and •Easement Lands: •GHA Easement 1, •GHA Easement 2, Easements 100 – 104, Easement B, •Easements B-1 – B-6, Easement D, •Easement F, •Easement G Pt 1, Easement G Pt 2, Easement H Consideration of long term leases in a tsunami zone requiring the ongoing draining of swamp land deserves way more consideration than just a mere list of impacted lease lands and an orange colored map to show sea level rise, usually shown in blue. There is no operational information included for each leasehold, which is considered in the uncompleted EA. There is inadequate consideration for the hydrology of Mānā Plain and the series of 26 miles of ditches transporting water through the drained swamp in **3.7 Water Resources**, pdf page 274, Vol.1. PMRF and dryland agriculture in the Mānā Plain are dependent on the continued de-watering of the 1,700 acre Mānā Swamp.	In order to support analysis for the BLNR as may be necessary under HEPA (HRS Chapter 343), the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. Based on your comment, Figure 3.1-1 in the Final EIS has been revised, and sea level rise symbology has been changed from orange to blue. Under all three alternatives proposed in the EIS, there would be no change to the topography of ROI, and portions of the leasehold and easement areas would continue to be susceptible to tsunamis. PMRF has a tsunami evacuation plan which meets the recommended elevation and distance requirements for tsunami evacuation routes. The continued pumping at Kawai'ele helps maintain viable agricultural land. Under the No Action Alternative, the Navy could choose to cease pumping at Kawai'ele which could have impacts to agricultural lands. Under the restrictive use easement, Department of Land and Natural Resources (DLNR) and Agribusiness Development Corporation (ADC) manage and control these lands including activities involving agriculture, water resource management, and public safety from tsunamis and other natural disasters. The restrictive use easement allows for limited activities on	Water Resources

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					leasehold and easement lands which are described in the Affected Environments sections in Chapter 3 of the Final EIS. In consideration of the hydrology of the Mānā Plain, PMRF and Kekaha Agricultural Association (KAA) are partnering in an initiative supported by the Department of Defense's (DoD's) Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain. The purpose of the project is to mitigate impacts of sea level rise, protect and restore native forests within the watershed, and improve water quality in the nearshore environment of West Kaua'i. This area is shown in Figure 3.7-6 in the Final EIS.	
0113	Hope Kallai		9	The Mānā Well (TMK 412002028, Water Lot 12, a 0.264 acre Ag zoned property, Market Value $224,400, including access road, Sixth Amendment to General Lease No. S-3852), (Amendment 6), CSF 24336) providing potable drinking water to the base, is under leasehold consideration. An estimate for the lease rent for this valuable well site is not included. The only alternatives (purchase or no lease) did not consider the well operation being taken over by any other leaseholder, like DHHL or KAA or ADC. The DEIS does not consider the impacts of no pumping. How much of the Mānā Plain would rewater and how deep? DEIS does not mention cost of pumped groundwater or if the CWRM has established a pumpage limit. Estimates included in the DEIS are the Mānā Well pumps 2 MGD, the main base using about ~.5 MGD. The remainder ~1.5 MGD needs to be explained. In the **2014 FEA Mānā Plain Wetland Restoration Project**[7] includes consideration of a 2012 water budget analysis completed by Kamman Hydrology & Engineering, Inc. A salt budget was also performed. The wetland basins created to form Kawai'ele Waterbird Sanctuary are supplied with groundwater, except basin N3, which uses only ditch water and N13 which uses a mixture of ditch and groundwater. The groundwater comes from an artesian well on ADC state property at about 30-35 gpm. This contribution of artesian well water is not considered in the PMRF DEIS from this well and any other unused, now artesian, wells in the former swamp. It is unknown if the water budget was updated for this re-established 100 acre wetland and if a water budget will be updated again after completion of the proposed 200 acre Open Floodable Space REPI project. Footnote 7: https://files.hawaii.gov/dbedt/erp/EA_EIS_Library/2014-02-08-KA-FEA-Mana-Plain-Wetland-Restoration-Project.pdf	Water resources, and associated activities and impacts, on the Mānā Plain are discussed throughout Section 3.7 (Water Resources) and Section 3.8 (Utilities) of the Final EIS. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value for the Mānā Well parcel, and all other parcels, will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. As discussed Section 3.7 (Water Resources) in the Final EIS, the loss of pumping at the Kawai'ele Pump Station would cause the surface water and groundwater levels in the Mānā Plain to rise. Based on best available information regarding hydrology of the Mānā Plain, it is estimated that without the use of Kawai'ele Pump Station, water levels on the Plain would revert to pre-1920s level. During wet periods, ponds no more than 3–4 feet deep would accumulate in lower-lying areas of Plain, and would contract only through evaporation or long-term seepage. As stated in Section 3.8.1.4.3 (Utilities/Mānā Water Well) of the Final EIS, the current average pumping rate at Mānā Water Well is approximately 1,400 gallons per minute (gpm), or approximately 2 million gallons per day. Although the pumps have the ability to pump approximately 2 million gallons per day, base operations do not require this amount on a continual basis. The Mānā Well utilizes several pumps, some of which are used to move water through the piping systems to Main Base or other parcels. The remaining pumps are used to recirculate water directly back into the well if there is no demand for water on Main Base or other parcels. The allotted pumping capacity allows PMRF to utilize the 1,400 gpm if needed in the event of an emergency; however, water pumped from the Mānā Well to Main Base is approximately 400 thousand gallons per day, which is approximately 25 percent of the available well capacity. No pumpage limit to the Mānā Well has been established by the DLNR Commission on Water Resource Management. The artesian wells are not considered within this EIS as they are not part of the Proposed Project. These wells are managed by ADC and are not under Navy or NASA purview, and any contribution of these wells to the sanctuary adjacent to Main Base will not be impacted by any of the three alternatives.	Water Resources
0113	Hope Kallai		10	The DEIS barely mentions the draft NPDES permit (HI0021940/HI0021945) required for the ditch outfalls on Navy fee-simple lands and the water quality issues of atrazine, metolachlor, turbidity and 40 other agricultural chemicals found in the water delivered from ADC lands and the shrimp farm. The NPDES permit needs to be completed for inclusion in the FEIS. In 2021, **Impact of Sea-Level Rise on the Hydrologic Landscape of Māna Plain, Kauai**[8]abstract states: **Abstract** The Mānā Plain is a land apart, buffered from oceanographic influences by ~3–35 m	Thank you for providing information from the attached document regarding the hydrologic landscape of the Mānā Plain. A National Pollutant Discharge Elimination System (NPDES) permit has also been issued to cover discharge points from the Mānā Plain drainage system. Permittees are listed as ADC and County of Kaua'i. The permit requires ADC to initiate other comprehensive measures to ensure long-term environmental compliance with	Water Resources

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				high backshore deposits, and drained by an intricate, >100-y-old ditch system and modern, large-capacity pumps. Quantifying present and prospective inputs and outputs for the hydrologic landscape suggests that, although sea-level rise (SLR) will begin to impact ditch system operations in 2040, transient, event-based flooding caused by rainfall, not SLR induced, multi-mechanism flooding, will continue to pose the most immediate threat. This is because as sea level rises the ability of gravity flows to discharge storm runoff directly into the ocean will diminish, causing floodwater to pond in low-lying depressions. Estimates of the volume of water involved suggests the risk of flooding from surface water is likely to extend to 5.45 km2 of land that is presently ≤ 1 m above sea level. This land will not be permanently inundated, but weeks of pumping may be required to remove the floodwater. Increasing pumping capacity and preserving some operational ability to discharge storm runoff under the influence of gravity will enhance the ditch system's resilience to SLR and ensure it continues to fulfill its primary functions, of maintaining the water table below the root zone and diverting storm runoff away from farmland, at least until the end of this century. Footnote 8: https://www.mdpi.com/2073-4441/13/6/766	environmental laws and regulations. The final permit was issued on August 22, 2025, and became effective on October 1, 2025. More details on the final permit are discussed in Water Resources (Section 3.7.1.4.2.6, Surface Water Quality) of the Final EIS. The final permit is available on the State of Hawai'i Department of Health website at https://health.hawaii.gov/cwb/final-individual-permits/. Related, the Integrated Aquaculture International Shrimp Farm, located on the western portion of the Mānā Plain, contributes to the canal network discharge from a series of aquaculture tanks. Sampling at this farm is performed in compliance with NPDES permit #HI0021654 (issued to Sunrise Capital, Inc.). In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/ Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	
0113	Hope Kallai		11	Weeks of pumping to remove floodwater would greatly impact base operations, not considered in this DEIS. Future agriculture in the Mānā plain may revert to wetland taro and fish farms. Page 10 of the Impact of Sea-Level Rise report states: For example, were an event of similar magnitude to the March 2020 storm to occur towards the end of this century, the mixed semidiurnal tidal cycle (which has a mean and diurnal range of 0.38 m and 0.56 m, respectively) superimposed on the projected 1 m rise in sea level would increase the amount of time required for floodwater to drain freely to the ocean by ~50%. Page 12 continues: On this basis, by the end of this century 25% of the agricultural land on the Mana Plain may be exposed to flooding that is an indirect operational consequence of SLR. This land will not be permanently inundated, but it could require weeks of pumping to remove the accumulated floodwater, and the present pumping capacity of ~189,000 m3/day will likely need to be increased. SLR will reduce the proportion of storm runoff that is able to flow into the ocean through Kinikini Ditch, and its near-term effects will begin to be felt by 2040. After which time the ditch system be vulnerable to seawater intrusion if the ditch plug is removed to allow water to be discharged under the influence of gravity. As sea level rises and gravity flows can no longer be relied upon to deliver water originating from drainages on Pu'u Ka Pele slope directly into the ocean, the propensity for low-lying land on the Mana Plain to flood will also increase. The risk of flooding from surface water could extend to all 5.45 km2 of land ≤ 1 m MSL (Figure 4c). Although this land will not be permanently inundated it may require weeks of pumping to remove the floodwater. An alternative should be considered in the DEIS if the base needs to move, retreat and/or relocate some facilities to higher ground. Alternative 2 is only a change of tenure, not a real alternative consideration.	The Navy and NASA respect your concerns regarding historic use of these lands and future hydrological conditions. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/ Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. Additionally, the Navy and KAA are partnering in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain to help mitigate for impacts due to sea level rise. This area is shown in Figure 3.7-6 in the Final EIS. The Project is described in Sections 2.1 (Proposed Action) and 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS, which includes new real estate agreements and does not include relocation of facilities. Under the No Action Alternative, the analysis describes the environmental effects of the removal of Navy and NASA infrastructure from leasehold and easement lands. All the details regarding potential infrastructure removal on leasehold and easement lands are presently unknown and are subject to negotiations between the Navy and the State. Under Alternative 2, the analysis describes the environmental effects if Navy and NASA were to acquire the land. Under all of the three alternatives, there would be no change to operations at PMRF or KPGO that would change the potential for future sea level rise.	Water Resources

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0113	Hope Kallai		12	Sustainable Yield of this Kekaha aquifer 20301 is estimated to be 10 million gallons per day. Consideration of the Mānā Well pumpage is not considered in the 2024 Kauai Water Use and Development Plan, which states current pump rates for entire aquifer is 1.58 MGD, with 2035 total buildout being 1.72 MGD. Total General Plan buildout is predicted to use 4.28 MGD. I believe the other wells in Kekaha contribute to the current 1.58 MGD pump rate, military pumpage of 2 MGD not included. Abandoned, now flowing artesian wells are not included. There are mistakes and omissions in the current usage rates considered in SY.	An estimate of the maximum abandoned/artesian well flow that could occur without exceeding the sustainable yield of the aquifer is provided below: 4.28 million gallons per day (MGD) - Projected pumpage (based on development plan) at Total General Plan Buildout (post 2035) +2.00 MGD (maximum military pumpage) + 3.72 MGD (maximum flow resulting from abandoned/artesian wells before sustainable yield would be exceeded) = 10 MGD (total aquifer pumpage if the above abandoned/artesian well flow were occurring). Therefore, abandoned/artesian wells with a total flow less than 3.72 MGD would not exceed the aquifer yield.	Water Resources
0113	Hope Kallai		13	**5. DEIS fails to consider the Conservation District Use Permit application process.** Conservation District impacts not adequately considered and there is lack of discussion about obtaining Conservation District Use Permits, even on state lease lands. It is unsure what zoning is appropriate for ordnance assembly and missile launching, but a site considered spiritual Traditional Cultural Property should not be a launch pad for war training.	Table D.1-1 in Appendix D of the Final EIS provides a description of current uses, sizes, and original lease conditions of leaseholds and easement areas at Main Base. One 69.562-acre leased parcel, Tract E-1, is located in the General subzone of the Conservation State Land Use District (SLUD) and is used for ordnance assembly, maintenance facilities, and material storage. The remainder of the leasehold and easement lands at Main Base are located in the Agricultural SLUD and are zoned a mix of Agricultural and Open Space by the County of Kaua'i. All current uses of leasehold and easement lands at Main Base are either lawful uses established before October 1964 or conducted with authorizations received from the Office of Conservation and Coastal Lands as discussed in Land Use and Access (Section 3.5.1, Affected Environment) of the Final EIS.	Land Use and Access
0113	Hope Kallai		14	**6. Base construction does not adhere to FEMA flood specs, the 2019 National Defense Authorization Act and 50 year project life.** Base operations will be severely compromised with 2' passive sea level rise. Considerations under this DEIS in are not compliance with federal and state policies, like Coastal Zone Management. The Base Flood Elevation (BFE) for the base is between 15' and 25'. The FEIS must adequately consider impacts of increased flooding due to climate change and alteration of precipitation event intensity.	A discussion on Federal Emergency Management Agency Special Hazard Flood Areas is discussed in Water Resources (Section 3.7.1.4.3.1, Main Base) and flood zones shown on Figure 3.7-3 of the Final EIS. As shown in Table 6-2 (Potential Required Permits, Consultations, Reviews, and Approvals for the Proposed Action) of the Final EIS has been written in compliance with the Coastal Zone Management Act, Subpart C (16 United States Code section 1451, et seq.). In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	Ongoing Activities
0113	Hope Kallai		15	**7. DEIS fails to explain why Ocean Right-of-Way lease of 7,680 acres of submerged lands expiring in 2030 is not being considered and the future usage of those nearshore lands.** The Navy currently holds a lease for 7,680 acres of submerged lands in an ocean right-of-way (ROW) at PMRF, which is also set to expire in 2030. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy will continue to use this area pursuant to Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq., and U.S. Constitution Article I, Section 8, Clause 3. The use of submerged lands within the ROW area will remain consistent with current usage for navigation and national defense purposes (i.e., for underwater cables supporting at-sea training ranges). In the future, if the Navy's use of this area significantly 9 changes, the Navy would take appropriate actions in accordance with NEPA and inform stakeholders as appropriate.[10] DEIS is unclear about impacts of increased training exercises over this ROW and if these cables are obsolete, will they be removed? Footnote 9: All data transmitted from the undersea cables are received by facilities	As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands and does not include the ocean right-of-way. Effects from proposed changes to ongoing activities are analyzed in the 2025 HCTT Final EIS/OEIS and the 2025 PMRF LBTT Final EA. Additionally, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on marine resources. Both of these documents are available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Water Resources

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				on Navy fee simple land, where the data is then recorded and processed. These activities operate independently from the leased parcels in the Project Area. Footnote 10: https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of-4.pdf. PDF page 69.		
0113	Hope Kallai		16	**8. Bifurcating real estate and land based operations into HEPA/NEPA EIS and NEPA EA segmentalizes project.** Decisions on land leases cannot be made independent of operational considerations for those lands. The amount of Hawaii projects being concurrently presented is overwhelming. Currently, there are way too many cumulative impacts and secondary impacts from all the concurrent EIS/EA proposals[11] that have not been considered. Final acceptance of this EIS must include consideration of the concurrent projects being proposed: 1. Hawaii-CA Training and Testing EIS/OEIS (in water) 2. PACDERMA System Project-Underwater Electromagnetic Measurement System Testing EA (in water). 3. Open Floodable Space EA (land based) 4. Kawai'ele Pump Operation and Maintenance (land based). 5. Integrated Natural Resources Management Plan EA. 6. PMRF Land Based Training and Testing EA (land based). 7. PMRF-KPGO Real Estate EIS (land based). Footnote 11: https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf	As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes (HRS) Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. Consistent with HAR section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4. Section 4.1.5 (Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified. Effects from proposed changes to ongoing activities are analyzed in the 2025 Pacific Deep Electromagnetic Research Measurement Array Infrastructure Installation at PMRF Final EA, the 2025 HCTT Final EIS/OEIS, and the 2025 PMRF LBTT Final EA and are available on the EIS website at https://pmrf-kpgo-eis.com/documents. The documents are presented in Table 1-5 of the Final EIS.	Cumulative Effects
0113	Hope Kallai		17	**9. There should be no long term leases for military operations without annual cleanup requirements and periodic inspections.** The DEIS describes piles of Navy metal rubbish left in the Koke'e forest that need to be removed from state lease lands. Rubbish, including metal, old fencing, burnt barrels, cars and car parts, concrete, glass and unknowns, need to be cleaned up ASAP, with annual cleanup conditions and inspections included in the leases.	Details regarding lease agreements, including any lease terms such as site inspections, will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. As stated in Section 3.12.1.4.6 (Hazardous Materials and Waste/KPGO) in the Final EIS, DLNR drums containing refuse and paint are stored at KPGO at Site C. NASA has requested that these drums be removed and disposed of by the State of Hawai'i. Additionally, the State of Hawai'i previously stored automobiles and boats at Site C. These materials are not used the Navy or NASA.	EIS Process
0113	Hope Kallai		18	The entire 158 acre Ka'ula Island seabird sanctuary is "inaccessible" due to years of unexploded ordinance (UXO) that missed the 10 acre target area. The entire island must be cleaned up with current avian surveys before expanded operations can be considered, like 24 GUNEX and 31 BOMBEX activities annually. No state land leases without inspections and annual clean up. No more UXO left forever on state land.	The Navy and NASA respect your concerns related to Ka'ula Island. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the PMRF Land-Based Training and Testing EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land.	EIS Process
0113	Hope Kallai		19	**10. Alternatives to the base sewer "Oxidation Ponds" should be considered to prevent avian botulism, reduce hazing needs and to move from tsunami zone.** Surface dumping of untreated base wastewater and sewerage into unlined ponds has	The Navy's PMRF Natural Resource team is aware of the risks associated with avian botulism. The oxidation pond at PMRF is located on fee simple land and is not within the Project Area for this EIS (Figure 2-3 of the Final EIS). However, botulism outbreaks	Biological Resources

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				created inadvertent habitat for waterbirds, and is the only surface water available on the main base, besides the ditches, creating a high risk condition for algae blooms and botulism outbreaks. The take of 20 Hawaiian Ducks and 2 Hawaiian Coots in the 2015/2015 botulism outbreak cannot be repeated. Ponds should either be entirely fenced off from birds (creating potential increased impacts to bats) or replaced with tanks. ITP should include botulism takes.	at the oxidation pond are discussed briefly in Section 2.5 (Best Management Practices) of the Final EIS and discussed in great detail in the 2023 PMRF INRMP and the 2025 BO for Base Infrastructure Operations and Maintenance at PMRF Site on Kaua'i, Hawai'i (Appendix K of the Final EIS). Conservations measures used to minimize the threat and spread of botulism at PMRF include vegetative maintenance, water quality testing, waterbird monitoring, hazing, and relining of the oxidation pond. The U.S. Fish and Wildlife Service (USFWS) is the federal the agency that issues BOs, and determines the take limit based on biological assessments, activities conducted in the affected area, and population trends of the affected species. The Navy has also collaborated with the State to improve the State-managed Kawai'ele Waterbird Sanctuary located just east of the base, which provides habitat for many wetland-dependent species.	
0113	Hope Kallai		20	**11. There needs to be an onsite biologist to daily monitor takes under the Incidental Take Permit, not base staff, during the 10-year term of the Incidental Take Permit.** DEIS Page 1243, Vol. 4 states: KESRP Field Assistant The Navy provided a full-time Endangered Seabird Field Assistant to the Hawaii DLNR KESRP for four months in 2012 (15 May through 15 September). This position was funded by the Navy at a total of $28,000. The Navy also funded KESRP in the summer of 2013 to conduct nest monitoring in currently-known Newell's shearwater colonies on Kauai at a funding level of approximately $40,000. The Navy should fund annual salaries for 2 full-time DLNR Seabird Field Assistants for the base monitoring and off-site seabird mitigation improvements for the entire lease term. The Na Pali Seabird colony is statistically significant so night flights and training activities should be discouraged during seabird nesting from mid-March to November.	Details of the role of the biological monitors are discussed in the 2014 and 2025 BO for Base Infrastructure Operations and Maintenance at Pacific Missile Range Facility Sites on Kaua'i, Hawai'i (Appendix K of the Final EIS). In order to monitor the impact of incidental take, the Navy must report the progress of the action and its impact on the species to the USFWS as specified in the incidental take statement. [50 Code of Federal Regulations section 402.14(i)(3)]. The Navy and NASA thank you for your employment recommendation. The Installation Environmental Program Director is supported by an on-site Natural Resources Manager. Conservation actions and natural resources management activities are implemented by a team of Natural Resources biologists through a Cooperative Agreement with the Pacific Cooperative Studies Unit. Interns, volunteers or biological technicians may also be brought on to assist with natural resources tasks, when needed. The Commander, Navy Region Hawaii is responsible for the programming of resources necessary to maintain and implement INRMPs, which includes funding of installation and natural resources management staff. Further details regarding roles and responsibilities at PMRF are discussed in Section 1.4 (Navy Responsibilities) of the 2023 PMRF INRMP (Appendix K of the Final EIS). Effects to seabirds from the Navy's aircraft activities are discussed in detail in the 2025 PMRF LBTT Final EA. This document is publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources
0113	Hope Kallai		21	**12. Use of trained conservation dogs should be expanded and backup dogs obtained.** Herding by trained dogs may have the least impacts of all BASH alternatives. Carcass recovery is improved thousand-fold by daily use of dogs. DLNR Seabird Field Assistants may receive Conservation Dog Training and be the handler. Use of Conservation Dogs is essential.	The Navy and NASA thank you for your recommendation on the use of conservation dogs as a Bird/Wildlife Aircraft Strike Hazard alternative. PMRF has utilized conservation dogs for hazing efforts on the PMRF installation. The Navy and NASA continually incorporate cutting edge tools and emerging technologies to maintain operational excellence in the field of natural resources. Conservation dogs in Hawai'i play a crucial role in natural resource management, such as invasive species and avian management.	Biological Resources
0113	Hope Kallai		22	**13. Final Jurisdictional Wetland Determination should be obtained from USACE and included in FEIS.** The Wetland Determination, beginning on PDF Page 1,426, Vol. 4 concludes on page 1,450 with: **CHAPTER 5** **Conclusion** Based on the results of the wetland delineation, there are **17 individual PEM/PSS wetlands i**n the study area, comprising approximately **22.96 acres**, which exhibited the necessary parameters to be considered jurisdictional wetlands and **16.25 acres of ditches that should be considered potential waters of the U.S.** (see Table 3 and Figures 8–11 in Appendix A).	The U.S Army Corps of Engineers, under the authority of Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act, has the authority to make the final determination of the jurisdictional status and extent of waters of the U.S., including wetlands, within the study area. The Navy has no input on the timeline for acceptance of a final determination. If the final determination is complete at the time of the publication of the Final EIS, it will be included in the document by reference. The Wetland Delineation survey at PMRF was conducted in January 2024. The survey was conducted by a team of wetland scientists and led by a certified Professional Senior Wetland Scientist. The Wetland Delineation Report contains the most up to	Water Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				The USACE, under the authority of Section 404 of the CWA and Section 10 of the Rivers and Harbors Act, has the authority to make the final determination of the jurisdictional status and extent of waters of the U.S., including wetlands, within the study area. This report represents the best scientific judgement and opinions of the Stantec biologists that conducted the delineation and should be considered preliminary until concurrence has been obtained from the USACE Honolulu District in the form of a Jurisdictional Determination. The USACE Jurisdictional Determination needs to be obtained and the future hydrology of the 22.96 acres of wetlands and 16.25 acres of WOTUS ditches established and considered in the FEIS. The Operational Land-Based DEA should be expanded to a Supplemental EIS and increased operations specific to the lease lands being considered. As with the Pōhakuloa lease consideration, the Navy has had 65 years to complete the required science for this base real estate lease consideration. The Navy should finish their science before applying for long-term leases.	date information on the condition of wetlands within the survey area. The full report is available and can be found in Appendix L of the Final EIS. The Navy and NASA respect your concerns related to other military installations. However, impacts at Pōhakuloa are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	
0113	Hope Kallai		23	The FEIS should include consideration of the re-watering of the 22 acres of delineated wetlands and how much water will be required to re-establish suitable habitat for waterbirds, along with the 200 acre REPI grant project, the Open Floodable Space[12] : **3. Open Floodable Space EA** The proposed action is to manage a 200-acre open floodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals. The Ongoing Environmental Reviews at PMRF[13] does not include a timeline for the Floodable Space Project EA and the Kawai'ele Pump Operation and Maintenance EA, but does for the remaining 5 concurrent projects. **3. Open Floodable Space EA** The proposed action is to manage a 200-acre open floodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals. **4. Kawai'ele Pump Operation and Maintenance EA** The Navy proposes to continue operation and maintenance of a pump system on 3 acres of federal land to control water levels and preserve the agricultural viability of surrounding lands within Mana Plain. Both these EA's need to be included for consideration in the FEIS as they determine the dry future of the base and operations and the use of huge modern pumps on old, eroding ditch systems. Again, the Navy should finish their science before applying for long term leases. Climate change is not adequately considered in this DEIS, with climate change flooding impacts expected at PMRF by 2040, not in compliance with the 2024 Department of Defense Climate Adaptation Plan[14] which calls for plans that can sustain for 50 years, not 15. Footnote 12: https://cnrh.cnic.navy.mil/Portals/79/PMRF_Barking_Sands/Documents/PMRFProjectDescriptionsFINAL20250521WEB.pdf?ver=nQfhkxtqWzTA7q_XdFwudw== Footnote 13: https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf Footnote 14: https://www.sustainability.gov/pdfs/dod-2024-cap.pdf	The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As discussed in Past, Present, and Reasonably Foreseeable Future Actions (Section 4.1.5, Introduction to Analysis) of the Final EIS, the Open Floodable Space project is a future project, and therefore, the timeline for this project is currently unknown and next steps will be dependent on funding. If more information regarding future phases of the project is available at the time of the publication of the Final EIS, it will be included in the document. This area is shown in Figure 3.7-6 in the Final EIS. Future maintenance of the Kawai'ele Pump Operation and Maintenance is currently being negotiated; if more information is available at the time that the Final EIS is published, it will also be included in the document. Under the No Action Alternative, the Navy could no longer pay operation and maintenance costs for the Kawai'ele Pump Station (KPS). If the State chooses not to operate KPS, there could be increased surface water levels and flooding of low-lying areas of the Mānā Plain (including flooding of the Kawai'ele Bird Sanctuary) due to the unique hydrology of the area. Flooding of this area could submerge vegetation and decrease nesting and foraging habitat for some wetland-dependent wildlife. This is addressed in Water Resources (Section 3.7.2.4.1, Main Base). In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/ Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	Water Resources

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0113	Hope Kallai		24	**14. Only the shortest long-term lease should be considered.** Lease term is unspecified, except in the USFWS Biological Opinion which states 50 years. Page 1226, Volume 4 of the DEIS states: The term of the proposed action is 50 years. A 50 year lease is way too long. Unpredictable changes in technology will have advanced so much in the next 50 years, PMRF may be obsolete within 50 or 65 year lease term.. Right before the last 65-year lease was issued, my family lived on Midway Island. My father was a Navy pilot, and flew a Willy Victor on the DEW Line. That was of paramount importance back then. Now, few nonuniformed folks even know what that means. Sixty-five years from now, missiles may be antiquated and archaic, replaced with lasers from space or technology totally unknown to us now. Or perhaps from underwater. It is also impossible to predict the future depth of the Mānā Swamp groundwater aquifer and how much pumping will be necessary to keep lands contiguous to the base dry. Only the shortest long-term lease should be considered by BLNR, after the Navy completes science and reports. It is not the military's job to control development on the Mānā Plain, the wetlands determine appropriate activities, which may be lo'i kalo and loko i'a not ranching.	In response to public comments, the duration of the new real estate agreements under Alternative 1 has been clarified to state these would be for a minimum of 25 years and maximum duration as negotiated with DLNR. While the Navy and NASA considered a shorter duration (less than 25 years) for new real estate agreements, the rationale for dismissing this alternative from detailed analysis is included in Section 2.4.3 (Alternatives Considered but Not Carried Forward for Detailed Analysis/Shorter Duration Alternative) of the Final EIS. Please note that the term of the Proposed Action for the 2025 USFWS BO is 10 years, and this information may be found on page 3 of the 2025 USFWS BO in Appendix K of the Final EIS. As discussed in Section 3.7.1.4.1.1 (Water Resources/Main Base) of the Final EIS, the agricultural lands of the Mānā Plain are managed by ADC. With support from KAA and the Navy; DLNR, the County of Kaua'i, and ADC work collaboratively to manage and maintain the network of ditches, canals, drainages, and reservoirs that convey and store water across the Plain. The military does not control development of the Mānā Plain; however, the Navy has developed Enhanced Engagements in the Final EIS. As discussed in Proposed Enhanced Engagements (Section 5.2) of the Final EIS, Enhanced Engagement-5 specifically was designed to establish a Navy-DLNR-DHHL-KAA-ADC-Kaua'i County Working Group to manage water resources in West Kaua'i.	Action Alternatives
0113	Hope Kallai		25	**15. Alternatives should be presented in this DEIS for retreat from the shoreline and historic marsh areas as they will soon be wet again.** You can't wage war on the ocean The ocean always wins. Mahalo for your considerations and including my comments in the FEIS. Hope Hamilton Kallai POB 655 Kilauea, HI 96754 lokahipath2@live.com	Thank you for your comments. The Navy is aware of the unique hydrology of the Mānā Plain and understands the challenges associated with water management while considering all stakeholders. The Project is described in Sections 2.1 (Proposed Action) and 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS, which includes new real estate agreements and does not include relocation of facilities. Under either of the three alternatives, there would be no change to operations at PMRF that would change the potential for future sea level rise. However, the Navy and KAA are partnering in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain. The purpose of the projects is to mitigate impacts of sea level rise, protect and restore native forests within the watershed, and improve water quality in the nearshore environment of West Kaua'i. This area is shown in Figure 3.7-6 in the Final EIS. Thank you for your thorough review of the Draft EIS. To remain engaged in PMRF involvement, please sign up for the PMRF Kaua'i Newsletter (https://pmrfkauai.com/).	Action Alternatives
0114	Jessica Kuzmier		1	Aloha Ms. Kerry King, my name is Jessica Kuzmier and I am a resident of Hawai'i. I would like to offer my testimony with regards to the PMRF and the Koke'e Park Geophysical Observatory. First I would like to thank you and the Navy for your service to our country and your brave dedication. It is much appreciated. I also am glad for the privilege to offer testimony.	The Navy and NASA thank you for your comment and your acknowledgement of the Navy's and NASA's efforts.	EIS Process
0114	Jessica Kuzmier		2	I have assessed your alternatives as presented and with regards to what you have offered I find Alternative 3 the best out of the 3 that you offered. However, based on my preference I would like to see the Koke'e Park Geophysical Observatory be maintained within that and pursued as a fair market leasehold fee for the easement to compensate the state.	Your preference for Alternative 3, with modifications made to retain NASA-use lands, has been noted. Please note that under Alternative 1, the leases and easements would be negotiated with the State for a fair market value.	Action Alternatives

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0114	Jessica Kuzmier		3	I also would like to see the Navy to work with the State, and the residents of Kaua'i, to maintain the full acreage of the PMRF Agricultural Preservation and to allow easements for residents to access the beach.	At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage.	Action Alternatives
0114	Jessica Kuzmier		4	I am glad to see that the Navy has tried to be open about cultural preservation and environmental concerns but it is has been a hard history between the military and the state of Hawaii, particularly that of Native Hawaiian residents. I don't know how I feel about any military activity taking place in Ni'ihau, as this has been a place that has been set aside by our state for the purposes of conservation and cultural preservation. I believe in this day of computers and artificial intelligence it seems that when it comes to military practicing, much of this can be done remotely and this is why I am all right with the geophysical park and if there are to be missiles down on federal land, they are there simply for military readiness.	Thank you for the recognition of PMRF's long-term cultural resource protection. The Navy and NASA respect your concerns related to cultural and natural resources. The Proposed Action has no potential impact to Niʻihau and any impacts from previous National Environmental Policy Act (NEPA) analysis are outside the jurisdiction and scope of this EIS. Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) of the Final EIS lists the people who shared information with the Navy and NASA about cultural resources and practices in the Project Area. More details of the consultations are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS.	Action Alternatives
0114	Jessica Kuzmier		5	I have heard that we here in Hawai'i have been buzzed by Russian and Chinese spy planes near the PMRF, but it is hard to know if this is classic which came first the chicken or the egg. I understand that Hawai'i is a military target, but after Red Hill and Kaho'olawe I believe that since the Navy has a military presence in Kaua'i, it must conduct a great deal of transparent due diligence pertaining to cleaning up what it messes up and the kind of activities it conducts even on federal lands, because the ocean belongs to all of us and once it is damaged for good, then it is gone. Thank you again for the opportunity to voice my concerns as a resident of Hawai'i, and for your hard work. Jessica Kuzmier, Hawai'i	As discussed in Section 1.4 (Purpose of and Need for the Proposed Action) of the Final EIS, Navy use of these State lands is required to maintain technological and safety capabilities supporting PMRF training and testing. For NASA, these State lands are critical to maintain data collection efforts of global significance. It also ensures the continued conservation management by the Navy and NASA of natural and cultural resources on these lands. The Navy and NASA have conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawaiʻi Revised Statutes Chapter 343) and NEPA. In the Final EIS, Table 1-5 provides a comprehensive list of previous environmental documents reviewed in preparation of this EIS while Table 3.1-4 presents a comprehensive list of all relevant past environmental documents at PMRF and KPGO and summarizes key issues.	Action Alternatives
0115	Sherri Cummings		1	Aloha, Please see the attached documents of my written comments. Mahalo, Sherri Cummings Heir of James McHutcheson Sinclair Royal Patent 2944 Island of Ni'ihau	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	EIS Process
0115	Sherri Cummings		2	Formal Notice Regarding --- Draft Environmental Impact Statement for the Proposed United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Kōkeʻe Park Geophysical Observatory Real Estate, Kauaʻi, Hawaiʻi; Tax Map Keys: 4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-	The Navy and NASA note your opposition to the Proposed Action. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.): I'm commenting on the DEIS by the Pacific Missile Range and am expressing my opposition to this matter. The DEIS for the renewal of the military's lease of the west lands (Kona Moku) of Kauai, provides no current information reflecting the full scope of boundaries that are associated with its asks. As a lineal descendant from Niihau and the Puna and Kona Moku, I rise as an Ohana, whose migratory pattern includes that of the Kaulukahi Channel. These same waters were used as a means to gather for sustainable needs as well as traditional practices, (from Ni'ihau to Ke'e, Kaua'i), as done by my foremother Hoa'aloha and forefather Wahinealoha Keo, through oral accounts passed down through our kupuna. The Kapa'akai Analysis is not done to satisfaction.	HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Ka Paʻakai O Ka ʻĀina analysis is discussed in Section 3.3.2.5 (Cultural Practices/Ka Paʻakai Analysis) of the Final EIS. Please note that the Hawaiʻi Supreme Court's decision in *Ka Paʻakai O Ka ʻĀina* v *Land Use Commission* [94 Hawaiʻi 31, 7 P.3d 1068 (2000)] determined that the State is responsible for conducting the Ka Paʻakai analysis independent of the applicant, and Section 3.3.2.5 (Cultural Practices/Ka Paʻakai Analysis) is provided as a courtesy to the Board of Land and Natural Resources to assist with their analysis. Section 3.3.1.4 (Cultural Practices/Background) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA.	
0115	Sherri Cummings		3	In addition, there was no consultation process by the Hawaii State Aha Moku that was legislatively passed, to assure Native Hawaiians of its space in manners such as this. As a lineal descendant of Niihau there was no representation of my Ohana. PMRF and the Hawaii State Aha Moku representatives from the Kona moku and Niʻihau did not make others available for lineal and cultural consultation.	Section 1.7.4 and 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Intergovernmental Coordination and Ongoing Community Coordination, respectively) of the Final EIS describes intergovernmental coordination and ongoing community coordination, including consultation with State Aha Moku. The Navy and NASA are consulting with the Hawaiʻi State Aha Moku council members of Kauaʻi – Mano O Kalanipo regarding this EIS. Although Niʻihau is not located within the Project Area, the Navy and NASA are committed to conducting consultations for any future actions there.	Cultural Practices
0115	Sherri Cummings		4	Furthermore, I am calling attention to the certified affidavit of myself, which I am providing (Exhibit 1), as well as Keith G. Bukoski as recorded in the Bureau of Conveyance showing lineal descent from Mr. James McHutcheson Sinclair as heirs to Royal Patent 2944 on the Island of Niihau. We are challenging the current process of the DOD and the Robinson Family regarding the Environmental Assessment for failing to contact us.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	Cultural Practices
0115	Sherri Cummings		5	Finally, my comments here do not constitute the Kapa'akai Analysis that is required by law. I expect to be contacted moving forward as landowners and lineal descendants of Niʻihau and whose families have historically lived in Koloa (Puna District) and Waimea (Kona District) Kauaʻi. Mahalo, Sherri Cummings Heir of James McHutcheson Sinclair Royal Patent 2944 Island of Niʻihau Email: malamaanahola.sc@gmail.com	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	Cultural Practices
0116	Sharon Goodwin		1	Dear Ms Ling, When the Navy's Draft Environmental Assessment in August 2024 proposes the following: Drone operations from 2 to 45 times annually Troop maneuvers over land from 1 to 22 times annually Amphibious operations from 4 to 26 times annually Helicopter & Osprey landing zone operations from 4 to 26 times annually Operating, arming and refueling for fighter jets, helicopters, planes & Ospreys from 1 to 20 times annually my deepest angst and contemplation of the above activities resulting in land, sea, air and water degradations come to mind. I look upon military activities (maneuvers) as being the most invasive to our environment and have seen how those activities (maneuvers) culturally limit native peoples and residents of a place by making those places inaccessible or impossible to	As described in Section 2.1 (Proposed Action) of the Final EIS, the Proposed Action of the EIS is to retain real estate agreements with the State of Hawaiʻi Board of Land and Natural Resources in support of continued and ongoing military training and testing at PMRF, and does not include an increase in testing and training. Table 1-5 of the Final EIS list the resources analyzed and provides summaries of ongoing and in-water activities discussed in the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA. The 2025 LBTT EA is available at https://www.nepa.navy.mil/pmrflbttea/Pacific Missile Range Facility Land-Based Training and Testing Final Environmental Assessment. The Navy and NASA respect your concerns regarding Kahoʻolawe, Pohakuloa, and Red Hill; however, these places are outside the jurisdiction and scope of this EIS. The scope of this EIS includes land-based leaseholds and easement lands.	Ongoing Activities

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				use. You have only to look throughout history at places such as Kaho`olawe, Pohakuloa, Red Hill, PMRF, too numerous to name, to understand my thinking.		
0116	Sharon Goodwin		2	Regarding the Navy's proposals above: I prefer the No Action Alternative, and would go further to lessen some operations: Amphibious operations Reduce from 4 to 2 times annually Helicopter & Osprey landing Reduce from 4 to 0 times annually Operating, arming and refueling fighter jets, helicopters, planes and Osprey Reduce from 1 to 0 annually The Osprey has had an extremely poor history of crashing and causing many deaths since its startup in 2007. Please Retire It For Good ! ! The military must show itself to be capable of cleaning their ordinance---weapons, ammunition, missiles, bombs, grenades, other explosive devices---and also to insure their safe disposal. Sharon Goodwin Kapa`a Homestead, Kaua`i	Your preference for the No Action Alternative and to see a decrease in amphibious and air operations has been heard. There is no unexploded ordnance (UXO) on leasehold or easement lands. PMRF has conducted several large-scale surveys for UXO on fee simple land. Recently, during an infrastructure upgrade project conducted on Barking Sands, it was determined that a full Explosive Safety Submittal was required in that project area, (over 7 miles of area), and several pieces of munitions and explosives of concern were located and disposed. The Navy strives to provide long-term resource protection, and works with neighboring communities to respond to requests for cleanup. For example, in late 2022, the Department of Hawaiian Home Lands (DHHL) identified debris from an almost 60-year old missile on DHHL lands in Niu Valley, Kauaʻi. After discovery, PMRF organized an immediate Explosive Ordnance Disposal response, and determined that there was no immediate threat to the public or the environment, and began removal planning. In 2024, the PMRF Public Works and Stewardship office partnered with a local business and volunteers to clear approximately 2,300 pounds of debris from the site, and all recyclable debris was disposed of properly at a recycling center in Līhuʻe. This removal effort will allow for more effective land use for DHHL, and demonstrates the Navy's commitment to response, recovery and safe disposal of military debris.	Public Health and Safety
0117	Melodie Aduja	Democratic Party of Hawaiʻi	1	Aloha Ms. Ling, Please find attached my formal opposition testimony regarding the Draft Environmental Impact Statement (DEIS)for the proposed lease renewal of the Pacific Missile Range Facility (PMRF) and the Kekaha Range Facility (KPGO). This testimony outlines significant legal, environmental, and cultural deficiencies in the DEIS and urges the BLNR to reject it in alignment with recent precedent set by the Board in its rejection of similar military EIS documents for Pōhakuloa, Kahuku, Kawailoa–Poamoho, and Mākua. Mahalo for your time and consideration. We remain available for any follow-up or clarification. Me ka haʻahaʻa, Melodie Aduja, Co-Chair Emerita, Environmental Caucus, Democratic Party of Hawaiʻ	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. The EIS has been prepared consistent with the current federal and State legal framework.	General Opposition
0117	Melodie Aduja	Democratic Party of Hawaiʻi	2	**Formal Opposition Testimony** I. **Lease Scope and Military Rationale** The proposed lease renewal for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) represents a continuation of environmental degradation, cultural desecration, and systemic disregard for the rights and wellbeing of Kānaka Maoli. The Draft Environmental Impact Statement (DEIS), prepared jointly by the U.S. Navy and NASA, fails to meet the standards of comprehensive environmental review required under NEPA and Hawaiʻi law. It omits meaningful analysis of climate change, endangered species, cumulative impacts of militarization, and the desecration of sacred sites. These omissions are not merely technical oversights—they are symptomatic of a broader institutional failure to respect the ʻāina and its people. These omissions are not isolated incidents; they signify a widespread institutional failure to honor the ʻāina and its people. From the bombing and desecration of Kahoʻolawe to the catastrophic fuel contamination at Red Hill (Puʻuloa), the military has repeatedly demonstrated its inability and unwillingness to act as a responsible	The Navy and NASA respect your concern about impacts from the Proposed Action. The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawaiʻi Revised Statutes Chapter 343) and the National Environmental Policy Act. In order to support analysis for the Board of Land and Natural Resources (BLNR) as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends. Threats to endangered species are discussed in detail in the Biological Resources (Section 3.4.1.4, Affected Environment and 3.4.2, Environmental Consequences) of the Final EIS. A discussion on Cultural Practices can be found in Section 3.3 (Cultural Practices) of the Final EIS.	General Opposition

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				steward. The toxic legacy at Pu'unua Firing Range and the unremediated contamination at Ewa Beach further illustrate this pattern of neglect. These sites are not anomalies—they are precedents.		
0117	Melodie Aduja	Democratic Party of Hawai'i	3	As noted in the DEIS itself, the agencies seek 30-year leases for over 8,000 acres of Hawaiian land. Yet the document fails to acknowledge the historical and ongoing harm inflicted by military occupation, including contamination, habitat destruction, and cultural erasure. This pattern of neglect echoes previous rejections of military EIS documents, such as those for Pōhakuloa and Army Training Lands on O'ahu, where the Hawai'i Board of Land and Natural Resources found the Army's submissions legally insufficient. From the bombing and desecration of Kaho'olawe to the catastrophic fuel contamination at Red Hill (Pu'uloa), the military has repeatedly demonstrated its inability and unwillingness to act as a responsible steward. The toxic legacy at Pu'unua Firing Range, the unremediated contamination at Ewa Beach, and the exclusionary conditions at Kapilina Beach Homes—where residents live beside a beautiful shoreline but cannot fish, crab, swim, or recreate due to its proximity to a military waste dumpsite—further illustrate this pattern of harm. These sites are not anomalies—they are precedents. The community's response is clear. As @protectmaunakea and @waterprotectorlegal have emphasized, we must demand no new leases, full cleanup and restoration, and the return of 'āina to Kānaka Maoli. The military is not our neighbor—it is a tenant whose lease has expired, and whose continued presence threatens the ecological and cultural integrity of these islands.	Environmental effects from the Proposed Action are discussed by resource in Chapter 3 in the Final EIS. A list of the resources analyzed and the Regions of Influence (ROIs) are provided in Table 3.1-3 in the Final EIS, and includes cultural practices, air quality and greenhouse gases, archaeological and architectural resources, water resources, and hazardous materials and waste. Chapter 4 of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions. The Navy and NASA understand your concerns regarding military operations at Red Hill (Pu'uloa), Pu'unua Firing Range, and Ewa Beach; however, these areas out outside the jurisdiction and scope of this EIS.	Ongoing Activities
0117	Melodie Aduja	Democratic Party of Hawai'i	4	II. **The Military Is Not Our Neighbor** As Ethan McKown writes in The Army Is Not Our Neighbor, the military is not a co-worker or classmate—it is a tenant, and not a responsible one. It is a tenant whose lease is expired, who poisoned the well, desecrated sacred lands, and now asks for more time with a softened tone and a smile. This rhetorical shift is manipulative, designed to obscure a long history of environmental destruction, cultural erasure, and institutional impunity. The military occupies vast tracts of land, lives largely segregated from the people it claims to live among, and only emerges to participate in "community" when it needs a permit, a lease, or a bailout.	Thank you for your comment. The Navy strives to balance its mission for national defense with the long-term protection of the Kaua'i landscape and heritage. Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) of the Final EIS includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation. As shown in Table 5.2-1 of the Final EIS, Enhanced Engagement-5 includes a plan to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	General Opposition
0117	Melodie Aduja	Democratic Party of Hawai'i	5	III. **Community Benefits – Illusory and Unenforceable** The Navy and NASA assert that continued operations will: • Preserve local jobs and income • Contribute to Kaua'i's economy • Maintain conservation management at no cost to the State Yet these claims lack enforceable guarantees. The original leases were granted for $1, and there is no transparency on how future revenues will be reinvested into community programs or environmental restoration. The benefits are rhetorical, not structural.	As described in Section 3.6 (Socioeconomics) of the Final EIS, continued operation of PMRF would continue to benefit the ROI economically by providing employment (approximately 900 personnel) and expenditures of approximately $150 million annually in salaries, contract goods, and services. Continued long-term, moderate, beneficial effects on socioeconomics would result from local jobs and income from employment at KPGO. Under Alternative 1, current job levels and spending at PMRF would be unchanged and therefore would not affect job opportunities and associated spending in West Kaua'i or island wide.	Socioeconomics

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					Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. As described in Section 3.5.2 (Land Use and Access/Environmental Consequences) for Alternatives 1 and 2 in the Final EIS, the U.S. Government would enter into new leases and agreements with the State for fair market value of the leasehold and easement lands in the Project Area. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. The Navy plans to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community, as discussed in Section 5.2 (Proposed Enhanced Engagements) of the Final EIS, Enhanced Stakeholder Engagement Measures. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	
0117	Melodie Aduja	Democratic Party of Hawai'i	6	IV. **Cultural Desecration and Environmental Harm** The Draft Environmental Impact Statement (DEIS) fails to assess the full scope of harm. It omits impacts to land, water, ocean ecosystems, endangered species, sacred sites, and the health of our Peoples. There is no meaningful analysis of climate change, and no acknowledgment of the desecration, militarization, and environmental racism these projects continue to impose. The desecration of iwi kūpuna at Nohili and the construction of the Lua Kupapa'u O Nohili Crypt are not acts of stewardship—they are monuments to displacement. The DEIS's vague references to community consultation do not reflect the lived reality of exclusion and harm. This pattern is not unique to Kaua'i. At Kapilina Beach Homes in West O'ahu, residents live beside a stunning shoreline—but cannot fish, crab, swim, or recreate in the waters due to its proximity to a military waste dumpsite. The beach is visually pristine but functionally off-limits, a symbol of how military contamination transforms public trust into private hazard. This is not stewardship—it is exclusion masked by aesthetics. From Kaho'olawe to Red Hill, Pu'unua Firing Range to Ewa Beach, the military has left behind a legacy of toxic waste, broken promises, and cultural erasure. These sites are not isolated—they are cumulative. They form a pattern of harm that the DEIS refuses to acknowledge, let alone address.	Threats to endangered species are discussed in Biological Resources (Section 3.4.1.4, Biological Resources/Existing Conditions and 3.4.2, Biological Resources/Environmental Consequences) of the Final EIS. Examples of threats (include existing conditions and environmental consequences) to special status species include disease, habitat degradation, lighting, and strike. Additionally, several more threats are discussed in multiple sections in the 2023 PMRF Integrated Natural Resources Management Plan (Appendix K of the Final EIS), such as invasive species, predictable environmental trends, and predation. In order to support analysis for the BLNR as may be necessary under HEPA, the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. PMRF staff maintain ongoing consultation with native Hawaiian descendants of Mānā, and no decisions regarding iwi kūpuna are made without consulting with them. The Navy's Integrated Cultural Resource Management Plan includes best management practices and Standard Operating Procedures (SOPs) to protect cultural sites, including those with iwi kūpuna. SOP #7 that requires the Navy to identify impacts to iwi and historic properties and to resolve those impacts by avoiding, minimizing, or mitigating them before an action can proceed. SOP #10 is the Navy's plan regarding iwi if they are inadvertently discovered during any activity at PMRF, military or civilian, or are exposed by natural causes. When iwi are found, the Navy and NASA consult with appropriate native Hawaiian descendants under Native American Graves Protection and Repatriation Act to determine if iwi are to be reinterred or relocated. Chapter 4 of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill, Kaho'olawe, and Pu'unua, and Kapilina Beach are outside the	General Opposition

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					jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	
0117	Melodie Aduja	Democratic Party of Hawai‘i	7	**V. Kapilina Beach Homes – Beauty Masking Contamination** Kapilina Beach Homes in West O‘ahu offers a striking example of the military’s legacy of exclusion and environmental harm. Nestled along a visually pristine shoreline, the area evokes the image of paradise—yet residents are prohibited from fishing, crabbing, swimming, or engaging in traditional and recreational practices. The reason is chilling: the beach lies adjacent to a military waste dumpsite, rendering the waters unsafe and the land functionally off-limits. According to Navy regulations and public health advisories, the following activities are prohibited or severely restricted at Kapilina Beach Homes: • Fishing: No longer authorized in the designated Kapilina Beach Homes Fishing Area due to contamination and invasive species. Even in nearby zones, only catch-and-release fishing with pole and line gear is permitted, with a zero bag limit. • Crabbing and Shellfish Gathering: Prohibited due to longstanding advisories from the Hawai‘i Department of Health warning against consumption of fish and shellfish from Pearl Harbor and adjacent waters. • Swimming and Immersion Activities: Strongly discouraged due to proximity to military waste sites and potential exposure to hazardous pollutants. • Ocean Recreation (e.g., kayaking, snorkeling): Restricted near the Iroquois Point lagoon and Holokahiki Point, where contamination and invasive species have led to closures. This is not an isolated case. It is emblematic of how military contamination transforms public trust into private hazard. The shoreline may appear untouched, but beneath its surface lies a toxic legacy of neglect. The community is left with a beach that can be seen but not used, a coastline that invites sunbathing but forbids sustenance, ceremony, or connection. Kapilina is a microcosm of the broader pattern seen across Hawai‘i—from Kaho‘olawe’s bombed craters to Red Hill’s poisoned aquifer, from Pu‘unua’s toxic soil to Ewa Beach’s unremediated contamination. These are not accidents—they are consequences of a system that prioritizes military expansion over environmental stewardship and cultural respect. The DEIS fails to acknowledge this reality. It offers no meaningful analysis of how military occupation has severed communities from their ancestral practices, nor does it propose enforceable remediation. Kapilina Beach Homes stands as a warning: even the most beautiful places can be rendered unusable when stewardship is replaced by exploitation.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill, Kaho‘olawe, and Pu‘unua are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	Socioeconomics
0117	Melodie Aduja	Democratic Party of Hawai‘i	8	**VI. DEIS Omissions – A Disqualifying Failure of Environmental Review** The Draft Environmental Impact Statement (DEIS) omits critical components that are central to any honest environmental review. It fails to analyze the impacts of RIMPAC exercises—massive multinational war games that disrupt marine life, desecrate sacred waters, and contribute to the militarization of the Pacific. It ignores the widespread contamination from per- and polyfluoroalkyl substances (PFAS), known as “forever chemicals,” which have already poisoned aquifers at Red Hill and threaten ecosystems and human health across Hawai‘i. The DEIS also neglects to assess marine ecosystem degradation, including coral reef destruction, sonar impacts on marine mammals, and the cumulative effects of decades of weapons testing and fuel spills. These omissions are not minor—they are disqualifying. They violate the spirit and letter of the Ka Pa‘akai framework, which requires agencies to consider the cultural, environmental, and community impacts of proposed actions on Native Hawaiian rights and practices. Equally troubling is the DEIS’s presentation of the “No Action Alternative.” It is	Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai‘i Department of Health (DOH) and U.S. Fish and Wildlife Service (USFWS) through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency (EPA) screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to	Ongoing Activities

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				deliberately vague, offering no clarity on how the State would manage the land if the military vacates. This lack of transparency undermines public trust and obscures the real possibility of community-led stewardship, restoration, and cultural reconnection. The absence of a robust alternative reflects a bias toward continued militarization and a refusal to imagine a future beyond occupation.	work with the DOH during the remedial investigation process. Section 3.12.1.4.1 (Hazardous Materials and Waste/Existing Conditions) of Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 Final HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Because these areas containing marine resources are not included in the scope of the Proposed Action, they are not important historic, natural, or cultural resources located within the project area that are appropriate for consideration in the Department of Land and Natural Resources (DLNRs) Ka Pa'akai analysis. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Appendix E, and Section 5.1 (Consistency with Government Plans and Policies) of the Final EIS. Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative), discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. The Navy plans to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community, as discussed in Section 5.2 (Proposed Enhanced Engagements). PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	
0117	Melodie Aduja	Democratic Party of Hawai'i	9	**VII. BLNR Authority and Precedent for Rejecting Inadequate Environmental Impact Statements** The Hawai'i Board of Land and Natural Resources (BLNR) holds statutory authority under HRS Chapter 343 to approve or reject a Final Environmental Impact Statement (FEIS) for proposed state land dispositions. This authority is not ceremonial—it is a substantive gatekeeping function that ensures environmental, cultural, and community standards are upheld before any lease renewal or land use is granted. In recent years, the BLNR has exercised this authority to reject multiple military FEIS	The Navy and NASA respect your concerns related to other military installations. However, impacts at Pōhakuloa, Kahuku, Kawailoa-Poamoho, and Mākua training areas are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. The RIMPAC exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential	Cumulative Effects

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				submissions, including those for: • **Pōhakuloa Training Area** • **Kahuku Training Area** • **Kawailoa–Poamoho Training Area** • **Mākua Military Reservation** These rejections were grounded in legal deficiencies, outdated or incomplete biological surveys, failure to meet Ka Pa'akai standards, and lack of enforceable mitigation or restoration plans. The BLNR's decisions reflected both community testimony and internal agency review, affirming that environmental stewardship and cultural integrity are non-negotiable. Given this precedent, the Draft Environmental Impact Statement (DEIS) for the PMRF/KPGO lease renewal must be similarly rejected. It fails to: • **Analyze cumulative impacts from RIMPAC and other joint-force exercises** • **Address PFAS contamination and marine degradation** • **Provide a credible pathway for restoration or community-led stewardship** • **Meet the constitutional and statutory requirements for cultural impact assessment** The BLNR must not abdicate its responsibility by accepting a deficient DEIS or FEIS. To do so would undermine its own precedent and erode public trust in the environmental review process.	environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the DOH and USFWS through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the EPA screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. The Navy plans to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community, as discussed in Section 5.2 (Proposed Enhanced Engagements) of the Final EIS. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/. Section 3.3 (Cultural Practices) of the Final EIS summarizes the cultural impacts based on information shared during consultation for the Cultural Impact Assessment (CIA). The full CIA report can be found in Appendix F of the Final EIS. The CIA covers information shared with Navy and NASA about cultural resources and practices in the western portion of the ahupua'a of Waimea in the district of Kona on Kaua'i, extending from Kalalau Valley in the north to Kekaha Town in the south, and roughly from Waimea Canyon in the east and across Mānā Plain to the nearshore waters in the west. The CIA was conducted according to the 1997 CIA Guidelines. An additional summary of cultural impacts answering the three-part Ka Pa'akai analysis framework is presented in Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS for the convenience of the DLNR so that they can conduct their required Ka Pa'akai analysis. For more information on the consultation conducted with Native Hawaiians for the Final EIS, please see Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) of the Final EIS and the revised CIA report (which includes additional interviewees identified based on input from the Aha Moku Council and public input on the Draft EIS) in Appendix F.	

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0117	Melodie Aduja	Democratic Party of Hawai'i	10	**VIII. Conclusion** The rejection of the PMRF/KPGO DEIS is not merely a procedural necessity—it is a moral and legal imperative. The BLNR has already demonstrated its willingness to uphold environmental law and cultural integrity by rejecting similarly deficient military EIS documents. To accept this DEIS would be to ignore precedent, betray public trust, and perpetuate harm to the ʻāina and its people. We call upon the BLNR to act decisively: reject the DEIS, deny the lease renewal, and initiate a process for cleanup, restoration, and return of lands to Kānaka Maoli stewardship. The military is not our neighbor—it is a tenant whose lease has expired. The time for accountability is now. Respectfully submitted, /s/ Alan B. Burdick Alan B. Burdick Co-chair, Environmental Caucus, Democratic Party of Hawaii Email: burdick808@gmail.com /s/ Melodie Aduja Melodie Aduja Co-Chair Emerita, Environmental Caucus, Democratic Party of Hawai'I Elected Member, Community Representation Initiative (CRI), 2023 EPA – Navy – DLA Consent Order as amended Email: melodie.cri.org@gmail.com Footnote 1: U.S. Navy and NASA. *Draft Environmental Impact Statement for Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Lease Renewal*. July 2025. Available at pmrf-kpgo-eis.com/comments Footnote 2: Ethan McKown. *The Army Is Not Our Neighbo*r. August 3, 2025. Substack article Footnote 3: protectmaunakea (Instagram). Repost from @waterprotectorlegal. August 6, 2025. Instagram post	Your preference for the No Action Alternative has been noted.	General Opposition
0118	Tia Marie		1	To whom it may concern, Please respond to acknowledge you have received this email. E ʻIʻo Oki Hewa Oki Lepo Oki Pilikia Oki Maʻi Oki Makemake Waiwai E ʻIʻo Oki Hewa Oki Leop Oki Pilikia Oki Maʻi Oki Makemake Waiwai E ʻIʻo Oki Hewa Oki Leop Oki Pilikia Oki Maʻi Oki Makemake Waiwai POINT OF ORDER **Regarding the Draft Environmental Impact Statement (DEIS) for the Proposed U.S. Navy and NASA Land Retention at the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO), Kauaʻi** **Submitted on behalf of Hawaiʻi Peace & Justice and in solidarity with lineal descendants and cultural practitioners who stand in pono** **Date: August 7, 2025** I. INTRODUCTION This Point of Order is entered into the public and administrative record to document substantial legal, cultural, environmental, and ethical deficiencies within the Draft Environmental Impact Statement (DEIS) submitted by the U.S. Navy and NASA on June 20, 2025. Our purpose is not to "reject" this DEIS—because this is a draft, the point is to expose gaps, errors, omissions, and contradictions so large they cannot be remedied without substantial new study, consultation, and disclosure. We raise specific, lawful, and necessary questions that remain unanswered and that must be addressed before any Final EIS can be lawfully or ethically considered.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to the analysis. The Navy and NASA confirmed receipt of your comments via email on August 7, 2025.	EIS Process

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0118	Tia Marie		2	II. TRUST LAND STATUS AND FIDUCIARY DUTIES The lands in question are **Crown and Government Lands of the Hawaiian Kingdom**, held under the public trust created by the Statehood Admission Act §5(f) and Article XI of the Hawai'i State Constitution. • **Native Hawaiians are legal beneficiaries of this trust.** • The State of Hawai'i is a **trustee**, not an absolute owner, and cannot alienate or lease trust lands in a way that undermines their trust purpose. **Questions for the Record:** 1. Has the State or Navy obtained a formal legal opinion assessing whether Alternative #2—continuing and expanding military retention—constitutes a breach of fiduciary duty? 2. Has any Ka Pa'akai cultural impact analysis concluded that this proposed use aligns with the constitutional and statutory purposes of the trust? 3. If Alternative #2 changes the character of the land or its uses in ways inconsistent with trust purposes, how will damages to beneficiaries be calculated and compensated?	The State's adherence to its fiduciary responsibilities related to the public land trust is beyond the scope of this EIS. Ka Pa'akai O Ka 'Āina analysis is discussed in Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS. Please note that the Hawai'i Supreme Court's decision in *Ka Pa'akai O Ka 'Āina* v *Land Use Commission* [94 Hawai'i 31, 7 P.3d 1068 (2000)] determined that the State is responsible for conducting the Ka Pa'akai analysis independent of the applicant (in this case the Navy and NASA). Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS is provided as a courtesy to the Board of Land and Natural Resources (BLNR) to assist with their analysis. If Alternative 2 is selected, it would result in short-term beneficial effects to land use through the purchase of current leasehold lands and long-term beneficial effects from lease payments for the new easements. Any income received by the State from the purchase could be used in support of the State's public trust obligations.	Land Use and Access
0118	Tia Marie		3	III. CULTURAL AND ENVIRONMENTAL DEFICIENCIES The DEIS fails to meet the **Ka Pa'akai o ka 'Āina** framework under Hawai'i law and misrepresents Hawaiian culture as static "archaeological resources" rather than a living, ongoing practice. **Key Questions:** • Were ethnographic interviews conducted with lineal descendants regarding **leina a ka 'uhane** and **iwi kūpuna**? • Has the Navy analyzed how surveillance, weapons testing, and access restrictions impact cultural practices such as kilo, lawai'a, and pule? • Where is the pa'akai analysis identifying potential impairment of customary and traditional Native Hawaiian rights under Article XII, Section 7 of the Hawai'i Constitution?	Ka Pa'akai O Ka 'Āina analysis is discussed in Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS. Please note that the Hawai'i Supreme Court's decision in *Ka Pa'akai O Ka 'Āina* v *Land Use Commission* [94 Hawai'i 31, 7 P.3d 1068 (2000)] determined that the State is responsible for conducting the Ka Pa'akai analysis independent of the applicant, and Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS is provided as a courtesy to the BLNR to assist with their analysis. The Cultural Impact Assessment (CIA) was prepared specifically to provide the State with information it can use to conduct its own analysis. Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the CIA report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. The topics raised in the comment are addressed in the CIA and, where appropriate to the Proposed Action, carried over into the EIS. Preparation of the CIA involved interviews with living cultural practitioners who discussed their current practices. The CIA interviews were designed to specifically address the required elements of the Ka Pa'akai O Ka 'Āina analysis and includes a section that presents its findings according to the framework.	Cultural Practices
0118	Tia Marie		4	IV. ENVIRONMENTAL HAZARDS & CLIMATE RISKS The DEIS omits critical environmental hazard assessments: • **PFAS contamination** from firefighting foam (notably after the C-130 fire event at PMRF) • **Perchlorate contamination** from rocket propellants • Impacts of **underground fuel storage tanks** on aquifers and muliwai ecosystems **Climate Risk Gaps:** • No integration of **Hawai'i Climate Commission sea level rise projections** • No modeling of storm surge and coastal erosion impacts on PMRF's shoreline facilities • No adaptation or retreat planning for risks through 2100	Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency (EPA) screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. Section 3.12.1.4.1 (Hazardous	Public Health and Safety

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					Materials and Waste/Main Base) of Final EIS has been updated to include information on the removal of firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. The Final EIS discloses information on perchlorate testing at PMRF in Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well). Although propulsion testing is outside the scope of this EIS, the Navy and NASA have provided a link below to a publicly available paper published by the EPA, which found that perchlorate does not accumulate in soil or water, and that there were no significant differences in perchlorate concentrations in soil samples at testing ranges before or after firing missiles. This information can also be found in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/OEIS in Section 3.2 of that document. An online, pdf version of the paper published by the EPA can be found online at https://semspub.epa.gov/work/HQ/159615.pdf. As discussed in more detail in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS, per DOH regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all underground storage tanks. Please see the Final EIS for more information. In order to support analysis for the BLNR as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes Figure 3.1-1 showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends is discussed in each resource section of the Final EIS.	
0118	Tia Marie		5	V. WEAPONS TESTING & GLOBAL IMPACTS The DEIS is silent on the fact that PMRF is one of the largest military test ranges in the world, with a 60-year history of testing weapons systems that have been deployed globally—often in conflicts where human rights violations have been documented. **Systems Tested at PMRF Include:** • **Ballistic Missiles**: Minuteman III (ICBM), Trident II D5 (SLBM), Polaris (SLBM), Peacekeeper ICBM • **Missile Defense**: Aegis BMD (SM-3, SM-6), THAAD interceptors, GMD • **Cruise Missiles**: Tomahawk LACM, Harpoon, Maverick • **Precision-Guided Munitions**: JDAM, GBU-39 Small Diameter Bomb, Laser-Guided Bombs • **Anti-Satellite Systems**: Early ASAT tests with NASA & U.S. Space Force • **Directed Energy & Hypersonics**: High-power lasers, microwave weapons, and boost-glide vehicles **Global Harm Linkages:** • **Amnesty International** and **Human Rights Watch** have documented the use of U.S.-made weapons in Gaza, Yemen, Iraq, and Syria, including missile and aerial strike systems of the types tested at PMRF. • The DEIS contains no ethical or humanitarian review of these connections, nor any acknowledgment that Hawaiian lands are being used to enable warfare that harms Indigenous peoples and civilian populations abroad.	A history of land use, Navy mission, and use of State Lands at PMRF is discussed in Section 1.3 (Background) of the Final EIS.	Ongoing Activities

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0118	Tia Marie		6	VI. SANDIA NATIONAL LABORATORIES & LOCKHEED MARTIN: LEGAL ANDETHICAL RECORD Sandia National Laboratories operates at PMRF and is managed by **Sandia Corporation**, a wholly owned subsidiary of Lockheed Martin until 2017. **Documented Misconduct Includes:** 1. **2007 Whistleblower Retaliation** – New Mexico State Court awarded $4.7 million to Shawn Carpenter, a Sandia network security analyst fired after reporting massive security breaches involving hundreds of military and defense contractor networks, including sensitive Lockheed Martin data (Wikipedia, citing court records). 2. **2014–2015 DOJ Settlement** – Sandia Corporation paid $4.7 million to resolve allegations it used federal funds to lobby for renewal of its $2 billion contract to operate Sandia National Labs (U.S. DOJ Press Release, Dec. 2015). 3. **DOE Inspector General Report IG-0927** – Found that Sandia improperly charged the government for lobbying activities, violating federal law and contractual terms. 4. **Lockheed Martin Lawsuits** – Lockheed, Sandia's former parent, has faced numerous lawsuits overemployment discrimination, environmental contamination, and breach of contract, raising serious credibility and public trust concerns. **Questions for the Record:** • How can the DEIS be deemed credible when a principal contractor operating at PMRF has a documented record of misusing federal funds, retaliating against whistleblowers, and violating ethical standards? • What safeguards ensure that similar misconduct is not occurring in the context of PMRF operations today?	It is outside the scope of the EIS to evaluate histories of legal or ethical violations by contractors.	EIS Process
0118	Tia Marie		7	VII. DEMAND FOR REMEDY Based on the deficiencies and evidence above, we call for: 1. **Full independent legal review** of Alternative #2 for compliance with trust law and fiduciary duty. 2. **Comprehensive environmental hazard and contamination testing** (PFAS, perchlorate, fuel storage leaks) with public disclosure. 3. **Complete Ka Pa'akai cultural impact analysis** before any Final EIS consideration. 4. **Disclosure of all weapons systems tested at PMRF in the past 20 years** and their subsequent deployment records. 5. **Independent oversight** of all contractors at PMRF with histories of legal or ethical violations.	1) The EIS has been prepared consistent with the current federal and State legal framework. 2) Please see response to comment #4 for response regarding: PFAS identified on leasehold land and the discontinued use of PFAS-containing firefighting foams; perchlorate contamination environmental hazard assessments; and soil testing performed on soil around underground fuel storage tanks during decommissioning. 3) Ka Pa'akai O Ka 'Āina analysis is discussed in Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS. Please note that the Hawai'i Supreme Court's decision in *Ka Pa'akai O Ka 'Āina* v *Land Use Commission* [94 Hawai'i 31, 7 P.3d 1068 (2000)] determined that the State is responsible for conducting the Ka Pa'akai analysis independent of the applicant. Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS is provided as a courtesy to the BLNR to assist with their analysis. 4) Disclosure of all weapons systems tested at PMRF in the past 20 years and their subsequent deployment records is out of the scope of this EIS; however, the 2025 HCTT Final EIS/OEIS analyzes the environmental effects of weapons systems and activities, to include activities conducted at PMRF. 5) It is outside the scope of the EIS to evaluate histories of legal or ethical violations by contractors.	EIS Process
0118	Tia Marie		8	SOURCES CITED • U.S. Department of Justice, "Sandia Corporation Agrees to Pay $4.7 Million to Resolve Allegations Related to Lobbying Activities" (Dec. 23, 2015) • U.S. Department of Energy, Office of Inspector General, Report No. IG-0927 (Nov. 2014) • Wikipedia, "Sandia National Laboratories – Legal Issues" (accessed Aug. 2025)	The Navy and NASA thank you for attaching sources.	EIS Process

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				• Amnesty International, “Israel/OPT: Evidence of U.S.-Made Weapons Used in Gaza” (various reports 2014–2024) • Human Rights Watch, “U.S. Weapons in Civilian Attacks in Yemen and Gaza” (various reports 2015–2024) Tia Marie Namahana Masaniai-Estrera Mo‘opuna o Manokalanipo a me Ko Hawai‘i Pae ‘Āina		
0119	Davis Price	Kumano I Ke Ala	1	**Public Comment Submitted by Kumano I Ke Ala Co-Founder of Kumano I Ke Ala, a NHO Based in Waimea, HI.** The U.S. Navy and NASA are seeking new 30-year leases for over 8,000 acres of stolen Hawaiian lands on Kaua‘i, lands they’ve occupied for decades at the Pacific Missile Range Facility (PMRF) and Kōke‘e Park Geophysical Observatory (KPGO). Military land leases in Hawai‘i, particularly at the Pacific Missile Range Facility (PMRF) on Kaua‘i, have been a focal point of environmental and cultural concerns. The U.S. Navy and NASA currently lease approximately 8,172 acres of state land on Kaua‘i, with leases set to expire between 2027 and 2030. These leases encompass areas such as the Main Base, Kamokalā Ridge, Mānā Water Well, Miloli‘i Ridge, and Mākaha Ridge .	The Navy and NASA appreciate your comments and participation in the process.	EIS Process
0119	Davis Price	Kumano I Ke Ala	2	**Environmental and Cultural Concerns** • **Wetland Shrinkage**: The operation of pump stations at PMRF has led to the reduction of wetlands that once supported some of the largest known native waterbird populations in Hawai‘i .Aloha State Daily • **Marine Ecosystem Impact**: Residents have expressed concerns about the facility's impact on the Kaulakahi Channel between Kaua‘i and Ni‘ihau, highlighting potential disturbances to marine ecosystems .Aloha State Daily • **Per- and Polyfluoroalkyl Substances (PFAS)**: The use of aqueous film-forming foam (AFFF) at PMRF has introduced PFAS, known as "forever chemicals," into the environment. While the Navy asserts that no human health drinking water exposure pathway has been identified, the long-term environmental implications remain a concern .Kauai Now • **Cultural Desecration**: Many Native Hawaiians view the Navy's presence on lands that were never ceded to the U.S. as a form of cultural desecration. Testimonies have highlighted the disturbance of ancestral remains and the loss of access to traditional gathering sites .Kauai Now	The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all National Environmental Policy Act (NEPA)/HEPA (Hawai‘i Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As noted in Table 4.2-1 in the Final EIS, PMRF and Kekaha Agricultural Association (KAA) are partnering in an initiative supported by the Department of Defense’s (DoD’s) Readiness and Environmental Program to create an open floodable space on easement lands, which will promote the regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds. This area is shown in Figure 3.7-6 in the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service (USFWS) through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency (EPA) screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. The Final EIS has also been updated to include more information on firefighting foams containing PFAS, typically known as Aqueous Film Forming Foam (AFFF). As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage.	
0119	Davis Price	Kumano I Ke Ala	3	**Public Engagement and Response** • In 2025, the Navy and NASA released a Draft Environmental Impact Statement (EIS) to evaluate the potential environmental impacts of the proposed lease renewals. Public meetings held in Līhu'e, Kekaha, and Kapa'a saw strong community participation. Residents voiced concerns about the adequacy of the EIS, particularly its analysis of marine ecosystems and groundwater. Many also criticized the exclusion of the Rim of the Pacific (RIMPAC) exercises from the assessment .PMRF & KPGO EIS+11Maui Now+11Kauai Now+11Kauai Now	Thank you for your comment. The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	EIS Process
0119	Davis Price	Kumano I Ke Ala	4	**Economic and Strategic Considerations** • PMRF is a significant contributor to the local economy, with approximately 900 personnel, most of whom are civilians from the local community. However, we as the community need transparency as to how many multi-genrational residents benefit from job creation by PMRF. • We call on the US Navy and the many contractors that benefit from the use of these Hawaiian Kingdom lands to support the economic diversification of surrounding coommunities including Kekaha and Waimea by investing in the development of agricultural businesses a Native hawaiian owned businesses	The Navy and NASA respect your concerns related to the economic diversification of surrounding communities. As described in Section 3.6 (Socioeconomics) of the Final EIS, continued operation of PMRF would continue to benefit the Region of Influence (ROI) economically by providing employment (approximately 900 personnel) and expenditures of approximately $150 million annually in salaries, contract goods, and services. Continued long-term, moderate, beneficial effects on socioeconomics would result from local jobs and income from employment at KPGO. Under Alternative 1, current job levels and spending at PMRF would be unchanged and therefore would not affect job opportunities and associated spending in West Kaua'i or island wide.	Socioeconomics
0119	Davis Price	Kumano I Ke Ala	5	The Draft EIS fails to account for the full scope of harm to 'āina (land and waters), including: • Ongoing damage to land, water, and ocean ecosystems • Threats to endangered species and valued cultural sites and historic properties • Lack of analysis on climate change impacts	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. Impacts to Water Resources within the ROI include groundwater, surface water, floodplains, and wetlands. Existing conditions of these water resources, as well as	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				• DEIS does not adequately address impacts on long-term community health • Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration	potential environmental impacts from the Proposed Action and Action Alternatives, is discussed in detail in Section 3.7 (Water Resources) of the Final EIS. This section includes a list of best management practices and SOPs for water resource management (Table 3.7-2 in the Final EIS). Threats to endangered species are discussed in Biological Resources (Section 3.4.1.4, Biological Resources/Existing Conditions and 3.4.2, Biological Resources/Environmental Consequences) of the Final EIS. Threats are discussed in multiple sections in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) (Appendix K of the Final EIS). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the DoD's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. As described in Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date ICRMP. The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment (CIA) report found in Appendix F, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. In order to support analysis for the Board of Land and Natural Resources (BLNR) as may be necessary under HEPA, the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS	

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0119	Davis Price	Kumano I Ke Ala	6	Proposed Action: The Navy proposes to retain the use of 8,172 acres of state lands on Kaua'i in support of continued and ongoing military training and testing at PMRF. NASA proposes to retain the use of 23 acres of state lands on Kaua'i in support of maintaining data collection efforts of global significance at KPGO. The Proposed Action includes current operations that occur on leasehold and easement lands. This action would require both the Navy and NASA to succeed these agreements at fair market value.	Thank you for your comment. The Proposed Action is discussed in Section 2.1 (Proposed Action) of the Final EIS.	EIS Process
0119	Davis Price	Kumano I Ke Ala	7	What Are the Alternatives? • **Alternative 1**: The Navy and NASA would apply to BLNR for new long-term real estate agreement in the same manner as required by BLNR and for the same uses as the current leases and easements. • **Alternative 2**: The Navy and NASA would pursue fee simple acquisition of up to 700 acres (684–Navy, 16–NASA) of leaseholds, and otherwise obtain use of the remaining acreage as described in Alternative 1 • **No Action Alternative**: The State of Hawai'i would not issue the Navy and NASA any real estate agreements for the state lands on Kaua'i after expiration of the leases and easements between 2027 to 2030. The current real estate agreements for 8,172 acres with the Navy and 23 acres with NASA would expire. Existing infrastructure on Navy and NASA leasehold and easement lands could be removed or remain in place as determined by negotiations between the parties pursuant to the existing real estate agreements.	The Alternatives carried forward for detailed analysis are discussed in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS. The Alternatives have been updated as follows: • Alternative 1: The Navy and NASA apply to the DLNR for new real estate agreements with no change to the current uses in existing agreements for a minimum duration of 25 years up to a maximum duration as negotiated with DLNR (Section 2.3.1, Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements of the Final EIS). • Alternative 2: The Navy and NASA would acquire the land currently held in leaseholds with no change to existing footprint or use and obtain use of the same easements. The Navy would not pursue new real estate agreements for easements B-1 and B-2 under the action alternatives as these were temporary construction permits granted in 1977 and are no longer needed. This alternative would result in the acquisition of up to 700 acres of previously leased land. • Alternative 3 (No Action Alternative): The State of Hawai'i would not grant the Navy and NASA any new real estate agreements after expiration of the leases and easements between 2027 to 2030.	Action Alternatives
0119	Davis Price	Kumano I Ke Ala	8	Analysis of DEIS: Lack of Transparency and Unaddressed Impacts The DEIS leans in favor of continuing the leases, suggesting that the benefits of military retention outweigh the negatives. A truly comprehensive EIS should allow that conclusion to be drawn only after fully analyzing the benefits of No Action.	Text has been added to Section 3.1.4.2.3 (Introduction to the Affected Environment and Environmental Consequences/Alternative 3: No Action Alternative) of the Final EIS to clarify that in response to this comment which notes that the outcome of the No Action Alternative is unknown, a level of significance should not be presumed for this alternative. The Final EIS has been revised globally to remove any significance conclusion from the analysis for the No Action Alternative.	Action Alternatives
0119	Davis Price	Kumano I Ke Ala	9	Lack of Free, Prior and Informed Consent Although Native Hawaiian Organizations qualify as "consulting parties" in NEPA and NHPA process, the DEIS is silent on the right to free, prior, and informed consent or the Hawaiian sovereignty movement's call for the return of military-controlled lands. Although the DEIS states the Navy has contacted Hawaiian lineal descendants to carry out a Ka Pa'akai analysis, a process that government agencies must follow to avoid impinging on Native Hawaiian traditional and customary rights, greater transparency with the community is needed.	Section 3.3.2 (Cultural Practices/Environmental Consequences) summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the CIA report found in Appendix F, including details about the consultation process and the groups and individuals who were consulted. Ka Pa'akai O Ka 'Āina Analysis is discussed in Section 3.3.2.5 (Cultural Practices) of the Final EIS. Please note that the Hawai'i Supreme Court's decision in *Ka Pa'akai O Ka 'Āina* v *Land Use Commission* [94 Hawai'i 31, 7 P.3d 1068 (2000)] determined that the State is responsible for conducting the Ka Pa'akai analysis independent of the applicant. Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS is provided as a courtesy to the BLNR to assist with their analysis.	Cultural Practices
0119	Davis Price	Kumano I Ke Ala	10	Impact on Cultural Resources and Practices • Although "cultural practices" is a listed resource, the DEIS never analyzes how 24/7 security zones, radar emissions, or restricted access hinder lā'au lapa'au gathering,	Section 3.3.2 (Cultural Practices/Environmental Consequences) summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the CIA report found in Appendix F,	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				fishpond restoration, or iwi kūpuna repatriation. • The DEIS has not equally analyzed the harms of Alternative 1 and the benefits of No Action and briefly notes the perceived injustice of ongoing federal control of Native lands, but it ultimately labels cultural effects of Alternative 1 "not significant." The DEIS diminishes the significance of full access by Native Hawaiians to manage their ancestral lands and resulting harm of access restriction. • Although the DEIS states no new restrictions on access to land and resources will be imposed, there is vague language about when closures and restrictions will occur and is specifically couched in "expectations" and does not point to clarity or actual knowledge of what those restrictions would be as they pertain to the Kamokalā Ridge and locations where cultural practices, resources, and wahi pana. P. 3-53 DEIS. • The DEIS does not address how traditional cultural practices of fishing and hunting or gathering are affected. Many area residents have also expressed a desire to use the beaches and coastlines around the base that are currently off-limits.	including details about the consultation process and the groups and individuals who were consulted. Section 3.3.2.1 (Cultural Practices/Approach to Analysis) describes what a "significant effect" to cultural practices would be: new restrictions on access to locations where cultural practices occur, and the practice cannot be accomplished in another location. Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes how cultural practitioners can obtain access to PMRF and KPGO. Even though access for cultural practices is limited due to security restrictions, it is not forbidden. Because PMRF and KPGO have procedures in place for cultural practitioners to come onto the installations to conduct protocol, the impact does not meet the criteria of "significant." PMRF recognizes that these restrictions are an adverse impact, and to lessen that impact even more, Enhanced Engagement-2 (see Table 5.2-1 in the Final EIS) will streamline access PMRF for traditional Hawaiian cultural practitioners through development of a PMRF Access Management Plan.	
0119	Davis Price	Kumano I Ke Ala	11	Environment and Climate Change Adverse Impacts • The DEIS is silent on the impact of disproportionate noise, contamination, or climate hazards borne by nearby families. • Noise, biodiversity, and water all intersect with Native Hawaiian cultural practice, yet the analysis does not address or incorporate 'āina-based Indigenous ecological knowledge beyond generic references to consultation. • The DEIS does not address how continued operations might need to adapt to challenges stemming from climate change (ie. stronger storms, rising sea levels impacting land or PFAS), nor the risk that continued occupation could delay ecosystem adaptation. • Local residents have expressed concern that the DEIS also fails to account for cumulative adverse impacts after decades of water diversion, rocket launching, wargames, access restrictions, and development expansion. • The DEIS does not sufficiently address PMRF's long-term impacts on marine ecosystems. • The DEIS does not address the PMRF's impact on the Kaulakahi Channel between Kaua'i and Ni'ihau.	The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes Figure 3.1-1 showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends is discussed in each resource section of the Final EIS. Chapter 4 of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions. See response to comment #5 regarding PMRF's effects to marine resources. The Kaulakahi Channel between Kaua'i and Ni'ihau is not included in the Proposed Action, and therefore not within the scope or jurisdiction of this EIS.	Cultural Practices
0119	Davis Price	Kumano I Ke Ala	12	DEIS Lacks Analysis of Impacts on Public Health and Safety • The DEIS notes that if leases end, there would need to be "complex negotiations" to transfer environmental responsibilities and that "mitigation measures for the No Action Alternative would occur at a later time; therefore, these measures are not included herein." • The DEIS does not presently outline how the Navy would clean up or make safe the lands before returning them. We call on the US Navy, Dept of Defense, and State of Hawai'i, to menaingfully engage with the Native Hawaiian Community, ensuring that historical injustices are accounted for in future lease agreements.	Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3, (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative), of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. Additional text has been added in the Final EIS clarifying that effects from the No Action Alternative are unknown and may be subject to additional future analysis, consultations, documentation, and environmental reviews. As shown in Table 5.2-1 (PMRF and KPGO Proposed Enhanced Engagement) of the Final EIS, Enhanced Engagement-5 includes a plan to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	Public Health and Safety

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
0119	Davis Price	Kumano I Ke Ala	13	Public Comment Submitted by Kumano I Ke Ala Co-Founder of Kumano I Ke Ala, a NHO Based in Waimea, HI. The U.S. Navy and NASA are seeking new 30-year leases for over 8,000 acres of stolen Hawaiian lands on Kaua'i, lands they've occupied for decades at the Pacific Missile Range Facility (PMRF) and Kōke'e Park Geophysical Observatory (KPGO). Military land leases in Hawai'i, particularly at the Pacific Missile Range Facility (PMRF) on Kaua'i, have been a focal point of environmental and cultural concerns. The U.S. Navy and NASA currently lease approximately 8,172 acres of state land on Kaua'i, with leases set to expire between 2027 and 2030. These leases encompass areas such as the Main Base, Kamokalā Ridge, Mānā Water Well, Miloli'i Ridge, and Mākaha Ridge .	The Navy and NASA appreciate your comments and participation in the process.	EIS Process
0119	Davis Price	Kumano I Ke Ala	14	**Environmental and Cultural Concerns** • **Wetland Shrinkage**: The operation of pump stations at PMRF has led to the reduction of wetlands that once supported some of the largest known native waterbird populations in Hawai'i .Aloha State Daily • **Marine Ecosystem Impact**: Residents have expressed concerns about the facility's impact on the Kaulakahi Channel between Kaua'i and Ni'ihau, highlighting potential disturbances to marine ecosystems .Aloha State Daily • **Per- and Polyfluoroalkyl Substances (PFAS)**: The use of aqueous film-forming foam (AFFF) at PMRF has introduced PFAS, known as "forever chemicals," into the environment. While the Navy asserts that no human health drinking water exposure pathway has been identified, the long-term environmental implications remain a concern .Kauai Now • **Cultural Desecration**: Many Native Hawaiians view the Navy's presence on lands that were never ceded to the U.S. as a form of cultural desecration. Testimonies have highlighted the disturbance of ancestral remains and the loss of access to traditional gathering sites .Kauai Now	The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As noted in Table 4.2-1 of the Final EIS, the Navy and KAA are partnering in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement lands, which will promote the regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds. This area is shown in Figure 3.7-6 in the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Hazardous Materials and Waste (Section 3.12.1.4.1, Main Base) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the DOH and USFWS through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the EPA screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. The Final EIS has also been updated to include more	Ongoing Activities

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					information on firefighting foams containing PFAS, typically known as AFFF. As of 2025, all AFFFs have been successfully removed from stockpile and use across all fee simple, leasehold and easement lands at PMRF. Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At PMRF, coordination of access for cultural practices is guided by the PMRF ICRMP SOP #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage.	
0119	Davis Price	Kumano I Ke Ala	15	**Public Engagement and Response** • In 2025, the Navy and NASA released a Draft Environmental Impact Statement (EIS) to evaluate the potential environmental impacts of the proposed lease renewals. Public meetings held in Līhu'e, Kekaha, and Kapa'a saw strong community participation. Residents voiced concerns about the adequacy of the EIS, particularly its analysis of marine ecosystems and groundwater. Many also criticized the exclusion of the Rim of the Pacific (RIMPAC) exercises from the assessment .PMRF & KPGO EIS+11Maui Now+11Kauai Now+11Kauai Now	Thank you for your comment. The RIMPAC exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	EIS Process
0119	Davis Price	Kumano I Ke Ala	16	**Economic and Strategic Considerations** • PMRF is a significant contributor to the local economy, with approximately 900 personnel, most of whom are civilians from the local community. However, we as the community need transparency as to how many multi-genrational residents benefit from job creation by PMRF. • We call on the US Navy and the many contractors that benefit from the use of these Hawaiian Kingdom lands to support the economic diversification of surrounding coommunities including Kekaha and Waimea by investing in the development of agricultural businesses a Native hawaiian owned businesses	The Navy and NASA respect your concerns related to the economic diversification of surrounding communities. As described in Section 3.6 (Socioeconomics) of the Final EIS, continued operation of PMRF would continue to benefit the ROI economically by providing employment (approximately 900 personnel) and expenditures of approximately $150 million annually in salaries, contract goods, and services. Continued long-term, moderate, beneficial effects on socioeconomics would result from local jobs and income from employment at KPGO. Under Alternative 1, current job levels and spending at PMRF would be unchanged and therefore would not affect job opportunities and associated spending in West Kaua'i or island wide.	Socioeconomics
0119	Davis Price	Kumano I Ke Ala	17	The Draft EIS fails to account for the full scope of harm to 'āina (land and waters), including: • Ongoing damage to land, water, and ocean ecosystems • Threats to endangered species and valued cultural sites and historic properties • Lack of analysis on climate change impacts • DEIS does not adequately address impacts on long-term community health • Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. Water Resources within the ROI include groundwater, surface water, floodplains, and wetlands as discussed in Section 3.7 (Water Resources) of the Final EIS. This section includes a list of best management practices and SOPs used for water resource management (Table 3.7-2 of the Final EIS). Threats to endangered species are discussed in Biological Resources (Section 3.4.1.4, Existing Conditions and 3.4.2, Environmental Consequences) of the Final EIS. Threats are discussed in multiple sections in the 2023 PMRF INRMP (Appendix K of the Final EIS). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF	Ongoing Activities

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					and KPGO include the involvement of the DoD's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. As described in Section 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF maintains an up-to-date ICRMP. The ICRMP is a plan that provides coordinated management and protection of cultural resources and PMRF's mission with long-term resource protection on PMRF in a responsible manner, consistent with the entire body of existing federal laws and regulations. Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the CIA report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. In order to support analysis for the BLNR as may be necessary under HEPA, the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends is discussed in each resource section of the Final EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0119	Davis Price	Kumano I Ke Ala	18	Proposed Action: The Navy proposes to retain the use of 8,172 acres of state lands on Kaua'i in support of continued and ongoing military training and testing at PMRF. NASA proposes to retain the use of 23 acres of state lands on Kaua'i in support of maintaining data collection efforts of global significance at KPGO. The Proposed Action includes current operations that occur on leasehold and easement lands. This action would require both the Navy and NASA to succeed these agreements at fair market value.	Thank you for your comment. The Proposed Action is discussed in Section 2.1 (Proposed Action) of the Final EIS.	EIS Process
0119	Davis Price	Kumano I Ke Ala	19	What Are the Alternatives? • **Alternative 1**: The Navy and NASA would apply to BLNR for new long-term real estate agreement in the same manner as required by BLNR and for the same uses as the current leases and easements. • **Alternative 2**: The Navy and NASA would pursue fee simple acquisition of up to 700 acres (684–Navy, 16–NASA) of leaseholds, and otherwise obtain use of the remaining	The Alternatives carried forward for detailed analysis are discussed in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS.	Action Alternatives

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				acreage as described in Alternative 1 • **No Action Alternative**: The State of Hawai'i would not issue the Navy and NASA any real estate agreements for the state lands on Kaua'i after expiration of the leases and easements between 2027 to 2030. The current real estate agreements for 8,172 acres with the Navy and 23 acres with NASA would expire. Existing infrastructure on Navy and NASA leasehold and easement lands could be removed or remain in place as determined by negotiations between the parties pursuant to the existing real estate agreements.		
0119	Davis Price	Kumano I Ke Ala	20	Analysis of DEIS: Lack of Transparency and Unaddressed Impacts The DEIS leans in favor of continuing the leases, suggesting that the benefits of military retention outweigh the negatives. A truly comprehensive EIS should allow that conclusion to be drawn only after fully analyzing the benefits of No Action.	Text has been added to Section 3.1.4.2.3 (Introduction to the Affected Environment and Environmental Consequences/Alternative 3: No Action Alternative) of the Final EIS to clarify that in response to this comment which notes that the outcome of the No Action Alternative is unknown, a level of significance should not be presumed for this alternative. The Final EIS has been revised globally to remove any significance conclusion from the analysis for the No Action Alternative.	Action Alternatives
0119	Davis Price	Kumano I Ke Ala	21	Lack of Free, Prior and Informed Consent Although Native Hawaiian Organizations qualify as "consulting parties" in NEPA and NHPA process, the DEIS is silent on the right to free, prior, and informed consent or the Hawaiian sovereignty movement's call for the return of military-controlled lands. Although the DEIS states the Navy has contacted Hawaiian lineal descendants to carry out a Ka Pa'akai analysis, a process that government agencies must follow to avoid impinging on Native Hawaiian traditional and customary rights, greater transparency with the community is needed.	Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the CIA report found in Appendix F of the Final EIS, including details about the consultation process and the groups and individuals who were consulted. Ka Pa'akai O Ka 'Āina Analysis is discussed in Section 3.3.2.5 (Cultural Practices) of the Final EIS. Please note that the Hawai'i Supreme Court's decision in *Ka Pa'akai O Ka 'Āina* v *Land Use Commission* [94 Hawai'i 31, 7 P.3d 1068 (2000)] determined that the State is responsible for conducting the Ka Pa'akai analysis independent of the applicant. Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS is provided as a courtesy to the BLNR to assist with their analysis.	Cultural Practices
0119	Davis Price	Kumano I Ke Ala	22	Impact on Cultural Resources and Practices • Although "cultural practices" is a listed resource, the DEIS never analyzes how 24/7 security zones, radar emissions, or restricted access hinder lā'au lapa'au gathering, fishpond restoration, or iwi kūpuna repatriation. • The DEIS has not equally analyzed the harms of Alternative 1 and the benefits of No Action and briefly notes the perceived injustice of ongoing federal control of Native lands, but it ultimately labels cultural effects of Alternative 1 "not significant." The DEIS diminishes the significance of full access by Native Hawaiians to manage their ancestral lands and resulting harm of access restriction. • Although the DEIS states no new restrictions on access to land and resources will be imposed, there is vague language about when closures and restrictions will occur and is specifically couched in "expectations" and does not point to clarity or actual knowledge of what those restrictions would be as they pertain to the Kamokalā Ridge and locations where cultural practices, resources, and wahi pana. P. 3-53 DEIS. • The DEIS does not address how traditional cultural practices of fishing and hunting or gathering are affected. Many area residents have also expressed a desire to use the beaches and coastlines around the base that are currently off-limits.	Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the CIA report found in Appendix F of the Final EIS. Section 3.3.2.1 (Cultural Practices/Approach to Analysis) of the Final EIS describes what a "significant effect" to cultural practices would be: new restrictions on access to locations where cultural practices occur, and the practice cannot be accomplished in another location. Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes how cultural practitioners can obtain access to PMRF and KPGO. Even though access for cultural practices is limited due to security restrictions, it is not forbidden. Because PMRF and KPGO have procedures in place for cultural practitioners to come onto the installations to conduct protocol, the impact does not meet the criteria of "significant." PMRF recognizes that these restrictions are an adverse impact, and to lessen that impact even more, Enhanced Engagement-2 (see Table 5.2-1 in the Final EIS) will streamline access PMRF for traditional Hawaiian cultural practitioners through development of a PMRF Access Management Plan.	Cultural Practices
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				impacting land or PFAS), nor the risk that continued occupation could delay ecosystem adaptation. • Local residents have expressed concern that the DEIS also fails to account for cumulative adverse impacts after decades of water diversion, rocket launching, wargames, access restrictions, and development expansion. • The DEIS does not sufficiently address PMRF's long-term impacts on marine ecosystems. • The DEIS does not address the PMRF's impact on the Kaulakahi Channel between Kaua'i and Ni'ihau.	3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. Chapter 4 of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions. See response to comment #5 regarding PMRF's effects to marine resources.	
0119	Davis Price	Kumano I Ke Ala	24	DEIS Lacks Analysis of Impacts on Public Health and Safety • The DEIS notes that if leases end, there would need to be "complex negotiations" to transfer environmental responsibilities and that "mitigation measures for the No Action Alternative would occur at a later time; therefore, these measures are not included herein." • The DEIS does not presently outline how the Navy would clean up or make safe the lands before returning them. We call on the US Navy, Dept of Defense, and State of Hawai'i, to menaingfully engage with the Native Hawaiian Community, ensuring that historical injustices are accounted for in future lease agreements.	Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. Additional text has been added in the Final EIS clarifying that effects from the No Action Alternative are unknown and may be subject to additional future analysis, consultations, documentation, and environmental reviews. As shown in Table 5.2-1 (PMRF and KPGO Proposed Enhanced Engagement) of the Final EIS, Enhanced Engagement-5 includes a plan to continue to develop PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders, such as the Native Hawaiian Community. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	Public Health and Safety
0120	M MH		1	No new leases and accountability for enviornmental and cultural harm. Calling for comprehensive cleanpu and restoration, returning aina to Kanaka Maoli, the original stewards of this land. Endangered species, sacred sites are in danger with long-term health consequences for living communities; this analysis further omitted any climate change analysis which is irresponsible to our future and present people and land. Continued desecration and occupation of Native Hawaiian lands is wrong.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to biological and cultural resources. These resources are described in Sections 3.2 (Archaeological and Architectural Resources) through 3.4 (Biological Resources) of the Final EIS. In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the Final EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes Figure 3.1-1 showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. At this time, the land is under State jurisdiction by Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Action Alternatives
0121	Kelsey Amos		1	These lands belong to the Hawaiian people and should not be owned, leased or managed by the US military or the federal government. thank you, Kelsey	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	
0122	Kamakana Ferreira	OHA	1	See attached letter with OHA comments.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	EIS Process
0122	Kamakana Ferreira	OHA	2	Aloha e Ms. Ling: The Office of Hawaiian Affairs (OHA) is in receipt of the June 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kauaʻi. The Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) published this DEIS for public comment as required by the Hawaiʻi Environmental Policy Act (HEPA), Hawaiʻi Revised Statutes (HRS) Chapter 343 and the National Environmental Protection Act (NEPA), 42 U.S.C.A. § 4321 et seq. As detailed in the DEIS, existing real estate agreements are set to expire between 2027 and 2030, and the DON is proposing to retain the use of 8,172 acres of State lands to support continued military training, testing, and facility operations at PMRF and Kaʻula Island. NASA also proposes to retain the use of 23 acres of State lands at Kokeʻe in support of continued operations, including measurements of the Earth's rotation and local land motion at KPGO. Established pursuant to the terms of Section 5 of the Admissions Act, Pub. L. No. 86–3, 73 Stat. 4, 6 (1959), and Article XII, sections 4, 5, and 6 of the Hawaiʻi State Constitution, OHA serves as a semiautonomous agency and trust vehicle for the betterment of the conditions of native Hawaiians and Hawaiians. OHA's nine elected trustees exercise their powers "to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiians, including all income and proceeds from that pro rata portion of the [public lands] trust."[1] By statute, OHA is mandated to: (1) serve as principal public agency in the State of Hawaiʻi responsible for the performance, development and coordination of programs and activities relating to native Hawaiians and Hawaiians; (2) assess the policies and practices of other agencies impacting native Hawaiians and Hawaiians; and (3) conduct advocacy efforts for native Hawaiians and Hawaiians.[2] Footnote 1: Haw. Const. Art. XIII, § 6. Footnote 2: HRS § 10-3.	The Navy and NASA appreciate the clear and concise explanation of Office of Hawaiian Affairs (OHA's) interest in the public trust, role within the government, and role as advocates for native Hawaiians and Hawaiians.	Cultural Practices
0122	Kamakana Ferreira	OHA	3	Consistent with its constitutional and statutory duties to advocate for Native Hawaiians and Hawaiians, and preservation of the public land trust corpus, OHA respectfully provides the following comments for the DON's and NASA's consideration in fulfilling their legal duties under HEPA and NEPA: **Public Land Trust Considerations** The DON's current real estate agreements with the Department of Land and Natural Resources (DLNR) include 684 acres of leasehold lands and 7,664 acres of easement lands, for a total of 8,348 acres on the island of Kauaʻi. Current leases and easements are used for passive encroachment buffers, as well as for mission readiness, access, and utilities at the following five general locations: Main Base, Kamokalā Ridge, Mānā Water Well, Miloliʻi Ridge, and Mākaha Ridge. NASA's current real estate agreements with DLNR include 16 acres of leaseholds and 7 acres of easement lands, for a total of 23 acres. All of these lands are former crown and government lands of the Hawaiian Kingdom. *See* DEIS at 3-92. OHA has a paramount interest in preserving the corpus of the former crown and government lands of the Hawaiian kingdom until a resolution of the Native Hawaiian people's unrelinquished claims to these lands, including sovereignty and governance over a land base. The state and federal governments have repeatedly recognized the obligation to preserve and protect the State's public land trust as "the foundation (or	The Navy and NASA appreciate the clear and concise explanation of OHA's interest in preserving the corpus of the ceded lands, including those that have become PMRF and KPGO, through the exercise of reasonable skill and care in their management. The Final EIS is intended to aid the State and the Navy and NASA in such management.	Cultural Practices

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				starting point) for reconciliation" with the Native Hawaiian people for historic wrongs.[3] [T]he Apology Resolution and . . . related state legislation clearly contemplate that native Hawaiians (1) "never directly relinquished their claims to... their national lands to the United States," and (2) "are determined to preserve, develop and transmit to future generations their ancestral territory." As such, we believe and, therefore, hold that the Apology Resolution and related state legislation… give rise to the State's fiduciary duty to preserve the corpus of the public lands trust, specifically, the ceded lands, until such time as the unrelinquished claims of the native Hawaiians have been resolved. Such duty is consistent with the State's "obligation to use reasonable skill and care" in managing the public lands trust and the Ahuna court's declaration that the State's conduct "should... be judged by the most exacting fiduciary standards." Id. at 905 (internal citations omitted) Footnote 3: *Office of Hawaiian Affairs. v. Hous. & Comty. Dev. Corp*., 177 P.3d 884, 902 (Haw. 2008), *rev'd and remanded sub nom. Hawai'i v. Office of Hawaiian Affair*s, 556 U.S. 163 (2009) (reversed on other grounds).		
0122	Kamakana Ferreira	OHA	4	Given OHA's vested interest in the public lands trust and fiduciary duties to our beneficiaries, OHA's June 7, 2024, comment letter on the EISPN, requested that OHA be consulted as part of the lease renewal process along with representatives for the State of Hawai'i. While the DEIS itself is not responsive to this request, we understand from the July 24, 2025, discussion between the OHA Board of Trustees and representatives from the DON and NASA that OHA can expect a formal response to our request for consultation in the near future. We respectfully request that the DON and NASA share this response in the FEIS as part of the records of communications relevant to lease renewal. We further recommend that Section 3.5 include a summary of OHA's public land trust responsibilities and oversight role.	Section 1.7.4 (Public and Agency Participation and Intergovernmental Coordination/Intergovernmental Coordination) of the Final EIS describes intergovernmental coordination, including consultation with OHA. A summary of OHA's role and interest has been added in Section 3.5.1.2 (Land Use and Access/Regulatory Setting) of the Final EIS.	Cultural Practices
0122	Kamakana Ferreira	OHA	5	An additional issue of paramount concern to OHA given our constitutional role and duties, as stated in our June 7, 2024, letter, is the status of cleanup and monitoring activities at PMRF given the known harm that military activities can cause. An essential component of the State's duty to protect and preserve trust land is an obligation to reasonably monitor a third party's use of the property.[4] It is unclear, however, whether the State has been actively conducting periodic monitoring and site visits of the lease areas, as necessary to preserve the public lands trust for eventual return to the State of Hawai'i or the Native Hawaiian people. Consistent with this duty, the State should not entertain lease renewal prior to completing an independent assessment of the DON and Navy's compliance with existing lease terms, including those related to cleanup.[5] Unfortunately, the DEIS does not include any information on periodic monitoring done by the State or whether such monitoring has occurred. Rather, in response to our comment, the DEIS states that "solicitation of past DLNR monitoring and inspection records at PMRF should be made directly to the DLNR." Again, we recommend the DEIS: (1) disclose whether the State has conducted any inspections to date; and (2) disclose any concerns noted by the State as a result of such independent inspection or inspections. The public, in turn, would then be informed and able to comment via the HEPA process on the State's compliance with its mandatory trust duties and how any identified problems are being addressed and remedied. Footnote 4: *See Ching v. Case*, 145 Haw. 148, 176-77, 449 P.3d 1146, 1174-75 (2019). Footnote 5: While Ka'ula Island or Ka'ula Rock was formally transferred to the federal government in 1924, surrounding state waters and lands have been impacted by bombing over the years and should be part of State investigation into the condition of public lands.	Thank you for your recommendations. The Navy and NASA understand that OHA is asking about Department of Land and Natural Resources (DLNRs) history of inspections of the PMRF and KPGO leased lands. Please note that the EIS is analyzing the environmental effects of the proposed real estate agreements that could be enacted in the future, not DLNR's compliance with its trust duties. OHA's concerns about the State's compliance with its trust duties will be communicated to the DLNR by the Navy and NASA.	Cultural Practices

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0122	Kamakana Ferreira	OHA	6	**Lease Alternatives** In OHA's June 7, 2024, comment letter on the EISPN, we recommended that the DEIS include a meaningful analysis of a shorter-term lease option. OHA believes a shorter-term lease option is a viable option that the DON is obligated to consider pursuant to NEPA, specifically a lease term that is more than 25 years but significantly less than 65 years (e.g., 30 years). A shorter-term lease option would allow the State to evaluate the progress of the lease and to see if conditions are being met before agreeing to any longer lease extension, and thus is more consistent with its duties as articulated in *Ching v. Case*. In review of the DEIS Alternative 1, it appears the DON is still pursuing a long-term option, with "long term" use defined as anything greater than 25 years. However, the DEIS also states it is seeking a new long-term lease for a "similar duration" of time to the existing lease. DEIS at 2-8. Thus, we assume a 65-year lease term is being sought even though this is not explicitly stated in the alternative description. OHA advises that Section 2.3.1 of the DEIS should explicitly quantify what lease term is being pursued, as readers could interpret Alternative 1 to include a lease term as low as 26 years. Moreover, and more importantly, the DON should provide a systematic explanation as to its rationale for dismissing shorter lease terms from further analysis, for example 26 or 30 years.	In response to public comments, the duration of the new real estate agreements under Alternative 1 has been clarified to State these would be for a minimum of 25 years and maximum duration as negotiated with Department of Land and Natural Resources (DLNR). While the Navy and NASA considered a shorter duration for new real estate agreements (less than 25 years), the rationale for dismissing this alternative from detailed analysis is included in Section 2.4.3 (Alternatives Considered but Not Carried Forward for Detailed Analysis/Shorter Duration Alternative) of the Final EIS. This section explains that this alternative would require more frequent processing of real estate agreements. Additionally federal and State funding would be required to revisit the environmental review documentation and real estate negotiations at more frequent intervals. This alternative would not meet the Proposed Action purpose of securing Department of Defense (DoD) use (for a minimum duration of 25 years to a maximum as negotiated with DLNR) of the State land on Kaua'i for the Navy's operational continuity and sustainment of the military readiness mission and NASA's continued operations of KPGO. Therefore, this alternative does not meet the first screening factor (1) maintain longer than 25-year use of land currently used to support DoD and NASA missions on Kaua'i. It does, however, meet screening factors (2) preserve current DoD and NASA operations on Kaua'i; (3) retain existing DoD and NASA infrastructure on Kaua'i; and (4) support DLNR management of public lands and associated environmental and conservation programs on Kaua'i.	Action Alternatives
0122	Kamakana Ferreira	OHA	7	Under Alternative 2, "Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds," the DON is proposing to pursue fee simple acquisition of up to 700 acres of state lands. While OHA is opposed to alienation of the ceded lands base whether through long-term lease or fee simple acquisition, OHA notes that retention of state lands, if pursued, must involve more than simply a "fair market value" evaluation, which refers to monetary valuation of the affected lands. Rather, any retention must include mitigating measures appropriate to the level of harm including, but not limited to, for example, a longterm community benefits package for Native Hawaiians including a commitment to assist with governance initiatives, and definitive commitments for long-term restoration activities. Thus, OHA recommends including further detail in Section 2.3.2 of the DEIS regarding the process that will be pursued for this alternative (i.e., timeline, state compliance, land value assessment), and process for community consultation regarding an appropriate land valuation process.	The Navy and NASA appreciate OHA's comment that if fee simple acquisition of the leasehold parcels occur, as described under Alternative 2 in the Final EIS, that Navy and NASA should identify a long-term community benefits package for Native Hawaiians including a commitment to assist with governance initiatives, and definitive commitments for long-term restoration activities. These commitments would be determined during negotiations between the Navy, NASA, and the State if Alternative 2 were to proceed.	Action Alternatives
0122	Kamakana Ferreira	OHA	8	**Historic Preservation Compliance Coordination** In OHA's June 7, 2024, comment letter on the EISPN, we recommended coordination of federal (NHPA Section 106) and state (HRS Chapter 6E) historic preservation review processes with the environmental review process as these processes are essential to identifying historic properties and generating mitigation commitments. In review of the current DEIS, we do see that consultation with SHPD is already ongoing for HRS 6E compliance and that PMRF is operating under a 2012 Programmatic Agreement for NHPA Section 106 compliance that was recently updated in 2024. Further, PMRF has taken the approach to evaluate historic properties as traditional cultural places (TCP) as part of Section 106 considerations where appropriate to ensure a more holistic approach is applied to understanding cultural resources at the installation. Typically, a TCP designation involves consultation with cultural practitioners since it is a property that is significant to a living community because of its association with a community's traditional beliefs, customs, and practices.[6] Footnote 6: See National Park Service National Register Bulletin titled "Identifying, Evaluating, and Documenting Traditional Cultural Places", December 5, 2024: https//parkplanning.nps.gov/showFile.cfm?sfid=769780&projectID=107663	PMRF is preparing a Traditional Cultural Places (TCP) study and is including consultation with cultural practitioners. This study is anticipated to be completed in 2026.	Archaeological and Architectural Resources

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0122	Kamakana Ferreira	OHA	9	For state level compliance, the DEIS makes clear that all areas within active leaseholds and easements for utilities and roadways have already been surveyed for archaeological and architectural resources. Figure 3.2-1 provides a map of where surveys took place over the leasehold and easement areas. The most recent archaeological inventory survey (AIS) occurred in 2024 specifically in support of the EIS. As part of the 2024 AIS, eight new sites were identified that were determined to be significant under Criterion D and E. Additionally, the Nohili Dune site, which qualifies as a TCP, has also been found to be significant under Criterion A and E. OHA notes that prior to submitting these significance determinations to SHPD, the Hawai'i Administrative Rules (HAR) 13-275-6(c) require consultation with OHA and Native Hawaiians that may find the site important for Criterion E sites. Thus, as the HRS 6E and TCP processes proceed, OHA looks forward to participating in consultation.	The HRS 6E-8 review is anticipated to be completed by the time the Final EIS has been published. This will include consultation with OHA and Native Hawaiians regarding properties that may have significance under Criterion E.	Archaeological and Architectural Resources
0122	Kamakana Ferreira	OHA	10	As part of the Final EIS, OHA recommends providing a clear timetable for HRS 6E completion (inclusive of tentative consultation and HAR 13-275-6 requirements) and a summary of guidance or comments provided by SHPD so far in Section 3.2 of the DEIS. On the federal side, OHA recommends that updates be provided on the designation of the Nohili Dune site as a TCP and what additional actions (i.e., boundary adjustments, National Register updates, access) and consultations are expected to occur as part of this TCP designation.	The HRS 6E-8 review is anticipated to be completed by the time the Final EIS has been published. The results of the review will be incorporated into the Final EIS. As mentioned above, PMRF is preparing a TCP study and is including consultation with cultural practitioners. This study is anticipated to be completed in 2026.	Archaeological and Architectural Resources
0122	Kamakana Ferreira	OHA	11	**Cultural Impact Assessment (CIA)** A CIA was prepared for this project by International Archaeology, LLC, in October 2024. A total of 13 people were interviewed as part of the CIA. Most of the concerns presented pertained to access, including requests to open up camping to local families, and to provide access for surfing, fishing, and shoreline activities. Some informants did note the presence of iwi kūpuna as well. To address access, the CIA proposed use of a Morale, Welfare, and Recreation (MWR) Guest Card and coordination with cultural resource management program for cultural access. OHA notes that while the DEIS discusses access for cultural practices, it does not discuss the CIA recommendation for use of a MWR Guest Card. The DEIS only mentions that an MWR Guest Card Program began in 2005, but does not discuss the program in context of recent CIA suggestions or whether the program has been effective in meeting the community's access needs. The CIA further indicates that the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 is the guide for coordinating cultural related access, and that access to TCPs are also pending preparation of a TCP study for TCP sites (i.e., Nohili Dunes). Per Table ES-3, the DEIS states that PMRF is intending to streamline access through development of a PMRF Access Management Plan. The relevant SOP is not quoted in the DEIS to provide additional clarity on the existing access program, nor is any timetable or discussion provided on the proposed PMRF Access Management Plan. Aside from PMRF, access to KPGO is only discussed in a single sentence with a statement that reads "requests for access are made via phone or email to the KPGO Site Manager."	PMRF recognizes that even with the current Morale, Welfare and Recreation (MWR) pass system in place, restrictions on access for cultural practices are an adverse impact. To lessen that impact even more, PMRF will create a process to streamline access for traditional Hawaiian cultural practitioners through the development of a PMRF Access Management Plan (see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS). Details of the plan would be developed after the decision on the leases and easements are made by the Board of Land and Natural Resources (BLNR).	Cultural Practices
0122	Kamakana Ferreira	OHA	12	While OHA understands that managed access is necessary given the national security interests at stake, OHA supports maximizing public access to the extent feasible and consistent with national security needs. We therefore recommend that Section 3.3.1.4.3 of the DEIS expand its discussion on access to include: 1. the current SOP language that governs access; 2. a timeline for developing access programs for TCPs; 3. a timeline for developing the larger PMRF Access Management Plan; 4. a discussion on the efficacy of the MWR Guest Card Program in light of recent suggestions made in the 2024 CIA, with consideration of a valid Hawai'i driver's license as an alternative identification method to the MWR card; and	Thank you for your recommendations. Some of these have been made in the Final EIS. 1. Standard Operations Procedure (SOP) #16 language has been added at Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. 2. The TCP study is anticipated to be completed in 2026. This is stated in Section 3.2.1.5 (Archaeological and Architectural Resources/Archaeological and Architectural Resources Studies) of the Final EIS.	Cultural Practices

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				5. a feedback process to gauge whether the access program for cultural practitioners is sufficient to meet community needs and interests in accessing significant cultural sites within the PMRF footprint (both state and federal lands). The latter feedback process is suggested here as it seems based on the 2024 CIA that there are still access concerns. In regards to KPGO access, we recommend development of an actual SOP for consistency with the access process for PMRF.	3. The PMRF Access Management Plan will be developed following the decision by BLNR on the issuance of the real estate agreements. 4. The Access Management Plan is being proposed in response to comments from the public that the MWR Pass process could be improved. Details of the Access Management Plan, including requirements for identification, will be subject to DoD and Navy policies concerning security and force protection. 5. This suggestion will be considered during the development of the Access Management Program.	
0122	Kamakana Ferreira	OHA	13	**Acreage Covered** Per the May 2024 Environmental Impact Statement Preparation Notice (EISPN) for this real estate renewal, the DON initially applied for real estate agreements for 8,348 acres in leasehold areas and easements. However, the DEIS is seeking 8,172 acres total (176 acres less) without any clear explanation for the difference from the EISPN. The difference in acreage is also apparent within the DEIS itself as the DEIS's supporting studies (i.e., cultural impact assessment) contained in the appendices still notate 8,348 acres. The difference appears to be in the amount of easement lands for Kamokalā Ridge, with the DEIS claiming only 179 acres versus 355 acres in the EISPN. Appendix D of the DEIS omits a "restrictive use" easement (ESQD Easement S5604) of Kamokalā Ridge from the EISPN totaling 176.371 acres. OHA also notes that there are differences in the Tax Map Key (TMK) numbers in the EISPN and the DEIS (i.e., TMK (4)1-2-002:012, 013, 015). Notation of such changes and explanations are typically provided so the public can understand differences or revisions in scope as the HRS 343 process proceeds. Thus, OHA recommends an explanation be provided for the change in acreage and Tax Map Keys (TMKs) between the DEIS and EISPN. More importantly, if there is in fact a reduction in acreage (i.e., easement S5604), then the DEIS should explain how those lands will be restored (if being returned to the state) or what their disposition is.	1. The change in acreage corrected an error caused by double counting the acreage of overlapping easements. Explosive Safety Quantity Distance (ESQD) Easement S5604 and Easement 106 of Lease S-5804 are coterminous. Appendix D in the Final EIS has been revised at Table D.1-2 to indicate that these two easements are coterminous. 2. The change in Tax Map Keys (TMKs) was made to correct errors that had included TMK parcels that are not included in the Proposed Action. These included: (4) 1-2-001:001, a coastal parcel north of Polihale State Park misinterpreted as being included in the Mākaha Ridge "A" and "B" parcels. (4) 1-2-002:030, the Kaua'i Island Utility Cooperative (KIUC) Mānā substation excluded from Easement 104. (4) 1-2-002:011, (4) 1-2-002:012, (4) 1-2-002:013, and (4) 1-2-002:015 are Federally owned parcels and not part of the proposed leases and easements. (4) 2-1003:018 is located at Port Allen and is not part of the proposed leases and easements. 3. There is no actual reduction in acreage being sought by the Navy and NASA.	EIS Process
0122	Kamakana Ferreira	OHA	14	Additionally, it appears to OHA that the requested total acreage amount is being rounded to the nearest whole number in the DEIS. It's clear from Table 1-3 and Appendix D that the actual acreage extends out two to three decimal places, totaling 8,171.516 for PMRF and 22.900 for KPGO. This is a little over half an acre (.584) less than what is being presented for real estate renewal. OHA recommends that the requested leasehold amount be as accurate as possible within the DEIS, unless there is an explanation for any inconsistencies (i.e., if the DON is rounding down for the total acreage requested). Again, if there is any reduction in acreage from what is currently being leased, then the EIS must explain how those lands will be restored (if being returned to the state) or what their disposition is.	The Navy and NASA prioritized readability for the public while presenting acreages in the body of the EIS and, therefore, used rounded whole numbers. As noted in the comment, Appendix D in the Final EIS contains the exact acreages, down to the thousandth of an acre, and these exact numbers will be used during the real estate negotiations between the Navy, NASA, and DLNR. A footnote has been added to the Project Summary and Chapter 1 to clarify this point in the Final EIS.	EIS Process
0122	Kamakana Ferreira	OHA	15	**Biological Resources** In OHA's June 7, 2024, comment letter on the EISPN, we recommended early consultation with the United States Fish & Wildlife Service (FWS) and the Division of Forestry and Wildlife (DOFAW) as these entities can offer guidance on federal and state level compliance, respectively. We further emphasized the importance of consultation with cultural practitioners as part of biological surveys and any related conservation actions. On the federal side, the DEIS demonstrates that the DON has been in consultation with the FWS, with the most recent Biological Opinion being issued in 2025. On the state side, the DEIS reports that there is regular coordination with DOFAW personnel on invasive and protected species response efforts, and emerging landscape-scale issues. However, the discussion on page 3-60 regarding DOFAW is quite short and very general. While OHA does appreciate that the DEIS discusses the ongoing work	Thank you for your comment. Additional text regarding section 7 consultation and Division of Forestry and Wildlife collaboration has been added in the Final EIS in Section 3.4.1.2 (Biological Resources/Regulatory Setting).	Biological Resources

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				with DOFAW, the DEIS could better elaborate on these consultations with a summary of provided advice and active collaborations in Section 3.4.1.1.4.		
0122	Kamakana Ferreira	OHA	16	OHA observes on the PMRF website (https://pmrfkauai.com/Natural-and-Cultural-Resources) that PMRF is actively engaged with community partners as part of cleanup efforts and stewardship actions. This is not elaborated upon in Section 3.4 of the DEIS. Some of these activities were explained to OHA when we did a site visit of the installation on March 21, 2025, with PMRF leadership and cultural resources staff. Partnerships with DOFAW were specifically mentioned as an important part of active conservation work. OHA recommends that these community activities as they relate to biological resources be better elaborated upon in Section 3.4 of the DEIS so the public is aware of these programs and all activities occurring on state lands.	The PMRF Kaua'i website (https://pmrfkauai.com/Community-Events) highlights two community events related to biological resources. One event involves a field trip to PMRF with nearly 250 fourth graders from a school on the west side where students learned about the environment, by planting a native plant and food crop plant, and the ways that environmental professionals are working to preserve the native ecosystem. The other event involves PMRF leaders participating in the Kaua'i Regional Science and Engineering Fair with the recognition of Naval Science Award Program recipients. Both of these events are summarized in Table 1-9 of the Final EIS.	Biological Resources
0122	Kamakana Ferreira	OHA	17	Moreover, while the region of influence (ROI) analyzed in the DEIS is limited to the state lands currently leased by the DON and NASA in support of their respective activities, these lands are of course integral and important for continued operational success. Therefore, while military activities are currently undergoing concurrent environmental review, OHA notes that DON training and test activities at PMRF have significant impacts on marine ecosystems, particularly marine mammals, given the use and testing of Navy sonar from the PMRF area. Even within the defined ROI, the use of bright lights at both DON and NASA facilities can negatively impact breeding, feeding and migration of native seabirds including threatened and endangered species. Given the significance of these cultural/biological resources to OHA's beneficiaries OHA requests that a more complete summary of effects on biological resources be provided in addition to a reference to other relevant federal review documents. *See, e.g.,* DEIS at 3-85. **Closing Remarks** Mahalo for the opportunity to comment. OHA looks forward to seeing our comments taken into consideration as the Final EIS is being prepared. Should you have any questions, please contact OHA's Compliance Advocate, Kaweni Ibarra at (808) 582-0488 or by email at kawenii@oha.org. 'O wau iho nō me ka 'oia 'i'o, Stacy Ferreira Ka Pouhana, Chief Executive Officer	The Navy and NASA agree that, as described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the Navy's use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training. The team agrees, as described in Table 2-4 of the Final EIS, that some, but not all, training and testing activities conducted on federally owned land and in-water are supported by the Navy's infrastructure on State lands. Navy training and testing operations do not occur on State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) in the Final EIS. A comprehensive list of best management practices (BMPs) used for responsible and adaptive management of biological resources are outlined in Table 2.7 (PMRF and KPGO Best Management Practices and Resource Management Strategies) of the Final EIS. These include BMPs related to all special status species that could occur with the Region of Influence (ROI) including, but not limited to, sea turtles, monk seals, special status waterbirds and seabirds, and special status mammals, invertebrates, and plants. Accordingly, a BMP related to effects to endangered seabird management is in place at PMRF and KPGO. As stated in Table 2.7 in the Final EIS, the BMP is deployed so that "whenever feasible, exterior night lighting shall include bat- and bird-friendly design features such as shielded lights (to reduce ambient light), use of motion detectors and/or other automatic controls, and lighting design that uses shields to prevent light from shining upward into the sky." A comprehensive discussion on the presence of biological species within the ROI, and special status species as confirmed by natural resources surveys, is provided in Biological Resources (Section 3.4) of the Final EIS. The Navy and NASA appreciate OHA's participation in the EIS process and thorough review of the Draft EIS.	Biological Resources
0123	Hope Kallai		1	Please accept my attached comments. Mahalo	Thank you, comment received. Please see responses to your comments below.	EIS Process
0123	Hope Kallai		2	Aloha e Kerry and EIS Team: Please consider my comments in the Final Environmental Impact Statement on PMRF leases and easements. 1. **PMRF RUNWAY REPLACEMENT NOT ADEQUATELY CONSIDERED IN THIS DEIS[1].** In Table ES-1 under Biological Resources on page ES-7, Volume 1, the DEIS states "there would be no change in operations or current activities on the leasehold and easement land" considered in both Alternatives 1 and 2, but the **PMRF Land-Based Training and Testing EA[2]** considers many-fold increases in many operations on base lands and easements. The **PMRF Land Based EA** Pdf page 27 states: The Proposed Action also includes increases in training and testing activities	The Navy and NASA agree that, as described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the Navy's use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Approximately 95 percent of the easement lands are passively used for encroachment buffers and mission readiness, the remaining 5 percent of easement lands are used for access and utility easements. No ground-based training occurs on these leasehold and easement lands." The team agrees, as described in Table 2-4 of the Final EIS, that some, but not all, training and testing activities conducted on federally owned land and in-water are supported by the Navy's infrastructure on State lands.	EIS Process

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight. The **PMRF DEIS** Volume 4, Pdf page 1324[3] states: "Currently, PMRF is limited to the number of landings/takeoff allowed per runway design and life cycle. In 2025, it is anticipated the runway will be replaced to allow for additional flights and accommodate increased aircraft exercises from DoD agencies. Projections for future air operations at PMRF are detailed in Figure 1. This includes a projected increase in usage by C-17 cargo airplanes (from 176 passes per year to a projected 4,320 passes per year) and the ability of 1,440 MV-22 Osprey landings per year at PMRF." "On average, the PMRF airfield accommodated 6,441 takeoff/landings annually between 2014 and 2020." **PMRF DEIS Volume 4,** Pdf page 1325 includes Figure 1 showing doubling of air operations at PMRF (below). This runway upgrade on USA fee simple land allows for significant increases in air operations and military activities, like RIMPAC, held every other year for 5 weeks with 36 nations involved, on fee simple, state leasehold and easement lands as 1 "Activity." Footnote 1: https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of4.pdf Footnote 2: https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf Footnote 3: https://pmrf-kpgo-eis.com/media/5qyjldgz/pmrf-and-kpgo-re-deis-appendices-i-l_volume-4-of-4.pdf	Effects from proposed changes to ongoing activities are analyzed in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA. Additionally, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on marine resources These documents are available on the EIS website at https://pmrf-kpgo-eis.com/documents. The runway at Barking Sands is located on fee simple land and, therefore, impacts from runway operations are not analyzed in this EIS. This has been clarified in the Final EIS under Regulatory Setting of Biological Resources (Section 3.4.1.2) of the Final EIS.	
0123	Hope Kallai		3	The P**MRF Land-Based Training and Testing Draft EA** still under consideration, includes many new operations over leasehold and easement lands, not included in this real estate EIS which enables them. The impacts of runway replacement should be considered adequately in this DEIS. It is the most important feature of an air base and determines operations. The Proposed Action also includes increases in training and testing activities conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight.	Please see response to comment #1 for a response regarding impacts determined in the LBTT EA, impacts from operations at the runway on Barking Sands fee simple lands, and operations conducted on leasehold and easement lands. As described in Section 2.1 (Proposed Action) of the Final EIS, the Proposed Action of this EIS is to retain real estate agreements with the State of Hawai'i Department of Land and Natural Resources (DLNR) in support of continued and ongoing military training and testing at PMRF, and does not include an increase in testing and training.	EIS Process
0123	Hope Kallai		4	PMRF Land-Based EA Training and Testing EA includes Table 2.1-1 (above) on Page 30, detailing operations by "activities," which could be hours, days, weeks or months. It is impossible to extrapolate how many landings would occur in "20 activities" of unknown timing, duration or involvement. This EA was supposed to be finalized prior to this EIS. This EA should be considered in a Supplemental Land-Based Operations EIS to this real estate EIS. Runway replacement and the resulting increase in activities are not considered in the EA. 20 Refueling training activities annually are proposed on the Nohili dunes, on Conservation District lands.[4] Footnote 4: https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testingdraft-ea.pdf. PDF Page 29	Your concerns regarding publication of the 2024 PMRF LBTT Draft EA and this EIS are noted. The 2024 PMRF LBTT Draft EA was available prior to the publication of the Draft EIS for this Project. The Final EA for PMRF LBTT was completed in September 2025, well in advance of the availability of this Final EIS. This Final EIS does refer to information in the 2025 PMRF LBTT Final EA to describe ongoing activities within the Project Area on leasehold and easement lands, and is included in the HEPA (Hawai'i Revised Statutes Chapter 343) cumulative effects analysis in Chapter 4. Table 1-5 of the Final EIS provides a comprehensive list of previous environmental documents reviewed in preparation of this EIS and Table 3.1-4 of the Final EIS presents a comprehensive list of all relevant past environmental documents at PMRF and KPGO and summarizes key issues. Your recommendation to provide a supplemental EIS has been noted.	EIS Process
0123	Hope Kallai		5	**2. The consideration of "No impact" is based on stale science and past operations.** Because past levels of operations have not had significant impact, it cannot be assumed that these great increases would not. Doubling or tripling training operations as proposed in the 2024 PMRF Land-based Training and Testing EA[5] has great potential for additional impacts to the lands and infrastructure considered in this DEIS. Some activities are quadrupled, some increased from 1 event annually to 30, to be held when humpbacked whales, monk seals and turtles are not present.	As described in Section 2.1 (Proposed Action) of the Final EIS, the Proposed Action of the EIS is to retain real estate agreements with the DLNR in support of continued and ongoing military training and testing at PMRF, and does not include an increase in testing and training. Conclusions made in regard to effects to marine resources in the PMRF LBTT EA are outside of the jurisdiction of this EIS. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple	EIS Process

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				BASH activities, hazing and relocations will be increased. The 2014 Incidental Take levels established by the USFWS, (Pdf page 1225, Vol. 4) had to be increased due to increasing bird mortality due to vehicle and aircraft collisions, tower and electrical line impacts and botulism outbreaks in the Oxidation Ponds. The 2025 take levels found on Page 1371, Vol 4 are greatly increased, but not enough to reflect the expected increase due to escalating training activities presented in the EA. The 2023 **Integrated Natural Resources Management Plan**[6] states on Pdf page 188 : An avian botulism outbreak occurred in the winter of 2014/2015 at Barking Sands, resulting in the loss of at least 22 birds including 20 Hawaiian Ducks and 2 Hawaiian Coots. Two additional Hawaiian Ducks were captured and rehabilitated by the SOS veterinarians and released. Since then, smaller outbreaks have occurred in the summer as well as winter but have been relatively under control due to increased monitoring efforts. The Incidental Take Permit levels established by USFWS would have been exceeded for 20 Hawaiian Ducks and 2 Hawaiian Coots as there are no Incidental Take considerations for mortalities caused by repeat outbreaks of avian botulism in the Oxidation Ponds. There must be a better option for base wastewater than putting raw sewage in open, unlined ponds so near the ocean, with abundance of impacted endangered waterbirds. Alternative options for wastewater are not considered in this EIS. Botulism outbreak prevention methods were not considered in this EIS, even with takes and annual outbreaks. Footnote 5: https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testingdraft-ea.pdf Footnote 6: https://pacific.navfac.navy.mil/Portals/72/NAVFAC_PACIFIC/Documents/NEPA Info/2024/Final Draft PMRF INRMP December 2023.pdf?ver=BJZPkLdupQezP8EePj3thg==	acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. The oxidation pond at PMRF is located on fee simple land and is not within the Project Area for this EIS (Figure 2-3 of the Final EIS). However, botulism outbreaks at the oxidation pond is discussed briefly in Section 2.5 (Best Management Practices) of the Final EIS and discussed in great detail in the 2023 PMRF Integrated Natural Resources Management Plan (INRMP) and the 2014 and 2025 Biological Opinion (BO) for Base Infrastructure Operations and Maintenance at PMRF Site on Kaua'i, Hawai'i (Appendix K of the Final EIS).	
0123	Hope Kallai		6	**3. The Cultural Impact Assessment was inadequate in community outreach.** The only Native Hawaiians interviewed had generational economic ties to the base. Non-base Hawaiians need to be interviewed and their comments considered. Many Scoping Session cultural practitioner commentors have been impacted greatly by base security measures. These longterm leaseholds have restricted access and cultural practice for 3 generations already. The ongoing impacts to traditional cultural practices and gathering not adequately considered, especially fishing and spiritual practices around Nohili Dunes. An alternative launch site to Nohili should be considered, not on unique sand dunes considered necessary for spiritual recharge and connecting with ancestors, considered Traditional Cultural Property (TCP) in this DEIS. Why this place for missile launches? What alternative was considered? How can the base rent of the lease of this unique property full of iwi kūpuna be determined? There should be a culturally appropriate place to reconnect with ancestors that does not require a base pass, unobtainable to many community members. The impact of missiles and magazines underground at Kamokalā, in a pali surrounded with cultural sites, rock walls, heiau and leina is not appropriately considered in this DEIS or even understood by outsiders.	Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the Cultural Impact Assessment (CIA) report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Additional consultation was conducted as a result of public comments. The results of that consultation have been incorporated into the CIA and the Final EIS. Missile launch activities are discussed in detail in the PMRF LBTT EA, found on the EIS website (https://pmrf-kpgo-eis.com/documents/). A link is provided in Table 1-5 of the Final EIS. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes coordination of access to PMRF and KPGO for cultural practices. PMRF will develop an Access Management Plan (Enhanced Engagement-2 in Table 5.2-1 in the FEIS) to streamline access to traditional Hawaiian cultural practitioners while balancing the needs of public access with PMRF requirements.	Cultural Practices

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0123	Hope Kallai		7	Part of ancient rock wall on Kamokalā Ridge, by magazine ordnance area. The DEIS conversely states there are 10 underground missile magazines, with Magazines 12 and 13 being constructed in 2012 and 2013 on Tract E-3, Parcel 1 and E-3, Parcel 2 and the Kamolakā Ridge addition. It is unknown what the presence of munitions magazines does to the market value or lease rate of these lands or if more magazines will be necessary for the increased operations. One underground missile silo is intended as evacuation shelter for an unknown number of base residents. Capacity and facilities should be included. DEIS should include evacuation procedures for multi hazard events for all levels of base training events. The continued military presence in a formerly neutral kingdom impacts everybody in Hawaii, not just westside Kauaians. Many testifiers at the public meetings were angry and hurt about being kept out of their traditional lands. There is generational angst abut the base that no EIS can fix	As described in Socioeconomics (Section 3.6) of the Final EIS, details regarding lease agreements (including Kamokalā Ridge parcels) will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. As discussed in Public Health and Safety (3.9.1.4.2, Kamokalā Ridge) of the Final EIS, decommissioned caves at Kamokalā Ridge would serve as a shelter in the event of an emergency. These caves have the capacity to shelter all PMRF staff and households adjacent to PMRF. Emergency mitigation plans for leased lands are shared with all PMRF staff. As described in Section 1.1 (Project Introduction and Overview) of the Final EIS, the current and proposed use of these lands is required to maintain technological and safety capabilities supporting PMRF testing and training and continued operations including measurements of the Earth's rotation and local land motion at KPGO. The Proposed Action does not include any expansion to leasehold or easement lands. The Navy and NASA acknowledge that some Native Hawaiians feel a sense of loss and injustice from continued control of ceded lands by the U.S. Government. Please see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS. The Navy is proposing to develop a process to streamline access to traditional lands through development of a PMRF Access Management Plan that balances public access and PMRF's mission requirements.	Cultural Practices
0123	Hope Kallai		8	**4. EIS does not adequately consider the impacts of passive flooding and sea level rise from climate change.** The only Climate Change impacts considered were coastal not including the re-watering of 3 square miles of former historic marsh from passive flooding predicted to be 2' by 2050. Current pumpage rates will not suffice to dry the swamp, much of which is below sea level. Volume 1 of DEIS includes a 3.2' Sea Level Rise map on page 164, only stating: The following leasehold and easement lands are located within the 3.2-foot sea level rise exposure area scenario for purposes of BLNR's analysis under HEPA: •Leaseholds: •Tract E-1, •Tract E-2, •Tract E-2-A, •Lot 1, Lot 3, •Lot 7, Lot 10, •Lot 13, •Lot A-1, •Lot B; and •Easement Lands: •GHA Easement 1, •GHA Easement 2, Easements 100 – 104, Easement B, •Easements B-1 – B-6, Easement D, •Easement F, •Easement G Pt 1, Easement G Pt 2, Easement H Consideration of long term leases in a tsunami zone requiring the ongoing draining of swamp land deserves way more consideration than just a mere list of impacted lease lands and an orange colored map to show sea level rise, usually shown in blue. There is no operational information included for each leasehold, which is considered in the uncompleted EA. There is inadequate consideration for the hydrology of Mānā Plain and the series of 26 miles of ditches transporting water through the drained swamp in **3.7 Water Resources**, pdf page 274, Vol.1. PMRF and dryland agriculture in the Mānā Plain are dependent on the continued de-watering of the 1,700 acre Mānā Swamp.	In order to support analysis for the BLNR as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. Based on your comment, Figure 3.1-1 in the Final EIS has been revised, and sea level rise symbology has been changed from orange to blue. Under all three alternatives proposed in the EIS, there would be no change to the topography of the ROI, and portions of the leasehold and easement areas would continue to be susceptible to tsunamis. PMRF has a tsunami evacuation plan which meets the recommended elevation and distance requirements for tsunami evacuation routes. The continued pumping at Kawai'ele helps maintain viable agricultural land. Under the No Action Alternative, the Navy could choose to cease pumping at Kawai'ele which could have impacts to agricultural lands. Under the restrictive use easement, Department of Land and Natural Resources (DLNR) and Agribusiness Development Corporation (ADC) manage and control these lands including activities involving agriculture, water resource management, and public safety from tsunamis and other natural disasters. The restrictive use easement allows for limited activities on leasehold and easement lands which are described in the Affected Environments sections in Chapter 3 of the Final EIS. In consideration of the hydrology of the Mānā Plain, PMRF and Kekaha Agricultural Association (KAA) are partnering in an initiative supported by the Department of	Water Resources

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					Defense's (DoD's) Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain. The purpose of the project is to mitigate impacts of sea level rise, protect and restore native forests within the watershed, and improve water quality in the nearshore environment of West Kaua'i. This area is shown in Figure 3.7-6 in the Final EIS.	
0123	Hope Kallai		9	The Mānā Well (TMK 412002028, Water Lot 12, a 0.264 acre Ag zoned property, Market Value $224,400, including access road, Sixth Amendment to General Lease No. S-3852), (Amendment 6), CSF 24336) providing potable drinking water to the base, is under leasehold consideration. An estimate for the lease rent for this valuable well site is not included. The only alternatives (purchase or no lease) did not consider the well operation being taken over by any other leaseholder, like DHHL or KAA or ADC. The DEIS does not consider the impacts of no pumping. How much of the Mānā Plain would rewater and how deep? DEIS does not mention cost of pumped groundwater or if the CWRM has established a pumpage limit. Estimates included in the DEIS are the Mānā Well pumps 2 MGD, the main base using about ~.5 MGD. The remainder ~1.5 MGD needs to be explained. In the **2014 FEA Mānā Plain Wetland Restoration Project**[7] includes consideration of a 2012 water budget analysis completed by Kamman Hydrology & Engineering, Inc. A salt budget was also performed. The wetland basins created to form Kawai'ele Waterbird Sanctuary are supplied with groundwater, except basin N3, which uses only ditch water and N13 which uses a mixture of ditch and groundwater. The groundwater comes from an artesian well on ADC state property at about 30-35 gpm. This contribution of artesian well water is not considered in the PMRF DEIS from this well and any other unused, now artesian, wells in the former swamp. It is unknown if the water budget was updated for this re-established 100 acre wetland and if a water budget will be updated again after completion of the proposed 200 acre Open Floodable Space REPI project. Footnote 7: https://files.hawaii.gov/dbedt/erp/EA_EIS_Library/2014-02-08-KA-FEA-Mana-Plain-Wetland-Restoration-Project.pdf	Water resources, and associated activities and impacts, on the Mānā Plain are discussed throughout Section 3.7 (Water Resources) and Section 3.8 (Utilities) of the Final EIS. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value for the Mānā Well parcel, and all other parcels, will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. As discussed in Section 3.7 (Water Resources) in the Final EIS, the loss of pumping at the Kawai'ele Pump Station would cause the surface water and groundwater levels in the Mānā Plain to rise. Based on best available information regarding hydrology of the Mānā Plain, it is estimated that without the use of Kawai'ele Pump Station, water levels on the Plain would revert to pre-1920s level. During wet periods, ponds no more than 3–4 feet deep would accumulate in lower-lying areas of Plain, and would contract only through evaporation or long-term seepage. As stated in Section 3.8.1.4.3 (Utilities/Mānā Water Well) of the Final EIS, the current average pumping rate at Mānā Water Well is approximately 1,400 gallons per minute (gpm), or approximately 2 million gallons per day. Although the pumps have the ability to pump approximately 2 million gallons per day, base operations do not require this amount on a continual basis. The Mānā Well utilizes several pumps, some of which are used to move water through the piping systems to Main Base or other parcels. The remaining pumps are used to recirculate water directly back into the well if there is no demand for water on Main Base or other parcels. The allotted pumping capacity allows PMRF to utilize the 1,400 gpm if needed in the event of an emergency; however, water pumped from the Mānā Well to Main Base is approximately 400 thousand gallons per day, which is approximately 25 percent of the available well capacity. No pumpage limit to the Mānā Well has been established by the DLNR Commission on Water Resource Management. The artesian wells are not considered within this EIS as they are not part of the Proposed Project. These wells are managed by ADC and are not under Navy or NASA purview, and any contribution of these wells to the sanctuary adjacent to Main Base will not be impacted by any of the three alternatives.	Water Resources
0123	Hope Kallai		10	The DEIS barely mentions the draft NPDES permit (HI0021940/HI0021945) required for the ditch outfalls on Navy fee-simple lands and the water quality issues of atrazine, metolachlor, turbidity and 40 other agricultural chemicals found in the water delivered from ADC lands and the shrimp farm. The NPDES permit needs to be completed for inclusion in the FEIS. In 2021, **Impact of Sea-Level Rise on the Hydrologic Landscape of Māna Plain, Kauai**[8]abstract states: **Abstract** The Mānā Plain is a land apart, buffered from oceanographic influences by ~3–35 m high backshore deposits, and drained by an intricate, >100-y-old ditch system and modern, large-capacity pumps. Quantifying present and prospective inputs and outputs for the hydrologic landscape suggests that, although sea-level rise (SLR) will begin to impact ditch system operations in 2040, transient, event-based flooding caused by rainfall, not SLR induced, multi-mechanism flooding, will continue to pose	Thank you for providing information from the attached document regarding the hydrologic landscape of the Mānā Plain. A National Pollutant Discharge Elimination System (NPDES) permit has also been issued to cover discharge points from the Mānā Plain drainage system. Permittees are listed as ADC and County of Kaua'i. The permit requires ADC to initiate other comprehensive measures to ensure long-term environmental compliance with environmental laws and regulations. The final permit was issued on August 22, 2025, and became effective on October 1, 2025. More details on the final permit are discussed in Water Resources (Section 3.7.1.4.2.6, Affected Environment/Surface Water Quality) of the Final EIS. The final	Water Resources

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				the most immediate threat. This is because as sea level rises the ability of gravity flows to discharge storm runoff directly into the ocean will diminish, causing floodwater to pond in low-lying depressions. Estimates of the volume of water involved suggests the risk of flooding from surface water is likely to extend to 5.45 km2 of land that is presently ≤ 1 m above sea level. This land will not be permanently inundated, but weeks of pumping may be required to remove the floodwater. Increasing pumping capacity and preserving some operational ability to discharge storm runoff under the influence of gravity will enhance the ditch system's resilience to SLR and ensure it continues to fulfill its primary functions, of maintaining the water table below the root zone and diverting storm runoff away from farmland, at least until the end of this century. Footnote 8: https://www.mdpi.com/2073-4441/13/6/766	permit is available on the State of Hawai'i Department of Health website at https://health.hawaii.gov/cwb/final-individual-permits/. Related, the Integrated Aquaculture International Shrimp Farm, located on the western portion of the Mānā Plain, contributes to the canal network discharge from a series of aquaculture tanks. Sampling at this farm is performed in compliance with NPDES permit #HI0021654 (issued to Sunrise Capital, Inc.). In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	
0123	Hope Kallai		11	Weeks of pumping to remove floodwater would greatly impact base operations, not considered in this DEIS. Future agriculture in the Mānā plain may revert to wetland taro and fish farms. Page 10 of the Impact of Sea-Level Rise report states: For example, were an event of similar magnitude to the March 2020 storm to occur towards the end of this century, the mixed semidiurnal tidal cycle (which has a mean and diurnal range of 0.38 m and 0.56 m, respectively) superimposed on the projected 1 m rise in sea level would increase the amount of time required for floodwater to drain freely to the ocean by ~50%. Page 12 continues: On this basis, by the end of this century 25% of the agricultural land on the Mana Plain may be exposed to flooding that is an indirect operational consequence of SLR. This land will not be permanently inundated, but it could require weeks of pumping to remove the accumulated floodwater, and the present pumping capacity of ~189,000 m3/day will likely need to be increased. SLR will reduce the proportion of storm runoff that is able to flow into the ocean through Kinikini Ditch, and its near-term effects will begin tobe felt by 2040. After which time the ditch system be vulnerable to seawater intrusion if the ditch plug is removed to allow water to be discharged under the influence of gravity. As sea level rises and gravity flows can no longer be relied upon to deliver water originating from drainages on Pu'u Ka Pele slope directly into the ocean, the propensity for low-lying land on the Mana Plain to flood will also increase. The risk of flooding from surface water could extend to all 5.45 km2 of land ≤ 1 m MSL (Figure 4c). Although this land will not be permanently inundated it may require weeks of pumping to remove the floodwater. An alternative should be considered in the DEIS if the base needs to move, retreat and/or relocate some facilities to higher ground. Alternative 2 is only a change of tenure, not a real alternative consideration.	The Navy and NASA respect your concerns regarding historic use of these lands and future hydrological conditions. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. Additionally, the Navy and KAA are partnering in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain to help mitigate for impacts due to sea level rise. This area is shown in Figure 3.7-6 in the Final EIS. The Project is described in Sections 2.1 (Proposed Action) and 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS, which includes new real estate agreements and does not include relocation of facilities. Under the No Action Alternative, the analysis describes the environmental effects of the removal of Navy and NASA infrastructure from leasehold and easement lands. All the details regarding potential infrastructure removal on leasehold and easement lands are presently unknown and are subject to negotiations between the Navy and the State. Under Alternative 2, the analysis describes the environmental effects if Navy and NASA were to acquire the land. Under all of the three alternatives, there would be no change to operations at PMRF or KPGO that would change the potential for future sea level rise.	Water Resources
0123	Hope Kallai		12	Sustainable Yield of this Kekaha aquifer 20301 is estimated to be 10 million gallons per day. Consideration of the Mānā Well pumpage is not considered in the 2024 Kauai Water Use and Development Plan, which states current pump rates for entire aquifer is 1.58 MGD, with 2035 total buildout being 1.72 MGD. Total General Plan buildout is predicted to use 4.28 MGD. I believe the other wells in Kekaha contribute to the current 1.58 MGD pump rate,	An estimate of the maximum abandoned/artesian well flow that could occur without exceeding the sustainable yield of the aquifer is provided below: 4.28 million gallons per day (MGD) - Projected pumpage (based on development plan) at Total General Plan Buildout (post 2035) +2.00 MGD (maximum military pumpage) + 3.72 MGD (maximum flow resulting from abandoned/artesian wells before sustainable yield would be exceeded) = 10 MGD (total aquifer pumpage if the	Water Resources

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				military pumpage of 2 MGD not included. Abandoned, now flowing artesian wells are not included. There are mistakes and omissions in the current usage rates considered in SY.	above abandoned/artesian well flow were occurring). Therefore, abandoned/artesian wells with a total flow less than 3.72 MGD would not exceed the aquifer yield.	
0123	Hope Kallai		13	**5. DEIS fails to consider the Conservation District Use Permit application process.** Conservation District impacts not adequately considered and there is lack of discussion about obtaining Conservation District Use Permits, even on state lease lands. It is unsure what zoning is appropriate for ordnance assembly and missile launching, but a site considered spiritual Traditional Cultural Property should not be a launch pad for war training.	Table D.1-1, in Appendix D of the Final EIS, provides a description of current uses, sizes, and original lease conditions of leaseholds and easement areas at Main Base. One 69.562-acre leased parcel, Tract E-1, is located in the General subzone of the Conservation State Land Use District (SLUD) and is used for ordnance assembly, maintenance facilities, and material storage. The remainder of the leasehold and easement lands at Main Base are located in the Agricultural SLUD and are zoned a mix of Agricultural and Open Space by the County of Kaua'i. All current uses of leasehold and easement lands at Main Base are either lawful uses established before October 1964 or conducted with authorizations received from the Office of Conservation and Coastal Lands as discussed in Land Use and Access (Section 3.5.1, Affected Environment) of the Final EIS.	Land Use and Access
0123	Hope Kallai		14	**6. Base construction does not adhere to FEMA flood specs, the 2019 National Defense Authorization Act and 50 year project life.** Base operations will be severely compromised with 2' passive sea level rise. Considerations under this DEIS in are not compliance with federal and state policies, like Coastal Zone Management. The Base Flood Elevation (BFE) for the base is between 15' and 25'. The FEIS must adequately consider impacts of increased flooding due to climate change and alteration of precipitation event intensity.	A discussion on Federal Emergency Management Agency Special Hazard Flood Areas is discussed in Water Resources (Section 3.7.1.4.3.1, Main Base) and flood areas are shown on Figure 3.7-3 of the Final EIS. As shown in Table 6-2 (Potential Required Permits, Consultations, Reviews, and Approvals for the Proposed Action) of the Final EIS, this EIS has been written in compliance with the Coastal Zone Management Act, Subpart C (16 United States Code section 1451, et seq.). In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Predictable Environmental Trends (Section 3.1.2, Introduction to the Affected Environment and Environmental Consequences) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	Water Resources
0123	Hope Kallai		15	**7. DEIS fails to explain why Ocean Right-of-Way lease of 7,680 acres of submerged lands expiring in 2030 is not being considered and the future usage of those nearshore lands.** The Navy currently holds a lease for 7,680 acres of submerged lands in an ocean right-of-way (ROW) at PMRF, which is also set to expire in 2030. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy will continue to use this area pursuant to Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq., and U.S. Constitution Article I, Section 8, Clause 3. The use of submerged lands within the ROW area will remain consistent with current usage for navigation and national defense purposes (i.e., for underwater cables supporting at-sea training ranges). In the future, if the Navy's use of this area significantly 9 changes, the Navy would take appropriate actions in accordance with NEPA and inform stakeholders as appropriate.[10] DEIS is unclear about impacts of increased training exercises over this ROW and if these cables are obsolete, will they be removed? Footnote 9: All data transmitted from the undersea cables are received by facilities on Navy fee simple land, where the data is then recorded and processed. These activities operate independently from the leased parcels in the Project Area.	As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands and does not include the ocean right-of-way. Effects from proposed changes to ongoing activities are analyzed in the 2025 HCTT Final EIS/OEIS and the 2025 PMRF LBTT Final EA. Additionally, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on marine resources. Both of these documents are available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Land Use and Access

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				Footnote 10: https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of-4.pdf. PDF page 69.		
0123	Hope Kallai		16	**8. Bifurcating real estate and land based operations into HEPA/NEPA EIS and NEPA EA segmentalizes project.** Decisions on land leases cannot be made independent of operational considerations for those lands. The amount of Hawaii projects being concurrently presented is overwhelming. Currently, there are way too many cumulative impacts and secondary impacts from all the concurrent EIS/EA proposals[11] that have not been considered. Final acceptance of this EIS must include consideration of the concurrent projects being proposed: 1. Hawaii-CA Training and Testing EIS/OEIS (in water) 2. PACDERMA System Project-Underwater Electromagnetic Measurement System Testing EA (in water). 3. Open Floodable Space EA (land based) 4. Kawai'ele Pump Operation and Maintenance (land based). 5. Integrated Natural Resources Management Plan EA. 6. PMRF Land Based Training and Testing EA (land based). 7. PMRF-KPGO Real Estate EIS (land based). Footnote 11: https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf	As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes (HRS) Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. Consistent with HAR section 11-200.1-24, the Final EIS includes an analysis of cumulative effects in Chapter 4. Section 4.1.5 (Introduction to Analysis/Past, Present, and Reasonably Foreseeable Future Actions) of the Final EIS includes a list and description of past, present, and reasonably foreseeable future actions referenced in the cumulative effects analysis. No stand-alone studies were prepared for the cumulative effects analysis, and no alternative mitigation measures were identified. Effects from proposed changes to ongoing activities are analyzed in the 2025 HCTT Final EIS/OEIS and the 2025 PMRF LBTT Final EA and are available on the EIS website at https://pmrf-kpgo-eis.com/documents. The documents are presented in Table 1-5 of the Final EIS.	EIS process
0123	Hope Kallai		17	**9. There should be no long term leases for military operations without annual cleanup requirements and periodic inspections.** The DEIS describes piles of Navy metal rubbish left in the Koke'e forest that need to be removed from state lease lands. Rubbish, including metal, old fencing, burnt barrels, cars and car parts, concrete, glass and unknowns, need to be cleaned up ASAP, with annual cleanup conditions and inspections included in the leases.	Details regarding lease agreements, including any lease terms such as site inspections, will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative. As stated in Section 3.12.1.4.6 (Hazardous Materials and Waste/KPGO) in the Final EIS, DLNR drums containing refuse and paint are stored at Site C. NASA has requested that these drums be removed and disposed of by the State of Hawai'i. Additionally, the State of Hawai'i previously stored automobiles and boats at Site C. These materials are not used the Navy or NASA.	Hazardous Materials and Waste
0123	Hope Kallai		18	The entire 158 acre Ka'ula Island seabird sanctuary is "inaccessible" due to years of unexploded ordinance (UXO) that missed the 10 acre target area. The entire island must be cleaned up with current avian surveys before expanded operations can be considered, like 24 GUNEX and 31 BOMBEX activities annually. No state land leases without inspections and annual clean up. No more UXO left forever on state land.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the PMRF Land-Based Training and Testing EA. A link to that document can be found in Table 1-5 of the Final EIS. More information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. PMRF has conducted several large-scale surveys for UXO on fee simple land.	Land Use and Access
0123	Hope Kallai		19	**10. Alternatives to the base sewer "Oxidation Ponds" should be considered to prevent avian botulism, reduce hazing needs and to move from tsunami zone.** Surface dumping of untreated base wastewater and sewerage into unlined ponds has created inadvertent habitat for waterbirds, and is the only surface water available on the main base, besides the ditches, creating a high risk condition for algae blooms and botulism outbreaks.	The Navy's PMRF Natural Resource team is aware of the risks associated with avian botulism. The oxidation pond at PMRF is located on fee simple land and is not within the Project Area for this EIS (Figure 2-3 of the Final EIS). However, botulism outbreaks at the oxidation pond are discussed briefly in Section 2.5 (Best Management Practices) of the Final EIS and discussed in great detail in the 2023 PMRF INRMP and the 2025 BO for Base Infrastructure Operations and Maintenance at PMRF Site on	Biological Resources

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				The take of 20 Hawaiian Ducks and 2 Hawaiian Coots in the 2015/2015 botulism outbreak cannot be repeated. Ponds should either be entirely fenced off from birds (creating potential increased impacts to bats) or replaced with tanks. ITP should include botulism takes.	Kaua'i, Hawai'i (Appendix K of the Final EIS). Conservations measures used to minimize the threat and spread of botulism at PMRF include vegetative maintenance, water quality testing, waterbird monitoring, hazing, and relining of the oxidation pond. The U.S. Fish and Wildlife Service (USFWS) is the federal the agency that issues BOs, and determines the take limit based on biological assessments, activities conducted in the affected area, and population trends of the affected species. The Navy has also collaborated with the State to improve the State-managed Kawai'ele Waterbird Sanctuary located just east of the base, which provides habitat for many wetland-dependent species.	
0123	Hope Kallai		20	**11. There needs to be an onsite biologist to daily monitor takes under the Incidental Take Permit, not base staff, during the 10-year term of the Incidental Take Permit.** DEIS Page 1243, Vol. 4 states: KESRP Field Assistant The Navy provided a full-time Endangered Seabird Field Assistant to the Hawaii DLNR KESRP for four months in 2012 (15 May through 15 September). This position was funded by the Navy at a total of $28,000. The Navy also funded KESRP in the summer of 2013 to conduct nest monitoring in currently-known Newell's shearwater colonies on Kauai at a funding level of approximately $40,000. The Navy should fund annual salaries for 2 full-time DLNR Seabird Field Assistants for the base monitoring and off-site seabird mitigation improvements for the entire lease term. The Na Pali Seabird colony is statistically significant so night flights and training activities should be discouraged during seabird nesting from mid-March to November.	Details of the role of the biological monitors are discussed in the 2014 and 2025 BO for Base Infrastructure Operations and Maintenance at Pacific Missile Range Facility (PMRF) Sites on Kaua'i, Hawai'i (Appendix K). In order to monitor the impact of incidental take, the Navy must report the progress of the action and its impact on the species to the USFWS as specified in the incidental take statement [50 Code of Federal Regulations section 402.14(i)(3)]. The Navy and NASA thank you for your employment recommendation. The Installation Environmental Program Director is supported by an on-site Natural Resources Manager. Conservation actions and natural resources management activities are implemented by a team of Natural Resources biologists through a Cooperative Agreement with the Pacific Cooperative Studies Unit. Interns, volunteers or biological technicians may also be brought on to assist with natural resources tasks, when needed. The Commander, Navy Region Hawaii is responsible for the programming of resources necessary to maintain and implement INRMPs, which includes funding of installation and natural resources management staff. Further details regarding roles and responsibilities at PMRF are discussed in Section 1.4 of the 2023 PMRF INRMP (Appendix K of the Final EIS). Effects to seabirds from the Navy's aircraft activities are discussed in detail in the 2025 PMRF LBTT Final EA. This document is publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources
0123	Hope Kallai		21	**12. Use of trained conservation dogs should be expanded and backup dogs obtained.** Herding by trained dogs may have the least impacts of all BASH alternatives. Carcass recovery is improved thousand-fold by daily use of dogs. DLNR Seabird Field Assistants may receive Conservation Dog Training and be the handler. Use of Conservation Dogs is essential.	The Navy and NASA thank you for your recommendation on the use of conservation dogs as a Bird/Wildlife Aircraft Strike Hazard alternative. PMRF has utilized conservation dogs for hazing efforts on the PMRF installation. The Navy and NASA continually incorporate cutting edge tools and emerging technologies to maintain operational excellence in the field of natural resources. Conservation dogs in Hawai'i play a crucial role in natural resource management, such as invasive species and avian management.	Biological Resources
0123	Hope Kallai		22	**13. Final Jurisdictional Wetland Determination should be obtained from USACE and included in FEIS.** The Wetland Determination, beginning on PDF Page 1,426, Vol. 4 concludes on page 1,450 with: **CHAPTER 5** **Conclusion** Based on the results of the wetland delineation, there are **17 individual PEM/PSS wetlands i**n the study area, comprising approximately **22.96 acres**, which exhibited the necessary parameters to be considered jurisdictional wetlands and **16.25 acres of ditches that should be considered potential waters of the U.S.** (see Table 3 and Figures 8–11 in Appendix A). The USACE, under the authority of Section 404 of the CWA and Section 10 of the Rivers and Harbors Act, has the authority to make the final determination of the jurisdictional status and extent of waters of the U.S., including wetlands, within the	The U.S Army Corps of Engineers, under the authority of Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act, has the authority to make the final determination of the jurisdictional status and extent of waters of the U.S., including wetlands, within the study area. The Navy has no input on the timeline for acceptance of a final determination. If the final determination is complete at the time of the publication of the Final EIS, it will be included in the document by reference. The Wetland Delineation survey at PMRF was conducted in January 2024. The survey was conducted by a team of wetland scientists and led by a certified Professional Senior Wetland Scientist. The Wetland Delineation Report contains the most up to date information on the condition of wetlands within the survey area. The full report is available and can be found in Appendix L of the Final EIS.	Biological Resources

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				study area. This report represents the best scientific judgement and opinions of the Stantec biologists that conducted the delineation and should be considered preliminary until concurrence has been obtained from the USACE Honolulu District in the form of a Jurisdictional Determination. The USACE Jurisdictional Determination needs to be obtained and the future hydrology of the 22.96 acres of wetlands and 16.25 acres of WOTUS ditches established and considered in the FEIS. The Operational Land-Based DEA should be expanded to a Supplemental EIS and increased operations specific to the lease lands being considered. As with the Pōhakuloa lease consideration, the Navy has had 65 years to complete the required science for this base real estate lease consideration. The Navy should finish their science before applying for long-term leases.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Pōhakuloa are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	
0123	Hope Kallai		23	The FEIS should include consideration of the re-watering of the 22 acres of delineated wetlands and how much water will be required to re-establish suitable habitat for waterbirds, along with the 200 acre REPI grant project, the Open Floodable Space[12] : **3. Open Floodable Space EA** The proposed action is to manage a 200-acre open floodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals. The Ongoing Environmental Reviews at PMRF[13] does not include a timeline for the Floodable Space Project EA and the Kawai'ele Pump Operation and Maintenance EA, but does for the remaining 5 concurrent projects. **3. Open Floodable Space EA** The proposed action is to manage a 200-acre open floodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals. **4. Kawai'ele Pump Operation and Maintenance EA** The Navy proposes to continue operation and maintenance of a pump system on 3 acres of federal land to control water levels and preserve the agricultural viability of surrounding lands within Mana Plain. Both these EA's need to be included for consideration in the FEIS as they determine the dry future of the base and operations and the use of huge modern pumps on old, eroding ditch systems.Again, the Navy should finish their science before applying for long term leases. Climate change is not adequately considered in this DEIS, with climate change flooding impacts expected at PMRF by 2040, not in compliance with the 2024 Department of Defense Climate Adaptation Plan[14] which calls for plans that can sustain for 50 years, not 15. Footnote 12: https://cnrh.cnic.navy.mil/Portals/79/PMRF_Barking_Sands/Documents/PMRFProjectDescriptionsFINAL20250521WEB.pdf?ver=nQfhkxtqWzTA7q_XdFwudw== Footnote 13: https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf Footnote 14: https://www.sustainability.gov/pdfs/dod-2024-cap.pdf	The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As discussed in Past, Present, and Reasonably Foreseeable Future Actions (Section 4.1.5, Introduction to Analysis) in the Final EIS, the Open Floodable Space project is a future project, and therefore, the timeline for this project is currently unknown and next steps will be dependent on funding. If more information regarding future phases of the project is available at the time of the publication of the Final EIS, it will be included in the document. This area is shown in Figure 3.7-6 in the Final EIS. Future maintenance of the Kawai'ele Pump Operation and Maintenance is currently being negotiated; if more information is available at the time that the Final EIS is published, it will also be included in the document. Under the No Action Alternative, the Navy could no longer pay operation and maintenance costs for the Kawai'ele Pump Station (KPS). If the State chooses not to operate KPS, there could be increased surface water levels and flooding of low-lying areas of the Mānā Plain (including flooding of the Kawai'ele Bird Sanctuary) due to the unique hydrology of the area. Flooding of this area could submerge vegetation and decrease nesting and foraging habitat for some wetland-dependent wildlife. This is addressed in Water Resources (Section 3.7.2.4.1, Main Base). In order to support analysis for the BLNR as may be necessary under HEPA, the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS.	Water Resources
0123	Hope Kallai		24	**14. Only the shortest long-term lease should be considered.** Lease term is unspecified, except in the USFWS Biological Opinion which states 50 years. Page 1226, Volume 4 of the DEIS states:	In response to public comments, the duration of the new real estate agreements under Alternative 1 has been clarified to state these would be for a minimum of 25 years and maximum duration as negotiated with DLNR. While the Navy and NASA	Land Use and Access

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				The term of the proposed action is 50 years. A 50 year lease is way too long. Unpredictable changes in technology will have advanced so much in the next 50 years, PMRF may be obsolete within 50 or 65 year lease term.. Right before the last 65-year lease was issued, my family lived on Midway Island. My father was a Navy pilot, and flew a Willy Victor on the DEW Line. That was of paramount importance back then. Now, few nonuniformed folks even know what that means. Sixty-five years from now, missiles may be antiquated and archaic, replaced with lasers from space or technology totally unknown to us now. Or perhaps from underwater. It is also impossible to predict the future depth of the Mānā Swamp groundwater aquifer and how much pumping will be necessary to keep lands contiguous to the base dry. Only the shortest long-term lease should be considered by BLNR, after the Navy completes science and reports. It is not the military's job to control development on the Mānā Plain, the wetlands determine appropriate activities, which may be lo'i kalo and loko i'a not ranching.	considered a shorter duration for new real estate agreements (less than 25 years), the rationale for dismissing this alternative from detailed analysis is included in Section 2.4.3 (Alternatives Considered but Not Carried Forward for Detailed Analysis/Shorter Duration Alternative) of the Final EIS. Please note that the term of the Proposed Action for the 2025 USFWS BO is 10 years, and this information may be found on page 3 of the 2025 USFWS BO in Appendix K of the Final EIS. As discussed in Section 3.7.1.4.1.1 (Water Resources/Main Base) of the Final EIS, the agricultural lands of the Mānā Plain are managed by ADC. With support from KAA and the Navy; DLNR, the County of Kaua'i, and ADC work collaboratively to manage and maintain the network of ditches, canals, drainages, and reservoirs that convey and store water across the Plain. The military does not control development of the Mānā Plain; however, the Navy has developed Enhanced Engagements in the Final EIS. As discussed in Proposed Enhanced Engagements (Section 5.2) of the Final EIS, Enhanced Engagement-5 specifically was designed to establish a Navy-DLNR-DHHL-KAA-ADC-Kaua'i County Working Group to manage water resources in West Kaua'i.	
0123	Hope Kallai		25	**15. Alternatives should be presented in this DEIS for retreat from the shoreline and historic marsh areas as they will soon be wet again.** You can't wage war on the ocean The ocean always wins. Mahalo for your considerations and including my comments in the FEIS. Hope Hamilton Kallai POB 655 Kilauea, HI 96754 lokahipath2@live.com	The Navy is aware of the unique hydrology of the Mānā Plain and understands the challenges associated with water management while considering all stakeholders. The Project is described in Sections 2.1 (Proposed Action) and 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS, which includes new real estate agreements and does not include relocation of facilities. Under either of the three alternatives, there would be no change to operations at PMRF that would change the potential for future sea level rise. However, the Navy and KAA are partnering in an initiative supported by the DoD's Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain. The purpose of the projects is to mitigate impacts of sea level rise, protect and restore native forests within the watershed, and improve water quality in the nearshore environment of West Kaua'i. This area is shown in Figure 3.7-6 in the Final EIS. Thank you for your thorough review of the Draft EIS. To remain engaged in PMRF involvement, please sign up for the PMRF Kaua'i Newsletter (https://pmrfkauai.com/).	Land Use and Access
0124	Laurie Atienza		1	I do not support the proposal. The US military does not act responsibly with respect the land that they already occupy. The have not cleaned up land on Kaho'olawe and O'ahu that was used for military practice and I have concerns about environmental impacts, cultural preservation, and the rights of Native Hawaiians. Thank you.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and military activities and respect your concerns related to other military installations. However, impacts at Kaho'olawe and O'ahu are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) of the Final EIS includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation. Also, a discussion of effects to cultural practices is included in the Final EIS in Section 3.3 (Cultural Practices).	General Opposition

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0125	Kawailani Fifita		1	BIG NO !!!	The Navy and NASA thank you for your participation in the EIS process and note your opposition to the Proposed Action.	General Opposition
0126	Enrico Atienza		1	The Navy has not demonstrated responsible stewardship of land in HI alreay occupied and should not be granted additional land in the State.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) of the Final EIS includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation.	General Opposition
0127	Michelle Ma		1	Oppose.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition
0128	Aya Mack		1	• Adopt non-explosive, simulated training to protect marine ecosystems and reduce environmental damage consistent with NOAA Marine Mammal Protection Act guidance. Assess decades of accumulated impacts on marine mammals, fisheries, and habitats, require long-term, independent monitoring rather than short-term studies. • Protect water resources annual groundwater modeling and drinking water safety assessments in compliance with Hawai'i Constitution Article XI, Section 7. •Monthly independent water quality testing at all ephemeral and perennial streams flowing to the ocean. •Mitigate habitat fragmentation from road and facility construction. Evaluate coastal facility viability under sea level rise and climate change projections per HRS §225P-3 & §225P-4. • Honor public trust and Native Hawaiian rights (Ka Pa'akai precedent, Hawai'i Constitution Article XII, Section 7) with full consultation and cultural impact analysis. •Fuel Tanks Pose Serious Risks. PMRF stores over 350,000 gallons of fuel in aging tanks across the base, including 9 tanks holding 50,000 gallons each. The DEIS does not provide a full inventory of fuel storage or any recent soil and groundwater test results even after the catastrophic Red Hill leak.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Please see responses below that address your specific concerns: 1) The Proposed Action is described in Chapter 2 of the Final EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1 (Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2, Alternatives Carried Forward for Detailed Analysis/Alternative 2: Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds) of the Final EIS. Neither action alternative includes additional development or change in current uses, to include testing and training. Table 1-5 of the Final EIS provides a comprehensive list of previous environmental documents reviewed in preparation of the Final EIS to include resource topics analyzed and Table 3.1-4 of the Final EIS presents a comprehensive list of all relevant past environmental documents at PMRF and KPGO and summarizes key issues. 2) As discussed in Section 3.7 (Water Resources) of the Final EIS, water quality monitoring programs are conducted at PMRF to test for the presence of contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Mānā Water Well) of the Water Resource section in the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents. 3) As noted in Water Resources (Section 3.7.1.4.2.6, Surface Water Quality) of the Final EIS, the Navy has cooperated with Agribusiness Development Corporation (ADC) to conduct surface water quality throughout the Mānā Plain and works closely with partners involved in the current water quality monitoring project. The State of Hawai'i ADC has conducted various forms of water quality monitoring at the pump stations and throughout the Plain for over two decades with a particular focus on the agricultural drainage ditches and upland input, including three ocean outfalls located on Navy fee simple land (see Figure 3.7-4 of the Final EIS). If you would like to learn more about this monitoring program, or want to see the test results, all ADC Mānā Plain water quality monitoring data since September 2020 is publicly available on the ADC website (https://dbedt.hawaii.gov/adc/manaplain/).	Ongoing Activities

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					4) Alternative 1 and 2 of the Proposed Action do not involve construction, renovation, or demolition of facilities, as discussed in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS. 5) In order to support analysis for the Board of Land and Natural Resources as may be necessary under HEPA (Hawai'i Revised Statutes Chapter 343), the EIS includes a discussion of natural hazards in environmentally sensitive areas. Section 3.1.2 (Introduction to the Affected Environment and Environmental Consequences/Predictable Environmental Trends) of the Final EIS introduces predictable environmental trends (including sea level rise) and includes a map showing the 3.2-foot sea level rise scenario in the Project Area. Also, the potential influence of these trends are discussed in each resource section of the Final EIS. 6) Section 3.3 (Cultural Practices) of the Final EIS summarizes the cultural impacts based on information shared during consultation for the Cultural Impact Assessment (CIA). The full CIA report can be found in Appendix F. The CIA covers information shared with Navy and NASA about cultural resources and practices in the western portion of the ahupua'a of Waimea in the district of Kona on Kaua'i, extending from Kalalau Valley in the north to Kekaha Town in the south, and roughly from Waimea Canyon in the east and across Mānā Plain to the nearshore waters in the west. The CIA was conducted according to the 1997 CIA Guidelines. An additional summary of cultural impacts answering the three-part Ka Pa'akai analysis framework is presented in Section 3.3.2.5 (Cultural Practices/Ka Pa'akai Analysis) of the Final EIS for the convenience of the Department of Land and Natural Resources so that they can conduct their required Ka Pa'akai analysis. For more information on the consultation conducted with Native Hawaiians for the Final EIS, please see Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) and the CIA report in Appendix F of the Final EIS. The Navy and NASA recognize that HRS Chapter 225P-3 established Hawai'i's climate change mitigation and adaptation commission and HRS Chapter 225P-4 established the greenhouse gas sequestration task force. 7) The Final EIS discloses general fuel tank locations (exact location cannot be provided for security reasons) and provides an extensive discussion on drinking water monitoring conducted at PMRF. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment) of the Final EIS. The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. There are no 50,000-gallon fuel storage tanks located on leasehold and easement lands at PMRF or KPGO. As discussed in more detail in Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS, per State of Hawai'i Department of Health regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all underground storage tanks. All aboveground storage tanks are equipped with a secondary containment device (i.e., steel basin, double-walled steel tank) and all underground tanks are equipped with advanced leak detection systems. Risk assessments are conducted for all storage tanks at PMRF by a third-party environmental engineering firm every two years. Please see the final EIS for more information.	

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					Fuel storage tanks located on fee simple land are not analyzed in this EIS; however, aboveground storage tanks and underground storage tanks on fee simple land are disclosed in the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1.1.1.6 of that document, which is publicly available, and can be found on the EIS website (www.pmrf-kpgo-eis.com).	
0128	Aya Mack		2	Technology now allows for high-fidelity simulated training that eliminates the need for live explosives in or near sensitive marine areas. These alternatives could consolidate site operations, reducing environmental damage but maintaining training readiness. The EIS must evaluate non-explosive training alternatives that protect marine mammals, reef systems, and fisheries, in alignment with NOAA Marine Mammal Protection Act guidance, and reduce the risk of chronic acoustic disturbance in protected waters. The EIS must also address decades of accumulated impacts from testing and training activities. Current data collection is limited, and short-term, isolated studies cannot adequately assess chronic impacts to sea life — particularly humpback whales and Hawaiian monk seals, which require long-term, independent monitoring. Our water resources are dwindling we need to protect our natural resources before they are all gone.	The Navy and NASA thank you for your suggestions. The Proposed Action does not include changes to training and testing activities at PMRF. Effects from proposed changes to ongoing PMRF activities are analyzed in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) and the 2025 PMRF Land-Based Training and Testing Final (LBTT) EA. Additionally, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on marine resources and discusses simulated training at PMRF in Section 2.4.1.3 of that document. These documents describe the mitigation measures already in place to reduce adverse effects from these activities.	Ongoing Activities
0129	Stephenie Blakemore		1	I have reviewed the EIS, and heard testimony from US citizens who have an ancient as well as cherished childhood connections to the lands in question. The heavy environmental toll on the both the ocean and land due to military presence is not adequately addressed. Cultural practices and history are also being ignored. There has to be a better way to provide the military with a secure place of operations and also recognize the need for cultural and environmental protections, which go hand and hand as part of who they are for those US citizens with deep Hawaiian roots. Address the impact of large aircraft taking off and landing on the runways as it impacts the birds and other wildlife who have few places left to thrive on Kaua'i. Address the impact on the health of the ocean and its aquatic residents. Address the safe access to cultural sites, that include fishing and gathering practices, as well as honoring gravesites. Listen to the testimony from those who have been here as the descendants of a long line of native Hawaiians who lived here for centuries. Good solutions can and must be be found so that the Navy and NASA can be better guests, working in collaboration with those who made these lands their home first. Mahalo	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns regarding impacts to the land and ocean that could be affected by operations at PMRF. The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawai'i Revised Statutes Chapter 343) and National Environmental Policy Act (NEPA). Discussion of Cultural Practices and access to PMRF and KPGO to conduct them, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. Effects to terrestrial resources from the Proposed Action are described in detail by location in Section 3.4.2 (Biological Resources/Environmental Consequences) in the Final EIS. Effects to birds from the Navy's aircraft activities were analyzed in previous NEPA documents and are summarized in Table 3.1-4 of the Final EIS and are discussed in detail in the 2025 PMRF Land-Based Training and Testing Final EA. This document is publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025	Ongoing Activities

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					HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. The Navy and NASA are presenting Enhanced Engagements, which are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-4 discusses the development and continuation of PMRF Kaua'i which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders.	
0130	Tia Marie Namahana Masaniai-Estrera		1	Aloha. My name is Tia Marie Namahana Masaniai Estrera, a Kanaka Maoli. I'm mo'opuna of Ko Hawai'i Pae 'āina. I'm also with E Ola Kākou Hawai'i and Hawai'i Peace and Justice, but I'm speaking as an individual tonight. This draft EIS is not valid and I believe should be withdrawn. The U.S. Navy does not hold title to these lands. These are crown unceded lands, lands held in trust, and the Navy has no lawful authority to build, expand, or operate on them.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to the analysis. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA.	Land Use and Access
0130	Tia Marie Namahana Masaniai-Estrera		2	Under your own U.S. Code Title 10, Section 2684a, Section 113, Section 2808, these actions also violate international treaties that the U.S. is bound by Geneva, UNDRIP, and the laws of occupation. All of them prohibit building, expanding, or altering lands taken by force or fraud.	Thank you for your comment. The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS.	Land Use and Access
0130	Tia Marie Namahana Masaniai-Estrera		3	This draft EIS also violates Hawai'i law and federal environmental law. So I'd like to ask is there a legal representative in the room tonight? Okay. Well, I'd also like to talk about what was said at the start of this meeting about the U.S. warships that are being targeted and why we need these defense systems. And I believe the truth is that the U.S. military has historically been the aggressor worldwide. They have a budget of over $850 billion which is growing, more than China, Russia, and India combined. So who is really the bad guy? The U.S. military is also the largest polluter on the planet. These weapons that are being tested and built at PMFR [sic], they end up being used on native peoples just like us in places like Palestine where we've witnessed absolute hewa. This is not defense. It's an extraction, desecration, and violence funded by propaganda and justified through fear. The military cannot legally proceed when the land is held in trust and the beneficiaries weren't consulted when the land was under dispute and when consent came from illegitimate governments. We did not consent, our kupuna did not consent, and the 'āina itself does not consent. This EIS is a violation of law, a violation of trust, and a violation of truth. I implore you to withdraw it immediately. Mahalo nui.	The Navy complies with federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS. The Navy and NASA also note your opposition to military activities. Additional text has been added in the Final EIS clarifying that effects from the No Action Alternative are unknown and may be subject to additional future analysis, consultations, documentation, and environmental reviews.	General Opposition
0131	Nakai'elua Villatora		1	I am a Hawai'i lina (phonetic) and heir legacy of Ko Pae 'āina Hawai'i , the 'āina, the land that you folks claim as being a part of the United States of America. So my testimony on the record is that there should be no expansion of the lease or renewal of the lease for the U.S. Navy and NASA because, like my previous hoa who had testified, this 'āina was taken by the U.S. in force.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your preference for the No Action Alternative is noted.	Land Use and Access
0131	Nakai'elua Villatora		2	And as you stated inside your presentation, the 'āina especially in the Mānā, the Nohili area, was in Crown Lands. Crown Lands, all the lands that were divvied up into crown, government, kuleana 'āina, they were already created in trust. And if anybody understands trust, and if you look at the deed itself, it said "allodial." Allodial means true and in perpetuity, everlasting. It does not ever change. So the fact that we have to have this continued narration that the U.S. military has some -- some kind of authority over whether or not these lands should be held -- yes, you guys have this assumption that if you guys don't take on the, quote, unquote, "kuleana," because I heard that word a lot today but, really, kuleana is not just responsibility. It's more than that. And through what we had experienced here in	The State of Hawai'i Board of Land and Natural Resources is the approving agency and as such, issues an approval of the EIS prior to considering the issuance of the leases and easements (Hawai'i Administrative Rules [HAR] section 11-200.1-2, 11-200.1-7(c)). At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Land Use and Access

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				Hawaii, what my -- what most kanakas, kupunas have witnessed and felt through generational trauma here is that it will always continue if the U.S. has presence in Hawai‘i and has their grip on top of this ‘āina and the kumu waiwai.		
0131	Nakai‘elua Villatora		3	Also, another thing, we -- we always have this, like, mentality of, like, if we don't show up to these things, we -- we won't be heard. And it almost is, like, kind of a losing game for us kanakas because, no matter what, they will always end up having, you know, numbers like this, that we're outnumbered in our own land. We have to be -- we have to be -- put to live with that kind of trauma. And last -- last thing because, obviously, I'm going to have my comments sent in and e-mailed in is that ho'iho'i ‘āina, land back.	The Navy and NASA note your opposition to the Proposed Action. Thank you for your comments and your participation.	Cultural Practices
0132	Healani Sonoda-Pale		1	Okay. Well, my name is Healani Sonoda-Pale. I submit this testimony as a citizen of Ka Lāhui Hawai‘i and a spokesperson and a lineal descendant of Mānā, Hawai‘i. I stand in firm opposition to the Pacific Missile Range Facility and Koke'e Park Geophysical Observatory real estate draft environmental impact statement as prepared by the U.S. Navy and NASA. This testimony draws directly from the DEIS itself which I have reviewed and reflects documented gaps, omissions, and misleading assertions within that document. Okay.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your concerns regarding the efficacy of the EIS are noted. The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawai‘i Revised Statutes Chapter 343) and National Environmental Policy Act (NEPA).	EIS Process
0132	Healani Sonoda-Pale		2	So, number one, the failure to address PFAS contamination and fuel storage risks. The DEIS acknowledges that PFAS contamination has been documented at PMRF since the 1960s, specifically from fire-training areas, yet the DEIS provides no current groundwater or soil testing results, no time line for cleanup, and no binding commitments to remediation. This is unacceptable.	Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai‘i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	Hazardous Materials and Waste
0132	Healani Sonoda-Pale		3	Additionally, the DEIS lists numerous underground storage tanks and above ground storage tanks across PMRF, including at least nine 50,000-gallon underground tanks and several other tanks of undetermined volume holding hazardous waste. Despite these risks, the Navy states that it could only clean up lands in the event the leases expire and -- you know, leaving the Kaua'i people vulnerable.	All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment) of the Final EIS. The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. There are no 50,000-gallon fuel storage tanks located on leasehold and easement lands at PMRF or KPGO.	Hazardous Materials and Waste
0132	Healani Sonoda-Pale		4	And so Red Hill, I want to just go -- switch over to that. Okay. So Red Hill, I'm an O'ahu water protector. All of us remember what happened here on O'ahu. We cannot forget how the Navy poisoned 93,000 residents, lied about it, and tried to cover it up. And then it took the community to galvanize and organize in order for them to shut down the Red Hill facility which was poisoning our aquifer, our land, and our people. So let us not forget Red Hill. Okay.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	Hazardous Materials and Waste
0132	Healani Sonoda-Pale		5	Next comment I want to make is about the fragmented and misleading impact assessment. The DEIS improperly fragments its environmental review. It excludes major portions of the PMRF's total operational footprint, notably the marine impacts associated with missile launches, live-fire exercises, and sonar use. RIMPAC-related activities hosted at PMRF are not included at all in the DEIS, which is absolutely insane. A full cumulative impact of all PMRF facilities need to be done, not	The scope of the Project as defined by the applicants is defined by the area for which the applicants seek real estate agreements with the State of Hawai‘i Board of Land and Natural Resources. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously	Ongoing Activities

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				just those on these state lands or stolen Hawaiian lands. This artificial segmentation violates the intent of this DEIS.	completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Also, please note that leasehold and easement lands are not necessary to conduct biennial Rim of the Pacific (RIMPAC) exercises. Finally, Chapter 4 of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions.	
0132	Healani Sonoda-Pale		6	Incomplete and unbiased alternative analysis. The DEIS presents three alternatives but fails to meaningfully analyze the full consequences of each. Both action alternatives propose continued military control of the new leases or fee simple acquisition without public trust analysis or acknowledgement of Hawaiian Kingdom land rights.	The Navy and NASA hear your concern regarding the analysis of the environmental impacts. The Proposed Action is described in Chapter 2 of the Final EIS, and includes two action alternatives, Alternative 1 which includes securing new real estate agreements (Section 2.3.1, Alternatives Carried Forward for Detailed Analysis/Alternative 1: Succeeding Current Real Estate Agreements) and Alternative 2 which includes fee simple acquisition of current real estate agreements for leaseholds (Section 2.3.2, Alternatives Carried Forward for Detailed Analysis/Alternative 2: Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds). Neither action alternative includes additional development or change in current uses. Action Alternatives were chosen after analyzing if they met the Purpose and Need for the Proposed Action. The No Action Alternative analyzes the scenario in which the State would not re-issue the leases and easements, and the Navy and NASA would no longer utilize those lands.	Action Alternatives
0132	Healani Sonoda-Pale		7	No action alternative is mischaracterized as resulting in significant adverse effects while, in fact, it would open the possibility for demilitarization and restoration of public trust lands to Hawaiian stewardship. Ongoing occupation of Hawaiian Kingdom lands.	Thank you for your comment. The Final EIS has been updated so that the No Action Alternative does not draw significance conclusions for the resources analyzed.	Action Alternatives
0133	Tara Rojas		1	So, aloha. I do have my camera on, by the way. I don't know; it's not showing up there. So I want to just start off with -- I've been listening to what you guys saying and my comments are going to be on that and then add in what other things I had to say. But, first of all, I heard you mention job employment, that your presence there gives job employment, but at what? It's at the expense of the environment. If you -- you talk about personnel and tech training, that you need this space in order to, you know, test out these new tech things that you guys have. But, again, at the expense of the environment.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA hear your concern regarding environmental impacts from operations conducted at PMRF. Under the Proposed Action, there would be no change to current operations. As described in Section 3.6 (Socioeconomics) of the Final EIS, employment at PMRF and KPGO are in the professional, scientific, and technical services industry. Continued operation of PMRF would continue to benefit the island economically by providing employment (approximately 900 personnel) and expenditures of approximately $150 million annually in salaries, contract goods, and services.	Socioeconomics
0133	Tara Rojas		2	You always prefer to -- you know, prefer that military readiness but, again, it's all at the expense of the environment. So you're not upholding your kuleana and then you're not doing what you're saying. Nor for the DEIS nor, you know, for the one that was -- the EIS that was done at like -- the last one was done in 1998. So all of this at the expense of the environment. Yet the expense is too much to clean up ʻāina. You have unexploded ordnances that was ordered by the Supreme Court in Pōhakuloa, you know, (audio difficulty) Army/Navy/Military. The expense is too much to clean up kai. You guys have RABs, like the Remediation Advisory Board, about cleaning up the kai and the effects that it's having on the kai. You guys still haven't cleaned that up. The expense is too much to clean up our wai. Red Hill, as the previous testifier Healani just said, we've been on -- you know, keeping you all accountable and we've	The Navy strives to balance military readiness with long-term resource protection. As discussed in Sections 3.4 (Biological Resources) and 3.2 (Archaeological and Architectural Resources) of the Final EIS, PMRF would continue to provide long-term resource protection through the use of their Integrated Natural Resources Management Plan (INRMP) and Integrated Cultural Resources Management Plan (ICRMP). The INRMP and ICRMP serve as repositories for natural and cultural resource information, provide guidance on how PMRF meets compliance requirements, and set management goals and required actions. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill, Kahoʻolawe, and Pōhakuloa are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	General Opposition

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				been just continually gaslight and we see the lack of accountability and the hiding of the Navy from even the Red Hill meeting. And the -- the clean up, this is not happening and you guys are still insisting on using the water and reopening up those wells. Yeah? And again, yet, the expense is too much to even clean up Kaho'olawe.		
0133	Tara Rojas		3	Again, going back to the unexploded ordnances, you all cracked the water table. And, again, you guys are perpetuating -- or purporting that you guys are for the environment. So you guys are using 'ike to continue to perpetuate harm. You guys are using 'ike to continue to hang onto stolen lands. You guys are using 'ike to continue to ignore demilitarization demands.	There is no unexploded ordnance (UXO) on leasehold or easement lands in the Project Area. Any area where there is a potential for UXO is closed to unauthorized personnel at all times to ensure public health and safety. PMRF works diligently with the community to provide access for Cultural Practices. The Navy and NASA are presenting Enhanced Engagements in the Final EIS, and these are discussed in Chapter 5 and listed in Table 5.2-1. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. PMRF Kaua'i (https://pmrfkauai.com/) will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions.	Hazardous Materials and Waste
0133	Tara Rojas		4	And so when you said our voice matters, what does that mean? So if our voice matters, then clean up. You said to speak up and so let's -- to speak up. So we're saying leave in 2029. You're saying to let you know about data gaps. So your 65 years for $1 lease is up and literally just simply get out, humbly yet firm, go lightly but definitely -- definite. And so last things I want to say to you, again, that first person who is technically by the word in ʻōlelo haole, right, haole, that he says he's in awe of the beauty of the land.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Public comments were received as part of the EIS process. As described in Section 1.5 (Scope of Environmental Analysis) of the Final EIS, the scope of analysis is limited to the Navy and NASA's activities on leaseholds and easement lands. The State of Hawai'i Board of Land and Natural Resources is the approving agency and as such, issues an approval of the EIS prior to considering the issuance of the leases and easements (Hawai'i Administrative Rules section 11-200.1-2, 11-200.1-7(c)). Details regarding lease agreements would be determined in collaboration with relevant parties and shareholders when a final action is carried forward. As described in Section 3.5.2 (Land Use and Access/Environmental Consequences) for Alternatives 1 and 2 in the Final EIS, the U.S. Government would (under these alternatives) enter into new leases and agreements with the State for fair market value of the leasehold and easement lands in the Project Area. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS discusses these negotiations in more detail and the potential steps carried forth under the No Action Alternative.	General Opposition
0134	Cindy Freitas		1	Aloha. E mele komo a e mele aloha o nā kūpuna a i hala. Aloha mai kākou. My name is Cindy Freitas. I'm a Native Hawaiian descendant of the native inhabitants of Hawai'i prior to 1778, born and raised in Hawai'i, and I'm also a cultural practitioner. I am writing to oppose the proposed increase in military training, testing, and bombing exercise on all location as outlined in the draft environmental assessment for the Pacific Missile Range Facility.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition
0134	Cindy Freitas		2	I'm especially concerned about the EA insufficient treatment of culture and historical impacts on all location with deep significant to Native Hawaiians. Although the EA may fulfill minimum legal requirements under the National Environment Policy Act, it fails to fully acknowledge the cultural, spiritual, and historical importance of all -- all location. The assertion that there are no historical properties due to lack of archaeological remains is not a valid justification for the continuation for expansion of destructive -- destructive activities, for all location exists within the living Hawaiian cultural landscape and it deserves more than checkbox-style assessment. Native Hawaiian, our testimonies, spiritual practice, and ancestor connection to this ʻāina are essential components of the cultural significance and must be evaluated	Archaeological and Architectural surveys were conducted for all portions of the Region of Influence (ROI) where the Proposed Action has potential to affect these kinds of resources. The surveys covered all leaseholds and all easements for utilities and roadways in the ROI. Continued use and routine maintenance activities within these areas have potential to affect archaeological and architectural resources. Per discussions with Department of Land and Natural Resources, the proposed restrictive use easement lands were not surveyed because those lands are under the jurisdiction of the Agribusiness Development Corporation, and the proposed easement terms and Navy uses of those lands would not have the potential to affect archaeological and architectural resources. The Cultural Impact Assessment (CIA) covers information shared with Navy and NASA about cultural resources and practices in the western	Archaeological and Architectural Resources

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				through consultation and respect. This -- the requirement under Section 106 of the National Historical Preservation Act and the Executive Order 13007 concerning sacred site.	portion of the ahupua'a of Waimea in the district of Kona on Kaua'i, extending from Kalalau Valley in the north to Kekaha Town in the south, and roughly from Waimea Canyon in the east and across Mānā Plain to the nearshore waters in the west. This is consistent with the 1997 CIA Guidelines. There are no proposed changes to the type or frequency of current land use or access activities occurring on State leasehold and easement lands. For more information on the consultation conducted with Native Hawaiians for the Final EIS, please see Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) and the CIA report in Appendix F in the Final EIS.	
0134	Cindy Freitas		3	Moreover, the restriction -- military access to all location means Native Hawaiians have been historical denied the opportunity to document, access, or steward this place. This lack of access should not be used as an excuse to claim the island holds a cultural value.	As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and Section 3.5 (Land Use and Access) of the Final EIS, the Proposed Action does not change public access at PMRF. The Navy and NASA are developing Enhanced Engagements that will add to the existing protections at PMRF and KPGO. Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs.	Land Use and Access
0134	Cindy Freitas		4	Given the long legacy of military damages to Hawaiian island, mostly nobly Kaho'olawe, it is unacceptable to further militarize and desecrate another sacred island until the Navy engage in genuine good faith consultation with Native Hawaiian organizations and cultural practice -- practitioners.	The Navy and NASA respect your concerns related to other EAs and EISs. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS. Effects to resources on Ka'ula Island from military training were analyzed in the PMRF Land-Based Training and Testing EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. In the Final EIS, Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) summarizes the cultural consultation that was conducted with Native Hawaiians about the Proposed Action, and the CIA found in Appendix F provides more details about those consultations. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Outreach) of the Final EIS describes the Navy's coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. Enhanced Engagement-4 (listed in Table 5.2-1 of the Final EIS), PMRF Kaua'i (https://pmrfkauai.com/), will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions.	Cultural Practices
0134	Cindy Freitas		5	And OHA and Department of Hawaiian Homestead does not speak on my behalf. Conduct a cultural component independent assessment and prioritize -- prioritize cultural preservation over destruction exercise. This propose should be withdrawn in this current form.	Your support for the withdrawal of the Navy and NASA's proposal is noted.	Cultural Practices

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0134	Cindy Freitas		6	And, also, this lands was taken out of the -- the doctrine -- trust doctrine, what was put inside to better the Native Hawaiians. And some of this land, of course the state took it out and give it to the military. This is our crown unceded land and the trust doctrine belongs to the people.	Please see Section 3.5.1.2 (Land Use and Access/Regulatory Setting) of the Final EIS for a discussion of the public land trust as it relates to the Project Area.	Land Use and Access
0135	Manuel Kuloloio		1	Aloha, Ms. Anae. I hope you let me go more than three minutes. Remember I came here last night during the scoping session, and I asked you folks, Are you guys going to allow people to talk? You know, like -- and you said, No; right? Remember? Remember? I'm the guy that told you, Wow, never been to one like that before. So just -- so just put that checkmark. Okay? Captain? Commander? Captain -- is it commander or captain? Captain. I remember sitting in a very tall building in Albuquerque, New Mexico, one of our nation's largest defense contractors whose breadth and depth of foreign policy and domestic policy is pretty heavy. And they said, "Uncle Les, Manny, we want you to look at these diagrams." And when I looked at it, sir, I followed everything and I said, "Uncle Paul, General, I want to go in this building." Little did I know, many years later, I did go into that building. But I want -- how you pronounce your last name? MS. LING: Ling. MR. KULOLOIO:·Ling? You from the Big Island; right? I remember. Where's the NASA wahine? Marcia; right? I remember you last time. I liked your style the last time. You're on it. But I not going give you guys one out. You know why? I hope that when you say you talked to the Aha Moku, you're not going to do the same thing that the U.S. Army did to the Aha Moku. Okay? Got it? Got it, ma'am? Yes or no. Tell me. Because I am the Aha Moku rep for Kaho'olawe.	The Navy and NASA thank you for your comment and appreciate your participation in this EIS process. Consultation with the Aha Moku Council (Kaua'i and State) is ongoing and is highly valued by the Navy and NASA.	General Support
0135	Manuel Kuloloio		2	Captain, you guys need to envision -- two years from now I want to know which of you three is going to be before the Board of Land and Natural Resources. And I hope you don't do a poor performance like the Army did. Am I making sense, Captain? I'm making sense, Captain?	The Navy and NASA respect your concerns related to the Army's EISs. However, impacts at Army installations are outside the jurisdiction and scope of this EIS. Thank you for your participation in this EIS process.	EIS Process
0135	Manuel Kuloloio		3	So to Stantec, Aecom, big bucks they paying. I've never seen an EIS where they -- they redacted the EIS; right? It's redacted; right? Tell me if I'm wrong of the 531 -- 513 acres. Tell me if I'm just making this up. Somebody. And you guys found 12 new sites; right? With International Archaeology; right? MS. ANAE:· And we're still -- MR. KULOLOIO:· No, no. I'm just saying; right? Because I want you to -- Captain, the Navy went teach me. Okay? Because there are brilliant people -- Noe, how are you, Noe? I get one picture in Washington, D.C., with Noe Kalipi and Esther Kia'āina. They smart Hawaiians.	Results from the Archaeological Inventory Survey (AIS) are summarized in Section 3.2 (Archaeological and Architectural Resources) of the Final EIS. The Final EIS includes an AIS updated to be consistent with Hawai'i Revised Statutes Chapter 6E. The redactions are required because the EIS is a combined National Environmental Policy Act/HEPA (Hawai'i Revised Statutes Chapter 343) document. As stated on the cover of the AIS in Appendix F of the Final EIS, "This report has been redacted to prevent disclosure of information about the location, character, or ownership of historic properties that may risk harm to the properties as required by the National Historic Preservation Act (54 USC 307103) and information concerning the nature and location of any archaeological resource for which the excavation or removal requires a permit or other permission as required by the Archaeological Resources Protection Act 16 USC 470bb(1)."	EIS Process
0135	Manuel Kuloloio		4	Captain, you need to think, in two years, everything you heard that went against the U.S. Army, it was a bad -- the worst EIS I've ever seen written. And it was a local company, by the way. Because you never allow me to speak at the scoping session, I'm not going do your homework for you. But you need to think two years ahead, sir. Okay? Navy, you need to hit every bullet that you heard from the protesters. And you know why? Because I'm in this sacred sanctuary, the son of a U.S. Army cryptologist, allowing me	The Navy and NASA respect your concerns related to the Army's EISs. However, impacts at Army installations are outside the jurisdiction and scope of this EIS. In the Final EIS, Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) summarizes the cultural consultation that was conducted with Native Hawaiians about the Proposed Action, and the Cultural Impact Assessment found in Appendix F provides more details about those consultations. Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community	EIS Process

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				to speak because I have been, Captain, in the waters off of Kaua'i. I know what they do, space, airspace, surface, sub. But if I'm -- as a Hawaiian, Ms. Anae, when you got to ask Manny go take the cultural practitioners aboard the Hokule'a to their first travel to Nihoa and then when we coming home with Nainoa Thompson, we decide to ka‘apuni Ka'ula Rock. You do this cultural heavy thing and then you come back and you see the reality. That's the hard part.	Outreach) of the Final EIS describes the Navy’s coordination at PMRF with a diverse array of individuals and organizations. This engagement ensures active and meaningful communication with community stakeholders, fostering collaboration and addressing local concerns effectively. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Enhanced Engagement-4, PMRF Kaua‘i (https://pmrfkauai.com/), will provide a means of providing a proactive method for two-way communication, promoting greater dialogue, working collaboratively toward common goals, and developing solutions. Your support for the withdrawal of the Navy and NASA's proposal is noted.	
0135	Manuel Kuloloio		5	So, Captain, like I told somebody -- I'm not going name that person -- which one of you going be the one, that fat man with the cigar that's going to read this report, ma'am, and say, this is what I want in and this is what I want out. Because one day I may be part of that Board of Land and Natural Resources making that issue decision for you. Am I making sense, ma'am? I'm talking to you because you and I had a long conversation at the scoping meeting. Am I making sense? It is a very special place. I not going tell you how I feel because I had the honor to go inside that building, sir. It was like one huge space control center; right? Whoo.	Comment noted.	EIS Process
0135	Manuel Kuloloio		6	But I want to say you know what I love about this thing is when there was a fire in Hanapēpē not too long ago, you know what I saw, Captain? I saw this Sikorsky helicopter I know came from your base. It was out doing water drops; right? It's about give back, but should be automatic. No need ask; right? So I come from here, Ms. Anae. MS. ANAE: Mahalo. MR. KULOLOIO: You know why I'm telling you. MS. ANAE: I know.	Thank you for recognizing services provided by PMRF. PMRF Crash/Fire provides firefighting services to PMRF and, under a Memorandum of Understanding with the County of Kaua‘i, PMRF Crash/Fire provides firefighting services to the County on non-Department of Defense lands, such as during the fire in Hanapepe.	General Support
0135	Manuel Kuloloio		7	I come from here, and I no lose. But I came here to say you need to start thinking two years from now when you before the Board of Land and Natural Resources because if you disrespect the chairman like how the Army did, I probably might be the guy that say, "Aunty Dawn Chang, no." Captain -- am I making sense, Captain? CAPTAIN PRINCE:· (Nodding head up and down.) MR. KULOLOIO:· That's my challenge to you because the Navy went train me. Okay? Thank you.	Thank you for your comment. The Navy and NASA regularly engage with the Board of Land and Natural Resources, including hosting a monthly Drumbeat call with the Department of Land and Natural Resources. The Navy and NASA respect your concerns related to the Army’s EISs. However, impacts at Army installations are outside the jurisdiction and scope of this EIS.	General Support
0136	Malaki Kauiokapono Kanahue		1	Aloha mai kākou. ‘O Malaki Kauiokaponokalei ‘O ka motupuni o Ni‘ihau. I know you guys no understand. And for those of you that are haole to our home, remember you are visitors and guests in our home. We are kanaka. We never ask you guys to come out here. We never ask you guys come dig up our kupuna in those sand dunes. I know those sand dunes very well. My mother used to work out there. We've been out there. And till today I go out there to Kawai'ele which is right next to PMRF. My lineage directly comes from Nihoa, Ka'ula, and Ni'ihau, all holding the kaiwi 'ahu 'ula bloodline, one of the last pure kanakas that come from Ni'ihau. Our kupuna, if they had a voice today, they would say "A'ole." But it fall on deaf ears, and I hope your guys ear no fall deaf again. And ho'opau lawa; when that lease is pau pau, go home. Clean up your kapulu and go home. You guys have left our ‘āina with mess.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Your opposition to the military presence at PMRF is noted. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS describes the potential steps that would take place if the new real estate agreements for leases and easements are not granted to the Navy and NASA after their expiration. Pursuant to the terms of the current real estate agreements , at the expiration of the leases and easements, any return of State property would involve complex negotiations and collaboration with the State to determine the condition of the returned lands and address clean-up activities.	General Opposition

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				My uncle who lives up Pu'u 'Opae and a few others had to go clean up that mess, mess that you guys no even like acknowledge, mess that you guys leave behind hoping that the kanaka no can go back to the land for live on the land because the land is contaminated. So do your guys' research and when pau pau, clean up and go home. But I stand here for my mo'opuna, my hanauna, my kamali'i because I no like them fall on deaf ears when they got to come and stand up and fight the same fight that our kupunas have fight for how long. So your guys' lease pau pau, go home. Pack up your kapulu, your opala.		
0136	Malaki Kauiokapono Kanahue		2	Ho'oponopono, that word is so deep to us but to you guys, you use 'em like it's nothing. Ho'oponopono, make great with your na'au, your pu'uwai. Give the ʻāina back to the kanaka. The ʻāina is crying for help. You guys don't know. You guys no can feel that because you guys not buried in the land. Your DNA is not buried in the ground that you guys desecrated on. You guys are asking for extend your guys' lease while our kanakas -- I live Hawaiian home right there and I can see all that happens on that area. We pay a dollar a year for 99 years while you guys pay the same dollar for explode all your guys whatever, even on our ʻāina Ka'ula. So as a kanaka, lawa, enough, pau already. Okay? Pau, enough, go home.	The Navy and NASA note your opposition to the Proposed Action. Impacts at Kaʻula Island are outside the jurisdiction and scope of this EIS. Effects to resources on Kaʻula Island from military training were analyzed in the PMRF Land-Based Training and Testing EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	Cultural Practices
0136	Malaki Kauiokapono Kanahue		3	You guys came from somewhere. We from here and we tired of seeing these faces and your guys' choices that you guys making that not going benefit our keiki but going force them out of their own home, either through sickness or through not even being able for afford for live here anymore. Okay? So lawa, pau. Mahalo.	The Navy and NASA note your opposition to the Proposed Action.	Cultural Practices
0137	Shyanne Olores		1	Aloha. My name is Shyanne Olores and I come before you today not just as a testifier but as a descendant of this land of Mānā and Nohili. My family is from here. My late grandmother and grandfather were the last in our ʻohana to live in Mānā town. I was raised fishing and gathering in Nohili. My father and his brothers hunted the (audio difficulty) of Mānā to feed our family. We were fed, raised, and rooted in this ʻāina for generations. We cared for this place and it cared for us.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciate the information you provided about your family lineage. The Navy and NASA respect your concerns regarding military operations and cultural practices. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	General Opposition
0137	Shyanne Olores		2	The dunes of Nohili hold the bones of our ancestors. I used to visit them but now we're locked out. We're shut off from our own family, our history, and our burial grounds all because of the greed, negligence, and violence of the United States military.	As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapuaʻa Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and Section 3.5 (Land Use and Access) of the Final EIS, the Proposed Action does not change public access at PMRF. The Navy and NASA are presenting Enhanced Engagements under the action alternatives that propose additional property Management protections for the ʻāina. These are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs.	Land Use and Access
0137	Shyanne Olores		3	Let me be clear. This is not America. PMRF sits on stolen Hawaiian land and the overthrow of the Hawaiian Kingdom was illegal. The United States has no rightful	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent	Land Use and Access

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				claim to this ʻāina. The Navy is not just occupying land. It's occupying our identity, our history, our sovereignty. And now the military wants to renew a lease it never had the moral authority to hold in the first place.	with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	
0137	Shyanne Olores		4	This draft EIS is incomplete and insulting. It ignores the true mauka-to-makai impacts. It dismisses the harm of missile launches, rocket fuel, amphibious assaults, and ocean war games. It erases the voices of the very people who know and love this land the best.	Rocket fuel, amphibious assaults, and ocean war games are not included in the Proposed Action analyzed by this EIS. Launching operations are discussed in Public Health and Safety (Section 3.9) of the Final EIS. The Navy and NASA respect your concerns about addressing PMRF from mauka to makai. The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA and NEPA. The Navy and NASA note your concern about impacts outside of the Proposed Action. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0137	Shyanne Olores		5	The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide a complete list or recent testing results, just like Red Hill. This is a ticking time bomb.	The EIS discloses general fuel tank locations (exact location cannot be provided for security reasons) and provides an extensive discussion on drinking water monitoring conducted at PMRF. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment) of the Final EIS. The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. Fuel storage tanks located on fee simple land are not analyzed in this EIS; however, aboveground storage tanks and underground storage tanks on fee simple land are disclosed in the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1.1.1.6 of that document, which is publicly available, and can be found on the EIS website (www.pmrf-kpgo-eis.com). Water quality monitoring programs are conducted at PMRF to test for the presence of per and polyfluoroalkyl substances (PFAS) and other contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Mānā Water Well) of the Water Resource section of the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is safe to drink. These reports are publicly available on the website at https://pmrf-kpgo-eis.com/documents.	Hazardous Materials and Waste
0137	Shyanne Olores		6	PFAS, cancer-causing forever chemicals, were found in the soil and groundwater back in the 1960s. It's now 2025 and still no cleanup. The Navy simply says remediation is forthcoming. That is not accountability. That is environmental violence.	The Navy and NASA respect your concerns related to cancer-causing chemicals. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawaiʻi Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site	Hazardous Materials and Waste

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					Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	
0137	Shyanne Olores		7	And let's talk about RIMPAC, the world's largest war game, hosted right here on our shores. The DEIS fails to even mention it. No assessment of the destruction, the noise, the risk, or the cultural desecration. PMRF trains militaries from 29 countries, testing weapons used to fuel wars and genocides across the globe. And it all happens on our stolen land.	The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0137	Shyanne Olores		8	This is not just about military expansion, it is about continued genocide -- all of our people, all of our ecosystems -- of our history. The U.S. military does not protect Hawaii. It exploits it. So today I call for this: Clean up your toxic mess, restore our sacred places, and return the land to its rightful stewards, Kanaka Maoli. We do not consent; we never have. PMRF does not belong to the U.S. Navy. It belongs to our ancestors and the generations yet to come. This is not America. This is stolen land. Give it back.	The Navy and NASA note your opposition to the military's presence at PMRF.	Land Use and Access
0138	Alfred Keaka Hiona Medeiros		1	Mahalo for your guys' time for giving oral comment or a brief testimony on why no continued leases should happen for any military branches. What more have to be done to Hawaii? How much more desecration? How much more displacement does the U.S. military have to do to our people here? You know, I speak from a son of one of the first Kanaka Maoli Navy SEALs, my dad, Lawrence Hiona, you know, who was subjected to racism for being a different color shade of skin in his own home of Hawaii, right, to have fought bravely for a country that he believed in that was for the people, that was for the protection of the people. And when he got older, he realized that they haven't been there for the people. It wasn't there for him. As a VA, it wasn't there for him at all as a veteran that served years, you know, in Vietnam fighting a BS war. You know, if he was still alive, he would tell you that himself. "It was a BS war." They took our young Kanaka Maoli, young Hawaiians to war to fight their battles that was not fair. And we continue to do the same thing, but you guys shouldn't be doing that here in our home of Hawaii.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA appreciate your family's military service and important part of your family's story.	General Opposition
0138	Alfred Keaka Hiona Medeiros		2	We look at what happened to Pōhakuloa. We look at what happened to Mākua. I'm from Waiʻanae; I live Waiʻanae. We hear the bombs going off over Waiʻanae Uka; right? Schofield, the base over there desecrating our land. You know, we can see when the rockets are set off over there in Kaua'i; right? You guys are doing the test or whatever it is. Enough is enough. You know, if our ʻāina could say something, they would tell you to go home. This is not your place to test and destroy the land that gives life. How much more will you guys have to do?	The Navy and NASA respect your concerns related to other military installations. However, impacts at Pōhakuloa and Mākua are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	General Opposition

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0138	Alfred Keaka Hiona Medeiros		3	(Audio difficulty) Red Hill, like, you guys, Navy, poison our water. You know, it's not only in one area. That's the heart of Oʻahu, of our aquifer. It spreads east to west, from Maunalua to Waiʻanae. It's only a matter of time where we'll be drinking fuel and PFAS through every water course in Hawaiʻi. And it's all due to the negligence and the disrespect from the U.S. military. Doesn't matter what branch it is because you're all the same.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. As discussed in Water Resources (Section 3.7.1.4.1.2, Mānā Water Well) in the Final EIS, groundwater is pumped at the Mānā Well, and daily water quality monitoring is performed at five established test stations throughout the water distribution system to test for sudden or gradual changes in water parameters. The Department of Defense has exceeded current U.S. Environmental Protection Agency guidance and proactively implemented policies to monitor drinking water for per- and polyfluoroalkyl substances at all service owned and operated water systems at a minimum of every 2 years. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, the drinking water at PMRF is safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Public Health and Safety
0138	Alfred Keaka Hiona Medeiros		4	You know, it's kind of unfortunate to have to do this. We have to always come out to these meetings. We have to give these oral testimonies whether it's online or in person, give written testimony. And I just hope that you guys are listening to the people of this land when we say enough is enough. No more. No more new leases, no more extended leases, no more destroying of our home, no more desecrating of our home. Let our home live. Let it breathe.	The Navy and NASA respect your concerns in the EIS process and note your opposition to the Proposed Action. Public input is an important part of every environmental review process. It is requirement of State and federal environmental law that each government action identify the appropriate level of environmental review for that specific action. For each action where an EA or EIS is identified as the appropriate level of review, it is required by Chapter 343, Hawaiʻi Revised Statutes, that public input be sought for that specific action. As required by Hawaiʻi Administrative Rules section 11-200.1-26 and 11-200.1-27, all public comments received during the comment review period have been considered and responded to, and are included in the Final EIS.	EIS Process
0138	Alfred Keaka Hiona Medeiros		5	I'm a part of a non-profit called Kuleana Ka ʻāina and our whole goal is to preserve this land that gives us live. So we got to do what we got to do. If that means fight against you guys' military, then we will do that as well, but it would be better to put farmers back on the land where the U.S. military is occupying illegally and put our people to restore it to what it once was before. Mahalo nui for your guys' time and I'm sorry if I come off this way but this what I come off every single time when we got to step into these rooms and tell you guys over and over again, enough is enough, pack your [expletive deleted] up and get the [expletive deleted] out.	Thank you for your comment. Your opposition to the military is noted. Alternative 3: No Action Alternative (Section 2.3.3, Alternatives Carried Forward for Detailed Analysis) in the Final EIS analyzes the scenario where no new real estate agreements would be signed between the State and Navy and NASA in these locations. Under this scenario, future uses including farming could occur in these areas depending on how the State decides to manage these lands. Current restoration projects in the Project Area include restoration of the Mānā Plain to wetlands (Table 4.1-1 of the Final EIS) and native outplanting restoration efforts (Section 3.4.1 of the Final EIS, Biological Resources/Affected Environment). These activities are also described in Section 4.1.2 of the 2023 PMRF Integrated Natural Resources Management Plan in Appendix K of the Final EIS.	EIS Process
0139	Kaimana Kinzie		1	Awesome. First of all, aloha mai kākou to everybody and thank you all for holding this meeting. My name is Kaimana Kinzie, resident of Anahola here on Kaua'i. I did submit some written comments and I want to just read a section of that comment to maybe give everyone a better understanding as to where some of the protests is coming from in relationship to the term "ceded lands." So in Volume I, Section 3.5.1.4, a History of Ceded Lands, the DEIS explains that the U.S. annexed the Hawaiian islands via joint resolution of Congress and that Hawaiian territory was then ceded to the U.S. However, as the Navy and the U.S. government are aware, the Newlands Resolution, which was the joint resolution mentioned there in 1898, was a workaround to an unsuccessful treaty (audio difficulty) that was not only unilateral in nature but contrary to the wishes of the Hawaiian population as is evident in the 1897 Ku'e Petitions.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your opposition to all three alternatives is noted. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. Thank you for adding this additional context and historical perspective. The Navy and NASA have noted this information, although page limitations prevent us from adding it to the Final EIS.	Land Use and Access

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				In other words, the U.S. passed a bill attempting to acquire foreign territory without a formal agreement, just generally embodied in the treaty between it and the independent state of the Hawaiian Kingdom. So in this case, extra -- extraterritorial laws were applied to the effectiveness and limits of said bill and are viewed as an unconventional, if not illegal, process to acquiring sovereign territories through the lens of international law. And it's that scope that I feel has been missing, or you'll hear these trigger words like "occupation," "ceded lands," et cetera, but what does it all mean in the context of historical events; right? So one might say that in this case we're putting the cart before the horse; right? It's assumed that land has been ceded to the United States government which, again, would imply a treaty of cession which doesn't exist. And, again, the Ku'e Petitions which made its way to Congress and blocked the second treaty attempt to annex Hawai‘i is the evidence of the resistance by the population. And I want to be clear that it's not strictly a Native Hawaiian populace that was against this very crucial point to arguing who owns and has rights to this land being contested in the DEIS. It is simply the business of whoever was the Hawaiian subject at the time, be they Native Hawaiian or otherwise. So, again, mahalo for your guys' time, and my testimony is submitted in written form as well.		
0140	Tara Rojas		1	So got to confess that this is what I wanted to finish with, that we are tired -- and mahalo nui for the previous testifier. Everything he said, put that into your guys's DEIS because that is facts. And with that being said, that's why we're tired of hearing your guys' words (audio difficulty) words of "we're dealing with" or "we're going to have" or "we're talking about" enhanced management efforts. Just big words, you know? Mitigation, that they adhere to national and state environmental acts, and that this scoping process, you know, that you read every (audio difficulty) six to seven times over the last year, 2024.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) of the Final EIS includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation.	EIS Process
0140	Tara Rojas		2	And then, you know, the BLNR, the process and the interviews of 13 interviewees and Aha Moku counsel, as another previous testifier said, everyone is giving mana'o, especially those who are Kanaka ‘Ōiwi, Kanaka Maoli, and cultural practitioners. These are the words and the consultation that you need to listen to because these are the gaps that you guys are missing.	Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the Cultural Impact Assessment (CIA) report found in Appendix F of the Final EIS, including details about the consultation process and the groups and individuals who were consulted. Public comments were also considered while preparing the Final EIS.	Cultural Practices
0140	Tara Rojas		3	So you're saying that you, again, are in awe of -- in beauty of the land these past two months. Now can you imagine Kanaka Maoli in awe of the beauty of the land (audio difficulty) so the fact that since the 1960s when PFAS -- one other previous testifier mentioned that PFAS was detected. That was 65 years ago. PFAS are forever.	Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai‘i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	Hazardous Materials and Waste

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0140	Tara Rojas		4	Then in 1998, the last EIS, that was 27 years ago. Changes happen in just a year. So can you imagine 27 years ago? And, again, the Navy, the poisoning our water and turning Pearl Harbor into a Superfund site. That was the most abundant place in Oʻahu. Kaho'olawe as well, loaded with unexploded ordnances. That came up. The water table cracked. And, you know, (audio difficulty) on the land.	Table 1-5 of the Final EIS includes a comprehensive list of previous National Environmental Policy Act documents related to PMRF; these documents range from the years 1990 to 2024. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill and Kahoʻolawe are outside the jurisdiction and scope of this EIS.	Ongoing Activities
0140	Tara Rojas		5	And I saw on the ARCH exhibit of a photographer that went and documented how you all thought it was unsafe for the -- the people, the kanaka there to clean up to be there so you airlifted them out. It's at the Hawaiʻi Museum of Art. The Army with their bombs and depleted uranium and just the contamination of Pōhakuloa, Mākua, Kahuku; and the Marines spread the contamination. So lead contamination here in ʻEwa Beach makai.	Thank you for providing details on the ARCH exhibit at the Hawaiʻi Museum of Art. The Navy and NASA respect your concerns related to other military installations. However, impacts at Pōhakuloa, Mākua, Kahuku, and Puʻuloa are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	Hazardous Materials and Waste
0140	Tara Rojas		6	So all in all to say, people testifying that this is their kanaka cultural practitioners and the people who are allied, we are not liaisons nor bought out nor employed by the military. So just keep in mind that cultural consulting companies, you know, under -- under the guise of cultural consultation, they're pushing things that are harmful to the environment, like ocean turbines, Army lease extensions, and now the DEIS. So, please, again, just clean that up, leave, and go. And let the kanaka from Ni'ihau -- when the lease is up, pau, clean up, and go. Mahalo.	In the Final EIS, Section 3.3.2 summarizes the information shared with the Navy and NASA about cultural resources and practices in the Project Area. More details are available in the CIA report found in Appendix F of the Final EIS, including details about the consultation process and the groups and individuals who were consulted. The Navy and NASA note your opposition to the Proposed Action.	Cultural Practices
0141	Healani Sonoda-Pale		1	Aloha. I going be short. Okay. So I just wanted to kind of finish up my -- my testimony, but the continued use of these Hawaiian crown and government lands that were illegally seized after the overthrow of the Hawaiian Kingdom, these lands were never ceded or -- nor relinquished by Kanaka Maoli without -- and their continued use without our free, prior, and informed consent violates international human rights standards under the U.N. declaration and UNDRIP.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0141	Healani Sonoda-Pale		2	And I also want to point out to anybody who is not aware that the weapons that are tested and are on -- at the PMRF, they're tested at the RIMPAC and, you know, these missiles that are being used, these are weapons that are sold and given to other countries like Israel to commit horrendous, heinous crimes against humanity. So we're not just talking about Hawaiʻi now. We're talking about globally what -- what the continued occupation of U.S. military here in Kaua'i really means in terms of global peace and global warming because, yes, the U.S. military is the biggest institutional polluter in the world.	Your opposition to military activities outside the Proposed Action is noted. Accordingly, the Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0141	Healani Sonoda-Pale		3	But I also want to say that this EIS is incomplete and insufficient because it does not address the PMRF from mauka to makai. It doesn't look at all the impacts; it's just looking specifically at the -- the leased lands. And this is unacceptable because the impacts are from mauka to makai.	Thank you for your comment. The Navy and NASA respect your concerns about addressing PMRF from mauka to makai. The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawaiʻi Revised Statutes	Biological Resources

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					Chapter 343) and National Environmental Policy Act (NEPA). The Navy and NASA understand your concern about impacts outside of the Proposed Action. Effects to marine resources were analyzed in previous PMRF NEPA documents and are presented in Table 1-5 of the Final EIS. These documents incorporate mitigation measures in place to reduce adverse effects. The 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on marine resources and is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0141	Healani Sonoda-Pale		4	And I know that you folks also lease 7,000 acres of under -- underwater lands. And that should be included as well, as well as Ka'ula Island. And I just wanted just to share that. Mahalo.	The Navy and NASA respect your concerns related to submerged lands. Submerged lands, as described in Section 1.1 (Project Introduction and Overview) of the Final EIS, are not included in the area of analysis for the EIS because the Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy will continue to use this area pursuant to the retained rights in, and powers of regulation and control of, such land by the United States for constitutional purposes as codified in the U.S. Constitution, Article I, Section 8, Clause 3; Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq.; and the Hawai'i Admissions Act, 48 U.S.C. section 5(i). The Navy's use of submerged lands within the ROW area will remain consistent with current usage for navigation and national defense purposes (i.e., for underwater cables supporting at-sea training ranges). The Navy will continue to comply with applicable laws with associated notification requirements to the State as to these submerged lands. If the Navy's use of this area significantly changes, the Navy will take appropriate actions in accordance with NEPA, and inform other stakeholders as appropriate. Impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the 2025 PMRF Land-Based Training and Testing EA. A link to that document can be found in Table 1-5 of the Final EIS. More information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	Biological Resources
0141	Healani Sonoda-Pale		5	And I agree with the last two testifiers, everything that they said, especially about the fact that you guys got your facts wrong in the DEIS, that we were never annexed and these lands were stolen and never ceded. Thank you.	The Navy and NASA thank you for your comment and appreciate your participation. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0142	Tara Rojas		1	Aloha. Yeah. I have a question before my last comment. You know, it says from 5 to 8 but (audio difficulty) and, again, you know, from 5 to 8, but technically it didn't start until 6 to 8. So maybe you can address that after the last lineup. So my last line I just want to say is that, you know, when you get one scab and you keep picking at it, yeah, what's going to happen? It keeps bleeding and it doesn't heal; right? So when you think about these last 65 years -- and since the 132 years of this unlawful, illegal overthrow that, again, the Hawaiian Kingdom still exists and has never been annexed. So the military being here, literally, is a disease, a disease, a scab that's continuously picked, and it's a disease that Hawai'i needs to heal from forever. 65 years for a $1 lease is up. Stop picking the scab. Just like how you disinfect -- you have a cut that hurt, clean up the area before you leave so that Hawai'i and kanaka and the 'āina and the wai and the kai and the air and the whole legal system here that you all (audio difficulty) so that it can heal. You're going to leave, in a nutshell. That's what it is.· Demilitarize Hawai'i, give the	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your preference for the No-Action Alternative is noted.	Land Use and Access

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				land back so that Hawai'i can heal because military is a disease that Hawai'i needs to heal from forever. So I'm for alternative three: Land back, clean up, and leave. Mahalo.		
0143	Kaimana Kinzie		1	Aloha again. My apologies. I realized just now that I didn't give you my position on the three alternatives that the DEIS lays out. So jumping off of my previous comments, I actually object to all three alternatives presented in the DEIS until such time that the terminology therein is changed to more accurately represent the status of the lands in question. In fact, I would suggest removing the term "ceded lands" and replace it with the term "seized" or "occupied lands." This would more accurately describe the lands in question and, more importantly, bring into play a different set of regulatory laws designed to deal with that potential updated terminology. So just to be clear, my issue here with the DEIS in its entirety is terminology, particularly as it relates to these terms I mentioned, ceded lands, et cetera. I think once you start looking back at the events, piecing those things together and following the due process and not ignoring, you might say, very critical moments in history, you'll find that the terminology is grossly outdated. Mahalo.	Your opposition to all three alternatives is noted. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Action Alternatives
0144	Healani Sonoda-Pale		1	I'm sorry. I just wanted to point out something from the very beginning that was stated in the introduction. Kerry Ling states that in 2024, the Department of Defense Readiness and Environmental Protection Integration program, also known as REPI, awarded $4.8 million and another projected $1.5 million in 2025 to organizations. And then in 2023, REPI awarded $26.7 million. And these were all for conservation and protection of natural resources. But then -- but then later on, she says, "With the expiration of current leases and easements, this also means that the Navy and NASA programs for natural and cultural resource management would no longer continue." Which means that basically the Navy is saying, according to this DEIS, that they won't continue these programs even though they only paid $1 for 65 years of stolen Hawaiian lands and they've been poor caretakers of these lands. They have no inclination to continue these projects. And so when you talk about kuleana, this is not kuleana. This is -- this is basically a threat, saying that if you don't allow us to stay here in west -- in Mana, then we will take all this money and not -- and not fund conservation and cultural preservation efforts. And that is -- you guys have to go -- really go do some deep diving into your hearts. Saying things like that is a'ole pono. That's all. Thank you.	As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration (REPI) Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. As described in Section 3.4.2.4.5 (Biological Resources/Effect Summary) in the Final EIS, under the No Action Alternative there is a potential loss or decrease of REPI funding. In order for installations to be eligible for REPI funding, certain criteria must be met. Under the No Action Alternative, the PMRF installation would not meet criteria and therefore would not be eligible for REPI funding. Under the No Action Alternative, PMRF would continue to implement the natural resource management goals on fee simple lands, as mandated by the Sikes Act, via the PMRF Integrated Natural Resources Management Plan (INRMP). The INRMP serves as a repository for natural resource information, provides guidance on how PMRF meets compliance requirements, sets management goals, required actions, and obtain resources necessary to protect and manage the natural resources on the installation. Section 2.3.3 (Alternatives Carried Forward for Detailed Analysis/Alternative 3: No Action Alternative) of the Final EIS includes the analysis of the No Action Alternative. Under this alternative, management of the land would be transferred back to the State of Hawai'i. As the outcome of the No Action Alternative is unknown, the conclusion has been revised in the Final EIS to not include a significance determination. Information regarding the history of leases and easements can be found in Section 3.5 (Land Use and Access) of the Final EIS. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value will be determined in collaboration with relevant parties and shareholders when a final action is carried forward. Under Alternative 1,	Action Alternatives

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					lease revenue would continue to go to the Special Land and Development Fund administered by Department of Land and Natural Resources (DLNR) Land Division, with 20 percent revenue going to Office of Hawaiian Affairs lease payments. As discussed in Section 3.6.2.2.1 (Socioeconomics/Main Base, Kamokalā Ridge, Mānā Water Well, Mākaha Ridge, and Miloliʻi Ridge) in the Final EIS, payment to DLNR would be substantially higher than existing conditions. This payment would contribute to Department of Land and Natural Resources carrying out the mission statement of, "Enhance, protect, conserve and manage Hawaiʻi's unique and limited natural, cultural and historic resources held in public trust for current and future generations of the people of Hawaiʻi nei, and its visitors, in partnership with others from the public and private sectors."	
0145	Manuel Kuloloio		1	So somebody just asked me why do I feel the way that I do? So I come from a district called Honua'ula. Honua'ula starts from Pohaku Palaha in Haleakala. It goes down the southwest rift zone to Palauea, to Keoni'o'io on the left where Jeff Bezos has his private fishpond. Yeah? It goes across Alenuihaha, Alalakeiki, to Molokini and Kaho'olawe. So, Captain Prince, when I stand here, I like you know that I care. And I not just here just to talk because if I wanted to, I could have just stayed home and go on the Internet. Okay? And save my Hawaiian Airlines plane fare to come here plus my Avis rental car. Okay? So when George Helm and Kimo Mitchell disappeared or got murdered or assassinated in the waters off of Kaho'olawe, the Protect Kaho'olawe Ohana came to my father, and my dad led the legal accesses to Kaho'olawe Island under the consent decree. Okay, Captain? Ms. Mossman, share that with the captain. Okay? How are you, Ms. Mossman? Keep up the good work. And I'm sharing this, Captain -- is because at the PMRF, you got to think like, I don't need to be sued but I want to act like I have a consent decree. I want to hit all the bullets that have had lessons learned, Ms. Mossman, from the past. Captain, you need to pull out all the DLNR hearings from the Army, read all the testimony. And, Ms. Ling, as I said, every bullet needs to be hit. You know why, Captain? Because that's what the United States Navy, Army, Marine Corps, Coast Guard deserves. I never served, but even as a taxpayer I deserve one really good EIS. So to Stantec and Aecom, I'm sure you guys no like raise your hand. It's an art to do EIS. It's an art to do facilitation, Captain, in Hawaii in this time. And that's why I came, Ms. Anae, to see how shocked you guys are, because if you not shocked, Noe, they don't deserve the lease. Never even go before the DLNR board, Ms. Ling. Am I making sense? They pay people big money to capture this kind of stuff. And if you have the attitude that, "Oh, this is different, it's a real estate transaction," you going to get in trouble. Hope I'm making sense, Captain. I'm making sense, Captain? PMRF does a lot of things, big deal.	Thank you for your participation in the EIS process and for recognizing services provided by PMRF.	General Support
0145	Manuel Kuloloio		2	There was a time I was hoping, Ms. Anae, that you guys could send a hard copy, not only electronic. But, Captain, you can make this happen? Print out one, two, three, four volumes and then send it to my hometown, Kahului, Maui. Can you do that? The library, the public library.	The Navy and NASA thank you for your request. A printed copy of the PMRF KPGO Real Estate Draft EIS, Volume 1 was provided to you at the public meeting. The remaining volumes were mailed to your address on July 18, 2025, via certified mail. Additionally, a printed hard copy of the PMRF KPGO Real Estate Draft EIS, Volumes 1–6, were made available on June 20, 2025, throughout the public comment period, at	EIS Process

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				Can you make that happen, Ms. Mossman? If you cannot, I'll pay for it. But I like you send them to the Kahului Library. Okay? Because in my -- my younger days, Noe, they used to print out this kind of stuff and send them to all the libraries. You guys crazy, you reading this four documents online. I don't know how you guys do it. I always demand they give me a hard copy. Ms. Ling, am I making sense? But you opened it up for online Zoom testimony. So if they -- they here, they here or they not.	the Hawai'i State Public Library (Hawai'i Documents Center) and the Waimea Public Library.	
0145	Manuel Kuloloio		3	But, Captain, if you going be here in two years, it's the juxtaposition of what I've read in the DEIS and what your final is going to be. Okay? And for that ma'am that raised your hand, I was trained by the guy who wrote the EIS for Yucca Mountain. You ever heard of Yucca Mountain? And all those binders got sent to my grandma's house. But I say that in that spirit, Captain. This is a big deal, Ms. Ling. I hope you feel the burden. I hope you feel the burden, because you should. This is a special place. And I purposely no come make hana 'ino because my uncle don't know I'm here yet. But that's what every service member deserves, Captain. Okay? You need to hold everybody accountable. You create -- generate this FEIS. It's pa'a that you can be proud of and every Hawaiian that's proud of this thing going stand in front of the BLNR and say, yeah, I was -- I like see. Captain, hope that makes sense. I'm sorry. I'm not picking on you, Captain Prince. I'm being honest with you. And you need to be there. If get higher-ups in the Navy, you bring 'em there if it's that important. Right, Ms. Mossman? I'm serious. So that's my comment. You have my written comments. And I say this out of the spirit of harmonious relations because this -- the PMRF is a big deal. It's like when I went to (unintelligible). Okay? So thank you. That's all I have to say.	The Navy and NASA thank you for your participation in this EIS process and for recognizing services provided by PMRF.	General Support
0146	Shyanne Olores		1	Aloha. Thanks for letting me speak again. I just had one more point that I wanted to add in but I will kind of just say my whole testimony over again since we have time. It's 7:43. Aloha. My name is Shyanne Olores and I speak today as a descendant of Mānā, as a daughter of this land, and a protector of truth. My 'ohana is from here. My late grandmother and grandfather were the last of our family in Mānā town. I was raised in Nohili, fishing, gathering, and learning to live and navigate the (audio difficulty). My father and his brothers hunted in the Mānā tunnels. We have been fed by Mānā and Nohili for generations. These places are not just sacred. They are our homeland. And yet today I'm denied access to my ancestors in the sands of Mānā; denied access to my culture, to my history, to my own 'āina, all because of the U.S. military because of war and greed and because of a government that claims to stand for freedom while occupying land it stole. Let me be very clear. This is not America. PMRF is built on stolen Hawaiian land. The United States has no moral or legal right to be here. The overthrow of our kingdom was illegal. Kanaka Maoli never gave up our claim and we never will.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciate the information you provided about your family lineage. The Navy and NASA respect your concerns regarding military operations and cultural practices. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. An Access Management Plan will be prepared to streamline access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Land Use and Access

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0146	Shyanne Olores		2	The Navy wants to renew its lease it had no right to hold in the first place. (Audio difficulty) what's done to our home. There hasn't been a full EIS since 1998.	As described in Chapters 1 and 2 of the Final EIS, the scope of the EIS includes land-based leaseholds and easement lands. Separate analysis of the Navy's testing and training activities are discussed in detail in the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/OEIS and the 2025 PMRF Land-Based Training and Testing (LBTT) Final EA.	EIS Process
0146	Shyanne Olores		3	This draft ignores the true mauka-to-makai impact from toxic fuel to amphibious assaults. It leaves out the effects on endangered species, oceans and ecosystems, cultural sites, and people.	The Navy and NASA respect your concerns about addressing PMRF from mauka to makai. The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawai'i Revised Statutes Chapter 343) and National Environmental Policy Act (NEPA). Potential effects to the environment and cultural practices from the Proposed Action are analyzed and addressed in the Final EIS. The scope of the Project as defined by the applicants is defined by the area for which the applicants seek real estate agreements with the State of Hawai'i Board of Land and Natural Resources, which is described in Section 1.2 (Project Area) of the Final EIS. As stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, "Navy training and testing operations do not occur on these State lands. The environmental effects of these training and testing operations are fully analyzed in previous, focused environmental documents referenced in Section 1.5 (Scope of Environmental Analysis) of the Final EIS.". As stated in Section 1.1, the EIS has been prepared consistent with Hawai'i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai'i Revised Statutes (HRS) Chapter 343. "The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application." The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: NEPA (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. Potential effects to the environment from the Proposed Action are analyzed and addressed in the Final EIS.	Ongoing Activities
0146	Shyanne Olores		4	Over the last seven years, seven of my 'ohana have died from cancer, all of them working. All of them spent their lives in the fields, in the waters, on the land. And what -- where they chose to, PFAS, fuel tanks, toxic soil, contaminated groundwater, poisoned land, poisoned water. This is a result of American values -- expansion, extraction, and militarism -- and they are not welcome here. The Navy admits PFAS were found in numerous soil and underground water back -- groundwater back in the 1960s. It's still there. No clean up, no time line, just the same tired promise, remediation is forthcoming. This environmental violence is generational harm and it must stop.	The Navy and NASA respect your concern regarding cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. All fuel stored on leasehold and easement lands is presented in tabular format in Section 3.12.1 (Hazardous Materials and Waste/Affected Environment) of the Final	Hazardous Materials and Waste

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					EIS. The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized.	
0146	Shyanne Olores		5	The DEIS doesn't even mention RIMPAC, the world's largest military exercise. Battlefield, live-fire drills, missile tests, war games, weapons tested here are sold to foreign governments, and using global conflicts and genocides. Hawai'i is being used to train the world in how to wage war on land that was never America's to begin with.	The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Ongoing Activities
0146	Shyanne Olores		6	I'm here to say this: Clean up your toxic mess, restore our sacred places, and return to the -- return the land to its rightful stewards (audio difficulty). My ancestors did not die for this. My family should not be dying from this. This is not America. This is Hawaii, and we are not for sale. Return Mana, return Nohili, return our future. Mahalo.	The Navy and NASA thank you for your comments and appreciate your participation. Your concerns have been heard.	Land Use and Access
0147	Tara Rojas		1	Aloha. And after hearing the previous testifier, what he said is on point that none of the alternatives are correct until you change the wording from "ceded" to "seized" and/or "occupied" lands. And, again, that changes the whole purpose, effect, and the goal of this. So you have to change it from ceded because it's not ceded; it's seized and occupied lands.	At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. Your preference for the No-Action Alternative is noted.	Land Use and Access
0147	Tara Rojas		2	With that being said, the land does need to be cleaned up. You all need to clean and the land does need to be returned back, not to the fake, unlawful state because, again, it's seized and occupied lands, not ceded land.	At this time, the land is under State jurisdiction by the DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. Your preference for the No-Action Alternative is noted.	Land Use and Access
0147	Tara Rojas		3	So which (audio difficulty) this whole state is a fake state. It's unlawful and illegal. So the land needs to go back to -- and it's still for and of Kanaka Maoli, Kanaka ʻŌiwi. So the land needs to go back to the lineal descendants. Again, why?· Because anything (audio difficulty) whether you agree with or communicate or, you know, that is enhanced mitigation management efforts, clean up, communicate, or (audio difficulty) environmental actions, stop. Just stop and leave. They most definitely will have (audio difficulty) because all the military does is train people to desecrate (audio difficulty) in order to what? To kill. And you're doing this on the most isolated land mass in the world in which, again, there are communities.	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. Your preference for the No Action Alternative is noted.	Land Use and Access
0147	Tara Rojas		4	So, again, change it to "seized and occupied lands" and the alternative is once the lease is up, you leave, you go home -- clean it up before you go home (audio difficulty) she can go back to visit her ancestors to visit the iwi of her ancestors buried on her ancestral homeland because this is her homeland, not your land. Mahalo.	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. Your preference for the No-Action Alternative is noted.	Land Use and Access

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0148	Chris Ka'iakapu		1	Okay. Aloha mai kākou. O Chris Lono Ka'iakapu koʻu inoa. No Hanapēpē ahupuaʻa mai au. Moʻokūʻauhau ma Hanapēpē, ma Waimea, ma Niʻihau, ma Nā Pali. I represent myself. I have to spell my name? Is that counting my time? You said to spell my name. Do I have to spell my name? C-h-r-i-s-t-o-p-h-e-r, Ka'iakapu, K-a-i-a-k-a-p-u. Good? Yeah. I represent myself. I represent my kupuna. I represent West Kaua'i. I represent the sands of Nohili, of Polihale, the waterbirds of Kawai'ele, of Mānā, the now long-gone agricultural systems, and coconut groves of our kupuna, the waters of Waiapua'a Bay. Yeah. I will just address the elephant in the room first. The Hawaiian nation never signed a treaty of annexation and PMRF operates illegally on occupied land that is leased out by the illegitimate state of Hawaii. Complicit -- complicity with their operations is to be complicit in colonization and the war machine. Let's just get that one out of the way.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Land Use and Access
0148	Chris Ka'iakapu		2	This EIS does not address the marine ecosystem impacts of PMRF operations. PMRF operates the Kawai'ele pump station and Mānā water well which enable the artificial environment that we now have in Mānā that allows PMRF to exist instead of the thriving abundant wetlands that supported some of the largest-known native waterbird populations in Hawaii.	The Navy values the water resources found in the Mānā Plain and within the greater Region of Influence (ROI). As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all NEPA/HEPA (Hawaiʻi Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. However, in an effort to support native ecosystem restoration and mitigate for flooding events, PMRF and Kekaha Agricultural Association are partnering in an initiative supported by the Department of Defense's Readiness and Environmental Program to create an open floodable space on easement parcels in the Mānā Plain, which will reduce the amount and improve the quality of stormwater runoff discharged from agricultural drainage ditches into the nearshore environment at PMRF. This open floodable space will also reduce the threat of erosion to PMRF infrastructure and will promote the regeneration of historic wetland habitat for endemic and endangered Hawaiian waterbirds. This area is shown in Figure 3.7-6 in the Final EIS. As discussed in Biological Resources (Section 3.4.1, Affected Environment), several species of Hawaiian waterbirds regularly utilize wetland areas adjacent to the ROI including Kawaiʻele Waterbird Sanctuary and Mānā Plains Forest Reserve. Under the No Action Alternative, the Navy could no longer pay operation and maintenance costs for the Kawaiʻele Pump Station (KPS). If the State chooses not to operate KPS, there could be increased surface water levels and flooding of low-lying areas of the Mānā Plain (including flooding of the Kawaiʻele Bird Sanctuary) due to the unique hydrology	Water Resources

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					of the area. Flooding of this area could submerge vegetation and decrease nesting and foraging habitat for some wetland-dependent wildlife. This is addressed in Water Resources (Section 3.7.2.4.1, Main Base). Finally, the Navy and NASA are developing Enhanced Engagements that will add to the existing protections at PMRF and KPGO. Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-5 includes the establishment of a Navy-Department of Land and Natural Resources-Department of Hawaiian Home Lands-Kekaha Agricultural Association-ADC-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i. The Navy also plans to continue to work with PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. The PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	
0148	Chris Ka'iakapu		3	So what baseline are we actually measuring from? Are we measuring from an already damaged one that we currently know and have seen for the past few decades at least? Or are we measuring from the historical prior to PMRF ever existing? Are we really supposed to believe that decades of water diversion, rocket launching, war games, access restriction, development expansion has no cumulative, adverse impacts?	The Navy and NASA respect your concerns regarding historic use of these lands. The approach to analysis in this EIS, as with all NEPA/HEPA documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the associated management activities for the action alternatives. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. Additionally, Chapter 4 of the Final EIS describes past, present, and reasonably foreseeable actions relevant to cumulative effects and analyzes the cumulative effects potentially resulting from the interaction of the Proposed Action with other actions.	Cumulative Effects
0148	Chris Ka'iakapu		4	Learning from Red Hill, the EIS provides no comprehensive list of tanks that store hundreds of thousands of gallons of fuel right near the coastland and wetlands on PMRF nor does it provide for soil groundwater or leak testing. What about the firefighting PFAS that have been waiting over 60 years for remediation? How about we clean up that mess first before statements like "committing to a continued stewardship of ʻāina?" In fact, no time line of promise -- or promise to clean up this mess is ever even provided.	The Final EIS has been updated to include more information on the per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site, and also provides more details regarding safe storage of fuels at PMRF (see Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS for both. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. All aboveground storage tanks are equipped with a secondary containment device (i.e., steel basin, double-walled steel tank) and all underground storage tanks are equipped with advanced leak detection systems. Risk assessments are conducted for all storage tanks at PMRF by a third-party environmental engineering firm every 2 years. Per State of Hawai'i Department of Health (DOH) regulations, PMRF conducts comprehensive soil testing during the decommissioning phase of all underground storage tanks. Please see Section 3.12.1.4.1 (Hazardous Materials and Waste/Main Base) of the Final EIS for more information. Fuel storage tanks located on fee simple land are not analyzed in this EIS; however, aboveground storage tanks and underground storage tanks on fee simple land are disclosed in the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1.1.1.6 of that document, which is publicly available, and can be found on the EIS website (www.pmrf-kpgo-eis.com).	Hazardous Materials and Waste

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					Section 3.12 (Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on PFAS identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the DOH and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	
0148	Chris Ka'iakapu		5	No mention of RIMPAC and the impacts of live-fire drills, et cetera.	The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Cumulative Effects
0148	Chris Ka'iakapu		6	A quick read into the accounts of Captain Cook's observations when he happened upon Kaua'i in 1778 will reveal that Mānā and West Kaua'i were a much more vibrant and abundant place when the lands were managed by Kanaka Maoli. I challenge you to envision a radically different future for Mānā, Nohili, Kawai'ele, Waiapua'a Bay, and Koke'e, one devoted to peace, agricultural abundance, thriving wetlands and coconut groves, not one invested in the war machine, global militarization, not the demise of flora and fauna found nowhere else on earth. I support the no-lease alternative and the return of these lands by the state of Hawai‘i -- to the state of Hawai‘i until they can transfer them back to the rightful Hawaiian nation. If that seems too hard to grasp, I support extra lease rates for being a tenant in bad standing. Mahalo.	The Navy and NASA thank you for your comment, and your opposition to military activities and the project is noted.	Action Alternatives
0149	Roslyn Cummings		1	Aloha. My name is Roslyn Cummings. I'm born Roslyn Nicole Manawaiakea Malama Noho Ao Kalaheo Ahupua'a, Kona Moku. My ‘ohana is the Naumu Malama Makanui ‘ohana. We've been in this Kona Moku Na Pali for generations. I want to go based off of what I'm here for. So I'm going to address the legal representative because he's supposed to know law. Fraud vitiates everything. Everything that is fraudulent vitiates everything. So I know because my tutu kane, Benjamin Naumu Kapuaaiki, who was the son of Kapuaaiki and Kaapumohu Kaapuwai -- they're both -- Kapuaaiki was the chief of Koolau and Kaapumohu Kaapuwai was a chiefess and they come from the long of lines of Kaumuali'i. So I'm only here to represent my kupuna and the next generations as a trustee and a trust beneficiary from the Hawaiian Kingdom. And the reason why I say that is because that's not the hierarchy of law. Hierarchy of law is God's law.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process.	Cultural Practices

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0149	Roslyn Cummings		2	And if you guys all come from church and you guys know it, understand that everybody get free will. But for those of you who consent to this desecration and the deprivation and the depletion of our wai and -- and the desecration of our iwi kupuna, just remember that's not your free will. I never give you guys my consent. And my children, my kupuna never give you guys that consent either. That's not even a cultural practice. I don't remember any time in our cultural history where we remove iwi. Mānā, through my family's mo'olelo, is the oldest Tahitian village. It's kind of shameful that we became the cultural practice of the po'e haole at heart. Because I talk about culture, I going go beyond the plantation. My tutu man, Edmund Malama, who passed away in April of last year, he remembered every single valley of water and everything throughout this way and that's because that was part of our culture. So removing iwi, depleting water is not our culture.	The Navy and NASA follow applicable federal law (National Historic Preservation Act and Native American Graves Protection and Repatriation Act) and State law (Hawai'i Revised Statutes Chapter 6E-8) for all projects located in the project area. The Navy's Integrated Cultural Resource Management Plan includes best management practices and standard operating procedures (SOPs) to protect cultural sites, including those with iwi kūpuna. SOP #7 that requires the Navy to identify impacts to iwi and historic properties and to resolve those impacts by avoiding, minimizing, or mitigating them before an action can proceed. SOP #10 is the Navy's plan regarding iwi if they are inadvertently discovered during any activity at PMRF, military or civilian. When iwi are found, the Navy and NASA consult with appropriate native Hawaiian descendants under Native American Graves Protection and Repatriation Act to determine if iwi are to be reinterred or relocated.	Cultural Practices
0149	Roslyn Cummings		3	How can we trust the Navy when in the past hundred-plus years they been here -- so, like, I brought up Benjamin Naumu; 5362, that's the deed. Okay? There's an (unintelligible). But every time they do an EIS, they use his -- his land patent. Why? Because that is one of the strongest holds that can fight against this. So what I going bring up is this: 1920, Anne K. Knudsen, Kekaha plantation. Please, inside your EIS, provide us with your chain of title. I like your guys' boundaries as well. Not only land boundaries, I like your guys' nautical boundaries. Bring that in as well, your nautical maps. I want all of your guys' mappings. All got to be provided in the EIS. Not just because I state it, but this is one public -- I'm commanding and demanding you guys to provide that. So chain of title -- again, you guys have a title that comes from the 1920 Anne K. Knudsen grant. That's illegal already; that's fraud.	The Navy and NASA comply with all applicable federal, State, and local regulations at PMRF as discussed in Section 1.3 (Background), Section 1.6 (Relevant Laws and Regulations), Section 6.1 (Consistency with Government Plans and Policies), and Appendix E of the Final EIS. Current real estate agreements are included in the Final EIS in Appendix C. Please find figures depicting details of the leaseholds and easement lands in Appendix D of the Final EIS.	Land Use and Access
0149	Roslyn Cummings		4	And so I will be here with everyone else who no support this because -- I'm sorry, but you guys not leaving very much for our future generations. Because from what I grew up till now, I no even let my kids sit in this water because my kupuna told me not to. Because guess what? We going have an increase in cancer the next 20 years. 70 percent, that's what my kupuna said. And my tutu lady -- she protected this. So I just letting you guys know, when you guys come from outer islands, remember kuleana means to respect and be responsible. Remember that.	The Navy and NASA respect your concern regarding increase in cancer rates. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner.	Public Health and Safety
0150	Kaimana Castaneda		1	Before I share my mana'o in today's meeting, I like to give my aloha to the illustrious panel here and everybody gathered. Aloha kākou. My name is Keith Kaimana Castaneda. I live in Kekaha and I'm also a military veteran. But I got about five things that I just want to bring up and share. So, first, whatever alternative you guys use, please consider some rule in residential uses of the parcels. A couple considerations, keep it down to 15 acres and less so that we can manage it locally instead of BLM. Maybe incorporate five years people stay here. And, you know, median income anybody make 2,000 -- 200,000 or less instead of just kids that no can and everybody that get fortunate enough because a lot of our kids -- my kids and grandkids live in the mainland because they cannot afford it. So if you going use the land, maybe we can use that for some residential stuff to get our kids back here instead of living in the mainland.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Thank you for your suggestion. As the largest high-tech and third largest overall employer on Kaua'i, PMRF employs about 900 people, including defense personnel and civilian contractors. PMRF contributes approximately $150 million annually in salaries, contract goods, and services to the local economy. Further details regarding demographics and economics in the Project Area are discussed in Section 3.6 (Socioeconomics). The EIS also discusses the Waimea 400 Master Plan in Section 4.1.5 (Introduction to Analysis/Past, Present, and Reasonably Foreseeable Future Actions).	Land Use and Access
0150	Kaimana Castaneda		2	Two, please consider historical sites. Like in Mānā, we talk about cultural which is important. We talk about some other national requirements, but consider some of the stuff like the Mānā internment camps that many people don't know about. There was a camp there during the war that lot of Japanese-American families know	Thank you for providing information on the Mānā internment camps. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. An archaeological inventory survey was conducted and the report with the results are included in Appendix F of the Final EIS. The survey was	Archaeological and Architectural Resources

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				about, but because it's a dark part of our history, they no say nothing. Find that place and maybe incorporate that when you bring this up. All historical stuff is important so we don't make the same mistake twice.	conducted in areas where Navy and NASA utilize the leasehold lands and roadways and utility lines. Throughout the development of this EIS, the Navy and NASA have coordinated and met with the Aha Moku Council to continue PMRF's commitment to cultural resources.	
0150	Kaimana Castaneda		3	Reactivate -- research reactivating the several freshwater springs in the Mānā marshland that was kept pre-plantation days that only some Hawaiians know about. My father-in-law was one of them because he was the hanawai man many years for plantation. There's, like, seven freshwater wells that were kept and that's why you're have problems mitigating the overflow from the rain from mauka and underneath because it's coming up. So that's probably one of the reasons why you run into some problems.	The Navy and NASA thank you for the information regarding the freshwater springs. However, other wells located within the Mānā Plain are not analyzed in this EIS as they are managed by Department of Land and Natural Resources and Agribusiness Development Corporation. The Navy and NASA are developing Enhanced Engagements that will add to the existing protections at PMRF and KPGO. Proposed Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-5 includes the establishment of a Navy-Department of Land and Natural Resources-Department of Hawaiian Home Lands-Kekaha Agricultural Association-Agribusiness Development Corporation-Kaua'i County Working Group to collaboratively manage water resources in West Kaua'i. The Navy also plans to continue to work with PMRF Kaua'i to establish regular communication channels to strengthen relationships with the community, and other interested stakeholders. PMRF Kaua'i will provide a means of providing a proactive method for two-way communication, promote greater dialogue to working collaboratively toward common goals, and develop solutions. If you would like to get involved, the PMRF Kaua'i website can be found here, https://pmrfkauai.com/.	Water Resources
0150	Kaimana Castaneda		4	Please research accommodating some of the native flora, fauna, fish, and wildlife -- not tilapia because that's not natural. Example, the -- you know, the sanctuary that is used to -- to accommodate the overflow for all the birds and stuff, before that, never have birds. The only thing living in there is tilapia; that's not natural. So please consider that.	PMRF has been involved with several native restoration efforts in and outside of the Project Area and recognizes the importance of native ecosystems. Several waterbirds have been observed foraging on the easements of the Mānā Plain, as discussed in the 2024 PMRF Fauna Survey Report, which indicate the presence of aquatic arthropods (Appendix K of the Final EIS). Although tilapia are present in canals in and outside of the Project Area, the Navy did not introduce them nor does the Navy manage them.	Biological Resources
0150	Kaimana Castaneda		5	Lastly for NASA, have you ever been to the Imiloa Center UH Hilo? I recommend you guys go, that you can connect the cultural and the scientific that Hawaiians knew way before anybody else got here. That might help with your connection with the culture. Mahalo.	Thank you for the recommendation. The NASA team appreciates the suggestion to visit the Imiloa Astronomy Center at University of Hawai'i Hilo as a way to further understand and connect cultural and scientific perspectives. The Navy and NASA recognize the importance of incorporating cultural context into our work and will take this recommendation under consideration.	Archaeological and Architectural Resources
0151	Sarah Braunsdorf		1	Yeah. This is Bertram. Hi. I'm Sarah Braunsdorf representing the Keala Foundation. And this is Bertram Almeida, cofounder of the Ultimate Hawaiian Trail Run and Keala Foundation. We just -- for those of you that don't know -- I know I've talked to some of you in the room already -- the Keala Foundation is a nonprofit on island that serves the youth community in Kekaha, Lāwa'i, Lihue, Anahola. And we aim to give kids an environment that is safe, healthy, free of drugs and alcohol. Right? And we just to want you to consider -- thank you for opening this up for us and all of us to share. I just think that as you move forward with anything, please consider how you can support the local community and local organizations like the Keala Foundation and like many others on this island that are doing great work for the youth, for adults, for -- for every -- everything; right? We specialize in what we do but there's so much good work to go around and so we just -- I just can't encourage you enough to see how you can partner beyond just visits to PMRF, but, like, how can you direct some funds to communities that need it; right? And really dive in and open that up for organizations to apply or however you might need to do that.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Thank you for the work you do. Your suggestions regarding community engagement have been heard. The Navy and NASA recommend contacting the PMRF Public Affairs Officer (808) 335-4740 or PMRFPublicAffairs@us.navy.mil and submitting this suggestion to the PMRF Kaua'i website (https://pmrfkauai.com/).	Mitigation and EMMs

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0152	Steven Sullivan		1	Aloha no kākou. Steven Sullivan. Do I have to spell my name or not? Okay. I don't have much to say. I'm currently the principal at Kula Aupuni Ni'ihau A Kahelelani Aloha A New Century Public Charter School, KANAKA PCS. I'm also the treasurer on Kanaka Aupuni A Ni'ihau Aloha which is KAANA, Inc. And I'm also on the board for Kekaha Ranchers and Farmers Association. I just want us to remember a few things. I used work out at the base, and then it's not about me. But this is "the place," Kekaha. And it also means "the line." And the line is connected all the way back to the Big Island. Kekaha Beach Park and Kekaha here on Kaua'i form the line of the archipelago all the way up. So this is the place you need to respect the people that came before, the Ni'ihau people, the Kekaha people, the people on Kaua'i that all live on the Na Pali Coast and travel back and forth between Ni'ihau and Kekaha and all the way. And the most important thing you need to remember is an English word called "mana." It also means the same thing in Hawaiian, "mana." Mana is out there. So this place is the source of mana for the Hawaiian kanaka and you need to respect that. Thank you.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Thank you for letting us know the important roles you hold in the community. Thank you also for the history and reiterating the importance of mana.	Cultural Practices
0153	Jose Felix		1	Hi. Good afternoon, everyone. My name is José Felix. I am a worker at one of the biggest contractors at PMRF. I'm not here representing the contractor. The reason why I have this shirt is because I'm also involved in the community. I'm the president of the association for community sports and right after work I go do my thing over there. As a worker at PMRF for over 15 years, I manage a safety and health and environmental department for Koa Lani under the guides of the PMRF environmental department. And I could tell you one thing is my profession that everything that we do, everything that we are doing is in order to maintain regulations, regulations abiding by either, OSHA, EPA, the DOD, state and federal. So all these regulations and obligations that we have, I can testify that we are doing that. We are being compliant. We are taking care of the environment, of the wildlife. All the work effort that has been there is -- in my opinion, has been taken for granted.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Thank you for recognizing services provided by PMRF and NASA, and for recognizing the natural resources programs at PMRF. Thank you for your involvement in the community. Additional information about Navy and NASA's mission and use of these lands is included in Section 1.3 (Background) of the Final EIS. Public and agency engagement for the EIS and other community engagement is included in Section 1.7 (Public and Agency Participation and Intergovernmental Coordination) of the Final EIS.	General Support
0153	Jose Felix		2	So I would suggest to find a middle ground in where the community can absorb the information better, suggest to have some type of alert system or -- an example that I can use is the Kaua'i Emergency Management Agency. They have alert systems -- they can alert you about the weather, they can alert you about traffic, they can alert you about a lot of different things. So all the good stuff that is being done I think is not being sent -- pushed out to the community. So that alert system, similar to what KEMA has, you can probably partner with KEMA and they're already sending out the alerts. Provide either to your PAO, your public officer -- affairs officer to feed him information and let people know what are you doing with the iwi, what are you doing with the wildlife, what are you doing with the turtles, with the eggs and the nestings and all that, which I believe is all good. But the community doesn't see that. The community has a mind perception, whether it's good or bad. And I can testify that it is being steward in the right way because if you allow either the state or the county, I believe it's going to get worse. We already know what stewardship of Polihale is with the bathrooms and the roads and so on. And not to mention, you know, just our public roads and period; right? But, again, suggestion would be to have some kind of alert system. I'm not talking about social media. I'm not talking about a newsletter. But people can subscribe to it and basically get the information that I know is happening over there. And I'm sure if they have information that they want to pass back, maybe they can	Your suggestion regarding an alert system has been heard, also please see Enhanced Engagement-4 in Section 5.2 (Proposed Enhanced Engagements) of the Final EIS which includes regular public and community engagement. As part of this EIS process, PMRF developed a new public outreach website at https://pmrfkauai.com/ (EE-4, Table 5.2-1). The website is intended to provide Kaua'i communities with information about PMRF, the Navy's long-term resource protection efforts to protect natural and cultural resources within its care, and its role in the community. The Navy strives to balance its mission for national defense with the long-term protection of the Kaua'i landscape and heritage. A quarterly newsletter also aims to keep the public more informed, and the public may sign up for the newsletter by visiting https://pmrfkauai.com/. Thank you.	Mitigation and EMMs

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				have a liaison or somebody that they can communicate with to request for information. That way, their community is more aware, more knowledgeable. And you might be dispelling all these questions and concerns that people have with -- with PMRF. Thank you.		
0154	Mahealani Chandler		1	Aloha mai kākou. My name is Mahealani. I'm a new mom and I carry the kuleana of an iwi kupuna protector. I come forward today with deep concern for community military presence and expansion of the Pacific Missile Range Facility on Kaua'i. My connection to this ʻāina runs deep. My grandfather told us stories of watching bombs being dropped while trying to provide for our family. This violence to the ocean, to the species, to our memories, it's not normal. It's not pono.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process.	General Opposition
0154	Mahealani Chandler		2	One, destruction from mauka to makai, the military continues to ignore the real harm being done to our lands and waters. From the mountains to the sea, the Draft Environmental Impact Statement fails to give a full and honest picture of how these ongoing activities impact our environment, our people, and our sacred places. That hasn't been full -- environmental impact statement since 1998. Yet the Navy now wants to triple its activities and still claim no significant harm. That is both misleading and disrespectful. Stolen land, ignored truth, PMRF sits on land that was never lawfully ceded.	The Navy and NASA respect your concerns related to the environment, people and sacred sites. All National Environmental Policy Act (NEPA) documents require thorough analysis of environmental resources resulting from Proposed Actions. Chapter 3 of the Final EIS analyzes all environmental resources and affiliated consequences. Effects to terrestrial biological resources from the Proposed Action are described in detail by location in Biological Resources (Section 3.4.2, Environmental Consequences) in the Final EIS. Please see Section 3.3 (Cultural Practices) of the Final EIS for an analysis on Cultural Practices. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Ongoing Activities
0154	Mahealani Chandler		3	As a mother raising the next generation, I cannot allow this truth to be erased. The DEIS fails to acknowledge that the Hawaiian Kingdom was overthrown illegally and these lands remain in dispute. The erasure fuels ongoing harm, not just to the land but to our history, our dignity, and our future.	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS.	Land Use and Access
0154	Mahealani Chandler		4	RMIPAC [sic], a militarization hidden and dangerous. These DEIS leaves out RIMPAC, one of the largest and most destructive military exercises in the world. These include live-fire drills, missile launches, sinking of ships, swarms of warships throughout our ocean. These actions cause major environmental damage and spiritual desecration especially in sacred and sensitive areas like near Ka'ula and within Papahānaumokuākea --harm	The Rim of the Pacific (RIMPAC) exercise is outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine	Cumulative Effects

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				to life, seen and unseen, these species and ecosystems including sea turtles, monk seals, native birds and plants. Impacts include beach destruction, marine life destruction, and wildlife from rocket launches -- wildfires from rocket launches. These are not isolated incidents. There are cumulative harm that builds up over generations.	resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 HCTT Final EIS/OEIS analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. Effects to terrestrial species from the Proposed Action are described in detail by location in Section 3.4.2 (Biological Resources/Environmental Consequences) in the Final EIS.	
0154	Mahealani Chandler		5	Where are the institutions that should protect us? Many in our community are asking, "Where is OHA in all of this?" We are -- we are the agencies and leaders -- where are the agency and leaders who are supposed stand with us? Tonight, the military meetings and OHA -- sorry, guys -- happening at the same time. This forces us between standing for land and trying to hold our institutions accountable. We should not have to choose; so this is my request. To the military, stop expansion and desecration. No amount of donating nonprofits or employment or research justifies your desecration. To our institutions, stand with people, acknowledge the occupation, protect our ʻāina. As a new mom, I'm here to show my daughter what it means to stand up for what is right, to protect our kupuna, our ʻāina, and our future. Mahalo.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA are consulting with Office of Hawaiian Affairs throughout this process. The Navy and NASA held three public meetings with virtual components to reduce barriers to meeting access for the public. Thank you for participating in the meeting.	EIS Process
0155	Sherri Cummings		1	Aloha mai kākou. My name is Sherri Cummings and I will use the word lineal descendant of this wahi pana of the island of Ni'ihau. And I'm glad that there's a court reporter because I don't know who I'm going to give it to, whether it's them or you, but I tell our kanaka people to be diligent regarding mo'okuauhau because my name is Sherri Cummings. I'm the daughter of Ruby Kawaiulailiahi. She was a Pia whose mother is Elizabeth Kapeka Charman whose mother was Sarah Sinclair whose father was James McHutcheson Sinclair, Royal Patent 2944. I want to put it on record that this came from the state and I was blessed because my tutu lady Sarah was born 1863 October 31. She died June 30th, a little while ago, 1932. I thought I lost this. I moved back from Oʻahu almost three years ago for a spiritual and for a calling from kupuna. As the woman so eloquently stated, why we -- I have no choice. My mom just died. I'm only 56 and I wear these shoes of my kupuna. So I'm going to say I am challenging the ownership of that island of Ni'ihau because James McHutcheson Sinclair was born truly in Scotland, Ireland with his sisters Jane Gay, Anne Knudsen, and Helen Robinson. And my tutu man came here before that ship that they said came in 1864. I have documents that shows he was married in 1848. And no one talks about his wife that the family said he didn't marry and he didn't have children. His wife's name is Nako'oko'okukalani who is the daughter of Kalehuna Aukai who is the daughter of Kalehua Wehewehe. And you folks need to understand when we talk about kupuna, it's hard to speak especially when that line is a kahuna line when we had to find our kupuna in this manner. On my kanaka -- on my tutu man's side, I'm very much related to that island because his mother is (Kahinalukeʻō) whose mother is (Hōʻaʻa) whose father is Nawaiki whose father is Keahinui.	The Navy and NASA thank you for your comments and appreciates your participation in the EIS process and sharing of your moʻokūʻauhau. The proposed leaseholds and easement lands analyzed by this EIS are located entirely on Kauaʻi in the locations described in Section 1.2 (Project Area) of the Final EIS. Niʻihau is outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government or State officials to voice concerns regarding jurisdiction of Niʻihau. The Navy and NASA are presenting Enhanced Engagements in the Final EIS under the action alternatives to promote protections for the land. These measures were developed based on feedback received from the public during the scoping and public comment periods. These measures were referred to as Enhanced Management Measures (EMMs) in the Draft EIS and in the Final EIS they have been renamed and further developed based on public comments. The Proposed Enhanced Engagements are discussed in Section 5.2 (Proposed Enhanced Engagements) and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-4 discusses the development and continuation of PMRF Kauaʻi which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders	Land Use and Access

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				And if you folks talking about protecting everything culture and I've heard 6E mentioned -- we fighting to get into the space of our kupuna.		
0156	Kaneali‘i Williams		1	Mahalo. Aloha kākou. My name is Kaneali'i Williams. I am a lineal descent of the Kapalehua ‘ohana of Ni'ihau. And through that ‘ohana, we are ‘ohana to Papapa of Ni'ihau. I heard earlier from one of the uncles the message of needing to respect the ‘ohanas of Ni'ihau and then I also heard earlier about the request for this EIS, that the PMRF provide its nautical boundaries. And I also want to support those -- those statements. And the reason being is because the current area that PMRF is located -- we cannot just look at the ‘āina -- at just the ‘āina on land. It is bordering Kaulakahi, the channel between Kaua'i and Ni'ihau. And, therefore, the EIS needs to have information about Kaulakahi and its impacts that it will have there and, also, the surrounding waters of Ni'ihau.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to other military operations. However, impacts at Ni‘ihau Kaulakahi are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Biological Resources
0156	Kaneali‘i Williams		2	I heard earlier from the presentation that you folks contacted or had some representation from Aha Moku, from the Hawai‘i State Aha Moku. I highly doubt that because I was not contacted. PMRF already knows that I'm a lineal descendant of Ni'ihau and through the papa -- ‘ohana Papapa because I participated in the consultation process for Ka'ula. And through your folks' documentation, you acknowledged my lineal descendancy to Papapa ‘ohana. And I provided you folks with my genealogy affidavit, our land title information to Ni'ihau. And your documents show that I'm ‘ohana to Papapa. So I'm wondering why I was not directly contacted by PMRF through this process. The Ka Pa'akai analysis is not complete. Hawai‘i State Aha Moku has not contacted me yet. I don't know who you folks got in contact from Ni'ihau to represent us, but whoever it is does not represent us. And I'm saying this also because, as was stated previously by Sherri just now challenging the ownership of Ni'ihau, the Robinson ‘ohana is not the only owners of Ni'ihau. And you folks have my documents already. So as far as this EIS moving forward, I do need to be involved in every process of this. I am -- my kupuna -- from the time Papa and Wakea traversed Kaulakahi from Kaua'i to Ni'ihau, from Ni'ihau to Kaua'i, back-and-forth, back-and-forth all the way up until our ‘ohana migrated from Ni'ihau to Kaua'i again to Wailua, Kaua'i in the 1850s.	Thank you for your comment and sharing of your mo‘okū‘auhau. The Navy consulted with State Aha Moku through its Luna Alaka‘i (Executive Director) Leimana Damate. The Navy also consulted with Mano O Kalanipo (Kaua‘i Island) representatives Billy Kahohelauii, Kane Turalde, and Presley Wann. Ni‘ihau is not included in the Proposed Action and outside the scope and jurisdiction of this EIS; therefore, no Ni‘ihau representatives were consulted for this EIS.	Cultural Practices
0156	Kaneali‘i Williams		3	So there's a lot of things that are missing from this EIS and needs to be addressed. And you folks need to get your stuff together because, again, you guys are already aware of this through the Ka'ula consultation process. So that's all I have to share for today. And I will be looking forward to the contact from you folks in the future. Mahalo.	The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawai‘i Revised Statutes Chapter 343) and NEPA. The Navy and NASA understand your concern about impacts outside of the Proposed Action, which includes impacts to Ka‘ula island.	EIS Process
0157	Mervin Chun		1	I'm just speaking in opposition of the EIS. I am a Kanaka Maoli or a Kanaka ‘Ōiwi. The United States military is very bad steward of the land, just going on past things that have happened. The Red Hill. They're not going to clean up at Pōhakuloa. They say it's -- very straight to it -- everyone's face, they're not cleaning up after their messes which is -- I don't know. To me, it's -- that should be the main thing of an EIS is that they cleaning up after their mess. I mean, to me, it's just like a -- to me, it's just like a squatter in your house. He came uninvited, he desecrated everything, and then we're still trying to have you here in my house? There's no way anybody would let anyone come in and desecrate their house and ask them to come back again.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA’s ongoing commitment to	General Opposition

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				So that's pretty much what the United States military is doing is they're asking us to come -- come back, retain their leases when they don't even -- I mean, they're not even taking care of anything. So to me, that's -- and another thing is this is the Hawaiian Kingdom. This is not America. Permanent Court of Arbitration stated clearly that this is the Hawaiian Kingdom and it still exists. There is no treaty of annexation, there is no treaty of peace. So that's a big "no" on these three tensions and -- and a no to the EIS. Mahalo.	meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation. The Navy strives to provide long-term resource protection, and works with neighboring communities to respond to requests for cleanup. For example, in late 2022, the Department of Hawaiian Home Lands (DHHL) identified debris from an almost 60-year old missile on DHHL lands in Niu Valley, Kaua'i. After discovery, PMRF organized an immediate Explosive Ordnance Disposal response, and determined that there was no immediate threat to the public or the environment, and began removal planning. In 2024, the PMRF Public Works and Stewardship office partnered with a local business and volunteers to clear approximately 2,300 pounds of debris from the site, and all recyclable debris was disposed of properly at a recycling center in Līhu'e. This removal effort will allow for more effective land use for DHHL, and demonstrates the Navy's commitment to response and recovery of military debris. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. Finally, The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill and Pōhakuloa are outside the jurisdiction and scope of this EIS.	
0158	Healani Sonoda-Pale		1	My name is Healani Sonoda-Pale. I am actually from O'ahu. My great-great-grandmother, Hanapalo, was -- was born in Mānā. So was her father and mother. I can trace my genealogy back so I am a lineal descendant of Mānā. I am a Kanaka Maoli, Kanaka 'Ōiwi. I am also an O'ahu water protector. And I have about -- over three years of experience working with the Navy and -- and listening to their lies. And I'm here -- I flew here because I'm really concerned about this because this doesn't just affect Kekaha or Kaua'i or even Hawai'i. This is -- this has global implications, the fact that PMRF continues to practice their war games here. These war games that they're practicing here is used to oppress and commit genocide against other peoples, other indigenous peoples around the world.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Thank you for sharing information regarding your familial connection to the land.	General Opposition
0158	Healani Sonoda-Pale		2	And as an O'ahu water protector, I can tell you, mai hilina'i, do not trust -- do not trust the Navy and what they're telling you. When they tell you the water is safe to drink, mai hilina'i, do not trust them. Do not listen to their lies because we need to start fighting and standing up for a future that's sustainable, not for just today but for generations to come.	The Navy is committed to providing PMRF and the surrounding community with safe and dependable drinking water. Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) of the Final EIS describes the multiple water quality monitoring programs that are in place at the Mānā Well, which is the main source of potable drinking water for PMRF. In addition, Table 3.7-2 provides a comprehensive list of best management practices and standard operating procedures that are used at PMRF for the protection of water resources.	General Opposition
0158	Healani Sonoda-Pale		3	The girl that was standing here before begging for money for her foundation, that's not what this is about. This is about protecting our 'āina and our wai, and not for us but for our children and our grandchildren.	Comment noted.	Ongoing Activities
0158	Healani Sonoda-Pale		4	And there has to come a moment where we have to say enough is enough. You going keep poisoning our water. You going keep digging up our iwi. You going keep poisoning our 'āina. And you going keep playing war games -- in our bird sanctuary on Ka'ula. For what? So you can commit the same crimes you did against the kanaka around the world and you can help other people commit crimes against indigenous peoples like us, the kanaka. So it's like -- it's like what Hawaiians used to say, "You cannot eat money." 'A'ole I hiki	The Navy and NASA note your opposition to the Proposed Action. The approach to analysis in this EIS, as with all National Environmental Policy Act/HEPA (Hawai'i Revised Statutes Chapter 343) documents, analyzes the potential impacts of the Proposed Action against the existing baseline conditions. The existing baseline conditions include Navy and NASA infrastructure in the Project Area. As such, this EIS analyzes the continued existence of this infrastructure and the	General Opposition

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				ke ʻai. Better to eat the pohaku of the ʻāina, and that's what we have to start thinking. Okay? We don't -- we not going to have on our plate today. But guess what? Our kids and our grandkids going to have on their plate if we stand up today and we stay something. So I'm just here to tell you as an Oʻahu water protector who has dealt with the lies that the U.S. Navy has dealt our people on Oʻahu, mai hilinaʻi, do not trust. Aloha.	associated management activities for the action alternatives. The measures to avoid or minimize impacts from the continued existence of the infrastructure and the associated management activities are described in Section 5.1 (Existing and Continuing Mitigation Measures) of the Final EIS.	
0159	Rupert Rowe		1	Aloha to all of you malihinis, Hawaiians, and kanakas. I'm against the military presence in Hawaiʻi because the Navy has destroyed other islands besides Kaua'i. Polihale is our burial grounds for our ancestors.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) of the Final EIS summarizes the cultural consultation that was conducted with Native Hawaiians about the Proposed Action, and the Cultural Impact Assessment found in Appendix F provides more details about those consultations. These consultations acknowledge the cultural importance of Polihale, including as a pā ilina. Navy and NASA follow applicable federal law (National Historic Preservation Act and Native American Graves Protection and Repatriation Act) and State law (Hawaiʻi Revised Statutes Chapter 6E-8) for all projects located in the project area. The Navy's Integrated Cultural Resource Management Plan includes best management practices and standard operating procedures (SOPs), including SOP #7 that requires the Navy to identify impacts to iwi and historic properties and to resolve those impacts by avoiding, minimizing, or mitigating them before an action can proceed. SOP #10 is the Navy's plan regarding iwi if they are inadvertently discovered during any activity at PMRF, military or civilian.	Cultural Practices
0159	Rupert Rowe		2	Secondly, the Navy destroyed the aquasystem in Honolulu. The Navy has destroyed Kaho'olawe. Your army has destroyed Pōhakuloa.	The Navy and NASA understand your concerns regarding impacts to Kahoʻolawe, Pōhakuloa, and Red Hill. However, impacts to these areas are outside the jurisdiction and scope of this EIS.	General Opposition
0159	Rupert Rowe		3	We're the only place where you can lease our land for one dollar for your military operations in Hawaii. That is a war crime.	Thank you for your comment and concern regarding lease agreements. Information regarding the history of leases and easements can be found in Section 3.5 (Land Use and Access) of the Final EIS. As described in Section 3.6 (Socioeconomics) of the Final EIS, the fair market value will be determined in collaboration with relevant parties and shareholders when a final action is carried forward.	Socioeconomics
0159	Rupert Rowe		4	There is a treaty between the kingdom and the United States. I spoke at the Pacific Command back in '98 to honor the people that passed away. My grandmother was a Gold Star. She was the first Native Hawaiian who died in the First World War. An explanation to the commander at that time, I told him that we are not Americans. We are the only people under the American umbrella that has a blood quantum. There is no citizens of America that has a blood quantum, just the kanaka. So all the kanaka rights are very disturbing from the malihinis that come from abroad. Our identity has been washed. Our graves have been dug up. We cannot have NAGPRA here because it deprives the state on colonization. We cannot go and use -- what the state did is created its own burial counsel and appointed their people that they thought would help development in Hawaii. So as I speak to you folks, I'm not against America. I'm against the integrity of America. So the treaties that we had with your country should be honored and give the respect. When you use land in Hawaiʻi and you give a dollar for 65 years for your military involvement, that is a joke. You can't even do this in America but you can do it in Hawaii. I have more to say but I just against the whole thing. Take the military back home where they belong.	The Navy and NASA thank you for sharing information regarding your family history and familial connection to the land. The Navy and NASA acknowledge that some Native Hawaiians feel a sense of loss and injustice from continued control of ceded lands by the U.S. Government. Please see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS. The Navy is proposing to develop a process to streamline access to traditional lands through development of a PMRF Access Management Plan that balances public access and PMRF's mission requirements. Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. Finally, please note that under Alternative 1, the leases and easements would be negotiated with the State for a fair market value.	General Opposition
0160	Keahi Kuroiwa		1	Welcome, guys. My name is Keahi. First, while I have your attention, I just wanted to maybe request for the next version of the EIS that there will be maps from the	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Archaeological Inventory Survey (AIS) and Cultural Impact	Archaeological and Architectural Resources

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				Territory of Hawai‘i because there's a lot of culturally relevant information on those maps that were omitted from the state maps. So I've never seen them so I can't verify that, but it would be nice to be able to verify that because it's really developed for Hawaiians. So I think that is productive to what you guys are looking for at this meeting.	Assessment (CIA) reports, which you can find in Appendix F of the Final EIS, have some of these maps included in them. A good website that has most of these maps is the Department of Accounting and General Services Land Survey website: https://ags.hawaii.gov/survey/map-search/, another is the MAGIS (Maps, Aerial Photographs, and GIS) website through the University of Hawai‘i Mānoa at https://guides.library.manoa.hawaii.edu/magis, and other maps might be found at the Kaua‘i Historical Society. These maps were used during the research for these studies. The AIS and CIA reports have extensive bibliographies for the reference material that are cited in those reports and are included in Appendix F of the Final EIS.	
0160	Keahi Kuroiwa		2	But I also wanted to stand in solidarity with what Uncle was saying that this is occupied territory. And for that reason, for the record, I would go with Alternative 3, not renew.	The Navy and NASA thank you for your comment and your opposition to the project is noted. Your support of Alternative 3 is also noted.	Action Alternatives
0160	Keahi Kuroiwa		3	As was stated previously that the Navy did create a catastrophe in O‘ahu with Red Hill, kind of a debacle, and I think one time is enough. We don't need to get any more data from the Navy on that. So it's something that can never be put back in the box. So absolutely -- not that it's unforgivable; we can forgive it, but we're not going to forget.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. Impacts at Red Hill are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	General Opposition
0160	Keahi Kuroiwa		4	And, yeah, this is absolutely occupied and Hawai‘i was a neutral country before the United States invaded and occupied it over a century. So just wanted to put that on the record. It's not a myth; it's real. The annexation itself is a legal fiction put together by the United States government in the joint resolution but, in actuality, we're occupied neutral territory. And that should be historical fact. It's not -- it's not some fairy tale. And, yeah, just doing my part -- as a kanaka and realized that everybody here is doing their part as well. And this is not a -- this is not a competition or anything. This is just more just to let everybody know how I feel. And I'm speaking on behalf of -- of my community as well. There's really not much else to say, but I appreciate your guys' time. Aloha.	The Navy and NASA acknowledge the overthrow of the Hawaiian government and subsequent annexation by the U.S. in the Land Use and Access section of the Final EIS (Section 3.5.1, Land Use and Access/Affected Environment). The Final EIS also acknowledges the feelings of loss and injustice when ceded lands are acquired by non-Hawaiian entities in the Cultural Practices (Section 3.3) and Land Use and Access (Section 3.5) sections of the Final EIS. The Navy and NASA appreciate you sharing your thoughts on this process.	General Opposition
0161	Joshua Uyehara		1	Hi, good evening. My name is Josh Uyehara. I'm born and raised here on Kaua'i, grew up in Waimea. I've lived all my life on Kaua'i, either Waimea or Kekaha, and my mother grew up and her family is from Mānā. Growing up here on Kaua'i, I spent a lot of time camping out on Kawailoa Bay and was spearfishing off the coast. And one of the things that I clearly remember -- One of the things I remember growing up is wherever you go on Kaua'i, when you go to the PMRF, it was the cleanest beaches on the island. And when we'd go spearfishing in the waters, that was one of my favorite spots because of the abundance of the -- the wildlife in the reef. So I got a lot of fond memories as a child. And that was -- my personal experience of the environmental impact of the facility was just how well they stewarded the land.	The Navy and NASA thank you for your comment and appreciate your participation in this EIS process. Thank you for your acknowledgement of the positive impacts of PMRF long-term resource protection and natural resource management on the beaches and in the ocean. The Navy and NASA appreciate you sharing your childhood memories of Kaua‘i and PMRF.	General Support
0161	Joshua Uyehara		2	Another thing that sticks out as far as the community impact was I was in fourth grade when Hurricane Iniki hit, and one of the principal sources of relief and support of the community came through the PMRF. And we saw that, you know, coming through in Kekaha very early on when the hurricane hit, and it really helped me understand better as a child what it meant to have a facility like that in the community, even beyond its stated mission.	Thank you for acknowledging the community work done by PMRF after Hurricane Iniki. Further discussion of community engagement can be found in Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS.	General Support
0161	Joshua Uyehara		3	As an adult, I'm the current president of the Kekaha Agriculture Association. So we manage a lot of the infrastructure for the ag lands and the walls within the, I guess, facilities around the base. And PMRF has been, you know, a really good partner in preserving the open space and the agricultural use of the land around the -- around the facility.	PMRF and KPGO thank you for your work with the Kekaha Agriculture Association. Thank you for acknowledging that PMRF continues to be a good partner in this relationship and preserves agricultural land and open space around PMRF.	General Support

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0161	Joshua Uyehara		4	And, you know, more recently, as we've seen, there has been more concern and more cause for concern around wildfire. And we coordinate very well with the PMRF to fight wildfires, including the more recent wildfire above Kekaha. And very quickly, you know, some of the first response on-site came from the PMRF with the helicopters. And something that people may not know when you see those helicopters, you can sort of see -- like count, I think there were three of them, the Navy -- which -- so they had the majority of any organization, but also the lift capacity of those helicopters are significantly higher than the helicopters from the county. So in terms of total water delivered on target to help fight the fire, the vast majority came from the PMRF. So even to this day, the PMRF is a critical partner.	Thank you for your acknowledgement of the wildland firefighting provided by PMRF. PMRF Crash/Fire provides firefighting services to PMRF and, under a Memorandum of Understanding with the County of Kaua'i, PMRF Crash/Fire provides firefighting services to the County on non-Department of Defense lands.	General Support
0161	Joshua Uyehara		5	And another thing with the community impact would be, you know, so many end up coaches. So many of the people who started community initiatives for the enrichment of the children -- including myself, and I was one. One of the flanked members of the PMRF sadly, you know, passed away some years ago; it was a man named Stu Burley. And he helped set up many of the educational programs that benefited the children here on Kaua'i. So those are the kinds of impacts that I personally faced.	Thank you for your comment.	General Support
0162	Kiele and Pualoke Hirata		1	Aloha mai kākou. My name is Kiele. This is my mahoe so you'll always see the both of us. Mahalo for making the accommodation for us to speak and for allowing her to give me her time. I am a ho'opa'a[?] from the moku of Halele'a. I have 'ohana that stretches all the way around the mokupuni of Kaua'i. So first off, I am happy that the kanaka who are from the community of Kekaha and the west side are here tonight. This is their time. And for sharing that time with me, I will be relocating to that side which is why I made a priority to come here tonight. As a kanaka, it is our kuleana -- this is a word you guys used in your presentation -- it is our kuleana to always do our best. Ma ka hana ka 'ike, it is in the doing that we learn. It is in the doing that we show the kanaka of any 'āina, any Kanaka 'Ōiwi, the native people of any land that we mean what we say. I ask questions, simple questions. Okay? I wasn't asking for number this -- okay, I was a little bit.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA respect your concerns related to the analysis.	EIS Process
0162	Kiele and Pualoke Hirata		2	But the simple question is how are you showing the community of this 'āina that you maopopo, you understand what the word "kuleana" means? What are you doing to malama not just the 'āina, not just the things you see from mauka to makai, below the kai? Because we all know that you guys are doing practice missile launches four times a year on the record; off the record, we don't know. Then where are they? Are you cleaning it up? Simple. A'ole.	The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Launching operations are discussed in Public Health and Safety (Section 3.9.1.4.1, Existing Conditions). The Federal Aviation Administration is informed of all above-surface missile launches, and missile range operators are in direct, real-time communication to ensure the safety of all aircraft. All launches are scheduled to ensure that the ground hazard areas surrounding the launch pads are clear. The Hawaii-California Training and Testing Final EIS/Overseas EIS, Appendix A, *Military Readiness Activity Descriptions*, provides extensive detail on launch operations conducted at PMRF. This document is publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Public Health and Safety
0162	Kiele and Pualoke Hirata		3	I took a piece of paper. I crumpled it up, the paper you guys handed out to us, and I showcased it to one of your workers. I said, this is what you're doing. You're coming here, you're saying this in your reports. I crumpled the paper and I said "Look." And then you're asking us, "Can we have this place for longer? Can we extend our stewardship over this wahi, this place? I say no, no. When you crumble a piece of paper that's freshly printed with beautiful ink, it looks aesthetically pleasing but what we see is kapulu. It's not kuleana. It's not aloha. I speak with vigor, not with blame. Blame is not the -- the mana'o of kanaka. If we wrong, we say it and we show how we're going to fix it. Mihi, mihi is a process of forgiving, but we cannot forgive and forget. And why should	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action. The Navy and NASA appreciate the importance of long-term resource protection and discuss this in various places in the Final EIS including in Environmental Management and Protection (Section 1.3.6, Background) and in Ongoing Community Coordination (Section 1.7.5, Public and Agency Participation and Intergovernmental Coordination). There are also extensive discussions of long-term natural resource protection in Biological Resources (Section 3.4) and Archaeological and Architectural Resources (Section 3.2) of the Final EIS. Cultural Practices (Section 3.3) includes a discussion of traditions or living expressions of a community that are inherited from ancestors and	General Opposition

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				we, if you never show us on a piece of paper or by your own two hands and feet and kilo and as a collective that you know what the word "kuleana" means. It takes more than words, numbers, reports, computers, research. The ʻāina is telling us just from the landscape alone. Look at the kanaka that live there. Do they have wai that's running from their piece of property? Do they even have a land to call home? No. We do not. And lucky for us who do.	passed on to descendants—things that people do within the environment that are guided by their culturally-specific understanding of the world and a Cultural Impact Assessment was prepared for the Project and included in Appendix F of the Final EIS.	
0162	Kiele and Pualoke Hirata		4	Our ancestral burial lands, it was a common practice. You cannot say you do not know. That means you're ignorant. Ignorant is bliss to those who do not care. And if that is you, hue kala mai, unacceptable.	Thank you for your comment. The Navy and NASA acknowledge the importance of cultural sensitive places and Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS discusses the importance of Nohili dunes as a spiritual place and how the Navy, in collaboration with Na ʻOhana Papa O Mānā, respectfully re-inters exposed remains in the Lua Kupapaʻu O Nohili crypt located on base. The EIS encourages you to reach out to PMRF if you would like to be part of the ceremonies held there.	General Opposition
0162	Kiele and Pualoke Hirata		5	It is not our job to leave our waste and all this trash whether it's on the land, in the sea, above us because you're poisoning us with the chemicals once do you the explosion. And if you understand the water cycle which is basic science from elementary school, that all gets cycled through in our runoff. Koke'e, you ever went there to go and pick maile? It's dry. That is what we're known for here in Kaua'i. The plants are speaking to you. The water is speaking to you. The kanaka come to speak to you. But if you do not ho'olohe and listen, what for? Then you grumble and you grumble when you have this feeling, this 'eha. It's not coming from nowhere. Just know that we as kanaka are not for the abuse of our ʻāina or our kanaka. We deserve better. Not from you. The ʻāina is here and has been preserved because we made it our mission. And then you come along and you abuse it. You guys understand what an abusive relationship is. Yes? Not healthy. The ʻāina is not healthy right now. And the only people who can help to fix it are those of you who made it that way in the first place. So no to extension of your stewardship over the ʻāina, but yes, please yes, take your kuleana and fix it by cleaning your mess up, above and below, from mauka to makai, the air, the deep sea, and the kanaka. Show us from your own two hands and feet and all the intellect that you have and the technology that you can fix and make it better than how you found it. It was pristine. It is not the same. We deserve better and so do you. Please do not consider the PMRF or any place that you go to on this island that's beautiful. Yes, we live in a beautiful place but it can be better. It will not be developed and under the wrong stewardship. Otherwise, it will be taken from us and we will not have this place to enjoy. So, please, ʻauamo your kuleana. Mahalo.	The Navy and NASA thank you for your comment. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. Also, discussion of impacts from water runoff is discussed in Section 3.7.1.4 (Water Resources/Existing Conditions) of the Final EIS.	General Opposition
0163	James G. Trujillo		1	It's James Gerard Trujillo, for the record. I'm not going to add anything that you didn't hear from the woman previous. The previous testifier said it -- said it much better. I immigrated here 25 years ago. I'm a resident alien to Hawaiʻi lands. As a citizen, I protest that this is going on while native people oppose that. So I cannot speak in favor. I can only ask that you guys do not renew the lease, that it does not carry on the way it has, and that you listen to the kanaka maoli and their story and their desire to have their land back. Thank you.	The Navy and NASA appreciate your participation in the EIS process and note your opposition to the project. As stated in Section 1.7.5 (Public and Agency Participation and Intergovernmental Coordination/Ongoing Community Coordination) of the Final EIS, the PMRF Cultural Resources department demonstrates extensive community outreach efforts by actively engaging with various stakeholders. They coordinate with lineal descendants and representatives of local cultural groups, attend community meetings, and consult with Native Hawaiian Organizations in the event of requests to visit culturally significant areas or significant discoveries. As part of the analysis for this EIS, a Cultural Impact Assessment was prepared and is included in Appendix F of the Final EIS.	Action Alternatives
0164	Klayton Kubo		1	Klayton Kubo, Waimea, Kaua'i. I like say something about the fisher-gatherer perspective, hunter-gatherer perspective. I want to see you guys give more access to the fisher-gatherers, hunter gatherers.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which	Land Use and Access

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				I want access because as a young child growing up on the west side of Kaua'i -- I am from Waimea. There's no other place I can call home. So I remember going to -- always accessing PMRF with my grandparents, with my father, my mother. You know, it's like -- then all of a sudden we get, like, cut off because the new captain coming and say, Oh, no, the rocks is damaging the aircraft. Like, how many years that was going on that we was doing that? That's what I want to see. I no like come over here, continue coming to this kind meetings, and just keep talking and talking and talking and you guys no take action. I hoping that you guys going do something about that. We need more access. What is this $25? I went pay that one time and I said, why am I paying to go gather? I asking that question right now. I hope you guys going -- can do something about that. And that's from a hunter perspective now. I hope you guys going give us more access because, hey, Josh Uyehara guys need help because of the goats. And I heard that twice to my face. From my fire, I saying the names now. So, come on, give us more access. And I know, you know, how's this one? My son is Native Hawaiian but I don't want to go there because it's my son. But I can just imagine maybe he going come, maybe even more loud than me. But, please, give the hunters, the fishers access. Oh, I got to look at you for I know how much time. But normally, when I testify at state capital, whatever, I no even use like -- I look forward to conversating with you more. And I take you -- please take me serious. Mahalo nui.	allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapuaʻa Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. As described in Sections 3.3 (Cultural Practices) and Section 3.5 (Land Use and Access) of the Final EIS, the Proposed Action does not change public access at PMRF. The $25 processing fee for a guest pass covers the cost of the required background check for all applicants. All residents and visitors applying for a Naval base guest pass must be a U.S. citizen and at least 18 years of age. When the applicant has passed the security background check, a PMRF guest pass is issued to the applicant. For updates, hours, and access information, call the Pass and ID Office at 808-335-4229. In response to comments on the Draft EIS, the Navy and NASA have clarified measures to supplement the existing environmental protections at PMRF and KPGO. These measures, Enhanced Engagements, are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-2 discusses streamlining access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil. The Navy and NASA look forward to working with you and other community members in the development of the Access Management Plan.	
0165	Sherri Cummings		1	Sherri Cummings for the record, Kapo'o, Kaua'i. So I did something but I want to reiterate it again because I think there's a reason why I left out (audio difficulty) because I need to acknowledge my kupunas. So I'm going to go again for the record and say that I will challenge -- I will challenge the ownership of Ni'ihau. I will ask PMRF to do your due diligence and look into what's the record. I will repeat the royal patent, 2944. It is not the state's land. It is part of the fee simple. You folks should know all royal patents, all kuleana, all land commission awards are off the table.· They're not part of the 1.8 million acres that is supposedly ceded to Hawaii. That's number one. James McHutcheson Sinclair had a daughter. I gave you folks the birth certificate and the death certificate that shows my forefather. The daughter's name was Sarah Sinclair, born 1863 October 31st. She had a daughter, one of 12 living; 16 children she had. She was married to William Charman. My grandmother's mother was number eight of 12 living, Elizabeth Kapeka, who married a Taniguchi. She had my grandmother, Miriam Ethel, who was born in the year 1916 who had my mother, Ruby Kawai'ulailiahi Pia, who is very grounded to Waimea. And then myself, Sherri Cummings. I have four children. My oldest, I will claim him, Russ Michael Keali'i Mahuiki-Cummings, who's related to the two that testified so bravely. And they have ʻohana with ties to Ni'ihau as well. He has his oldest son, Kaneaukinoko Cummings. We are lineal descendants to James McHutcheson Sinclair. His wife is Nako'oko'oku'okalani who is the daughter -- who is the daughter of Kalehuna Aukai -- she had the name because she was persecuted by Kaʻahumanu -- who had a mother whose name is Kalehuawehe who is the shore break, the surf break right outside Wailua. She comes in as a wave. My family on my tutu man's side is very grounded to Ni'ihau. I did name them. I don't want to need any more clarifications but just to say for the record, the rightful owner	Thank you for your comment. The Navy and NASA acknowledge your family history and respect your concerns related to other military installations. However, matters regarding Niʻihau are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	EIS Process

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				is James McHutcheson Sinclair. There is no collateral descendants regarding those types of land instruments. And as far as what the prior testifier testified to, my tutu lady Hōʻaʻa had a brother Hunuikaimana. He was the practitioner of feather making. He was the one that kept the trails open. They called him a male runner from Kona to Halele'a.		
0165	Sherri Cummings		2	The access was open because the practices were dying and the kanaka had access. Pay attention to who you folks having as the ones to authorize. Make the ʻohana bigger. Go after the families. The families is bigger than what you guys have listed in there. I ask -- and I look at you, Kaulana -- we had a conversation before. I asked you, Thomas. Our ʻohana ties right into there. We were never on the table. Put us on the table.	Section 3.3.2 (Cultural Practices/Environmental Consequences) of the Final EIS summarizes the information shared with the Navy and NASA about cultural resources and practices, and impacts to them in the Project Area. More details are available in the Cultural Impact Assessment report found in Appendix F of the Final EIS, including details about the consultation process, the groups and individuals who were consulted, and topics that participants in consultation shared with the Navy and NASA. Public comments have been incorporated into the Final EIS.	Land Use and Access
0166	Dianne Deauna		1	I'm a student at UH Manoa. And I would like to ask some -- I have some suggestions for the EIS. I was wondering if in the final version you could have a comprehensive review of the number of strandings for marine mammals that have been observed as well as is there data on -- I hope that data can be included on the invasive species that have been treated or -- like what are the significant strides that the military's made to reduce the invasive species? I was looking for more, like, hard numbers.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. Effects to marine resources, such as strandings, from the Navy's offshore ongoing activities were analyzed in previous National Environmental Policy Act documents and are presented in Table 1-5 of the Final EIS and discussed in detail in the 2018 Hawaii-Southern California Training and Testing Final EIS/Overseas EIS (OEIS). This document is publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents. To review additional studies in the area, visit the Navy's Marine Species Monitoring Program website (https://www.navymarinespeciesmonitoring.us/), which serves as an online portal for information on the background, history, and progress of the program, as well as provides access to reports, documentation, data, and updates on current monitoring projects. Invasive vegetative and wildlife species are targeted for removal by the Navy and NASA Natural Resource staff on fee simple lands, leaseholds, and utility easements. Benefits to natural resources from conservation measures and best management practices are discussed in Table 2-7 of the Final EIS. These include native habitat protection prevention of introduction of invasive species introduction. A list of recent invasive and/or non-native species can be found at the end of the flora and fauna surveys conducted at PMRF and KPGO and an additional list of species targeted by PMRF and KPGO can be found in the 2023 PMRF INRMP. All of these documents can be found in Appendix K of the Final EIS.	Biological Resources
0166	Dianne Deauna		2	And I also would like to suggest that in terms of social, economic, and cultural impacts, there seems to be a lack of acknowledgement of the positive effects, like it just says there that there are some -- like, to quote from the report, it says: "Some Native Hawaiians may feel that the return of the lands have beneficial -- and have beneficial effects." And I think it is the responsibility of the military to actually include those perspectives from quote, unquote, "some Native Hawaiians." As we have seen, there are plenty who feel very strongly about this EIS. And so their voices should be included in the final EIS and the beneficial effects of returning the land to the state and to -- under control of -- beyond the military should be expanded upon and -- yeah. Thank you so much.	Section 3.3.1.4.2 (Cultural Practices/Public and Native Hawaiian Participation) of the Final EIS summarizes the cultural consultation that was conducted with Native Hawaiians about the Proposed Action, and the Cultural Impact Assessment found in Appendix F of the Final EIS provides more details about those consultations. Public comments have been incorporated into the Final EIS.	Cultural Practices
0167	Tara Rojas		1	Okay. So I heard you say in your introduction that, you know, they were common lands. These are still Crown Lands. And the mention about sugar plantations, those plantations are on -- or are -- or were unlawful, illegally occupied, and seized lands. The first and the main and only info you need to include in this DEIS is that Queen Liliuokalani was what? Threatened at gunpoint. To do what? She was under duress by	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and military activities. Impacts at Red Hill, Pu'uloa, and Pearl Harbor are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	General Opposition

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				you all. And at what cost? Bloodshed which is what you guys are doing by training. It's to really, literally bloodshed. So no matter what you say, no matter what, you were right, your presence here, military, Navy, since 1893, that's 132 years, your presence is the threat and continued trauma. Your admiration of this beauty and your kuleana to protect this place, as you all said, is only possible by you leaving. Remove yourself physically, 2029. You Navy are not the caretakers, as you mentioned. You all are the polluters: Red Hill, Pu'uloa, Pearl Harbor, your Remediation Advisory Board, your RABs, the pollution of the ocean of the kai and the water and the wai. You literally are the terrorizers physically, mentally, emotionally, and spiritually. Kaho'olawe and now Ka'ula, too? And you want to increase the bombing on Ka'ula? It would be like, "you got to be crazy," but that's literally what you guys are asking and doing. George Helm, anybody watch "Hawaiian Soul"? Not watch it and remember. Navy, what happened to George Helm? So these millions to the economy that you said you contribute, this is literally blood money. Ew, like, a'ole. No. Again, at the expense of forever, desecration, destruction, and contamination. And the proof is look around you. So wake up, speak up, kanaka. Resident allies, stop taking this blood money. Like -- you know, it's like if we have to name, you know, names. But -- and any other sellout bought out -- so excuse me, employee, contractor, cultural consultant, individual, and organization at the expense and the erasure of fulfilling these unlawful procedures by the state -- illegally-occupying state. And again, just finally, there is no boundary off limits of talk. So we can talk about when you, Navy, military, have already crossed every boundary. So water management, you say? What's the most affected? By the way, that water management does not belong to you. You should not have control of the water, Red Hill; right? The water management -- the best way is to leave, literally. Leave the islands, 2029. So from the first bomb you dropped in the name of "training," quote, unquote, to the last bomb you drop, this is terrorizing. And end this 2029. It's hewa. Mahalo.	As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities. Additionally, the Final EIS includes a detailed description of ongoing Best Management Practices (Section 2.5) as part of current activities that would continue under the Proposed Action to protect water resources. Enhanced Engagement-5 (Table 5.2-1) establishes a Working Group to collaboratively manage water resources in West Kaua'i. Also, the Water Resources section in the Final EIS (Section 3.7) includes a detailed description and ongoing effects to water resources within the Project Area.	
0168	Tia Marie Masaniai-Estrera		1	Aloha e. My name is Tia Marie Namahana Masaniai-Estrera. I'm affiliated with Hawai'i Peace and Justice and E Ola Kākou Hawai'i but speak tonight on behalf of myself as an individual. After this testimony on the draft EIS concerning PMRF in Mānā, Kaua'i, since you folks are not answering questions, consider this a lawful public notice. This process is unfolding on Hawaiian lands that were seized without consent, never lawfully ceded, and still under illegal control. Some folks may feel like these statements fall on deaf ears, but I believe, like many others, that the truth will prevail. Every federal, state, and military official who has sworn an oath to uphold the U.S. Constitution is actively violating that oath. I spoke to the specific violations in my testimony on Tuesday and will be submitting written testimony as well.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and respects your concerns regarding historic use of these lands; however, at this time, the land is under State jurisdiction and Department of Land and Natural Resource (DLNR) holds the real estate agreements with the Navy and NASA. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	General Opposition
0168	Tia Marie Masaniai-Estrera		2	Let's talk about the word the military keeps throwing around, "encroachment." You say that Native Hawaiian communities might be encroaching on military-controlled zones. That is pure distortion. It is you who are the encroachers. The U.S. military is the invasive presence pushing into our ancestral lands, polluting our waters and shutting us out of the places we've had relationships with for centuries. Your missiles, your sonar, your fences, and your radiation do not belong here.	Your opposition to military presence at PMRF and the use of the term "encroachment" is noted. Section 3.3.1.2 (Cultural Practices/Regulatory Setting) of the Final EIS discusses federal and State laws and regulations addressing Native Hawaiian traditional cultural practices and associated resources. Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes coordination of access to PMRF and KPGO for cultural practices. The development of a PMRF Access Management Plan (see Enhanced Engagement-2 in Table 5.2-1 in Final EIS) will	General Opposition

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					streamline access to traditional Hawaiian cultural practitioners to PMRF in a way that balances public access and PMRF's mission requirements.	
0168	Tia Marie Masaniai-Estrera		3	We are told this base helps protect national security and supports the local economy; that's deception. Whose security? Whose economy? Let's be honest. The only thing secure is your funding. The jobs, contracts, and help in time of natural disasters you all offer come at the cost of generational harm. The, quote, unquote, "good impacts" are far outweighed by the hewa.	The Navy and NASA thank you for your comments and appreciate your participation. The Navy and NASA respect your concerns related to the local economy, security, and environment. As described in Chapter 2 (Proposed Action and Alternatives), Alternatives 1 and 2 would not change any use or maintenance of existing infrastructure and would not involve construction, renovation, or demolition of facilities. The potential effects from all alternatives are analyzed and compared in Chapter 3 of the Final EIS.	Socioeconomics
0168	Tia Marie Masaniai-Estrera		4	You're poisoning our aquifers, you're killing our reefs, you're degrading fish grounds, you're forcing our people to live next to weapon-testing zones and calling it safety. That's not protection, that's not progress, that is destruction.	The Navy and NASA note your opposition to the Proposed Action. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Launching operations are discussed in Public Health and Safety (Section 3.9.1.4.1, Public Health and Safety/Affected Environment). The Federal Aviation Administration is informed of all above-surface missile launches, and missile range operators are in direct, real-time communication to ensure the safety of all aircraft. All launches are scheduled to ensure that the ground hazard areas surrounding the launch pads are clear. Effects to marine resources were analyzed in previous PMRF National Environmental Policy Act (NEPA) documents and are presented in Table 1-5 of the Final EIS. These documents incorporate mitigation measures in place to reduce adverse effects. The 2025 Hawaii-California Training and Testing Final EIS/Overseas EIS analyzes environmental effects of at-sea military readiness activities on marine resources and is available on the EIS website at https://pmrf-kpgo-eis.com/documents.	Public Health and Safety
0168	Tia Marie Masaniai-Estrera		5	According to your own laws, traditional and customary practices must be protected, but your operations restrict our ability to gather, to fish, conduct ceremony, and care for the ʻāina like we have been in relationship with for centuries. These aren't just cultural practices; they're living laws, and you're breaking them. If I were able to ask a question and receive an answer, I'd ask every po'e haole sitting on that table tonight, "Where are your ancestors from?· How would you feel if we came there to dig up their bones? What would you do if we poisoned the water that feeds your family, blew up the land that shelters them?" The truth is you all do not feel the same heaviness as we do because you can leave. You can go back to Michigan, Missouri, California. And you guys, when you do to our peoples and our lands and our practices, we'll be out of sight and out of mind for you. Not for us, not for those of us who are of this land and those of us who have made this place our home. We know our kuleana -- the true essence of the word, not just reading it from one script. I'd ask every Hawaiian -- standing behind this project, is it worth it? Is the paycheck worth your integrity, worth the poisoning of your own kids, your own grandkids, your own lands and waters?	Section 3.3.1.2 (Cultural Practices/Regulatory Setting) of the Final EIS discusses federal and State laws and regulations addressing Native Hawaiian traditional cultural practices and associated resources. Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS describes coordination of access to PMRF and KPGO for cultural practices. The development of a PMRF Access Management Plan (see Enhanced Engagement-2 in Table 5.2-1 in the Final EIS) will streamline access to traditional Hawaiian cultural practitioners to PMRF in a way that balances public access and PMRF's mission requirements.	Cultural Practices
0168	Tia Marie Masaniai-Estrera		6	This EIS process must address the whole scope of damage, not just environmental but spiritual -- genealogy -- genealogical, and legal. We reject the normalization of militarization on Hawaiian lands. We reject the false narrative that you lawfully belong here. The U.S. Navy has historically annihilated our ʻāina -- Kaho'olawe, Red Hill, Mānā -- with no show of so-called good faith to clean up their mess. In fact, a lot of their own data -- shows they do not even have the technology to --actually do so. I'd also like to kako'o everything the first two testifiers shared. You're not welcome to expand. You were never given rightful access to begin with. Obey your own laws and ours. Mahalo.	The Navy and NASA conducted a comprehensive analysis that looked at the impacts that would result from the Proposed Action in accordance with regulations under HEPA (Hawaiʻi Revised Statutes Chapter 343) and NEPA. The Navy and NASA understand your concern about impacts outside of the Proposed Action; however, impacts at Red Hill and Kahoʻolawe are outside the jurisdiction and scope of this EIS.	General Opposition

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0169	Kaneali'i Williams		1	Okay. Aloha kākou. My name is Kaneali'i Williams. I'm a lineal descendant of the Kapalehua ʻohana and Waimea Kaua'i. And within my ʻohana, we are ʻohana to Papapa, Ni'ihau, and have our lands on Ni'ihau that we have claims to. I -- I like you guys on -- whoever's your tech person who's managing your folks e-mail account, if you can send me a response to my written comments that I provided via e-mail so I have receipt of that. And, also, if you folks can acknowledge that in front of the audience as well so we have that on record that you did receive my communication.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA received your email and responded on July 18, 2025, with the message "Confirming receipt of your comment." The Navy and NASA appreciate your engagement in this process.	EIS Process
0169	Kaneali'i Williams		2	I'm going to start by saying that I think this EIS is complete BS, and the reason why I'm saying that is because of the previous draft environmental assessment you folks did for Ka'ula where so much of it was written about insignificant impact, this and that. But in my meetings with PMRF after the due process, your staff admitted to erosion that has occurred on Ka'ula to one of our cultural sites, one of the caves that is documented by DLNR, and not being able to locate that cave again. And so I -- I don't trust this EIS because I don't trust the words that are written by PMRF just based off of my meetings with you folks privately for Ka'ula.	The Navy and NASA thank you for your comments and appreciate your participation. The Navy and NASA note your opposition to the Proposed Action and respect your concerns related to other military installations. However, impacts at Kaʻula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kauaʻi Island. Effects to resources on Kaʻula Island from military training were analyzed in the PMRF Land-Based Training and Testing EA. A link to that document can be found in Table 1-5 of the Final EIS. More information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	EIS Process
0169	Kaneali'i Williams		3	I heard earlier about, you know, there's $173 million funding that you guys provide to the economy of Kaua'i. That's just a bunch of propaganda. I want to see in this EIS an audit detailing information regarding where all this money is going specifically. I want to see salaries of personnel. I want to see who's getting paid off. Our people are owed reparation. So $173 million, when you're trying to tell us that that's a lot of money, it's not. We are owed reparations for everything that has been done.	As described in Section 3.6 (Socioeconomics) of the Final EIS, employment at PMRF and KPGO are in the professional, scientific, and technical services industry. Continued operation of PMRF would continue to benefit the Region of Influence economically by providing employment (approximately 900 personnel) and expenditures of approximately $150 million annually on salaries, contract goods, and services. The Navy and NASA thank you for your comments and appreciate your participation. The Navy and NASA respect your concerns related to the economy of Kauaʻi. Although an audit of PMRF is outside the scope of this EIS, the Navy and NASA encourage you to reach out to the Public Affairs Office at PMRF with any questions you have about PMRF's contributions to Kauaʻi.	Socioeconomics
0169	Kaneali'i Williams		4	You telling us that you guys are contributing to natural resource conservation, it needs to be very clear that the reason why our lands and resources need to be conserved is because your guys's presence is constantly destroying it. That is the case with Ka'ula. That has been the case with Ni'ihau, the waters around Ni'ihau.	The 2023 PMRF Integrated Natural Resources Management Plan has been added to the Final EIS in Appendix K, and details regarding natural resource conservation may be found there. The Navy and NASA also respect your concerns related to other military installations. However, impacts at Kaʻula Island and Niʻihau are outside the jurisdiction and scope of this EIS.	General Opposition
0169	Kaneali'i Williams		5	My ʻohana, we tie back to Ka'ililauokekoa -- my father Kalaniali'iloa of Kaua'i. He was raised in Waimea. And I heard that your folks are bringing up ʻohanas of Kona. So our ʻohana has deep ties to the Kona district and traveled through Kaulakahi Channel to Ni'ihau. Kalaniali'iloa brought Kapuaokalani, the ali'i of Ni'ihau, back to Kaua'i, resided in Waimea. They traveled back and forth through the Kaulakahi Channel that PMRF is impacting and has been impacting. So these are just things that you guys need to think about.	The Navy and NASA appreciate your sharing of your moʻokūʻauhau.	Ongoing Activities
0169	Kaneali'i Williams		6	I also need confirmation that you received my e-mail. I need it via e-mail. I need that receipt immediately. So if you guys can confirm that right now for me, I'd appreciate that. Mahalo.	Thank you for your comment. The Navy and NASA received your email and responded on July 18, 2025, with the message "Confirming receipt of your comment." The Navy and NASA appreciate your engagement in this process.	EIS Process
0170	Emma Koa		1	Okay. Aloha kākou. My name is Emma Koa for the record. I just want to start off by addressing every kanaka giving testimony, every ally, every person brave enough to be the voice for kupuna and Ko Hawaiʻi Pae ʻāina. Mahalo piha and mahalo pono for your choice to 'auamo kuleana and to noho kulana even when it's grievously uncomfortable for us. I also want to address every Hawaiian	The Navy and NASA thank you for your comment and appreciates your participation in the EIS process.	General Opposition

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				that's comfortable taking a paycheck to sell out your own people. I want to make sure that you specifically are listening and understanding the hewa that you're co-signing.		
0170	Emma Koa		2	Kaho'olawe, Red Hill, Ka'ula. Trust is at an all-time low in military and kanaka relations and the tension is at an all-time high. What a time for you guys to ask for more. What a time for you guys to have the nerve to ask for more land, more time, more destruction, more death, more hewa. If sacred means nothing to you -- because I know that these meetings are just a formality. I know you guys go into your rooms after this and you say, "Oh, how stupid was that. What a waste of our time was that." Right? So if sacred means nothing to you, then how about ruining the ecosystems for the ʻāina and the oceans, subterranean, and everything in between? How about there will be nothing left for you to make money off of if you continue to desecrate and destroy Hawaii? There will be nothing left for you to practice and study killing off of if you continue to do this to Hawaii. Hawaiʻi will not be Hawaiʻi much longer without Hawaiians as stewards of this ʻāina. You bomb, you bomb, you bomb until no more nothing left, and then you cry when no more nothing.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill, Kahoʻolawe, and Kaʻula Island are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. Effects to resources on Kaʻula Island from military training were analyzed in the PMRF Land-Based Training and Testing EA. A link to that document can be found in Table 1-5 of the Final EIS, and more information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. The Navy and NASA are presenting Enhanced Engagements in the Final EIS under the action alternatives to promote protections for the land. These measures were developed based on feedback received from the public during the scoping and public comment periods. These measures were referred to as Enhanced Management Measures (EMMs) in the Draft EIS and in the Final EIS they have been renamed and further developed based on public comments. The revised Enhanced Engagements are discussed in Chapter 5 and listed in Table 5.2-1 of the Final EIS. Specifically, Enhanced Engagement-4 discusses the development and continuation of PMRF Kauaʻi which seeks to establish regular communication channels to strengthen relationships with the Native Hawaiian community, and other interested stakeholders. The Navy and NASA value participation and meaningful engagement from the community. The public meetings held recently in July 2025 on Kauaʻi following publication of the Draft EIS, were not required by the EIS process, yet the Navy and NASA prioritized community and public involvement during this process. As discussed in Sections 1.3.6 (Background/Environmental Management and Protection) and Section 3.4 (Biological Resources) in the Final EIS, the Navy's efforts to protect natural resources at PMRF and KPGO include the involvement of the Department of Defense's Readiness and Environmental Protection Integration Program which facilitates long-term, collaborative partnerships that preserve important habitats and natural resources, support sustainable and productive land uses, and promote resilient natural and working lands and waters for installations and their surrounding communities.	Biological Resources
0170	Emma Koa		3	How many times have I gone to be in service in reciprocal aloha ʻāina and come across unexploded ordnances in spaces that belong to the gods? PMF's everywhere. The way you guys show us all how to destroy and destruct should be studied and documented, except it already is, in ʻāina and in kanaka. We have been watching and studying and the overwhelming consensus at this point is that your time is up. This is not a question any longer. This is a formality on our part as kanaka. The overwhelming mana'o is no more military. Clean up, give back, and pack up. This is simply the beginning of the exit plan of the United States and the U.S. military from Hawaii. ʻĀmama ua noa lele wale. Mahalo.	There is no unexploded ordnance on leasehold or easement lands in the Project Area. The Navy strives to provide long-term resource protection, and works with neighboring communities to respond to requests for cleanup. For example, in late 2022, the Department of Hawaiian Home Lands (DHHL) identified debris from an almost 60-year old missile on DHHL lands in Niu Valley, Kauaʻi. After discovery, PMRF organized an immediate Explosive Ordnance Disposal response, and determined that there was no immediate threat to the public or the environment, and began removal planning. In 2024, the PMRF Public Works and Stewardship office partnered with a local business and volunteers to clear approximately 2,300 pounds of debris from the site, and all recyclable debris was disposed of properly at a recycling center in Līhuʻe. This removal effort will allow for more effective land use for DHHL, and demonstrates the Navy's commitment to response, recovery and safe disposal of military debris.	General Opposition
0171	Keʻanolani Aquino		1	Hello? My name is Ke'anolani Aquino. And I'm just here to tell you that the only option to protect our future is to discontinue this occupation. I ka wā mamua. I ka wā	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action	General Opposition

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				mahope; right? There's a well-documented history of the desecration to our land and what it does and what needs to happen. I want to know. There's a well-documented history of how they treat this land. You guys do not train to plant food. You don't train to clean up nothing. You just train to kill and kill again. They will continue to desecrate and to exploit and to blow up until -- until when? What does that look like on an island? That's a rhetorical question. And, honestly, that's my stance. And I just want to address all of the testimonies that I've heard and all of the kupuna and all of the makua that show up. And I want you to know everything that you guys have done, it will continue and it will continue. And this damage, it compounds, and it only grows blatant and -- blatant. And we learned this with Red Hill. It just grows and it grows until babies are being rushed into the ER with radioactive rashes, until people are being poisoned. It doesn't need to get to that point here on Kaua'i. It doesn't need to, but it will. If nothing is done, it will. So tell 'em. They want to keep -- they want to keep this land. What will it take for them to leave? We have nowhere to go. We cannot up and leave. So thank you -- thank you. Thank all of the kupuna for upholding your kuleana. And I know that this feels like a burden, but it is a privilege to care for something -- and love something this much. And there's a reason why you probably don't and you cannot do nothing, because you don't have kuleana. You do not have the privilege of loving something so much you would give your life for it, that you would care for it, that you would steward it. You don't, and that is why you're haole. But I hope one day that you can -- you can feel the privilege of loving and caring for something. But until then, you need to leave. They need to leave before it's too late. E ola.	and military activities. Section 1.3.6 (Background/Environmental Management and Protection) of the Final EIS describes the environmental management and protection conducted by the Navy at PMRF, and Section 2.5 (Best Management Practices) includes a description of the Best Management Practices the Navy and NASA use to reduce the environmental effects of designated activities, functions, or processes in the Project Area. This information is included to demonstrate the Navy and NASA's ongoing commitment to meet compliance requirements, set management goals, complete required actions, and to protect and manage the natural and cultural resources on the installation. The Navy and NASA respect your concerns related to other military installations. However, impacts at Red Hill are outside the jurisdiction and scope of this EIS. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities.	
0172	Melissa Tomlinson		1	All right. Aloha mai kākou. I'm Melissa Jean Tomlinson. Hello, everyone. I am calling in from California to essentially, like, reject your EIS, reject -- I -- like, everyone's testimony from the first night, I just -- I'm -- like, strongly support all the kanaka there that have called in and that have given all their mana and 'ike and mana'o on the truth, and that is that you all need to leave the Hawai'i pae'āina. It is an illegal occupation. There are people -- there's a large amount of Native Hawaiian population on the continent that don't want you there. There's also other people in the United States that don't want you there. There's people all over the world that don't want you there because you don't belong there. How you got there to begin with was hewa. It was wrong. It was -- there's not enough words. There's not enough words.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action.	General Opposition
0172	Melissa Tomlinson		2	And, like, something from the first night's just really been sticking with me, partially probably because I spent a time being a firefighter. But one of the kanakas that called in that was just, like, extending the gratitude for the work that you all have done to help with putting out fires and such and, you know, there are actions that can be expressed gratitude for.	Thank you for recognizing services provided by PMRF. PMRF Crash/Fire provides firefighting services to PMRF and, under a Memorandum of Understanding with the County of Kaua'i, PMRF Crash/Fire provides firefighting services to the County on non-Department of Defense lands.	Public Health and Safety
0172	Melissa Tomlinson		3	But the reality -- and the same thing with that, whatever, 173 million that you were saying you provide. I mean, we could probably add up all the military there and they could put up a number and it would never, never equal the amount that you take. You all take so much money from us. The amount of money that the military receives is like -- it's -- it's unacceptable. It's unacceptable. And I think as an entire population of people across the entire world, none of us agree with what's happening with our money being taken and being given to a military-industrial complex that is warring all over the world and funding genocide and it's just for what? Again, like, people have said it, for future generations. What does that do for them?	The Navy and NASA thank you for your comments and appreciate your participation. The Navy and NASA respect your concerns related to the analysis.	Socioeconomics

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				Are you protecting anyone? Are you actually protecting anyone? Because I don't think so. My dad was a Marine. And, like, I want to be, like, ooh, yeah, honor. There's something honorable. And I really struggle with what I've witnessed over the years and from what I've learned, especially, especially from what happened in Hawai'i in 1893. Where is the honor? Like, I don't -- I -- it's how can we support you in being there? Like, how? Mahalo.		
0173	Shyanne Olores		1	Aloha. My name is Shyanne Olores. I'm a descendant of Mānā , of Nohili, of the Hawaiian Kingdom, and I'm here today to speak, not just for myself. I speak on behalf of my ancestors who were born and raised and buried on the lands now fenced off and desecrated by the U.S. military. My grandparents were the last in our 'ohana to live in Mānā town. I was raised in Nohili, fishing and gathering along the shore, visiting the sand dunes where the bones of our ancestors rest. My father and his brothers hunted the Mānā tunnels to feed our family like their fathers before them. This land raised us. This land remembers us. And we remember it. But now I can't even visit the resting places of my ancestors. I cannot gather from the shorelines I was raised on. I cannot access the land that shaped my family, my culture, my spirit, all because the U.S. military's occupation of stolen land.	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciate the information you provided about your family lineage. The Navy and NASA respect your concerns regarding military operations and cultural practices. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS. As described in Section 3.3 (Cultural Practices) of the Final EIS, PMRF began the Morale, Welfare and Recreation Guest Card Program in 2005, which allows civilians to access PMRF using the main gate and affords unrestricted travel and access to Waiapua'a Bay and beach areas. In August 2012, beach access along PMRF's north and south boundaries was adjusted to allow walk-on beach use for civilians without authorized access to PMRF. Walk-on access to PMRF's shorelines is typically carried out from either the north or south. An Access Management Plan will be prepared to streamline access for subsistence, habitation, commercial activities, access issues, recreation, religious/spiritual activities, and customs. Contact the PMRF Public Affairs Office for more information: (808) 335-4740 or PMRFPublicAffairs@us.navy.mil.	Land Use and Access
0173	Shyanne Olores		2	Let me say this clearly. This is not America. This is the Hawaiian Kingdom and the lands beneath PMRF are stolen. There was no treaty, no sale, no legal transfer. The overthrow was illegal and Kanaka Maoli never ceded one inch.	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term "ceded." Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0173	Shyanne Olores		3	Over the last seven years, seven of my family members from Kekaha have died from cancer, all of them lifelong agricultural workers. I say this as I'm standing in my own mala picking ti leaves for my kids ho'ike tomorrow. So we have a long generation of everyone in our family working this 'āina. But like I was saying, over the last seven years, seven members of my 'ohana from Kekaha have died from cancer, all of them lifelong agricultural workers living in proximity to contaminated lands and waters polluted by decades of military negligence. PFAS in the soil, massive fuel tanks buried beneath the land, no cleanup, no transparency, just empty promises and requests for more time, more land, and more destruction. Enough. This is just environmental destruction. This is genocide, cultural genocide, environmental genocide, biological genocide.	The Navy and NASA respect your concern regarding cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Hazardous Materials and Waste (Section 3.12) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai'i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial	Public Health and Safety

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					investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Affected Environment) in the Final EIS. The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. Water quality monitoring programs are conducted at PMRF to test for the presence of PFAS and other contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Water Resources/Existing Conditions) in the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0173	Shyanne Olores		4	The draft EIS fails to account for RIMPAC -- for live-fire missile drills, for the desecration of sacred sites like Nohili or the global violence that they support. It refuses to acknowledge the truth because to do so would reveal the lie it all stands on, the U.S. -- that the U.S. has any right to be here, because it doesn't. Well, I'm here to speak for my ancestors whose voices still echo in these dunes, and they say no. We reject this lease. We reject any mitigation. We reject all options except the end of this occupation. Clean up your mess, restore what you destroyed, and give us back our land because this isn't a lease negotiation. This is stolen land. And the only pono path forward is for the United States military to end the lease and get the [expletive deleted] out. We're still here and we're never stopping. This is not America. This is Hawai'i . This is our home and we're taking it back. Pick up your [expletive deleted] and get out.	The Rim of the Pacific (RIMPAC) exercise, live-fire drills, missile tests, and global weapons transfers are outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. The Navy and NASA note your opposition to the Proposed Action. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	General Opposition
0174	Manuel Kuloloi'o		1	So, Ms. Anae, Ms. Ling, Captain Prince, I would ask if you can please include into your final DEIS and if you could send me a copy of that 2001 Final Report Archaeological Survey of Ka'ula Island, Hawai'i , prepared on behalf of the Pac Div NAVFAC Engineering Command by J. Robins and L. Anderson. I don't think I've seen it yet but he talks about how four archaeological sites were recorded on Ka'ula in which you say only four were interpreted to be traditional Hawaiian sites.	The Navy and NASA respect your concerns related to other military installations. However, impacts at Ka'ula Island are outside the jurisdiction and scope of this EIS, which is concerned with the lease, easement, fee simple acquisition, and use of State lands on Kaua'i Island. Effects to resources on Ka'ula Island from military training were analyzed in the 2025 PMRF Land-Based Training and Testing (LBTT) EA. A link to that document can be found in Table 1-5 of the Final EIS. More information can be found at this website: https://www.nepa.navy.mil/Current-Projects/Land-Based-Ranges/PMRF-Land-Based-Training-and-Testing-EA/Kaula-Island/. Please note the alternatives in this EIS would not impact the operations discussed in the 2025 PMRF LBTT EA. The Navy and NASA suggest contacting government officials to voice concerns regarding other military activities. You may request a copy of the archaeological survey report directly from PMRF Cultural Resources.	Archaeological and Architectural Resources
0174	Manuel Kuloloi'o		2	Ms. Anae, I say this in the spirit of -- I remember as part of ceremony for the return of Kaho'olawe island, we paddled canoes from Oneloa by Pu'u Ola'i on Maui across the channel to Molokini and we climbed atop Molokini. I climbed atop Molokini and made ceremony, blew the pu. And when you look at the backside of that Molokini, all you see is pockets of impacted craters. So when I had the honor of ka'apuni Ni'ihau and went off of Lehua, I was thinking about Molokini. When I went to Ka'ula rock, to Ka'ula, I thought about Molokini as well.	The Navy and NASA acknowledge and thank you for sharing your memories.	Cultural Practices

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				So that was my comment to you two nights ago at the veterans center, Ms. Anae. You heard a lot of the testimony and it's good to hear the people's voices.		
0174	Manuel Kuloloi'o		3	So you have training in Ka'ula Island. And even though you call this a real estate transaction then it would make a long gesture, Captain, if the United States Navy would return Ka'ula Island now, not later. Thank you, Ms. Ling.	Please see response to comment #1 regarding Kaʻula Island.	Ongoing Activities
0175	Kaimana Kinzie		1	Awesome. Kaimana Kinzie for the record. And, again, mahalo for everybody being here. This is the third and final night of these public hearings for the DEIS. And I think what we can all agree upon at this point is that each night there's been overwhelming opposition to moving forward with at least Alternatives 1 and 2. There's been proponents for Alternative 3. As I stated in the initial meeting two nights ago, I was in opposition of all three options. And what I stated back then was that, you know, my opposition is in response to the terminology that's used. We've heard these words many times over the last three nights: Occupation, illegal land acquisition, et cetera. I would really implore the military to not ignore these protests and to actually do their due diligence and ask the questions as to why people have these objections.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your opposition to all three alternatives is noted. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Action Alternatives
0175	Kaimana Kinzie		2	Is there a legal basis for it? And if there is, then it is incumbent on those involved to work through the system legally. And that's been, honestly, the issue since day one. And when I say "day one," I'm talking way back in the day, right, 1893. It's just the -- the blatant ignorance of the law. I know the military's very, very familiar with occupational law. So, again, I would urge the Navy, in particular, to really reexamine those things because we're still hearing the term "ceded land" being used. And yet, that term has been contested pretty vehemently over the course of the last three nights. There must be some reason for that. Either we're insane or somebody's missing something here in this narrative. So, again, my recommendation is to actually look into those things, not to ignore them as that's been the case over the last 132 years, but to face them and address them. So, again, mahalo. Thank you.	The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0176	Michael Daly		1	Hi. My name is Michael Daly. I'm a resident of Kaua'i for 33 years. Just following on from the last speaker that was online, (audio difficulty) gallery and making the comments about the consents that the kanakas and people have about the occupation. I'm a little bit reminded of when I look at the three alternatives that when the statehood vote was organized, there were only two questions on the ballot -- there were only two options on the ballot: Will Hawai‘i become a state, yes or no? And then there's a third option which would have been to reinstate the Hawaiian government. So when I say "the Hawaiian government," I mean the Hawaiian nation. (Audio difficulty) this is a beautiful island. It breaks my heart to see it being used for military purposes. There's a conflict, you can call it. Those three alternatives aren't enough, is it? I would suspend all those three and go for an option that includes an investigation and a path forward to resolve the occupation and the concerns of the kanaka, especially cultural consent -- and you see the problem is that there's only three alternatives. It's like a blind -- blinders on each side. You're not looking at the proper period. So I don't know what the time frame is. I know we have until August 7 but if there's anybody who can extend this document, I would do that.	The Navy and NASA thank you for your comments and appreciate your participation in the EIS process. Your opposition to the military presence in Hawai‘i is noted. Regarding the number of alternatives, as stated in Section 1.1 (Project Introduction and Overview) of the Final EIS, the EIS has been prepared consistent with Hawai‘i Administrative Rules (HAR) Chapter 11-200.1, the rules implementing Hawai‘i Revised Statutes Chapter 343. “The purpose of HAR Chapter 11-200.1 is to provide agencies and persons with procedures, specifications regarding the contents of ... environmental impact statements (EISs), and criteria and definitions of statewide application.” The Final EIS has been prepared to meet all content requirements identified in HAR Chapter 11-200.1. in accordance with the following: the National Environmental Policy Act (NEPA) (42 United States Code section 4321 et seq.); and NASA Procedural Requirement 8580.1A. The Final EIS includes analysis of two action alternatives that meet the purpose and need and a No Action Alternative (required by HEPA [Hawai‘i Revised Statutes Chapter 343] rules). A description of these alternatives is included in Section 2.3 (Alternatives Carried Forward for Detailed Analysis) of the Final EIS.	Action Alternatives
0177	Shyanne Olores		1	Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF)	The Navy and NASA thank you for your comment and appreciate your participation in the EIS process. The Navy and NASA note your opposition to the Proposed Action and appreciates the information you provided about your family lineage. The Navy and	General Opposition

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
				at Barking Sands, Kaua'i. I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our 'ohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military.	NASA respect your concerns regarding military operations and cultural practices. Discussion of Cultural Practices may be found in Section 3.3 (Cultural Practices) of the Final EIS. At this time, the land is under State jurisdiction by the Department of Land and Natural Resources (DLNR) and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	
0177	Shyanne Olores		2	Let me be absolutely clear: this is not America. These are stolen lands. Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied 'aina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives.	At this time, the land is under State jurisdiction by DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Section 3.5 (Land Use and Access) of the Final EIS. The Navy and NASA respect your concerns related to the term “ceded.” Footnotes have been included in the Final EIS to describe how the term is used in the EIS. Such use is not intended to refer to the actions of the Hawaiian Kingdom government.	Land Use and Access
0177	Shyanne Olores		3	Over the past 7 years, seven members of my 'ohana from Mana and Kekaha have died from cancer. All of them worked in agriculture. We know this land has been poisoned. PFAS contamination has been documented at PMRF since the 1960s, and still — over 60 years later — the Navy has failed to clean it up. The Draft EIS casually states that "remediation is forthcoming," while Kanaka continue to die. That is environmental negligence and cultural violence.	The Navy and NASA respect your concern regarding cancer-causing pollutants. The Navy takes the health and safety of all PMRF personnel and the surrounding community seriously, and is committed to being a good neighbor and community partner. Hazardous Materials and Waste (Section 3.12, Hazardous Materials and Waste) of the Final EIS has been revised to include updated information on per-and polyfluoroalkyl substances (PFAS) identified at the former firefighting training site. In compliance with the Comprehensive Environmental Response, Compensation, and Liability Act, a Preliminary Assessment to identify areas of interest where PFAS may have been stored, used, or released at PMRF was completed in December 2023. A concurrent Site Inspection to sample for the presence or absence of PFAS in soil and groundwater was completed in November 2023. In August 2025, the Navy responded to comments from the State of Hawai‘i Department of Health (DOH) and U.S. Fish and Wildlife Service through a Site Inspection Errata package and made necessary updates to the Preliminary Assessment recommendations. Five sites investigated in the Site Inspection where PFAS was detected above the U.S. Environmental Protection Agency screening levels, plus an area associated with a helicopter crash at PMRF in 2022, will be further evaluated in a remedial investigation. The remedial investigation is anticipated to begin in Fiscal Year 2026. The Navy will continue to work with the DOH during the remedial investigation process.	Public Health and Safety
0177	Shyanne Olores		4	The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we've seen at Red Hill - and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future.	The EIS discloses general fuel tank locations (exact location cannot be provided for security reasons) and provides an extensive discussion on drinking water monitoring conducted at PMRF. All fuel stored on leasehold and easement lands is presented in tabular format in Hazardous Materials and Waste (Section 3.12.1, Hazardous Materials and Wastes/Affected Environment). The tables contain fuel type, quantity, capacity, usage, and types of secondary containment devices utilized. Fuel storage tanks located on fee simple land are not analyzed in this EIS; however, aboveground storage tanks and underground storage tanks on fee simple land are disclosed in the 2010 PMRF Intercept Test Support EA/OEA in Section 3.1.1.1.6 of that document, which is publicly available, and can be found on the EIS website (www.pmrf-kpgo-eis.com). Water quality monitoring programs are conducted at PMRF to test for the presence of PFAS and other contaminants in the groundwater pumped from the Mānā Water Well. Please see Section 3.7.1.4.1.2 (Water Resources/Mānā Water Well) of the Water Resource section of the Final EIS for more information. Per the 2024 and 2025 Mānā Well Consumer Confidence Water Quality Reports, drinking water at PMRF is	Hazardous Materials and Waste

Letter ID	Commenter Name	Organization/ Affiliation	Comment Number	Original Public Comment on Draft EIS[1]	Response from Navy and NASA	Resource/Section
					safe to drink. These reports are publicly available on the EIS website at https://pmrf-kpgo-eis.com/documents.	
0177	Shyanne Olores		5	The Draft EIS fails to account for the full mauka to makai impacts of PMRF operations. It ignores the destruction caused by rocket launches, amphibious assaults, live-fire drills, and ongoing military exercises such as RIMPAC. It completely omits the environmental and cultural devastation these activities cause - not only on Kaua'i, but globally, as PMRF supports the testing and export of weapons used in international conflict and genocide. I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS. We reject mitigation. We reject any expansion. We reject continued occupation.	The Rim of the Pacific (RIMPAC) exercise, live-fire drills, missile tests, and global weapons transfers are outside the scope of this EIS. Also, please note that leasehold and easement lands are not necessary to conduct biennial RIMPAC exercises. As described in Chapters 1 and 2 of the Final EIS, this document addresses potential environmental impacts of the Proposed Action and alternatives, including the lease, easement, fee simple acquisition, and use of State lands. These actions have no potential to impact marine resources. The potential effects to marine resources from PMRF activities are analyzed in separate, previously completed environmental reviews of training and testing operations. Most recently, the 2025 Hawaii-California Training and Testing (HCTT) Final EIS/Overseas EIS (OEIS) analyzes environmental effects of at-sea military readiness activities on the marine biota. A brief summary of the 2025 HCTT Final EIS/OEIS is included in Table 1-5 of the Final EIS, and the full document is available on the EIS website at https://pmrf-kpgo-eis.com/documents. The Navy and NASA note your opposition to the Proposed Action. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5) of the Final EIS.	Ongoing Activities
0177	Shyanne Olores		6	We demand that the United States: 1. End the lease. 2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste. 3. Restore sacred sites, including the dunes at Nohili. 4. Return all lands under PMRF to the rightful stewards - the Kanaka Maoli. PMRF is not defense. It is desecration. And we will not stand by while our 'aina, our culture, and our families are poisoned in the name of war and profit. This is not America. This is Hawai'i. And the U.S. military must get out. Mahalo for receiving this testimony. I do not stand alone. Me ka 'oia'i'o, Shyanne Olores	1) Your opposition to the Proposed Action has been noted. 2) Please see response to comment #3 for more information on the ongoing PFAS investigation and upcoming remedial investigation. There are no tanks with active fuel leaks at PMRF. As discussed in Section 3.12 (Hazardous Materials and Waste) of the Final EIS, all hazardous waste produced on leasehold and easement lands is handled, managed, and disposed of in compliance with the Federal Facility Compliance Act, Resource Conservation and Recovery Act, and the Pollution Prevention Act. 3) Discussion of Cultural Practices, including the veneration of iwi kūpuna and ancestors, is discussed in Section 3.3.1.5 (Cultural Practices/Existing Conditions) of the Final EIS. At PMRF, coordination of access for cultural practices is guided by the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure #16 for approving and providing support for Native Hawaiian cultural practitioners who request cultural or public access to the installation. The program is intended to meet the needs of cultural practitioners while maintaining safety and military security. Public input on access for cultural practices is considered during updates of the ICRMP. In addition to the access program described above, all of PMRF's shoreline access areas are open with the exception of locations demarcated by restricted area signage. 4) The Navy and NASA thank you for your comment and appreciate your participation. At this time, the land is under State jurisdiction by the DLNR and DLNR holds the real estate agreements with the Navy and NASA. The EIS has been prepared consistent with the current federal and State legal framework. A history of land tenure and land use in the project area is described in Land Use and Access (Section 3.5, Land Use and Access) of the Final EIS.	Cultural Practices

Original Public Comments on Draft EIS

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DEIS Comment Letter 0001

Tami Carpenter <tamivfc@gmail.com> 6/21/2025 9:19 AM

Public Comment on Draft EIS – PMRF and KPGO Use of State Lands

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

To Whom It May Concern,

Please accept the following public comment regarding the Draft Environmental Impact Statement (EIS) concerning the continued use of state lands on Kaua‘i by the U.S. Navy and NASA. I respectfully request that my statement be entered into the public record.

> As a U.S. citizen and former resident of Hawai‘i, I am submitting this comment in response to the Draft Environmental Impact Statement (EIS) regarding the continued use of state lands on Kaua‘i by the U.S. Public Comment on Draft EIS – PMRF and KPGO Use of State Lands. Navy and NASA.
>
> The land and people of Hawai‘i are sacred and intertwined. Any evaluation of environmental impact must recognize that in Hawai‘i, cultural and ecological well-being are not separate concerns; they are inextricably linked. Continued federal use of these lands without the full, informed, and enthusiastic consent of Native Hawaiian communities risks violating both the spirit and the letter of environmental justice frameworks, including those outlined in Executive Order 12898 and the National Environmental Policy Act (NEPA).
>
> The EIS acknowledges potential effects on cultural practices and sacred sites, but fails to demonstrate how federal agencies will uphold the rights of Native Hawaiian people to protect and steward their ancestral land, particularly given the long history of land dispossession and cultural erasure following the illegal annexation of the Hawaiian Kingdom.
>
> I urge decision-makers to adopt the "No Action" alternative unless and until Native Hawaiian cultural practitioners, elders, and community leaders indicate their explicit support. To proceed without such consent would constitute a continuation of historical harm and would deeply undermine the stated goals of public engagement, cultural preservation, and environmental responsibility.
>
> As a military veteran, I served this country with the belief that integrity, freedom, and respect for sovereignty were core American values. That belief must extend to how we treat Indigenous communities and the lands they hold sacred. The people of Hawai‘i deserve more than symbolic consultation; they deserve to lead the conversation about their own future.

Thank you for the opportunity to provide input on this important matter.

Sincerely,
Tamara Carpenter
[Virginia Beach, VA]
Veteran, U.S. Navy (Ret.)

DEIS Comment Letter 0002

Roslyn Cummings <mana.eolakakouhawaii@gmail.com> 6/23/2025 7:27 PM

Fwd: Kaua‘i PMRF lease DEIS is out - public hearings next month

To jan.c.hirokawa@hawaii.gov • info@pmrf-kpgo-eis.com • gsfc-nepa@nasa.gov Copy
Nākai‘elua Villatora <nakai.eolakakouhawaii@gmail.com> • Tia Marie <tiamasaniai@gmail.com>

AFFIDAVIT OF OPPOSITION, PUBLIC ACCESS DEMAND & CONSTRUCTIVE TRUST DECLARATION

In the Matter of Environmental Projects Published in The Environmental Notice – June 23, 2025

Affiant: Roslyn Nicole Manawaiakea Mālama mare Cummings

In Propria Persona | Ho‘oilina | Native Tenant | Trustee of Malama:Cummings ‘Ohana God Trust©

On behalf of: E Ola Kākou Hawai‘i

Filed as: Court of Record | File on Demand

I. FOUNDATIONAL JURISDICTION: HAWAIIAN KINGDOM LAW & EQUITY STANDING

I affirm standing under the laws, customs, and constitutional framework of the Hawaiian Kingdom, including:

- 1839 Declaration of Rights of People and Chiefs
- 1840 & 1852 Hawaiian Kingdom Constitutions
- 1846 Civil Code of the Hawaiian Kingdom
- 1850 Kuleana Act

DEIS Comment Letter 0002

- Treaty of Friendship, Commerce, and Navigation (U.S.–Hawai‘i, 1849)

> “Government is a sacred trust for the benefit of the people… The lands belong to the people, not the government.”
> — 1840 Constitution, Kingdom of Hawai‘i

These instruments remain unrepealed and enforceable under international law, reaffirmed by:

- Larsen v. Hawaiian Kingdom, PCA Case No. 1999-01
- U.S. v. Lorenzo, 995 F.2d 1448 (9th Cir. 1993) (acknowledging legal arguments over the Hawaiian Kingdom’s continuity)

II. RECORD OF EXCLUSIVE EQUITY JURISDICTION

The following filings constitute lawful notice, perfected standing, and equitable jurisdiction for all claims made herein:

- Bureau of Conveyances:
  - Doc. No. A-9210000469 (Constructive Trust Declaration)
  - Doc. No. A-9210000470 (Jurisdictional Challenge)
- ⚖️ Hawai‘i Supreme Court: SCOT-25-0000197
- ⚖️ Fifth Circuit Court: 5CCV-25-0000033
- ⚖️ Land Court: 1CLD-24-0003640

These records operate as lawful rebuttals to any presumption of U.S. or State authority over Hawaiian lands or ancestry-based claims.

DEIS Comment Letter 0002

III. LEGAL FRAMEWORK & DUTIES

All agencies and license holders are bound by:

A. Rule of Law

"No one is above the law." — Marbury v. Madison, 5 U.S. 137 (1803)

B. Clearfield Doctrine

Clearfield Trust Co. v. United States, 318 U.S. 363 (1943): When governments act as corporations, they are subject to commercial liability and must prove jurisdiction.

C. Doctrine of Discovery – Rebutted

Johnson v. M'Intosh, 21 U.S. 543 (1823), is no longer applicable under:

- UNDRIP Articles 26–28
- Inter-American Commission Report 75/15 (2015)

DEIS Comment Letter 0002

- Permanent Court of Arbitration (Larsen v. Hawaiian Kingdom)

D. Trust and Fiduciary Law

All public lands are held in trust, requiring:

- Duty of loyalty and impartiality (Bogert's Trusts & Trustees, §543)
- Transparent disclosures to beneficiaries
- Consent of lineal heirs and native tenants for all development activity

IV. DEMAND FOR PUBLIC ACCESS

Under UIPA and HRS Chapter 92, we lawfully demand:

1. Complete access to:
    - All land title chains (LCAs, RPs, TMKs)
    - All archaeological reports, cultural assessments, burial records
2. Availability at all public hearings (print & digital)
3. Digital copies to be emailed to:
   manaeolakakouhawaii@gmail.com

Failure to comply constitutes denial of due process, fiduciary breach, and obstruction of remedy.

DEIS Comment Letter 0002

V. LIABILITY CLAUSE – NOTICE TO AGENT IS NOTICE TO PRINCIPAL

All named individuals and affiliated institutions are hereby served notice:

"Notice to agent is notice to principal. Notice to principal is notice to agent." — Maxim of Law

Let it be known:

Any government actor, agency, contractor, consultant, or license holder who proceeds without lawful consent, remedy, or recognition of ancestral standing and moʻokūʻauhau rights shall be held personally liable for:

- Trespass and unlawful conversion
- Fraud and concealment
- Cultural desecration
- Willful environmental harm

Under enforcement of:

Malama:Cummings ʻOhana God Trust©
Claim of Damages / Transgression Fee Schedule (on file)
Filed as Court of Record – Enforceable on Demand

VI. SERVED PARTIES & EMAIL ADDRESSES

DEIS Comment Letter 0002

University of the Nations, Kona

- Martina Segura – martina.t.segura@hawaii.gov
- David Hamilton – studentservices@uofnkona.edu
- Jeff Overton – uofnkona@g70.design
- Kiralee Ramos – kirar@g70.design

Maui Aloha ‘Āina Project

- Shayne Agawa – shayne.agawa@mauicounty.gov
- Keoni Gomes – gomes@aloha.net
- Kyle Ginoza – ginoza@gmail.com
- Comment inbox: environmental.mgmt@co.maui.hi.us

PMRF / Kōke‘e Park Project

- Ian Hirokawa – ian.c.hirokawa@hawaii.gov
- Kerry Ling – info@PMRF-KPGO-EIS.com
- Shari Miller – gsfc-nepa@nasa.gov
- Michele Lefebvre – michele.lefebvre@stantecgs.com

O‘ahu Subsea Cable Project

- Kariann Stark – kariann.stark@hawaii.gov
- Lauren Minford – lminford@subcom.com
- Tanya Copeland – tanya.copeland@icf.com

DEIS Comment Letter 0002

VII. CLOSING AFFIRMATION

Roslyn Nicole Manawaiakea Mālama mare Cummings known as Roslyn Cummings

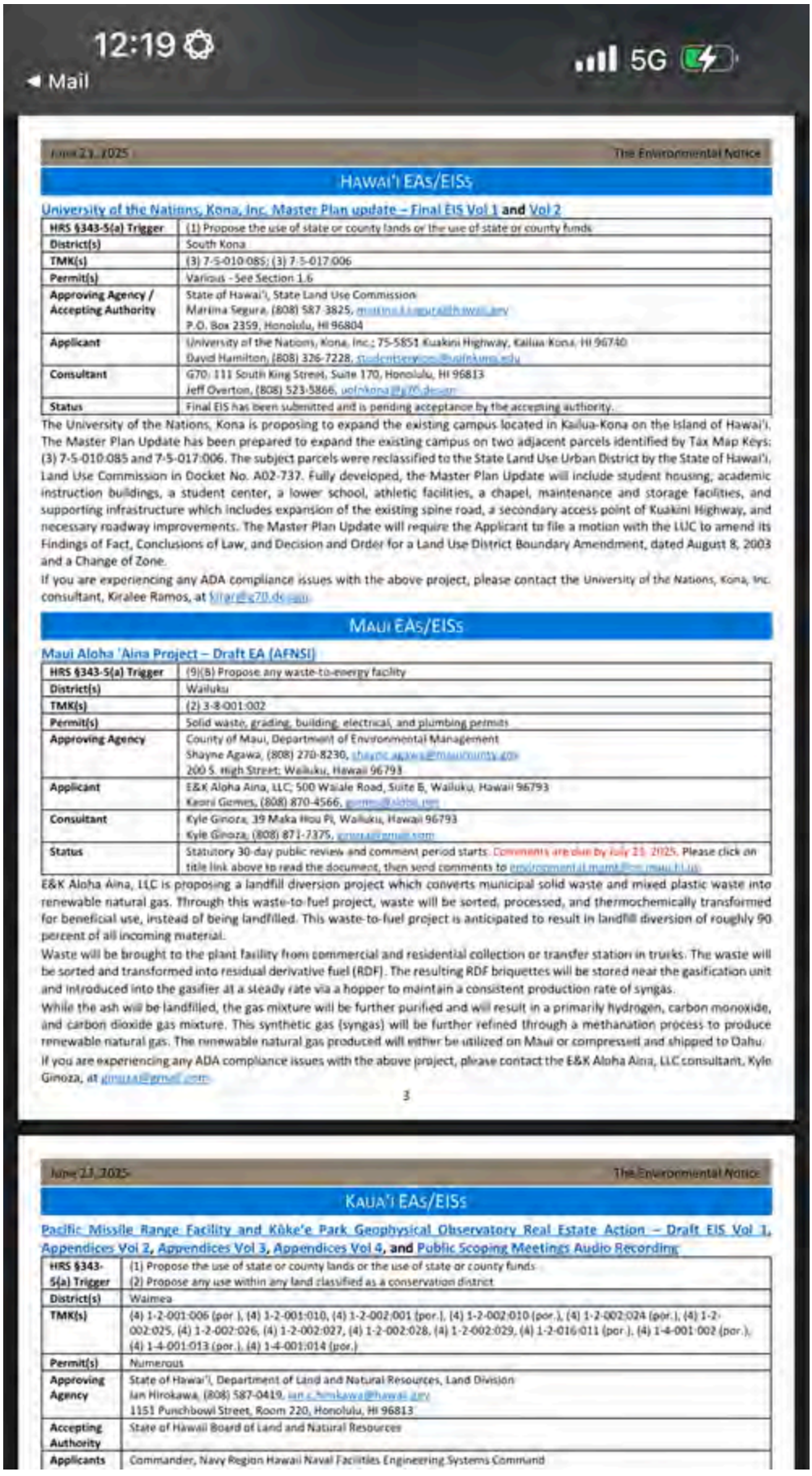
Roslyn Cummings

President, E Ola Kākou Hawai‘i

Trustee, Malama:Cummings ‘Ohana God Trust©

mana.eolakakouhawaii@gmail.com

DEIS Comment Letter 0002



June 23, 2025 The Environmental Notice

HAWAI'I EAs/EISs

University of the Nations, Kona, Inc. Master Plan update – Final EIS Vol 1 and Vol 2

HRS §343-5(a) Trigger	(1) Propose the use of state or county lands or the use of state or county funds
District(s)	South Kona
TMK(s)	(3) 7-5-010:085; (3) 7-5-017:006
Permit(s)	Various - See Section 1.6
Approving Agency / Accepting Authority	State of Hawai'i, State Land Use Commission Marilina Segura, (808) 587-3825, marilina.l.segura@hawaii.gov P.O. Box 2359, Honolulu, HI 96804
Applicant	University of the Nations, Kona, Inc.; 75-5851 Kuakini Highway, Kailua Kona, HI 96740 David Hamilton, (808) 326-7228, studentservices@uinkona.edu
Consultant	G70; 111 South King Street, Suite 170, Honolulu, HI 96813 Jeff Overton, (808) 523-5866, uofnkona@g70.design
Status	Final EIS has been submitted and is pending acceptance by the accepting authority.

The University of the Nations, Kona is proposing to expand the existing campus located in Kailua-Kona on the island of Hawai'i. The Master Plan Update has been prepared to expand the existing campus on two adjacent parcels identified by Tax Map Keys: (3) 7-5-010:085 and 7-5-017:006. The subject parcels were reclassified to the State Land Use Urban District by the State of Hawai'i, Land Use Commission in Docket No. A02-737. Fully developed, the Master Plan Update will include student housing, academic instruction buildings, a student center, a lower school, athletic facilities, a chapel, maintenance and storage facilities, and supporting infrastructure which includes expansion of the existing spine road, a secondary access point of Kuakini Highway, and necessary roadway improvements. The Master Plan Update will require the Applicant to file a motion with the LUC to amend its Findings of Fact, Conclusions of Law, and Decision and Order for a Land Use District Boundary Amendment, dated August 8, 2003 and a Change of Zone.

If you are experiencing any ADA compliance issues with the above project, please contact the University of the Nations, Kona, Inc. consultant, Kiralee Ramos, at kiralee@g70.design.

MAUI EAs/EISs

Maui Aloha 'Aina Project – Draft EA (AFNSI)

HRS §343-5(a) Trigger	(9)(B) Propose any waste-to-energy facility
District(s)	Wailuku
TMK(s)	(2) 3-8-001:002
Permit(s)	Solid waste, grading, building, electrical, and plumbing permits
Approving Agency	County of Maui, Department of Environmental Management Shayne Agawa, (808) 270-8230, shayne.agawa@mauicounty.gov 200 S. High Street; Wailuku, Hawaii 96793
Applicant	E&K Aloha Aina, LLC; 500 Waiale Road, Suite B, Wailuku, Hawaii 96793 Keoni Gomes, (808) 870-4566, gomes@alohaj.net
Consultant	Kyle Ginoza; 39 Maka Hou Pl, Wailuku, Hawaii 96793 Kyle Ginoza, (808) 871-7375, ginoza@gmail.com
Status	Statutory 30-day public review and comment period starts. Comments are due by July 23, 2025. Please click on title link above to read the document, then send comments to environmental.manb@co.maui.hi.us

E&K Aloha Aina, LLC is proposing a landfill diversion project which converts municipal solid waste and mixed plastic waste into renewable natural gas. Through this waste-to-fuel project, waste will be sorted, processed, and thermochemically transformed for beneficial use, instead of being landfilled. This waste-to-fuel project is anticipated to result in landfill diversion of roughly 90 percent of all incoming material.

Waste will be brought to the plant facility from commercial and residential collection or transfer station in trucks. The waste will be sorted and transformed into residual derivative fuel (RDF). The resulting RDF briquettes will be stored near the gasification unit and introduced into the gasifier at a steady rate via a hopper to maintain a consistent production rate of syngas.

While the ash will be landfilled, the gas mixture will be further purified and will result in a primarily hydrogen, carbon monoxide, and carbon dioxide gas mixture. This synthetic gas (syngas) will be further refined through a methanation process to produce renewable natural gas. The renewable natural gas produced will either be utilized on Maui or compressed and shipped to Oahu.

If you are experiencing any ADA compliance issues with the above project, please contact the E&K Aloha Aina, LLC consultant, Kyle Ginoza, at ginoza@gmail.com.

3

June 23, 2025 The Environmental Notice

KAUA'I EAs/EISs

Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Action – Draft EIS Vol 1, Appendices Vol 2, Appendices Vol 3, Appendices Vol 4, and Public Scoping Meetings Audio Recording

HRS §343-5(a) Trigger	(1) Propose the use of state or county lands or the use of state or county funds (2) Propose any use within any land classified as a conservation district
District(s)	Waimea
TMK(s)	(4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)
Permit(s)	Numerous
Approving Agency	State of Hawai'i, Department of Land and Natural Resources, Land Division Ian Hirokawa, (808) 587-0419, ian.c.hirokawa@hawaii.gov 1151 Punchbowl Street, Room 220, Honolulu, HI 96813
Accepting Authority	State of Hawaii Board of Land and Natural Resources
Applicants	Commander, Navy Region Hawaii Naval Facilities Engineering Systems Command

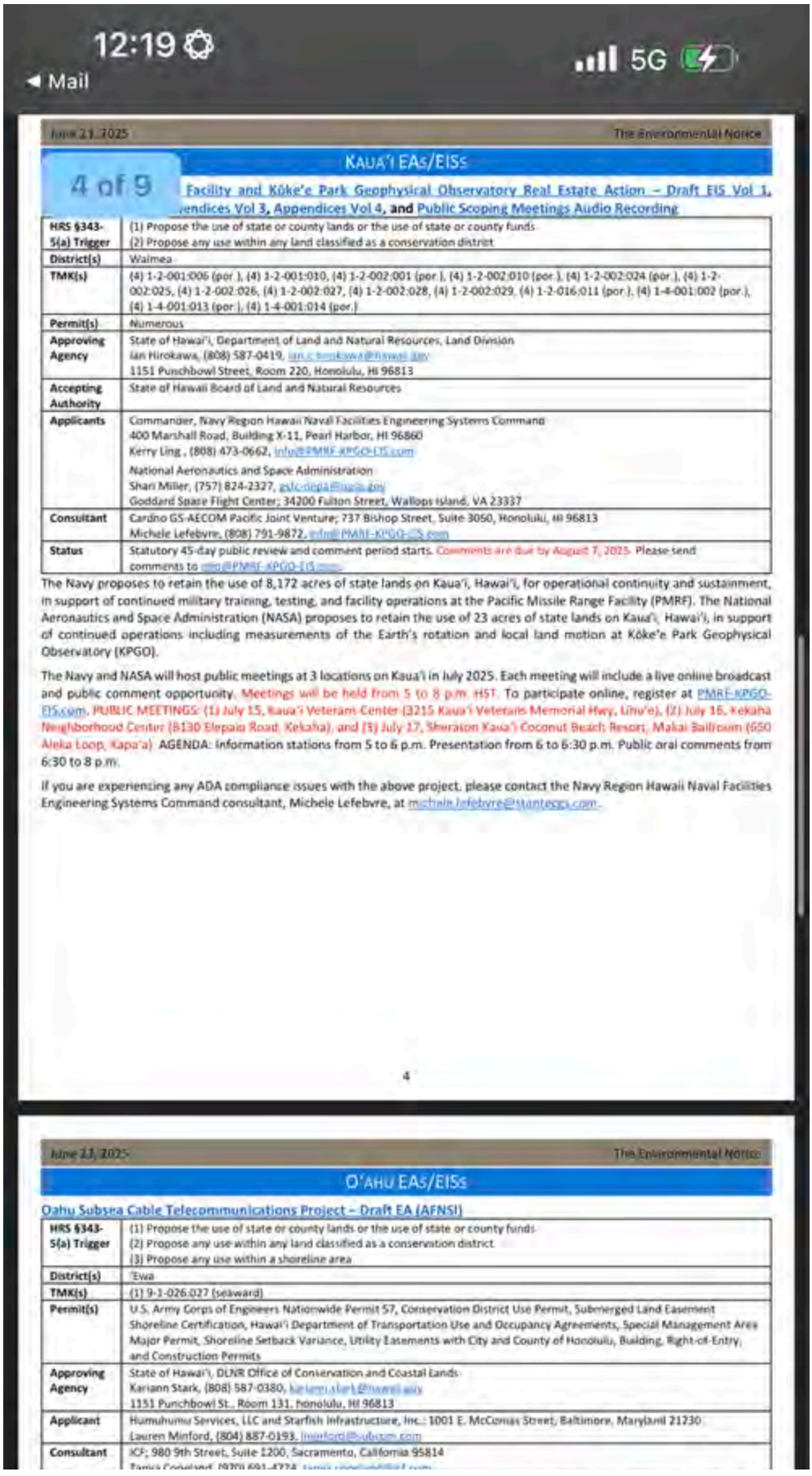
DEIS Comment Letter 0002

	400 Marshall Road, Building X-11, Pearl Harbor, HI 96860 Kerry Ling , (808) 473-0662, info@PMRF-KPGO-EIS.com National Aeronautics and Space Administration Shari Miller, (757) 824-2327, gsfc-nepa@mail.nasa.gov Goddard Space Flight Center; 34200 Fulton Street, Wallops Island, VA 23337
Consultant	Cardno GS-AECOM Pacific Joint Venture; 737 Bishop Street, Suite 3050, Honolulu, HI 96813 Michele Lefebvre, (808) 791-9872, info@PMRF-KPGO-EIS.com
Status	Statutory 45-day public review and comment period starts. Comments are due by August 7, 2023. Please send comments to info@PMRF-KPGO-EIS.com.

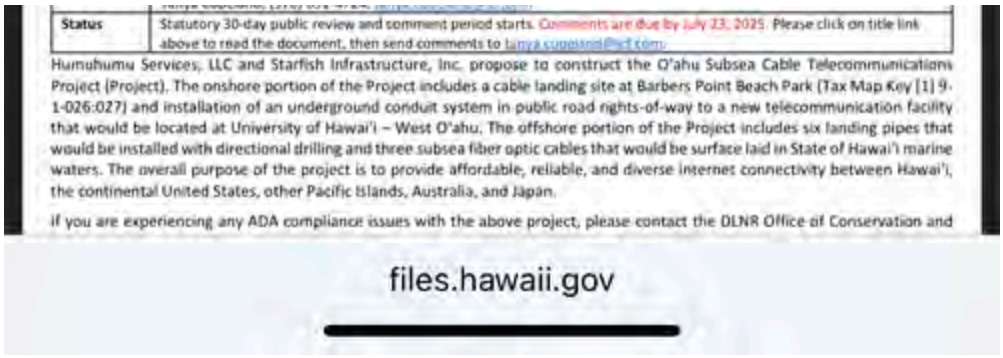
The Navy proposes to retain the use of 8,172 acres of state lands on Kaua'i, Hawai'i, for operational continuity and sustainment, in support of continued military training, testing, and facility operations at the Pacific Missile Range Facility (PMRF). The National

files.hawaii.gov

DEIS Comment Letter 0002



DEIS Comment Letter 0002



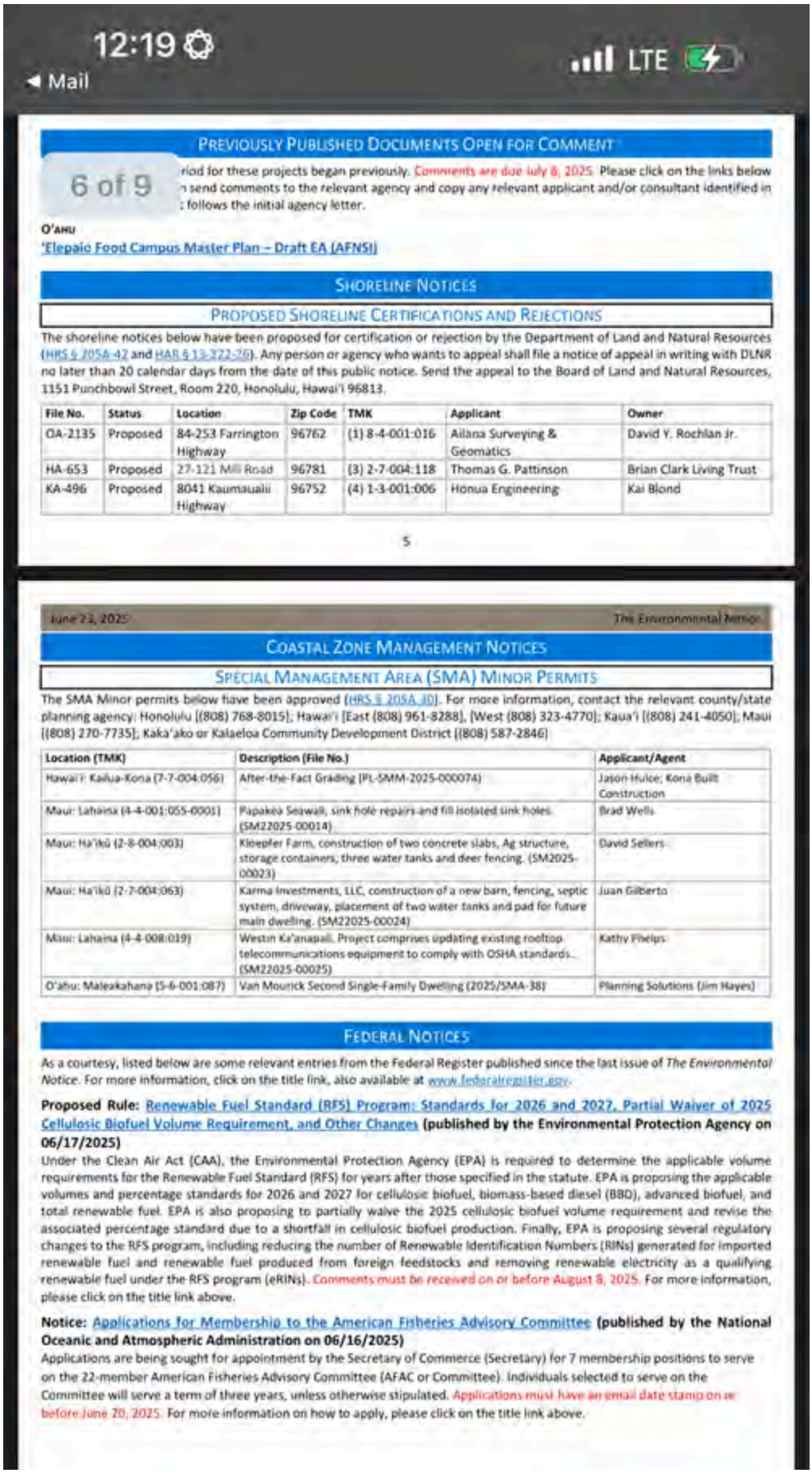
Status	Statutory 30-day public review and comment period starts. Comments are due by July 23, 2025. Please click on title link above to read the document, then send comments to tanya.cooper@hcf.com.

Humuhumu Services, LLC and Starfish Infrastructure, Inc. propose to construct the O'ahu Subsea Cable Telecommunications Project (Project). The onshore portion of the Project includes a cable landing site at Barbers Point Beach Park (Tax Map Key [1] 9-1-026:027) and installation of an underground conduit system in public road rights-of-way to a new telecommunication facility that would be located at University of Hawai'i – West O'ahu. The offshore portion of the Project includes six landing pipes that would be installed with directional drilling and three subsea fiber optic cables that would be surface laid in State of Hawai'i marine waters. The overall purpose of the project is to provide affordable, reliable, and diverse internet connectivity between Hawai'i, the continental United States, other Pacific Islands, Australia, and Japan.

If you are experiencing any ADA compliance issues with the above project, please contact the DLNR Office of Conservation and

files.hawaii.gov

DEIS Comment Letter 0002



Previously Published Documents Open for Comment

riod for these projects began previously. Comments are due July 8, 2025. Please click on the links below n send comments to the relevant agency and copy any relevant applicant and/or consultant identified in : follows the initial agency letter.

O'ahu

'Ele'ele Food Campus Master Plan – Draft EA (AFNSI)

Shoreline Notices

Proposed Shoreline Certifications and Rejections

The shoreline notices below have been proposed for certification or rejection by the Department of Land and Natural Resources (HRS § 205A-42 and HAR § 13-222-26). Any person or agency who wants to appeal shall file a notice of appeal in writing with DLNR no later than 20 calendar days from the date of this public notice. Send the appeal to the Board of Land and Natural Resources, 1151 Punchbowl Street, Room 220, Honolulu, Hawai'i 96813.

File No.	Status	Location	Zip Code	TMK	Applicant	Owner
OA-2135	Proposed	84-253 Farrington Highway	96762	(1) 8-4-001:016	Ailana Surveying & Geomatics	David Y. Rochlan Jr.
HA-653	Proposed	27-121 Mill Road	96781	(3) 2-7-004:118	Thomas G. Pattinson	Brian Clark Living Trust
KA-496	Proposed	8041 Kaumaualii Highway	96752	(4) 1-3-001:006	Honua Engineering	Kai Blond

5

June 23, 2025 The Environmental Notice

Coastal Zone Management Notices

Special Management Area (SMA) Minor Permits

The SMA Minor permits below have been approved (HRS § 205A-30). For more information, contact the relevant county/state planning agency: Honolulu [(808) 768-8015]; Hawai'i [East (808) 961-8288], [West (808) 323-4770]; Kaua'i [(808) 241-4050]; Maui [(808) 270-7735]; Kaka'ako or Kalaeloa Community Development District [(808) 587-2846]

Location (TMK)	Description (File No.)	Applicant/Agent
Hawai'i: Kailua-Kona (7-7-004:056)	After-the-Fact Grading (PL-SMM-2025-000074)	Jason Hulce; Kona Built Construction
Maui: Lahaina (4-4-001:055-0001)	Papakea Seawall, sink hole repairs and fill isolated sink holes. (SM22025-00014)	Brad Wells
Maui: Ha'ikū (2-8-004:003)	Kloepfer Farm, construction of two concrete slabs, Ag structure, storage containers, three water tanks and deer fencing. (SM2025-00023)	David Sellers
Maui: Ha'ikū (2-7-004:063)	Karma Investments, LLC, construction of a new barn, fencing, septic system, driveway, placement of two water tanks and pad for future main dwelling. (SM22025-00024)	Juan Gilberto
Maui: Lahaina (4-4-008:019)	Westin Ka'anapali. Project comprises updating existing rooftop telecommunications equipment to comply with OSHA standards. (SM22025-00025)	Kathy Phelps
O'ahu: Maleakahana (5-6-001:087)	Van Mourick Second Single-Family Dwelling (2025/SMA-38)	Planning Solutions (Jim Hayes)

Federal Notices

As a courtesy, listed below are some relevant entries from the Federal Register published since the last issue of *The Environmental Notice*. For more information, click on the title link, also available at www.federalregister.gov.

Proposed Rule: Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes **(published by the Environmental Protection Agency on 06/17/2025)**

Under the Clean Air Act (CAA), the Environmental Protection Agency (EPA) is required to determine the applicable volume requirements for the Renewable Fuel Standard (RFS) for years after those specified in the statute. EPA is proposing the applicable volumes and percentage standards for 2026 and 2027 for cellulosic biofuel, biomass-based diesel (BBD), advanced biofuel, and total renewable fuel. EPA is also proposing to partially waive the 2025 cellulosic biofuel volume requirement and revise the associated percentage standard due to a shortfall in cellulosic biofuel production. Finally, EPA is proposing several regulatory changes to the RFS program, including reducing the number of Renewable Identification Numbers (RINs) generated for imported renewable fuel and renewable fuel produced from foreign feedstocks and removing renewable electricity as a qualifying renewable fuel under the RFS program (eRINs). Comments must be received on or before August 8, 2025. For more information, please click on the title link above.

Notice: Applications for Membership to the American Fisheries Advisory Committee **(published by the National Oceanic and Atmospheric Administration on 06/16/2025)**

Applications are being sought for appointment by the Secretary of Commerce (Secretary) for 7 membership positions to serve on the 22-member American Fisheries Advisory Committee (AFAC or Committee). Individuals selected to serve on the Committee will serve a term of three years, unless otherwise stipulated. Applications must have an email date stamp on or before June 20, 2025. For more information on how to apply, please click on the title link above.

DEIS Comment Letter 0002

- image0.png (1 MB)
- image1.png (2 MB)
- image2.png (1 MB)

DEIS Comment Letter 0003

Submission #1110 (Record 10 of 13 Total Entries)	
Form Name	PMRF Contact Form
firstName	Valerie
question	PMRF: In what way will the large scale RIMPAC exercises involve PMRF? Can you please list ALL the activities the Navy will be conducting on the property and off-shore. How much sonar will be used offshore and in what areas. We need to know what is taking place if we are not to oppose it. How many ships are to be scuttled off Kauai? KPGO: How much ionizing radiation will NASA be generated from this location and at what hours for how long? Or will it be constant and continuous? What other dangers are possible with this facility operating at our park?
street-req	6616 Alahele St, Kapa‘a, HI, USA
zipcode	(none)
state	(none)
email	valerieweiss31@gmail.com
city	(none)
phoneNumber	8088227211
lastName	Weiss
addMeToTheProjectMailingList	Yes
consentForStoringSubmittedData	True
city-req	Kapaa

street	(none)
zipcode-req	96746
organizationAffiliationIfAny	(none)
state-req	HI
firstName2	(none)
lastName2	(none)

DEIS Comment Letter 0004

DOH.CABPASS <doh.cabpass@doh.hawaii.gov> 6/24/2025 5:44 PM

Draft Environmental Impact Statement of Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Hello Michele Lefebvre

Cardno GS-AECOM Pacific Joint Venture

Thank you for the opportunity to review Draft Environmental Impact Statement of Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate Vol 1, Appendices Vol 2., Appendices Vol 3., Appendices Vol 4., and the Public Scoping Meeting Audio Recording in the June 23, 2025 edition of the TENs. Please go to the Clean Air Branch (CAB) website to download and utilize our Standard Comments for Land Use Reviews. The link is included below.

https://health.hawaii.gov/cab/clean-air-branch/standard-comments-for-land-use-reviews/

Lisa Kitahara

Planning & Administrative Support Staff Supervisor | Clean Air Branch

Hawai'i State Department of Health | Ka ʻOihana Olakino

2827 Waimano Home Road #130 | Pearl City, Hawaii 96782

Office: (808) 586-4200

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DEIS Comment Letter 0004

Standard Comments for Land Use Reviews
Clean Air Branch
Hawaii State Department of Health
July 3, 2024

All project activities shall comply with Hawaii Administrative Rules (HAR), Chapter 11-59 and 11-60.1.

If your proposed project:

Requires an Air Pollution Control Permit

- You must obtain an air pollution control permit from the Clean Air Branch and comply with all applicable conditions and requirements. If you do not know if you need an air pollution control permit, please contact the Permitting Section of the Clean Air Branch.
- Permit application forms can be found here: https://health.hawaii.gov/cab/permit-application- forms/

Has the potential to generate fugitive dust

- You must reasonably control the generation of all airborne, visible fugitive dust. Note that construction activities that occur near existing residences, businesses, public areas and major thoroughfares exacerbate potential dust concerns. It is recommended that a dust control management plan be developed which identifies and mitigates all activities that may generate airborne, visible fugitive dust. The plan, which does *not* require Department of Health approval, should help you recognize and minimize potential airborne, visible fugitive dust problems.
- Construction activities must comply with the provisions of Hawaii Administrative Rules, §11- 60.1-33 on Fugitive Dust. In addition, for cases involving mixed land use, it is strongly recommended that buffer zones be established, wherever possible, in order to alleviate potential dust concerns.
- You must provide reasonable measures to control airborne, visible fugitive dust from the road areas and during the various phases of construction. These measures include, but are not limited to, the following:
  - Planning the different phases of construction, focusing on minimizing the amount of airborne, visible fugitive dust-generating materials and activities, centralizing on-site vehicular traffic routes, and locating potential dust-generating equipment in areas of the least impact;
  - Providing an adequate water source at the site prior to start-up of construction activities;
  - Landscaping and providing rapid covering of bare areas, including slopes, starting from the initial grading phase;
  - Minimizing airborne, visible fugitive dust from shoulders and access roads;
  - Providing reasonable dust control measures during weekends, after hours, and prior to daily start-up of construction activities; and
  - Controlling airborne, visible fugitive dust from debris being hauled away from the project site.
- If you have questions about fugitive dust, please contact the Enforcement Section of the Clean Air Branch. Please also see fugitive dust fact sheet at: https://health.hawaii.gov/cab/files/2024/02/Hawaii-Fugitive-Dust-Fact-Sheet-February-2024.pdf.

Includes construction, demolition, or renovation activities that involve potential asbestos and lead containing materials

- Please contact the Indoor and Radiological Health Branch at (808) 586-4700 or visit: https://health.hawaii.gov/irhb/

Increases the population and potential number of vehicles in an area

- The creation of apartment buildings, complexes, and residential communities may increase the overall population in an area. Increasing the population in an area may inadvertently lead to more air pollution via vehicle exhaust. Vehicle exhaust releases pollutants in the air that can negatively impact human health and air quality, including lung irritants, carcinogens, and greenhouse gases.
- Ensure that drivers keep vehicle idling times to three (3) minutes or less.
- Consider and incorporate support for alternative transportation options such as bike racks and/or electric vehicle charging stations where possible.

If you have any questions, please contact the Clean Air Branch at (808) 586-4200 or at cab@doh.hawaii.gov.

DEIS Comment Letter 0005

Michael Kaneshiro <michael.kaneshiro@doh.hawaii.gov> 6/24/2025 6:13 PM

CWB Comments on PMRF and NASA's Koke'e Park Geophysical Observatory Real Estate Draft EIS

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Aloha Ms. Kerry Ling,

Thank you for your email to the Clean Water Branch with the subject:

United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA)
Koke'e Park Geophysical Observatory Real Estate Draft Environmental Impact Statement, Kaua' i, Hawai' i;
Tax Map Keys:
(4) 1-2-00 I :006 (por.),
(4) 1-2-00 I :0 I 0,
(4) 1-2-002:00 I (por.),
(4) 1-2-002:0 IO (por.), (4) 1-2-002:024 (por.),
(4) 1-2-002:025,
(4) 1-2-002:026,
(4) 1-2-002:027,
(4) 1-2-002:028,
(4) 1-2-002:029,
(4) 1-2-0 16:01 1 (por.),
(4) 1-4-00 I :002 (por.),
(4) 1-4-00I :0 13 (por.),
(4) 1-4-00 I:014 (por.)

The CWB Standard Project Comments Memorandum-for-CWB-Standard-Project-Comments-07016CMHK.23-part-1-signed.pdf (hawaii.gov) are for agencies and project owners who are soliciting comments in fulfillment of their environmental review process. I have also enclosed CWB's memorandum for your convenience. As mentioned in the memorandum, CWB no longer responds to every solicitation for comments. Instead, CWB offers the enclosed standard project comments which you may use as part of your environmental review process. Please let me know if you have any questions.

Mahalo,
Mike Kaneshiro
Engineer | Environmental Management Division | Clean Water Branch
Hawaii State Department of Health | Ka ‘Oihana Olakino
2827 Waimano Home Road #225 | Pearl City, HI 96782
Office: (808) 586-4309
https://health.hawaii.gov/cwb/

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- Memorandum for CWB Standard Project Comments (07016CMHK.23) (part 1) - signed.pdf (373 KB)

DEIS Comment Letter 0005

JOSH GREEN, M.D.
GOVERNOR OF HAWAI'I
KE KIA'ĀINA O KA MOKUʻĀINA 'O HAWAI'I

KENNETH S. FINK, MD, MGA, MPH
DIRECTOR OF HEALTH
KA LUNA HO'OKELE

STATE OF HAWAI'I
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

07016CMHK.23

July 28, 2023

MEMORANDUM

SUBJECT: Clean Water Branch Standard Project Comments

TO: Agencies and Project Owners

FROM: DARRYL LUM, P.E., CHIEF
Clean Water Branch

This memo is provided for your information and sharing. You are encouraged to share this memo with your project partners, team members, and appropriate personnel.

The Department of Health (DOH), Clean Water Branch (CWB) will no longer be responding directly to requests for comments on the following documents (Pre-consultation, Early Consultation, Preparation Notice, Draft, Final, Addendums, and/or Supplements):

- Environmental Impact Statements (EIS)
- Environmental Assessments (EA)
- Stream Channel Alteration Permits (SCAP)
- Stream Diversion Works Permits (SDWP)
- Well Construction/Pump Installation Permits
- Conservation District Use Applications (CDUA)
- Special Management Area Permits (SMAP)
- Shoreline Setback Areas (SSA)

For agencies or project owners requiring DOH-CWB comments for one or more of these documents, please utilize the DOH-CWB Standard Comments below regarding your project's responsibilities to maintain water quality and any necessary permitting. DOH-CWB Standard Comments are also available on the DOH-CWB website located at: http://health.hawaii.gov/cwb/.

DOH-CWB Standard Comments

The following information is for agencies and/or project owners who are seeking comments regarding environmental compliance for their projects with the Hawaii Administrative Rules (HAR), Chapters 11-53, 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program.

1. Any project and its potential impacts to State waters must meet the following criteria:

   a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.

   b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.

   c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

2. You may be required to obtain National Pollutant Discharge Elimination System (NPDES) permit coverage for point source water pollutant discharges into State surface waters (HAR, Chapter 11-55). Point source means any discernible, confined, and discrete conveyance from which pollutants are or may be discharged.

   For NPDES general permit coverage, a Notice of Intent (NOI) form must be submitted at least 30 calendar days before the commencement of the discharge. An application for a NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. To request NPDES permit coverage, you must submit the applicable form ("CWB Individual NPDES Form" or "CWB NOI Form") through the e-Permitting Portal and the hard copy certification statement with the respective filing fee ($1,000 for an individual NPDES permit or $500 for a Notice of General Permit Coverage). Please open the e-Permitting Portal website located at: https://eha-cloud.doh.hawaii.gov/epermit/. You will be asked to do a one-time registration to obtain your login and password. After you register, click on the Application Finder tool and locate the appropriate form. Follow the instructions to complete and submit the form.

   The DOH, Environmental Health Administration (EHA) e-Permitting Portal received Cross-Media Electronic Reporting Rule (CROMERR) certification by the Environmental Protection Agency (EPA) for electronic signature. Currently, Applicants and Permittees may now certify and submit EHA Electronic Signature Forms electronically through the EHA e-Permitting Portal without the need to physically send in an ink signature and CD/DVD/flash drive.

Beginning January 31, 2023, the DOH-CWB will only utilize electronic signature e-Permitting forms and discontinue the hard-copy signature forms. All hard-copy signature certification e-Permitting forms, including compliance forms, will be inactivated.

The electronic signature forms will require electronic signature approval to submit a form to the CWB. For details on how to obtain the electronic signature approval please visit CWB website located at: https://health.hawaii.gov/cwb/announcements/cwb-announces-new-requirement-for-electronic-signature-approval-for-all-submissions-beginning-january-31-2023/.

The NPDES NOI or application will be processed after the filing fees submitted and payable to the "State of Hawaii" in the form of a pre-printed check, cashier's check, money order, or as otherwise specified by the director is received by the CWB.

Some of the activities requiring NPDES permit coverage include, but, are not limited to:

a. Discharges of Storm Water.

   i. For Construction Activities Disturbing One (1) or More Acres of Total Land Area.

      By HAR Chapter 11-55, an NPDES permit is required before the start of the construction activities that result in the disturbance of one (1) or more acres of total land area, including clearing, grading, and excavation. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale.

   ii. For Industrial Activities for facilities with primary Standard Industrial Classification (SIC) Codes regulated in the Code of Federal Regulations (CFR) at 40 CFR 122.26(b)(14)(i) through (ix) and (xi). If a facility has more than one SIC code, the activity that generates the greatest revenue is the primary SIC code. If revenue information is unavailable, use the SIC code for the activity with the most employees. If employee information is also unavailable, use the SIC code for the activity with the greatest production.

   iii. From a small Municipal Separate Storm Sewer System (along with certain non-storm water discharges).

b. Discharges to State surface waters from construction activity hydrotesting or dewatering.

c. Discharges to State surface waters from cooling water applications.

d. Discharges to State surface waters from the application of pesticides (including insecticides, herbicides, fungicides, rodenticides, and various other substances to control pest) to State waters.

e. Well-Drilling Activities.

Any discharge to State surface waters of treated process wastewater effluent associated with well drilling activities is regulated by HAR Chapter 11-55. Discharges of treated process wastewater effluent (including well drilling slurries, lubricating fluids wastewater, and well purge wastewater) to State surface waters requires NPDES permit coverage.

NPDES permit coverage is not required for well pump testing. For well pump testing, the discharger shall take all measures necessary to prevent the discharge of pollutants from entering State waters. Such measures shall include, if necessary, containment of initial discharge until the discharge is essentially free of pollutants. If the discharge is entering a stream or river bed, best management practices (BMPs) shall be implemented to prevent the discharge from disturbing the clarity of the receiving water. If the discharge is entering a storm drain, the discharger must obtain written permission from the owner of the storm drain prior to discharge. Furthermore, BMPs shall be implemented to prevent the discharge from collecting sediments and other pollutants prior to entering the storm drain.

3. A Section 401 Water Quality Certification (WQC) may be required if your project/activity:

a. Requires a federal license or permit; and

b. May result in a discharge into waters of the United States (WOTUS).

"License or permit" means any permit, certificate, approval, registration, charter, membership, statutory exemption, or other form of permission granted by an agency of the federal government to conduct any activity which may result in any discharge.

The term “discharge” is defined in Clean Water Act, Subsections 502(16), 502(12), and 502(6).

Examples of “discharge” include, but are not limited to, allowing the following pollutants to enter WOTUS from the surface, or in-water: solid waste, rock/sand/dirt, heat, sewage, construction debris, any underwater work, chemicals, fugitive dust/spray paint, agricultural wastes, biological materials, industrial wastes, concrete/sealant/epoxy, and washing/cleaning effluent.

Determine if your project/activity requires a federal permit, license, certificate, approval, registration, or statutory exemption by contacting the appropriate federal agencies (e.g. Department of the Army (DA), U.S. Army Corps of Engineers (COE), Pacific Ocean Division Honolulu District Office (POH) Tel: (808) 835-4303; U.S. Environmental Protection Agency, Region 9 Tel: (415) 947-8021; Federal Energy Regulatory Commission Tel: (866) 208-3372; U.S. Coast Guard Office of Bridge Programs Tel: (202) 372-1511). If your project involves work in, over, or under waters of the United States, it is highly recommended that you contact the COE-POH regarding their DA permitting requirements.

To request an individual Section 401 WQC, you must complete and submit the Section 401 WQC application together with $1,000 filing fee made payable to the "State of Hawaii" in the form of a check or other method specified by the department. This application is available on the e-Permitting Portal website located at: https://eha-cloud.doh.hawaii.gov/epermit/.

The processing of a Section 401 WQC application will begin after the CWB has received filing fee. The processing of a Section 401 WQC application is also subject to the compliance with 40 CFR §121 requirements.

Beginning January 31, 2023, the DOH-CWB will only utilize electronic signature e-Permitting forms and discontinue the hard-copy signature forms. All hard-copy signature certification e-Permitting forms, including compliance forms, will be inactivated.

The electronic signature forms will require electronic signature approval to submit a form to the CWB. For details on how to obtain the electronic signature approval please visit CWB website located at: https://health.hawaii.gov/cwb/announcements/cwb-announces-new-requirement-for-electronic-signature-approval-for-all-submissions-beginning-january-31-2023/.

Please see HAR, Chapters 11-53 and 11-54 for the State's Water Quality Standards and for more information on the Section 401 WQC. HAR, Chapters 11-53 and 11-54 are available on the CWB website at: http://health.hawaii.gov/cwb/.

4. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage and/or Section 401 WQC are required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapters 11-53 and 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of $25,000 per day per violation and up to two (2) years in jail.

5. It is the State's position that all projects must reduce, reuse, and recycle to protect, restore, and sustain water quality and beneficial uses of State waters. Project planning should:

   a. Treat storm water as a resource to be protected by integrating it into project planning and permitting. Storm water has long been recognized as a source of irrigation that will not deplete potable water resources. What is often overlooked is that storm water recharges ground water supplies and feeds streams and estuaries; to ensure that these water cycles are not disrupted, storm water cannot be relegated as a waste product of impervious surfaces. Any project planning must recognize storm water as an asset that sustains and protects natural ecosystems and traditional beneficial uses of State waters, like community beautification, beach going, swimming, and fishing. The approaches necessary to do so, including low impact development methods or ecological bio-engineering of drainage ways must be identified in the planning stages to allow designers opportunity to include those approaches up front, prior to seeking zoning, construction, or building permits.

   b. Clearly articulate the State's position on water quality and the beneficial uses of State waters. The plan should include statements regarding the implementation of methods to conserve natural resources (e.g. minimizing potable water for irrigation, gray water re-use options, energy conservation through smart design) and improve water quality.

   c. Consider storm water Best Management Practice (BMP) approaches that minimize the use of potable water for irrigation through storm water storage and reuse, percolate storm water to recharge groundwater to revitalize natural hydrology, and treat storm water which is to be discharged.

d. Consider the use of green building practices, such as pervious pavement and landscaping with native vegetation, to improve water quality by reducing excessive runoff and the need for excessive fertilization, respectively.

e. Identify opportunities for retrofitting or bio-engineering existing storm water infrastructure to restore ecological function while maintaining, or even enhancing, hydraulic capacity. Consideration should be given to areas prone to flooding, or where the infrastructure is aged and will need to be rehabilitated.

DEIS Comment Letter 0006

Entries for "PMRF Draft EIS Comment Form"

PMRF-1112 (Record 56 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Russell	**Last Name** Tsuji	**Mailing List** Yes	
Street 99-178 Kealakaha Drive	**City** Aiea	**State** HI	**Zip** (none)
Email 1397rtsuji@gmail.com		**Organization** self	
Attachments (none)			
Comments I'd like to see the disclosure and studies related to the marine impacts related to the training activities occurring at Barking Sands on fast lands and in the ocean. I understand that missiles are fired from below the surface (from submarines) and at surface (from boats/ships) of the ocean aimed at targets shot from the land at Barking Sands. I suspect there are impacts to marine life (T&E species) that ought to be disclosed and fully studied before the Land Board makes its final decision on whether to issue a new lease to the Navy. Thank you for allowing me to comment. Russell Y. Tsuji			

DEIS Comment Letter 0007

Michael Jones <mdj04012015@gmail.com> 6/26/2025 8:49 PM

request for print copy of the PMRF and KPGO RE DEIS

To pmrfpublicaffairs@us.navy.mil • info@pmrf-kpgo-eis.com

I have commented upon previous EIS documents for activities at PMRF including the Navy's Pacific Missile Range Facility Enhanced Capability draft and final EIS in 1998 and am hereby requesting a printed copy of volume 1 of the 2025 PMRF and KPGO RE DEIS.

Michael Jones
1434 Punahou St, Apt 608
Honolulu, HI 96822

DEIS Comment Letter 0008

Larry Graff <lgraff@pal-hawaii.org> 6/30/2025 4:29 PM

KKCR Radio request for appearance

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Aloha,

My name is Larry Graff. I am the Executive Director of PAL Hawaii and co-host of a monthly radio talk show on KKCR. I would like to ask if someone from PMRF, preferably Capt. Brett Stevenson, would like to appear on our radio show to talk about PMRF and the lease renewal and the EIS. The show airs on July 28th from 4 to 6 PM and guests can call in rather than appearing in studio.

I can be reached by email or directly at 808-738-6706. Please let me know if there is an interest or not. Our show runs during radio prime time for listeners at the end of the day returning from work and we are informed we have a considerably sized audience. Our show is meant to inform the people of Kauai regarding issues of the day and we try to present information in a fair and impartial manner. We believe the lease renewal and relationship with PMRF on Kauai is a vital issue that our listeners would like to hear about – call-in and ask questions.

On a side note, I am also a Halau member who has participated in ceremony at PMRF with our Kumu and PAL Board Member Puna Dawson. I think having someone from PMRF on our show will be a positive experience.

Mahalo,

Larry

Larry Graff
Executive Director
larry@pal-hawaii.org
+1 (808) 720-1011 ext. 404
www.pal-hawaii.org

PAL HAWAI'I
Permanently Affordable Living

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- image001.png (316 KB)

DEIS Comment Letter 0009

Emma Schneck <emmasch.kauai@gmail.com> 6/30/2025 7:41 PM

Kaua'i Now News - PMRF Comments on State Land Agreements

To info@pmrf-kpgo-eis.com • pmrfpublicaffairs@us.navy.mil

Aloha PMRF team,

I hope you are well. My name is Emma and I am a reporter for Kaua'i Now News. We are currently working on an article about the U.S Navy's state land agreement and related environmental impact statements and would love to get comments from someone on your team for the piece.

Is there a time this week that I would be able to arrange a brief meeting with someone from your staff? Please let me know.

All the best,

Emma Schneck
emmasch.kauai@gmail.com
(808) 635-0328

DEIS Comment Letter 0010

Michael Jones <mdj04012015@gmail.com> 6/30/2025 9:02 PM

Re: request for print copy of the PMRF and KPGO RE DEIS

To info <info@pmrf-kpgo-eis.com> Copy pmrfpublicaffairs@us.navy.mil

Thanks for the reply. I am living in a retirement community and it is difficult to go out. I also have difficulty reading large amounts of text on a computer monitor. This is why I requested a print copy of the draft EIS. Volume 1 would be sufficient.

Michael D Jones

On Mon, Jun 30, 2025 at 11:56 AM info <info@pmrf-kpgo-eis.com> wrote:

> Hello Mr. Jones,
>
> Thank you for contacting us. There are printed copies of the full Draft EIS available for public review at the Hawaii Documents Center (Hawaii State Library in Honolulu) and the Waimea Public Library on Kauai. If any further accommodations are needed, please let our team know.
>
> Sincerely,
> PMRF and KPGO Real Estate EIS Team
>
> > On 06/26/2025 8:49 PM EDT Michael Jones <mdj04012015@gmail.com> wrote:
> >
> > I have commented upon previous EIS documents for activities at PMRF including the Navy's Pacific Missile Range Facility Enhanced Capability draft and final EIS in 1998 and am hereby requesting a printed copy of volume 1 of the 2025 PMRF and KPGO RE DEIS.
> >
> > Michael Jones
> > 1434 Punahou St, Apt 608
> > Honolulu, HI 96822

DEIS Comment Letter 0011

Valerie Weiss <valerieweiss31@gmail.com> 7/2/2025 5:28 PM

REJECT DRAFT EIS

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

After reading what is listed in the EIS I am not satisfied with it being thorough, regarding actual activities at sea and on land. I requested further info more than10 days ago and have received zero responses.

As the USN knows Hawaii has been adversely affected on our islands in many ways by their activities and lack of clean up and care. I am concerned about UXOs, which remain dangerous on our islands at various locations. Hazardous materials, lead contamination and other waste were not addressed in what was available to the reader.

There was not a word about the nearby ocean activities or use of sonar, but there was a minimal mention of RIMPAC which brings horrendous marine environmental damage in itself, every 2 years with the huge number of invited countries participating, the ongoing sinking of (cleaned) ships for target practice, etc.. There was no mention in this EIS draft of how many retired Naval ships will be scuttled for practice, adding more foreign junk to our oceans. (No they are not reefs, they are junk and do not add to the fish population. They only attract fish already nearby, studies have shown.)

For the NASA GEOPHYSICAL OBSERVATORY in Kokee State Park, there was no mention of the amount of ionizing radiation it will produce or for what periods. The mapping and data collection would be better done away from the park location where people flock for its natural setting, hiking, etc. Certainly not to receive ionizing radiation.

Valerie Weiss

Wailua Homesteads
Kauai

DEIS Comment Letter 0012

Shaun Wolfe <shaun@shaunwolfephoto.com> 7/11/2025 11:25 AM

Draft EIS from NASA and the US Navy Concerning PMRF and KPGO

To info@pmrf-kpgo-eis.com

Aloha,

I would like to submit written testimony regarding the draft EIS:

I strongly urge the rejections of the draft EIS from Nasa and the US Navy in an attempt to retain the PMRF and KPGO lands on Kaua'i. These areas include conservation zones and wahi pana. These lands were taken from Hawaiians without consent and desecrated as part of a long colonial history in Hawai'i. The DEIS says there is an adverse impact to cultural access but deems this impact insignificant, which after living in a largely Kānaka Maoli community for the last 3 years, I can tell you that is *absolutely* not the consensus amongst Hawaiians. The lack of access violates indigenous rights to practice culture and access sacred sites.

The DEIS also minimizes military activity which causes soil erosion, increased wildfire risk, and habitat destruction. The DEIS also claims that there would be a significant adverse impact on the biological resources of these lands if the no action alternative goes into place. I think that that is completely dependent on who these lands are stewarded by. If the lands go to the people of Hawai'i, we will see incredible stewardship and an ecosystem in much better health, as we've seen time and time again (He'eia is a great example).

Furthermore, the DEIS ignores both marine and freshwater impacts including noise pollution impacts on marine mammals and the US military's long history in Hawai'i of poisoning freshwater sources.

I urge you to reject this DEIS and let the leases expire so these lands can be restored to the highest level of ecological health and colonial wounds of the past and present can begin to heal. Kaua'i is not a war testing ground. It is the homeland of Hawai'i's indigenous people and has been for over two millennia. Let the leases expire and watch aloha 'āina stewardship happen.

Sincerely,

--
Shaun Wolfe (he/him)
shaunwolfephoto.com
818.439.8472

DEIS Comment Letter 0013

PMRF-1128 (Record 55 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name FRANK O.	**Last Name** HAY	**Mailing List** Yes	
Street 268 HUA PLACE	**City** KAPAA, KAUAI	**State** HI	**Zip** (none)
Email kokee@okauai.com		**Organization**	
Attachments Yes • File Attachment: 2025.07_july_12_pmrf:_nasa_env_comments_.pdf *			
Comments Testimony in Strong Support of Continued Leases at PMRF and the Koke'e Geophysical Observatory			

* Attachment could not be opened. Commenter was contacted via email and requested to resubmit. No response was received.

DEIS Comment Letter 0014

PMRF-1130 (Record 54 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Richard	**Last Name** Gioscia	**Mailing List** Yes	
Street 8589 Kaumulai'i Hwy	**City** Kekaha	**State** HI	**Zip** (none)
Email richardmgioscia@gmail.com		**Organization**	
Attachments (none)			
Comments See attached file regarding negative impact of base traffic on the Kekaha community.			

DEIS Comment Letter 0015

PMRF-1132 (Record 53 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Maria	**Last Name** Walker	**Mailing List** Yes	
Street PO Box 33	**City** Kapaa	**State** HI	**Zip** (none)
Email maria.makaleha@gmail.com		**Organization**	
Attachments (none)			

Comments

Aloha, I am writing to you to express my support for Option 3, that no new leases are granted for the land in question at Mana and Koke'e. I am especially opposed to Option 2, which appears to be an opportunity for the Navy and NASA to purchase the lands they are currently using instead of leasing them. I believe that the US Military's use of Kaua'i's natural resources has an enormously negative effect on our natural environment and our community. The supposed positive impact on our economy, and the jobs that result from this military presence, in no way compensates for the destruction of our aina and surrounding waters, the desecration of historical, cultural and burial sites, and the exclusion of all residents and visitors from using the beaches and near shore waters in Mana. It should be painfully obvious at this point that the US military cannot be trusted to responsibly care for any site it is given to manage, and that their land and water usage in Hawai'i has consistently proven to be detrimental to the health of our land, our fresh and salt waters, our air and our residents' personal health and well being. No matter what agreements or promises are made, all branches of the US military have shown that they do not respect the land or the trust that they have been granted by the state; they fail to uphold their responsibilities, and any effort to make the military clean up or mitigate impacts is met with evasion, obfuscation, and flat out refusal. Red Hill, Kaho'olawe, and Pohakuloa are just a few recent examples of the ruinous and heedless practices of the military and their subsequent refusal to take any responsibility for their actions and the toxic waste, poisoned water and ordinance that result from their actions. These leases all over the state are usually rented for absurdly small sums with little taxes paid, and with no formal recourse for the counties to try to regulate the military's behavior or enforce compliance with environmental regulations or cultural protocols. I do not believe there are any positive impacts from this military presence on Kaua'i that could possibly be considered a reasonable trade off for the damage our island and people suffer from the leasing of these lands. In addition, PMRF's presence means that every other year our island and our oceans suffer the disaster that is

RIMPAC, and makes Kaua'i a year round target for any country wishing to bomb a military installation belonging to the US. Mahalo for hearing my comments. Maria Walker

DEIS Comment Letter 0016

PMRF-1133 (Record 52 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Lana	**Last Name** Bilbo	**Mailing List** Yes	
Street 5876 Ahakea Street	**City** Kapaa	**State** HI	**Zip** (none)
Email lana.starr@gmail.com		**Organization** Kauai for Palestine, Jewish Voice for Peace Hawaii	
Attachments (none)			

Comments

The NAVY has not done an EIS study for PMRF since 1998. They are not meeting their legal and moral obligations to understand their impact. Last year, the NAVY proposed to TRIPLE activities at PMRF without doing an EIS, and instead argued that tripling the activities at PMRF would have no significant impacts on the environment and people. That's a lie. The NAVY is once again neglecting their obligations and using technicalities to avoid accountability. Hewa. Now, the NAVY is doing an EIS that ignores most of their impact on land and at sea. This EIS will not cover the "fee simple" land on the base that the NAVY "owns." From a 2010 document we know that the base had tens of thousands of gallons in fuel storage tanks, but this EIS does not give us information or recent test results to prove that these hazardous materials are stored safely. After the disaster of Red Hill, the burden is on the NAVY to show they are taking care of the: 9x 50,000-gallon underground storage tanks (USTs) located at the Fuel Farm 1x 30,000-gallon UST located at the Power Plant 2x 5,000-gallon USTs at the Navy Exchange 3x 5,000-gallon USTs at the gasoline station, and one 1,000-gallon UST at the Calibration Lab 2x 6,000-gallon diesel aboveground storage tanks (ASTs) 1x 1,000 gallon AST at Makaha Ridge 3x 200-gallon ASTs near building 510 and one 1,000-gallon AST near building 450 1x UST and x1 10,000-gallon AST at KTF The NAVY has lied, misled and deceived the public about the status of fuel storage at Red Hill. Now, they hide information from the public through procedure and technicalities to avoid accountability for these tanks on Kauai. Hewa. Endangered, native, and endemic species can be found on the lease and fee simple lands and waters nearby. This includes honu and monk seals, a large variety of native birds, native flies, native plants, and more. There are many significant impacts. A few are: rocket launches that make sound disturbances and can ignite vegetation disturb the land habitat; amphibious assaults disturb the beach habitat; and the missiles launched and vessels swarming the oceans disturb the ocean habitats of these critical species. Hewa. They hide the impact of their operations in another way. Where do the missiles launched from PMRF go? Where do the aircraft launched there drop their bombs? What does the high tech monitoring equipment at

PMRF and in Kokee look at? The NAVY blasts, bombs, and sonar attacks the ocean and the islands to our west, including Kaula and Ko Hawaii Pae Aina in Papahanaumokuakea. A small sample of ocean harm to marine mammals the NAVY projects in 7 years is: 52,470 “takes” on kohola, humpback whales, including 19,028 in Hawaii alone 9,228 “takes” on endangered ʻīlio holo i ka uaua, Hawaiian Monk Seals 349,184 “takes” on bottlenose dolphins in Hawaiian waters alone 982 “takes” on endangered False Killer Whales in Hawaii waters, and 25,700 on all false killer whale populations in Hawaii (not all populations are endangered) 63,569 “takes” on spinner dolphins in Hawaiian waters alone 93,784 “takes” on threatened or endangered blue and fin whales across the pacific Hewa. The NAVY is concealing this information from the people of Kaua’i by breaking it into a separate document called the Hawaii-California Ocean EIS. The Hawaii BLNR is not shown and asked to review for these lease renewals. They make a fake separation between what is happening on land and what is happening in our oceans, but we know that this is wrong. The ocean and the land, aina, cannot be broken apart like this. PFAS (aka forever chemicals) were identified in the soil and groundwater at a former firefighting training site on PMRF in the 1960s. In 65 years, the NAVY still hasn’t dealt with this. They say they’re still “investigating” and don’t even know how big it is or what they will do to manage it. Hewa. And did the NAVY commit to cleaning up their messes if they are expelled from these leased lands? No. The NAVY says they “could” clean up, or they could leave things like forever chemicals and landfills with old aircraft in place. They would negotiate with the “state” to manage these desecrations, making no commitments to clean things up and restore them. Hewa. The NAVY also holds the lease for 7,680 acres of underwater lands, which they are not trying to renew but claim they will continue to use the same way. Once again, they are trying to exploit public resources without accountability. Like with the $1 leases, they will also try to avoid paying for the use of public areas. Hewa. This EIS also lies about the land the base is on, claiming it was “ceded.” The illegal occupation of unceded Hawaiian Kingdom lands is significant and high impact. Saying the lands are “ceded” is a deliberate choice to legitimize the ongoing illegal US military occupation of Hawaiian lands and waters, and to minimize the impacts of the occupation. Hewa. The NAVY invites genocidal war criminal states like Israel to Hawaii, Israel who slaughters and starves Palestinans daily for the past 18 months. They come to participate in the war games like RIMPAC off the coast of Kauai, training together to better integrate their military operations. They are not welcome here and hosting them makes the people of Kauai and Hawaii complicit in their war crimes. Hewa. RIMPAC brings together the militaries of 29 nations to participate in war games, like SINKEX. For the 2024 SINKEX they sank a 40,000-tonne amphibious assault vessel off the shores of Hawaii. There is no environmental impact survey on the regular sinking of these vessels, or of hosting these vast military exercises. Hewa. All this hewa leads me to say these things: no base at PMRF. The EIS is insufficient. I support the No Action Alternative. Restore the land and water, and get the military off of Kaua’i. We cannot just uproot, however. We need to build and to think of restoration. As shown with the Na Wai Eha ruling on Maui, the government has a responsibility to proactively protect and restore water for public good when the opportunity presents itself. If we restore the land, and restore some of the water to Mana, what can be born? Wetlands with plants to clean the earth. Restored cultural practices such as paddling canoes, working loi and harvesting, sustaining and being sustained by loko i'a. Restoring habitat and native plants for reconnection for the native birds, hula, oli,

and prayer. These are the things we can grow if we center aina over destruction. Sincerely, Lana B.

DEIS Comment Letter 0017

PMRF-1135 (Record 51 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Kaimana	**Last Name** Kinzie	**Mailing List** No	
Street (none)	**City** (none)	**State** HI	**Zip** (none)
Email Gotforce@hotmail.com		**Organization**	
Attachments (none)			

Comments

To whom it may concern, I thank you for accepting public comments regarding the PMRF/NASA DEIS 2025 and the effort put forth in creating the DEIS. I stand in opposition to all three alternatives presented in the DEIS based on inaccurate and contradictory terminology. These terms include but are not limited to “ceded lands”. In Volume 1. Section 3.5.1.4, a history of ceded lands, the DEIS explains that the U.S. annexed the Hawaiian Islands via joint resolution of Congress and that Hawaiian territory was then ceded to the U.S. However, as the Navy and U.S. government are aware, the Newland’s Resolution (joint resolution 1898) was a work-around to an unsuccessful treaty of cession that was not only unilateral in nature but contrary to the wishes of the Hawaiian population as is evident in the 1897 Kuʻe Petitions. In other words, the U.S. passed a bill attempting to acquire foreign territory without a formal agreement (embodied in a treaty) between it and the independent state of the HK (Hawaiian Kingdom). Extraterritorial laws would apply to the effectiveness and limits of said bill and are viewed as an unconventional if not illegal process to acquiring sovereign territory through the lens of international law. Section 3.5.1.2 states that “state lands” were formally crown and government lands of the HK, “taken” by the Republic of Hawaii and later “ceded” to the U.S. in 1898. The Republic of Hawaii and the Provisional Government are one in the same, the former being a rebrand of the same insurgents that instigated the overthrow of the Hawaiian Monarchy with direct assistance by U.S. military armed forces. The Provisional Government was neither a government de facto nor de jure according to the Blount Report of 1893 and President Grover Cleveland. Moreover, President Cleveland stated to Congress that the Provisional Government owes its existence to an armed invasion by the U.S. military. Consequently, the Republic of Hawaii was an illegitimate government of the Hawaiian Kingdom, propped up by American imperialists, and as admitted in this section, “took” HK government and crown lands. Based upon these facts, it would be impossible for the Republic of Hawaii to cede land to the U.S. as that would imply that the Republic was the legitimate successor of the Hawaiian Monarchy and that a treaty of cession between it and the U.S. exists. Such a treaty does not exist, nor was the Republic of Hawaii a legitimate government.

DEIS Comment Letter 0017

Therefore, the U.S. government hadn't acquired any territory in the Hawaiian Islands by any legal means and certainly not by cession. It is remarked by Keao NeSmith in Volume 3 Appendices pg. 69 that the Hawaiian Kingdom continues to exist as an independent state, a designation that it has maintained since 1843. Moreover, NeSmith states that the HK is and has been occupied by the U.S. and its proxies since 1893, beginning with the landing of U.S. troops on Hawaiian soil. It is crucial to note, that as there exists no legal acquisition of land in Hawaii by the U.S., then its mere presence in the HK from 1893 till present would constitute a prolonged occupation by the U.S. government and its military. As such, the laws of occupation and international humanitarian law would apply to all HK boundaries and territories as well as its inhabitants. My recommendation to the Navy/NASA as well as the State of Hawaii is to review the above comments and facts more closely to better discern the actual relationship between the HK and the U.S. Furthermore, if in fact occupation of the HK, after exhausting all historical records and accounts to the contrary, is currently taking place by the U.S., then I would strongly suggest compliance to occupational law and international humanitarian law. It is for the reasons previously stated that I object to all alternatives presented in the DEIS until such time that the terminology therein is changed to more accurately represent the status of the lands in question. I suggest removing the term "ceded lands" and replacing it with the term "seized" or "occupied lands". This would more accurately describe the lands in question and more importantly bring into play a different set of regulatory laws designed to deal with the updated terminology. Mahalo for your consideration of these comments, -Kaimana K Kinzie

DEIS Comment Letter 0018

Kaimana Kinzie <gotforce@hotmail.com> 7/14/2025 10:27 PM

DEIS 2025 Comments

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

To whom it may concern, I thank you for accepting public comments regarding the PMRF/NASA DEIS 2025 and the effort put forth in creating the DEIS. I stand in opposition to all three alternatives presented in the DEIS based on inaccurate and contradictory terminology. These terms include but are not limited to “ceded lands”.

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Section 3.5.1.2 states that “state lands” were formally crown and government lands of the HK, “taken” by the Republic of Hawaii and later “ceded” to the U.S. in 1898. The Republic of Hawaii and the Provisional Government are one in the same, the former being a rebrand of the same insurgents that instigated the overthrow of the Hawaiian Monarchy with direct assistance by U.S. military armed forces. The Provisional Government was neither a government de facto nor de jure according to the Blount Report of 1893 and President Grover Cleveland. Moreover, President Cleveland stated to Congress that the Provisional Government owes its existence to an armed invasion by the U.S. military. Consequently, the Republic of Hawaii was an illegitimate government of the Hawaiian Kingdom, propped up by American imperialists, and as admitted in this section, “took” HK government and crown lands. Based upon these facts, it would be impossible for the Republic of Hawaii to cede land to the U.S. as that would imply that the Republic was the legitimate successor of the Hawaiian Monarchy and that a treaty of cession between it and the U.S. exists. Such a treaty does not exist, nor was the Republic of Hawaii a legitimate government. Therefore, the U.S. government hadn’t acquired any territory in the Hawaiian Islands by any legal means and certainly not by cession.

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and accounts to the contrary, is currently taking place by the U.S., then I would strongly suggest compliance to occupational law and international humanitarian law.

It is for the reasons previously stated that I object to all alternatives presented in the DEIS until such time that the terminology therein is changed to more accurately represent the status of the lands in question. I suggest removing the term “ceded lands” and replacing it with the term “seized” or “occupied lands”. This would more accurately describe the lands in question and more importantly bring into play a different set of regulatory laws designed to deal with the updated terminology.

Mahalo for your consideration of these comments,

-Kaimana K Kinzie

DEIS Comment Letter 0019

TESTIMONY REGARDING THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PMRF AND KŌKEʻE PARK GEOPHYSICAL OBSERVATORY

To the Navy and NASA,

I am submitting this testimony to express serious concerns regarding the current Draft Environmental Impact Statement (EIS) for the Proposed United States (U.S.) Navy Pacific Missile Range Facility (PMRF) and the National Aeronautics and Space Administration (NASA) Kōkeʻe Park Geophysical Observatory.

My primary concern is that this Draft EIS is being presented before the September 2024 PMRF Land-Based Training and Testing Draft Environmental Assessment (EA) has been finalized and published. It is my understanding that the final EA was expected in January 2025. An EA's purpose is to determine if a proposed action will have significant environmental impacts, potentially necessitating a more comprehensive EIS. Proceeding with this PMRF and Kōkeʻe Park Geophysical Observatory EIS without a finalized EA for related training and testing activities that would take place on the leased land is doing things in the wrong order - Out of Sequence.

Incomplete Cumulative Impact Assessment

The impacts described in this EIS are inappropriately separated from the cumulative impacts of the associated September 2024 EA training activities. These training activities are a substantial part of the overall operations that this EIS aims to support. It is illogical and irresponsible to consider new leases and expanded operations when the actual uses of the PMRF Barking Sands lease land are not yet codified by a final September 2024 PMRF Land-Based Training and Testing EA.

Unjustified Expansion of Activities

In the Training EA the Navy is proposing a significant increase in training and testing activities at PMRF, from 78 to 258 annually. This represents a 231% increase, or 3.3 times more activities overall, which is a dramatic and significant intensification.

Specifically, the proposed increase in annual activities on Kaʻula Island from 26 to 55 is a 112% increase, more than doubling the current number. These are alarming and substantial increases. The September 2024 EA, which proposes expanded military activities at PMRF and Kaʻula Island, does not accurately or adequately assess the impacts that increased bombing of Kaʻula Island and increased military exercises will have on the local environment.

Disregard for Ka'ula Island's Ecological and Cultural Significance

The designation of Ka'ula Island as "uninhabited" is both inappropriate and factually incorrect, especially when considering the abundant wildlife that lives and relies on it. The assertion that "wildlife species have occurred at PMRF for decades during current training and testing activities, and no adverse affects have been observed" (ES-7) is baseless and absurd. Ka'ula provides crucial seabird habitat, protected from sea-level rise and predatory species, making this claim demonstrably false.

Furthermore, Ka'ula is a well-known and vital fishing ground for the local community. The current Training EA fails to examine the impacts on local fisheries and potential impacts to traditional fishing and gathering practices. The EA is severely insufficient in assessing the cumulative impacts to Ka'ula Island.

Beyond its ecological importance, Ka'ula is a sacred site. It is named in "Ke Lei Maila," one of the most popular oli (chants) used across Hawai'i, is a traditional place to harvest wildlife, and holds profound spiritual significance in the birth of the islands – The Kumulipo which was referenced in the EIS. To subject such a culturally significant site to increased military attack and bombing is an act of desecration.

Underestimated Ocean Impacts

PMRF conducts missile launches from land-based launching pads at Barking Sands, including 35 proposed annual launch activities that will be "intercepted" (exploded) offshore, and 3 live-firing activities that could directly impact ocean ecosystems.

The EA inappropriately dismisses these ocean impacts, stating they were analyzed in previous documents. These prior documents are outdated and, critically, do not account for the proposed increase in activities. This omission is a massive oversight regarding the cumulative effects of military operations in the Hawaiian Islands, as well as the effects of these individual land-based activities. This approach is in direct defiance of regulations defining significance, which state that "significance cannot be avoided by terming an action temporary or by breaking it down into small component parts."

Support for the No Action Alternative

While this EIS is commendably well-documented, even referencing the Kumulipo, it remains "the horse before the cart" due to the aforementioned deficiencies.

Therefore, the only acceptable action regarding the EIS under discussion today is Alternative 3: No Action Alternative. This alternative would mean the State of Hawai'i would not issue the Navy and NASA any real estate agreements for state lands on Kaua'i after the

expiration of the current leases and easements between 2027 and 2030. The existing real estate agreements for 8,172 acres with the Navy and 23 acres with NASA would expire.

As stated in the EIS's Cultural Studies (Appendix F, Section 3.3.1.4.1), *"Some Native Hawaiian participants in the CIA interviews and public scoping meetings report feelings of loss and injustice when ceded lands are possessed by non-Hawaiian entities, especially to the U.S. Government whom they accuse of illegally occupying the Hawaiian Islands. For those who feel this way, the No Action Alternative could result in long-term beneficial effects because the ceded lands would be back in possession of the State of Hawai'i and potentially available for use by Native Hawaiians."* This perspective underscores the profound cultural and historical implications of these land agreements.

Choosing the No Action Alternative would be a crucial step towards respecting the process of EA and EIS, the environment, cultural heritage, and the well-being of the Kaua'i community.

DEIS Comment Letter 0020

joe felix <josefelix808@gmail.com> 7/15/2025 2:18 AM

Comments

To info@pmrf-kpgo-eis.com

To whom it may concern,

Please see attached comment form.

Thanks & Peace to you!

José Felix-Keamoai
President, Kekaha Pop Warner Organization
Cell: (808) 651-6873

- pmrf-kpgo-eis_comment-form.pdf (367 KB)

Public Meeting Comment Form

Date: 14 July 2025

Please submit comments on the Draft EIS by August 7, 2025, 11:59 p.m. HST. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

- In person at a public meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by August 7, 2025 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

I strongly support the proposed alternative #1, where a fair market value to continue a lease agreement with a promise of continuous commitments to protect the environment and wildlife in the area.

Please provide your mailing address to receive future notifications about the project.

1. Name: Jose Felix-Keamoai
2. Organization/Affiliation (if applicable): Kekaha Pop Warner Organization
3. Mailing Address: P.O. Box 70 Kekaha, HI 96752

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

Please turn in this form at a public meeting, submit online at PMRF-KPGO-EIS.com, send by email to info@PMRF-KPGO-EIS.com, or mail to:

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

DEIS Comment Letter 0020

** Please Print Clearly **

YOUR INPUT MATTERS

Visit PMRF-KPGO-EIS.com

Scan QR code for project website

DEIS Comment Letter 0021

joe felix <josefelix808@gmail.com> 7/15/2025 2:33 AM

Comments on the Draft EIS

To info@pmrf-kpgo-eis.com

Please see attached comments on draft EIS

Thanks & Peace to you!

José Felix-Keamoai
Cell: (808) 651-6873

- pmrf-kpgo-eis_comment-form.pdf (375 KB)

Public Meeting Comment Form

Date: 14 July 2025

Please submit comments on the Draft EIS by August 7, 2025, 11:59 p.m. HST. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

- In person at a public meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by August 7, 2025 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

PMRF-KPGO has been a good and responsible lease holder so far. The employment and business opportunities that are provided are very important to our local communities.

Please provide your mailing address to receive future notifications about the project.

1. Name: Jose Felix-Keamoai
2. Organization/Affiliation (if applicable): N/A
3. Mailing Address: P.O. Box 50975 Ele'ele, Hawaii 96752

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

Please turn in this form at a public meeting, submit online at PMRF-KPGO-EIS.com, send by email to info@PMRF-KPGO-EIS.com, or mail to:

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

DEIS Comment Letter 0021

** Please Print Clearly **

YOUR INPUT MATTERS

Visit PMRF-KPGO-EIS.com

Scan QR code for project website

DEIS Comment Letter 0022

cindy Freitas <makainanqi@gmail.com> 7/15/2025 11:31 PM

Re: Public Meeting for the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate Environmental Impact Statement Confirmation

To Project Support <info@pmrf-kpgo-eis.com>

For some reason the email that I have does not work so I'm sending my testimony/comment this way. (email: PMRF-LBT-EA-Comments@us.navy.mil.)
Thank you
Cindy Freitas

On Tue, Jul 15, 2025 at 4:48 PM Project Support <no-reply@zoomgov.com> wrote:

> Hi Cindy freitas,
> Thank you for registering for Public Meeting for the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate Environmental Impact Statement.
> You can find information about this webinar below.
>
> **Public Meeting for the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate Environmental Impact Statement**
>
> | | |
> |---|---|
> | Date & Time | Jul 15, 2025 05:00 PM Hawaii |
> | Webinar ID | 160 646 1529 |
> | Passcode | 174862 |
>
> **Add to:** Google Calendar | Outlook Calendar(.ICS) | Yahoo Calendar
>
> To edit or cancel your registration details, click here. You can cancel your registration before Jul 15, 2025 05:00 PM.
>
> Please submit any questions to: info@PMRF-KPGO-EIS.com
> Thank you!

DEIS Comment Letter 0022

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San Jose, CA 95113

- Pacific Missile Range Facility on Kaua'i.docx (11 KB)

DEIS Comment Letter 0022

July 15, 2025

Cindy Freitas

Naval Facilities Engineering Systems
Command Pacific/EV22
Attention: PMRF LBT EA Project Manager
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860

RE: OPPOSE THE U.S. Navy's proposal draft environmental assessment

He Mele komo a he mele aloha no na kupuna o ke au i hala Aloha mai kakou.

Aloha,

My name is Cindy Freitas and I'm a Native Hawaiian descended of the native inhabitants of Hawai'i prior to 1778 and born and raised in Hawai'i.
I am also a practitioner who still practice the cultural traditional customary practices that was instill in me by my grandparents at a young age from mauka (MOUNTAIN TO SEA) to makai in many areas.

I am writing to **oppose the proposed increase in military training, testing, and bombing exercises at Ka'ula Island** as outlined in the Draft Environmental Assessment (EA) for the Pacific Missile Range Facility. I am especially concerned about the EA's **insufficient treatment of cultural and historical impacts** on Ka'ula Island, a location with deep significance to Native Hawaiians.

Although the EA may fulfill minimal legal requirements under the National Environmental Policy Act (NEPA), it **fails to fully acknowledge the cultural, spiritual, and historical importance of Ka'ula Island.** The assertion that there are "no known historic properties" due to a lack of archaeological remains is not a valid justification for the continuation or expansion of destructive activities.

Ka'ula Island exists within a living Hawaiian cultural landscape, and it deserves more than a checkbox-style assessment. Native Hawaiian oral traditions, spiritual practices, and ancestral connections to this 'āina are essential components of cultural significance, and **must be evaluated with full consultation** and respect. This is a requirement under Section 106 of the National Historic Preservation Act (NHPA) and Executive Order 13007 concerning sacred sites.

Moreover, the **restricted military access to Ka'ula** means Native Hawaiians have been historically denied the opportunity to document, access, or steward this place. This lack of access should not be used as an excuse to claim the island holds no cultural value.

Given the long legacy of military damage to Hawaiian lands—most notably Kaho'olawe—it is unacceptable to further militarize and desecrate another sacred island. Until the Navy:

- Engages in **genuine, good-faith consultation** with Native Hawaiian organizations and cultural practitioners,
- Conducts a **culturally competent, independent assessment** of Ka‘ula Island,
- And prioritizes cultural preservation over destructive exercises,

this proposal should be **withdrawn in its current form.**

Mahalo,

__/s/___

Cindy Freitas

DEIS Comment Letter 0023

Kaylene Sheldon <kauwilamahina@icloud.com> 7/15/2025 11:40 PM

Comments on the Army's Draft EIS

To info@pmrf-kpgo-eis.com

Aloha kākou,
My name is Kauwila Sheldon. My maternal side comes from the Kaumuali'i lines from Kaua'i and my father's praternal side comes from parts of Kaua'i.
Koke'e is a special wahi pana as well as all of Kaua'i as it is my "mainland" and the source of where my lineage comes from. This Environmental Impact report, I have not seen yet. I would like to request that it be made available. I would like to know the Navy's activities and it's impact on our endangered species and marine life. I would also like to know how the Navy stores their fuel tanks. The Navy has a bad reputation of leaving chemicals, weapons, ordinances and pollution in our islands. I oppose any further leases and military activities being done by the Navy on Kaua'i. I think the Navy is dangerous and poses a threat to our environment and wahi pana.
Mahalo,
Kauwila Sheldon
Sent from my iPhone

DEIS Comment Letter 0024

cindy Freitas <makainanqi@gmail.com> 7/16/2025 12:13 AM

Pacific Missile Range Facility on Kaua'i

To Project Support <info@pmrf-kpgo-eis.com>

Aloha,
Mahalo Cindy Freitas

- Pacific Missile Range Facility on Kaua‘i.docx (11 KB)

DEIS Comment Letter 0024

July 15, 2025

Cindy Freitas

Naval Facilities Engineering Systems
Command Pacific/EV22
Attention: PMRF LBT EA Project Manager
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860

RE: OPPOSE THE U.S. Navy's proposal draft environmental assessment

He Mele komo a he mele aloha no na kupuna o ke au i hala Aloha mai kakou.

Aloha,

My name is Cindy Freitas and I'm a Native Hawaiian descended of the native inhabitants of Hawai'i prior to 1778 and born and raised in Hawai'i.
I am also a practitioner who still practice the cultural traditional customary practices that was instill in me by my grandparents at a young age from mauka (MOUNTAIN TO SEA) to makai in many areas.

I am writing to **oppose the proposed increase in military training, testing, and bombing exercises at Ka'ula Island** as outlined in the Draft Environmental Assessment (EA) for the Pacific Missile Range Facility. I am especially concerned about the EA's **insufficient treatment of cultural and historical impacts** on Ka'ula Island, a location with deep significance to Native Hawaiians.

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Moreover, the **restricted military access to Ka'ula** means Native Hawaiians have been historically denied the opportunity to document, access, or steward this place. This lack of access should not be used as an excuse to claim the island holds no cultural value.

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- Engages in **genuine, good-faith consultation** with Native Hawaiian organizations and cultural practitioners,
- Conducts a **culturally competent, independent assessment** of Ka‘ula Island,
- And prioritizes cultural preservation over destructive exercises,

this proposal should be **withdrawn in its current form.**

Mahalo,

__/s/___

Cindy Freitas

PMRF-1143 (Record 50 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Daynette (Dee)	**Last Name** Morikawa	**Mailing List** Yes	
Street 415 S. Beretania Street #0434	**City** Honolulu	**State** HI	**Zip** (none)
Email repmorikawa@capitol.hawaii.gov		**Organization** Hawaii State House of Representatives	
Attachments (none)			
Comments PMRF is a vital part of Kauai and especially West Kauai. I have represented South/West Kauai and Niihau for 15 years. PMRF has shown how they see cultural and natural resources preservation as an important part of community concerns. Their efforts have proven that they truly care about the environment and our people through many community service programs. They are a tremendous support to our economy and provide future generations with innovative career choices. I am committed to work with them to further support community concerns and to assure that their existence on Kauai continues.			

PMRF-1144 (Record 49 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Doris	**Last Name** Jaynes	**Mailing List** Yes	
Street 308 Aina Loli Place	**City** Kapa‘a	**State** HI	**Zip** (none)
Email dorisjaynes@aol.com		**Organization**	
Attachments (none)			
Comments We are all aware that our Government has not had a history of responsibility in caring for the property on which we house our Army, Navy or Air Force personnel or projects so you have a fight ahead and we know we need you but we hope that our Government agencies will take great concern in the manner in which they manage our lands especially here in Hawaii . All the peoples of these islands have great love of the 'AINA". We are grateful for your presence and only ask that you respect our land and our citizens. Take Great Care. Mahalo, Doris Jaynes, Kauai			

DEIS Comment Letter 0027

STEPHENIE BLAKEMORE <stephenieblakemore@sbcglobal.net> 7/17/2025 1:23 AM

Re: Reminder: Public Meeting for the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate Environmental Impact Statement starts in 1 hour

To Project Support <info@pmrf-kpgo-eis.com>

Please send me an email that provides a mailing address to send my EIS input.
What I heard tonight was poweful truth..any one speaker from yhe community supports this. That was powerful truth.

Sent from AT&T Yahoo Mail on Android

On Wed, Jul 16, 2025 at 3:55 PM, Project Support <no-reply@zoomgov.com> wrote:

Hi Stephenie Blakemore,

This is a reminder that your webinar will begin in 1 hour:

Public Meeting for the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate Environmental Impact Statement

Date & Time	Jul 16, 2025 05:00 PM Hawaii
Webinar ID	160 760 7604
Passcode	498308
Description	Live broadcast of the public meeting at the Kekaha Neighborhood Center. Webinar opens at 5:00 p.m. HST. Navy and NASA presentation from 6:00 p.m. to 6:30 p.m. HST, followed by oral comments from the public attending in person and online from 6:30 p.m. to 8 p.m. HST.

Add to: Google Calendar | Outlook Calendar(.ICS) | Yahoo Calendar

You can cancel your registration at any time.

Please submit any questions to: info@PMRF-KPGO-EIS.com
Thank you!

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San Jose, CA 95113

DEIS Comment Letter 0028

Terrill James Kane Alii Williams <tkanealiiw@gmail.com> 7/17/2025 6:02 PM

Comments for Draft Environmental Impact Statement for the Proposed United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Kōkeʻe Park Geophysical Observatory Real Estate, Kauaʻi, Hawaiʻi;

To info@pmrf-kpgo-eis.com

Please see the attachment in this email regarding my comments for:

Draft Environmental Impact Statement for the Proposed United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Kōkeʻe Park Geophysical Observatory Real Estate, Kauaʻi, Hawaiʻi; Tax Map Keys: 4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)

Mahalo,
Terrill James Kane Alii Williams, MBA
Ohana of Papapa of Niihau
Heir to Royal Patent 1615 to PAPAPA

- KanealiiWilliams_Comments for DEIS for PMRF and KPGO.pdf (18 MB)

DEIS Comment Letter 0028

July 17, 2025
Terrill James Kane Alii Williams, MBA

Pacific Missile Range Facility
United States Department of the Navy
Email: info@PMRF-KPGO-EIS.com

Formal Notice Regarding --- Draft Environmental Impact Statement for the Proposed United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Kōkeʻe Park Geophysical Observatory Real Estate, Kauaʻi, Hawaiʻi; Tax Map Keys: 4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.):

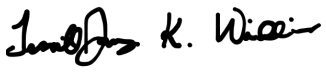
I am providing comments in opposition to the current Draft Environment Impact Statement (DEIS) by the Pacific Missile Range Facility (PMRF).

Although the DEIS pertains to renewal of its lease for lands on Kauai, it does not provide a comprehensive layout of all operations that are consequences of that lease, including in the ocean which the PMRF borders [Exhibit 1]. There needs to be information explicitly identifying PMRF's nautical boundaries. Considering that PMRF currently is located on the shores boarding the Kaulakahi Channel, a traditional migratory channel between the Kauai and Niihau that my ancestors used, there needs to be more information regarding impact on the Kaulakahi Channel, including the surrounding water of the island of Niihau and Native Hawaiian traditional and customary practices.

The Ka Paakai Analysis is incomplete. The Hawaii State Aha Moku, housed within the State of Hawaii Department of Land and Natural Resources (DLNR), must also be consulted. The lineal descendants of the island of Niihau must also be consulted. Furthermore, representatives of the Robinson family do not speak on behalf of all the lineal descendants of Niihau nor are the 'green light' for all decisions or dealings with PMRF impacting Niihau. As previously made known to PMRF, I am a lineal descent of the Kapalehua ohana of Niihau (different from the Kapahulehua ohana of Niihau) and through the Kapalehua ohana, I am within the ohana of Papapa of Niihau. This was provided to PMRF via my genealogy affidavit [Exhibit 2] that includes evidence of my heirship to the lands identified in Royal Patent 1615 to PAPAPA --- that are also stipulated in Royal Patent 2944 to JAMES SINCLAIR --- and Survey Notes to Royal Patent 1615 to PAPAPA & OTHERS on Niihau that were submitted as part of my comments on the recent Draft Environmental Assessment concerning Kaula sent via email on September 27, 2024. Additionally through PMRF's processeses concerning Kaula, PMRF has provided several receipts acknowledging me as "Ohana of Papapa of Niihau", including in the 11000, Ser N4F/0126, LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUAʻI, HAWAIʻI (HICRIS Project No. 2024PR01077) dated February 26, 2025 [Exhibit 3] as well as the 11000, Ser N4F/0370 SUBJECT: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUAʻI, HAWAIʻI (HICRIS Project No. 2024PR01077) dated June 04, 2025 [Exhibit 4]; these communications were sent by PMRF to the DLNR via email.

At no point was I contacted regarding this DEIS, its impacts on the Kaulakahi Channel, its impacts to the surrounding waters of Niihau, its impacts to the island of Niihau, or its impacts to the people of Niihau; my comments here do not constitute consultation. I do not consent to members of the Robsinon family speaking on my behalf and as such, I expect to be directly contacted by PMRF regarding this matter moving forward. Furthermore, PMRF needs to begin the process of cleanup as well as begin the process of having the lands on Kauai detailed in the lease to be registered as Traditional Cultural Property.

Mahalo,



Terrill James Kane Alii Williams, MBA
Ohana of Papapa of Niihau
Heir to Royal Patent 1615 to PAPAPA
tkanealiiw@gmail.com

Exhibit 1

DEIS Comment Letter 0028

PMRF SUPPORTS ACTIVITIES IN THE WATERS OFF KAUA'I, INCLUDING ON AND AROUND KA'ULA ISLAND AND WITHIN THE "TEMPORARY OPERATING AREA," WHICH INCLUDES PAPAHĀNAUMOKUĀKEA.

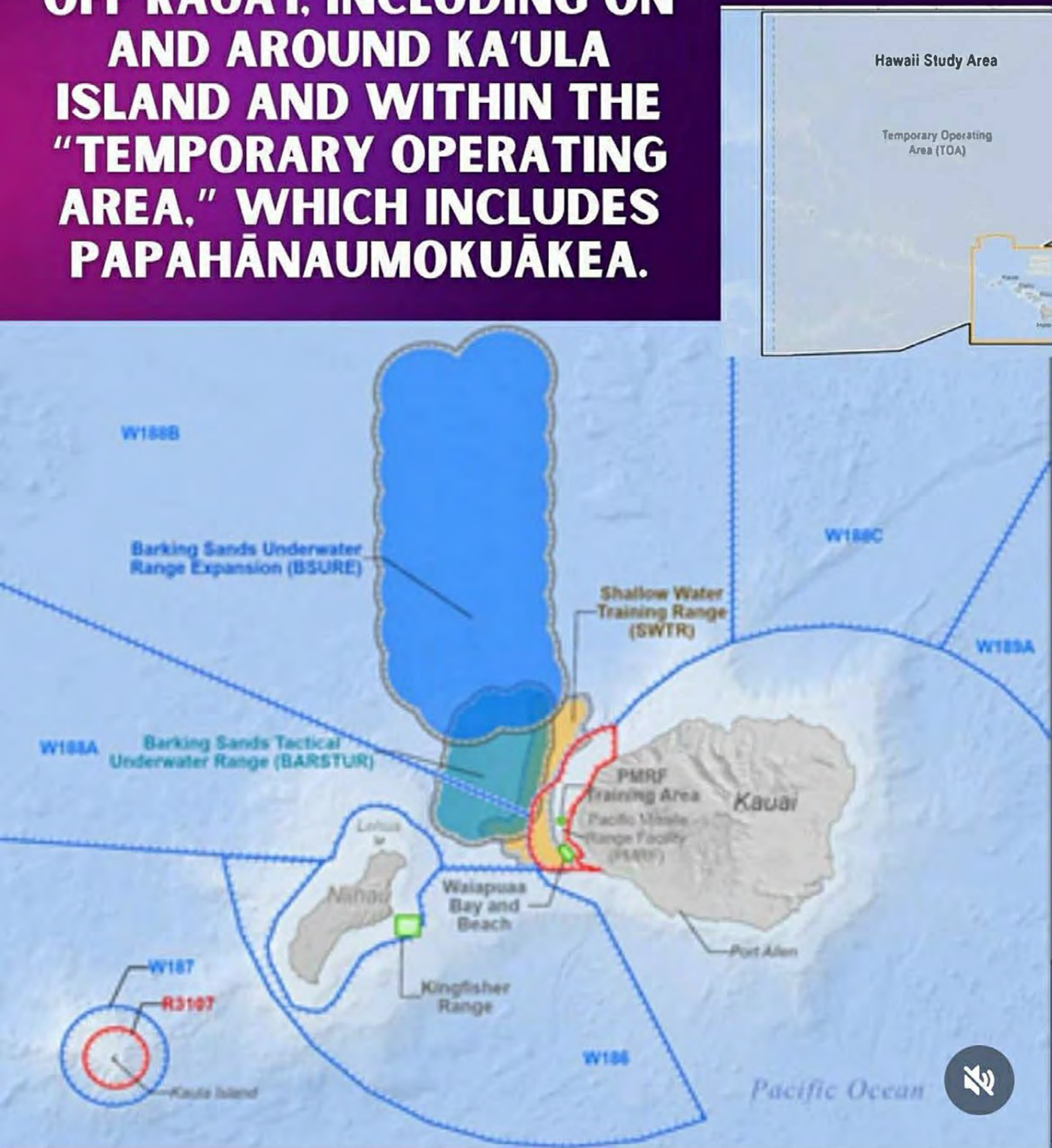


Exhibit 2

THE ORIGINAL OF THE DOCUMENT
RECORDED AS FOLLOWS:
STATE OF HAWAII
BUREAU OF CONVEYANCES
DOCUMENT NO.
DATE - TIME
Doc A - 88550436
5/9/2014 9:00 AM

LAND COURT REGULAR SYSTEM

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After Recording return by X Mail or Pick-up. Phone#: (619) 366-9077

Terrill James Kane Alii Williams
P.O. Box 790172
Paia, HI 96779

TITLE OF DOCUMENT: AFFIDAVIT OF: Terrill James Kane Alii Williams
TAX MAP KEY(S): (1)-1-001-001-0000
LAND COMMISSION AWARD:
ROYAL PATENT: 1615

This document consists of 39 pages.

State of Hawaii
County of Maui

This instrument was made on the 8th day of May in the year 2024 by Terrill James Kane Alii Williams who resides at P.O. Box 790172, Paia, HI 96779 upon first duly sworn desposes and sayeth:

First I, Terrill James Kane Alii Williams, am of lawful age and competent; and was born on September 20, 1996 ads proven by Birth Certificate (Exhibit A1/Mea A1)

Second That Staceydee Pohaikealoha Ah Loo is my mother and was born on January 20, 1970 proven by Certification of Live Birth (Exhibit B1/Mea B1).

Third That Diane Kuuipo Shaw, born on October 24, 1943, is the mother of Staceydee Pohaikealoha Ah Loo proven through Certification of Live Birth. (Exhibit C1/Mea C1) and therefore is my Grandmother.

Fourth Diane Kuuipo Shaw was adopted from her biological mother, Marcellina Contrades, and her original name was Frances Alicia Tamburi as shown in Amended Birth (Exhibit D1/Mea D1) and Birth Record (Exhibit D2). Marcellina Contrades therefore is my great grandmother.

Fifth That Kahele Papoko is the mother of Marcellina Contrades proven by Delayed Certificate of Birth (Exhibit E1/Mea E2) and Record of Issue of License to Marry (Exhibit E2/Mea E2) and therefore is my great great grandmother.

Sixth That Nohoanu Kapalehua is the mother of Kahele Papaoko proven by Record of Death (Exhibit F1/Mea F1) and therefore is my great great great grandmother.

Seventh That Keaouli Kapalehua is the mother of Nohoanu Kapalehua proven by Death Probate (Exhibit G1/Mea G1) and therefore is my great great great great grandmother.

Eighth That Keaouli Kapalehua was also known as Keouli as proven by Marriage Certificate (Exhibit H1/Mea H1) and Record of Marriage (Exhibit H2/Mea H2).

Ninth That Namauiki is the father of Keouli proven by Death Probate (Exhibit I1/Mea I1) and therefore is my great great great great great grandfather.

Tenth That Kelekau is the mother of Namauiki proven by Death Probate (Exhibit I1/Mea I1) and therefore is my great great great great great great grandmother.

Eleventh That Kelekau was next-of-kin as first cousin to Papapa. Nieke is the mother of Kelekau, Palauakeke is the mother of Papapa. Nieke is the younger sister of Palauakeke by the same parents, Waha is the father and Namue is the mother, proven by Death Probate (Exhibit I1/Mea I1)

Twelfth That Papapa is the awardee Royal Patent 1615 proven by certified copy of Royal Patent 2944 Palapala Sila Nui, Ano Allodio (allodial title) (Exhibit J1), by certified copy of Royal Patent 1615 Palapala Sila Nui, Ano Allodio (allodial title) (Exhibit J2), and by certified copy of Survey Boundaries (Exhibit J3)

O teia mea palapala i hatu ia ma ka la 8 o Mei i ka makahiti 2024, na Terrill James Kane Alii Williams e noho ma P.O. Box 790172, Paia, HI 96779 e olelo me ta oiaio:

Etahi O au, Terrill James Kane Alii Williams, i hanau ia ma la 20 o Kepakemapa i ka makahiti 1996 i hooiaio na Birth Certificate (Exhibit A1/Mea A1)

Elua O Staceydee Pohaikealoha Ah Loo tou matuahine i hanau ia ma ka la 20 o Ianuali i ka makahiti 1970 i hooiaio na Certification of Live Birth (Exhibit B1/Mea B1)

Ekolu O Diane Kuuipo Shaw i hanau i ma ka la 24 o Okakopa i ka makahiti 1943, oia ka matuahine o Stacey Pohaikealoha Ah Loo i hooiaio na Certification of Live Birth (Exhibit C1/Mea C1), no laila oia tou tupunahine.

Eha Ua hanai ia atu o Diane Kuuipo Shaw mai tona matuahine ponoi o Marcellina Contrades. O ta inoa ponoi o Diane Kuupio Shaw mamua o ta hanai ana, oia o Frances Alicia Tamburi i hooiaio na Amended Birth (Exhibit D1/Mea D1) a me Birth Record (Exhibit D2). O Marcellina Contrades tou tupunahine kuatahi.

Elima O Kahele Papoko ta matuahine o Marcellina Contrades i hooiaio na Delayed Certificate of Birth (Exhibit E1/Mea E1) a me Record of Issue of License to Marry (Exhibit E2/Mea E2), no laila oia tou tupunahine kualua.

Eono O Nohoanu Kapalehua ta matuahine o Kahele Papoko i hooiaio na Record of Death (Exhibit F1/Mea F1), no laila oia tou tupunahine kuakolu.

Ehitu O Keaouli Kapalehua ta matuahine o Nohoanu Kapalehua i hooiaio na Death Probate (Exhibit G1/Mea G1), no laila oia tou tupunahine kuaha.

Ewalu O Keaouli Kapalehua, oia no o Keouli i hooiaio na Marriage Certificate (Exhibit H1/Mea H1) a me Record of Marriage (Exhibit H1/Mea H2).

Eiwa O Namauiki ta matuakane o Keouli i hooiaio na Death Probate (Exhibit I1/Mea I1), no laila oia tou tupunakane kualima.

Umi O Kelekau ta matuahine o Namauiki i hooiaio na Death Probate (Exhibit I1/Mea I1), no laila oia tou tupunahine kuaono.

Umitumakahi O Kelekau te kaituahine o Papapa. O Nieke ta matuahine o Kelekau, o Palauakeke ta matuahine o Papapa. O Nieke te kaitaina o Palauakeke na na matua hootahi, o Waha ta matuakane laua o Namue ta matuahine, i hooiaio na Death Probate (Exhibit I1/Mea I1)

Umitumalua Ua haawi ia ta Royal Patent 1615 ia Papapa i hooiaio na Royal Patent 2944 Palapala Sila Nui Ano Allodio (Exhibit J1/Mea J1), na Royal Patent 1615 Palapala Sila Nui Ano Allodio (Exhibit J2/Mea J2), a me Survey Boundaries (Exhibit J3/Mea J3).

The above instrument and information contained herein are true and correct to the best of my knowledge, are set-forth for cause, superseding and all previous denials of aforementioned. I may have made, and my signature and seal hereinafter are the voluntary act of my own hands and FURTHERMORE SAYETH NAUGHT.

Subscribed, Sealed and Affirmed this 8th day of May in the year of our lord And savior, Two Thousand and Twenty-Four.

Terrill James Kane Alii Williams

STATE OF HAWAII)
) SS:
COUNTY OF MAUI)

Subscribed and sworn before me this day: May 8, 2024

Print name, Kimberly Uradomo
Notary Public State of Hawaii Comm exp. 07-02-2026
My commission expires: Second Judicial Circuit

KIMBERLY URADOMO NOTARY 05-397 PUBLIC STATE OF HAWAII

CERTIFICATION
Document Date: 05/08/2024 Pages: 39
Notary Name: Second Circuit
Document Description: Affidavit of Terrill James Kane Alii Williams
Notary Signature:

Kimberly Uradomo
Commission expires: 7/2/2026

KIMBERLY URADOMO NOTARY 05-397 PUBLIC STATE OF HAWAII

CERTIFICATE OF VITAL RECORD

VERIFY PRESENCE OF WATERMARK — HOLD AT AN ANGLE TO VIEW

5530619

COMMONWEALTH OF VIRGINIA

DEPARTMENT OF HEALTH – DIVISION OF VITAL RECORDS

CERTIFICATE OF LIVE BIRTH

STATE FILE NUMBER:	145-96-062498
NAME OF REGISTRANT:	TERRILL JAMES KANE ALII WILLIAMS
DATE OF BIRTH:	SEPTEMBER 20, 1996 **SEX:** MALE
PLACE OF BIRTH:	PORTSMOUTH, VIRGINIA
MAIDEN NAME OF MOTHER:	STACEYDEE POHAIKEALDHA AHLOO
AGE OF MOTHER:	26
MOTHER'S PLACE OF BIRTH:	HAWAII
DATE RECORD FILED:	OCTOBER 11, 1996

VOID IF ALTERED OR ERASED

This is to certify that this is a true and correct reproduction or abstract of the official record filed with the Virginia Department Of Health, Richmond, Virginia

DATE ISSUED **February 15, 2013**

Janet M Rainey

Janet M. Rainey, State Registrar

Do not accept unless on security paper with the seal of Virginia Department of Health, Vital Statistics in the lower left hand corner. Section 32.1-272, Code of Virginia, as amended.

VS 15B

VOID WITHOUT WATERMARK OR IF ALTERED OR ERASED

CERTIFICATE OF LIVE BIRTH

STATE OF HAWAII
DEPARTMENT OF HEALTH

CERTIFICATE NO. **151 1970 - 000949**

CHILD'S NAME
STACEY DEE POHAIKEALOHA AH LOO

DATE OF BIRTH
January 20, 1970

HOUR OF BIRTH
11:19 AM

SEX
FEMALE

CITY, TOWN OR LOCATION OF BIRTH
KAILUA

COUNTY OF BIRTH
HONOLULU

MOTHER'S MAIDEN NAME
DIANE KUUIPO SHAW

MOTHER'S RACE
HAWAIIAN CAUCASIAN INDIAN

DATE FILED BY REGISTRAR
January 26, 1970

OHSM 1.2 (Rev.10/14) LASER This copy serves as prima facie evidence of the fact of birth in any court proceeding. [HRS 338-13(b), 338-15] 1695179

ANY ALTERATIONS INVALIDATE THIS CERTIFICATE

CERTIFICATION OF LIVE BIRTH

STATE OF HAWAII
HONOLULU

DEPARTMENT OF HEALTH
HAWAII U.S.A.

CERTIFICATE NO. 151 1943 - 000712

CHILD'S NAME
DIANE KUUIPO SHAW

DATE OF BIRTH
October 24, 1943

HOUR OF BIRTH
9:50 PM

SEX
FEMALE

CITY, TOWN OR LOCATION OF BIRTH
HONOLULU

ISLAND OF BIRTH
OAHU

COUNTY OF BIRTH
HONOLULU

MOTHER'S MAIDEN NAME
MARY KALEI

MOTHER'S RACE
PART HAWAIIAN

FATHER'S NAME
ALEXANDER SHAW

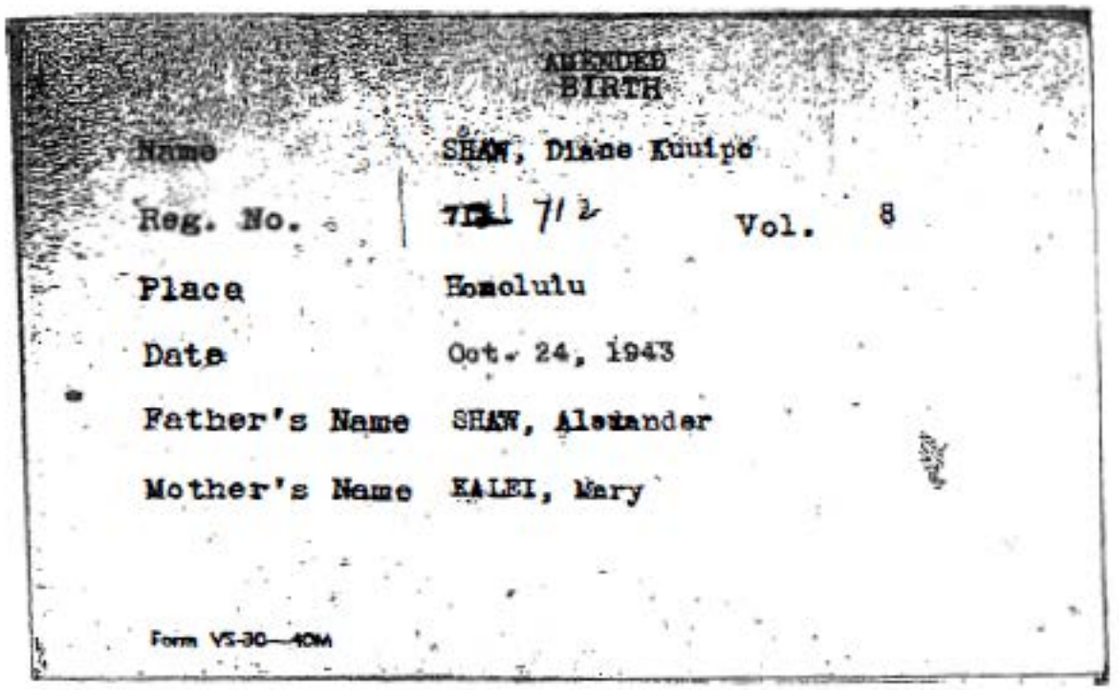
FATHER'S RACE
CAUCASIAN

DATE FILED BY REGISTRAR
October 29,1943

OHSM 1.1 (Rev 1401) LASER

This copy serves as prima facie evidence of the fact of birth in any court proceeding. [HRS 338-13(b), 338-18]

ANY ALTERATIONS INVALIDATE THIS CERTIFICATE



AMENDED
BIRTH

Name SHAW, Diane Kuuipo

Reg. No. 712 Vol. 8

Place Honolulu

Date Oct. 24, 1943

Father's Name SHAW, Alexander

Mother's Name KALEI, Mary

Form VS-30—40M

AMENDED

BIRTH

Name	TAMBURI, Frances Alicia
Reg. No.	4062 Vol. 804
Place	Honolulu
Date	Oct. 24, 1943
Father's Name	TAMBURI, HARRY
Mother's Name	CONTRADES, MARCELLINA

See Amended Record, Reg. No. 712 Vol. 8

Form V.S. 10—6M—APCO 222229

DELAYED CERTIFICATE OF BIRTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
RESEARCH AND STATISTICS OFFICE

FILE NUMBER DB 3-00638

1. FULL NAME OF REGISTRANT	a. First: MARCELLINA; b. Middle: ; c. Last: CONTRADES
2. SEX	Female
3. CHILDREN BORN TO MOTHER	a. Total: 4; b. This Birth: 4
4. DATE OF BIRTH (Month, Day, Year)	February 3, 1908
5. PLACE OF BIRTH	a. City or Town: Kapahi; b. Island: Kauai; c. County: Kauai
6. FULL NAME OF FATHER	a. First: Jose; b. Middle: ; c. Last: Contrades
7. PLACE OF BIRTH	Hawaii
8. FULL MAIDEN NAME OF MOTHER	a. First: Rose; b. Middle: ; c. Last:
9. PLACE OF BIRTH	Hawaii
9. I DECLARE UPON OATH THAT THE ABOVE STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.	10a. SIGNATURE OF AFFIANT: Marcellina Contrades; 10b. RELATIONSHIP TO REGISTRANT: Self
DATE SIGNED	OCT 24 1974
12. CURRENT ADDRESS (Number & Street, RFD or P.O. Box, City or Town, State, Zip Code)	1311 Sixth Avenue, Honolulu, HI 96816
NOTARY'S SEAL	State of Hawaii, County of Honolulu, SS
SUBSCRIBED AND SWORN TO BEFORE ME	ON 10-24-74 1974
Signature of Notary	Notary Public, Judicial Circuit
My commission expires	Sept 15 19 75

14. ABSTRACT OF DOCUMENTARY EVIDENCE — TO BE COMPLETED BY REGISTRAR

1	Type of Document: Kapaa High & Int. School record, Kauai	Date Established: Sep. 6, 1918	
	Date of Birth or Age: February 3, 1908	Place of Birth: Kapahi, Kauai	
	Father's Name: Jose Contrades	Mother's Name: Rose Contrades	
	Type of Document: Bureau of Census record, Washington, D.C.	Date Established: Jan. 1, 1920	
2	Date of Birth or Age: 12 years	Place of Birth: Hawaii	
	Father's Name: not shown	Mother's Name: not shown	
3	Type of Document: Hawaii marriage certificate (Vol.119 #184)	Date Established: July 6, 1932	
	Date of Birth or Age: 24 years	Place of Birth: Kapaa, Kauai	
	Father's Name: Jose Contrades	Mother's Name: Manuiki Kahele	
4	Type of Document:	Date Established:	
	Date of Birth or Age:	Place of Birth:	
	Father's Name:	Mother's Name:	

15. SUPPLEMENTARY ENTRIES

16. NO PRIOR BIRTH CERTIFICATE HAS BEEN FOUND IN THE FILES OF THIS OFFICE AND THIS DELAYED BIRTH CERTIFICATE HAS BEEN ESTABLISHED IN ACCORDANCE WITH THE LAWS OF THIS STATE AND REGULATIONS OF THE STATE DEPARTMENT OF HEALTH. DOCUMENTARY EVIDENCE HAS BEEN REVIEWED WHICH SUPPORTS THE REGISTRANT'S CLAIMS REGARDING DATE AND PLACE OF BIRTH AND PARENTAGE.

17. SIGNATURE OF REGISTRAR: Walter B. Quisenberry

18. DATE ACCEPTED: OCT 25 1974

THIS CERTIFIES THAT THE ABOVE IS A TRUE AND CORRECT COPY OF THE ORIGINAL RECORD ON FILE IN THE RESEARCH AND STATISTICS OFFICE HAWAII STATE DEPARTMENT OF HEALTH

Walter B. Quisenberry
WALTER B. QUISENBERRY, M.D.
Director of Health

Date: Oct. 29, 1974

George H. Tokuyama
GEORGE H. TOKUYAMA
State Registrar

[redacted]

DEIS Comment Letter 0028

U-76

Record of Issue of License to Marry

District of Koloa County of Kauai

License Issued by [illegible] Date of License Apr 14, 19 72

Name of Male Keoki Kuapoke Age 17 (Bachelor, Widower, Divorced)

Nationality Hawaiian Residence Waipouli Kauai (2nd, 3rd, Marriage)

Name of Father Kaupuni Keopaoka Maiden Name of Mother Rebecca Kuapoke

Race Hawaiian Race Hawaiian

Birthplace of Father {State or Country} Hawaii Birthplace of Mother {State or Country} Hawaii

Name of Female Madelin K Cambrado Age 15 (Maid, Widow, Divorced)

Nationality Hawaiian Residence Kapaa Kauai (2nd, 3rd, Marriage)

Name of Father Joe K Cambrado Maiden Name of Mother Mele Paoloko

Race Hawaiian Race Hawaiian

Birthplace of Father {State or Country} Kauai Birthplace of Mother {State or Country} Hawaii

Names of Witnesses Mike Mauiki, John Kaui

Place of Marriage Kapaa Kauai

Ceremony to be Performed by

Copy sent to Registrar of Marriages this

14 day of April 19 72. (Signed) [illegible]
Agent to Grant Marriage Licenses

District of Koloa County of Kauai

Exhibit E2 / Mea E2
Page 11 of 39

114

TERRITORY OF HAWAII

RECORD OF DEATH

PLACE OF DEATH

County of Kauai

Township of Lihue
or
Village of Wailua
or
City of ..... (No. ..... Street)

If death occurs away from USUAL RESIDENCE give facts called for under "SPECIAL INFORMATION."

If death occurred in a hospital or institution give its NAME instead of street and number.

FULL NAME Kahele Papaka

N. B.—Every item of information should be carefully supplied. AGE should be stated EXACTLY. PHYSICIANS should state CAUSE OF DEATH in plain terms, that it may be properly classified. The "Special Information" for persons dying away from home should be given in every instance.

PERSONAL AND STATISTICAL PARTICULARS

Sex Female Race Hawaiian

Date of Birth February 25th 1890
(Month) (Day) (Year)

Age 21 years 10 months 25 days

Single, Married, Widowed or Divorced Single

Birthplace (State or Country) Lihue, Kauai

Name of Father James Kimo Papaka

Birthplace of Father (State or Country) Hueloa, Maui

Maiden Name of Mother Nohoanui Kapalehua

Birthplace of Mother (State or Country) Hanamaulau, Kauai

Occupation of deceased .....

The above stated personal particulars are true to the best of my knowledge and belief.

(Informant) Mrs. M. K. Papaka

(Address) Kealia Kauai

Entered Jan 22 1912 F E Brunner Registrar

Filed APR -8 1912 190 W Waterhouse Secretary, Board of Health.

MEDICAL CERTIFICATE OF DEATH

Date of Death January 20th 1912
(Month) (Day) (Year)

I HEREBY CERTIFY, That I attended deceased from ..... 19 to ..... 19 and that death occured, on the date above stated, at ..... M.

The cause of death was as follows:

died unattended probably from Pneumonia

Diagnosis made from history, symptoms and duration

Duration: ..... years ..... months 5 days

Contributory: .....

..... Duration: ..... days

(SIGNED) Dr. K. Hofman M.D.

Jan 20 1912 (Address) Kealia Kauai

SPECIAL INFORMATION only for Hospitals, Institutions, Transients, or Recent Residents.

Former or Usual Residence ..... How long at ..... place of death ..... days

Where was disease contracted, if not place of death .....

Place of Burial Wailuaoumanda Date of Burial Jan 21st 1912

Undertaker ..... Address .....

DAVID Y. IGE
GOVERNOR

KURT T. OTAGURO
COMPTROLLER

AUDREY HIDANO
DEPUTY COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Pages 32-33 of the Minute Book of Judge Hardy, volume 6, August 1897-October 1910 (2 pages), from Probate Records of the Fifth Circuit Court [Series 027 volume 8], Judiciary of Hawai'i on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 4th day of December, 2020 at Honolulu, State of Hawai'i.

ADAM JANSEN, Ph.D.
STATE ARCHIVIST
HAWAI'I STATE ARCHIVES
'IOLANI PALACE GROUNDS
HONOLULU, HAWAI'I 96813

DEIS Comment Letter 0028

1897. Circuit Court Fifth Circuit. Hawaiian Islands.

(In Probate Vol. 5.)

At Chambers.

In Probate.

In the Estate of Kapalehua deceased intestate. } Before Hardy, J.

On the hearing of the petition of Jno. Bishop Administrator de bonis non of said Estate, for first and final hearing of his accounts, approval of the same, distribution to heirs, discharge from further responsibility as Administrator, and for the release of his sureties.

Dec. 11 Petition filed December 11th 1897. Same day Ordered hearing of said petition for January 17th 1898 at 10 A.M. at the Court House Lihue, and that Notice of same be published for three successive weeks in Hawaiian in the Kuokoa Newspaper published at Honolulu, and that all persons interested in said estate do then and there appear to show cause why the said petition should not be granted.

1898. Jany 17. This day being a Government Holiday the hearing is deferred to the 18th inst. at 10 O.M. at the Court House

" 18. Court opened at 10 A.M. pursuant to Order of notice duly published and postponement of the 17th inst.

Present. Jno. Bishop Administrator. Kino husband of Nohoanu deceased daughter of Kapalehua; Kaomealani w. daughter of Kapalehua. Mekealoha w. first and of Kainuwai w. daughter of Kapalehua.

Kino, sworn;

The children of Kapalehua are Rose, Sarah, Kainuwai w. Kaomealani w. Kapalehua 2d, Mary. Nohoanu w. deceased Nohoanu married Kino. They had five children all minors. whose names are Loke m. Namuo x. Kuhelekulani w. Roselina w. Kalani x.

The Court finds that Mary, Sarah, Rose, Kapalehua 2d, Kainuwai w. and Kaomealani w. are children of Kapalehua deceased, and that Loke m. Namuo x. Kahelekulani w. Roselina w. and Kalani x. are the children of Kino x and Nohoanu his deceased wife who was the daughter of deceased. That each of his children is entitled to One Seventh (1/7) of Kapalehua's estate, and the five grandchildren above named to One Seventh (1/7) collectively.

x under age

DAVID Y. IGE
GOVERNOR

CURT T. OTAGURO
COMPTROLLER

AUDREY HIDANO
DEPUTY COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119 HONOLULU, HAWAII 96810-0119

ARCHIVES DIVISION
HAWAI'I STATE ARCHIVES
KEKĀULUOHI BUILDING, 'IOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAI'I 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Probate No. 433, Estate of KAPALEHUA (83 pages), from Probate Records of the Fifth Circuit Court [Series 027-4], Judiciary of Hawai'i

on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 16th day of April, 2021 at Honolulu, State of Hawai'i.

ADAM JANSEN, Ph.D.
STATE ARCHIVIST

DEIS Comment Letter 0028

1st Judge 1st Judicial Cir. Hawn.

In Chambers. In Probate.

Kalua Oct. 30 1890

Estate of Kapalehua
of Waihua. Kauai. deceased
Intestate.

On the hearing of the petition of Mrs. Mary Manoiki, and Mrs. Nathoanui Kino. for Letters of Administration upon said estate. pursuant to Order of Court. Sept. 30. 1889.
Petition filed Sept. 30, 1890. notice of hearing duly advertised for three successive weeks in Hawaiian. in the Kuokoa newspaper printed and published at Honolulu

Oct. 30 10 am. Appeared Mrs. Mary Manoiki, & Mrs. Nathoanui Kino. Manoiki husband of said Mary. and Kino husband of said Nathoanui — Also Mrs. Keaouli Kapaalehua. widow of said deceased. in opposition to the petition. —

also Kawahamai. step mother of Kapalehua. Also appeared Naimi. Mrs. Keaouli Kapaalehua sworn

I was first married to Salem Hanchett by Waiamau. We had one child - Mary. the petitioner but we had been divorced before She was born. When she was seven years old — when I married Kapalehua. and Mrs Kapalehua brought her up. —

Present when Kapalehua died

DEIS Comment Letter 0028

Cert ?

Hebito on the 14th of Jan. He died
unmarried. He was over 50 yrs of age
Sawhim buried at Waikiki Mauka. —
He Kapaletua & had children viz:
Kaimi ka
Mohoaui w
Sila w
Row w
Kapaletua Jr.
Kaiuwai w
Kaomealani w —
Bail Bond was on the request of
the two Keaouli Kapaletua and with
the consent of all parties present appointed
as Admr of the said Est. on his filing
a good & sufficient bond in the penal sum
of $2000. — and was on the like request
and approval appointed as Guardian of
the 4 minor children of the dec. under
the same bond. —

J. M Andy.
Cir. J.

Exhibit H1:3 /
Mea H1:3
Page 17 of 39

Oct 30

Bond filed and approved. J. W. Wilcox sworn
Letters of Administration and Letter of
Guardianship of minor heirs of Kapaletua

JOSH GREEN, M.D.
GOVERNOR
KE KIAʻĀINA

KEITH A. REGAN
COMPTROLLER
KA LUNA HOʻOMALU HANA LAULĀ

MEDIH-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HOʻOMALU HANA LAULĀ

STATE OF HAWAIʻI | KA MOKUʻĀINA O HAWAIʻI
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA ʻOIHANA LOIHELU A LAWELAWE LAULĀ
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

ARCHIVES DIVISION
HAWAIʻI STATE ARCHIVES
KEKĀULUOHI BUILDING, ʻIOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAIʻI 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Page 14 of K-26, Records of Issue of License to Marry, Records of Marriage and Marriage Licenses, Kauai, 1918-1919, pgs. 1-47 (1 page), from Hawai'i State Archives, Vital Statistics Collection [Series 223-17]

on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 7th day of April, 2023 at Honolulu, State of Hawai'i.

ADAM JANSEN, Ph.D.
STATE ARCHIVIST

DEIS Comment Letter 0028

K-26

July 8/18 14
J Mckenzie

Record of Issue of License to Marry

District of Kawaihau County of Kauai

License Issued by K Maunaga Date of License July 27/18.

Name of Male John Pahui Akina Age 56 (2nd, 3rd, Marriage) ~~Bachelor~~ ~~Widower~~ ~~Divorced~~

Nationality Hawaiian Residence Kapaa Kauai

Name of Father Akina Maiden Name of Mother Kauane

Race Hawaiian Race Hawaiian

Residence Dist of Kapaa Kauai Residence Dist of Hanalei Kauai

Name of Female Rose Kapaleku Lopez Age 47 ~~Bachelor~~ ~~Widow~~ Divorced (2nd, 3rd, Marriage)

Nationality Hawaiian Residence Kapaa Kauai

Name of Father Kapaleku Maiden Name of Mother Keaouli

Race Hawaiian Race Hawaii

Residence Dist of Waipa Residence Dist of Waipa

Names of Witnesses Chas Long, Mrs Chas Long

Place of Marriage

Ceremony Performed by

Copy sent to Registrar of Marriages this

27 day of July 1918

(Signed) K Maunaga
Agent to Grant Marriage Licenses

District of Kawaihau County of Kauai

HONOLULU STAR-BULLETIN, LTD.

PLACE OF MARRIAGE

County of Kauai
Town, Village or City of Anahola

TERRITORY OF HAWAII

RECORD OF MARRIAGE

No. 227

MALE		FEMALE	
Full name of groom	John Canui Akima	Full name of bride	Rose Kapalehua Igawa
Residence	Kapaa, Kauai	Residence	Kapaa, Kauai
Age at last birthday	51 years	Nationality	Hawaiian
Birthplace (State or Country)	Honolulu, Oahu	Birthplace (State or Country)	Kalua, Kauai
Length of residence in Territory of Hawaii	Native Born	Length of residence in Territory of Hawaii	Native Born
FATHER		**FATHER**	
Full name	Ah Kima (ch)	Full name	Kapalehua
Race	Chinese	Race	Hawaiian
Birthplace of father (State or Country)	Hong Kong, China.	Birthplace of father (State or Country)	Niihau
MOTHER		**MOTHER**	
Full maiden name	Kaanamo Kaulakahi	Full maiden name	Kepoli
Race	Hawaiian	Race	Hawaiian
Birthplace of mother (State or Country)	Kau, Hawaii	Birthplace of mother (State or Country)	Niihau

License to marry issued by: K. Matsunaga — Date of license to marry: July 29, 1918

Witnesses to marriage ceremony: Mrs. Lilly Rawlins, Miss Mary Rawlins

Entered Aug 3. 1918 J M Kaeleiwa — Registrar

Filed Aug 3 1918 — Registrar General, Territorial Board of Health

I HEREBY CERTIFY that John Canui Akima and Rose Kapalehua Igawa were joined in wedlock by me on the Sunday eighth day of July A. D. 1918 at Anahola, County of Kauai, Territory of Hawaii.

IN WITNESS WHEREOF, I have hereunto set my hand this 28th day of July A. D. 1918.

(Signed) Robert Burgess
Luna Hooks Mare

DEIS Comment Letter 0028

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA

KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEOH-LENG BLUMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

STATE OF HAWAI'I | KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ
P.O. BOX 119, HONOLULU, HAWAI 96810-0119

ARCHIVES DIVISION
HAWAI'I STATE ARCHIVES
KEKĀULUOHI BUILDING, 'IOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAI'I 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Probate No. 371 of KAUAKAHI (18 pages), from Probate Records of the Fifth Circuit Court [Series 027-3], Judiciary of Hawai'i

on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 5th day of May, 2023 at Honolulu, State of Hawai'i.

for ADAM JANSEN, Ph.D.
STATE ARCHIVIST

DEIS Comment Letter 0028

Kalekau was dec'd wife. Ariamatia her
husband. They had children
w. Ctaumm.D. & Namaniki K =
Ctaumm. m. to P Haowea.
They Had 6 children. 5 live
XV Ctaankau K. and
Ctamaniki, mar. Paalea.
had 3 chil. 1 dead & live 3 - viz
XV: XVI Kela W. Pet. & Keoulu. W 2

The 6 children above of Ctaumm and
Ctaankau. — Hooca W. — Polani W.
Kalaeamakalii W. Ctikka W.
Koalani W. -

The 3 children of Ctamaniki & Paleo
were
Ikakumu. W.
Kela W.
Keoulu - W.

Ikakumu married Ms. Opumii.
had 5 children 4 dead in infancy -
1 living Pakaua. K.

XX.

I. When I first knew dec'd he was an old
man. He was living at Waikouli -
He was then living with Kikeke. 2d wife.
Pahuai was living with them -
I lived with Ikakumu. I think full 10 yrs.
at Ctikaw. I married. Kela at Niihau

DEIS Comment Letter 0028

IL9-3

I went to live with Kalekau. took care of her. — Kalekau told me she was the sister of Leiki. She was an old woman when I married Hekuna. She was older than Leiki — Leiki was their mother.

Kaanahau " father.

They had 7 children Kalekau[w] & Leiki. They were married according to the Ancient Hawn custom. I never saw either of them. —

I first saw Leiki while McBryde was Circuit Judge, I think. I went to see him He acknowledged Keka as his grand daughter. The then went to live at Waikua and have lived there ever since — He did not go to Leiki's funeral Did not hear of his death, till afterwards.

✓ Keka[w] Pet. Divorced. Knew Kamakahi-Palakekumokn was his first wife. They had 1 child Poiekua,[k] dead. Poiekua married — Kanaha. Dec They had no children —

Leiki married 2[d] wife Kipola. They had no children — Leiki died first. Kipola is dead. — Kipola was married to another husband before she married Leiki

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adty for Pahuai – Knew Poiekua. He died-
before deft– As I remember deft died in
64 or 65. I was teaching school at Wailuo
at the time. Thick deft– will was burned
in '67– in which he bequeathed the half
his property to Kihalo and the other half to
Pahuai– I and Hali were the witnesses to
the will– Deft died of dropsy & running
ailing– ✗. Poiekua died of– paralysis–
his wife survived him. He died in 63. or 64.–
Kauhuo. Knew Poiekua. He died before deft–

Hearing continued to– July 16. 1884
at 10 A.M. – Chas. Kulua

July 16. 84– Hearing continued as per adjt. Same 15.-84
Present: Petr: attka: & Interpreter Kaumualii.
this adty Kealakuaa and Pahuai.
Petr. asks leave to introduce further testimony
No objection being made, leave was granted.
✗ For Petr: Papaha[K] sworn. Born at Kihau.
Live now at Wailuo. Have lived there 10 yrs.
Was living at Kihau when deft died. –
I was over at Wailuo before deft died.
I am a relative of deft–
Knew. saw personally the father and mother
of deft. Maaua father of deft
Meke mother of "

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They have two children.
Kelekau ᵐ 1st child.
Kanakahi 2ᵈ "

Kelekau married Kiamoha.

Their children were two.
Kuanui ᵐ. 1st
Kamaiki ᵐ. 2ᵈ.

Kuanui ᵐ married Kaawea.

They have 6 children, 4 living.

xxx 1. Kaauhau living at Waimea
2. Kahelio ᵐ. D.
3. Kaicka ᵐ. D. m.
4. Pahele ᵐ. D.
5 Kaaea ᵐ. D. m.
6. Koolani ᵐ D.

Kamaiki ᵐ m. to Paakea

3 children
1ˢᵗ Ikekuma ᵐ D. in Omaui
2 Kela w Pet ᵐ
xxx 3 Keaheli w

Ikekuma of Omaui

xxx. 1 Child. Pakaua ᵐ

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adj^t deck^s land. Poiekua's wife Kanaloa was there. But dead. P. first chief then Kanaloa. — Last was King when I went to Waikiu to live.

Q. by — Continued

Deck^s home stood on his land. Pahuai home and deck^s land. When I first went to deck^s Pahuai was living there. Heard that Pahuai was deck^s child.

~~Kitchis Palauakaka w my mother~~
~~Puka father~~
~~Kamua w mother of Palauakaka~~
~~Keaa & wife mother of Kicka~~

My mother was a sister of Kicka —
Waha x & Namua w. Parents of
Palauakeka w & Kicka w —
Palauakeka m. Kaniolama.
they had one child Pahaka. myself —

Luhi w. wit^d for 1^st^ _ sworn:

Born Kikiau lived at Kaha a
now live Lihue — Knew deck^s wife.
Lived at Kaha — 10 years. Have lived at
Lihue 5 yrs. Deck^s died while I was at Kaha.
My husband Kicka was brother in law of deck^s
was living at Deck^s when he died — in 97 —
He left Kipuka his widow. Poiekua was then

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them. He is my grandson. Thinks he was 5 or 6 yrs old when I became the foster child of deceased. Lived with H from that time till he died. My house stood on his kuleana. He never paid any taxes on the land. He did not cultivate

Several [illegible] them any little work. Knew Kalapeti. His husband is Opunui. Never saw her at deceased's. Kaumu alii made the coffin and buried Kanakahi.

Case examined.

Deft made a will. House burned when my house was burned before he died. My present house stands on the land granted to Kamakaleleani. My house that was burned stood on Kanakahi's land. The house burned belonged to Kahiwa.

// It appearing to the Court from the evidence adduced, that the heirs at law of Kanakahi, aside from the heirs of the widow Kipuka, are Kela, the petitioner, 1 Kaauhau & and Keoulio & grandchildren of Kalekau, sister of Kanakahi: and Pakaia & great grandson of said Kalekau; — and that the Contestant Pahuai has failed to show that he was adopted by Kanakahi as his heir // It is therefore

This cover sheet is for the certified copies of

Royal Patent: _____

Land Commission Award: _____

Grant: 2944

Total Pages: 3 (Including This Page)

I hereby certify that the foregoing document is a true and correct copy of the document archived on film in the Department of Land and Natural Resources, Kalanimoku Building, 1151 Punchbowl Street, Honolulu, Hawaii.

Dated: Honolulu, Hawaii, this 22ND day of

AUGUST, 2023

Registrar, Bureau of Conveyances
Department of Land and Natural Resources

DEIS Comment Letter 0028

No. 3944

ROYAL PATENT.

KAMEHAMEHA IV. By the grace of God, King of the Hawaiian Islands, to all Men Royal Greeting.

Know ye, that We, for Ourself and Our successors in office, do grant and give, absolutely, unto Messrs. Rutherford Buchanan and Francis Buchanan of Honolulu, Oahu, for the consideration of

Two Thousand Dollars paid into the Royal Exchequer,

the whole of the lands now belonging to the Government on the Island of Niihau; it being understood, that under this Patent the whole of the land on the said Island of Niihau is conveyed to the said Messrs. Rutherford Buchanan and Francis Buchanan, with the exception of the two lands known as Kahuku and Kelawela, set off to Kamaiki in the Great Division of 1848, and that piece of land set apart for Church and School lots; and also excepting and reserving to the Hawaiian Government, all Mineral and Metallic Mines of every description.

To have and to hold the above granted lands in Fee Simple unto the said Messrs. Rutherford Buchanan and Francis Buchanan, their heirs and assigns for ever, as Tenants in Common, subject to the taxes to be from time to time, imposed by the Legislative Council, equally upon all Landed Property held in Fee Simple.

In witness whereof, I have hereunto set my hand and caused the Great Seal of the Hawaiian Islands to be affixed at Honolulu this 27th day of January A.D. 1864

Kamehameha R.

By the King

G. Pelekuno

By the King and Privy Council

G. Pelekuno

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Containing Acres, more or less;
excepting and reserving to the Hawaiian Government, all mineral or metallic Mines of every description.

To have and to hold the above granted Land in Fee Simple, unto the said
Heirs and Assigns forever, subject to the taxes to be from time to
time imposed by the Legislative Council equally, upon all landed Property held in Fee Simple.

In Witness Whereof, I have hereunto set my Hand, and caused the Great Seal of the
Hawaiian Islands to be affixed, at Honolulu, this
day of 18

This cover sheet is for the certified copies of

Royal Patent: _____

Land Commission Award: _____

Grant: 1615

Total Pages: 3 (Including This Page)

I hereby certify that the foregoing document is a true and correct copy of the document archived on film in the Department of Land and Natural Resources, Kalanimoku Building, 1151 Punchbowl Street, Honolulu, Hawaii.

Dated: Honolulu, Hawaii, this 22ND day of AUGUST, 2023

Registrar, Bureau of Conveyances
Department of Land and Natural Resources

DEIS Comment Letter 0028

HELU

PALAPALA SILA NUI

Mā kuia Pālapala Sila Nui ka hoike aku aū o Kauwhanoa III , ke Alii noho ka Akau i kona kikowaena aloha
(hoomoku ai nohona o ka Hawaii) Pae Aina, i ua kauoha a pau i kuia ia, mamua ona o ka lawe ana kapae Alii,
no kuwi lilo ka aina ilalo o ka aupuni
i kona
pau a waiho ia ma
ma ka Moku pui o

: o pono kai ka waiho ana a ua Mokupuni :

Ohomaka ma Kakahiai i ka Mahi Kuua
o Kua a ahole ona ka pepehi ana a pau
i Kua ma ka ana o ka poe i pepehi ia e
Kauk. Apr 'K. 1st Kauk. Apr 'K. 2d Kauk. Apr
K. 3d Kauk. Apr 'K. 4th Kauk. Apr 'K. 5th Kauk.
Apr 'K. 6th Kauk. Apr 'K. 7th Kauk. Apr 'K. 8th Kauk.
Apr 'K. 9th Kauk. Apr 'K. 10th Kauk. Apr 'K. 11th
Kauk. Apr 'K. 12th Kauk. Apr 'K. 13th Kauk. Apr 'K.
14th Kauk. Apr 'K. 15th Kauk. Apr 'K. 16th Kauk. Apr
Lilo i Kakahiai ma ka Mahi Akua o Kuia Kauk.
a hele ana ma Kakahiai a ka hoomakaukau ana

Aka ka Kahua, ka Kahapula ma ka Kahe
Kula. a me ke Kapa pa ana Kahiapaoa mai
ai ka waa a ua ua Kakaua i ua Kauaka

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a malo'o o ia Ajana Kamalima eka a oi iki aku emi iki mai paha.
Eia ke kumu o ka lilo ana; ua hoawi mai na iloko o ka waihona waiwai o ke Aupuni i na dala
he $12.50
Aka, ua koe i ke Aupuni na mina minerals a me na mine metala a pau.
No Pukapuka
ua aina la i hoawiia, no na mau loa aku no, ma ke ano alodio a no ko na mau hoohana, a me ko na waihona, ua pili nae ka aohoe a ka Poe Ahaolelo e kau like ai ma na ano alodio a pau i kela manawa i keia manawa.

A i mo e ikea'i, ua kau wau i ku'u inoa, a me ka Sila Nui o ko Hawaii Pae Aina, ma Honolulu, i keia la 20 o Pepeluali, 1895.

Kamehameha IV
Iona ʻ
D K Kaahumanu
Kuini Dowa

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA

KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEOH-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

STATE OF HAWAI'I | KA MOKU'ĀINA O HAWAI'I
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

ARCHIVES DIVISION
HAWAI'I STATE ARCHIVES
KEKĀULUOHI BUILDING, IOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAI'I 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Survey Notes for Royal Patent Grant No. 1615, to PAPAPA & OTHERS, Omaumalua & Kamalino, Niihau (8 pages), from Grant Survey Notes [Series 526-16], [Commissioner of Public Lands] Department of Land and Natural Resources

on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 8th day of April, 2024 at Honolulu, State of Hawai'i.

for ADAM JANSEN, Ph.D.
STATE ARCHIVIST

ROYAL PATENT GRANT NO. 1615

PAPAPA & OTHERS

Omaumalua & Kamalino, Niihau

DEIS Comment Letter 0028

Honolulu
Oct. 16th 1854

To His Highness John Young,
Minister of the Interior &c &c

Sir;

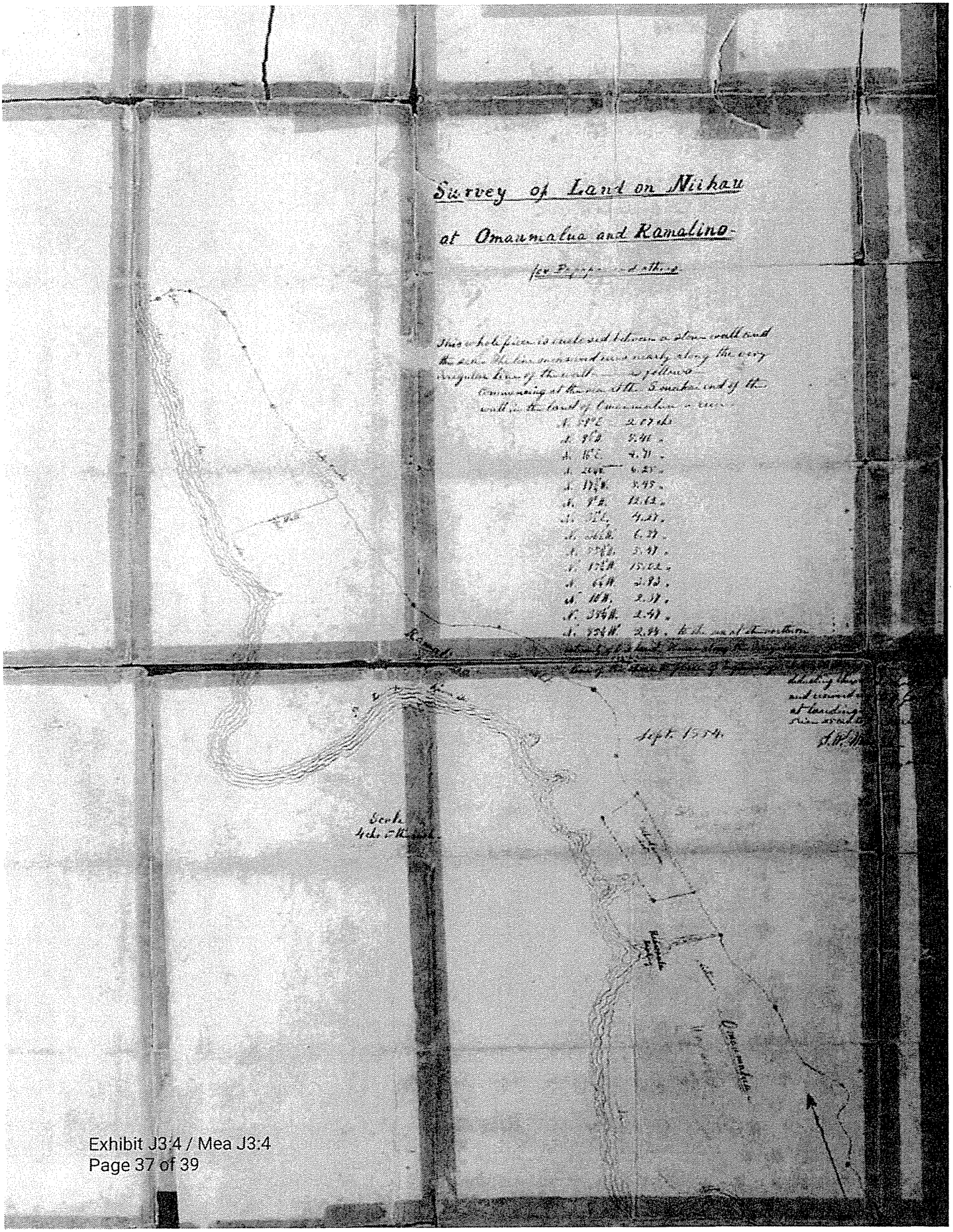
I have the honor to enclose herewith a survey of fifty acres of land at Omaumalua and Kamalino on the Island of Hilo. The land is poor and was sold at 25 cents per acre. The Patent is to be made out to Papapa. Please find herewith the money for land & Patent less my commission on the sale.

Respectfully
Your ob't serv't
S. W. Marsh
Dy't and Surv.r

12.50
2.50
16.50
3.30
13.20

3.30

1.65



Survey of Land on Niihau

at Omaumalua and Ramalino-

for Purposes and there

This whole piece is rocky and broken & stony wall and the [illegible] runs nearly along the very irregular line of the wall — as follows —

Commencing at the [illegible] S.E. Southern end of the wall in the land of Omaumalua a corner

N. 58° E. 2.67 chs
N. 8° E. 5.46 "
N. 16° E. 4.71 "
N. 20° E. 6.20 "
N. 17½ W. 3.45 "
N. 7° E. 12.62 "
N. 12° E. 4.47 "
N. 26° E. 6.32 "
N. 7½° E. 5.47 "
N. 12° W. 15.62 "
N. 66° W. 2.83 "
N. 18° W. 2.37 "
N. 35° W. 2.47 "
N. 72° W. 2.44 "

Ramalino

Sept 1874

Scale 4 chs = 1 Inch

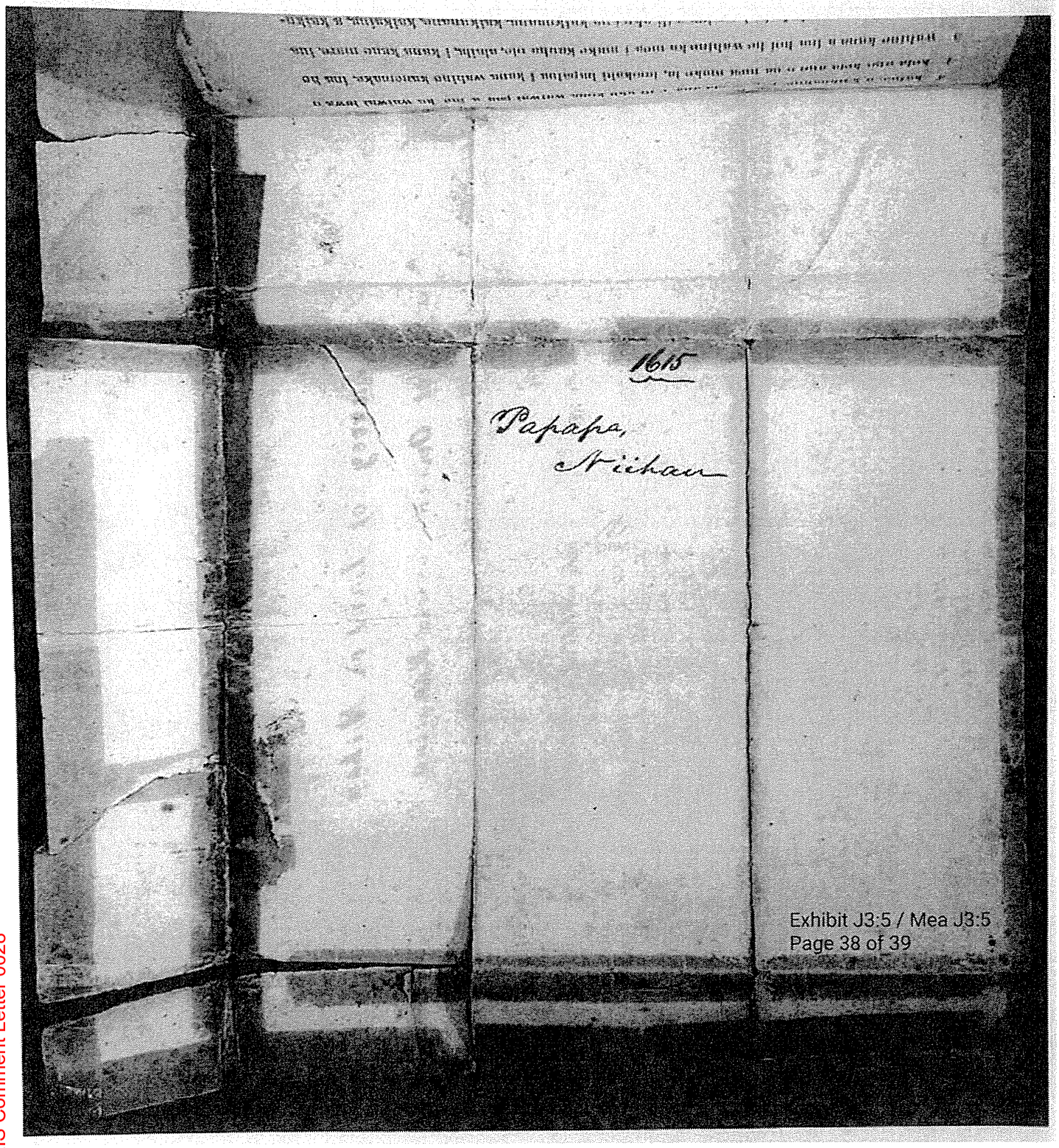


Exhibit J3:5 / Mea J3:5
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A KAIKU...

E hookoloia e ka Moi a me ka Lala...

Ahaolelo Kau Kanawai o ke Aupuni.

PAUKU 1. Ina e make kekahi kane a wahine paha iloko o...

ole, aole ana keiki, aole makuakane, aole makuahine, aole kaiku..., kaikunane, kai-
kaina, a kaikuahine paha e ola ana, e ili aku kona waiwai pau a me ka waiwai lewa o
kela ano keia ano o na mea make la, hookahi hapalua i kana wahine kanemake, ina he
wahine kana a ina hoi he wahine ka mea i make kauha ole, alaila, i kana kane mare, ina
he kane kana, a o kekahi hapalua e ili aku i na kaikuaana, kaikunane, kaikaina, a kaiku-
ahine paha o ka makuakane a me ka makuahine o ka mea make kauoha ole, a i ko la-
kou mau keiki a me na hooilina o lakou i komo iloko lakou wahi, a ina aole kekahi o ia
poe i hai ia maluna e ola ana i ka wa i make ai na mea make la, alaila e ili aku ka
waiwai a e mahele like ia i na hanauna pili koko like, aole nae e loaa ka mahele o ia
waiwai i na poe pani hakuhaka ma kahi o na hanauna pili i hala e i ka make; a ina
aole he wahine kane make, a kane mare paha a ka mea make kauoha ole, alaila e ili
aku kona waiwai a pau i na poe hooilina la a me na pili koko ona: aka nae, ina na loaa
ia ia ka waiwai ma o kekahi makua ona, alaila e oi ke kuleana o na kaikuaana, kaiku-
nane, kaikaina a kaikuahine paha o na makua la, mamua o ko na mea e ae.

Ina he wahine mare ka ka mea make kauoha ole, aole nae ona hoahanau i koe i ka
wa i make ai, he wahine kane make wale no, alaila e ili aku kona waiwai a pau i kana
wahine; a ina hoi he wahine ka mea make kauoha ole, aole ona hoahanau i koe, he
kane mare wale no, alaila e ili ana kona waiwai a pau i ke kane.

PAUKU 2. O na kanawai a me na hapa kanawai a pau i kue i keia kanawai, ma keia
na hoopau ia no.

Exhibit 3

DEIS Comment Letter 0028

DEPARTMENT OF THE NAVY
PACIFIC MISSILE RANGE FACILITY
P.O. Box 128
KEKAHA, HAWAII 96752-0128

11000
Ser N4F/0126

Ms. Dawn Chang
State Historic Preservation Officer
DLNR Main Office
Kalanimoku Building
1151 Punchbowl St.
Honolulu, HI 96813

SUBJECT: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA'I, HAWAI'I (HICRIS Project No. 2024PR01077)

Dear Ms. Chang:

In furtherance of the Navy's efforts to evaluate historic properties on Ka'ula Island and as discussed in the November 08, 2024 letter (Enclosure 1), this letter updates you on the steps taken to gather additional information from Native Hawaiian Organizations (NHOs) and interested parties on the potential presence of Traditional Cultural Places (TCPs) on Ka'ula Island. Since November 2024, the Navy has conducted multiple meetings with interested parties, many of whom are NHOs. The Navy shared information about prior surveys of Ka'ula Island, conducted additional information gathering and research, and engaged with NHOs to gather input regarding traditional knowledge and cultural practices pertaining to Ka'ula Island.

Consistent with Stipulation VII.C of the 2012 PA (Reference 1), the Navy applied the National Register Criteria (36 C.F.R. § 60.4), and determined that Ka'ula Island meets the criteria of a Traditional Cultural Place eligible for listing under National Register Criterion A (Events) as an association with "events that have made a significant contribution to the broad patterns of [Native Hawaiian] history." Ka'ula Island is also eligible for inclusion in the National Register of Historic Places (NRHP) under Criteria B (Persons) for its association with the lives of significant persons (i.e., ancestors, mythical figures) and D (Information Potential) for its potential to provide information about Hawai'i's historical past.

IDENTIFICATION OF HISTORIC PROPERTIES

Ka'ula Island is on the earliest maps of Hawai'i and referenced in many traditional Hawaiian texts. The island is a crescent-shaped islet approximately 22 miles southwest of Ni'ihau (Figure 1). The 113-acre island is about 1.5 km long and 100-300 m wide and the highest point on the island is near the center. The island has steep sea cliffs on its sides and the rough seas and rocky shorelines make it hard to reach by boat.

A limited number of archaeological studies have taken place on Ka'ula Island due to its remote location and difficulty to access by vessel or by air. The Navy submitted these studies to SHPD via HICRIS. Dr. Robert Hommon of the State Parks Historic Sites Division of the DLNR conducted the earliest survey of Ka'ula Island in 1976 (Reference 2). Dr. Hommon identified four sites on the island, including a cave, low mounds, a terraced platform, and a lighthouse

foundation. Two sites were located on the northern end of the island and two sites were near or on the summit (at center of island).

The Navy conducted a pedestrian survey of accessible areas of the island in 1999 (Reference 3). This survey identified six archaeological sites, five located on the northern end of the island and one on the summit. Please see a summary of the sites and the associated findings in Table 1 below. The Navy observed three of the sites identified by Dr. Hommon. The cave site recorded by Hommon was not found, and the portion of the cliff where the cave was located showed evidence of collapse due to erosion. Neither survey (1976, 1999) identified archaeological sites at the southern end of the island.

In 2004, the Navy conducted a study to identify potential TCPs on Ka'ula Island. The study relied on historical accounts, traditional Hawaiian texts, historical maps, ethnographic reports, and interviews with Hawaiian community members (Reference 4). The study identified three places as potential TCPs: (1) Ka'ula Island, (2) Keanaokū (also called Kūhaimoana), a cave recognized as home to a shark god, and (3) Kahālauloa, a heiau (sacred Hawaiian temple). Recent engagement with NHOs corroborates many of the findings in the 2004 TCP report.

Table 1: Summary of Archaeological Sites on Ka'ula Island

Site number	**Site Feature(s)**	**Site Types**	**Probable Functions**
50-70-99-01	Concrete foundation, historic materials	Historic era	Former U.S. Coast Guard lighthouse, 1932-1948
50-70-99-02	Terrace, stone rubble walls, modified cave, artifacts related to stone production (core and hammerstone), and branch coral	Hawaiian	Short-term habitation and/or used for ceremonial functions
50-70-99-03	Mound and two circular enclosures associated with short-term habitation; modern materials	Hawaiian; Historic era	Short-term habitation and/or used for ceremonial functions, and historic shelter
50-70-99-04	Two mounds and a rectangular-shape depression; modern materials	Hawaiian; Historic era	Possible remnant of Hawaiian structure, location appears to correlate with heiau on 1923 photograph (Reference 3: Figure 9)
50-70-99-05	Mound	Unknown	Lacked sufficient integrity for an interpretation of function and cultural affiliation
50-70-99-06	Cave with traditional Hawaiian octopus lure sinker preform made from locally	Hawaiian; Historic era	Utilized as a shelter and short-term habitation

	sourced olivine nodule; modern materials		

ENGAGEMENT WITH NATIVE HAWAIIAN ORGANIZATIONS

In accordance with Section VII.C. of the 2012 PA, the Navy is considering input from NHOs regarding additional historic properties on Kaʻula Island and has contacted NHOs, the Office of Hawaiian Affairs, and members of the academic community that may be able to share information about the historic and cultural significance of Kaʻula Island (Table 2). The Navy also invited NHOs to submit information in writing, if preferable.

A shared belief expressed by participating NHOs is that Kaʻula Island is a cultural resource, and the island is part of a landscape/seascape that is alive for the Hawaiian people. The island represents a familial connection to Hawaiians based on genealogical ties to the living environment. This connection is important because Native Hawaiians believe they must care for the island in similar fashion as they would care for their relatives. Kānaka Maoli, a term used to describe the native people of Hawaiʻi, have a reverential relationship with the living Earth. The cultural perspective of mālama ʻāina and aloha ʻāina, to care for the land and nature with sincere love and respect, is at the heart of Kānaka Maoli cultural traditions and customary practices.

According to Hawaiian tradition, Kaʻula Island is associated with cultural traditions related to the direction west, sunset, winter solstice, the deities Pele, Kūhaimoana, Kāne, and Kanaloa, aliʻi (chief, nobility), fishing, navigation, migration, wind, transition, and symbolic associations of life and death.

The Native Hawaiian community knows Kaʻula Island as the location of Keanaokū, the cave of Kūhaimoana. This shark akua (god) or ʻaumakua (deified ancestor) is the traditional guardian of the waters of Kaʻula and Niʻihau. A large sea cave on the northwest side of Kaʻula Island is a key feature noted in interviews and historical accounts. NHOs also identify the presence of heiau on Kaʻula Island connected to the shark god. Some NHOs recognize that in the past three heiau were present nearby at a higher elevation east of the sea cave. The heiau Kahālauloa is likely the place Ka-hālau-a-Ola mentioned in several songs and chants and associated with the concept of revitalized life. Other heiau names include Kaneneʻeneʻe, Pahoku-pio, and Ka-unu. NHOs note the heiau and sea cave are places to perform cultural protocols.

Native Hawaiians have had a long-standing interaction with Kaʻula Island's natural environment. Participating NHOs recognize the island as a traditional place for intermittently collecting birds and feathers as well as olivine stone for fishing. Feathers collected from Kaʻula included those from the koaʻeʻula or red-tailed tropicbird. These feathers are considered special and were used in regalia. Native Hawaiians believe the island habitat serves as a nursery for birds, ensuring bird populations have a location to recover if needed. Birds from the island are essential because they help those fishing locate game fish in the area. NHOs maintain that natural resources on and around the island were vital support for the migration to and settlement of the Hawaiian Islands.

The NHOs recognize the absence of human impact or presence on the island as indicative of the place's importance as wahi pana (sacred place). The more revered the location, the less traveled. Participating NHOs note visits to Kaʻula Island by members of the Hawaiian monarchy including Liholiho, Kalākaua, and Kapiʻolani. Some NHOs express strong interest in visiting Kaʻula Island to perform cultural protocols. Others expressed a desire to visit the island by ship only, being mindful to not contaminate the island or introduce invasive species.

The participating NHOs note Kaʻula Island is present in many Native Hawaiian mele (songs) and oli (chants). The island is often referred to in regards to vitality and life. Mele and oli also reference a canoe landing and two stone guardians on Kaʻula Island. In one chant, Kaʻula Island is referred to as "the house of wind." Some NHOs believe the island has a connection to the wind and its unpredictability.

Table 2: Native Hawaiian Contacts and Organizations

Contacts	**Organization/Association**
C. Kunane Aipoalani	Na ʻOhana Papa O Mānā
E. Kalani Flores	Flores-Case ʻOhana
Kamakana Ferreira	Office of Hawaiian Affairs
Kawaikapuokalani Hewett	Loea, Kumu Hula
Kekuewa Kikiloi	Nohopapa Hawaiʻi
Peleke Flores	Kiaʻi Kanaloa
Pelika Andrade	Nā Maka Onaona
Richard Keaoopuaokalani NeSmith	Researcher and Consultant
Robinson family	Niʻihau
Terrill James Kane Alii Williams	ʻOhana of Papapa of Niʻihau
Walter Ritte	ʻĀina Momona

DETERMINATION OF ELIGIBILITY

A traditional cultural place is defined as a building, structure, object, site, or district that may be eligible for inclusion in the NRHP for its significance to a living community because of its association with cultural beliefs, customs, or practices that are rooted in the community's history and that are important in maintaining the community's cultural identity (Ref. 5). Based on information provided by NHOs as well as archival, historical, and ethnographic research, the Navy has determined that Kaʻula Island is a site traditionally recognized as significant to Native Hawaiians because of its association with cultural beliefs, practices, and values. Native Hawaiian views related to Kaʻula Island are widely shared within the community and have been passed down through generations, thus serving an important role in maintaining the group's cultural identity.

While the Navy recognizes changes have taken place from historic activities, including lighthouse construction and military training activities, Kaʻula Island retains its integrity of location, setting, feeling, and association. The applicable National Register area of significance is Ethnic Heritage-Pacific Islander, Native Hawaiian. Kaʻula Island is historically important at the state level of significance with a period of significance from circa 1870 to present.

As mentioned above, the Navy has determined that Kaʻula Island meets the essential characteristics of a TCP eligible for inclusion in the National Register (Reference 5). The Navy makes this assessment based on an understanding of the significance of Kaʻula Island as well as the physical and nonphysical aspects that characterize and convey the perspective of the Native Hawaiian community. Notably, the island itself possesses historical and cultural significance. Below is a list of character-defining features of Kaʻula Island with supporting information.

1. The island itself is associated with significant cultural traditions and events in Hawaiian history:
    - Kaʻula Island is a natural feature connected to the direction west, sunset, the deities Pele, Kūhaimoana, Kāne, and Kanaloa, aliʻi, navigation, the wind, astronomy, transition, creation, and symbolic associations of life and death. Kaʻula is also part of Hawaiian astronomical architecture, and together with Niʻihau forms a winter solstice sightline from Kaunalewa Ridge on Kauaʻi;
    - The importance of Kaʻula Island as wahi pana is conveyed in creation stories, cosmology, and Native Hawaiian traditions of oli and mele. For NHOs, Kaʻula Island's physical location make it one of the older islands in the Hawaiian chain. Understood as a child of Papahānaumoku and Wākea, its origin, age, and genealogical ties to Native Hawaiians are a source of reverence; and
    - Native Hawaiians identify the island as essential to past traditional practice of collecting birds and feathers in addition to current practice of fishing in the waters surrounding Kaʻula Island and Niʻihau. NHOs note koaʻeʻula, or red-tailed tropicbirds, are specifically associated with Kaʻula and they identified birds of Kaʻula as a potential food supply and source for production of chiefly items, like ahuʻula (feather cape) or kāhili (feather standard).
2. Keanaokū, sea cave:
    - Home to the shark deity Kūhaimoana and an important place to perform cultural protocols.
3. Heiau (Kahālauloa, Kaneneʻeneʻe, Pahoku-pio, and Ka-unu):
    - Connected to historical traditions, including navigation, migration, and settlement throughout the archipelago and Pacific;
    - Likely the place Ka-hālau-a-Ola in songs and chants and associated with the concept of revitalized life; and
    - Ethnographically associated with paying tribute to Kūhaimoana.

In consideration of the information provided above, and in accordance with Section VII.C. of the 2012 PA, Navy is now seeking concurrence from SHPO on this National Register eligibility determination of Kaʻula Island as a TCP for Section 106 purposes. The Navy respectfully requests SHPO's reply within 30 days of receipt or sooner. The Navy is also sending this letter to the above listed NHOs for comments on the TCP eligibility determination. The point of contact for this undertaking is PMRF Cultural Resources Manager, Ms. Tara del Fierro, at tara.m.delfierro.civ@us.navy.mil.

Sincerely,

Subj: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA‘I, HAWAI‘I

B. A. STEVENSON
Captain, U.S. Navy
Commanding Officer

Copy to: Jessica Puff, State Historic Preservation Division
Susan Lebo, Ph.D., State Historic Preservation Division
Dan McNair, U.S. Pacific Fleet (N465), Environmental Readiness
William Manley, Navy Region Hawai‘i Environmental Director
Kamakana Ferreria, Office of Hawaiian Affairs Lead Compliance Specialist

Reference 1: Programmatic Agreement among Commander, Navy Region Hawai‘i, the Advisory Council on Historic Preservation and the Hawai‘i State Historic Preservation Officer regarding Navy Undertakings in Hawai‘i. 2012.

Reference 2: *Field notes from Ka‘ula Island*. Historic Sites Section, State Historic Preservation Division. Hommon, 1976.

Reference 3: *Final Report Archaeological Survey of Ka‘ula Island*. Prepared by Ogden Environmental and Energy Services Co., Inc. for Department of the Navy Pacific Division Naval Facilities Engineering Command Pearl Harbor, Hawai‘i. Robins and Anderson, 2001.

Reference 4: *Final Report Ka‘ula Island, Hawai‘i: A Study of Potential Native Hawaiian Traditional Cultural Places*. Prepared by International Archaeological Research Institute, Inc. for Department of the Navy Pacific Division Naval Facilities Engineering Command Pearl Harbor, Hawai‘i Tuggle, 2004.

Reference 5: *National Register Bulletin: Identifying, Evaluating, and Documenting Traditional Cultural Places*. Update to National Register Bulletin 38. Issued by the National Register of Historic Places and National Historic Landmarks Program. National Park Service, U.S. Department of the Interior, 2024.

Subj: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA‘I, HAWAI‘I

Figure 1: Map of Ka‘ula Island Traditional Cultural Place

Exhibit 4

DEIS Comment Letter 0028

DEPARTMENT OF THE NAVY
PACIFIC MISSILE RANGE FACILITY
P.O. Box 128
KEKAHA, HAWAII 96752-0128

11000
Ser N4F/0370

Ms. Dawn Chang
Chairperson, Department of Land and Natural Resources
State Historic Preservation Division
Department of Land and Natural Resources
Kalanimoku Building
1151 Punchbowl Street
Honolulu, Hawai‘i 96813

SUBJECT: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA‘I, HAWAI‘I (HICRIS Project No. 2024PR01077)

Dear Ms. Chang:

The purpose of this letter is to provide an update on the Navy's continuing efforts to meet its responsibilities pursuant to Section 106 of the National Historic Preservation Act (NHPA) for the subject undertaking in accordance with the Navy's 2012 PA, as amended in 2024 (Reference 1) (hereinafter "2012 PA"). This letter provides the State Historic Preservation Officer (SHPO) with an opportunity to review the proposed area of potential effect (APE) and finding of effect for proposed activities on Ka‘ula Island. As discussed in the letter dated February 26, 2025 (Reference 2), the Navy determined Ka‘ula Island meets the criteria of a Traditional Cultural Place (TCP) eligible for listing in the National Register of Historic Places (NRHP) (hereinafter "Ka‘ula Island TCP"). The Navy has received no official response from the SHPO to the determination of eligibility and no objections from any other consulting parties. As the 30-day review period has now closed, the Navy accepts the absence of SHPO response as concurrence with the determination.

The proposed undertaking includes training and testing activities conducted within established ranges at Pacific Missile Range Facility (PMRF) and at Ka‘ula Island. The type of activities is consistent with current use. Increases in training and testing activities are included; however, no new types of training and testing activities and no new training areas are proposed. Specific to Ka‘ula Island, proposed training would occur within the existing 10-acre inert impact area on the southern end of the island. The proposed undertaking may increase the number of annual air-to-ground gunnery exercises and air-to-ground bombing exercises from the Navy's historical average of 6 to a maximum of 24 and from 7 to a maximum of 31, respectively. Ka‘ula Island serves as a contingency air-to-ground area for the Navy deploying units that may need to complete required training qualifications in Hawai‘i. The proposed increased use of Ka‘ula for training provides Air Force, Army, and Marine Corps the required expanded capability to train in a maritime environment; and this location offers local units an opportunity they have not had in the past.

Subj: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUAʻI, HAWAIʻI

AREA OF POTENTIAL EFFECT

Kaʻula Island is a crescent-shaped islet approximately 22 miles southwest of Niʻihau. The 113-acre-island is about 1.5 km long and 0.1-0.3 km wide, and the highest point on the island is near the center. Training activities are limited to the 10-acre inert impact area located on the southern end of the island. In consultation with your office and Native Hawaiian stakeholders, the Navy has determined the island is a TCP eligible for listing in the NRHP due to its association with significant cultural traditions and events in Hawaiian history. Therefore, the Navy proposes the entire island comprises the APE for the purposes of this consultation (Figure 1). In compliance with Stipulation VI of the 2012 PA, the Navy requests SHPO's review of the proposed APE for proposed training activities on Kaʻula Island.

ENGAGEMENT WITH NATIVE HAWAIIAN ORGANIZATIONS

As part of ongoing engagement efforts pursuant to the 2012 PA, the Navy met with Native Hawaiian Organizations (NHOs), including the Office of Hawaiian Affairs, to seek input on the potential effects of proposed training to the Kaʻula Island TCP. In addition to the information that was shared during the meetings, the Navy also invited NHOs to submit information in writing. The Navy's proposed finding of effect considers the input and views expressed by NHOs participating throughout the Navy's Section 106 consultation engagement efforts. A summary of NHO input is included in Enclosure 1.

FINDING OF EFFECT

In accordance with Section IX of the 2012 PA, the Navy completed a review to determine whether the proposed undertaking has the potential to cause effects to the Kaʻula Island TCP. The review focused on potential effects caused by proposed activities to the TCP's three character-defining features: the physical island itself, the sea cave, and heiau (sacred Hawaiian temple). Kaʻula Island is associated with significant cultural traditions, practices, and events in Hawaiian history. The sea cave Keanaokū is home to the shark deity Kūhaimoana and an important place to perform cultural protocols and practices. The large sea cave is on the upper northwest side of the island. Heiau on the island, generally, are connected to historical traditions, including navigation, migration, and settlement throughout the archipelago and Pacific. As many as three heiau are identified in reports, historical accounts, and recent meetings, all are described as being on the northern side of the island (Reference 3; Reference 4). Consistent with past training activities, future training is limited to the 10-acre inert impact area on the southern end of the island.

Per 36 C.F.R. § 800.5(a)(1), an adverse effect is found when an undertaking may 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. The aspects of integrity contributing to the eligibility of Kaʻula Island are location, setting, feeling, and association.

Potential effects to the sea cave and heiau would be avoided because these features are on the island's northern side, well outside the area where proposed training activities would take

place. Since the proposed undertaking includes no new areas or new types of training activities, no direct or indirect effects are expected to impact the northern side of the island where the sea cave and heiau exist. Thus, the proposed undertaking will not alter these character-defining features allowing them to retain their integrity of location, setting, feeling, and association.

The review also focuses on potential effects on the island itself. Specifically, the impacts to natural or physical features of the island and its associated cultural traditions are key interest areas raised by the consulting parties that warrant investigation. To assess the potential for physical damage to Ka‘ula Island, the Navy reviewed reports and high-resolution aerial photography of the island with a detailed inspection of the inert impact area. Photographs show remnants of inert munitions largely resting on the ground surface with a small number embedded into the ground because an inert round fired does not have the same percussive impact of an explosive round. Cratering or significant physical disturbances to the ground surface from the impacts are not detectable in the aerial views. The analysis suggests that use of inert ordnance results in minimal physical damage to the island, thus having no adverse effects on this aspect of Ka‘ula Island’s integrity.

Another potential effect includes the introduction of visual, atmospheric, or audible elements that could diminish the integrity of the historic property. Although audible elements are expected to occur during proposed training, these sounds would be brief and temporary and would not rise to the level of adverse effect. Visual and atmospheric elements introduced during proposed training on Ka‘ula Island include debris from inert munitions. As cleanup of inert munitions is not part of proposed activities, the accumulation of inert munitions debris affects aspects of integrity such as setting and feeling of the island. Setting is the physical environment of the TCP and refers to the character of the place in which the property played its historical role. Ka‘ula Island is regarded by participating NHOs as wahi pana, a sacred place celebrated and storied in the cultural traditions of Hawai‘i. The island is noted for its sacred and remote landscape as well as natural resources traditionally utilized by Native Hawaiians such as birds, their eggs and feathers, and olivine stones used to make fishing lures. The expended munitions remaining on the island is not congruent with the basic physical conditions understood historically as a revered landscape. Feeling is a nonphysical aspect of integrity that is a place’s expression of the aesthetic or historic sense of a particular period. Participating NHOs regard Ka‘ula Island as a family member, and the presence of physical and natural features, collectively, reflect Native Hawaiians’ spiritual values and genealogical ties. Our review of potential effects, along with consideration of NHO perspectives, indicates that the proposed increase in activities will introduce additional visual and atmospheric elements that diminish the integrity of setting and feeling and will adversely affect the Ka‘ula Island TCP.

Lastly, the Navy’s review identified change in access to the Ka‘ula Island TCP as a potential adverse effect. NHOs express a fundamental desire to visit the island to safely resume traditional practices at the TCP. They would achieve this by performing cultural protocols, confirming interpretations of archaeological sites from NHO viewpoints, observing heiau, collecting feathers, and conducting traditional practices as documented in mele (songs) and oli (chants). While NHOs may not have had physical access to the island in recent years (limiting or negating cultural practices), they maintain their cultural traditions associated with Ka‘ula Island

and continue to value the island as a TCP. In accordance with 36 C.F.R. § 800.5(a)(2)(iv), adverse effects on historic properties may include a change of the character of the property's historic use or of physical features within the property's setting that contribute to its historic significance. Further limiting NHO access to the island will adversely affect the Ka‘ula Island TCP.

In accordance with Section VI of the 2012 PA, the Navy is now seeking concurrence from SHPO on this determination of the APE for Section 106 purposes. Further, the Navy requests SHPO promptly provide any advice or comment that it has regarding the findings of effect as detailed above. We plan to initiate consultation to resolve the adverse effects in accordance with Stipulation IX.C.1 of the 2012 PA and 36 C.F.R. § 800.6. The Navy respectfully requests SHPO's reply within 30 days of receipt. The Navy is also sending this letter to NHOs for comments on the finding of effect. The point of contact for this undertaking is PMRF Cultural Resources Manager, Ms. Tara del Fierro, at tara.m.delfierro.civ@us.navy.mil.

Sincerely,

B. A. STEVENSON
Captain, U.S. Navy
Commanding Officer

Copy to: Jessica Puff, State Historic Preservation Division
Susan Lebo, Ph.D., State Historic Preservation Division
Dan McNair, U.S. Pacific Fleet (N465), Environmental Readiness
William Manley, Navy Region Hawai‘i Environmental Director
Kamakana Ferreira, Office of Hawaiian Affairs Compliance Archaeologist
C. Kunane Aipoalani, Na ‘Ohana Papa O Mānā
E. Kalani Flores, Flores-Case ‘Ohana
Kawaikapuokalani Hewett, Loea, Kumu Hula, Direct Descendant of Kūhaimoana
Kekuewa Kikiloi, Nohopapa Hawai‘i
Peleke Flores, Kia‘i Kanaloa
Pelika Andrade, Nā Maka Onaona
Richard Keaoopuaokalani NeSmith, Researcher and Consultant
Robinson Family, Ni‘ihau
Kane Alii Williams, ‘Ohana of Papapa of Ni‘ihau, Direct Descendant of Kūhaimoana
Walter Ritte, ‘Āina Momona

Reference 1: Programmatic Agreement among Commander, Navy Region Hawai‘i, the Advisory Council on Historic Preservation and the Hawai‘i State Historic Preservation Officer regarding Navy Undertakings in Hawai‘i. 2012, as amended in 2024.

Reference 2: Navy's determination of eligibility letter to SHPD, February 2025.

Subj: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA‘I, HAWAI‘I

Reference 3: *Final Report Archaeological Survey of Ka‘ula Island*. Prepared by Ogden Environmental and Energy Services Co., Inc. for Department of the Navy Pacific Division Naval Facilities Engineering Command Pearl Harbor, Hawai‘i. Robins and Anderson, 2001.

Reference 4: Niihau: The Traditions of an Hawaiian Island. Mutual Publishing, Honolulu. Tava and Keale, 1989.

Subj: LAND-BASED TRAINING AND TESTING AT THE PACIFIC MISSILE RANGE FACILITY (PMRF), KAUA‘I, HAWAI‘I

Figure 1: Map of Area of Potential Effect

DEIS Comment Letter 0029

Mai Hall <maikmhall@gmail.com> 7/18/2025 1:15 AM

PMRF testimony

To info@pmrf-kpgo-eis.com

Aloha

I am writing to express my strong opposition to the U.S. Navy's proposed retention of leased lands at Pacific Missile Range Facility.

As a spouse of an active duty Airman, and a Native Hawaiian, my needs as a Hawaiian must come first. He Hawaii au, mau a mau. I am Hawaiian now and forever. I cannot sit by and allow the military to keep desecrating Hawaiian lands. Look what the Navy did to Kahoolawe. The Army has many other lands to train at and to practice its amphibious warfare and bombing. Better yet, you can train in California where there is lots of land to destroy.

Additionally, the military training activities of this scale are simply not compatible with the intention of conservation, upholding cultural integrity, and aloha ʻāina. Enough is enough.

The military population is unsustainable in Hawaii. Hawaiians have always been a sustainable people. We care for our lands and clean up our messes. Give us back our lands and we will clean it up the way it should be. To nourish our people, and so our legacy may live on. I urge the members of the land board to respect the land, the culture, and the people of Hawaiʻi by giving back this land to Hawaiians. Do what is pono, what is just and right. Mahalo.

Sincerely,
Mai Kapuaoihilani Mei Lin Hall

ʻAliapa'akai, Kona, O'ahu

E malama pono,

Mai K. Hall

"'A'ohe pau ka `ike i ka halau ho`okahi"
~Not all knowledge is learned in the same place
~ One can learn from many sources

DEIS Comment Letter 0030

PMRF-1145 (Record 48 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Clarence	**Last Name** Estes	**Mailing List** Yes	
Street Hahai	**City** Waimea	**State** HI	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments I am totally in APPROVAL of the U.S. NAVY PACIFIC MISSILE RANGE FACILITY to continue their mission and to occupy the lands required for its operations. This base has some of Hawaii's most pristine beaches and the lands free of soil contamination & waste. Their contribution to our National Defense is paramount!			

DEIS Comment Letter 0031

STEPHENIE BLAKEMORE <stephenieblakemore@sbcglobal.net> 7/19/2025 2:29 PM

Re: Reminder: Public Meeting for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Environmental Impact Statement starts in 1 hour

To info@pmrf-kpgo-eis.com

No to this renewal plan.
I realize the Pacific is a vulnerable place strategically. I am thinking particularly of China in the Pacific, which is a growing threat to many countries, including the USA. However poor stewardship of the land resulting in depleted wetlands and ocean environments which threaten rare and indigenous species, as well as the impact the environmental disregard has on cultural practices needs to be correctedin a big way. Missle firing, war games: these cannot be an option anymore. Being prepared is one thing, but what we are defending cannot be destroyed in the name of being prepared.
Much of the economic impact to workers can be done with sound environmental and cultural awareness and respect.
Thank you for holding these hearings

Sent from AT&T Yahoo Mail on Android

> You can submit a comment to this email address.
>
> Sincerely,
> PMRF and KPGO Real Estate EIS Team
>
> > On 07/17/2025 1:23 AM EDT STEPHENIE BLAKEMORE <stephenieblakemore@sbcglobal.net> wrote:
> >
> > Please send me an email that provides a mailing address to send my EIS input.
> > What I heard tonight was poweful truth..any one speaker from yhe community supports this. That was powerful truth.
> >
> > Sent from AT&T Yahoo Mail on Android
> >
> > > On Wed, Jul 16, 2025 at 3:55 PM, Project Support <no-reply@zoomgov.com> wrote:

Passcode	498308
Description	Live broadcast of the public meeting at the Kekaha Neighborhood Center. Webinar opens at 5:00 p.m. HST. Navy and NASA presentation from 6:00 p.m. to 6:30 p.m. HST, followed by oral comments from the public attending in person and online from 6:30 p.m. to 8 p.m. HST.

Add to: Google Calendar | Outlook Calendar(.ICS) | Yahoo Calendar

You can cancel your registration at any time.

Please submit any questions to: info@PMRF-KPGO-EIS.com
Thank you!

WAYS TO JOIN THIS WEBINAR

- **Join from PC, Mac, iPad, or Android**

  Join Webinar

If the button above does not work, paste this into your browser:
https://www.zoomgov.com/w/1607607604?tk=ygzcWvK1BRk6fjY0UFNCTHw-OJdVtJ5ysGB76oIMYes.DQgAAAAX9IINBZTcVZSeXBSZ1NmQ2RXOFg4SzJuYWtBAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA&pwd=3iE3fb7C6FQt0MrSBsqshejihetMYq.1&uuid=WN_KbtBGCYMTLSNgEmdMcay0g

To keep this webinar secure, do not share this link publicly.

- **Join via audio**

Or, dial:	US: +1 669 254 5252 or +1 551 285 1373 or +1 646 828 7666 or +1 646 964 1167 or +1 669 216 1590 or +1 415 449 4000 More International numbers
Webinar ID:	160 760 7604

DEIS Comment Letter 0031

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San Jose, CA 95113

DEIS Comment Letter 0032

PMRF-1147 (Record 47 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Richard	**Last Name** Gioscia	**Mailing List** Yes	
Street 8589 Kaumuali'i Hwy	**City** Kekaha	**State** HI	**Zip** (none)
Email RICHARMGIOSCIA@GMAIL.COM		**Organization**	
Attachments Yes • File Attachment: transportation_impact_gioscia.pdf			
Comments SEE ATTACHMENT FOR EIS OMISSION ON TRANSPORTATION IMPACT			

DEIS Comment Letter 0032

Comments on Draft EIS Statement Regarding Transportation

Richard Gioscia

Kekaha, HI

Please note the following:

- Personnel, contractors and vendors impact the volume of traffic on Kaumuali'I Hwy. in Kekaha. I estimate that there are more than 4000 one way trips through Kekaha each day, Monday through Friday due to base operations.
- Both KPD and HDOT have documented that the average speed on the highway is over 43 mph in a 35 mph zone.
- I have personally had vehicles leaving the base pass me in the 50 mph zone prior to the State park at speeds in excess of 65 mph.
- The Draft EIS does not address the safety risks due to the volume of traffic and the lack of speed mitigation measures on Kaumuali'I Hwy. There are pedestrians, cyclists and local traffic to whom this traffic poses a danger.

The final EIS should include the requirement for traffic calming measures and a reduction in the speed limit to 25 mph on Kaumual'I Hwy in Kekaha. It is unacceptable and a serious omission that the Draft EIS is silent on this issue.

Public Meeting Comment Form

Date: 7-15-25

Please submit comments on the Draft EIS by August 7, 2025, 11:59 p.m. HST. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

- In person at a public meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by August 7, 2025 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

My concern is for the septic water systems Associated with guest cottages + Housing and Planned developments near our beaches and how these sandy Dunes are Being Managed for effuients with increased development of the coast on PMRF,

What is the Plan to monitor and improve our clean waters including Run offs

Please provide your mailing address to receive future notifications about the project.

1. Name: Greg Holzman
2. Organization/Affiliation (if applicable):
3. Mailing Address: PO Box 764 Kekaha Hi 96752

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

Please turn in this form at a public meeting, submit online at PMRF-KPGO-EIS.com, send by email to info@PMRF-KPGO-EIS.com, or mail to:

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

Public Meeting Comment Form

Date: 7/16/25

Please submit comments on the Draft EIS by August 7, 2025, 11:59 p.m. HST. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

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- By mail, postmarked by August 7, 2025 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

#3 Employer on the Island
Very Strotikgic Projects for Our Safety
PMRF Works Well with the Community and the Island
Helps with My Piece of Mind Knowing what Is Being test at PMRF
for my families Safety -

Very - Involved with the Community Both Physically & Monetarily

We should have the State just Grandfather their Lease

Please provide your mailing address to receive future notifications about the project.

1. Name: Dennis Eguchi
2. Organization/Affiliation (if applicable):
3. Mailing Address: P.O. Box 337 Kekaha KAUAI

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

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** Please Print Clearly ** Additional Space is Provided on Back **

Open complete runway excess from the 3rd wind sock south to the red gate on the North those areas have been closed for ~~years~~ a long time fishing is great in those areas. You have 3 types of security on the boat and security cameras including night vision & thermo capabilities I feel if you open it up the West side would be pleased at least the hunter gatherers.

Please provide your mailing address to receive future notifications about the project.

1. Name: Jose San Agustin JR
2. Organization/Affiliation (if applicable): West side hunter gatherer
3. Mailing Address: Keiumi.Kai808@gmail.com

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

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- By mail, postmarked by August 7, 2025 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

- CONSIDER OTHER USES THAT ASSIST IN HOUSING FOR THE LOCAL POPULATION AND HOUSING. RECOMMEND THE FOLLOWING: ~~RE~~PARCELS 15 ACRES & SMALLER, MEDIAN INCOME $200,000 & LESS, 5YR RESIDENT.
- RESEARCH OTHER HISTORICAL SITES SUCH AS MANA INTERNMENT CAMP AS WELL AS CULTURAL.
- RESEARCH OPPORTUNITY TO USE 7 CAPPED WELLS IN MANA MARSHLAND

Please provide your mailing address to receive future notifications about the project.

1. Name: KAIMANA CASTANON
2. Organization/Affiliation (if applicable):
3. Mailing Address: P. O. BOX 1306, KEKAHA, HI 96752

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

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- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by August 7, 2025 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

Follow The laws of Occupation!
I say No to any EIS by the U.S. Military. First they have no Rights ~~Fnternationally~~ to be here. No Treaty of Peace or Annexation to claim any Right to be here. The U.S. military is the largest Pollutane on the Planet. To say they can past any EIS is a joke. U.S. military just allowed jet Fuel to leak and didnt want to fix the Problem. Inaddition their operation in Pohakuloa will not be cleaned after they leave. How is that proper protocol for any land that they use. The U.S. military is NOT a good land user here. In Hawaii.

Please provide your mailing address to receive future notifications about the project.

1. Name: MERVIN CHUNG
2. Organization/Affiliation (if applicable): Kanaka Oiwi
3. Mailing Address: 331A Kapau Rd Koloa, HI 96756

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

Please turn in this form at a public meeting, submit online at PMRF-KPGO-EIS.com, send by email to info@PMRF-KPGO-EIS.com, or mail to:

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

Public Meeting Comment Form

Date: 16 JULY 2025

Please submit comments on the Draft EIS by August 7, 2025, 11:59 p.m. HST. The Navy and NASA encourage the public to speak to project representatives available at tonight's meeting and to visit the website for project updates. The public may submit comments in any of the following ways:

- In person at a public meeting
- Through the project website at **PMRF-KPGO-EIS.com**
- By email to **info@PMRF-KPGO-EIS.com**
- By mail, postmarked by August 7, 2025 (see address below)

** Please Print Clearly ** Additional Space is Provided on Back **

PLEASE CONTINUE TO LEASE LAND AT PMRF. THE NAVY AND FELLOW TEAMS OF CONTRACTORS, UH AND GOVERNMENT REPRESENTATIVES HAVE SHOWN TO BE GOOD STEWARDS OF NATURAL AND CULTURAL RESOURCES WHILE ALSO PERFORMING VITAL SUPPORT TO MILITARY AND SCIENTIFIC VENTURES
MAHALO

Please provide your mailing address to receive future notifications about the project.

1. Name: TOM CLEMENTS
2. Organization/Affiliation (if applicable): RET AIR FORCE / RET PMRF CN & RV
3. Mailing Address: 5725 TAPA ST, KULA HI 96756

In the event the contents of specific comments are incorporated into the environmental review analysis, released in whole or in part in response to a Freedom of Information Act request, or otherwise disclosed to the public, the Navy and NASA will include the name of the individual or entity submitting the comment, but will not publish or otherwise disclose other potentially-identifying information such as home addresses, e-mail addresses, or telephone numbers.

Please turn in this form at a public meeting, submit online at PMRF-KPGO-EIS.com, send by email to info@PMRF-KPGO-EIS.com, or mail to:

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

DEIS Comment Letter 0039

Russell <1397rtsuji@gmail.com> 7/21/2025 10:10 PM

Comments to Navy and NASA's DEIS--Pacific Missile Range Facility--continued use of State leased lands

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> Copy home <tsujir001@hawaii.rr.com>

Sir/Madam:

The Hawaii Environmental Policy Act ("HEPA") requires a disclosure of all cumulative impacts together with studies of those impacts and alternative mitigation measures.

I understand the marine training that is occurring in the ocean involves the firing of anti-ballistic missiles from below the surface of the ocean (from submarines) and at surface (from ships or boats) aimed at targets fired from the Pacific Missile Range Facility at Barking Sands. Because the Navy's continued use of the leased lands is essential to the marine training, the EIS for the continued use of the fast lands leased at Barking Sands should have included a disclosure of the impacts to marine biota (whether animal, plant or other living organisms), studies of those impacts, and alternative mitigation measures.

Because the Navy/NASA's DEIS fails to disclose and address the impacts to marine life, the DEIS should be withdrawn or rejected.

Respectfully submitted,

Russell Y. Tsuji

DEIS Comment Letter 0040

Jennifer Kau'i Young <losalioj@hawaii.edu> 7/22/2025 7:44 PM

Written Comment on the 2025 Draft Environmental Impact Statement Pacific Missile Range Facility (PMRF), Mānā, Kaua'i

To info@pmrf-kpgo-eis.com

Written Comment on the 2025 Draft Environmental Impact Statement
Pacific Missile Range Facility (PMRF), Mānā, Kaua'i
Submitted by: Jennifer Kaui Young
Affiliation (if any): Ka Lāhui Hawai'i

Date: July 20, 2025

To Whom It May Concern,
I submit this testimony in direct response to the 2025 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Navy and NASA regarding activities at the Pacific Missile Range Facility (PMRF) in Mānā, Kaua'i. I find it incomplete, inadequate, and deeply flawed in both legal standing and cultural impact analysis. The proposed actions must be halted, and the DEIS withdrawn or significantly revised.

1. Legal Status of the Lands – Seized, Not Ceded
The DEIS repeatedly refers to the subject lands as "ceded." This classification is factually and legally false. These lands were seized—without consent or lawful treaty of annexation—and remain under illegal military control. The Hawaiian Kingdom was recognized as a sovereign nation by the U.S. and many other countries, and no lawful transfer of its national lands has ever occurred.

Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S.Constitution's recognition of treaties as the supreme law of the land (Article VI).

2. Failure to Adequately Document or Disclose Pollution Events
The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with verifiable, public-facing documentation:
● Perchlorate contamination from solid rocket fuel used in missile launches and related propulsion testing.
● PFAS contamination, especially in light of the known airplane fire incident at PMRF in 2020 (source: Honolulu Civil Beat, "Toxic Foam from Military Fire Training Raises Concerns on Kaua'i," 2021).
● The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials.

Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?

3. Inadequate Cultural Impact Assessment
The cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including:
● Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades.
● Leina a ka 'uhane (leaping places of the soul), which are located in proximity to PMRF training zones.
● Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access.
● Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity.

Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "pa'akai analysis" (as required under Hawai'i's environmental review framework) cannot

be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.

4. Incomplete and Inadequate Analysis – Environmental and Procedural Deficiencies
This DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include:
● No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors.
● No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region.
● No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities—especially children—living near military activity zones.
● No generational impact assessment on future health, land use, or cultural restoration.

This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory.

5. Conclusion and Demands
This land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestors. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us—it harms us, visibly and invisibly.
The Navy and NASA must:
1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures.
2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments.
3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners.
4. Acknowledge the land as Hawaiian national land seized without consent, and stop referring to it as “ceded.”
5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established.

Mahalo for your time. Know that this testimony is not only for today, but for the next seven generations.

Jennifer Kaui Young
losalioj@hawaii.edu
Moku O Keawe

DEIS Comment Letter 0041

Cori China <cori.china@k12.hi.us> 7/23/2025 3:40 PM

United States Navy Pacific Missile Range Facility and NASA Kokee Park Geophysical Observatory Real Estate DEIS

To info@pmrf-kpgo-eis.com

Good morning,

Please refer to the attached letter for comments from the Hawaii State Department of Education regarding the subject matter.

Thank you.

Best regards,
Cori China
Hawaii State Department of Education
Office of Facilities and Operations
Facilities Development Branch, Planning Section
3633 Waialae Avenue, Room C209
Honolulu, HI 96816
Phone: (808) 784-5080

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- United States Navy Pacific Missile Range Facility and NASA Kokee Park Geophysical Real Estate Draft EIS.PDF (616 KB)

DEIS Comment Letter 0041

JOSH GREEN, M.D.
GOVERNOR

KEITH T. HAYASHI
SUPERINTENDENT

STATE OF HAWAIʻI
DEPARTMENT OF EDUCATION
KA ʻOIHANA HOʻONAʻAUAO
P.O. BOX 2360
HONOLULU, HAWAIʻI 96804

OFFICE OF FACILITIES AND OPERATIONS

July 22, 2025

Ms. Kerry Wells
PMRF and KPGO RE EIS Manager
Naval Facilities Engineering Systems Command
Hawaii Environmental OPHEV2
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

Re: United States Navy Pacific Missile Range Facility and NASA Kokee Park Geophysical Observatory Real Estate Draft Environmental Impact Statement

Dear Ms. Wells:

Thank you for your letter dated June 18, 2025. The Hawaii State Department of Education provided comments on June 7, 2024, and has no additional comments.

Should you have any questions, please contact Cori China, School Lands and Facilities Specialist of the Facilities Development Branch, Planning Section, at (808) 784-5080 or via email at cori.china@k12.hi.us.

We appreciate the opportunity to comment.

Sincerely,

Roy Ikeda
Acting Public Works Manager
Planning Section

RI:cc
c: Facilities Development Branch

PMRF-1155 (Record 45 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Anna	**Last Name** Barbeau	**Mailing List** No	
Street pobx 593	**City** Wailuku	**State** HI	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments Grievances began with Ka'aholawe, Maui and Red Hill, O'ahu. The continuation of the military squatting on and abusing ancestral land on Kau'ai must be terminated. Navy spokespersons state harmful PFCs in the environment have not been proven, yet common sense is in favor of PREVENTION, not 'oops, sorry' later. Navy illegally disturbs iwi on Hawaiian land and denies access for hunter gatherer purposes. Abuse of the land they leave ruin where they practice 'war GAMES'. It is a sickening display of aggression. Sonar disrupts audio within the natural breeding grounds of marine life of ocean mammals who were here long before humans. To arrogantly bully the peaceful residents and continue to destroy this environment is a crude form of greed via control. The military must not be allowed free access any longer. It is time for them to find other options, perhaps digitally they can platy/practice as much as they need without the continued harm of living beings.			

DEIS Comment Letter 0043

Cheryl B <burgharc@gmail.com> 7/25/2025 11:53 PM

DEIS Pacific Missile Range Facility and Kokee Park comments submission

To info@pmrf-kpgo-eis.com

Respectfully submitting comments regarding the Navy's Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory.

The Navy's DEIS is **incomplete** and **insufficient** for the following reasons:

- It **fails to fully disclose and mitigate impacts to endangered and native species,** including honu, monk seals, and native plants, from military activities, violating Hawai'i Revised Statutes (HRS) §195D (Endangered Species Law).
- It **lacks an enforceable plan and timeline for remediating decades-old PFAS contamination in soil and groundwater**, contrary to HRS §342L (Hazardous Substance Release and Response Law) and public health protections.
- **Cleanup responsibilities** for hazardous waste, unexploded ordnance, and abandoned structures after lease expiration **remain undefined and uncommitted,** in violation of Hawai'i Administrative Rules (HAR) §11-200.1-24(q), which requires disclosure and mitigation of unresolved environmental hazards.
- There is **no recent soil or groundwater testing or adequate risk assessment for large fuel storage tanks**, especially in light of the Red Hill fuel disaster, resulting in potential violations of the Clean Water Act (33 U.S.C. §§1251 et seq.) and HRS §342D (Water Pollution Control).
- The DEIS **omits cumulative impact analysis of RIMPAC military exercises,** despite significant environmental effects, failing to comply with the National Environmental Policy Act (NEPA, 42 U.S.C. §4332) and HRS §343-5, which require consideration of cumulative environmental impacts.
- **It does not meet the Ka Pa'akai o Ka 'Āina standard** (94 Hawai'i 31 [2000]) for protecting Native Hawaiian cultural resources and practices, and it fails to document meaningful consultation with Native Hawaiian organizations as required under HRS Chapter 343 and Hawai'i State Constitution Article XII, Section 7.
- The proposal for permanent federal acquisition of over 8,000 acres of public trust lands **violates Hawai'i Constitution Article XI, Sections 1 and 7,** which mandate state stewardship and protection of natural and cultural resources for present and future generations.
- The DEIS **lacks enforceable measures** to protect public health, groundwater, and ecosystems from hazardous materials and military-related risks, **in violation of HRS §342L and public trust obligations**.

Mahalo for reading these comments regarding the insufficient and incomplete DEIS.

D. Green

C. Burghardt

Nuuanu, Oahu

DEIS Comment Letter 0044

Klayton Kubo <klayton1kubo@gmail.com> 7/26/2025 2:02 AM

Access

To info@pmrf-kpgo-eis.com

I would like to add to my verbal comment. Hopefully we can get more Fisher/Hunter Access. And it will be in stone. Meaning when the next Commander comes in he/she can't change it to their liking. I look forward to more discussions about Access.

Klayton Kubo
Waimea, Kaua'i

DEIS Comment Letter 0045

tsujir001@hawaii.rr.com 7/30/2025 3:23 PM

RE: Comments to Navy and NASA's DEIS--Pacific Missile Range Facility--continued use of State leased lands

To Russell <1397rtsuji@gmail.com> • info@pmrf-kpgo-eis.com

Dear Sir/Madam:

I did not receive a response to my comments on the DEIS. As a reminder, HRS 343-5 requires the applicant/project proponent to respond to the comments received during the DEIS process.

I look forward to receiving the Navy's response.

Regards,

Russell Y. Tsuji

From: Russell <1397rtsuji@gmail.com>
Sent: Monday, July 21, 2025 4:10 PM
To: info@PMRF-KPGO-EIS.com
Cc: home <tsujir001@hawaii.rr.com>
Subject: Comments to Navy and NASA's DEIS--Pacific Missile Range Facility--continued use of State leased lands

Sir/Madam:

The Hawaii Environmental Policy Act ("HEPA") requires a disclosure of all cumulative impacts together with studies of those impacts and alternative mitigation measures.

I understand the marine training that is occurring in the ocean involves the firing of anti-ballistic missiles from below the surface of the ocean (from submarines) and at surface (from ships or boats) aimed at targets fired from the Pacific Missile Range Facility at Barking Sands. Because the Navy's continued use of the leased lands is essential to the marine training, the EIS for the continued use of the fast lands leased at Barking Sands should have included a disclosure of the impacts to marine biota (whether animal, plant or other living organisms), studies of those impacts, and alternative mitigation measures.

Because the Navy/NASA's DEIS fails to disclose and address the impacts to marine life, the DEIS should be withdrawn or rejected.

Respectfully submitted,

Russell Y. Tsuji

DEIS Comment Letter 0046

Sholin, Carl E. <carl.e.sholin@hawaii.gov> 7/30/2025 7:41 PM

Request GIS Geodatabase files

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Hello,

I'm a planner for one of your partnering agencies: Hawai'i State Parks. I would like to request copies of the ArcGIS Geodatabase files that contributed to the Draft EIS. I would like copies of the leased lands and the easements.

Thank you very much for your help!

All the best,
Carl Sholin
State Parks Planner

P.O. Box 30848
Anahola, Hawaii
96703-0848

DEIS Comment Letter 0047

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Department of The Navy
ATTN: PMRF and K.P.G.O.R.E. EIS Project
Manager Kerry Kylene Ling
400 Marshall Rd - Building X-11
Pearl Harbor HAWAII 96860

po box 30848 Anahola, HAWAII 96703-0848

DEIS Comment Letter 0047

19 July 2025

To: Dawn N.S. Chang, Chairperson – Board of Land and Natural Resources -1151 Punchbowl Honolulu, 96813

To: David A. Reth, Director Management Operations – NASA Goddard Space Flight Center

To: Robert Prince, Captain, U.S. Navy, Commanding Officer – PMRF

To: Naval Facilities Engineering Systems Command,
Environmental OPHEV-2
Atten: PMRF and KPGO
Atten: *EIS* Navy Project Manager, Kerry Kylene Ling 400 Marshall Rd – Bldg X-11 – Pearl Harbor, HI 96860

Subject: PROSED REAL ESTATE ACTION – published in the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate draft Environmental Impact Statement (dEIS).

TMK **(4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2- 002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)**

NO ACTION ALTERNATIVE

We are against the proposed REAL ESTATE ACTION published in the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate draft Environmental Impact Statement (dEIS).

BOTH of proposal(s)

The U.S. Navy – PMRF to retain the use of 8,172 acres of state lands in Koke`e, Kaua`i, **and** the National Aeronautics and Space Administration (NASA) proposal to retain the use of 23 acres of state lands at Kōke'e Park Geophysical Observatory (KPGO).

Please Chairperson Chang, – State of Hawai`i – Board of Land and Natural Resources, DO **NOT** renew the leases as proposed by The U.S. Navy PMRF – Please deny the the U.S. Navy – PMRF proposal to retain the use of 8,172 acres of state lands in Koke`e, Kaua`i, and National Aeronautics and Space Administration (NASA) proposal to retain the use of 23 acres of state lands at Kōke'e Park Geophysical Observatory (KPGO).

Please **No Real Estate Action** on TMK(s) **(4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2- 002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)**

Let ALL leases expire in 2027 and 2030

No more real estate agreements with the U.S. Navy – PMRF leasing the State of Hawai'i Lands of 8,172 acres, **No Real Estate Action** on TMK(s) **(4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2- 002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)**

NO ACTION ALTERNATIVE Sincere ALOHA, `Ohana Keana`aina, Keli`ikoa, Kai`aokamalie & Bator

Keanaaina, Keliikoa, Kaiaokamalie, & Bator – Aloha

DEIS Comment Letter 0048

Michael Jones
1434 Punahou St Apt 608
Honolulu, HI 96822

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JUL 26 2025

Naval Facilities Engineering Systems
Command, Hawaii Environmental OPHEV2
Attn.: PMRF and KPGO RE DEIS Project
Manager Ms. Kerry Ling,
400 Marshall Road
Building X-11, Pearl Harbor HI 96860

DEIS Comment Letter 0048

24 July 2025
BY: USPS
TO: Naval Facilities Engineering Systems Command
Hawaii Environmental OPHEV2
Attn.: PMRF and KPGO RE DEIS Project Manager
Ms. Kerry Ling, 400 Marshall Road
Building X-11, Pearl Harbor HI 96860
FROM: Michael Jones

Thanks for sending me a printed copy of volume 1 of the 2025 PMRF and KPGO RE DEIS. Because this DEIS does not contain details about the missiles to be launched from PMRF and other launch sites I have included comments on previous EIS documents -- in particular the 1998 PMRF Enhanced Capability final EIS and the 2008 PMRF Hawaii Range Complex FEIS/OEIS.

My comments on the 1998 PMRF Enhanced Capability final EIS are dated 1/4/1999. Those on the draft EIS are reproduced in the final EIS. Page numbers in the final EIS are

date	FEIS pages
5/31/1998	9-427 to 9-428
5/22/1998	9-382 to 9-383
5/15/1998	9-378
5/3/1998	9-322 to 9-327 + 6 appendices
	9-327 to 9-328 app A-1 to A-3
	9-329 A-4
	9-329 to 9-330 A-5 to A-6

Comments on the 2008 PMRF Hawaii Range Complex FEIS/OEIS are dated 3 June 2008. Those on the draft EIS are reproduced in the final EIS on pages 13-243 to 13-246.

THe PMRF and KPGO RE DEIS lists related environmental analyses for PMRF.
page 1-24 1998 PMRF Enhanced Capability final EIS
page 1-25 2008 PMRF Hawaii Range Complex FEIS/OEIS
A document titled "Laser Safety Survey Report for the Pacific Missile Range Facility Open Ocean Range" was said to be "not releasable to the public" but no justification was given.
page 1-28 HDR-Hawaii draft EIS
"contains sensitive information and not publicly available"
Table 1-5 contains a list of environmental documents for PRRF. It des not contain the following:
Final EIS for STARS in May 1992
Draft EIS for STARS in March and April 1992
Supplement to the STARS Environmental Assessment

DEIS Comment Letter 0048

in July 1991
Environmental Assessment for the Strategic
Target System (STARS) in August 1990
These documents are cited on pages 3-13 and 3-15.

launch sites not analyzed
Some possible launch sites not analyzed were considered previously. The 1998 PMRF Enhanced Capability final EIS considered sites on Niihau. High energy laser tests on Niihau were considered in the Hawaii Range Complex EIS. Are they still being considered?

fire risk from missile malfunction
Section 3.12.1.4.1 discusses handling of hazardous materials including those from missile malfunctions. It does not discuss specific missiles or a record of past launches. In order to evaluate risk from launches, it would be useful to have a list of launches since 1990 including dates and missile types. For launches which had a missile malfunction, it should be noted if the flight was terminated by the range safety officer, if debris hit outside the GHA, and if a brush fire was started.
The wildfires on Maui in 2023 and at Vandenberg AFB following a Minuteman failure on 15 June 1993 are sobering reminders of fire risks. The fire at Vandenberg AFB burned 1,000 acres. However, the response to my comment on the Hawaii Range Complex EIS stated that "Navy does not see a catastrophic launch failure as a reasonably forseeable impact."

Michael Jones
1434 Punahou St, Apt 608
Honolulu, HI 96822

DEIS Comment Letter 0048

4 January 1999

Comments on the Pacific Missile Range Facility (PMRF) Enhanced Capability
Final Environmental Impact Statement (FEIS)

I received the FEIS on 29 Dec. 1998. I have reviewed the FEIS and responses to my comments on the corresponding draft (DEIS). The responses to some of my comments are adequate and provide useful information but most responses avoid important and relevant issues. Some responses are misleading or contain incorrect statements. The EIS is said to be intended to provide the basis for deciding how to enhance PMRF and what remote sites to develop for TMD testing but there is no comparison with capabilities and impacts at other TMD test sites and inadequate detail about what missiles would be launched for tests at PMRF. The comments by the U.S. EPA (pages 9-42 to 9-46) note the uncertainty about what the Proposed Action entails and insufficient information about the purpose and need for the Proposed Action. The EIS is also intended to provide the State of Hawaii information relevant to decisions about land use by the Navy near PMRF, including the restrictive easement for missile launches. However, the FEIS does not specify what missiles and what ground hazard areas require the easement and provides insufficient information to judge what launches are needed for Navy TMD tests. Furthermore, inadequate information is provided to assess environmental impacts, particularly on Niihau. Finally, the statement on page 4-257 that there are no unresolved issues seems to be contradicted by the statement in the 23 Nov. 1998 letter (page K-46) signed by Capt. J.A. Bowlin and Michael D. Wilson that an ethnographic survey will be done prior to conducting activities on Niihau.

Below are detailed comments. The numbers refer to comment numbers in my DEIS comments dated 3 May 1998. (See FEIS pages 9-322 to 9-327.)

1 & 25) Alternatives

The response on page 9-330 contains no detailed discussion of alternatives and no additional background information is provided in section 1.1.1 of the FEIS. Comparison with other test ranges is relevant because other ranges have been selected in previous EIS documents. An addition on FEIS page 1-4 notes that previous analyses focused on tests of the Army's land-based interceptors and asserts that PMRF was not selected previously "because of limited instrumentation to support these land-based interceptor needs." There clearly are alternatives for such tests, and there is no Congressional direction that PMRF be the primary range for testing land-based interceptors. In addition, Navy TBMD tests are considered as possibilities in the 1998 EIS for TMD tests at the Eglin Gulf Test Range.

The diagrams in Fig. 1.4-1 of the various options within the Proposed Action provide a good illustration of the uncertainty noted in comments by the U.S. EPA. How can decision makers and the public evaluate the Proposed Action when there are some many options within it? For example, there are five possible missile launch sites at PMRF and two on Niihau for both targets and interceptors. (The diagram of target options incorrectly states that Niihau site A is the South Site and site K is the North Site.) The impacts depend upon how many sites and which sites are used and what missiles are launched from them. Tests of Navy interceptors would presumably not require long-range targets launched from PMRF or Niihau and thus would seem to reduce the impacts there. As noted above, there are alternative ranges for tests of land-based interceptors. Therefore, it seems justified to present this as a separate

alternative.

2) Missiles to be launched at different sites

The response on page 9-330 does not indicate which missiles would be launched at the different potential launch sites on Kauai and on Niihau. This information is essential to evaluate the necessity for and adequacy of the ground hazard area (GHA) at each site and treaty compliance.

3) Ground Hazard Areas (GHA)

The response on page 9-330 refers to FEIS Section 4.1.1.7.1.1 but this section contains only a discussion of a generic GHA. Neither the response nor the FEIS explain what "adjustments in system performance and adjustments in allowable flight termination response time" are needed to reduce the Hera GHA radius from the nominal value of 23,000 feet to 10,000 feet. The response incorrectly asserts that a 13,000 foot GHA was identified in the 1994 Wake Island EA; as I noted in my comment on the DEIS, the Hera GHA radius is given as 7.2 kilometers (over 23,000 feet) in three previous environmental analyses, including the 1994 Wake Island EA. The FEIS should have given the flight termination response times corresponding to different GHA radii. The response on page 9-241 to a simulation by David Wright of debris dispersal from a plausible Hera failure is egregiously inadequate.

4) Missile reliabilities

The response on page 9-331 gives no reliability estimates and asserts that "the reliability of individual missiles cannot be used to predict overall program reliability." Even if the overall program reliability depends on other factors and given that not all failures result in flight termination, missile reliabilities are important and relevant factors in determining the risk from launch failures. The response asserts that all debris from the Hera flight termination on 17 Nov. 1997 was contained within the pre-specified safety area. This is relevant for evaluation of the adequacy of the safety area -- which is why I suggested a similar analysis of the Minuteman and Aries failures in my comment 5.

5) Analysis of previous accidents as possible launch failures

The response on page 9-331 avoids discussion of the Minuteman and Aries failures I cited. No comparison is made of the capability of the MAET fire suppression with that at Vandenberg AFB, where the Minuteman failure occurred. No response is made about debris from the Aries failure which fell on land as far as 13,500 feet from the launch pad despite the fact that an Aries launch at PMRF in November 1998 apparently had a GHA radius of 10,000 feet. Plans for such an Aries launch were not mentioned in the FEIS even though an amendment to the Restrictive Easement was required.

6) Risk analyses, safety record for missiles near Kauai

The response on page 9-331 states that risk analyses have not been done for each launch vehicle proposed but does not state for which vehicles analyses have been done. Until these analyses are done there is no basis for the assertion in the response that "minimal risk exists to public safety." The fatality in the December 1988 accident is important and relevant because it demonstrates that safety measures can fail and suggests that the actual risk may be considerably larger than the goal of an annual collective risk less than 0.001 fatalities.

DEIS Comment Letter 0048

7) Trajectories for targets and interceptors

The response on page 9-331 asserts that "specific trajectories and impact zones do not have to be provided." Without this information, there is no basis for judging the risk. As I noted in my comment on the DEIS, this information is provided for various testing scenarios in the Gulf of Mexico.

8-10) Treaty restrictions on targets launched at sea and on air-drop targets

The treaty compliance issues noted in my comments are important and relevant because some proposed tests seem to violate INF Treaty restrictions, as recognized in the 1994 TMD Extended Test Range EIS. The response on page 9-331 states merely, "We will not implement any actions that are not in accordance with current U.S. policy on treaty compliance." Without a detailed discussion of compliance issues, this statement is no more reassuring than the statement by Pres. Reagan in 1986 that the U.S. would not trade arms for hostages.

11-12) Monitoring results from STARS launches

The response on page 9-331 does not even mention results of air quality monitoring for the 3rd STARS launch on 22 July 1994 and does not discuss the lack of monitoring data at the GHA boundary downwind of the launch pad for both launches for which monitoring was done. The absence of relevant data at the GHA boundary means that there are no measurements that can be used to assess air quality impacts.

13) Lead contamination in soil

The response on page 9-331 states that the reference to the report on the baseline soil sampling has been corrected and notes that this is the only soil sampling conducted to date. The baseline results are useful and relevant, but the lack of any other sampling hardly seems to satisfy the commitment to periodic monitoring in the Oct. 1993 Restrictive Easement Final EIS that the Navy "will conduct a baseline survey for possible lead contamination around the Vandal launch site and conduct periodic monitoring to assess the potential impacts from all launches from that launch site."

The response further asserts that "all of the samples were well below" U.S. EPA and State of Hawaii cleanup goals for commercial or industrial use property. Presumably this statement refers to the lead levels in these samples. However, neither the response nor the FEIS text gives numerical values of commercial or industrial cleanup goals although an addition on page 3-47 of the FEIS states that the State of Hawaii 400 mg/kg cleanup goal applies for residential use. The letter from Bruce Anderson on page 9-124 notes that the Hawaii cleanup guideline for commercial and industrial use is 1000 parts per million (equivalent to 1000 mg/kg). I noted in my comments on the soil sampling report (see page 9-378) that the highest lead level in the samples was 980 mg/kg. It seems misleading to characterize this as "well below" the Hawaii guideline. Because the future use of the land near the Vandal launch pad is uncertain, it is unclear which cleanup guideline should be applied. (On FEIS page 3-63, it is noted that PMRF is located within a conservation district according to State of Hawaii Land Use Classification.) One might have hoped that the more stringent guideline would be used, especially because the high lead levels resulted from a launch failure and were apparently confined to relatively small areas. In fact, paragraph 9 of the existing Restrictive Easement for STARS and Vandal launches (FEIS Appendix C) states that the GRANTEE will "clean up any debris or any releases of hazardous substances resulting from its launches in accordance

with all federal and applicable State and local environmental laws."

14) STARS launches through 2030

The response on page 9-331 provides no information on planned STARS launches or launches of other large rockets. An Aries launch from PMRF in November of 1998 was one of two allowed by a 28 August 1998 amendment to the Restrictive Easement. Estimates of future STARS and Aries launches seem necessary to judge cumulative impacts.

15) Vandal launches through 2030

The response on page 9-331 does not give the number of Vandals in the current supply or an estimate of the number of Vandal launches expected. How can the cumulative impacts due to lead contamination be assessed without this information and specific information about possible Vandal replacements?

17) Record of launches under existing easement

The response on page 9-332 notes that Table 3.1.2-1 has been revised. The information about the launches using the 10,000 foot GHA has indeed been corrected but the changes to the numbers in the 6,000 foot GHA column are confusing because some of the numbers lined out were not in the DEIS. No information is provided about the length of time exclusive control of the easement area was exercised. The response does not specifically discuss my comment that the 15 Vandal launches in 1994 exceeded the commitment to an annual maximum of 8. Although the easement does not explicitly limit the number of launches, the draft and final Restrictive Easement EIS stated that there would be "no more than eight Vandal launches in a 1-year period."

18) Revised Restrictive Easement

The two-sentence response on page 9-332 provides no information on what missiles and which launch pads require the easement. It does not address whether the easement is needed for Navy TBMD tests. From the testing scenarios illustrated in the FEIS, it seems that the easement would be primarily for land-based interceptors launched from PMRF, for which there is no Congressional direction. Without specific information about missiles and their ground hazard areas that will be subject to the easement, there is no way for the State of Hawaii or the public to assess whether the easement is needed and appropriate.

19) Niihau -- fire danger

The response on page 9-332 makes no attempt to evaluate the adequacy of the proposed fire fighting equipment that would be brought to Niihau.

24) Public access to related documents

I do appreciate the effort made to provide the 15 documents I requested. As I noted in my comments dated 22 May (page 9-382), 13 of the 15 documents were available only a week before the 26 May deadline for comments. I was able to make a special effort and briefly review these documents during Hamilton Library hours but it would have been very difficult for most people to access these documents even if they were aware of their availability. For this reason I requested an extension of the public comment period. Given that consultations with federal agencies continued until October (The 21 October 1998 letter from the National Marine Fisheries Service notes on page K-24 that the Navy requested the removal of Tern

Island and Johnston Atoll in September.) and that consultations with the State of Hawaii continued until late November (as evidenced by letters on pages K-36 through K-47), it is hard to understand why the formal deadline for public comment was not extended.

26) Navy Theater-Wide testing

The response on page 9-332 continues to assert that, "The Theater-Wide program is not sufficiently developed to be included in this analysis." The information cited in my comment, including the information in the 3 March 1997 Coordinating Draft Siting Report that I cited in my comment dated 22 May, shows that the Theater-Wide program is sufficiently well-defined that potential launch sites and scenarios have already been examined. At the very least, information about these launch sites should have been included in the FEIS because the Siting Report is not readily available.

27) TMD testing schedule

The response on page 9-332 provides no schedule information and does not respond to the information I cited in GAO report NSIAD-98-34. The FEIS should have provided some schedule information; it should surprise no one that PMRF operations would not be constrained by any schedule given in the FEIS.

The response on page 9-379 implies that the lead levels in the soil samples taken near the Vandal launch pad were compared to the U.S. EPA remediation and State of Hawaii cleanup goals for commercial and industrial property in the Soil Contamination Report. As my comment noted, the lead cleanup goals mentioned in this report were 500 mg/kg and 400 mg/kg respectively. The report notes that samples at two sites had lead levels exceeding these goals and does not discuss cleanup goals for commercial and industrial property.

Response 1 on page 9-429 implies that my comment suggested an alternative involving launching targets between PMRF and USAKA. My comment on page 9-427 referring to the 1995 USAKA Temporary Extended Test Range Environmental Assessment was that USAKA is an alternative to PMRF for tests of Patriot land-based interceptors. The Congressional direction to which the response refers concerns only tests of Navy interceptors, not tests of land-based interceptors. The response avoids discussion of my suggestion on page 9-428 for distinguishing tests in which the intercept is intended to occur near PMRF from tests in which the intercept is off-range. The response provides no explanation why the 3 March 1997 Siting Report was not made available to the public during the scoping meetings in June of 1997.

The comments expressed above are based on my review of the DEIS, FEIS, and related documents. These comments are my views and are not official positions of the Dept. of Physics & Astronomy or of the Univ. of Hawaii. I hope they will be considered before the Record of Decision is released.

Michael Jones

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DEIS Comment Letter 0048

3 June 2008

via E-mail to: feis_hrc@govsupport.us

Below are my comments on the final EIS/OEIS for the Hawaii Range Complex. I received the printed Executive Summary and CD containing the final EIS/OEIS in an envelope postmarked 14 May 2008. The cover letter states that comments must be received by 9 June 2008 but this clearly does not allow a 30-day period for public comments. The deadline should be extended until 30 June.

The response to my comment S-E-0003-1 on page 14-113 asserts that NEPA does not require indications noting whether references are available for public review. As I noted in my comment, one of the documents I requested (Solis, P., 2004) was said to be "not releasable to the public." It is labeled "For Official Use Only" on page 9-89 of the final EIS. The response does not justify why this document, which is titled "Laser Safety Survey Report for the Pacific Missile Range Facility Open Ocean Range" is being withheld.

The response to comment D-E-0324-4 on page 13-473 does not address the two examples I gave which demonstrated that alternatives to the HRC exist for some Navy training activities.

The response to comment D-E-0324-7 on page 13-474 dismisses my comments about INF and START Treaty restrictions as "not applicable to the proposed tests discussed in this EIS/OEIS." The response does not address the apparent violation of INF range restrictions on target missiles in the conceptual intercept scenarios in Figs. 2.2.2.5.1-4 and 2.2.2.5.1-5.

The two-sentence response to comment D-E-0324-18 on page 13-477 is egregiously inadequate. It asserts that "Navy does not see a catastrophic launch failure as a reasonably forseeable impact" despite the explicit example I cited of the 15 June 1993 Minuteman failure at Vandenberg AFB. I noted that a brush fire resulting from a similar failure at PMRF could trap people in Polihale State Park.

The response to comment D-E-0324-19 on page 13-477 asserts that the HRC EIS/OEIS "does evaluate Aegis Ballistic Missile Defense (BMD) tests." It does not address why no environmental analyses, including conceptual intercept scenarios, were done for previous Aegis BMD tests.

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DEIS Comment Letter 0049

Nathaniel Fisher <kauaifisher@gmail.com> 8/4/2025 2:52 PM

Access to the coastline

To info@pmrf-kpgo-eis.com

To Whom It May Concern,

My name is Nathaniel Fisher. I'm 38 years old, born and raised here on the island of Kaua'i. I'm writing regarding public access to the coastline fronting the PMRF base.

Growing up, I spent countless days camping, surfing, and enjoying bonfires with friends and family in the area between Shenanigans and Majors Bay reef. It was open, accessible, and free of charge; a place full of memories that shaped my childhood. While I recognize and respect the value PMRF brings to Hawai'i, restricting coastal access for local residents feels both unnecessary and disheartening.

Here on Kaua'i, we're constantly watching treasured places slip out of reach. Another trail closed. Another waterfall off-limits. Another beach access lost to development or private ownership. I urge PMRF to consider a solution that allows local residents to access these coastal areas without costly fees or burdensome restrictions.

Access to the ocean is part of who we are. Please help preserve that connection.

Mahalo for your time and consideration,
Nathaniel Fisher

DEIS Comment Letter 0050

Shyanne Olores <officialshykane@gmail.com> 8/4/2025 4:49 PM

Written Testimony Opposing the Lease Renewal of PMRF

To info@pmrf-kpgo-eis.com

Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kaua‘i.

I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our ‘ohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military.

Let me be absolutely clear: this is not America. These are stolen lands.

Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied ‘āina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives.

Over the past 7 years, seven members of my ‘ohana from Mana and Kekaha have died from cancer. All of them worked in agriculture. We know this land has been poisoned. PFAS contamination has been documented at PMRF since the 1960s, and still — over 60 years later — the Navy has failed to clean it up. The Draft EIS casually states that “remediation is forthcoming,” while Kanaka continue to die. That is environmental negligence and cultural violence.

The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we’ve seen at Red Hill — and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future.

The Draft EIS fails to account for the full mauka to makai impacts of PMRF operations. It ignores the destruction caused by rocket launches, amphibious assaults, live-fire drills, and ongoing military exercises such as RIMPAC. It completely omits the environmental and cultural devastation these activities cause — not only on Kaua‘i, but globally, as PMRF supports the testing and export of weapons used in international conflict and genocide.

I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS.

We reject mitigation. We reject any expansion. We reject continued occupation.

We demand that the United States:
1. End the lease.
2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste.
3. Restore sacred sites, including the dunes at Nohili.
4. Return all lands under PMRF to the rightful stewards — the Kanaka Maoli.

PMRF is not defense. It is desecration. And we will not stand by while our ‘āina, our culture, and our families are poisoned in the name of war and profit.

This is not America. This is Hawai‘i. And the U.S. military must get out.

Mahalo for receiving this testimony. I do not stand alone.

Me ka ‘oia‘i‘o,
Shyanne Olores

DEIS Comment Letter 0051

26 July 2025

1212 Punahou St.
Apt. 3108
Honolulu, HI 96826

Naval Facilities Engineering Systems Command
Environmental OPHEV2
Attn: PMRF and KPGO Re EIS PM, Ms. Kerry Ling
400 Marshall Road, Bldg. X-11
Pearl Harbor, HI 96860

Dear Ms. Ling,

Please accept these comments from a former Pacific Missile Range Facility (PMRF) Commanding Officer and, subsequently, Project Manager for two separate contractors whose work was on PMRF, and supportive of its missions.

PMRF is a unique national asset, whose range facility covers a broad ocean area the size of the continental U.S., west of the Mississippi River - and the air above it, and the seas beneath it.

Its geolocation is paramount to its mission, and affords the U.S. and its allies, a safe, unobstructed area in which to train, exercise, Test and Evaluate (T & E) new technologies, and verify the efficacy of legacy systems. No other test and/or training facility in the U.S. affords the nation this capability, and our country is blessed to have use of this invaluable asset.

But PMRF's contributions are not limited to what it provides our military, nor that of our allies, nor Test & Evaluation professionals. *It is an integral part of the island's community.*

PMRF is the third greatest contributor to Kauai County's economy, providing employment for more than nine hundred civilian (federal civil service and contractor) residents, in many cases, spanning multiple generations. And its U.S. military contingent, primarily US Navy, adds another one hundred plus personnel. During bi-annual (every even-numbered year) Rim of the Pacific ("RIMPAC") multi-national exercises, and/or specific T & E events, many other scientific, engineering, and technical experts work at PMRF for weeks at a time – and stay at local hotels, use rented vehicles, and patronize local restaurants, grocery stores, etc.. The combined spending and payroll accounts for these various entities assure a steady, viable revenue source for the county, and is routinely factored into Kauai's annual budget.

While this paper has thus far focused on PMRF's unique contributions to our nation's (and allies) defense, and its monetary benefits to the county, **PMRF is a faithful steward of the leased land on which it sits** – and will literally adjust, postpone, or cancel planned events if there is any doubt as to safeguarding private boaters/fishers in adjacent waters, shearwaters and Laysan Albatross, breeding/calving whales, seals, and protecting feral goats on Makaha Ridge. In those instances, the range is not just an incubator of sorts, it is a facilitator, perpetuating species whose survival rate would be greatly reduced if not for conscientious and rigorous protection efforts, which take priority.

PMRF is also committed to honoring and preserving ancient Hawaiian skeletal remains ("iwi kupuna"), and built an appropriate ossuary to protect them, and remind current generations of their ancestors' legacy. Any iwi kupuna uncovered on PMRF land due to wind, wave, or man-

made impact, are carefully and respectfully interred in this ossuary, with the blessings of a Hawaiian kahu (priest), surrounded by lava rock and appropriate signage. For those unaware, Nohili point is the western-most part of Kauai Island, and in Hawaiian belief, the jumping off place for the spirits of deceased Hawaiians.

PMRF also has clearly marked and protected cemeteries for Japanese immigrants who came to Kauai in the 1880s to work in agricultural fields. While these cemeteries pre-dated the creation of (in succession), the first Kauai airfield, then the US Army Air Corps, then the US Air Force, and now, the US Navy, PMRF is still respectful of, and restricts access to, these cemeteries in honor of those of Japanese ancestry who contributed to Kauai's history. Their legacy assured successive generations would continue to migrate and contribute to the fabric of Hawaii, through each of the major islands. Medal of Honor recipient Daniel Ken Inouye, former US Senator, and other Hawaii born and raised Americans of Japanese ancestry, particularly members of the esteemed 442nd Regimental Combat Team, demonstrated their loyalty to the United States through their sacrifices. US Senator Inouye was a resolute supporter of PMRF ("…my base…") said he on several occasions, referring not to his personal gain, but for the country as a whole. Indeed, every major island within the Hawaiian archipelago has at least one significant project attributed to US Senator Inouye's commitment to the State, and by extension, to the nation's defense.

PMRF's other community-related efforts include hosting **Blood Bank of Hawaii**, where they made the largest single collection effort at that time from one Kauai entity.

PMRF collaborates with **Kauai Community College** on high-tech related degrees to encourage and support Kauai students who, once graduated, become viable employment candidates for PMRF, assuring careers, not just jobs. As a former CO, I made it a point to meet with KCC principles to emphasize PMRF's desire for degreed mechanical, electronic, and other skills to perpetuate the bond between the school, its students, and PMRF.

PMRF "owns" (*is a sponsor of*) **a portion of Highway 50** from its Main gate to Kekaha Beach Park, and as such periodically clears/removes trash ("'opala") from either side of the road. It should be noted Kauai's only trash landfill is on this stretch of highway, and trash is routinely spilled from commercial and individual trash "runs" to the landfill. This is an arduous, dirty, and somewhat risky undertaking, given the traffic volume to/from the base, and particularly in vicinity of the dump. Nonetheless, this is essentially an "all hands" effort, consisting of USN Sailors, federal civil service, and contractor personnel in this "good neighbor" effort.

PMRF established a strong, respectful, and mutually beneficial relationship with Niihau and its small population. The island supports, and participates in, USN Special Operations training for its SEALs, with residents acting as an "opposing" force. And, because PMRF relies on sensors (radar repeaters/radios/diesel-electric generators) installed on the island, the base has trained residents in maintenance and repair skills necessary for recurring operations. Many years ago, the US Navy restored – and gifted - a WWII-era landing craft to support heavy lift operations between Kauai and Niihau. This assures residents they can cross the 18 mile distance between the islands via a mutually beneficial method, and at a fair price: manuahi.

Supports and sponsors interns for **Leadership Kauai** training, where aspiring youth can learn from those in various professions, to help shape their interests, and refine their leadership skills to the benefit of their employers and subordinates. This opportunity is available to incumbent PMRF employees (federal civil service, US Navy, and contractors), and is competitive.

PMRF's Commanding Officer is an ex officio member of the Kauai Economic Council, in recognition of the base's contribution both monetarily and as an employer, independent of the tourist industry. This fact cannot be overstated. PMRF affords good paying, career-oriented federal Wage Grade and General Schedule (WG/GS) job opportunities, as well as those hired as contractors. These individuals are homeowners or renters, school their children in local schools, pay taxes, patronize local businesses, and are fully integrated within all kinds of community events, whether formal or improvised. It is not unusual to have three generations of Kauai-born and raised family members *concurrently* work aboard PMRF, as career employees. Given their lengthy tenure, they are exceptionally well qualified professionals, whose outstanding work is often recognized by large Mainland defense corporations, who count on them for a full suite of services and support.

PMRF's incumbent Community Planning Liaison Officer is the daughter of a previous PAO; both were born and raised on the west side of Kauai, and are highly respected and revered within the community, assuming not only PAO responsibilities, but concurrently serving as staunch community/PMRF advocates, clearly steeped in the culture, history, and governance of Kauai in particular, and the State of Hawaii in general. They establish and perpetuate the strong bond between PMRF and the community, and serve as an unbreakable link between Kauai County Government and PMRF, assuring a cooperative, coordinated, cordial, gracious, and professional relationship. On occasion, there have been contentious issues that could have damaged the relationship. Due to the extraordinary efforts of these two PMRF professionals, whatever the issue, was favorably and mutually resolved by both parties. Their work serves as the model for any federal government/local community relationship, and I'm one of a string of PMRF CO's who was the beneficiary of their individual and collective, outstanding support.

Kauai Island Utility Cooperative (KIUC) recently completed installation of a photovoltaic "farm" and electrical storage (battery) facility aboard PMRF, providing reliable, "clean," solar power primarily to the Westside, and also to the base, if needed. It provides a reliable source of energy, and its panels are protected within the base's fenced perimeter. See the attached KIUC information paper, dated 2018.

PMRF's crash/fire department augments Kauai Fire Department through a Memorandum of Agreement (MoA), which assures mutual fire/emergency support. The result is a commitment to each "partner" (KFD and PMRF Crash/Fire) to support one another as necessary. This effort is not just restricted to crash/fire equipment common to airfields. PMRF's helicopters have been used to conduct helo water drops during brush fires. Moreover, the airfield itself has often been used to support emergency medical evacuation flights for patients needing exigent support on Oahu. Rather than driving from Kekaha, for example, to Lihue, specifically configured aircraft can fly into PMRF, pick up the patient, and transport him or her to Oahu when time is of the essence. Ironically, or perhaps not, PMRF's Crash/Fire training is so rigorous, it serves as a "farm team" for the Kauai Fire Department; those who choose to leave PMRF after being trained as firefighters and certified EMS professionals, are treasured recruits for Kauai FD.

PMRF beach access was denied to the general public subsequent to the terrorist attack on September 11, 2001. While the threat of a similar attack within the State of Hawaii was less than potential Mainland targets, the country couldn't be sure what specific threats it faced, so it initiated "one size fits all" security enhancements. By effectively closing PMRF, generations of Kauai residents suddenly were disenfranchised from Major's Ba, a particularly desirable swimming and fishing location. In June of 2002, controlled access to PMRF was restored to those who wanted to come aboard the facility, and posed no threat to the installation. This effort

was beneficial to both the individuals wanting to resume their prior visits, and the base itself, committed to being a good, reliable, and valued member of the community as a whole.

PMRF has radars and other sensors atop **Makaha Ridge**, whose altitude provides an extremely long radar range, perfect for tracking aircraft or ships on the range and, concurrently, accommodating FAA and HI Air National Guard communications assets there, for the same reason. While each has separate responsibilities, they are complimentary if required, and PMRF is a good steward of this land as well. Indeed, feral goats seem to understand once aboard the navy's facility, they are immune from licensed hunters who are allowed "take" outside the fenced areas.

Culling dead kiawe trees. PMRF routinely culls dead kiawe because they are a fire hazard, and does so very carefully in case there are iwi kupuna in proximity. And rather than haul the dead branches to the landfill adjacent to Kekaha, PMRF allowed a local community group to do the work, and turn the dead wood into charcoal, to be sold to provide uniforms for Waimea High School's athletic teams. This effort concurrently reduced fire hazards; was performed for free by local community groups; provided charcoal for local consumption, and generated funds for Waimea high school. Another example of PMRF's link to the local community.

Unless denied due to increased security levels, or potentially hazardous events related to T & E operations, **PMRF extends invitations to the local community to celebrate National Holidays, where fireworks can be safely displayed for the enjoyment of generations of Kauai residents**. This effort is not just restricted to national holidays; US Navy Seabees built BBQ structures and bathrooms for Major's Bay swimmers/beach goers, and there is no charge for their use. The base recreational facility, "Shenanigan's" is open to any authorized base visitor; it is not restricted to US military active duty, reservists, or retirees – although they all contribute to it through their patronage.

In sum, PMRF's use of leased land has been, and continues to be, exemplary.

The command is very respectful of historic, Hawaiian heritage and cultural sensitivities, and ensures assigned personnel adhere to appropriate practices.

The base protects feral wildlife, even to the detriment of operations.

It is fully invested in KCC, and other Kauai-county related entities with mutually beneficial results, whether fire department, emergency airfield use, and hosting students and leadership trainees.

It contributes fiscal resources topped only by Kauai County Government and tourist-related entities, and its local, career employees are essentially two thirds of the total workforce on base.

PMRF will continue to be an exemplary "neighbor" to Kauai County and Niihau.

It is faithfully committed to being an invaluable, trusted, and integral part of Kauai's fabric, and is respectful and protective of its relationship.

In my nearly 38 years of US Navy service, in various capacities, I know of no other US military/local community relationship as strong and as beneficial as PMRF and Kauai.

I support without reservation. PMRF's continued access and use of these leased lands in perpetuity, confident the relationship is mutually beneficial, and consistent with Hawaiian cultural belief in what is pono.

Donald H. Wilson
CAPT, USN (Ret)

DEIS Comment Letter 0051

Kaua'i Island Utility Cooperative
Your Touchstone Energy® Cooperative

FOR IMMEDIATE RELEASE
6/22/2018
Contact: Beth Tokioka
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PUC Approval Helps KIUC Close In On Renewable Goals

Līhu'e, Kaua'i, HI – 06/22/2018 – Kaua'i should be approaching 70 percent renewable generation by the end of 2019, thanks to an approval received this week from the Public Utilities Commission for development of a 19.3-megawatt (MW) solar facility in conjunction with a 70 megawatt hours (MWh) battery energy storage system to be housed on-base at Pacific Missile Range Facility – Barking Sands (PMRF).

The facility, which will be built by AES Distributed Energy on land leased from the Department of Defense, will displace 2.8 million gallons of diesel annually and will produce enough power to energize 6,000 homes. It will also be one of KIUC's lowest-cost power sources: the cooperative has signed a 25-year power purchase agreement (PPA) with AES at a price of 10.85 cents per kilowatt hour. The project can be "islanded" in certain circumstances in order to increase the resiliency of the PMRF base, which is one of Kauai's leading economic contributors.

"KIUC's Board of Directors set an aggressive goal of reaching 70 percent renewable by 2030," stated Bissell. "Once this project is complete, we will be very close to that mark a decade early."

The AES project at PMRF is the third battery storage project undertaken by KIUC since 2015. In early 2017, KIUC and Tesla opened the world's first utility-scale solar plus storage facility in Kapaia. The Tesla plant is now storing up to 52 MWh of energy on a daily basis, which is primarily dispatched to the grid during the evening peak demand period.

In February 2018, AES broke ground on KIUC's second solar plus battery project in Lāwa'i. Scheduled to be operational by the end of this year, the Lāwa'i facility consists of 28 MW solar photovoltaic and a 20 MW five-hour duration energy storage system.

"These storage projects are moving us rapidly closer to our renewable goals. By the end of 2019, KIUC will be able to supply roughly 65% of Kaua'i's night time peak load with stored solar generated energy. To be able to accomplish this in a cost effective manner was just a dream a few years ago," stated Bissell. "The partnerships between KIUC's engineers and those of some of the best renewable energy companies in the world is making the impossible a reality."

DEIS Comment Letter 0051

(more)

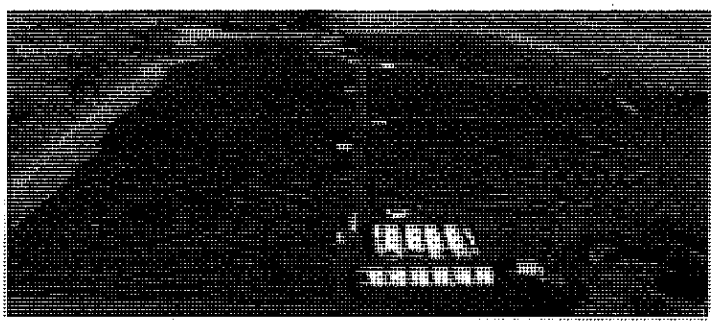
KIUC was recently recognized by the Smart Electric Power Alliance for having more energy storage watts per customer than any utility in the nation in 2017, and was ranked fifth in the nation in total annual megawatts of storage.

Another KIUC renewable project in development will use pumped storage hydro technology to create 25 MW of energy on the west side of Kauaʻi. The Puʻu ʻŌpae project involves the rehabilitation of three reservoirs and other agricultural infrastructure on state land in Waimea. Once complete, the project will not only provide a significant renewable power source for KIUC members, but will also pave the way for the Department of Hawaiian Homelands to place homestead property into productive agricultural use.

"If all goes well with the two AES projects and Puʻu ʻŌpae, we estimate we will be approaching 90 percent renewable by 2023," said Bissell. "It takes an incredible team effort, strong leadership from our Board and the support of our members to make this kind of progress. We should all be proud of how far we've come in such a short time."

###

Community members, along with KIUC and AES personnel, participate in a groundbreaking ceremony for the AES Lāwaʻi project in February 2018



The Tesla solar plus battery facility is located on 50 acres of land leased from Grove Farm in Kapaia

PMRF-1158 (Record 42 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Darlene	**Last Name** Muraoka	**Mailing List** Yes	
Street 7814 Nukupuu street	**City** Kekaha	**State** HI	**Zip** (none)
Email mzdarlene19@gmail.com		**Organization**	
Attachments (none)			

Comments

I'd like to say thank you to PMRF for being the stronghold of the West Kaua'i Community throughout the years. Being born and raised in Kekaha, I have witnessed the many contributions that PMRF has provided to our island community. First, economically, PMRF is one of Kaua's largest employers who provide many jobs to our local residents with a living wage. These jobs give our children the opportunity to return home to live and work. These jobs also boost our local businesses and economy by fueling the circular flow of money in around the island. When the Kekaha plantation closed the sugar mill, many of the local residents were out of jobs and many west Kaua'i residents moved to the mainland or to the east side. Those that stayed in the west side found employment at PMRF. Also I have seen the military contribute their time, talents and treasures during hurricanes Iniki and Iwa by helping the local residents with distributing water, MRE's and other required necessities after both hurricanes. Secondly, PMRF and the Navy are community partners as they participate in many community events such as STEM nights at our west side schools, allow field trips for our students to visit the facility and learn about their operations, giving the next generation inspiration for a career pathway and hope for a better future. PMRF also hosts "Earthday", so the children can learn about marine life and conservation. They are also great partners by allowing the local residents a pass to go on base for recreation access at Majors Bay, Shennigans, the movies and other activities on base. Not to mention, this year, PMRF held the only July 4th celebration on the island free for the entire island community. Lastly, PMRF provides the protection to Kaua'i as well as Hawaii all of the Hawaiian islands we need being vulnerable to threats by foreign countries. The military presence has the equipment and technology to protect the people in Hawaii. In my opinion, PMRF is like the North Star of the west Kaua'i community as it has helped its residents and community find their way through trials and tribulations (hurricanes, recession and recovery) for many years. PMRF has been the stronghold of the west Kaua'i community and should remain at their present location for many years to come. Mahalo.

DEIS Comment Letter 0053

PMRF-1161 (Record 41 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Mary Lu	**Last Name** Kelley	**Mailing List** Yes	
Street 5465 Wailaau Road	**City** Koloa	**State** HI	**Zip** (none)
Email mkelley323@gmail.com		**Organization**	
Attachments (none)			
Comments Aloha. This is RE: the U.S. Navy's and the National Aeronautics and Space Administration's joint Draft Environmental Impact Statement for proposed lease renewal agreements on state-owned land on Kaua'i. My concerns include: 1. The Navy's draft document has significant lapses in its coverage of environmental impacts on the site, specifically the effects on marine ecosystems or the groundwater. 2. The Navy's exclusion of Rim of the Pacific (RIMPAC), the world's largest international maritime warfare exercise that is held biannually in Hawai'i. 3.The lack of clarity on the Navy's third "No Action Alternative," which outlines the potential impacts of the Navy not renewing its leases and vacating the site. 4. Deep concerns about the environmental impact of the Navy's weapons testing and missile launching initiatives over the years the test range has been in operation. Especially concerned now that SpaceX is going to land or crash their returning vehicles in the Pacific near Hawaii. 5. Particularly, the Navy's use of PFAs, or Per- and Polyfluoroalkyl Substances. 6. Increased bombing of Ka'ula. 7. General loss of my trust in the Navy after Red Hill on O'ahu and Pōhakuloa on the Big Island. Therefore, it's really important that this EIS have clarity and real integrity." Thank you. Do the right thing.			

PMRF-1163 (Record 40 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Shyanne	**Last Name** Olores	**Mailing List** Yes	
Street PO BOX 185	**City** Lawai	**State** HI	**Zip** (none)
Email officialshykane@gmail.com		**Organization**	

Attachments
Yes

- File Attachment: shyanne_olores_pmfr_testimony.docx

Comments
Written Testimony Opposing the Lease Renewal of PMRF Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi. I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our ʻohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military. Let me be absolutely clear: this is not America. These are stolen lands. Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied ʻāina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives. Over the past 7 years, seven members of my ʻohana from Mana and Kekaha have died from cancer. All of them worked in agriculture. We know this land has been poisoned. PFAS contamination has been documented at PMRF since the 1960s, and still — over 60 years later — the Navy has failed to clean it up. The Draft EIS casually states that "remediation is forthcoming," while Kanaka continue to die. That is environmental negligence and cultural violence. The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we've seen at Red Hill — and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future. The Draft EIS fails to account for the full mauka to makai impacts of PMRF operations. It ignores the destruction caused by rocket launches, amphibious assaults, live-fire drills, and ongoing military exercises such as RIMPAC. It completely omits the environmental

and cultural devastation these activities cause — not only on Kaua‘i, but globally, as PMRF supports the testing and export of weapons used in international conflict and genocide. I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS. We reject mitigation. We reject any expansion. We reject continued occupation. We demand that the United States:1. End the lease.2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste.3. Restore sacred sites, including the dunes at Nohili.4. Return all lands under PMRF to the rightful stewards — the Kanaka Maoli. PMRF is not defense. It is desecration. And we will not stand by while our ‘āina, our culture, and our families are poisoned in the name of war and profit. This is not America. This is Hawai‘i. And the U.S. military must get out. Mahalo for receiving this testimony. I do not stand alone. Me ka ‘oia‘i‘o,Shyanne Olores

DEIS Comment Letter 0054

Written Testimony Opposing the Lease Renewal of PMRF

Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi.

I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our ʻohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military.

Let me be absolutely clear: this is not America. These are stolen lands.

Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied ʻāina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives.

Over the past 7 years, seven members of my ʻohana from Mana and Kekaha have died from cancer. All of them worked in agriculture. We know this land has been poisoned. PFAS contamination has been documented at PMRF since the 1960s, and still — over 60 years later — the Navy has failed to clean it up. The Draft EIS casually states that "remediation is forthcoming," while Kanaka continue to die. That is environmental negligence and cultural violence.

The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we've seen at Red Hill — and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future.

The Draft EIS fails to account for the full mauka to makai impacts of PMRF operations. It ignores the destruction caused by rocket launches, amphibious assaults, live-fire drills, and ongoing military exercises such as RIMPAC. It completely omits the environmental and cultural devastation these activities cause — not only on Kauaʻi, but globally, as PMRF supports the testing and export of weapons used in international conflict and genocide.

I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS.

We reject mitigation. We reject any expansion. We reject continued occupation.

We demand that the United States:
1. End the lease.
2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste.
3. Restore sacred sites, including the dunes at Nohili.
4. Return all lands under PMRF to the rightful stewards — the Kanaka Maoli.

PMRF is not defense. It is desecration. And we will not stand by while our ʻāina, our culture, and our families are poisoned in the name of war and profit.

This is not America. This is Hawaiʻi. And the U.S. military must get out.

Mahalo for receiving this testimony. I do not stand alone.

Me ka ʻoiaʻiʻo,
Shyanne Olores

DEIS Comment Letter 0055

Ronnie Inagaki <rinagaki69@gmail.com> 8/4/2025 8:27 PM

Public Comment – PMRF 2025 DEIS – Ronnie Inagaki

To info@pmrf-kpgo-eis.com Copy tia marie <tm.hawaiipeaceandjustice@gmail.com>

Subject: Public Comment – PMRF 2025 DEIS – Ronnie Inagaki

Aloha,

Please accept the attached written testimony and reference appendix from myself, Ronnie Inagaki regarding the 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF), Mānā, Kauaʻi.

My testimony details significant legal, environmental, and cultural concerns about the DEIS and requests that it be withdrawn or substantially revised. The testimony is accompanied by a reference list documenting cited evidence and supporting resources.

Please confirm receipt of this submission.
Mahalo for your attention and consideration.

Sincerely,
Ronnie Inagaki

Attachments:

1. Written Testimony – Ronnie Inagaki – PMRF 2025 DEIS and Appendix – References & Supporting Evidence.

- Public Comment _ PMRF 2025 DEIS - Mānā^J Kauaʻi _ Ronnie Inagaki.pdf (175 KB)

DEIS Comment Letter 0055

Written Comment on the 2025 Draft Environmental Impact Statement
Pacific Missile Range Facility (PMRF), Mānā, Kauaʻi

Submitted by: Ronnie Inagaki
Date: August 4, 2025

To Whom It May Concern,

I submit this testimony in direct response to the 2025 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Navy and NASA regarding activities at the Pacific Missile Range Facility (PMRF) in Mānā, Kauaʻi. I find the DEIS incomplete, inadequate, and deeply flawed in both legal standing and cultural impact analysis. The proposed actions must be halted, and the DEIS withdrawn or significantly revised.

---

1. Legal Status of the Lands – Seized, Not Ceded

The DEIS repeatedly refers to the subject lands as "ceded." This classification is factually and legally false. These lands were seized without consent or lawful treaty of annexation and remain under illegal military control. The Hawaiian Kingdom was recognized as a sovereign nation by the U.S. and many other countries, and no lawful transfer of its national lands has ever occurred.

Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S. Constitution's recognition of treaties as the supreme law of the land (Article VI). As recognized by U.S. Public Law 103-150 (the "Apology Resolution"), the overthrow of the Hawaiian Kingdom was illegal and occurred "without the consent of or compensation to the Native Hawaiian people or their sovereign government" (103rd Congress, 1993)[Appendix:1].

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2. Failure to Adequately Document or Disclose Pollution Events

The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with verifiable, public-facing documentation:

- **Perchlorate contamination** from solid rocket fuel used in missile launches and related propulsion testing is a well-known environmental hazard. The U.S. Environmental Protection Agency (EPA) identifies perchlorate as a threat to drinking water and human health, especially for pregnant women and children.[Appendix:3]
- **PFAS contamination**, especially in light of the known airplane fire incident at PMRF in 2020, has been reported in "Toxic Foam from Military Fire Training Raises Concerns on Kauaʻi" (Honolulu Civil Beat, 2021)[Appendix:2].
- The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials, are not adequately disclosed.

Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?

---

3. Inadequate Cultural Impact Assessment

The cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including:

- Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades, as documented by the State Historic Preservation Division (SHPD) and local practitioners[Appendix:4].
- Leina a ka ʻuhane (leaping places of the soul), which are located in proximity to PMRF training zones.
- Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access.
- Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity.

Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "paʻakai analysis" (as required under Hawaiʻi's environmental review framework) cannot be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.

---

4. Incomplete and Inadequate Analysis – Environmental and Procedural Deficiencies

This DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include:

- No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors.
- No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region.
- No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities, especially children living near military activity zones.
- No generational impact assessment on future health, land use, or cultural restoration.

This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory[Appendix:5,6,7].

---

5. Conclusion and Demands

This land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestors. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us, it harms us, visibly and invisibly.

The Navy and NASA must:

1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures.
2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments.
3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners.

4. Acknowledge the land as Hawaiian national land seized without consent and stop referring to it as "ceded."
5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established.

Mahalo for your time. Know that this testimony is not only for today, but for the next seven generations.

Ronnie Inagaki
Email: rinagaki69@gmail.com

Appendix: References & Supporting Evidence

1. U.S. Public Law 103-150 (1993) ("Apology Resolution"):
Official acknowledgment by the U.S. Congress that the Hawaiian Kingdom was overthrown with the active participation of the United States, and that Native Hawaiians never relinquished claims to their inherent sovereignty or national lands.
[Full Text: https://www.govinfo.gov/content/pkg/STATUTE-107/pdf/STATUTE-107-Pg1510.pdf]

2. PFAS Contamination:
"Toxic Foam from Military Fire Training Raises Concerns on Kauaʻi." *Honolulu Civil Beat*, April 29, 2021.
[https://www.civilbeat.org/2021/04/toxic-foam-from-military-fire-training-raises-concerns-on-kauai/]

3. Perchlorate in Drinking Water:
U.S. Environmental Protection Agency (EPA) – Basic Information about Perchlorate in Drinking Water.
[https://www.epa.gov/sdwa/perchlorate-drinking-water]

4. State Historic Preservation Division (SHPD):
Reports and documentation on the presence and disturbance of iwi kūpuna in the Mānā dunes.
[Contact: Hawaiʻi State Historic Preservation Division, https://dlnr.hawaii.gov/shpd/]

5. National Environmental Policy Act (NEPA):
Requires federal agencies to assess environmental effects, including cultural impacts and

meaningful public input.
[https://www.energy.gov/nepa/national-environmental-policy-act-nepa]

6. Hawai‘i Revised Statutes Chapter 343:
Establishes Hawai‘i’s environmental review process and requirements for cultural impact assessment.
[https://dlnr.hawaii.gov/occl/files/2013/08/HRS-343.pdf]

7. United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP):
Articles 18 and 32 affirm rights to consultation, free prior and informed consent, and protection of traditional lands.
[https://www.un.org/development/desa/indigenouspeoples/declaration-on-the-rights-of-indigenous-peoples.html]

DEIS Comment Letter 0056

Michael Goodwin <goodwinkip@gmail.com> 8/4/2025 8:41 PM

PMRF Draft Environmental Impact Statement testimony

To info@pmrf-kpgo-eis.com

Dear Ms. Ling,

The Navy's draft Environmental Assessment in August 2024 proposed an acceleration of land based, multi-domain training and testing activities:

Drone operations from two to 45 times annually.
Troop maneuvers over land, from one to 22 times.
Amphibious operations, four to 26.
Helicopter and Osprey landing zone operations, four to 26.
Operating, arming, and refueling for fighter jets, helicopters, planes and Ospreys, one to 20.

These activities and more are proposed to be undertaken by all US military branches and include foreign militaries.

This draft EIS does not comprehensively break down anticipated environmental impacts for these intensified activities based on the known accumulated impacts from decades of environmental degradations and cultural disruptions due to access restrictions. The EIS says that these proposed testing and training activities "were not being supported at other locations", which is another way of saying the Navy has designated Kaua`i to be the de facto repository for inevitable harmful environmental effects that have been rejected in protest by other islands.

We have a particular concern that the MD-22 Osprey transport aircraft might gain a permanent presence on Kaua`i with this proposal that it participate in take off, landing and refueling exercises. The Osprey has an alarming history of crashing, causing the death of 62 service personnel since becoming operational in 2007. If one of these aircraft crashed on the flank of Mt Wai`ale`ale or in near shore water, it strains credulity to think that the military could or would clean up and thoroughly restore the crash site. Kauai's remote location on the map should exclude Kaua`i from being a deployment destination.

Kaua`i enjoys for the most part an unspoiled natural environment but that is beset with challenges on several fronts. Whatever benefits can be derived from the actions proposed in this EIS are outweighed by the need to preserve the natural and economic benefits of, as the local saying goes, keeping Kaua`i Kaua`i.

We prefer the No Action Alternative.

Kip Goodwin
Wailua Homesteads, Kaua`i

DEIS Comment Letter 0057

ZAC Appleton <appleton.zac@epa.gov> 8/5/2025 7:53 PM

EPA Comment Letter: Pacific Missile Range Facility DEIS

To William.Manley.civ@us.navy.mil <william.manley.civ@us.navy.mil> • info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> Copy Shari.A.Miller@nasa.gov <shari.a.miller@nasa.gov>

If you have any questions over EPA's comment letter, feel free to contact me directly.

Thanks,

Zac Appleton

NEPA Reviewer

U.S. Environmental Protection Agency, Region 9
Environmental Review Section – Transportation Team

75 Hawthorne Street, CED 2-2

San Francisco, CA 94105

Phone: 415-972-3321

- 2025-08-5_EPA DEIS Comments_PMRF+KPGO Real Estate (2025083)_signed.pdf (307 KB)

DEIS Comment Letter 0057

REGION 9
SAN FRANCISCO, CA 94105

August 5, 2025

William Manley
Project Manager
Naval Facilities Engineering Systems Command
400 Marshall Road
Pearl Harbor, Hawai'i 96860

Subject: EPA Comments for the Draft Environmental Impact Statement for the Pacific Missile Range Facility and Kōke'e Park Geophysical Observatory Real Estate Agreement, Kauai, Hawaii (CEQ# 20250083)

Dear William Manley:

The U.S. Environmental Protection Agency has reviewed the above-referenced document. We are providing comments pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to the EPA. It requires EPA to review and comment publicly on any proposed federal action subject to NEPA's environmental impact statement requirement and to make its comments public.

The U.S. Navy and the National Aeronautics and Space Administration prepared a Draft Environmental Impact Statement to evaluate the potential environmental impacts of the proposed real estate agreements with the State of Hawai'i for the Pacific Missile Range Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO) project. The Navy proposes to retain the use of 8,172 acres of State lands on Kaua'i for operational continuity and sustainment of the PMRF, including military training, testing, and facility operations. The continued long-term NASA use of 23 acres of State lands would be in support of continued KPGO operations.

Review Summary

The EPA provided scoping comments on June 17, 2024, with recommendations for the preparation of this DEIS, and we note those recommendations were fully adopted in the DEIS. The DEIS is primarily a disclosure document for a real estate action to be negotiated with the State of Hawai'i. EPA did not identify significant public health, welfare, or environmental quality concerns, and appreciates the robust cultural resource analysis and commitments made for Native Hawaiian communities accessing cultural practices in the project area. For your consideration, we recommend continuous coordination

with the state and county to enhance shoreline resilience[1] in both the project area and coastline west of the Main Base.

The EPA appreciates the opportunity to review this DEIS. When the Final EIS is released for public review, please notify use and make an electronic version available. If you have any questions, please contact me at (415) 947-4167 or contact Zac Appleton, the lead reviewer for this project, at (415) 972-3321 or appleton.zac@epa.gov.

Sincerely,

Jean Prijatel
Branch Manager

cc: Shari Miller
National Aeronautics and Space Administration

[1] U.S. Army Corps of Engineers, Engineering With Nature website. Available: https://ewn.el.erdc.dren.mil

DEIS Comment Letter 0058

Beth Ullman <bethullman@gmail.com> 8/5/2025 8:50 PM

Navy land leases on Kauaʻi

To info@pmrf-kpgo-eis.com

Please do NOT renew or apply to renew military leases on Kauaʻi! Let us try to salvage what we can of our planet, and stop doing damage. As a Navy "brat" I have seen the damage done by our military when I lived on Guam, many visits to Hawai'i, and on Wake Island. It needs to stop.

Thank you.

Elizabeth Ullman
California

DEIS Comment Letter 0059

Therese Eke <thereseeke@me.com> 8/5/2025 9:35 PM

No to 30 year leases on Kuaui

To info@pmrf-kpgo-eis.com

Stop the U.S. Navy and NASA from ANY leases on Hawaiian land, including Kuaui.

The ONLY thing the U.S. Navy and NASA should be doing is remediating the damage they have already done.

Stop the militarization, the environmental racism and the trampling of Kanaka Maoli.

Preserve what's left of the wildlife, land, water and air before it is too late.

As a concerned taxpayer, citizen, and human living on the earth, Therese Eke

Sent from my iPhone

DEIS Comment Letter 0060

Virginia Feldman <feldmanvi@gmail.com> 8/5/2025 10:06 PM

No new leases

To info@pmrf-kpgo-eis.com

Dear Ms, Ling, and the Pacific Missile Range Facility/Koke'e Park Geophysical Observatory:

Justice requires that the U.S. Navy and NASA **NOT** get a new 30-year lease for the over 8,000 acres of stolen Hawaiian lands on Kaua‘i. They've occupied these lands for decades at the Pacific Missile Range Facility (PMRF) and Kōke‘e Park Geophysical Observatory (KPGO).

Their recently released Draft Environmental Impact Statement (EIS)
fails to account for the full scope of harm to ‘āina (land and waters), including:

- Ongoing damage to land, water, and ocean ecosystems
- Threats to endangered species and sacred sites
- Lack of analysis on climate change impacts or long-term community health
- Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration

This is about continued militarization, environmental racism, and the denial of Kanaka Maoli sovereignty.

We friends of Kanaka Maoli demand**:** No new leases.
Accountability for environmental and cultural harm.
Comprehensive cleanup and restoration, and
Return of ‘āina to Kanaka Maoli

THANK YOU for your attention,
Virginia Feldman

DEIS Comment Letter 0061

Kaleiheana-A-Pohaku Stormcrow <kstormcr@hawaii.edu> 8/5/2025 11:22 PM

End Military Leases for PMRF and KPGO

To info@pmrf-kpgo-eis.com

Aloha mai kākou,

I am writing to urge you to deny new military leases for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Geophysical Observatory. The Draft EIS does not account for the full scope of environmental and cultural harm: threats to endangered species, sacred sites, climate change impacts (which are likely significant), or health consequences for nearby communities. Please take this opportunity to take accountability for cultural and environmental harm, fully restore the land, cleanup the mess, and return this land to Kānaka for stewardship.

These lands are stolen. As a Kanaka ʻŌiwi, I do not consent to the continued desecration of ʻāina, ancestors, and communities (people, plant, animal).

Mahalo for your time and the opportunity to submit testimony.

ke aloha,
--
Kaleiheana-a-Pōhaku Stormcrow
Master of Science
Department of Natural Resources and Environmental Management
University of Hawaiʻi Mānoa
pronouns: they/them

DEIS Comment Letter 0062

Kaleiheana-A-Pohaku Stormcrow <kstormcr@hawaii.edu> 8/5/2025 11:22 PM

End Military Leases for PMRF and KPGO

To info@pmrf-kpgo-eis.com

Aloha mai kākou,

I am writing to urge you to deny new military leases for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Geophysical Observatory. The Draft EIS does not account for the full scope of environmental and cultural harm: threats to endangered species, sacred sites, climate change impacts (which are likely significant), or health consequences for nearby communities. Please take this opportunity to take accountability for cultural and environmental harm, fully restore the land, cleanup the mess, and return this land to Kānaka for stewardship.

These lands are stolen. As a Kanaka ʻŌiwi, I do not consent to the continued desecration of ʻāina, ancestors, and communities (people, plant, animal).

Mahalo for your time and the opportunity to submit testimony.

ke aloha,
--
Kaleiheana-a-Pōhaku Stormcrow
Master of Science
Department of Natural Resources and Environmental Management
University of Hawaiʻi Mānoa
pronouns: they/them

DEIS Comment Letter 0063

Sarah Westwind <silvermaple218@gmail.com> 8/6/2025 9:05 AM

public comment regarding Kaua'i

To info@pmrf-kpgo-eis.com

No new leases

Accountability for environmental and cultural harm

Comprehensive cleanup and restoration

Return of ʻāina to Kanaka Maoli

Respectfully,

Sarah Westwind

DEIS Comment Letter 0064

PMRF-1165 (Record 39 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Edward	**Last Name** Tripp	**Mailing List** No	
Street 301 Market Street	**City** Apalachicola	**State** FL	**Zip** (none)
Email eltripp@gmail.com		**Organization**	
Attachments (none)			
Comments The US Navy has a solid record of environmental damage, pretty much wherever it goes and does what it wants to do. There is nothing good that can come of the US Navy's continued presence in Hawaii, not as long as it acts without regard for the external world.			

DEIS Comment Letter 0065

PMRF-1166 (Record 38 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Bruce	**Last Name** Wade	**Mailing List** Yes	
Street 1204 S. 18 St.	**City** Mount Vernon	**State** WA	**Zip** (none)
Email activist@taurus-tech.net		**Organization**	
Attachments (none)			
Comments In light of the environmental damage and ongoing disruption of the habitats and flora, I oppose any continued use of the Kaua‘i lands for military tests and operations. Kaua‘i is considered one of the most unspoiled and natural islands and every effort should be to retain and recover its lands to their natural balance of flora and fauna.			

PMRF-1167 (Record 37 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Riyaana	**Last Name** Hartley	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments This lease should be terminated and never renewed. This land was stolen and misused, leaving the land, ocean, animals and native people significantly harmed. No agenda is worth the continued damage and desecration of the natural inhabitants. This is an opportunity to do the right thing, make amends and set balance into motion. If not, the misguided, malicious and egotistical objectives of the US govt etch a legacy of pure destruction and disregard for life into eternity.			

DEIS Comment Letter 0067

PMRF-1168 (Record 36 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Joshua	**Last Name** Reichek	**Mailing List** No	
Street (none)	**City** (none)	**State** CA	**Zip** (none)
Email reichek@dslextreme.com		**Organization**	
Attachments (none)			
Comments Please --- No new leases Please provide accountability for environmental and cultural harm Please provide a plan and time line for comprehensive cleanup and restoration Please provide time line for the return of ʻāina to Kanaka Maoli			

DEIS Comment Letter 0068

PMRF-1169 (Record 35 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Patti	**Last Name** Gmeiner	**Mailing List** Yes	
Street 1617 River Street	**City** Niagara	**State** WI	**Zip** (none)
Email pattilanegmeiner@aol.com		**Organization**	
Attachments (none)			
Comments These are not my own words, but I agree with them: The Draft EIS fails to account for the full scope of harm to ʻāina (land and waters), including: Ongoing damage to land, water, and ocean ecosystems Threats to endangered species and sacred sites Lack of analysis on climate change impacts or long-term community health Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration. Please: -- No new leases -- Accountability for environmental and cultural harm -- Comprehensive cleanup and restoration -- Return of ʻāina to Kanaka Maoli			

DEIS Comment Letter 0069

PMRF-1170 (Record 34 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Alvin	**Last Name** Deer	**Mailing List** Yes	
Street 616 SW 70th Street	**City** Oklahoma City	**State** OK	**Zip** (none)
Email alvindeer@yahoo.com		**Organization**	
Attachments (none)			
Comments The state already recognized that it was stolen land in 1996 when they canceled the 100th anniversary of occupation of Hawaii. The native Hawaiians have never given up their sovereignty and we must support their rights to the sacred land			

DEIS Comment Letter 0070

PMRF-1171 (Record 33 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Lauren	**Last Name** Johnson	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments The DEI does not sufficiently cover ongoing damage to land, water, and ocean ecosystems or threats to endangered species and sacred sites. This includes continued desecration and occupation of indigenous Kānaka Maoli lands without return, reparations, or restoration. Nor does the DEI sufficiently analyze the impacts on climate change or long-term community health.			

PMRF-1172 (Record 32 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Gabrielle	**Last Name** Holt	**Mailing List** No	
Street (none)	**City** (none)	**State** HI	**Zip** (none)
Email ahulii.holt@gmail.com		**Organization**	
Attachments (none)			

Comments

I am writing to express my complete opposition to the continued use of state lands on Kaua'i for the Pacific Missile Range Facility (PMRF). As a Native Hawaiian, I oppose it on spiritual and cultural grounds, and as a human being invested in a livable future for generations to come, I oppose it on the grounds that the military has never, in the history of Hawai'i, been a responsible steward of the lands they have leased and abused for over 100 years. From Pu'uloa, to Pohakuloa, to Kaho'olawe and beyond - how much more can our island home take? The lack of transparency regarding the Red Hill water crisis eroded what was already a tenuous trust (at best), while the proposed "boosting of training" at Ka'ula demonstrates a willful disrespect for all facets of life in Hawai'i. On July 23rd, the International Court of Justice "ruled that States have an obligation to protect the environment from greenhouse gas (GHG) emissions and act with due diligence and cooperation to fulfill this obligation." A continued military presence, with all the pollution it brings with it, flies in the face of this ruling. The US military is one of the biggest sources of carbon emissions in the world (estimated to be about 3,685 Million Metric Tons of CO2 equivalent in November 2024). This, along with the other damaging aspects of a military presence (water pollution, noise pollution, radiation, etc.) are not conducive to a sustainable environment. In the context of Hawai'i, the "extinction capital of the world", this is particularly damning. As an educator, I am deeply invested in the future that my beloved students will inherit. What kind of world do I want them to emerge into? What kind of caretaker would I be if I did not speak up for them and their 'āina? It is with the deepest love for them, and my home, that I must fervently oppose any continued use of the land on Kaua'i by the US Military. As George Helm once said: "What is national defense when what is being destroyed is the very thing the military is being entrusted to defend, the sacred land?" As a Hawaiian, I have been entrusted with the kuleana to speak up for my 'āina and for those future generations from whom we are borrowing it, a hiki i ka aloha 'āina hope loa. I thank you for your time and consideration.

DEIS Comment Letter 0072

PMRF-1173 (Record 31 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Beth	**Last Name** Goodson	**Mailing List** Yes	
Street 359 7th Ave	**City** San Francisco	**State** CA	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments The Draft EIS fails to account for the full scope of harm to ʻāina (land and waters), including: Ongoing damage to land, water, and ocean ecosystems Threats to endangered species and sacred sites Lack of analysis on climate change impacts or long-term community health Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration This is not just about environmental review. It is about continued militarization, environmental racism, and the denial of Kanaka Maoli sovereignty.			

PMRF-1174 (Record 30 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Sharon	**Last Name** Furlong	**Mailing List** Yes	
Street 133 e. Bristol road	**City** Feasterville	**State** PA	**Zip** (none)
Email sfurlong5@verizon.net		**Organization** Bucks Environmental Action	
Attachments (none)			
Comments It seems that accumulating effects, especially in the world of environmental analysis, never seem to take the lead .indeed, it rarely seems Ro get a seat at the table at all. This project not only does not take into consideration any harms that have already been done, and will continue to be done, to the air, water and soil in this fragile area, it seems to be dismissive of the issue at all. To be expected, but infuriating, and deadly, nevertheless. In addition , there is the small consideration of the continuing desecration of sacred lands, along with once again, the dismissal of the Indigenous People for whom these lands are sacred. Hmmm…I wonder what wouls happen if St. Patrick's Cathedral was slated to be occupied and explored for mining?? The racism is palpable.			

DEIS Comment Letter 0074

PMRF-1175 (Record 29 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Brandon	**Last Name** Trelstad	**Mailing List** No	
Street 603 NW 29th St	**City** Corvallis	**State** OR	**Zip** (none)
Email bltrelstad@gmail.com		**Organization**	
Attachments (none)			
Comments I'm writing with concerns about the US government (Navy and NASA) seeking new leases for over 8,000 acres of stolen Hawaiian lands at the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO). The Draft Environmental Impact Statement (DEIS) fails to assess the full scope of harm to land, water, ocean, endangered species, sacred sites, address climate change, and the human health. One of a kind habitats are harmed by rocket launches that ignite vegetation, amphibious assaults that disturb the shoreline, and warships and sonar that disrupt fragile ocean ecosystems. The Navy refuses to promise cleanup. The DEIS admits that cleanup is “unknown” and instead says they’ll “negotiate” with the state, leaving toxic waste, landfills, unexploded ordinances, and abandoned military structures to desecrate the land indefinitely. Please do not allow these activities on land that belongs to and has been cared for by the Hawaiian people. This is stolen land that should be protected and left to Hawaiian management.			

DEIS Comment Letter 0075

Regina Gregory <reginagregory24@gmail.com> 8/6/2025 3:35 PM

pmrf eis

To info@pmrf-kpgo-eis.com Copy info@earthjustice.org

Adding the words "real estate" does not eliminate the far-reaching harms caused by operating a missile test facility.

Please choose the "no action" alternative.

Regina Gregory

DEIS Comment Letter 0076

Shannon Sitzler <shann161999@gmail.com> 8/6/2025 4:54 PM

Naval facilities engineering systems command , environmental OPHEv2

To info@pmrf-kpgo-eis.com

Ms. Kerry Ling,
I am dis hearted to hear about the new lease of land the military stole out right from the Kauai residents. This land should be classed as kapu. It is sacred land that should only be utilized for the public. Our community demands no new leases and a full cleanup and restoration to the land.

DEIS Comment Letter 0077

PMRF-1176 (Record 28 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Denver	**Last Name** West	**Mailing List** No	
Street (none)	**City** Honolulu	**State** (none)	**Zip** (none)
Email cheapyxo1@gmail.com		**Organization**	
Attachments (none)			
Comments Aloha Kakou, I am writing to express my strong opposition to the proposed new leases and to voice my deep concern regarding the Draft Environmental Impact Statement (EIS) for the Pacific Missile Range Facility (PMRF) and KPGO. The Draft EIS fails to fully address the environmental, cultural, and health harms that have long impacted the land, ocean, and communities of West Kauaʻi. It overlooks the damage to endangered species and sacred sites, and completely omits analysis of climate change, long-term health consequences, and cumulative impacts on Native Hawaiian lands. I urge you to: • Deny any new leases • Acknowledge and address the environmental and cultural harm • Commit to full cleanup and restoration • Return ʻāina to Kānaka Maoli Mahalo for your time and consideration. Sincerely, Denver West 96815			

DEIS Comment Letter 0078

PMRF-1177 (Record 27 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name georgia	**Last Name** anders	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments Due to the climate changes effects and the distraction of Hawaiian land I sign this.			

DEIS Comment Letter 0079

PMRF-1178 (Record 26 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Julie	**Last Name** Morcate	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments The Draft EIS fails to account for the full scope of harm to ʻāina (land and waters), including: Ongoing damage to land, water, and ocean ecosystems Threats to endangered species and sacred sites Lack of analysis on climate change impacts or long-term community health Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration Please stop the militarization, environmental racism, and the denial of Kanaka Maoli sovereignty.			

DEIS Comment Letter 0080

PMRF-1179 (Record 25 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Kahakuhailoa	**Last Name** Poepoe	**Mailing List** No	
Street 27-2056	**City** Papaikou	**State** HI	**Zip** (none)
Email backupkahaku@gmail.com		**Organization**	
Attachments (none)			
Comments I strongly oppose the U.S. Navy's request to extend their lease at the PMRF also known as Barking Sands on the West Side of Kauaʻi. This lease violates multiple laws and statutes protecting Native Hawaiian rights that the U.S. Federal government is required to uphold and maintain, including but not limited to, gathering rights, cultural access rights, and the Federal Government's requirement to consult with Native Hawaiian communities before undergoing any projects in Hawaiʻi. Nōhili, as this place is traditionally known as in the Hawaiian language, holds significant importance as expressed in hundreds of Hawaiian songs and chants which can be found in the Papakilo Database's Hawaiian Newspaper Collection, as well as mentions in traditional moʻolelo and stories in said sources and found in various oral traditions. It is vital that Native Hawaiians have cultural access to Nōhili, and that the U.S. military clean up the mess it has already made at Nōhili. Me ke aloha pumehana, na Kahakuhailoa			

PMRF-1180 (Record 24 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Joell	**Last Name** Edwards	**Mailing List** Yes	
Street 5-6607 Kuhio Highway	**City** Hanalei	**State** HI	**Zip** (none)
Email joellmedwards@gmail.com		**Organization** Wainiha Country Market Inc	
Attachments Yes • File Attachment: pmrf_draft_eis_testimony_j_edwards.pdf			
Comments Please see my public testimony			

DEIS Comment Letter 0081

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

My name is **Joëll M. Edwards**, and I am a resident of **Wainiha, Kaua‘i**. I respectfully submit the following testimony in response to the Draft Environmental Impact Statement (DEIS) regarding the continued military use of public lands at the Pacific Missile Range Facility (PMRF) and KPGO.

As a resident of Kaua’i,, I am deeply concerned about the cumulative environmental, cultural, and social impacts that have been inadequately addressed in the DEIS. The current draft omits critical data, avoids clear accountability, and fails to offer meaningful community benefits or restoration.

Key Areas of Concern:

- **Fuel Storage & PFAS:** The DEIS confirms the presence of fuel storage and historic PFAS use but lacks transparency on quantities, compliance records, or cleanup plans. This echoes the crisis at Red Hill. I urge the Navy to disclose storage volumes, conduct complete PFAS investigations, and implement emergency response protocols.

- **Stormwater & Landfill Runoff:** The DEIS acknowledges pollution concerns near the Mānā Plain drainage ditches, yet disclaims responsibility. If PMRF operates adjacent to discharge points, it must partner with the County and State for full water quality monitoring and cleanup.

- **Unexploded Ordnance (UXO):** There is no plan for proactive removal or community safety despite admitted UXO risks. A full risk map and a public safety plan should be required before lease renewal.

- **Ka‘ula Island & RIMPAC:** The continued bombing of Ka‘ula Island, a sacred and ecologically sensitive site, is unacceptable. RIMPAC activities likewise cause measurable harm to marine mammals and ocean ecosystems. These actions are incompatible with Hawai‘i’s cultural and environmental values.

- **Wetlands & Restoration:** The Navy offers no commitment to restore wetlands near PMRF despite degraded conditions. Other former military sites across the U.S. have successfully transitioned into conservation and community spaces—Kaua‘i deserves the same.

- **Biosecurity & Invasive Species:** The DEIS lacks any formal plan for Coconut Rhinoceros Beetle (CRB) monitoring or mitigation. This omission places our native and cultural plants at grave risk. A dedicated biosecurity program must be included.

- **Housing & Displacement:** The DEIS ignores the impacts of military presence on housing availability and affordability. Service member housing allowances are outpacing local incomes, displacing families and weakening community stability. The Navy must address this through land return and investment in local housing solutions.

- **Shared EIS ≠ Shared Responsibility:** While the Navy and NASA share some infrastructure, their missions and impacts are distinct. A joint EIS blurs accountability and complicates community oversight. Each agency should have separate environmental reviews, stewardship plans, and community obligations.

In Conclusion:

The people of Kauaʻi are not asking for favors—we are asking for **kuleana**. True stewardship requires more than vague promises. It demands:

- Cleanup of contaminated and UXO-impacted areas
- Restoration of wetlands and native habitats
- Transparent biosecurity protocols
- Investment in housing, public health, and environmental justice
- Cultural accountability for lands like Kaʻula and shorelines impacted by military use

Please revise the Final EIS to reflect these needs. Lease renewals must not proceed without binding commitments to protect the land, the ocean, and the people who call this place home.

Mahalo for your consideration,

Joëll M. Edwards
joelledwards@email.com
808-482-7852

DEIS Comment Letter 0082

PMRF-1181 (Record 23 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Leah	**Last Name** Miller	**Mailing List** Yes	
Street 2878 Pua Nani St	**City** Lihue	**State** HI	**Zip** (none)
Email millerleah17@gmail.com		**Organization**	
Attachments (none)			
Comments Please accept this as my personal testimony and comments regarding the US Navy Draft Environmental Impact Statement (Draft EIS) on proposed retention of 8,195 acres of stolen Hawaiian Kingdom lands in Mānā, Nohili, Koke'e, and surround areas ma uka to ma kai. Endangered Species Are at Risk. Endangered, native, and endemic species (our non Human relatives) like the honu, monk seals, native birds, native flies, and plants live on Navy-controlled lands and nearby waters. Their habitats are harmed by rocket launches that ignite vegetation, amphibious assaults that disturb the shoreline, and warships and sonar that disrupt fragile ocean ecosystems. Stolen Hawaiian Lands. The Navy falsely claims these are “ceded” lands, ignoring that Kanaka Maoli never consented to the U.S. takeover of Hawaiian Kingdom Crown and Government Lands. These are unceded, illegally occupied Hawaiian lands — and the DEIS erases that truth to justify continued military control. Mahalo for your time.			

DEIS Comment Letter 0083

PMRF-1182 (Record 22 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Steven	**Last Name** Pereira	**Mailing List** Yes	
Street 3635 Uwao St.	**City** Hanapepe	**State** HI	**Zip** (none)
Email steven.pereira1.civ@us.navy.mil		**Organization**	
Attachments (none)			

Comments

I support the mission and benefits that PMRF and KGPO operations currently provide for Kauai, the State of Hawaii, and our nation, and I fully endorse alternative #1, long term continued leasing and easements with DLNR and the State of Hawaii. I was born and raised on Kauai and lived here my entire life except for a 3-yr enlistment in the Army and time away at college. When I returned from college in 1994 with my degree in Electrical Engineering, I could not find a job. Kauai Electric (at the time), Hawaiian Telephone, County of Kauai, State of Hawaii, and all the private businesses I sought employment with weren't hiring. After 5 months of looking and waiting, my phone rang. It was the Navy calling, asking if I was interested in an engineering position in the PMRF Public Works Office. Immensely relieved, I took that job offer and have been at PMRF ever since. I am forever grateful for PMRF given me the chance to remain at home on Kauai and earn a living for family and myself. I am retirement eligible now and passed up on the Deferred Resignation Program offer that was extended to federal employees in March. Taking the offer meant that the engineering billet I currently occupy would be abolished, in all likelihood, and Kauai would have one less opportunity for a young engineering graduate returning home, in finding employment on Kauai, like I did some 30 years ago. I will work until the end of the year, then retire, somewhat reluctantly, because the work at PMRF has been fulfilling. I am hopeful federal hiring restrictions will ease up before I retire and PMRF may be able to hire that young engineer returning home, whom I would enjoy mentoring to take my place when I finally move on to a life of leisure and fishing; along a shoreline at PMRF I might add, where that opportunity exists because of the great relations and openness the base strives to have with the community. There are so many other great things that PMRF and KPGO do to benefit the community; I hope that people take the opportunity to read about those in this EIS. I'd like to conclude by mentioning what was one of the major highlights in my career: the opportunity to be a part of the Navy's Enhanced Use Lease team and a partner to KIUC's construction of a new distribution substation at Barking Sands, and their AES power partner's construction of the large PV and battery energy storage site on base. People may have read about it in KIUC's Currents

magazine and be familiar with these additions to the island grid, or perhaps many may have caught eye of them while driving along Kaumualii Hwy near mile marker 30, but many may not be familiar with the benefit that was realized from it during the 2024 Kamuakani wildfires. While fields were burning and KIUC was planning the shutdown of power transmission lines feeding the westside as a preemptive protective measure, collaborative discussions were struck between KIUC, AES, and PMRF about use of the PV and batteries on the base for keeping critical facilities on the west side powered-up in the event of the transmission lines shutdown. With the fires closing in on those powerlines, KIUC implemented their shutdown, configured circuits, and the PV and batteries at PMRF began serving the critical west side facilities, including KVMH and the emergency center setup in Waimea for the populace evacuating the wildfire areas.

DEIS Comment Letter 0084

PMRF-1183 (Record 21 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Fern	**Last Name** Holland	**Mailing List** Yes	
Street 4396 Rice St	**City** Lihue	**State** HI	**Zip** (none)
Email fholland@kauai.gov		**Organization**	
Attachments Yes • File Attachment: 2025-0805_cm_holland_testimony_on_pmrf___kpgo_draft_eis.pdf			
Comments Submitting testimony as an individual member of the Kauai County Council.			

DEIS Comment Letter 0084

COUNTY COUNCIL
Mel Rapozo, Chair
KipuKai Kualiʻi, Vice Chair
Addison Bulosan
Bernard P. Carvalho, Jr.
Felicia Cowden
Fern Holland
Arryl Kaneshiro

OFFICE OF THE COUNTY CLERK

Jade K. Fountain-Tanigawa, County Clerk
Lyndon M. Yoshioka, Deputy County Clerk

Telephone: (808) 241-4188
Facsimile: (808) 241-6349
Email: cokcouncil@kauai.gov

Council Services Division
4396 Rice Street, Suite 209
Līhuʻe, Kauaʻi, Hawaiʻi 96766

August 5, 2025

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attention: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860
Via Email Only: info@PMRF-KPGO-EIS.com

Dear Ms. Ling,

RE: TESTIMONY ON DRAFT ENVIRONMENTAL IMPACT STATEMENT (EIS) FOR PROPOSED, CONTINUED USE OF STATE LANDS ON KAUAʻI FOR THE NAVY'S PACIFIC MISSILE RANGE FACILITY AND NASA'S KŌKEʻE PARK GEOPHYSICAL OBSERVATORY

In my capacity as an individual member of the Kauaʻi County Council, please accept the attached testimony on the draft EIS for the proposed continued use of State lands on Kauaʻi for the U.S. Navy's Pacific Missile Range Facility and the Kōkeʻe Park Geophysical Observatory.

Please do not hesitate to contact me or the Office of the County Clerk, Council Services Division at (808) 241-4188 should you have any questions.

Sincerely,

FERN HOLLAND
Councilmember, Kauaʻi County Council

LMY:
Attachment

Testimony from Kaua‘i County Councilmember Fern Holland on the PMRF/NASA Draft EIS

Executive Summary

- The DEIS must be comprehensive, including leased lands, surrounding areas, fee-simple parcels, and offshore impacts.
- Navy and NASA impacts should be separately evaluated for clear accountability.
- Urgent transparency and action are needed on fuel storage, PFAS contamination, and chemical management.
- The Navy must collaborate on cleanup of runoff and contamination from adjacent pesticide use and landfills.
- Unexploded ordnance risks require mapping, cleanup, and community safety planning before lease renewal.
- Wetland restoration and habitat protection must be actively pursued with local partnerships.
- Live-fire activities on culturally sensitive Ka‘ula Island must cease with plans for restoration and cultural stewardship.
- RIMPAC exercises cause predictable harm to marine ecosystems and must be suspended pending a full review.
- A dedicated biosecurity program is critical to manage invasive species like the Coconut Rhinoceros Beetle.
- The DEIS must acknowledge and mitigate the military’s role in Kaua‘i’s housing crisis and social displacement.
- Lease renewals should be conditioned on environmental cleanup and community-beneficial land restoration projects.
- The Department of Defense should support community healing programs, such as drug rehabilitation and transitional housing.
- True stewardship requires ending harmful chemical use, restoring wetlands, providing funds for landfill remediation, and addressing social inequities.

A. Introduction

Aloha and mahalo nui loa to the Kaua‘i Board of Land and Natural Resources, the U.S. Navy, NASA, and all agencies involved in the Pacific Missile Range Facility and Kaua‘i Test Facility operations. I recognize and appreciate the important roles the base plays in our community’s safety, economy, and technological advancement. I also honor the commitment of the Navy, NASA, and their staff to Hawaiian stewardship, and the respectful efforts made by lineal descendants and cultural practitioners to protect our sacred ‘āina, minimize environmental impacts, and give back to the community. It is in this spirit of mutual respect and kuleana that I submit my testimony for your consideration.

The Need for a Truly Comprehensive EIS

The Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF) and NASA's Kauaʻi Test Facility (KTF) must be genuinely comprehensive. It cannot limit its scope to only the leased lands or narrowly defined operational footprints. Instead, it must assess the full environmental and cultural impacts, including fee-simple parcels, surrounding lands, and offshore areas influenced by PMRF activities. Therefore, my comments as part of this testimony address the environmental concerns and suggestions I have much more broadly than the existing context of the current draft in the hope that these more widespread impacts will be considered moving forward.

Only through this holistic approach can the DEIS uphold environmental justice, respect Native Hawaiian kuleana, and ensure meaningful protection for Kauaʻi's unique ecosystems and communities. This includes addressing legacy contamination (even that of which is not directly caused by Navy and NASA activities), cultural stewardship, and the cumulative social effects of a long-standing military presence on Kauaʻi.

The DEIS focuses narrowly on leased lands and immediate project boundaries, ignoring the broader interconnected environmental and cultural systems of West Kauaʻi. A truly comprehensive EIS must:

- Include fee-simple parcels, adjacent lands, and offshore activities, especially where impacts flow across jurisdictional lines (such as the Mānā Plain drainage system).
- Evaluate cumulative and indirect impacts, not just isolated site-specific ones.
- Assess climate resilience, sea-level rise vulnerabilities, and long-term stewardship of sensitive coastal ecosystems.

The health of our ʻāina and kai cannot be compartmentalized. Federal use of Hawaiian lands carries deep responsibility to ensure a holistic environmental review that reflects cumulative and generational impacts.

Problems with Combining Navy and NASA in One EIS

While the DEIS merges Navy and NASA operations into a single document for "efficiency," I think it is important to note that while there are shared resources this does not necessarily mean shared kuleana or accountability. If the full context of the impacts associated

- The Navy's live-fire and sonar testing have direct impacts on marine life and cultural sites, whereas NASA's satellite tracking and communications raise distinct concerns like electromagnetic emissions.
- A joint EIS risks blurring responsibility, making it harder to hold either agency accountable for contamination or damage.
- Community members deserve clarity: each agency must have its own environmental review, accountability channels, and community engagement.

Recommendation:

The Final EIS should clearly separate Navy and NASA impacts, require distinct accountability and cleanup pathways, and consider a standalone EIS for NASA if operations expand.

B. Environmental Impacts and Considerations

1. Fuel Storage, Chemical Management, and PFAS Concerns

The Draft Environmental Impact Statement (DEIS) references the presence of fuel storage infrastructure, including aboveground and underground tanks used for Jet Propellant-8 (JP-8), diesel, and gasoline. (**Hazardous Materials and Waste Section 3.12)** However, the DEIS fails to disclose critical details—such as tank capacities, total fuel volumes, specific locations, maintenance history, or compliance with federal and state environmental regulations—citing vague "security concerns."

While operational security is important, environmental safety and public health require transparency and accountability. The people of Kauaʻi have a right to know the scale of risk posed by these facilities, especially given the island's fragile aquifers, proximity to sensitive ecosystems, and reliance on limited freshwater resources.

The absence of this data creates unacceptable blind spots in the assessment of spill risk, cumulative contamination potential, and emergency response readiness. Red Hill on Oʻahu is a stark example of what happens when secrecy and neglect overshadow accountability: fuel leaks poisoned water supplies, displaced families, and caused a public health disaster that will take decades to fully address. Kauaʻi cannot afford a repeat of that tragedy.

PFAS Contamination Risk

- The DEIS also acknowledges historic use of Aqueous Film-Forming Foam (AFFF) for firefighting at PMRF(**Hazardous Materials and Waste Section 3.12 4-5)**, which contains per- and polyfluoroalkyl substances (PFAS)—often called "forever chemicals" due to their persistence in soil and groundwater. These substances are linked to cancer, reproductive harm, and immune system dysfunction, and they do not break down in the environment.
- While the DEIS states that PMRF is part of a broader Navy PFAS investigation program, no site-specific data, sampling results, or cleanup plans have been provided to the public. This is unacceptable, given:
- The known risks of PFAS to human and ecological health.
- The precedent of other military installations in Hawaiʻi where PFAS contamination has been confirmed.
- The Navy's kuleana to prevent further harm to the ʻāina and to the communities that depend on clean water.

Why This Matters for Kauaʻi

- Hydrological vulnerability: West Kauaʻi's shallow aquifers are highly susceptible to contamination, and there is limited redundancy for water supply.
- Proximity to shoreline ecosystems: A spill or PFAS plume could reach the ocean, harming coral reefs, fisheries, and cultural resources.

- Cumulative impacts: Combined with pesticide runoff, landfill leachate, and industrial contaminants, the risk of compounding toxicity is severe.

Recommendations:

- **Conduct a full accounting of all fuel storage systems associated,** including:
  - Number of tanks
  - Estimated capacity
  - Location (generalized if necessary for security)
  - Compliance with EPA and Hawai‘i Department of Health regulations
  - Results of the most recent inspections and any corrective actions taken
- **Extend this assessment to all fuel and chemical storage on fee simple parcels**, not just state-leased lands.
- **Commit to third-party verification** of compliance and **public reporting of summarized findings** to ensure transparency and community trust.
- **Provide a detailed spill prevention and emergency response plan**, including:
  - Contingency planning for catastrophic failures
  - Coordination with state and county emergency agencies
  - Public notification protocols
- **Complete a comprehensive PFAS site investigation** across all known and suspected AFFF use areas **before any lease renewals are considered**. This must include:
  - Soil and groundwater sampling
  - Disclosure of results to the public
  - Development of an immediate cleanup plan if contamination is confirmed
- **Transition all firefighting systems on Kaua‘i to PFAS-free alternatives immediately**, and provide documentation of compliance.
- **Establish a permanent monitoring program for PFAS and other hazardous chemicals** at PMRF, with data made available to the public on an annual basis.

The Cost of Inaction

Failing to address these risks is not just a regulatory gap—it is a direct threat to public health, cultural survival, and ecosystem integrity. Red Hill must serve as the cautionary example, not the template for future disaster. The Navy and NASA must choose proactive transparency over reactive crisis management.

2. Adjacent Contamination from Pesticide Use, Landfill Leachate, and Runoff into Coastal Waters

The Draft Environmental Impact Statement (DEIS) acknowledges the Mānā Plain Drainage Ditch System and notes that stormwater runoff from surrounding agricultural lands and infrastructure discharges into the ocean at outfalls such as Kawai‘ele and Nohili. **(Water Resources 3.7-4 through**

3.7-5)However, the DEIS fails to fully account for the historic and ongoing contamination risks tied to these discharge points, which are in close proximity to PMRF operations and lease areas.

Historic and Ongoing Contamination Risks

- The Kekaha Landfill, located near the PMRF lease boundary, has been an enduring source of community concern. This landfill, which receives municipal waste, industrial materials, and potentially hazardous debris, generates leachate—a toxic liquid formed when rainwater percolates through waste.
- Leachate can migrate through groundwater or drainage systems, ultimately discharging to nearshore waters. Local advocacy groups, the Surfrider Foundation, and the Hawai‘i Department of Health have all raised alarms about the pollutant load at these outfalls, including heavy metals, hydrocarbons, plastics, and PFAS-like compounds.
- Adjacent agricultural lands, historically plantation fields and now largely leased to industrial seed companies, have contributed pesticides, herbicides, and fertilizers to the drainage system. Many of these chemicals are restricted-use pesticides linked to reef degradation and bioaccumulation in marine life.

The cumulative effect of military operations, chemical-intensive agriculture, and waste management practices has created a toxic burden on the ecosystems of West Kaua‘i—one that disproportionately affects Native Hawaiian communities, subsistence gatherers, and endangered species.

PMRF’s Role and Kuleana

The DEIS asserts that PMRF does not have jurisdiction over the ditch system. However, **legal jurisdiction does not erase moral and environmental responsibility**. PMRF benefits from and operates adjacent to these systems; its infrastructure, hydrology, and roadways influence stormwater patterns. Furthermore, military land occupation historically altered these landscapes, contributing to their current configuration.

To say “we lack authority” is insufficient. Stewardship requires proactive engagement—not avoidance.

Impacts to Marine and Cultural Resources

Contaminated stormwater harms:

- Native marine species critical to ecological health;
- Cultural practitioners and local fishers who rely on clean waters for ‘ohana subsistence and ceremonial purposes;
- Endangered waterbirds and wetlands near the Mana Plain.

The cumulative impacts represent an environmental injustice—compounded by the lack of accountability and the ongoing militarization of Hawaiian land.

Recommendations:

- **Collaborate with the State (HDOH), County of Kauaʻi, and Agribusiness Development Corporation (ADC)** to:
    - Implement comprehensive **water quality monitoring** of the Mānā Plain ditch system and all outfalls.
    - Test for pesticides, heavy metals, PFAS, hydrocarbons, and landfill leachate.
- **Disclose any historic or current military contributions** to pollutants in the ditch system.
- **Develop and fund a joint remediation plan** to prevent contaminants from reaching the ocean.
- Establish a **community-led oversight committee** for transparency in testing and mitigation.
- **Condition any lease renewal** on a **binding financial commitment** from the federal government to assist with **Kekaha Landfill closure, long-term remediation, and leachate management**.
- Support for **wetland restoration and regenerative agriculture** as part of a larger environmental justice framework.
- **Require phase-out of chemical-intensive agriculture** on state-leased lands within the military footprint, and partner with the State and local communities to **transition these lands to native ecosystem restoration and food sovereignty projects.**

Why Financial Commitment and Restoration Are Non-Negotiable

The Navy and federal government have the capacity—and obligation—to correct decades of environmental harm and ensure future resilience. This means:

- Funding the closure and cleanup of the Kekaha Landfill, which currently poses one of the greatest contamination threats to West Kauaʻi's reef ecosystems.
- Providing capital investment for stormwater treatment and wetland expansion to filter contaminants naturally.
- Supporting community-based land uses such as cultural restoration, traditional agriculture, and habitat rehabilitation.

Stewardship is not a symbolic gesture—it is active, restorative, and rooted in accountability. This is the time for the federal government to demonstrate true kuleana: invest in cleaning up the contamination, restoring the wetlands, and ensuring that lands once impacted by militarization serve the health and well-being of Kauaʻi for generations to come.

3. Unexploded Ordnance (UXO) Risks and Safety

The Draft Environmental Impact Statement (DEIS) acknowledges that unexploded ordnance (UXO) and other munitions and explosives of concern (MEC) may be present on PMRF lands due to past live-fire exercises, ordnance testing, and training. **(Geological Resources Section 3.5.12-13)** In this section is states "prior to any ground-disturbing activities within areas known or suspected to contain munitions and explosives of concern, UXO avoidance or clearance operations would be conducted by qualified personnel in accordance with DoD policy and procedures."

While this language addresses future construction activities, it fails to address the existing, ongoing risk of legacy UXO to public safety, cultural practitioners, and natural resources. The DEIS provides no clear plan for proactive cleanup, no timeline for remediation, no publicly accessible risk mapping, and no transparent community safety protocols.

Why This Is a Serious Concern

- Public Safety Risks: UXO remains live and dangerous for decades. Unauthorized entry or accidental disturbance could result in severe injury or death to community members, including subsistence fishers or cultural practitioners.
- Environmental Impacts: UXO can leach heavy metals and explosive residues into soil and groundwater, creating long-term contamination hazards for ecosystems and endangered species.
- Cultural Access: PMRF occupies lands that hold cultural significance to Native Hawaiian lineal descendants and practitioners. Restricted access zones and contamination risk further compound cultural displacement.
- The current approach—essentially "leave in place and restrict access"—is not an acceptable long-term solution. It prioritizes convenience over safety, environmental stewardship, and community trust.
- Recent disasters like Red Hill demonstrate that lack of proactive risk mitigation leads to public health crises, massive financial liability, and irreparable harm to community trust. Waiting for an incident to occur is neither defensible nor compliant with the spirit of federal environmental and cultural protection laws.

Recommendations:

- **Conduct and publish a comprehensive UXO risk assessment** of all PMRF leasehold lands, adjacent beaches, and nearshore waters, including:
    - Detailed mapping of confirmed and suspected UXO areas
    - Risk categorization based on type, depth, and proximity to public areas
- **Commit to cleanup and remediation of legacy UXO before any lease renewals are approved**, prioritizing:
    - High-risk zones near cultural sites, public access corridors, and sensitive habitats
    - Areas needed for future community use or restoration
- **Develop a transparent, community-informed safety plan**, which includes:
    - Public education and notification about UXO hazards
    - Clearly marked boundaries and access guidelines
    - An incident response protocol that is coordinated with state and county agencies
- **Include UXO remediation in the Environmental Mitigation and Community Benefit Plan**, ensuring federal funding is allocated for:
    - Removal and safe disposal of munitions
    - Soil and groundwater testing at former impact zones
    - Restoration of cleared lands for cultural and ecological uses
- **Establish a permanent reporting system**, with annual public updates on:

- UXO removal progress
- Risk reassessment findings
- Community consultations and safety measures

Leaving UXO buried indefinitely is a continuation of harm and environmental injustice. True stewardship requires more than compliance—it demands accountability, transparency, and active remediation. The people of Kauaʻi deserve clear commitments and visible progress to make these lands safe for current and future generations.

4. Military Use of Kaʻula Island

Kaʻula Island, located off the west coast of Niʻihau, is not an empty rock or a mere training ground—it is a place of deep cultural and spiritual significance, embedded in Native Hawaiian moʻolelo (oral traditions) and ancestral connections to the kai (ocean) and ʻāina (land). The island is also an important seabird nesting habitat, supporting species such as ʻuaʻu kani (wedge-tailed shearwater) and noio (black noddy), which are integral to Hawaiʻi's fragile marine ecosystem.

Yet, despite its cultural and ecological importance, Kaʻula remains an active live bombing range for the U.S. military:

- Live ordnance continues to be deployed on and around the island as part of training exercises.
- Unexploded ordnance (UXO) remains on-site, posing ongoing hazards to both human life and the environment.
- Access to Kaʻula is restricted—not to protect the land, but to protect people from the danger created by the military itself.
- This is not stewardship. This is desecration.

Impacts of Continued Bombing

- Physical Destruction of Habitat
  - Live-fire exercises damage fragile cliffside nesting areas for seabirds and degrade the rocky terrain, which has cultural significance as a wahi pana (storied place).
- Persistent UXO Hazards
  - Unexploded bombs remain scattered across Kaʻula and its surrounding waters, creating long-term contamination risks from metals and explosive residues.
- Marine Impacts
  - Bombing introduces heavy metals and explosive compounds into nearshore waters, which can leach into coral reef systems and harm marine life.
- Cultural and Spiritual Harm
  - Kaʻula is part of a continuum of sacred spaces across the Hawaiian archipelago. Continued militarization perpetuates a cycle of cultural erasure and environmental violence.

Why This Matters

- The ongoing use of Kaʻula for live-fire training decades after similar sites elsewhere have been decommissioned reflects a double standard and a lack of commitment to cultural and ecological restoration in Hawaiʻi. Other bombing ranges on the continent have been closed and remediated, yet Kaʻula remains a sacrifice zone, its future held hostage to military convenience.
- This is a clear violation of:
- Environmental justice principles, as Native Hawaiian communities bear the burden of risk and loss.
- Cultural resource protection laws, which require meaningful consultation and mitigation.
- Public trust responsibilities, which demand the preservation of Hawaiʻi's unique natural and cultural heritage.

Recommendations:

- **Immediately cease all live-fire training and ordnance deployment on Kaʻula Island and surrounding waters.**
- **Develop and implement a comprehensive environmental restoration plan**, including:
  - Full UXO clearance and safe disposal
  - Soil and water testing for contaminants
  - Habitat rehabilitation for native seabirds and plant species
- **Engage Native Hawaiian cultural practitioners, lineal descendants, and community leaders** to:
  - Guide cultural stewardship practices
  - Integrate traditional ecological knowledge into restoration efforts
  - Conduct cultural impact assessments prior to any future use or decision-making
- **Explore co-management or full return of Kaʻula Island** to a **Native Hawaiian cultural and conservation trust**, ensuring:
  - Legal protections for cultural access
  - Long-term ecological monitoring
  - A governance framework grounded in aloha ʻāina (love for the land) and stewardship ethics
- **Provide public accountability** by:
  - Publishing a timeline for cessation of bombing
  - Allocating federal funding for remediation and restoration
  - Committing to long-term reporting on ecological and cultural recovery

The militarization of Kaʻula Island is an ongoing wound in Hawaiʻi's cultural and environmental landscape. Continuing to bomb a sacred island in 2025 is indefensible. True stewardship requires more than words—it requires action to heal what has been harmed, restore cultural access, and return Kaʻula to its rightful role as a place of life, not destruction.

5. Environmental Impacts of RIMPAC Exercises

The Rim of the Pacific Exercise (RIMPAC), the world's largest multinational naval exercise, is hosted biennially in Hawaiian waters, with PMRF providing key logistical support. Although the Draft Environmental Impact Statement (DEIS) acknowledges these activities, its analysis is limited to predictive modeling without in-depth examination of real-world impacts from repeated sonar use, vessel traffic, explosives, and ordnance disturbance.

Evidence of Marine Harm and Stranding Events

Naval sonar use has been consistently linked to marine mammal strandings worldwide. Relevant documented events include:

- A 1998 RIMPAC-related stranding near Kaua'i, involving one beaked whale and one sperm whale.
- In 2004, approximately 200 melon-headed whales were observed entering Hanalei Bay, believed to be fleeing naval sonar activity conducted during RIMPAC. One calf later died.
- A juvenile Cuvier's beaked whale was found washed ashore on Moloka'i after RIMPAC (causation being investigated).
- Globally, mass strandings of beaked whales have repeatedly coincided with naval sonar use—including in the Canary Islands, Bahamas, and Greece.

Studies estimate that high-intensity sonar and explosive use may result in hundreds of instances of hearing loss or marine mammal injury per year, including over 200 possible fatalities annually from training exercises across the Pacific.

Key Impacts Detailed in the DEIS

- Disruptions to marine mammal behavior, including stress responses, disorientation, and potential injury or death.
- Acoustic pollution, interfering with communication and navigation among whales and fish species.
- Elevated ship strike risk during high-traffic exercise periods, particularly affecting humpback whales (koholā).
- Underwater detonations and debris, contributing toxins and metal contaminants to nearshore ecosystems.
- Air and water emissions from large-scale naval and aircraft operations.
- While the DEIS labels these impacts as temporary, the biennial repetition of RIMPAC renders them cumulative and chronic.

Cultural and Ecological Consequences

Hawai'i's ocean is deeply cultural—essential to Native Hawaiian voyaging, mo'olelo, and subsistence. The continued intrusion of military activities into these waters:

- Disrupts traditional fishing, navigational, and ceremonial practices.
- Contradicts Hawai‘i’s stewardship responsibilities (mālama i ke kai).
- Militarizes sacred marine spaces instead of protecting them.

Why Current Mitigation Falls Short

Current protective measures—such as marine mammal observers, sonar shutdown protocols, and modeling-based mitigation—do not address:

- Long-distance acoustic effects that extend well beyond visual detection.
- Lack of independent verification and surveillance of compliance.
- Absence of community-accessible data and real-time monitoring.
- Failure to assess cumulative effects over decades and interactions with climate stressors.

Recommendations for Urgent Action

To respect ecological and cultural integrity, I urge:

1. **Cancellation of RIMPAC exercises** until a full independent environmental and cultural review is completed, with community input and scientific transparency.
2. Prioritization of **marine sanctuary protections**, especially in culturally significant and environmentally sensitive areas.
3. An immediate moratorium on sonar and explosive training near **populated marine habitats**.
4. Mandatory **real-time monitoring with independent oversight**:
    a. Acoustic sensors, marine mammal tracking,
    b. Public access to environmental data.
5. Investment in **community-led marine stewardship and restoration**, including traditional Hawaiian practices and scientific collaborations.

The multiple documented incidents of whale strandings and behavioral disruption linked to sonar and RIMPAC activity clearly demonstrate that these exercises are incompatible with Hawai‘i’s responsibility to protect its marine ecosystems. Continued operation without rigorous oversight and respect for cultural values perpetuates environmental injustice.

Hawai‘i must choose restorative protection over military convenience. RIMPAC must be suspended pending a transparent, community-centered review. Our ocean cannot wait.

6. Electromagnetic Radiation, High-Radiation Activities & Space Warfare

The DEIS does not sufficiently assess the public health, cultural, and environmental implications of electromagnetic radiation (EMR), high-radiation activities, or the expansion of space warfare technologies at PMRF and NASA’s Kaua‘i Test Facility.

Electromagnetic Radiation and Public Health

NASA's operations at the Kaua'i Test Facility and PMRF's advanced systems involve powerful radar, satellite communication, and tracking technologies. While these are essential for mission objectives, chronic EMR exposure may have health implications for workers and nearby communities. Current research points to potential effects on human health, wildlife navigation, and pollinator populations.

The DEIS only references EMR in passing without providing baseline data, cumulative exposure analysis, or compliance details regarding FCC and health safety thresholds for continuous emissions. This omission leaves major questions unanswered:

- What are the maximum EMR levels during peak operations?
- How far do radiation footprints extend into public or sensitive cultural areas?
- Are there monitoring programs in place, and will results be made public?

High-Radiation Activities and Space Warfare Risks

The DEIS mentions missile defense, hypersonic weapons testing, and space-related operations, but fails to discuss the cumulative risks of militarization in outer space. Space warfare activities, including satellite interception or debris-producing tests, can have far-reaching implications for Hawai'i's skies, atmosphere, and even cultural practices tied to celestial observation.

Further, accidental malfunctions or debris re-entry could introduce radioactive or toxic materials into our islands' ecosystems, a risk that must be analyzed under NEPA's mandate for comprehensive review.

Recommendations:

- Provide a full electromagnetic radiation risk assessment, including continuous monitoring, mapping of exposure zones, and public reporting;
- Analyze the cumulative impacts of radar, communications, and missile-defense emissions on human health, cultural practices, and ecological systems;
- Evaluate the potential consequences of space warfare testing, including debris, atmospheric pollution, and long-term sustainability risks;
- Include independent third-party oversight for radiation safety compliance and mitigation;
- Engage cultural practitioners to assess impacts on practices involving celestial navigation and star-based traditions.

7. Access Rights, Hunting, and Traditional Gathering Practices

One critical area insufficiently addressed in the Draft Environmental Impact Statement (DEIS) is the impact of PMRF operations and proposed lease renewals on public access and the exercise of traditional and customary practices, including fishing, gathering, and hunting.

Historically, the lands and nearshore waters now under military use were integral to Native Hawaiian subsistence and cultural practices. Families from Kekaha, Waimea, and Ni'ihau traditionally accessed

these areas for gathering limu, fishing, crabbing, and hunting in the uplands. These practices are not recreational conveniences; they are constitutionally protected rights under the Hawai‘i State Constitution (Article XII, Section 7) and affirmed in landmark cases such as *Ka Pa‘akai o Ka ‘Āina v. Land Use Commission*.

The DEIS does not demonstrate how PMRF will ensure that these rights are preserved, exercised safely, and supported in perpetuity. Instead, it references existing “restricted access” zones without providing clear pathways for community engagement or accommodation of cultural and subsistence needs.

Concerns:

- Ongoing military restrictions limit shoreline and nearshore ocean access during training exercises, creating significant barriers for traditional practitioners.
- The presence of unexploded ordnance (UXO) and other hazards on lands that were historically used for hunting and gathering presents a serious safety risk that remains unaddressed.
- Lack of a transparent and enforceable policy on access means that Native Hawaiian and local community rights are effectively undermined by federal land control.

Recommendations:

1. **Formalize Access Rights and Protocols**
    a. Develop and adopt a clear access policy, co-created with Native Hawaiian cultural practitioners, subsistence fishers, and local hunting groups, to ensure the exercise of traditional practices continues without undue restriction.
2. **Safety Provisions**
    a. Conduct comprehensive UXO clearance and contamination assessments before opening any area to public access.
    b. Implement a transparent communication system (including online updates and signage) for scheduled closures and hazards.
3. **Community Engagement and Co-Management**
    a. Establish an Access Advisory Council composed of cultural practitioners, community members, and agency representatives to guide decisions related to access, safety, and traditional use.
    b. Incorporate access commitments into lease agreements to prevent future erosion of these rights.
4. **Cultural Training for Military Personnel**
    a. Require PMRF and NASA staff to undergo training on Native Hawaiian cultural rights and customary practices, ensuring on-the-ground personnel respect and support lawful gathering and hunting activities.

Access to ‘āina and kai is not just a convenience—it is a lifeline for cultural continuity, food security, and spiritual connection. The military’s use of these lands must never come at the expense of constitutionally protected rights and community well-being. Lease renewals should be conditioned upon

enforceable guarantees that these rights will be honored, facilitated, and protected for generations to come.

C. Stewardship & Environmental Restoration

This section addresses critical areas where the Department of Defense, Navy, NASA, and the State must demonstrate genuine stewardship through concrete actions that heal environmental damage, support community resilience, and respect Native Hawaiian cultural values.

1. Biosecurity and Coconut Rhinoceros Beetle (CRB) Management

The Draft Environmental Impact Statement (DEIS) mentions biosecurity and the Coconut Rhinoceros Beetle (CRB) only briefly (**Best Management Practices Section 2.44-45**), lacking a dedicated program to monitor, prevent, and manage this invasive species. This omission is a serious gap given the devastating impact CRB can have on Hawai‘i’s culturally and ecologically vital palms—coconuts and native species alike.

The Navy’s long-term presence and land use at PMRF impose a kuleana to actively safeguard island ecosystems against new and spreading invasive threats. Without rigorous biosecurity and early detection programs, the community and environment remain vulnerable to irreversible harm.

Recommendations:

- Develop and implement a comprehensive biosecurity program with routine monitoring and transparent reporting.
- Establish formal, collaborative response protocols with the Hawai‘i Department of Agriculture and other local agencies to rapidly address CRB outbreaks and other invasive species.
- Promote community education and engagement to build widespread awareness and support for invasive species prevention and control efforts.

2. Wetland Protection and Restoration of the Mana Plain

The DEIS acknowledges the existence of wetlands adjacent to PMRF—such as the Kawai‘ele State Waterbird Sanctuary —and recognizes federally designated wetlands near the base boundary. However, it fails to commit to active restoration, expansion, or mitigation of wetland degradation.

Historically, the Mana Plain was one of the largest and most productive wetland ecosystems in the Pacific, stretching from Waimea to Kekaha. This vast wetland system supported rich biodiversity and served critical environmental functions. The loss and degradation of these wetlands following colonization and military land use represent profound ecological and cultural harm.

Recommendations:

- The Navy must partner with local conservation groups, Native Hawaiian cultural practitioners, and government agencies to actively restore wetlands, enhance native habitat, and support community-based stewardship programs.
- Funding and resources should be committed at a large scale to restore ecosystem functions, environmental services, and culturally significant landscapes.
- Restoration efforts should be designed to reintegrate indigenous knowledge and practices, returning the Mana Plain toward its natural and cultural legacy.

3. Housing Crisis and Social Displacement from Military Presence

The DEIS omits any meaningful evaluation of the military's role in exacerbating Kaua'i's acute housing affordability crisis and social displacement. Military personnel and civilian contractors receive generous housing allowances that inflate local rental markets, placing upward pressure on rents in already stressed communities such as Kekaha, Waimea, and Hanapēpē.

Additionally, large areas of land remain off-limits due to contamination or military restriction, further limiting available housing and development options. This dynamic disproportionately impacts Native Hawaiian families who already face historic marginalization, excessive land dispossession, and the enduring effects of failed state housing programs.

Recommendations:

- Conduct comprehensive studies and public disclosure of the military's contribution to local housing shortages and affordability issues, in compliance with NEPA's cumulative impact requirements.
- Implement mitigation strategies that include land return or transfer for community housing, investment in affordable and transitional housing projects, and partnerships with county and state housing agencies.
- Make such housing mitigation conditions mandatory prerequisites for any lease renewal or continued military land use.

4. Public Land Access, Cleanup, and Redevelopment

Significant portions of PMRF lands remain inaccessible to the public due to contamination from unexploded ordnance (UXO), PFAS, and other legacy pollutants. The Draft EIS does not adequately ensure cleanup or outline community-centered restoration goals.

Lease renewals must be explicitly conditioned on comprehensive environmental remediation efforts, especially for UXO and PFAS, paired with enforceable, binding plans for land restoration and community use. This should include priorities such as affordable housing, substance abuse treatment facilities, regenerative agriculture, and open access for local residents.

Successful models from other military-to-community transitions—such as Fort Devens, Massachusetts, and Brunswick Landing, Maine—illustrate the benefits of collaborative local redevelopment partnerships that center community priorities and healing.

Recommendations:

- Require environmental cleanup and restoration as conditions of lease renewal.
- Mandate the development of a local redevelopment partnership including government, community groups, and the military to guide land use planning.
- Prioritize community benefit and healing in redevelopment decisions, honoring the kuleana to restore and serve future generations.

5. Federal Investment in Community Healing Programs

Beyond its defense mission, the military has a broader responsibility to support Kaua‘i’s social well-being. There is a promising opportunity to create and fund community-based drug rehabilitation and transitional housing programs on non-operational military lands.

Examples exist where repurposed military land has become a site for critical social services, fostering healing while rebuilding trust between military institutions and local communities. The Department of Defense possesses mechanisms, such as the Defense Community Infrastructure Program and Intergovernmental Support Agreements, to facilitate these partnerships and investments.

Recommendations:

- Require military agencies to partner with local nonprofits, health providers, and government bodies to develop and sustain drug rehabilitation and transitional housing initiatives on or adjacent to PMRF lands.
- Establish these partnerships and investments as enforceable conditions for lease renewal or continued land use.

6. True Stewardship and Restorative Justice

The Navy and NASA must move beyond mere regulatory compliance to embody genuine stewardship, guided by the principles of justice, kuleana, and aloha ‘āina.

This means:

- Phasing out the use of harmful chemicals like PFAS and other “forever chemicals.”
- Leading large-scale efforts to restore wetlands and ecosystems in close partnership with the local community and Native Hawaiian stewards.
- Providing sufficient funding and technical support to the County of Kaua‘i for landfill cleanup and broader environmental restoration.

- Addressing social inequities linked to military presence, including housing displacement and economic marginalization.
- Respecting and uplifting Native Hawaiian cultural values, rights, and practices throughout environmental and land use decisions.

D. Closing Statement

The people of Kaua‘i deserve nothing less than transparency, accountability, and a sincere commitment to healing both our ‘āina and our communities. The Final Environmental Impact Statement and any lease renewal decisions must embody these core values and support a future where environmental restoration, cultural integrity, and community well-being are paramount.

PMRF-1184 (Record 20 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Daniel	**Last Name** Cole	**Mailing List** Yes	
Street 9 north Virginia ave	**City** Brunswick	**State** MD	**Zip** (none)
Email coledg9816@gmail.com		**Organization**	
Attachments (none)			
Comments Please don’t use any part of Kauai for missile practice. The environment is too fragile for that activity.			

PMRF-1185 (Record 19 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Gisele N.	**Last Name** Bisch	**Mailing List** Yes	
Street Au Street	**City** Waialua	**State** HI	**Zip** (none)
Email giselebisch.hawaii@gmail.com		**Organization**	
Attachments (none)			
Comments The Draft Environmental Impact Statement fails to address the ongoing damage being done to the land, water, and ocean ecosystems of West Kauai. There is no meaningful analysis of climate change, and no acknowledgement of the desecration, militarization, and environmental racism these projects to continue to impose on our Peoples. As a Native Hawaiian, I demand no new leases on these stolen Hawaiian lands. I demand full cleanup and restoration, and the return of the land to Native Hawaiians.			

PMRF-1186 (Record 18 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Anne	**Last Name** Shiparski	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			

Comments

Aloha e, My name is Anne Shiparski, and I am writing to express strong opposition to the proposed lease renewals at the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory. As someone who lives in Hawaiʻi and is deeply committed to environmental and cultural justice, I am disturbed by the inadequacy of the Draft Environmental Impact Statement. It fails to account for the ongoing desecration of sacred lands, harm to native ecosystems and endangered species, and the long-term health consequences of militarization for local communities. This is not a neutral issue. The U.S. military's continued use of Hawaiian lands perpetuates a legacy of occupation, environmental racism, and systemic violence against Kānaka Maoli. There is no justification for continuing these leases for another 30 years. What is needed is full remediation of the land, not further damage. I urge you to reject the lease renewals, conduct a full cleanup, and return ʻāina to Kānaka Maoli. Mahalo for your time and consideration, Anne Shiparski Oʻahu

PMRF-1187 (Record 17 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Leonani	**Last Name** Puaa	**Mailing List** Yes	
Street 237 Hololani Street	**City** Makawao	**State** HI	**Zip** (none)
Email leonvnii@gmail.com		**Organization**	
Attachments (none)			

Comments

To Whom It May Concern, I submit this testimony in strong opposition to the U.S. Navy and NASA's proposal to renew and extend leases on over 8,000 acres of Hawaiian lands on the island of Kaua'i for an additional 30 years. These lands—stolen from the Native Hawaiian people through illegal occupation and coercive land policies—have long suffered under the weight of militarization, desecration, and environmental degradation. The continued use and control of these lands by the U.S. military and federal agencies is a direct perpetuation of historical injustice and colonial violence. No new leases should be granted. Period. For decades, these lands—rich in cultural significance, ecological diversity, and ancestral value—have been subjected to bombing, weapons testing, surveillance infrastructure, and militarized operations. Native Hawaiians have been forcibly separated from the 'āina (land), and the natural environment has endured irreversible harm. The idea of extending this arrangement for another generation is unconscionable. I demand the following: 1. NO NEW LEASES. The U.S. Navy and NASA have no moral, cultural, or legal right to these lands. The existing leases should be allowed to expire, and no extensions or renewals should be granted. 2. FULL ACCOUNTABILITY. A thorough and transparent investigation must be conducted to assess the extent of cultural, ecological, and environmental harm caused by military and aerospace activity on these lands. 3. COMPREHENSIVE CLEANUP AND RESTORATION. The U.S. government must be held responsible for the environmental damage done and must allocate the resources necessary for the full restoration of these lands—removing unexploded ordnance, remediating soil and water contamination, and restoring native ecosystems. 4. RETURN OF LAND TO NATIVE HAWAIIANS. These lands must be returned to the stewardship of Kānaka Maoli (Native Hawaiians)—those whose genealogical, spiritual, and cultural ties to the 'āina predate U.S. occupation. The land must be restored to its rightful caretakers to ensure its protection and regeneration for generations to come. As caretakers of this sacred place, the Native Hawaiian people have never relinquished their inherent sovereignty or the right to determine the future of their lands. The further entrenchment of militarization not only violates these rights but directly contradicts the Navy's stated commitments to environmental

stewardship and cultural respect. Enough is enough. The era of military expansion at the expense of Native peoples, lands, and ecosystems must come to an end. The EIS process must not be a formality to rubber-stamp yet another 30 years of destruction—it must be a turning point. Let it reflect justice, healing, and the long-overdue return of lands to their rightful stewards. With deep respect for the ʻāina and its people, Leonani Kahookano Puaa Kaunakakai, Hawaii August 07th, 2025

PMRF-1188 (Record 16 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Lauren	**Last Name** Mangini	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization** None	
Attachments (none)			
Comments I am writing to demand that there be no new leases. The draft EIS does not account for the entire spectrum of harm (i.e. impact) on the land and waters. Aside from harm to the environment (land, water/ocean ecosystems and endangered species), there is the threat to sacred sites. The sacred sites are on land that belong to the Kanaka Maoli, and continued occupation without return, restoration or reparations is unconscionable. The draft EIS also lacks analysis on climate change impacts or long-term community health. This is not solely about environment and the land (though there are plenty of concerns not addressed in the draft EIS) - the critical issue is sovereignty of the Kanaka Maoli people and ending the racist occupation and desecration of their lands. I support not renewing the leases.			

PMRF-1189 (Record 15 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name alexx	**Last Name** sanchez	**Mailing List** No	
Street 89	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments FREE HAWAII! WE DEMAND LAND BACK			

PMRF-1190 (Record 14 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Cesarkeerm	**Last Name** CesarkeermBT	**Mailing List** No	
Street region@prrrvt.fun	**City** (none)	**State** CO	**Zip** (none)
Email region@prrrvt.fun		**Organization**	
Attachments (none)			
Comments https://auctionwheels.info/lots/40345386			

PMRF-1191 (Record 13 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Lori	**Last Name** Kizer	**Mailing List** No	
Street (none)	**City** Kapaa	**State** HI	**Zip** (none)
Email lori_kizer@yahoo.com		**Organization**	
Attachments (none)			
Comments I oppose the renewal. After the Navy recently poisoned 1000's on Oahu, lied, and tried to cover up how can anyone trust them? The war games, the bombings, the weapons testing and the damage being done to the marine ecosystem is all disgustingly insane in my opinion.			

PMRF-1192 (Record 12 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Alana	**Last Name** Kamaile	**Mailing List** Yes	
Street 92-433 Kaiaulu St	**City** Kapolei	**State** HI	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments GIVE US BACK OUR ʻĀINA YOU GREEDY HAOLE!			

PMRF-1193 (Record 11 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Paul	**Last Name** Dozier	**Mailing List** Yes	
Street 2562 Stillman St. Spc 1	**City** Selma	**State** CA	**Zip** (none)
Email bluesummitllc30@gmail.com		**Organization**	
Attachments (none)			
Comments In light of the desecration and ruin of this Native site on Kauai Island, I wish to deny the US Navy the right to continue its occupation there. I'm aware of the great expense requirements for this withdrawal. Please remember the recent allocation of extra federal funding to the Pentagon; use a little of that for this project.			

PMRF-1194 (Record 10 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Shyanne	**Last Name** Olores	**Mailing List** Yes	
Street PO BOX 185	**City** Lawai	**State** HI	**Zip** (none)
Email officialshykane@gmail.com		**Organization**	

Attachments
Yes

- File Attachment: shyanne_olores_objection_pmfr_declaration.docx

Comments
Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth I, Shyanne Olores, a Kanaka Maoli and descendant of Mana, Nohili, and the Hawaiian Kingdom, submit this testimony as a formal Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth. I object to the lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi. This testimony is submitted on the record in defense of the land, people, and rightful sovereign status of Hawaiʻi. As a descendant of Mana, my lineage, rights, and responsibilities to this ʻāina are protected by both natural law and international law. My grandparents were the last of our ʻohana to reside in Mana town. I was raised in Nohili, fishing and gathering, visiting the dunes where my ancestors — our iwi kupuna — are buried. My father and his brothers hunted in the Mana tunnels to feed our family. These lands are not abstract to me — they are my genealogy, my truth, my kuleana. This land — and all lands under PMRF — remain the territory of the Hawaiian Kingdom. I give Notice of Fact: The illegal overthrow of the Hawaiian Kingdom in 1893 was acknowledged by the U.S. government in the 1993 Apology Resolution. No treaty of annexation was ever ratified. Therefore, the United States has no legal claim to the lands it currently occupies at PMRF. I declare that the presence of the U.S. military on Hawaiian Kingdom lands constitutes ongoing illegal occupation. There is no lawful lease to renew. You cannot lease what was stolen. This land was never ceded. Kanaka Maoli have never relinquished our claims. The United States has no jurisdiction here. Over the past seven years, seven members of my ʻohana from Mana and Kekaha have died from cancer. Each of them worked in agriculture on the west side of Kauaʻi. These are not isolated incidents. They are the result of environmental violence committed by the U.S. military. PFAS — forever chemicals — were identified in PMRF soil and groundwater as far back as the 1960s. And yet, no cleanup has occurred. The Navy's promise of 'remediation forthcoming' is not a solution — it is a continuation of harm. I object to the poisoning of our land and people under the guise of national security. I further give Notice of Fact that the Draft

Environmental Impact Statement fails to account for cumulative impacts — including those of RIMPAC, live-fire drills, missile tests, and global weapons transfers that are directly linked to U.S. military activity at PMRF. The DEIS ignores environmental, cultural, and international legal consequences. This is not oversight — it is systemic erasure. As a Kanaka Maoli with ancestral ties to this land, I reject all options within this DEIS. I do not consent to continued occupation, expansion, or mitigation. I invoke my inherent rights to land, culture, and life. Therefore, I declare the following lawful demands:1. The immediate termination of all military leases and operations on Hawaiian Kingdom land at PMRF.2. Full cleanup of PFAS, fuel, and hazardous waste contamination.3. Restoration of sacred sites, including the dunes at Nohili.4. Full return of all lands under PMRF to the rightful stewards — the Kanaka Maoli. The U.S. military's continued presence on these lands, without consent, constitutes an act of aggression. It violates the principles of international law, natural law, and the rights of Indigenous peoples as outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). This is not America. This is the Hawaiian Kingdom. These are our lands. I stand in lawful objection, and I do so with the authority of my kūpuna behind me. I will not be silent while our people die and our lands are desecrated. He Hawai‘i au. I do not stand alone. Submitted in truth, honor, and defense of the ‘āina,Shyanne Olores

Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth

I, Shyanne Olores, a Kanaka Maoli and descendant of Mana, Nohili, and the Hawaiian Kingdom, submit this testimony as a formal Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth. I object to the lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi. This testimony is submitted on the record in defense of the land, people, and rightful sovereign status of Hawaiʻi.

As a descendant of Mana, my lineage, rights, and responsibilities to this ʻāina are protected by both natural law and international law. My grandparents were the last of our ʻohana to reside in Mana town. I was raised in Nohili, fishing and gathering, visiting the dunes where my ancestors — our iwi kupuna — are buried. My father and his brothers hunted in the Mana tunnels to feed our family. These lands are not abstract to me — they are my genealogy, my truth, my kuleana.

This land — and all lands under PMRF — remain the territory of the Hawaiian Kingdom. I give Notice of Fact: The illegal overthrow of the Hawaiian Kingdom in 1893 was acknowledged by the U.S. government in the 1993 Apology Resolution. No treaty of annexation was ever ratified. Therefore, the United States has no legal claim to the lands it currently occupies at PMRF.

I declare that the presence of the U.S. military on Hawaiian Kingdom lands constitutes ongoing illegal occupation. There is no lawful lease to renew. You cannot lease what was stolen. This land was never ceded. Kanaka Maoli have never relinquished our claims. The United States has no jurisdiction here.

Over the past seven years, seven members of my ʻohana from Mana and Kekaha have died from cancer. Each of them worked in agriculture on the west side of Kauaʻi. These are not isolated incidents. They are the result of environmental violence committed by the U.S. military. PFAS — forever chemicals — were identified in PMRF soil and groundwater as far back as the 1960s. And yet, no cleanup has occurred. The Navy's promise of 'remediation forthcoming' is not a solution — it is a continuation of harm. I object to the poisoning of our land and people under the guise of national security.

I further give Notice of Fact that the Draft Environmental Impact Statement fails to account for cumulative impacts — including those of RIMPAC, live-fire drills, missile tests, and global weapons transfers that are directly linked to U.S. military activity at PMRF. The DEIS ignores environmental, cultural, and international legal consequences. This is not oversight — it is systemic erasure.

As a Kanaka Maoli with ancestral ties to this land, I reject all options within this DEIS. I do not consent to continued occupation, expansion, or mitigation. I invoke my inherent rights to land, culture, and life.

Therefore, I declare the following lawful demands:
1. The immediate termination of all military leases and operations on Hawaiian Kingdom land at PMRF.
2. Full cleanup of PFAS, fuel, and hazardous waste contamination.
3. Restoration of sacred sites, including the dunes at Nohili.
4. Full return of all lands under PMRF to the rightful stewards — the Kanaka Maoli.

The U.S. military's continued presence on these lands, without consent, constitutes an act of aggression. It violates the principles of international law, natural law, and the rights of Indigenous peoples as outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

This is not America. This is the Hawaiian Kingdom. These are our lands. I stand in lawful objection, and I do so with the authority of my kūpuna behind me. I will not be silent while our people die and our lands are desecrated.

He Hawaiʻi au. I do not stand alone.

Submitted in truth, honor, and defense of the ʻāina,

Shyanne Olores

DEIS Comment Letter 0096

Cheryl Hendrickson <chermcmaui@aol.com> 8/6/2025 11:08 PM

End Military Leases

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Aloha Ms. Kerry Ling-

Please refuse to renew US Navy and NASA leases on Kaua'i.

Their draft EIS fails to access the full scope of harm by ignoring impacts to land, water, ocean ecosystems, endangered species, sacred sites and the health of surrounding communities.

There is no analyses of climate change impacts or acknowledgement of the desecration already taken place.

We demand a full clean up and restoration.

Many Mahalos,
Cheryl Hendrickson
40 year Kama'aina

DEIS Comment Letter 0097

Felicidy Phimmasone <felicidy@hawaii.edu> 8/7/2025 12:36 AM

Public Comment - PMRF 2025 DEIS - [Felicidy Phimmasone]

To info@pmrf-kpgo-eis.com

Written Comment on the 2025 Draft Environmental Impact Statement
Pacific Missile Range Facility (PMRF), Mānā, Kauaʻi
Submitted by: Felicidy Fidez Phimmasone
Affiliation: Community member of Ko Hawaiʻi Pae ʻĀina, Research Assistant at Māpuna Lab, and Master in Public Health Student at UH Mānoa
Date: August 6, 2025

To Whom It May Concern,

I submit this testimony in direct response to the 2025 Draft Environmental Impact Statement (DEIS) prepared by the U.S. Navy and NASA regarding activities at the Pacific Missile Range Facility (PMRF) in Mānā, Kauaʻi. I find it incomplete, inadequate, and deeply flawed in both legal standing and cultural impact analysis. The proposed actions must be halted, and the DEIS withdrawn or significantly revised.

First, the legal status of the lands are seized, not ceded. The DEIS repeatedly refers to the subject lands as “ceded.” This classification is factually and legally false. These lands were seized without consent or lawful treaty of annexation and remain under illegal military control. The Hawaiian Kingdom was recognized as a sovereign nation by the U.S. and many other countries, and no lawful transfer of its national lands has ever occurred.
Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S. Constitution’s recognition of treaties as the supreme law of the land (Article VI).

Second, The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with verifiable, public-facing documentation:

- Perchlorate contamination from solid rocket fuel used in missile launches and related propulsion testing.
- PFAS contamination, especially in light of the known airplane fire incident at PMRF in 2020 (source: *Honolulu Civil Beat, “Toxic Foam from Military Fire*

DEIS Comment Letter 0097

Training Raises Concerns on Kaua'i," 2021).

- The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials.

Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?

Third, the cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including:

- Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades.
- Leina a ka 'uhane (leaping places of the soul), which are located in proximity to PMRF training zones.
- Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access.
- Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity.

Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "pa'akai analysis" (as required under Hawai'i's environmental review framework) cannot be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.

Fourth, this DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include:

- No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors.
- No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region.
- No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities—especially children—living near military activity zones.
- No generational impact assessment on future health, land use, or cultural restoration.

DEIS Comment Letter 0097

This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory.

Finally and most importantly, this land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestor. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us. Instead, it harms us, visibly and invisibly.

The Navy and NASA must:

1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures.
2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments.
3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners.
4. Acknowledge the land as Hawaiian national land seized without consent, and stop referring to it as “ceded.”
5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established.

Mahalo for your time. Please understand that this testimony is not only for today, but for the next seven generations.

Onipa‘a Kākou,

Felicidy Fidez Phimmasone
felicidy@hawaii.edu

U H Manoa seal

Felicidy Phimmasone, BAPH
MPH candidate in Native Hawaiian & Indigenous Health
Thompson School of Social Work & Public Health
Department of Public Health Sciences
Māpuna Lab Research Assistant
UH ID 2336 - 9363
(808) 397-4435 | felicidy@hawaii.edu | LinkedIn

- Testimony Kaua‘i PMRF EIS.pdf (122 KB)

Written Comment on the 2025 Draft Environmental Impact Statement
Pacific Missile Range Facility (PMRF), Mānā, Kauaʻi
Submitted by: Felicidy Fidez Phimmasone
Affiliation: Community member of Ko Hawaiʻi Pae ʻĀina, Research Assistant at Māpuna Lab, and Master in Public Health Student at UH Mānoa
Date: August 6, 2025

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Any environmental or cultural assessment that ignores the status of these lands as illegally occupied Hawaiian national lands is inherently flawed and lacks jurisdictional legitimacy. The failure to acknowledge this legal truth undermines the entire EIS process and violates the U.S. Constitution's recognition of treaties as the supreme law of the land (Article VI).

Second, The DEIS fails to provide clear, cited documentation of pollution events caused by PMRF activities. I demand the following be fully disclosed and sourced with verifiable, public-facing documentation:

- Perchlorate contamination from solid rocket fuel used in missile launches and related propulsion testing.
- PFAS contamination, especially in light of the known airplane fire incident at PMRF in 2020 (source: *Honolulu Civil Beat, "Toxic Foam from Military Fire Training Raises Concerns on Kauaʻi," 2021*).
- The long-term effects of aerial and underwater testing, including sonar, radar, and debris from missile interception trials.

Where is the data? Where are the citations? Where is the health risk analysis for surrounding Native Hawaiian communities, especially those reliant on shoreline fishing, gathering, and farming?

Third, the cultural impact assessment in the DEIS is superficial and unacceptable. The analysis fails to identify or address key cultural resources and practices, including:

- Known iwi kūpuna (ancestral burials) in the Mānā dunes, which have been disturbed and disrespected repeatedly over decades.
- Leina a ka ʻuhane (leaping places of the soul), which are located in proximity to PMRF training zones.
- Traditional fishing, surfing, kilo (observation practices), and gathering areas currently threatened by noise, contamination, and restricted access.
- Spiritual and ceremonial uses of these coastal and ocean spaces that are central to Kanaka Maoli identity.

Without this level of specificity, the cultural impact analysis is functionally empty. And without a rigorous cultural impact analysis, a proper "paʻakai analysis" (as required under Hawaiʻi's environmental review framework) cannot be completed. Therefore, the Board of Land and Natural Resources (BLNR) must reject this DEIS on procedural grounds alone.

Fourth, this DEIS fails to meet the basic thresholds required by law and environmental best practices. Specific concerns include:

- No cumulative impact analysis of decades of contamination and development by PMRF and associated contractors.
- No meaningful consultation with Native Hawaiian traditional practitioners or cultural descendants of the Mānā region.
- No mental, emotional, psychological, or spiritual impact analysis for Native Hawaiians or local communities—especially children—living near military activity zones.
- No generational impact assessment on future health, land use, or cultural restoration.

This violates the principles of environmental justice, as outlined under NEPA, HRS Chapter 343, and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), to which the U.S. is a signatory.

Finally and most importantly, this land is not a testing ground. It is a sacred place that carries the bones, stories, and practices of our ancestor. The continued use of PMRF for missile testing, war simulations, and surveillance does not protect us. Instead, it harms us, visibly and invisibly.

The Navy and NASA must:

1. Withdraw this DEIS and issue a corrected version with full legal, cultural, and environmental disclosures.
2. Fully disclose pollution events (e.g., PFAS, perchlorate), with citations and risk assessments.
3. Re-conduct the cultural impact assessment in meaningful partnership with qualified Native Hawaiian cultural practitioners.
4. Acknowledge the land as Hawaiian national land seized without consent, and stop referring to it as “ceded.”
5. Immediately cease any expansion, testing, or development on contested or culturally significant lands until lawful, consent-based processes are established.

Mahalo for your time. Please understand that this testimony is not only for today, but for the next seven generations.

Onipaʻa Kākou,
Felicidy Fidez Phimmasone
felicidy@hawaii.edu

DEIS Comment Letter 0098

Kimmer Horsen <khorsen@my.hpu.edu> 8/7/2025 12:56 AM

Barking Sands, Kokee Observatory EIS

To info@pmrf-kpgo-eis.com

Aloha Navy EIS Officer,

Aole! Aole! Aole!

My name is Kimmer Bighorse and have been stationed at Schofield Barracks as a light and heavy wheel diesel vehicle mechanic/Soldier at first in 2008. I enlisted for the Global war on terrorism in March 2002 where I served in many middle east and overseas tours including Germany, Hawaii, Iraq, Qatar, Texas, California and Afghanistan. Since then, I never in my active duty Army career, witnessed the destruction and neglect of the environment as abuse in Hawaii's oceans, skies, space, and land bases by the United States military.

Native Hawaiians or Kanaka Maoli of the Hawaiian Kingdom have been monitoring their wahi pana land bases such as Barking Missil Range, Kauai, Kokee Observatory, Pohakuloa since 1957. This is why I recommend getting rid of the missile ranges, SONAR test submarine test sites, field artillery ranges, armor combat units from Hawaii entirely as there is simply not enough room for their equipment, personnel or families. Not only that, the hazardous materials, contamination and pollution from such destruction of field training, ordnance detonation contamination is not disposed of properly.

This would never occur in Germany, Iraq, Afghanistan or Kuwait who each have a heavily armed arsenal, military, even terrorist organizations inflicting violence on U.S. military personnel. Germany monitors the United States base environmental impact. Even so, the German Bundeshwehr did not renew their United States military leases, evicted much of the the United States military and downsized US forces.

I recommend downsizing the active duty personnel here on all islands to the bare minimum as the United States is belligerently occupying and destroying Hawaii Pae Aina, its people and environment since 1893. The following are specific examples of the war crimes being committed by the United States military.

On December 6, 2019, a Pearl Harbor Sailor Machinist Mate Auxilliary Fireman Gabriel Antonio Romero shot two department of defense personnel, injured Roger Nakamine and then shot himself.

On July 12, 2024, PFC Dewayne Johnson murdered and dismembered his wife's body in a trash dumpster on Schofield Barracks Hawaii.

On January 2021 SPC Raul Hernandez Perez struck his wife in the back of the head with a baseball bat, stabbed her in the back then dismembered her body into a trash dumpster on Schofield Barracks Hawaii.

Since 2019 Operation Keiki Shield 18 has the Hawaii ICAC Task force has arrested more than 108 individuals perpetrators and child predators, Marines, Soldiers, Sailors, Coast Guard and Air Force alike. 3 arrests were made during Operation Keiki Shield Kauai.

Under international law, the United States must enforce the laws of the Occupied State, the Hawaiian Kingdom. As such, Barking Sands needs to be de-occupied, decontaminated of UXOs, depleted uranium and any other ordnance in the land, water and oceans by the United States Navy.

The belligerent military occupation and pillaging of such Hawaiian Kingdom lands, oceans, waterways is a an active crime against humanity.

On August 8-16, 2023, Lahaina wildfires killled 108 Lahaina citizens and 2 went missing. The damage has been estimated to be 6 billion while FEMA estimated more than 2200 buildings burned. The United States Navy could have deployed their submarines, cruise ships, destroyers, vessels and planes to assist in putting out the fires and saving countless lives and properties. The United States Navy at both Pearl Harbor and Barking Sands Missile range were apathetic and indifferent while an entire city of men, women, children and pets were torched. Hawaii cannot have such neglect, abuse and blatant apathy present on its sacred lands.

DEIS Comment Letter 0098

President Bill Clinton confessed, recognized and apologized for the belligerent overthrow of the Hawaiian Kingdom in 1893 but to this day, did nothing to offer remittance or restitution for the war crimes still being committed today.

Navy personnel and military personnel contribute to the sex trafficking industry in Hawaii more than any other occupation. Native Hawaiian wahine suffer an exploitation epidemic at the hand of belligerent occupation.

Kanaka Maoli, Native Hawaiian Opio suffer the most suicide ideation, attempt and lethal suicide more than any other racial and age demographic in Hawaii.

Belligerent military occupation adversely effects the mental, spiritual, physical, and emotional health of all Kanaka Maoli Kingdom subjects: depression, anxiety, loss, homelessness, child abuse, poverty, mental disorders, and mood disorders.

Addiction and houselessness are a result of belligerent occupation, the destruction of the environment, the ocean, the wahi pana, sky pollution, destruction of sacred sites, heiau, burial grounds that adversely effect Hawaiian subjects mental health, the Hawaiian Nationals who experience violent United States Navy military occupation daily.

Native Hawaiians are denied access to their sacred sites, oceans, on bases and military reservations, banned from ensuring the United States Navy disposes and decontaminates its live fire and submarine SONAR exercise training debris.

Dead whales wash up on shore because of the violent SONAR sounds the submarines make causing the whales, honu and endangered Hawaiian monk seals deaf.

I reiterate the United States Navy complies with the endless contamination of our Halawa Shaft on Oahu that hydrates much of Moanalua military personnel, Pearl Harbor and Hickam bases. PFAS has been detected as well as toxic lead at the Army firing range Puuloa in Ewa Beach.

Does the Army really need endless inventories of Abrams, Bradley tanks, heavy armor equipment vehicles, Strykers, 5-ton trucks, Howitzers, Patriot missile launchers for land battles like WWII?

Even though there are other militaries with nuclear powers building up, strategic war planning, and storing their arsenal the world over, the keiki o ka aina would rather restore their lands, oceans, air and space than further contaminate and pollute their sacred water resources and wahi pana. There are other locations for the United States to stock their heavy armor equipment and munitions other than the already overcrowded, overpopulated Oahu, Big Island, Kauai, Maui, Kahoolawe, Lanai and outlying islands such as Polaniku; desserted locations such as the Mojave Desert in California.

I recommend sending EOD expolsive disposal units into clean up the deadly depleted uranium buildup, unexploded ordnance and deoccupy Barking Sands missile range immediately. Allow Hawaiian cultural practitioners, kupuna, Kumu supervise the decontamination.

Do NOT accept the Navy's version of an environmental impact statement.

E malama pono, Aloha aina, Aloha Wai, Aloha Wakea, Aloha Kanaloa

Kimmer (Nahonu) Bighorse Horsen

10 year United States Army Veteran

Turtle Clan

P.S.

I am submitting this testimony on behalf of myself, as well as in solidarity with Native Hawaiians, environmentalists, water protectors, and all who care deeply about the health of our oceans, the protection of marine life, and the preservation of cultural and sacred practices tied to the moana (ocean). I am deeply concerned about the inadequacies and misleading statements in the Draft Environmental Impact Statement (EIS) and Overseas Environmental Impact Statement (OEIS) for the Hawaii-California Training and Testing (HCTT) activities.

Here is an outline of some of the issues in the documents, hereafter called the EIS or OEIS. It is not comprehensive, because despite regulations that the maximum size of an EIS is 300 pages, this document is 4 volumes long with the first volume alone being over 700 pages. It is a blatant violation of the regulation and makes the document unreadable to community members, but here are some highlights.

DEIS Comment Letter 0098

The No Action Alternative is Misrepresented

Under § 1502.14, the alternatives section is the heart of the EIS. The No Action Alternative, where the Navy stops military testing and training activities in our waters, is described in the document as resulting in conditions "unchanged or slightly improved from baseline conditions." This is a gross misrepresentation. The No Action Alternative should be evaluated based on the BENEFITS of stopping harmful military activities, not just the absence of harm. Currently the NAVY is running 7,432 activities per year under this EIS in Hawaii alone, according to tables G-16 and G-17.

For example:

Endangered Species Recovery: If endangered birds, Hawaiian monk seals, humpback whales, and green sea turtles are not subjected to thousands of harmful interactions with the Navy each year, they have a far greater chance of recovery. The Hawaiian monk seal, with only 1,600 individuals remaining, is highly sensitive to disturbances. In a 7 year period, they would avoid 9,228 instances of harm from the NAVY. Humpback whales, which migrate through Hawaiian waters annually, and green sea turtles, which depend on nearshore habitats, are also at risk with thousands of harmful interactions (see below). Stopping military activities would allow these species to thrive.

Cultural and Community Benefits: For Kanaka Maoli (Native Hawaiians), the ocean creatures are not just a resource but a relative, as described in the Kumulipo. Constant harm to marine life and intrusions on cultural practices, such as fishing and traditional ceremonies, have profound spiritual and community impacts. Ending military activities would restore the ability of Native Hawaiians to malama ocean relatives and practice cultural traditions.

Reef and Ocean Health: Coral reefs, already under immense stress from climate change, would have a chance to recover if not constantly harmed by Navy activities. Healthy reefs support subsistence fishing, wildlife, and the overall health of our oceans, which produce over 50% of the Earth's oxygen and absorb 30% of global CO2 emissions.

The No Action Alternative should be re-evaluated to reflect these significant benefits, not dismissed as "unchanged or slightly improved."

Mahalo,

Kimmer "Nahonu" Horsen Bighorse

DEIS Comment Letter 0099

Kimmer Horsen <khorsen@my.hpu.edu> 8/7/2025 1:27 AM

Barking Sands Missile Range Kauai and Kokee Observatory EIS

To info@pmrf-kpgo-eis.com

Aloha Navy EIS Officer,

My name is Kimmer Bighorse and have been stationed at Schofield Barracks as a light and heavy wheel diesel vehicle mechanic/Soldier at first in 2008. I have since become a macro social worker for her Majesty Queen Liliuokalani of the Hawaiian Kingdom. I volunteered for the US Army Global war on terrorism in March 2002 where I served in many middle east and overseas tours including Germany, Hawaii, Iraq, Qatar, Texas, California and Afghanistan. Since then, I never in my active duty Army career, witnessed the destruction and neglect of the environment as abuse in Hawaii's oceans, skies, space, and land bases by the United States military.

Native Hawaiians or Kanaka Maoli of the Hawaiian Kingdom have been monitoring their wahi pana land bases such as Barking Missil Range, Kauai, Kokee Observatory, Pohakuloa since 1957. This is why I recommend getting rid of the missile ranges, SONAR test submarine test sites, field artillery ranges, armor combat units from Hawaii entirely as there is simply not enough room for their equipment, personnel or families. Not only that, the hazardous materials, contamination and pollution from such destruction of field training, ordnance detonation contamination is not disposed of properly.

This would never occur in Germany, Iraq, Afghanistan or Kuwait who each have a heavily armed arsenal, military, even terrorist organizations inflicting violence on U.S. military personnel. Germany monitors the United States base environmental impact. Even so, the German Bundeshwehr did not renew their United States military leases, evicted much of the the United States military and downsized US forces.

I recommend downsizing the active duty personnel here on all islands to the bare minimum as the United States is belligerently occupying, pillaging and destroying Hawaii Pae Aina, its people and environment since 1893. The following are specific examples of the war crimes being committed by the United States military to this day.

On June 27, 2025 the Hawaii State Board of Land and Natural Resources voted in opposition to renew all US military leases.

On December 6, 2019, a Pearl Harbor Sailor Machinist Mate Auxilliary Fireman Gabriel Antonio Romero shot two department of defense personnel, injured Roger Nakamine and then shot himself.

On July 12, 2024, PFC Dewayne Johnson murdered and dismembered his wife's body in a trash dumpster on Schofield Barracks Hawaii.

On January 2021 SPC Raul Hernandez Perez struck his wife in the back of the head with a baseball bat, stabbed her in the back then dismembered her body into a trash dumpster on Schofield Barracks Hawaii.

Since 2019 Operation Keiki Shield 18 has the Hawaii ICAC Task force has arrested more than 108 individuals perpetrators and child predators, Marines, Soldiers, Sailors, Coast Guard and Air Force alike. 3 arrests were made during Operation Keiki Shield Kauai.

Under international law, the United States must enforce the laws of the Occupied State, the Hawaiian Kingdom. As such, Barking Sands needs to be de-occupied, decontaminated of UXOs, depleted uranium and any other ordnance in the land, water and oceans by the United States Navy.

The belligerent military occupation and pillaging of such Hawaiian Kingdom lands, oceans, waterways is a an active crime against humanity.

On August 8-16, 2023, Lahaina wildfires killled 108 Lahaina citizens and 2 went missing. The damage has been estimated to be 6 billion while FEMA estimated more than 2200 buildings burned. The United States Navy could have deployed their submarines, cruise ships, destroyers, vessels and planes to assist in putting out the fires and saving countless lives and properties. The United States Navy at both Pearl Harbor and Barking Sands Missile range were apathetic and indifferent while an entire city of men, women, children and pets were torched. Hawaii

DEIS Comment Letter 0099

cannot have such neglect, abuse and blatant apathy present on its sacred lands.

President Bill Clinton confessed, recognized and apologized for the belligerent overthrow of the Hawaiian Kingdom in 1893 but to this day, did nothing to offer remittance or restitution for the war crimes still being committed today.

Navy personnel and military personnel contribute to the sex trafficking industry in Hawaii more than any other occupation. Native Hawaiian wahine suffer an exploitation epidemic at the hand of belligerent occupation.

Kanaka Maoli, Native Hawaiian Opio suffer the most suicide ideation, attempt and lethal suicide more than any other racial and age demographic in Hawaii.

Belligerent military occupation adversely effects the mental, spiritual, physical, and emotional health of all Kanaka Maoli Kingdom subjects: depression, anxiety, loss, homelessness, child abuse, poverty, mental disorders, and mood disorders.

Addiction and houselessness are a result of belligerent occupation, the destruction of the environment, the ocean, the wahi pana, sky pollution, destruction of sacred sites, heiau, burial grounds that adversely effect Hawaiian subjects mental health, the Hawaiian Nationals who experience violent United States Navy military occupation daily.

Native Hawaiians are denied access to their sacred sites, oceans, on bases and military reservations, banned from ensuring the United States Navy disposes and decontaminates its live fire and submarine SONAR exercise training debris.

Dead whales wash up on shore because of the violent SONAR sounds the submarines make causing the whales, honu and endangered Hawaiian monk seals deaf.

I reiterate the United States Navy complies with the endless contamination of our Halawa Shaft on Oahu that hydrates much of Moanalua military personnel, Pearl Harbor and Hickam bases. PFAS has been detected as well as toxic lead at the Army firing range Puuloa in Ewa Beach.

Does the Army really need endless inventories of Abrams, Bradley tanks, heavy armor equipment vehicles, Strykers, 5-ton trucks, Howitzers, Patriot missile launchers for land battles like WWII?

Even though there are other militaries with nuclear powers building up, strategic war planning, and storing their arsenal the world over, the keiki o ka aina would rather restore their lands, oceans, air and space than further contaminate and pollute their sacred water resources and wahi pana. There are other locations for the United States to stock their heavy armor equipment and munitions other than the already overcrowded, overpopulated Oahu, Big Island, Kauai, Maui, Kahoolawe, Lanai and outlying islands such as Polaniku; desserted locations such as the Mojave Desert in California.

I recommend sending EOD expolsive disposal units into clean up the deadly depleted uranium buildup, unexploded ordnance and deoccupy Barking Sands missile range immediately. Allow Hawaiian cultural practitioners, kupuna, Kumu supervise the decontamination.

Do NOT accept the Navy’s version of an environmental impact statement.

E malama pono, Aloha aina, Aloha Wai, Aloha Wakea, Aloha Kanaloa

Kimmer (Nahonu) Bighorse Horsen

10 year United States Army Veteran

Turtle Clan

P.S.

I am submitting this testimony on behalf of myself, as well as in solidarity with Native Hawaiians, environmentalists, water protectors, and all who care deeply about the health of our oceans, the protection of marine life, and the preservation of cultural and sacred practices tied to the moana (ocean). I am deeply concerned about the inadequacies and misleading statements in the Draft Environmental Impact Statement (EIS) and Overseas

DEIS Comment Letter 0099

Environmental Impact Statement (OEIS) for the Hawaii-California Training and Testing (HCTT) activities.

Here is an outline of some of the issues in the documents, hereafter called the EIS or OEIS. It is not comprehensive, because despite regulations that the maximum size of an EIS is 300 pages, this document is 4 volumes long with the first volume alone being over 700 pages. It is a blatant violation of the regulation and makes the document unreadable to community members, but here are some highlights.

The No Action Alternative is Misrepresented

Under § 1502.14, the alternatives section is the heart of the EIS. The No Action Alternative, where the Navy stops military testing and training activities in our waters, is described in the document as resulting in conditions "unchanged or slightly improved from baseline conditions." This is a gross misrepresentation. The No Action Alternative should be evaluated based on the BENEFITS of stopping harmful military activities, not just the absence of harm. Currently the NAVY is running 7,432 activities per year under this EIS in Hawaii alone, according to tables G-16 and G-17.

For example:

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Cultural and Community Benefits: For Kanaka Maoli (Native Hawaiians), the ocean creatures are not just a resource but a relative, as described in the Kumulipo. Constant harm to marine life and intrusions on cultural practices, such as fishing and traditional ceremonies, have profound spiritual and community impacts. Ending military activities would restore the ability of Native Hawaiians to malama ocean relatives and practice cultural traditions.

Reef and Ocean Health: Coral reefs, already under immense stress from climate change, would have a chance to recover if not constantly harmed by Navy activities. Healthy reefs support subsistence fishing, wildlife, and the overall health of our oceans, which produce over 50% of the Earth's oxygen and absorb 30% of global CO_2 emissions.

The No Action Alternative should be re-evaluated to reflect these significant benefits, not dismissed as "unchanged or slightly improved."

Mahalo,

Kimmer "Nahonu" Horsen Bighorse

Her Majesty's Queen Liliuokalani's Macro Social Worker

DEIS Comment Letter 0100

Roslyn Cummings <roslyncummings@ymail.com> 8/7/2025 3:23 AM

Point of Order & Lawful Objection – PMRF-KPGO EIS, Unlawful Militarization of Sacred ‘Āina, Crimes of Omission & Unjust Enrichment

To info@pmrf-kpgo-eis.com • dhhl.planning@hawaii.gov • blnr.testimony@hawaii.gov • governor.green@hawaii.gov • ag.hawaii@hawaii.gov • feedback@ios.doi.gov • publicoutreach@state.gov • senator@hirono.senate.gov • senator@schatz.senate.gov • bar@hawaii.gov Copy
Tia Marie <tiamasaniai@gmail.com> • Nākaiʻelua Villatora <nakai.eolakakouhawaii@gmail.com> • Kiara Lorenzo <kele.eolakakouhawaii@gmail.com> • J. Merrick <malamapono3@gmail.com>

To:

- info@pmrf-kpgo-eis.com
- dhhl.planning@hawaii.gov
- blnr.testimony@hawaii.gov
- governor.green@hawaii.gov
- ag.hawaii@hawaii.gov
- feedback@ios.doi.gov
- publicoutreach@state.gov
- cc: oip@hawaii.gov, bar@hawaii.gov, senator@hirono.senate.gov, senator@schatz.senate.gov

To All Agencies and Responsible Parties:

I submit this communication not as a public comment, but as a lawful objection, formal notice, and Point of Order under Rule of Law, Treaty Law, and Exclusive Equity Jurisdiction.

POINT OF ORDER:

DEIS Comment Letter 0100

This proceeding — the PMRF-KPGO Radar Enhancements EIS and all associated expansions — is out of order, unlawful, and without proper jurisdiction or consent from the lawful heirs and trustees of the Hawaiian Kingdom and the ʻāina in question.

The agencies listed above are knowingly participating in crimes of omission, unlawful enrichment, and ongoing desecration of sacred lands, burial systems, and life-giving aquifers under federal trust law, international law, and the 1826 unratified Treaty and 1849 ratified Treaty between the Hawaiian Kingdom and the United States.

NOTICE OF LAWFUL OBJECTION:

I object to:

- All proposed expansions at PMRF and NASA, including 22 ground troop invasions, 26 amphibious landings, and Osprey-related aerial assaults on sacred land. Renewal of lease and or purchases of land not belonging to— based on subject matter jurisdiction. No EIS survey will cover for the fraudulent use if Land within the territory of Ko Hawaii Pae Aina known as the Hawaiian Kingdom
- Continued desecration of iwi kūpuna, papa reefs, wai (freshwater systems), lava tube cave ecosystems, ʻAina waiwai natural resources, nutrients, and imprints
- Use of Kauaʻi for classified missile and hypersonic weapons testing under Sandia Labs and the Department of Energy
- Drawdown of sacred water sources and compression of aquifer percolation zones from missile cooling infrastructure
- Any attempt to treat this as a procedural “comment” rather than a claim of standing, jurisdiction, and notice of legal violation

WE DO NOT CONSENT.

DEIS Comment Letter 0100

We are not “stakeholders.”

We are not “commenters.”

We are lawful heirs and trustees, serving notice of standing, not opinion.

LEGAL FRAMEWORK:

This notice is issued under:

- Hawaiian Kingdom Law (1839 Declaration of Rights, 1840 Kanawai, 1848 Māhele, 1850 Kuleana Act)
- Treaty Law (1826 U.S.–Hawaiʻi Treaty; 1849 Treaty of Friendship, Commerce & Navigation)
- Trust Law (Hawaiian Homes Commission Act §209, U.S. Admission Act §5(f))
- International Law (UNDRIP, Geneva Conventions)
- Maxims of Law (Fraud vitiates all, Let justice be done though the heavens fall)

EVIDENCE OF VIOLATIONS:

1. Crimes of Omission: Failure to disclose harm to aquifers, ecosystems, burials, and native access under NEPA, NHPA, and international law
2. Unjust Enrichment: Profiting from desecrated lands without rightful chain of title, restitution, or consent
3. Fraudulent Jurisdiction: Conducting foreign operations on Hawaiian Kingdom soil under color of law, while the political status remains unresolved
4. Constructive Fraud & Conversion: Taking sacred waters, land, and life systems under false authority

DEIS Comment Letter 0100

5. Environmental Collapse: Disruption of lava tubes, caves, endemic species, coral, and groundwater through launch activity and infrastructure

RELIEF & REMEDY DEMANDED:

1. Cease and Desist all military expansion, testing, and lease renewals at PMRF, KTF, and related areas
2. Full Disclosure of underground, coastal, and aerial operations, including classified contracts and missile data
3. Remediation & Repatriation of desecrated ʻāina, wai, and iwi kūpuna
4. Return of Title to Kānaka Maoli under rightful equity and treaty jurisdiction
5. Recognition of Standing of lawful heirs under Equity and Trust Law

SUPPORTING RECORD:

- Bureau of Conveyances Filings
- Verified Equity Lawsuits (Fifth Circuit)
- Treaties and Constitutional Documents
- Ongoing violations documented by SHPD, EA filings, public health reports

This notice will be submitted into the public record and will be used in all future legal proceedings, filings to the UN, the ICJ, and public international law forums.

We say again:

We are not voices echoing in a void.

DEIS Comment Letter 0100

We are the living heirs of this ʻāina — and this ʻāina hears us.

We do not consent to our homelands being laboratories of death.

We do not consent to our aquifers being weapons testing zones.

We do not consent to lies masked as law.

He Kūʻē Kēia. This is a stand. This is a lawful objection.

Signed:

Roslyn; Cummings, Trustee and Lawful Heir

Malama:Cummings ʻOhana God Trust©

Kalaheo, Hawaiʻi Nei

Notice to Agent is Notice to Principal.

DEIS Comment Letter 0101

John Wilks <johnewilksiii@windstream.net> 8/7/2025 12:12 PM

Public Comment DEIS PMRF & FPGP 30-Year Lease

To info@pmrf-kpgo-eis.com

Timely Filed 10:12 MST

- CMTDEISWestKaua'iw2.docx (28 KB)

DEIS Comment Letter 0101

Veterans For Peace

Uranium Weapons, Cluster Munitions, and Land Mines Working Group

John E. Wilks, III
President, Chapter #63 (Albuquerque)
Co-Chair, Working Group (Uranium Weapons)
1115 Republic Road
Winston, NM 87943

August 7, 2025 Via Email: info@PMRF-KPGO-EIS.com

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attention: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

RE: Public Comment on the Engineering Systems Command's Draft Environmental Impact Statement (DEIS) Regarding the Proposed Renewal of a 30-Year Lease on West Kauai'i for the Continued Use By the Pacific Missile Range Facility (PMRF) and the Koke'e Park Geophysical Observatory (KPGO).

Dear Ms. Ling:

Our Working Group timely files this comment opposing the renewal of a 30-year lease of more than 8,000 acres on West Kaua'i currently occupied by the Pacific Missile Range Facility (PMRF) and the Koke'e Park Geophysical Observatory (KPGO). We believe the DEIS is defective in that it is incomplete and that no serious consideration of the proposed 30-year lease should continue until the DEIS is amended or withdrawn.

We understand that the land subject to the proposed lease is not only sacred land, but also land stolen by the United Stated government in 1893. Native Hawai'ians assert the subject parcel encompasses sovereign lands and waters of the State of Hawai'i. This area has been illegally occupied for more than a

century. It must be restored to its pre-occupation condition then returned to the people of Hawai'i.

The lease renewal, subject to the Draft Environmental Impact Statement (DEIS) is the third in a series of similar proposals made by the government within the past 90 days. Recently we opposed the US Army's long-term lease proposal of the Pohakuiloa Training Area, Kahuku Training Area, Kawailoa-Poamoho Training Ares, and the Makua Military Reservation for many of the same reasons we oppose the current lease proposal by the US Navy. Renewal of this lease should be denied for the reasons as follows:

1. The lands may have sacred burial sites, cultural sites, endangered or threatened species habitats, and adverse consequences on critical fresh water sources or ocean ecosystems.

2. The Navy has not shown that it conducted full archaeological and cultural surveys of the lands, as required by the National Environmental Policy Act (NEPA).

3. The DEIS ignores key alternatives (such as shorter lease terms or no military use).

4. The federal government's use may cause environmental damage and further desecration of sacred lands.

5. The Navy has failed to analyze potential affects on climate change impacts or long-term community health.

6. These lands are not subject to lease agreements as they are the commons within the tradition lands of the Native Hawai'ian indigenous peoples.

We strongly advocate for clean-up and restoration of both sites and removal of all traces of government colonization of Hawai'ian lands and waters since annexation in 1898 and, subject to the current lease, should commence as soon as possible, but not later than the expiration of the current lease periods.

The justification by the military for the state to lease militarized areas is specious. The US government is provoking and planning a general military conflict with China. To that end, it considers the training, administrative, and scientific study areas in Hawaii'i essential for the training of its own forces and those of its foreign vassals. Hawai'i is considered a forward base in the Indo-Pacific Region in the military's march toward China.

Our Working Group understands, as in New Mexico, members of your Congressional delegation, the state Governor, and many members of your state legislature may support the US Government's outrageous proposal. Under the banner of national patriotism, retention of jobs, economic benefits, and traditional accommodation of the military, officials may believe it is in State's best interest to lease the areas for another 30 years. We adamantly disagree.

We urge the US Navy to withdraw the proposed lease agreement or abandon the subject sites, or amend the DEIS.

Respectfully submitted,

John E. Wilks, III
Co-Chair Veterans Fo Peace Working Group (Uranium Weapons)
President, Chapter #63 (Albuquerque)
johnewilksiii@windstream.net
(575) 743-0477

DEIS Comment Letter 0102

Scott Whitmarsh II <stwhitmarsh@gmail.com> 8/7/2025 12:17 PM

Testimony

To info@pmrf-kpgo-eis.com

Aloha Kākou

This is my testimony and I am demanding no new leases, accountability for environmental and cultural harm, comprehensive cleanup and restoration, and return of ʻāina to Kānaka Maoli.

Mahalo!
Scott

Sent from Gmail Mobile

DEIS Comment Letter 0103

Erin Rutherford <erinrutherford815@gmail.com> 8/7/2025 4:06 PM

Kauai leases

To info@pmrf-kpgo-eis.com

Hello,
I am writing in opposition to the proposed 30 year leases on Kauai for the following reasons. We should not be using native, sacred land for these purposes. This land was stolen and should be returned to the native community.

-Accountability for environmental and cultural harm
-we need comprehensive cleanup and restoration
-we should return the ʻāina to Kanaka Maoli

DEIS Comment Letter 0104

Nākaiʻelua Villatora <nakai.eolakakouhawaii@gmail.com> 8/7/2025 4:11 PM

Point of Order & Lawful Objection - Agenda Item PMRF-KPGO EIS

To info@pmrf-kpgo-eis.com • dhhl.planning@hawaii.gov • blnr.testimony@hawaii.gov • governor.green@hawaii.gov • ag.hawaii@hawaii.gov

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[Notice to Agent is Notice to Principal, Notice to Principal is Notice to Agent]

Notice Attached is for the Record to be recorded at Public Notice, Point of Order & Lawful Objection from Nākaiʻelua Villatora hoʻoilina kū i ke kanawai ʻo Ko Pae ʻĀina Hawaiʻi in Good Faith, Without Prejudice, and Without Unlawful Recourse.

Me ka ʻoiaʻiʻo a me ka akaaka.

- Point of Order & Lawful Objection : PMRF-KPGO EIS.docx (12 KB)

Point of Order & Lawful Objection

[Notice to Agent is Notice to Principal, Notice to Principal is Notice to Agent]

Agenda Item: PMRF- KPGO EIS

To All Agencies and Responsible Parties:

I, Nākaiʻelua Villatora hoʻoilina kū i ke kanawai submit this notification not as a "public comment" but as a Lawful Objection, Formal Notice, and Point of Order under Rule of Law, Treaty Law, and Nā Kumu Kanawai o Ko Pae ʻAina Hawaiʻi.

POINT OF ORDER:

The PMRF-KPGO Radar Enhancements EIS and all associated expansions are out of Order, Unlawful, and without Proper Jurisdiction or Consent from hoʻoilina kū i ke kanawai (Lawful Heir) of Ke ʻAupuni Hawaiʻi (Hawaiian Kingdom) Ko Pae ʻAina Hawaiʻi and ʻāina in question.

All responsible agencies are knowingly participating in crimes of omission, unlawful enrichment, and ongoing desecration of ʻāina kapu, pā ʻilina, kumu waiwai hawaiʻi, pūnāwai that are protected under federal trust law, international law and the 1836 unratified Treaty and 1849 ratified Treaty between Ke ʻAupuni Hawaiʻi Ko Pae ʻAina Hawaiʻi and the United States of America.

NOTICE OF LAWFUL OBJECTION:

I, Nākaiʻelua Villatora hoʻoilina kū i ke Kanawai Hawaiʻi Objection to:

- All proposal expansions at PMRF and NASA.
- Renewal of lease and/or unlawful "purchases" of ʻāina not belonging to the United States of America and is still held in trust under the Great Māhele rightfully belonging within Ko Pae ʻAina Hawaiʻi.
- Continuous desecration of iwi kūpuna, papapa, wai, ana pele, ʻaina kumu waiwai, etc.
- Any attempt to use this as a procedural "comment" rather than a Claim of Standing and Jurisdiction.

I DO NOT CONSENT

I am are not "stakeholders"
I am are not "commenters"
I am hoʻoilina kū i ke kanawai and trustees, serving Notice of Standing, not opinions.

LEGAL FRAMEWORK:

- Hawaiian Kingdom Law (1839 Declaration of Rights, 1840 Kumu Kanawai, 1848 Great Māhele, 1850 Kuleana Act)
- Treaty Law (1826 Hawai‘i Treaty with U.S.; 1849 Treaty of Friendship, Commerce & Navigation)
- Trust Law (Hawaiian Homes Commission Act, U.S. Admission Act)
- International Law (UNDRIP, Geneva Conventions)
- Maxims of Law (An Act of God does wrong to no one, cause no injury; Where truth is, fiction of law does not exist)

REMEDY DEMANDED:

I, Nākai‘elua Villatora demand remedy of cease of all military expansion, testing and lease renewal at PMRF, KTF, and all associated areas. Full disclosure of all operations including classified. Remediation of ‘aina and wai. Repatriation of desecrated iwi kupuna. Return of Lawful Title to Kanaka Maoli and ho‘oilina kū i ke kanawai. Recognition of Standing of ho‘oilina kū i ke kanawai.

THIS WILL BE SUBMITTED AS A PUBLIC NOTICE ON RECORD FOR ANY FUTURE STANDING.

Ke Kū Kanawai No Laila
The Law still Stands
Ma lalo o ka malu o IO a palekana i ka ‘oia‘i‘o a me ke kanawai
Under the protection of IO a safeguard of the truth and law

Nākai‘elua Villatora, ho‘oilina kū i ke kanawai Hawai‘i
Kalaheo, Kaua‘i, Ko Pae ‘Aina Hawai‘i

DEIS Comment Letter 0105

Shyanne Olores <officialshykane@gmail.com> 8/7/2025 4:37 PM

Point of Order

To info@pmrf-kpgo-eis.com

I, Shyanne Olores, a Kanaka Maoli and descendant of Mana, Nohili, and the Hawaiian Kingdom, submit this testimony as a formal Point of Order, Lawful Objection, Notice of Fact, and Declaration of Truth. I object to the lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kauaʻi. This testimony is submitted on the record in defense of the land, people, and rightful sovereign status of Hawaiʻi.
As a descendant of Mana, my lineage, rights, and responsibilities to this ʻāina are protected by both natural law and international law. My grandparents were the last of our ʻohana to reside in Mana town. I was raised in Nohili, fishing and gathering, visiting the dunes where my ancestors — our iwi kupuna — are buried. My father and his brothers hunted in the Mana tunnels to feed our family. These lands are not abstract to me — they are my genealogy, my truth, my kuleana.

This land — and all lands under PMRF — remain the territory of the Hawaiian Kingdom. I give Notice of Fact: The illegal overthrow of the Hawaiian Kingdom in 1893 was acknowledged by the U.S. government in the 1993 Apology Resolution. No treaty of annexation was ever ratified. Therefore, the United States has no legal claim to the lands it currently occupies at PMRF.

I declare that the presence of the U.S. military on Hawaiian Kingdom lands constitutes ongoing illegal occupation. There is no lawful lease to renew. You cannot lease what was stolen. This land was never ceded. Kanaka Maoli have never relinquished our claims. The United States has no jurisdiction here.

Over the past seven years, seven members of my ʻohana from Mana and Kekaha have died from cancer. Each of them worked in agriculture on the west side of Kauaʻi. These are not isolated incidents. They are the result of environmental violence committed by the U.S. military. PFAS — forever chemicals — were identified in PMRF soil and groundwater as far back as the 1960s. And yet, no cleanup has occurred. The Navy's promise of 'remediation forthcoming' is not a solution — it is a continuation of harm. I object to the poisoning of our land and people under the guise of national security.

I further give Notice of Fact that the Draft Environmental Impact Statement fails to account for cumulative impacts — including those of RIMPAC, live-fire drills, missile tests, and global weapons transfers that are directly linked to U.S. military activity at PMRF. The DEIS ignores environmental, cultural, and international legal consequences. This is not oversight — it is systemic erasure.

As a Kanaka Maoli with ancestral ties to this land, I reject all options within this DEIS. I do not consent to continued occupation, expansion, or mitigation. I invoke my inherent rights to land, culture, and life.

Therefore, I declare the following lawful demands:
1. The immediate termination of all military leases and operations on Hawaiian Kingdom land at PMRF.
2. Full cleanup of PFAS, fuel, and hazardous waste contamination.
3. Restoration of sacred sites, including the dunes at Nohili.
4. Full return of all lands under PMRF to the rightful stewards — the Kanaka Maoli.

The U.S. military's continued presence on these lands, without consent, constitutes an act of aggression. It violates the principles of international law, natural law, and the rights of Indigenous peoples as outlined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

This is not America. This is the Hawaiian Kingdom. These are our lands. I stand in lawful objection, and I do so with the authority of my kūpuna behind me. I will not be silent while our people die and our lands are desecrated.

He Hawaiʻi au. I do not stand alone.

Submitted in truth, honor, and defense of the ʻāina,

Shyanne Olores

DEIS Comment Letter 0106

Paulette Morrissey <savvystickler@gmail.com> 8/7/2025 6:10 PM

Public Comment

To info@pmrf-kpgo-eis.com

I am writing to express my strong opposition to the proposed 30-year leases for over 8,000 acres of Hawaiian lands on Kauaʻi for the Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory.

The Draft Environmental Impact Statement (EIS) you've provided is wholly insufficient and fails to assess the full scope of harm these projects inflict. It completely ignores significant impacts on our **land, water, ocean ecosystems, endangered species, and sacred sites**. Furthermore, there is no meaningful analysis of **climate change** or acknowledgment of the ongoing **desecration, militarization, and environmental racism** these projects perpetuate.

We cannot and will not accept an incomplete assessment that disregards the well-being of our environment and the health of our Peoples. The continued occupation and use of these lands without proper accountability is unacceptable.

Therefore, I demand that you withdraw your applications for these new leases. We also require a commitment to a full **cleanup and restoration** of the lands already impacted and the immediate **return of 'āina to Kānaka Maoli**.

Sincerely,

Paulette Morrissey

"There is no sadder sight than young pessimist"
~Mark Twain~

DEIS Comment Letter 0107

Tia Marie <tiamasaniai@gmail.com> 8/7/2025 7:22 PM

Hawai‘i Peace & Justice Written Testimony for the Kauai PMRF Draft Environmental Impact Statement

To info@pmrf-kpgo-eis.com Copy Moana Masaniai <moanamasaniai3@gmail.com> • Bryce Takenaka <brycetakenaka098@gmail.com> • Joy Enomoto <joyenomo@gmail.com>

To whom it may concern in this Draft EIS process, please respond acknowledging you have received this email and it‘s attachment on behalf of Hawai‘i Peace & Justice.

E iho ana ‘o luna
E p‘i ana ‘o lalo
E hui ana nā moku
E kū ana ka paia

That which is above shall be brought down
That which is below shall be lifted up
The islands shall be united
The walls shall stand upright

Mahalo,
Tia Marie Namahana Masaniai-Estrera
Lead Youth Organizer
Hawai‘i Peace & Justice

- HPJ Kauai PMRF DEIS Official Written Testimony 2025.pdf (457 KB)

Hawai‘i Peace and Justice

Draft Environmental Impact Statement (DEIS) Written Testimony for the U.S. Navy and NASA Land Retention at PMRF and KPGO, Kaua‘i

Submitted: August 7, 2025

To:
Kerry Ling
PMRF and KPGO REIS Project Manager
NAVFAC Hawai‘i
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

Sheri Miller
NASA Goddard Space Flight Center
34200 Fulton Street
Wallops Island, VA 23337

Subject:

Formal Written Testimony on the Draft Environmental Impact Statement (DEIS) for Proposed U.S. Navy and NASA Land Retention at PMRF and KPGO, Kaua‘i

Introduction

We submit this testimony to document specific legal, cultural, environmental, and procedural deficiencies within the Draft Environmental Impact Statement (DEIS) submitted by the U.S. Navy and NASA on June 20, 2025, regarding proposed long-term retention of lands at the Pacific Missile Range Facility (PMRF) and the Kōke‘e Park Geophysical Observatory (KPGO) on Kaua‘i.

These lands are not merely administrative parcels—they are **Crown and Government Lands of the Hawaiian Kingdom**, held under public trust. They were never lawfully ceded by treaty and carry sacred, ecological, and cultural significance. As such, the DEIS cannot be allowed to move forward without addressing the critical gaps identified herein.

Our intent is not to offer simple opposition, but to **raise precise, lawful, and necessary questions** that this DEIS has failed to answer, and which must be resolved before any project advancement can be responsibly considered.

1. What Assessments Have Been Conducted on Environmental Hazards?

- What monitoring has been done for **PFAS contamination**, especially following the known C-130 aircraft fire?
- What testing has been performed for **perchlorate**, a known missile propellant contaminant?
- Where is the testing data related to **underground fuel tanks** storing JP-8, benzene, and other solvents?

If these studies have not been completed, how can the DEIS claim to account for cumulative and long-term impacts under **NEPA and HRS §343**?

2. What Climate Risk Modeling Has Been Applied?

- Why does the DEIS not incorporate projections from the **Hawai‘i Climate Commission**?
- What sea level rise or storm surge data has been used to assess risk to PMRF infrastructure located on coastal sands?
- What contingency or adaptation strategies are proposed for climate threats through 2100?

Without these disclosures, the environmental impact assessment is materially incomplete.

3. Where Is the Cultural Integrity in This Process?

The DEIS fails to meet the **Ka Pa‘akai** framework and misrepresents Hawaiian culture as static “archaeological resources.”

Questions that must be addressed:

- Have ethnographic interviews been conducted with lineal descendants regarding **leina a ka ‘uhane** and **iwi kūpuna**?
- How will surveillance, noise, and explosive testing affect **subsistence, ceremonial, and spiritual practices** tied to this land?
- Have the spiritual dimensions of the **muliwai** ecosystem been included in the cultural impact analysis?

Without pa‘akai analysis, the DEIS cannot meet state-level review standards.

4. What Data Supports Public Access Claims?

- What protocols ensure cultural practitioners are not surveilled or denied access?
- What legal mechanism ensures that “general access” is not arbitrarily revoked during test periods?

If no such protections exist, public access cannot be meaningfully claimed.

5. What Are the Real Economic Impacts?

- Has the Navy assessed how military use of these lands affects **cost of living, food security, and land access** on Kauaʻi?
- What is the economic value of alternative land uses—such as regenerative agriculture or clean energy—that are foreclosed by long-term military retention?

Framing this proposal as the only viable economic path disregards opportunity costs and manipulates the narrative.

6. Why Is Alternative #2 (Military Retention with Modifications) Being Considered for Trust Lands?

Alternative #2 proposes the continuation of military use with expanded operations. However:

- **These lands are held in trust** under the Hawaiʻi State Constitution and Admission Act §5(f)
- **Native Hawaiians are legal beneficiaries** of this trust
- The State is a **trustee**, not an owner with unrestricted leasing rights

Key questions:

- Has the State evaluated whether Alternative #2 constitutes a breach of fiduciary duty to beneficiaries?
- Has the Navy assessed whether this alternative violates the core purpose of the land as outlined in trust law?

These are not administrative technicalities—they are legal obligations that cannot be waived.

7. How Do Weapons Tested at PMRF Contribute to Global Harm?

- What safeguards are in place to ensure that missile and drone systems tested at PMRF are not used in human rights violations overseas?

- Given documentation by **Amnesty International** and **Human Rights Watch** of U.S. weapons being used in Gaza, Yemen, and Iraq, what ethical review is applied to PMRF-linked programs?
- How are contracts with companies like Lockheed Martin and Raytheon being assessed for international law compliance?

If the DEIS fails to examine these consequences, it overlooks the global cost of local militarization.

Recommendations

We request the following actions:

1. That the **State and Federal agencies not proceed** any further with this EIS process until all data gaps, legal questions, and cultural deficiencies are remedied
2. That a full **Environmental and Cultural Impact Statement (ECIS)** be initiated under state law with inclusive community participation
3. That trust land status and fiduciary obligations be **legally reviewed in light of Alternative #2**
4. That **PFAS, perchlorate, and aquifer health** be independently tested and publicly disclosed
5. That all cultural sites be mapped, protected, and guaranteed **non-conditional access** under enforceable policy

Conclusion

This written testimony is submitted to identify substantial procedural, legal, and ethical deficiencies in the DEIS. We implore decision-makers to honor their kuleana—not only to current regulatory frameworks, but to future generations, the ʻāina itself, and the law of the land as rooted in trust, treaty, and pono.

He aliʻi ka ʻāina, he kauwā ke kanaka.

With unwavering clarity and responsibility,
Hawaiʻi Peace and Justice

DEIS Comment Letter 0108

Alison Togioka <atogioka@kauai.gov> 8/7/2025 7:31 PM

PMRF Comments - County of Kauai, Department of Public Works

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> •
Kaulana.k.mossman2.civ@us.navy.mil <kaulana.k.mossman2.civ@us.navy.mil> Copy
Troy Tanigawa <ttanigawa@kauai.gov> • Boyd Gayagas <bgayagas@kauai.gov> •
Michael Moule <mmoule@kauai.gov> • Bryan Wienand <bwienand@kauai.gov> •
Reiko Matsuyama <rmatsuyama@kauai.gov>

Aloha~

Attached are our comments for the draft EIS for PMRF.

Please review and let us know if you should have any questions.

Mahalo!

Alison Togioka
Department of Public Works
4444 Rice Street, Suite 275
Līhu'e Hawai'i 96766

Phone: (808)241-4996
Email: atogioka@kauai.gov

PMRF Comments - County of Kauai, Department of Public Works.pdf (820 KB)

DEIS Comment Letter 0108

ENGINEERING DIVISION
DEPARTMENT OF PUBLIC WORKS
TROY K. TANIGAWA, P.E., COUNTY ENGINEER
BOYD GAYAGAS, DEPUTY COUNTY ENGINEER

DEREK S.K. KAWAKAMI, MAYOR
REIKO MATSUYAMA, MANAGING DIRECTOR

August 5, 2025

Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attention: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860
Attention: Ms. Kerry Ling (info@PMRF-KPGO-EIS.com)

Subject: Request for Chapter 343, Hawai'i Revised Statutes Consultation
U.S. Navy and NASA Draft Environmental Impact Statement for Continued Use of State Lands
Navy Pacific Missile Range Facility and NASA Koke'e Park Geophysical Observatory

To Whom It May Concern:

We have reviewed the subject request and draft Environmental Impact Statement via the project's website at www.PMRF-KPGO-EIS.com. We offer the following comments:

1. The applicant shall comply with all provisions of the "Sediment and Erosion Control Ordinance No. 808" to safeguard public health, safety, and welfare, to protect property, and to control soil erosion and sedimentation. Please note that per Kaua'i County Code 22-7.6(a), the permit requirements of Ordinance No. 808 may be exempted for "*work in a public street, sidewalk, alley, right-of-way, or in an isolated, self-contained government controlled area*".
2. During construction, best management practices (BMPs) shall be incorporated to the maximum extent practicable to prevent damage by sedimentation, erosion, or dust to watercourses, natural areas, and other properties. The permittee and the property owner shall be responsible for ensuring that BMPs are satisfactorily implemented at all times.
3. We support and value PMRF and NASA's presence on Kaua'i. Thank you for your continued service to our community.

Should you have any questions, please contact our Regulatory and Construction Compliance Section Head, Bryan Wienand, at (808) 241-4896 or bwienand@kauai.gov.

Sincerely,

Michael Moule, P.E.
Chief, Engineering Division

BW

DEIS Comment Letter 0109

Luke J Sarvis <luke.j.sarvis@hawaii.gov> 8/7/2025 8:00 PM

Department of Land and Natural Resources Comments on PMRF KPGO DEIS

To INFO@PMRF-KPGO-EIS.COM <info@pmrf-kpgo-eis.com>

Aloha,

Please find attached the Department of Land and Natural Resources' comments on the U.S. Navy Pacific Missile Range Facility and NASA Kōke'e Park Geographical Observatory Real Estate Draft Environmental Impact Statement Located in Kekaha and Kōke'e on the Island of Kaua'i Tax Map Key(s): (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1- 2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4)1-2- 002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)

Mahalo,

Luke Sarvis
Office of the Chairperson
Department of Land and Natural Resources
1151 Punchbowl Street, Room 131
(808)291-5047

- 2025-08-07 PMRF DEIS_DLNR ESIGN (part 1) - signed.pdf (5 MB)

DEIS Comment Letter 0109

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

P.O. BOX 621
HONOLULU, HAWAII 96809

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

CIARA W.K. KAHAHANE
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

August 7, 2025

Ms. Kerry Ling
NEPA Project Manager
400 Marshall Road
Building X-11
Pearl Harbor, HI 96860

Via Email: info@PMRF-KPGO-EIS.com

Subject: Comments on the U.S. Navy Pacific Missile Range Facility and NASA Kōke'e Park Geographical Observatory Real Estate Draft Environmental Impact Statement Located in Kekaha and Kōke'e on the Island of Kaua'i Tax Map Key(s): (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1- 2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2- 002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)

Aloha Ms. Ling,

On behalf of the Department of Land and Natural Resources (DLNR), I am submitting our consolidated comments on the U.S. Navy Pacific Missile Range Facility (PMRF) and NASA Kōke'e Park Geographical Observatory (KPGO) Real Estate Draft Environmental Impact Statement (DEIS). DLNR's divisions have thoroughly reviewed the DEIS and offer the following substantive concerns and recommendations to ensure a comprehensive assessment of the proposed retention areas. Detailed comments from each division are attached for your reference.

1. **Land Division (LD):** LD is concerned that the DEIS does not meet the requirements of Chapter 11-200.1, Hawaii Administrative Rules (HAR). The revisions necessary to meet these requirements will likely trigger republication to allow for further agency and public review and comment. LD's primary concerns include the discrepancy between the described scope and the actual extent of the proposed action, the biological studies lack of sufficient detail to assess the potential impacts on special-status species, and the archeological inventory survey (AIS) lack of proposed mitigation strategies to comply with Section 6E-8, Hawaii Revised Statutes (HRS). In addition, LD provides extensive comments addressing specific concerns throughout the document.

2. **Commission on Water Resource Management (CWRM):** CWRM notes concerns regarding military use of State lands and the associated risk of groundwater degradation, which could reduce the broader availability of potable water.

3. **Division of Aquatic Resources (DAR):** DAR remains concerned for protected species such as the Hawaiian monk seal and green sea turtle that frequent the beach adjacent to the base as well as the potential for storm water runoff. DAR acknowledges that best management practices currently followed by PMRF personnel are sufficient to prevent take of these protected species and encourages their continued application. DAR also expresses concerns regarding the Navy's ongoing and proposed offshore activities and the related analysis contained in the Navy's 2024 Draft Environmental Assessment covering PMRF's land-based training and testing activities.

4. **Division of Forestry and Wildlife (DOFAW):** DOFAW questions whether the DEIS fulfills the intent of Chapter 343, HRS, to thoroughly identify and describe all potential environmental impacts. Of the alternatives proposed, DOFAW prefers Alternative 1 and the No Action Alternative and does not support Alternative 2. DOFAW urges the Navy to assist in providing public recreational and hunting access and continue its ungulate control measures. DOFAW recommends that the Final EIS (FEIS) more thoroughly address topics such as wildland fire risk, invasive species control, and management of native plant and animal populations, including terrestrial invertebrates and pollinators. Furthermore, the FEIS should contain a more robust analysis of the impact standard, authorized take, and minimization and mitigation actions for federally listed plants and animals to assist DOFAW in its evaluation of local and cumulative environmental impacts on each listed species and its habitats.

5. **Office of Conservation and Coastal Lands (OCCL):** OCCL questions the accuracy of the DEIS regarding the permitting history of PMRF and KPGO as several statements in the DEIS contradict OCCL's permit records regarding facilities, utilities, and land uses on State leased land and easements within the Conservation District. OCCL asks for clarification regarding the DEIS' contradictory language regarding the Navy's stated use of broad ocean areas and its decision not to analyze the ocean right-of-way it currently holds and has indicated it intends to continue to use beyond the expiration of the existing lease. OCCL believes that the Navy's continued use of these areas for research, development, testing, and evaluation could potentially contaminate ocean resources and should be analyzed. The DEIS notes that the affected environment is considered the baseline environment without the Proposed Action. OCCL comments that the impact of the existing improvements should be analyzed as they pose significant threats of environmental degradation, particularly erosion of ridges and related shoreline contamination. Regarding KPGO, OCCL questions whether NASA's provision of a use permit to the Navy for use of State land held under General Lease No. 3917 is appropriate and requests that the FEIS clearly explain NASA's authority to do so without the express approval of the Lessor.

6. **State Historic Preservation Division (SHPD):** SHPD notes that the DEIS lacks clarity regarding mitigation measures for the eight significant archaeological sites identified in the AIS. The DEIS and FEIS should contain proposed mitigation strategies for significant archeological sites and clear documentation of SHPD concurrence regarding the significance of all evaluated sites. SHPD recommends robust consultation and collaboration with Native Hawaiian Organizations, cultural practitioners, lineal descendants, and community stakeholders in the preparation of the FEIS and requests to be consulted prior to any construction or land-altering activities.

7. **Division of State Parks (DSP):** DSP is a neighbor of both PMRF and KPGO and would like to formalize and expand existing use agreements for the mutual benefit of all parties. These include

use of the State leased land, water infrastructure and service, and existing infrastructure and buildings. Use of a portion of the State leased land at KPGO for helicopter operations is critical to DSP's ongoing operation and maintenance of the Nāpali Coast State Wilderness Park and allowing DSP to convert currently unused land and buildings into a base yard would greatly enhance its management capacity. Finally, DSP echoes LD's concerns regarding large capacity cesspools and reiterates that these systems must be upgraded to septic systems in compliance with Hawaii State Department of Health standards.

DLNR appreciates the opportunity to comment on this DEIS. We encourage the Navy and NASA to integrate these comments and the attached letters from each division into the FEIS to ensure accurate, complete, and transparent environmental review

Mahalo,

Ryan K. P. Kanaka'ole
First Deputy, Department of Land and Natural Resources

Attached Comment Letters:

1. Land Division
2. Commission on Water Resource Management
3. Division of Aquatic Resources
4. Division of Forestry and Wildlife
5. Office of Conservation and Coastal Lands
6. State Historic Preservation Division
7. Division of State Parks

DEIS Comment Letter 0109

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA

DAWN N. S. CHANG
CHAIRPERSON
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COMMISSION ON WATER RESOURCE MANAGEMENT

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA
LAND DIVISION

P.O. BOX 621
HONOLULU, HAWAII 96809

July 28, 2025

MEMORANDUM

TO: Dawn N.S. Chang,
Chairperson

FROM: Ian Hirokawa,
Acting Administrator, Land Division

SUBJECT: **Comments on the U.S. Navy Pacific Missile Range Facility and NASA Kōke'e Park** Geographical Observatory Real Estate Draft Environmental Impact Statement **Located in Kekaha and Kōke'e on the Island of Kaua'i**
Tax Map Key(s): (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)

The Land Division reviewed the subject document and notes that while the subject document is a joint National Environmental Policy Act (NEPA)/Hawai'i Environmental Policy Act (HEPA) document, the Land Division offers comments specifically as the document relates to the HEPA process as prescribed in Hawai'i Revised Statutes (HRS) Chapter 343 and Hawai'i Administrative Rules (HAR) Chapter 11-200.1.

After review of the document, the Land Division has concerns that the document, as currently written, does not meet the requirements of Chapter 11-200.1, HAR as discussed below. Further, the Land Division suspects that even if all of the issues noted below are corrected, the revised document would be much different from the current DEIS and the DEIS would need to be republished to provide further agency and public review and comment. Please be aware, should the Applicant choose to move forward with a Final EIS and not correct the noted issues, Staff may recommend non-acceptance of the Final EIS before the Board of Land and Natural Resources (Board).

Our concerns as they relate to compliance with Chapter 11-200.1, HAR include the following:

- Pursuant to Section 11-200.1-24(a), HAR, the contents of a Draft Environmental Impact Statement (DEIS) "*shall fully declare the environmental implications of the proposed action and shall discuss all reasonable foreseeable consequences of the action.*" Further, Section 11-200.1-24(l), HAR states that "*The draft EIS shall include an analysis of the probable*

impact of the proposed action on the environment…This analysis shall include…consideration of all consequences on the environment, including direct and indirect effects."

Currently, the Applicant has defined the proposed action as the retention of "*8,172 acres of state lands on Kaua'i in support of continued military training and testing at PMRF. NASA proposes to retain the use of 23 acres of state lands on Kaua'i in support of maintaining data collection efforts of global significance at KPGO. The proposed action includes current operations that occur on leasehold and easement lands.*"

Staff disagrees with this depiction of the proposed action as we believe the scope of the proposed action to be much larger. Staff believes and has communicated to the Applicant and their contractors on numerous occasions, that the scope of the proposed action should include the continuation of any training and testing that is facilitated by the retention of the State-owned lands. This may include training and testing activities on what the Applicant refers to as the fee simple lands, or Main Base, as well as any training and testing activities that occur out in open waters.

Our request to expand the scope of the proposed action is further justified by the Applicant's statement in Section 1.1 which states that "*Navy use of these lands is required to maintain technological and safety capabilities supporting PMRF training and testing.*" Further justification is provided in the Applicant's discussion under their "No Action Alternative" scenario (Section 2.3.3). In this section, the Applicant states that "*The Navy would not be able to conduct a substantial portion of training and testing events at PMRF supported by the leasehold and easement lands.*" In addition, Table 2-4 summarizes the effects that non-retention of the State lands would have on the PMRF training and testing mission. Effects of the loss of the State-owned lands appear to reduce the Applicant's capacity to conduct certain training and testing missions and therefore, the continuing impacts as a result of these activities should be analyzed and disclosed in the DEIS as it is the retention of State lands that allow such activities to occur.

- Pursuant to Section 11-200.1-24(i), "*The draft EIS shall include a description of the environmental setting…Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic significance); specific reference to related actions, public and private, existent or planed in the region shall also be included for purposes of examining the possible overall cumulative impacts of such actions.*"

  In addition, Section 11-200.1-24(l) states that "*The draft EIS shall include an analysis of the probable impact of the proposed action on the environment and impacts of the natural or human environment on the action. This analysis shall include consideration of all phases of the action and consideration of all consequences on the environment, including direct and indirect effects. The interrelationships and cumulative environmental impacts of the proposed action and other related actions shall be discussed in the draft EIS.*"

  Staff notes that Section 3.4, Biological Resources, does not provide enough information regarding the Proposed Action's impact on Special Status species. Specifically, the biological opinions (BOs) issued by the US Fish and Wildlife Service (USFWS) and provided by the Applicant in Appendix K, highlights that activities associated with the Pacific Missile Range Facility (PMRF) result in the incidental take of the following species: 'a'o (Newell's

shearwater), **ʻuaʻu** (Hawaiian petrel), **ʻAkēʻakē** (band-rumped storm petrel), **ʻōpeʻapeʻa** (Hawaiian hoary bat), **nēnē** (Hawaiian goose), **ʻalae ʻula** (Hawaiian moorhen), **ʻalae keʻokeʻo** (Hawaiian coot), koloa maoli (Hawaiian duck), and the **aeʻo** (Hawaiian stilt). Further, re-initiation of formal consultation with the USFWS was required due to higher than anticipated take levels of **ʻaʻo** (refer to the 2018 BO) as well as for the **nēnē**[1], **aeʻo**, **ʻalae keʻokeʻo**, **ʻalae ʻula, koloa maoli**, and **ōpeʻapeʻa (refer to the 2025 BO).**

While the BOs were provided as an appendix, the technical information found in them was not included in the main discussion section on biological resources. Staff highly encourages that the Applicant be as forthright as possible with the information rather than having the reader search through the appendices for information that would be valuable in the main document. Staff also acknowledges that the BOs may extend beyond the scope of the proposed action, even if amended as discussed above, but Staff believes that they provide a good insight to both primary and secondary impacts to species of concern.

Moreso, Staff believes that current take data in relation to the allowable take limits for each species should be included along with a discussion on the **Applicant's current progress** in implementing the required conservation measures as this information would be considered important for the Board to consider during future decision making.

Staff further notes that the discussion on erosion and runoff generated **on Mākaha Ridge** does not take into account the erosion that caused by structures and impervious surfaces **located at the site that exist purely because of PMRF's presence. Rather the Applicant** focuses fault on the presence of ungulates and their grazing on soil stabilizing vegetation. While Staff does not argue that the ungulates play their part, the structures and other impervious surfaces also exacerbate the situation. Staff also notes that the current BMPs and mitigation measures employed by the Navy only focus on addressing the ungulate issue. No consideration has been given to mitigating the impacts from the impervious surfaces. **It should be noted that Mākaha Ridge is located in the Conservation Distric**t and runoff directly enters coastal waters just below. Due to its location and the purpose and objectives of the Conservation District, the Applicant should include a more thorough discussion regarding erosion issues and the continuing impact that the issuance of a new long-term disposition would have both to the land and to the PRMF structures themselves (i.e. undermining of structures that may require new construction, etc.)

Regarding the cumulative analysis in Chapter 4, Table 1-5 provides a list of previous environmental review documents as they related to PMRF. Those projects should also be included in Table 4.1.5 especially if the activities are noted as ongoing. For those projects that are no longer ongoing, any long-term impacts from those activities that could still lingering should also be discussed and included in the analysis. In addition, the cumulative analysis should also include the use of the 12 square mile ocean right-of-way and the testing and training activities that the underwater cables support as they are still part of the overall training and testing mission at PMRF. As currently written, it is unclear if past, current and future projects have/will have impacts to natural and cultural resources and thus would add to the impacts of the proposed action. Statements made in this section appear to be relatively **vague on how the Applicant reached conclusions of "no cumulative effects**

[1] **in the 2025 BO, the nēnē** is no longer to be considered a federally listed endangered species as it **was downlisted to threatened in 2020. However, the nēnē is still a State listed endangered species.**

- Pursuant to Section 11-200.1-24(p), HAR "*The draft EIS shall consider mitigation measures proposed to avoid, minimize, rectify, or reduce impacts, including provision for compensation for losses of cultural, community, historical, archaeological, and fish and wildlife resources, including the acquisition of land, waters, and interests therein. Description of any mitigation measures included in the action plan to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable shall be included...*"

  Staff notes that the archaeological inventory survey (AIS) prepared for PMRF, lacks proposed mitigation as it pertains to compliance with Section 6E-8, HRS. Section 6E-8, HRS requires concurrence on any determination of effect on historic properties from the State Historic Preservation Division (SHPD). In this case, the Applicant identified and evaluated eight sites as being significant. Based on this, Land Division, who would be responsible for ensuring the compliance with HRS Chapter 6E, would most likely propose a determination of **"Effects with agreed upon mitigation"** to SHPD. Therefore, it would appear prudent that proposed mitigation for archeological sites be included for consideration.

  Staff also notes that the vegetation survey prepared for the **Kōke'e Park** Geological Observatory (KPGO) recommended several mitigation measures that were not included in the main document that pertain to the endangered **Kōpiko**.

  Further, as stated in our earlier comment, the Applicant only provides current BMPs and **mitigation measures as they pertain to ungulates and erosion at Mākaha Ridge.** While long-term soil stabilization through the use of native plants is ideal, there is no mitigation proposed to mitigate the immediate impacts that are exacerbated by the presence of structures and impervious surfaces.

  Moreso, Chapter 5 address mitigation and enhanced management measures. Staff had mentioned to the Applicant previously that for the No Action Alternative, it was important to provide, at the bare minimum, best faith efforts that the Applicant would be willing to commit to, regardless of negotiations, regarding the clean-up and/or restoration of the State-lands. Nevertheless, the Applicant left the issue open ended as the decisions are ultimately **dependent on "future negotiations."**

Regardless of the above issues, Staff reviewed majority of the document, including the appendices provided, and offers the following comments regarding specific sections:

1. Regarding the requested duration of any new long-term land disposition(s) from the State, **we note that "long-term" is defined as over 25**-years in table RG-1, however, throughout the main body of the document, this was never established again. Please clarify in the main document what the requested lease and/or easement duration(s) would be.

2. In Section 1.1, Staff requests that the Navy povide a more robust discussion regarding their decision to no longer pursue an easement for the 12 square miles of ocean right-of-way and to include better explanation of the Submerged Lands Act and its relation to the doctrine of Navigational Servitude, the U.S. Constitution, and the Admissions Act.

3. In Section 1.3.1 please clarify when **Mānā well** was constructed and by whom.

4. In Section 2.3.1 and 3.1.4.2.1, please clarify the scenario in which Alternative 1 was analyzed. While we recognize that long-term was defined as over 25-years, it is unclear the length of time the potential impacts were analyzed under this particular scenario.

5. In Table 2-7, on page 2-37, please clarify when the last survey was done to assess the presence/absence of endangered Hawaiian picture-wing fly species at and directly adjacent to KPGO and who does the surveys (i.e. an entomologist vs a biologist).

6. Given our comments above regarding the scope of the proposed action, Staff disagrees with the Region of Influence (ROI) as defined in Section 3.1.3 with the exception to cultural practices and socioeconomics in which the Applicant identified that the geographic extent of the affected environment is larger.

7. In Table 3.1-4, please clarify if the previous environmental review documents were NEPA and/or HEPA documents.

8. In Table 3.1-4, under the 1993 PMRF Restrictive Easements EIS on page 3-13, it mentions the use of the southern end of Polihale State Park and that people within the easement are notified three hours prior to launch. Please clarify the need for such a short notification period compared to the extensive coordination PMRF does when they notify the public of other closures due to launch activities.

9. Throughout Section 3.2, Archaeological and Architectural Resources, Staff notes that the Applicant states that certain identified sites have been "determined" to not be NRHP-eligible of HRS Chapter 6E significant and other times they state that sites were not "recommended" as eligible. While the State has no say in the NRHP eligibility, SHPD would need to concur with the determination of significance. Therefore, we ask that the Applicant clarify what sites were reviewed by SHPD and a determination issued.

   Further, regarding the ammunition magazines at Kamokalā, the Applicant stated that adverse effects to these types of property have been mitigated and therefore they are no longer managed or treated as NRHP-eligible under NHPA or HRS Chapter 6E. We request the Applicant clarify if the sites were ever assessed under HRS Chapter 6E prior to mitigation and if SHPD concurred with the sites no longer being significant under HRS 6E.

10. Staff requests that the Applicant provide both a map and language in applicable sections that areas that were not surveyed as a part of the AIS coincides with the leases under the jurisdiction of the Agribusiness Development Corporation.

11. In Section 3.2.1.2, please include a discussion on the Navy's current compliance with Section 6E-8, HRS regarding archaeological and historic properties.

12. Section 3.4.1.1.4.2, Special Status Plants, fails to include relevant information from the vegetation survey prepared for the KPGO site, especially regarding the Kōpiko. The current health and number of plants located at the site should have been provided for the reader to better understand the importance of the presence of these plants.

    Also, this same section mentions the presence of Alaka'i Swamp pritchardia or loulu at the site. However, no mention of this plant is included in the vegetation survey prepared for the KPGO site.

13. In Section 3.4.2.2, we note that the Applicant has stated that they will continue to comply with HRS Chapter 195D by obtaining a number of permits and licenses but caveats the statement with "as needed." It is unclear who, in this case, makes the determination regarding what permits and licenses are "needed" as the Board would most likely prefer that the Applicant comply with all applicable State laws and apply for all permits and licenses needed for such compliance. Therefore, for clarity purposes, we request that the Applicant determine which permits and licenses they will be applying for and include those in Table 6-2.

14. In Section 3.5, Land Use, the discussion surrounding Alternative 2 and potential impacts does not explore the impacts of the SLUD and zoning regulations no longer being required, especially the protective measures that are ensured for those lands within the Conservation District.

15. In Section 3.6.2.2.1, we are unclear what the Applicant means when they state that "*The value associated with payments resulting from succeeding real estate agreements and how they are distributed to the County of Kaua'i would be determined following negotiations between the U.S. Government and DLNR.*" We ask that the Applicant provide an explanation why they believe that a portion of the payments received from any new real estate agreements would be directly distributed to the County.

16. Section 3.7 should include a discussion on impacts to nearshore waters regardless of an expanded Proposed Action scope. Given the location of the project area to the shoreline, issues such as drainage and runoff should be discussed in terms of impacts to coastal waters.

17. In Section 3.8, Utilities, we note the use of cesspools both at Mākaha Ridge and at KPGO. The Applicant should be aware that the passage of Act 127 in 2017 requires the replacement of ALL cesspools by 2050. All new land dispositions issued by the Department now include a condition that requires the leasees to either convert over to an individual wastewater system or connect to the existing County system.

18. Staff requests a standalone section be added to address impacts to recreation and tourism. The closures of access points and shoreline areas as well as coastal waters and airspace due to training and testing activities should be included for disclosure purposes. Staff recognizes that the Applicant touches on these subjects throughout the document (with the exception to tourism activities which may also be considered recreational i.e. Napali coast tours, helicopter tours, etc. if they exist) however, it is hard to get an overall sense of how much the recreational community on Kaua'i is impacted by the closures. The information complied in one section would help to paint a better picture of the overall situation.

19. In the overall discussion on the impacts/effects of the "No Action Alternative," and as summarized in Table ES-1 and Table 13.4-1) the potential effects seem to heavily lean toward adverse effects due to assumptions made by the Applicant. As there is always two side to every coin, we ask that the Applicant look at the other end of the spectrum when it comes to their assumptions and recognize that the severity of the impacts/effects of the no action alternative could range dependent on decisions made.

20. Staff is unclear why No. 4, PMRF Land-Based Training and Testing, in Table 4.1.5 is considered only as a "future" project. Staff notes that if what is being proposed in the forthcoming environmental assessment are new activities and those testing and training

activities are supported/facilitated through the use of the State lands, those activities should have and if not, will need to be included and analyzed within this document.

21. Staff notes that the premise of Section 5.1 alludes only to new real estate agreements and not to the continued use of the lands and the training and testing activities that the lands support.

22. Staff believes that the discussion in Section 6.2, Unresolved Issues, could be expanded to include the duration for any new long-term land dispositions as well as the conditions imposed/negotiated from any new land disposition issued.

23. In Section 6.3, Unavoidable Adverse Effects, should include a discussion of the loss of public trust lands regardless of the method of retention.

Should you have any questions or concerns regarding our comments, please contact Lauren Yasaka of our Division at 808-587-0431 or at lauren.e.yasaka@hawaii.gov.

DEIS Comment Letter 0109

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

DAWN N.S. CHANG
CHAIRPERSON

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STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES | KA 'OIHANA KUMUWAIWAI 'ĀINA
COMMISSION ON WATER RESOURCE MANAGEMENT | KE KAHUWAI PONO
P.O. BOX 621
HONOLULU, HAWAII 96809

July 23, 2025

REF: RFD.6465.2

TO: David Reth, Director, Management Operations Captain
Goddard Space Flight Center, National Aeronautics and Space Administration

FROM: Ciara W.K. Kahahane, Deputy Director
Commission on Water Resource Management

SUBJECT: Navy Pacific Missile Range Facility & NASA Kokee Park Geophysical Observatory Real Estate

FILE NO.: RFD.6465.2
TMK NO.: Various numbers

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at http://dlnr.hawaii.gov/cwrm.

Our comments related to water resources are as follows:

While the Commission recognizes that the Department of Health (DOH) is the regulatory authority for water quality, water quality affects the water quantity available. As stewards of Hawai'i's precious wai, the Commission on Water Resource Management has concerns over military uses and the potential for groundwater degradation, and thus the potential for reducing the availability of water for potable use.

Historically, there have been instances of military use impacting groundwater. Most notable is the Red Hill Fuel Tank leaks, which have impaired the sole-source aquifer and caused the Honolulu Board of Water Supply to shift their pumpage out to other areas. Additionally, Army training facilities in Waiawa resulted in findings of groundwater contamination in adjacent areas, possibly due to the infiltration of Aqueous-Film-Forming-Foam (AFFF) used for fire fighting training.

For these reasons, a better understanding of all of the potential sources of contamination, which may even include oil leaks from vehicles or residual unexploded ordinances, would help to inform the regulatory agencies about best management practices to employ to ensure that groundwater protection is optimized.

If you have any questions, please contact Ryan Imata of the Groundwater Regulation Branch at (808) 587-0225 or Katie Roth of the Planning Branch (808) 587-0216.

DEIS Comment Letter 0109

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA
SYLAKUKE
LIEUTENANT GOVERNOR | KAHOPE KIA'ĀINA

STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
DEPARTMENT OF LAND AND NATURAL RESOURCES DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

Date: **7/22/25**
DAR # **AR6910**

DAWN N.S. CHANG
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

RYAN K.P. KANAKA'OLE
FIRST DEPUTY

GIARA W.K. KAHAHANE
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

MEMORANDUM

TO: Brian J. Neilson
DAR Administrator

FROM: **Heather Yl ital o-Wad**, Aquatic Biologist

SUBJECT: **The Pacific Missile Range Facility (PMRF) and Nasa Kokee Park Geophysical Observatory (KPGO) Real Estate Draft EIS**

Request Submitted by: **Land Division**

Location of Project: **Tax Map Key(s) (TMK(s)) (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.)**

Brief Description of Project:

The Navy proposes to retain the use of 8,172 acres of state lands on Kaua'i, Hawai'i, for operational continuity and sustainment, in support of continued military training, testing, and facility operations at the Pacific Missile Range Facility (PMRF). The National Aeronautics and Space Administration (NASA) proposes to retain the use of 23 acres of state lands on Kaua'i, Hawai'i, in support of continued operations including measurements of the Earth's rotation and local land motion at Kōke'e Park Geophysical Observatory (KPGO).e

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: **07/25/2025**

Brian J. Neilson
DAR Administrator

DAR# AR6910

Comments

The Division of Aquatic Resources Kaua'i Nui District appreciates the opportunity to submit these comments on the The Pacific Missile Range Facility (PMRF) and Nasa Kokee Park Geophysical Observatory (KPGO) Real Estate Draft Environmental Impact Statement.

The Hawai'i State Department of Land and Natural Resources (DLNR) Division of Aquatic Resources (DAR) manages the state's aquatic resources and ecosystems through programs in ecosystem management, place-based management, and fisheries management. Major program areas include projects to:

- protect and restore the aquatic environment;
- protect threatened and endangered aquatic species and their habitat;
- conserve and restore endemic and indigenous aquatic species and their habitat;
- combat the introduction of invasive species and reduce their impact on ecosystems;
- effectively manage fisheries; and
- carry out education and outreach to the public.

The main aquatic resources of concern in direct contact with the lease area of PMRF would be protected species, including Hawaiian monk seals and green sea turtles that frequent the beach adjacent to the base. The Division of Aquatic Resources maintains a good relationships with the staff at PMRF. The staff's best management practices (BMPs) for sea turtles and monk seals continue to to be sufficient to prevent take of these protected species.

KPGO proposes to follow BMPs to reduce storm water runoff and minimize impacts to any freshwater resources in the near area.

In regards to these land leases, the Division of Aquatic Resources requests that these BMPs continue to be followed to minimize impacts to aquatic resources.

DAR continues to be concerned with the proposed Pacific Missile Range Facility Land-Based Training and Testing activities submitted in 2024 in a Draft Environmental Assessment (EA). Other than green sea turtles basking or nesting and Hawaiian monk seals hauled out in or near activity zones, the draft EA does not adequately address the impact of proposed activities to aquatic resources, including habitats or species in nearshore and pelagic environments adjacent to activity zones. The claim that "any effects in or over the water associated with land-based training and testing activities… have been previously analyzed in prior related NEPA

DAR# AR6910

Comments

documents" (page 1-3) is insufficient. The proposed increase in frequency of these activities warrants a reanalysis of potential impacts.

Prior to any proposed activities, the DAR suggests extensive monitoring of the aquatic resources to establish a baseline understanding of possible impacts to the area. Additionally, continual monitoring should occur after any proposed activities to determine the effect on aquatic resources.

The impact of leaving spent inert munitions in the environment adjacent to Ka'ula has not been addressed and no measures to remove or clean up the ordnance from the region of impact and surrounding areas have been detailed. It is likely that much of this ordnance will accumulate with previous munitions and unexploded ordnance in the nearshore waters adjacent to the region of impact, contributing to the larger impact of marine debris accumulation at Ka'ula.

DEIS Comment Letter 0109

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STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

July 25, 2025

MEMORANDUM

TO: Ian Hirokawa
Acting Administrator, Land Division

FROM: David G. Smith DGS
Administrator, Division of Forestry and Wildlife

SUBJECT: Review of Draft Environmental Impact Statement for Pacific Missile Range **Facility and Kōke'e Park Geophysical Observatory Real Estate** at State **Lands adjacent to the Pacific Missile Range Facility and Kōke'e Park** Geophysical Observatory Located on the Island of **Kaua'i, Hawai'i**

The Division of Forestry and Wildlife ("DOFAW") received Land Division staff's request to review the Draft Environmental Impact Statement for Pacific Missile Range Facility and **Kōke'e** Park Geophysical Observatory Real Estate at State Lands adjacent to the Pacific **Missile Range Facility and Kōke'e Park Geophysical Observatory Located on the Island of Kaua'i, Hawai'i ("PMRF and KPGO DEIS") at tax map keys ("TMKs")** (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), and (4) 1-4-001:014 (por.) dated June 2025. The purpose of the PMRF and KPGO DEIS is tot discuss the environmental impacts from the Navy retaining use of 8,172 acres of statet lands (684 acres of leaseholds; 7,488 acres of easement lands) in support of ongoingt military training, testing, and facility operations at PMRF; and National Aeronautics andt **Space Administration ("NASA") retaining 23 acres of state lands (16 acres of leaseholds;***e* seven acres of easement lands) in support of maintaining data collection efforts of globalt significance at KPGO. The current real estate agreements are set to expire betweent 2027 and 2030. The duration of the real estate agreements will be negotiated if thet PMRF and KPGO FEIS are approved by the Board of Land and Natural Resourcest **("Board")**.*e*

DOFAW staff reviewed the PMRF and KPGO DEIS in conjunction with associated documents, utilizing their subject matter expertise, and provided comments on whether the PMRF and KPGO DEIS represent an informational instrument that fulfills the intent and provisions of Chapter 343, HRS, and adequately discloses and describes all

identifiable environmental impacts. DOFAW identifies issues in the PMRF and KPGO DEIS grouped by administrative rules from Chapter 11-200.1, Hawaii Administrative Rules **("HAR")**, that warrant further explanation.

DOFAW reviewed the PMRF and KPGO DEIS in conjunction with biological opinions included in volume 4 of the DEIS and the final draft of the **"Integrated Natural Resource** Management Plan Pacific Missile Range Facility Islands of **Kaua'i**, Ka'ula, and Ni'ihau State of Hawai'i**" dated** December 2023 **("INRMP") because these documents were** reference documents for natural resource management actions in the PMRF and KPGO DEIS.

I. Proposed Action and Alternatives

HAR §11-200.1-**24(d)(1) states, "***The draft EIS shall contain a summary that concisely discusses the following: (1) Brief description of the action;* ***[and]****... (4) Alternatives considered..."*

HAR §11-200.1-**24(h) states, "***The draft EIS shall describe in a separate and distinct section discussion of the alternatives of no action as well as reasonable alternatives that could attain the objectives of the action. This section shall include a rigorous exploration and objective evaluation of the environmental impacts of all such alternative actions. Particular attention shall be given to alternatives that might enhance environmental quality or avoid, reduce, or minimize some or all other adverse environmental effects,* ***costs, and risks of the action."***

The Proposed Action explains that the Navy and NASA want to retain use of state lands described in the PMRF and KPGO DEIS, and three alternatives explain how the Navy and NASA would retain such lands. DOFAW prefers that Navy and NASA include the preferred method of retention in the explanation of the Proposed Action to make it easier for the reader to understand the Proposed Action in its entirety.

Of the three alternatives, DOFAW prefers Alternative 1 and the No Action Alternative. In Alternative 1, the Navy and NASA would renew the lease and easement agreements. In the No Action Alternative, the Navy and NASA would not renew the lease and easement agreements. These alternatives are preferred because the State would continue to hold fee title to the affected parcels.

DOFAW does not support Alternative 2, which involves conveying the leased land to the federal government in fee simple. Conveying the leased land would result in a permanent loss of public access and community use of these lands. It would also diminish Department oversight and weaken the ability to ensure proper environmental stewardship and long-term resource management over these lands. The PMRF and KPGO DEIS does not provide sufficient information for the Board to determine that public access and enforcement of state law would occur if these lands were conveyed to the federal government.

II. Permits and Approvals from the Division of Forestry and Wildlife

HAR §11-200.1-**24(d)(6) states, "***The draft EIS shall contain a summary that concisely discusses the following: **...(6) Compatibility with land use plans and policies, and a list of permits or approvals..."***

DOFAW**'s** support for Alternative 1 is contingent upon the Navy and NASA implementing recommendations from the Department on the responsible management of the lease and easement lands. Leases and easements should include a dedicated fee to support stewardship of natural resources in the surrounding areas, and a market-based fee schedule should be applied to communications and utility sites. DOFAW requests to preserve the ability to regulate public access to adjacent DOFAW-managed lands through easement and leased lands, enforce relevant laws, and coordinate with federal partners to address invasive species threats and monitor special-status species on the easement and leased lands.

Navy should address the following permit and access issues related to hunting opportunities and ungulate control in the PMRF and KPGO DEIS:

1. DOFAW requests that the Navy and NASA continue to control ungulates within the lease and easement lands, utilizing public hunters, if possible. Ungulate control is crucial for enhancing the survival of native species in these areas.
2. Section 3.5.1.5.2 states that, "**[h]**unting is allowed on portions of the restrictive use easement at Main Base." DOFAW requests that more information on how the public can participate in the hunting program on Main Base be presented in the PMRF and KPGO DEIS.
3. Agribusiness Development Corporation and the Navy are both entitled to certain uses of the land within Easement 106. Currently, public access is allowed across Kiko Road to access the Kekaha Game Management Area through the Mana Tunnels hunter check-in station. DOFAW requests that public access through the Mana Tunnels hunter check-in station on Kiko Road be continued. A discussion of public hunter access through the easement area to Kekaha Game Management Area should be included in Section 3.5.1.5.2.
4. Future real estate documents should provide alternative access for the public to enter the Kekaha Game Management Area, should Easement 106 need to be closed by the Navy.

Navy and NASA should ensure the following issues concerning DOFAW permitting and agreements are followed in future actions:

1. The Sikes Act requires most military installations within the United States to develop and implement a comprehensive natural resource conservation and management plan, known as an Integrated Natural Resource Management Plan **("INRMP"). The PMRF and KPGO DEIS should** provide a clearer description of the entities involved in developing the INRMP, including when the current INRMP expires and when a new INRMP would be developed under new real estate agreements. The INRMP should include provisions to periodically evaluate the effectiveness of best management practices and EMMs, including timelines and adaptive management provisions, if goals are not met. The PMRF and KPGO DEIS should briefly describe these periodic evaluations.
    a. DOFAW requests that Navy and NASA:

i. Coordinate with DOFAW when developing, implementing, and evaluating actions in the INRMP. The INRMP needs clear and measurable goals.
ii. **Share these data with DOFAW Kaua'i Branch staff and other** agency partners staff annually or biannually.
iii. Add management and mitigation of listed plant species missing from the INRMP, such as *Psychotria grandiflora*.

b. The lease and easement should contain terms that bind the Navy and NASA to benchmarks for the protection of natural resources.

2. **DOFAW Kaua'i Branch** should be consulted if any actions are planned within a forest reserve that may trigger the need for a Special Use Permit, Access, or Collections permit.

III. Discussion of Impacts to Native and Listed Species on All Leased Lands

HAR §11-200.1-**24(a) states, "***The draft EIS, at a minimum, shall contain the information required in this section. The contents shall fully declare the environmental implications of the proposed action and shall discuss all reasonably foreseeable consequences of the action. In order that the public can be fully informed and that the accepting authority can make a sound decision based on the full range of responsible opinion on environmental effects, an EIS shall include responsible opposing views, if any, on significant environmental issues raised by the proposal."*

HAR §11-200.1-**24(i) states, "***The draft EIS shall include a description of the environmental setting, including a description of the environment in the vicinity of the action, as it exists before commencement of the action, from both a local and regional perspective. Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human-made resources of historic, cultural, archaeological, or aesthetic significance); specific reference to related actions, public and private, existent or planned in the region also be included for purposes of examining the possible overall cumulative impacts of such actions..."*

HAR §11-200.1-**24(p) states, "***The draft EIS shall consider mitigation measures proposed to avoid, minimize, rectify, or reduce impacts, including provision for compensation for losses of cultural, community, historical, archaeological, and fish and wildlife resources, including the acquisition of land, waters, and interests therein. Description of any mitigation measures, including in the action plan to reduce significant, unavoidable, adverse impacts to insignificant levels, and the basis for considering these levels acceptable shall be included..."*

A. Best Management Practices

The Enhanced Management Measures ("EMMs") summarized in Section ES.5 of the Executive Summary, Table 3.14-1 Summary of Potential Environmental Effects, and Table 5.2-1 PMRF and KPGO Proposed Enhanced Management Measures, are not descriptive enough to show alignment with laws and policies governing Department actions to allow the Board to make a sound decision on the full range of environmental impacts. The PMRF and KPGO DEIS should provide a summary of site-specific

conservation goals for each leased area, rather than just general best management practices and EMMs. The Navy and NASA should more clearly outline how they will jointly or separately manage their respective land management responsibilities, particularly where overlapping infrastructure and conservation areas exist.

The Navy should further discuss the following issues concerning wildland fire management:

1. The Navy should include its plan for removing deadfall (woody debris) in Section 3.3.1.3 to reduce wildfire risk.
2. The Navy could improve and increase the availability of water resources within PMRF and on the easement and leased lands. Perform upgrades to water infrastructure in a timely manner.
3. Ensure clearance for above-ground utility lines to minimize the chances of wildfire. Include flora and fauna surveys prior to clearing vegetation to ensure no significant resources will be put at risk by the action.
4. **Mākaha Ridge is a high**-hazard area with very few wildland fire management capabilities. The Navy should have a fire response plan and a rapid response capability for this area.
5. Develop and share emergency mitigation plans for leased lands with permanent **Department of Defense staff and DOFAW Kaua'i Branch staff**.

The Navy and NASA should further discuss the following issues concerning invasive species control:

1. Describe the programs in place to reduce the introduction of invasive species. The Navy should describe and ensure the implementation of sanitation protocols for all vehicles, equipment, and tools moving between sites to minimize the spread of invasive species. This includes implementing best management practices for minimizing introductions by government personnel, contractors, and residents.
2. Consult with DOFAW on generating a list of incipient weeds that should be targeted by PMRF staff for eradication on leased lands. Update this list annually.
3. Add more information from the INRMP to Section 4.1.3 to capture the scope, history, specific priority species, and interagency coordination for general nuisance and invasive animal management. Include a comprehensive list of invasive species from the INRMP, a description of early detection methods and rapid response coordination, and the roles of agency partners working on this issue. Add the success of USDA Wildlife Services and DOFAW from 2006 to present to show institutional continuity and accountability in addressing invasive species issues.
4. **NASA should contract Kōke'e Resource Conservation Program ("KRCP") to** coordinate weed control of *Ligustrum sinsense*, *Coccinia grandis*, and *Pyracantha angustifolia*. NASA should include a plan for controlling these species at KPGO.

The Navy and NASA should further discuss the following issues related to plant management:

1. The Navy should incorporate xeriscaping and reduce impermeable surfaces within the infrastructure footprint.

2. Collaborate with DOFAW on native plant restoration projects on leased lands.

Navy and NASA should further discuss the following terrestrial invertebrate and pollinator management issues:

1. Integrate invertebrate survey results into mitigation planning and include how findings inform landscaping, pest control, and habitat design.
2. Discuss commitment to avoid using harmful insecticides (e.g., Neonicotinoids) to be consistent with INRMP best management practices.
3. Provide explicit protections or management objectives for at-risk pollinators and native arthropods.
4. Ensure surveys of Hawaiian picture-wing flies are conducted in collaboration with DOFAW and copy DOFAW on survey reports.

In addition to the categories above, the Navy and NASA should identify how they will fund and prioritize cultural and natural resource management objectives, including establishing dedicated funding sources to support these objectives.

The Navy should further discuss the impacts of rocket launches on the surrounding environment and their contribution to global climate change.

Navy should include a discussion of runoff control for current structures in Section 3.3.1.1. The Navy should not only be concerned with pesticide use but also with the sediment and particulates that contain pesticides. The types of soils listed in the PMRF and KPGO DEIS absorb chemicals and could pose a significant downstream risk, especially during storm events.

B. Listed Species Interactions and Potential Take

Under federal law, federal agencies and **the U.S. Fish and Wildlife Service ("USFWS")** are required to consult with DOFAW; however, Department approval is not necessary **for Section 7 consultations under the federal Endangered Species Act ("ESA").** Therefore, the draft components of biological opinions and biological assessments are **not always readily available for DOFAW's comment.** Some species listed as endangered or threatened under the federal Endangered Species Act are also listed under state law. There are also species listed as threatened or endangered only under state law. An analysis of the impact standard,[1] authorized take, and minimization and mitigation actions for federally listed plants and animals, as reviewed in biological **opinions, is essential to DOFAW's evaluation of local and cumulative environmental** impacts on each listed species and its habitats.

The USFWS issued non-jeopardy biological opinions in 2014, 2018, and 2025 for species located on lease and easement lands, including PMRF and KPGO. The 2018 Biological Opinion and 2025 Biological Opinion authorized take of the following species. The authorized take for ʻaʻo is for fifty years and the authorized take for all other species listed is ten years:

[1] The impact standard refers to the determination by the USFWS on the federal agency actions impacts to federally listed species under Section 7 of the ESA.

1. ‘A‘o or **Newell’s shearwater** (*Puffinus newelli*)
    a. Take from lighting – seven fledglings per year, 63 birds in 50 years,
    b. Take from communication towers – 50 adults and subadults per year, 450 birds in 50 years: 7 eggs/chicks per year, 63 eggs/chicks in 50 years.
2. **Nēnē or Hawaiian goose** (*Branta sandvicensis*)
    a. Take from aircraft strikes, up to four individuals per year.
    b. Take due to nest destruction, up to three individuals per year and a maximum of seven nests in one year.
    c. Take due to nest abandonment from disturbance with rocket launching activities, up to one nest per year.
    d. Take due to nest destruction from rocket launching activities, up to one nest per year.
    e. Take due to abandonment of the Oxidation Pond re-lining project, up to one nest.
    f. Take due to vehicle strikes, up to ten individuals per year and a maximum of fifteen individuals in one year.
3. Ae‘o or Hawaiian Stilt (*Himantopus mexicanus knudseni*)
    a. Take due to aircraft strikes, up to one individual per year.
    b. Take due to vehicle strikes, up to one individual per year.
4. ‘Alae ‘ula or Hawaiian gallinule (*Gallinula galeata sandvicensis)*
    a. Take due to aircraft strikes, up to one individual per year.
    b. Take due to vehicle strikes, up to five individuals per year.
    c. Take due to incidental capture from predator control, up to three individuals per year.
5. ‘Alae ke‘oke‘o or Hawaiian coot (*Fulica alai)*
    a. Take due to aircraft strikes, up to one individual per year.
    b. Take due to vehicle strikes, up to two individuals per year.
    c. Take due to abandonment of the Oxidation Pond re-lining project, up to one nest.
6. Koloa maoli or Hawaiian duck (*Anas wyvilliana)*
    a. Take due to aircraft strikes, up to one individual per year.
    b. Take due to vehicle strikes, up to three individuals per year.
    c. Take due to abandonment from the Oxidation Pond re-lining project, up to one nest.
    d. Take due to incidental capture from predator control, up to three individuals per year.
7. ‘Ōpe‘ape‘a or Hawaiian hoary bat (*Lasiurus semotus)*
    a. Take due to emergency tree trimming, up to two adults and four pups.
    b. Take due to entanglement with barbed wire, up to four individuals.

Navy and NASA should include discussions on the following listed species and mitigation issues in the PMRF and KPGO DEIS:

1. Include a tracking matrix showing the status of each species and the management commitment (e.g., **Nēnē hazing frequency, seabird fallout recovery** protocols, seabird nest surveys, etc.).
2. Discuss how the Navy and NASA plan to coordinate with DOFAW on data sharing, co-monitoring, and contingency responses (e.g., **Nēnē chick banding,** species mortality events, etc.).

3. PMRF and KPGO DEIS should be updated to describe the authorized take by species in federal biological opinions and associated minimization and mitigation for authorized take, and the status of the take limits and whether mitigation goals have been met. Discuss adaptive management triggered by increased take.
4. Species-specific recommendations:
    a. Discuss results from seabird fallout monitoring, scavenger trials, and tower collision studies.
    b. Clarify whether barbed wire removal or retrofitting has been implemented on the infrastructure.
    c. Discuss a timeline and funding commitment for testing and implementing bat deterrent measures.
    d. Avoid clearing vegetation taller than 15 feet during bat pupping season (June 15 to September 15) to avoid disturbing bat pups.
    e. Discuss **nēnē hazing methods, seasonal timing, and decision**-making criteria to ensure effective hazing without displacing breeding pairs or families.
    f. Discuss vehicle collision mitigation strategies **for nēnē**, including existing speed control measures, signage, and driver training.
    g. Discuss site-specific locations for waterbird hazing and monitoring, and summarize the long-term monitoring outcomes. Incorporate non-lethal habitat design adjustments to deter waterbird attraction near airfields.
    h. Volume 4 contains the Final Vegetation Survey Report at PMRF. Table 4-1 and Figure 4-1 show the exact locations of endangered plants. DOFAW requests that this information be redacted from the PMRF and KPGO DEIS due to the risk of theft or vandalism to the species.
    i. Off-roading in Polihale State Park and adjacent Nohili Dunes should be **prohibited as it is within the critical habitat of the endangered plant Ni'ihau** Panicgrass (*Panicum niihauense*). The last and only known area to contain these plants in the wild.
    j. Navy should discuss management, restoration, and mitigation of *P. niihauensis* in the PMRF and KPGO DEIS.
    k. Volume 4 contains the KPGO Floral Survey Report. Page 17 shows locations of *Psychotria grandiflora.* DOFAW requests that this information be redacted from the PMRF and KPGO DEIS due to the risk of theft or vandalism to the species.

We appreciate the opportunity to comment and hope that the concerns raised above will be considered during the Board**'s** decision process and in any subsequent real estate transaction. If you have any questions regarding these comments, please contact Sheri Mann, DOFAW **Kaua'i** Branch Manager, at Sheri.S.Mann@hawaii.gov or 808-274-3436.

DEIS Comment Letter 0109

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STATE OF HAWAI'I
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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

REF:OCCL:TM

Correspondence: KA 25-220

MEMORANDUM

August 1, 2025

TO: Chairperson Dawn N.S. Chang

FROM: K. Tiger Mills, Staff Planner
Office of Conservation and Coastal Lands

SUBJECT: Comments on the U.S. Navy Pacific Missile Range Facility (PMRF) and NASA **Kōke'e Park Geo**physical Observatory (KPGO) Real Estate Draft Environmental Impact Statement (EIS) Located at **Kekaha** and Na Pali Kona and **Pu'u Ka Pele** Forest Reserves, Waimea, **Island of Kaua'i**
Tax Map Key(s): (4) 1-2-002:001, 024, 025, 026; and (4) 1-2-001: 001, 006, 010; (4) 1-4-001:002, 013, 014

The Office of Conservation and Coastal Lands has reviewed the subject EIS in relation to the State leased parcels or portions of the subject parcels noted above that lie within the Conservation District. **Submerged land makai of the shoreline** also lies within the Conservation District.

The OCCL notes the NASA [National Aeronautics and Space Administration] lease for the Geophysical Observatory is a separate lease that is not part of the $1 military lease agreement.

The OCCL suggests a**hupua'a be described as a** *land division usually extending from the uplands to the sea,* rather than a subdivision.

The OCCL suggests Tax Map Keys be utilized in the document to aid the reader in determining the location of the focus area.

The Draft EIS states: "*No ground-based training occurs on these leasehold and easement lands*". "*95% of easements are passively used for encroachment buffers and mission readiness and the remaining 5% are used for access and utilities.*"

PMRF
The existing uses within the Conservation District include antenna and related structures, **missile tracking and surveillance facilities, undeveloped land used for safety zone buffers,** drainage management, roadways and access to utilities. This would include:

- **Track E**-1: A portion of Nohili Dune, SIHP Site No 50-30-05-1860, access, ordnance related facilities, missile assembly building, maintenance and storage, and lands for **setback**
- **Track E**-2: Telecommunications, access, **operations and lands for setback**
- GHA Easement 1 & 2: Ground Hazard Area for missile launches
- Lease Parcel A & B-**Makaha:** Secured entrance, access, data & telecommunications **buildings & facilities, water & fuel tanks,** power plant, helicopter landing pad, observation range;
- Easement Parcel D & E Roadways
- Lease Boresight Tower: telecommunications
- **Lease Miloli'i Ridge Reflectors 1**-3: telecommunications

Section 3.5.1.6.1 Main Base states, "*All current uses of leasehold and easement lands at Main Base are either lawful uses established before October 1964 or conducted with authorizations received from the Office of Conservation and Coastal Lands.*" Our records indicate permits for telecommunication improvements **that appear to straddle the USA fee parcel and Track** E-2; the radar facilities at **Miloli'i** ridge within the **Pu'u Ka Pele F**orest Reserve and minor authorizations for a weather camera, native plant restoration, vehicle barrier and a canopy for **a guard station at Makaha Ridge**.

We have no other records of authorizations for improvements within the Conservation District for other current land uses on leasehold or easement lands. Apart from the above-mentioned authorizations and this draft EIS, the OCCL has no record of other facilities, utilities, or other land uses on State leased land and easements that lie within the Conservation District. The above statement needs to be modified as several land uses were implemented after 1964 that the Department did not review regarding the Conservation District.

In reviewing Conservation District Use Permit (CDUP) KA-1024 for the Radar Related Facilities **located upon Miloli'i Ridge, according to the staff submittal to the Board of Land and Natural** Resources, the Division of Land Management was concerned about the *"further sprawl of military activities." "Documents filed with the Division of Land Management confirm the leasing of 248 acres of land to the U.S. Navy located primarily on Makaha Ridge, Moreover, the applicant was requested, by letter dated March 15, 1978, to furnish sets of master plans showing existing development, future development, and because of substantial volume of water used from* ***the Koke'e water system, present and future water requirements."*** No response to this request was found in CDUP KA-1024.

The OCCL requests no ordinance and no material or facilities that may have the potential to damage, degrade or cause harm to land and the natural resources be stored on Conservation District land. No operations that may be hazardous to the land and resources such as launching missiles should be sited on Conservation District lands. The Conservation District is for the purpose of conserving, protecting, and preserving the important natural and cultural resources of the State through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare.

The Draft EIS describes PMRF as a Test and Evaluation (T&E) environment. "*The Navy conducts missile systems tests and has supporting facilities to track and evaluate these tests*

from the ocean floor to the outer atmosphere." In addition, "*The Navy, Air Force, Army, Marine Corps, allied foreign forces' RD* [Research Development] *T&E programs, and non-DoD agencies (including NASA and commercial entities), all utilize PMRF's unique capabilities.*" The EIS further describes the unique location of broad ocean areas in every direction that "*safely and effectively supports these operations*."

But then the EIS states that the ocean right of way is not part of the area analyzed in this EIS and RDT&E activities will not change. In the final EIS, it needs to be clarified why there is no evaluation or proposed mitigation for potential effects of Research Development Test and Evaluation on the ocean resource. Could RDT&E activities contaminate ocean resources? Is the ocean "closed" during launch operations?

Further it is unclear what currently exists in the ocean. Past experiences with material placed in the ocean such as pipes, cables, anchoring systems that have become untethered proved to be detrimental to coral colonies and may cause harm to ocean marine life that may become entangled. The final EIS should contain information about what was placed in the ocean, the condition and status [useful life] of what was placed, mitigation or decommissioning to protect the ocean resources.

The final EIS should discuss the right of transit along shorelines pursuant to HRS Chapter 115. Obstruction of lateral shoreline access shall be avoided or minimized. If obstruction is unavoidable, an alternative lateral access shall be provided unless there is a clearly stated public safety concern.

The draft notes "*The affected environment is considered the baseline environment without the Proposed Action*." The final EIS should discuss the effects of the existing facilities on the leased lands. For example, by reviewing different views of Miloli'i Ridge and Makaha Ridge, the development of these facilities, its gradual decline and subsidence may be contributing to erosion of the ridges and red dirt run-off in addition to the ungulates. Studies of the existing facilities on State leased lands, the status and useful life of facilities including roads, erosion control, utility corridors and roposed decommissioning or contemplated retention of land uses should be included in the final EIS.

At the end of the lease, existing land uses located at PMRF may be considered non-conforming uses and structures. Pursuant to the Hawai'i Administrative Rules (HAR) §13-5-7 the rules and regulations of the Conservation District shall not prohibit the continuance, or repair and maintenance, of nonconforming land uses and structures as defined in HAR Chapter 13-5.

- The repair of structures shall be subject to development standards set forth in this chapter, and other requirements as applicable, including but not limited to a county building permit, shoreline setback, and shoreline certification.
- If a nonconforming structure is damaged or destroyed by any means (including voluntary demolition) to an extent of more than fifty per cent of its replacement cost at the time of destruction, it shall not be reconstructed except in conformity with the provisions of this chapter, except as provided under section 13-5-22(P...

- Repairs or maintenance of a nonconforming structure shall not exceed the size, height, or density of the structure which existed on October 1, 1964, or at the time of its inclusion into the conservation district.
- The burden of proof to establish that the land use or structure is legally nonconforming shall be on the applicant.

At the termination of the existing lease, all proposed new land uses on State land shall comply with HAR Chapter 13-5.

KPGO
The entire area noted as Lease Parcel A, B, C, D, E & F and Easement right-of ways within the Forest Reserves lies within the Conservation District. The site appears to be utilized for data collection.

In reviewing State General Lease No. S-3917 dated 8/16/65, the OCCL notes the following statements in the lease:

> THE LESSOR AND THE GOVERNMENT IN CONSIDERATION OF THE PREMISES, COVENANT AND AGREE AS FOLLOWS:
>
> **6. The Government shall have the right, during the existence of this lease, to make** alterations, attach fixtures, an erect additions, structures or signs in or upon the premises hereby leased, and such fixtures, additions, structures and signs shall be and remain the property of the Government and may be removed or disposed of by the Government prior to the termination of this lease; provided, however, that all such fixtures, additions structures and signs shall be so designed and placed as to detract as little as possible from the natural beauty of the surrounding area, and *plans for such placement or construction, to the extent permitted by security considerations, shall be reviewed by the Lessor prior to such placement or construction.*

Further the USE PERMIT issued to the Navy authorized (?) by NASA dated July 21, 2016, also states:

> X. ENVIRONMENTAL CONDITION, MANAGEMENT, AND COMPLIANCE
>
> X.2. General Compliance-The NAVY shall ensure that all operations, activities, equipment, and facilities *are in compliance with all Federal, State of Hawai'i, and local environmental laws, statutes, regulations, and ordinances*. Unless stated in this agreement, the NAVY shall be solely responsible for compliance with aforementioned environmental regulatory requirements including environmental permits. The NAVY shall be considered an independent entity responsible for its own actions for the purposes of environmental compliance and permitting matters....

Exhibit C is missing from the USE PERMIT that is to be reviewed every 4 years and shall remain in effect until the expiration of Exhibit "C". In reviewing and attempting to understand **NASA (51 U.S.C.20113(e) authorization, it appears that NASA subleasing Hawai'i State land**

is inappropriate. The final EIS should clearly explain NASA's authority to issue the Use Permit for the Navy to have exclusive use of facilities at KPGO.

The Conservation District rules and regulations were established and initiated on October 1, 1964. The OCCL has no record of authorizations for the Geophysical Observatory. The rules and regulations of the Conservation District noted as Regulation 4 at that time did have a land use that could have been applied for under Section 2. B. Permitted Uses; (1) (d) Public and private utility and similar activities to include areas required for the development, generation, storage, distribution, transmission, receiving, boosting, repeating, maintenance, repair, alteration and related processing of electricity, radio, radar, television, telephone, telgraph, water, sewage, fuel and other similar commodities.

Under current rules, the Geophysical Observatory appears to be an identified land use pursuant to HAR §13-5-22 P-1 DATA COLLECTION (D-1) Data collection, research, education and resource evaluation that involves permanent facilities or structures larger than 500-ft^2 or a land use causing significant ground disturbance or impact to a natural resource.

Regarding both the PMRF and KPGO, the EIS states: "***the wastewater system at Mākahae*** *Ridge is comprised of septic tanks and cesspools*," and "*Cesspools are the primary method fore disposal of wastewater…and are presently utilized at all KPGO sites.*" Cesspools are considered substandard systems that do not treat wastewater, leading to potential ground water contamination and public health risks. The federal ban on large capacity cesspools was enacted in 2000, and the operation of existing systems was prohibited by the EPA by 2005. The final EIS should discuss compliance with this federal mandate.

Should there be any questions regarding OCCL comments, contact Tiger Mills of the Office of Conservation and Coastal Lands at (808) 587-0382 or at kimberly.mills@hawaii.gov.*e*

DEIS Comment Letter 0109

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STATE OF HAWAI'I | KA MOKU'ĀINA 'O HAWAI'I
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LAND
STATE PARKS

August 4, 2025

MEMORANDUM

TO: Dawn N.S. Chang,
Chairperson

FROM: Jessica L. Puff,
State Historic Preservation Administrator
Deputy State Historic Preservation Officer

SUBJECT: Comments on the **Hawai'i Revised Statutes** (HRS) Chapter 343 Draft Environmental Impact Statement (DEIS), for the United States (U.S.) Navy and the National Aeronautics and Space Administration (NASA) Proposed Real Estate Agreements with the State of **Hawai'i for the** Pacific Missile Range Facility (PMRF) and the **Kōke'e** Park Geophysical Observatory (KPGO) at Waimea **Ahupua'a,** Kona District, Island of **Kaua'i**, TMK: (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)e

The State Historic Preservation Division reviewed the Draft Environmental Impact Statement (DEIS) for the proposed real estate agreements with the United States (U.S.) Navy and the National Aeronautics and **Space Administration (NASA) Proposed Real Estate Agreements with the State of Hawai'i for the Pacific Missile Range Facility (PMRF) and the Kōke'e Park Geophysical Observatory (KPGO)**, located at the above-referenced TMKs on the islands of **Kaua'i**. The State Historic Preservation Division (SHPD) has reviewed the DEIS and provides the following comments:

The U.S. Navy proposes to retain the use of 8,172eacres of state lands (684 acres of leaseholds; 7,488 acres **of easement lands) on Kaua'i, Hawai'i, in support of continued and ongoing military training, testing, and** facility operations at the Pacific Missile Range Facility (PMRF). The National Aeronautics and Space Administration (NASA) proposes to retain the use of 23 acres of state lands (16 acres of leaseholds; 7 acres **of easement lands) on Kaua'i in support of maintaining data collection efforts of global significance at Kōke'e Park Geophysical Observatory (KPGO). The Proposed Action includes existing operations that** occur on leasehold and easement lands.

The DEIS is unclear about the proposed mitigation measures for eight significant archaeological sites identified in the Archaeological Inventory Survey (AIS). As required under HRS Chapter 6E and HAR §I 1-200.1-24(p), the DEIS must describe efforts to avoid, minimize, and mitigate adverse effects on historice and cultural resources. The DEIS and final EIS should include proposed mitigation strategies for significante archaeological sites.e

The DEIS and final EIS should include clear documentation of SHPD concurrence regarding the significance of all evaluated sites, especially those considered significant under HRS Chapter 6E in accordance with HRS §6E-8 and HAR Chapters 13-275 and 13-284. Please provide a summary of HRS §6E-8 consultation and any previous SHPD determinations to be included in the DEIS and final EIS.n

SHPD further recommends that the DEIS and final EIS comply with all applicable laws and rules, including **Hawai'i Revised Statutes Chapter 343 - Hawai'i Environmental Policy Act, Hawai'i Administrative Rules** (HAR) Chapter 11-200.1 - Environmental Impact Statement Rules, and HAR §11-200-25, which pertains to the National Environmental Policy Act. This also includes the 1997 Guidelines for Assessing Cultural Impacts adopted by the Environmental Council.

SHPD further recommends early, sustained, and respectful collaboration and consultation with Native Hawaiian Organizations, Native Hawaiian cultural practitioners, lineal descendants, and community stakeholders for the development of the DEIS and final EIS in alignment with the 2023 Department of **Interior's** Departmental Responsibilities for Consideration and Inclusion of Indigenous Knowledge in Departmental Actions and Scientific Research, 301 DM 7.

SHPD requests to review and comment on any construction or land-altering activities in alignment with HRS Chapter 6E and HAR §13-275.

Please contact Dr. Susan Lebo, Archaeology Branch Chief, at susan.a.lebo@hawaii.gov or (808)692-8019 for matters regarding archaeological resources. **Please contact Kauanoe Hoomanawanui, Kaua'i Burial** Sites Specialist, at kauanoe.m.hoomanawanui@hawaii.gov or (808)896-0475 for matters regarding burial sites. If you have any questions about the contents of this letter, please contact Christopher **"Ikaika"** Nakahash SHPD Cultural Historian at chris.nakahashi@hawaii.gov or (808)243-4600.

DEIS Comment Letter 0109

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LAND
STATE PARKS

August 7, 2025

MEMORANDUM

TO: Dawn N.S. Chang
Chairperson

FROM: Curt Cottrell
Administrator, Division of State Parks

SUBJECT: Comments on the U.S. Navy Pacific Missile Range Facility and NASA Kokeʻe Park Geophysical Observatory Draft Environmental Impact Statement Located in Kekaha, and Kōkeʻe on the Island of Kauaʻi Tax Map Key(s): (4)1-2-001:006 (por.), (4) 1-2-001:008 (por.), (4) 1-2-001:010, (4) 1-2-001001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)

Aloha Chairperson Chang,

Thank you for the opportunity to comment on behalf of the Department of Land and Natural Resources, State Parks Division (DLNR - DSP) on the *Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF) and Kokeʻe Park Geophysical Observatory (KPGO) Real Estate, Kauaʻi Hawaiʻi*. DLNR-DSP has reviewed this document, and the comments of DLNR Land Division. We agree with many of the comments made by Land Division and believe that their points address our substantive comments on the DEIS.

The PMRF and KPGO have been our long-term neighbors and partnering agencies at these locations. On-going operations over the last several decades has resulted in some informal agreements between DSP, the Navy, and NASA. DSP would like to take the opportunity of the comment period and this EIS process to document these issues and propose potential solutions.

DSP would like to request the following things from the U.S. Federal Government:

- Consolidation of leases and easements at KPGO to one lease-hold parcel

- retention and formalization of rights to access and use the helicopter landing zone at KPGO
- right of refusal for the excess structures at KPGO,
- upgrade non-compliant large capacity cesspools at KPGO to modern septic systems.
- a trade of water resources, and
- affirmation the State of Hawai'i retains the right to build structures on within the General Hazards Area (GHA) easement of PMRF.

According to the DEIS, the KPGO consists of several lease-hold properties connected by transportation easements. These facilities are enclosed with a fence and effectively operate as a single installation. This situation is a little difficult to track under so many independent agreements. DLNR – SP requests that, should alternative 1 move forward, that these agreements be consolidated as one lease.

At the top of the KPGO, DLNR-SP accesses and uses an area as a helicopter landing zone. This helicopter LZ is of critical importance in our operations related to management of Napali Coast State Wilderness Park. Regardless of what kind of agreement is settled, at the end of this process, DLNR – DSP would like to retain rights to access and use this helicopter landing zone in perpetuity.

The DEIS reports that unused structures will be demolished. DLNR – SP would like to assert a right of refusal. DLNR - SP would like to retain some of the structures that are not being used and re-purpose them for park use. Specifically, we would like to acquire structures at Site A: the former MK-74 Detecting and Ranging (RADAR) site on Faye Road, for use as a State Parks base yard.

Per the comments made by Land Division, the facilities at KPGO use large capacity cesspools as their sewer infrastructure. DLNR – SP would like to reiterate that these facilities must be upgraded to health department compliant septic systems prior to any new lease agreements or land sales. State Parks would also like to assert that, even with the right of refusal, we would like the MK-74 RADAR site to be upgraded to septic prior to transfer.

The State of Hawai'i provides water to KPGO and the Makaha Ridge installation via the Kōke'e State Park water system. DLNR-SP provides up to up to hundreds of thousands of gallons of water to the federal government at no cost. The reason we have not billed for this use is that the water system is in a remote and rugged location, so metering of this use is very logistically complicated. DLNR-SP would like to address this issue with the following proposal: that no change be made to this arrangement, but the U.S. Navy should provide DLNR-SP with water for the southern portion of Polihale State Park, via the Mana Water System. It can be extended from the northern portion of the PMRF to the location of Queens Pond at Polihale. DLNR – SP has a long-range vision to develop out the entrance of Polihale State Park at the area known locally as Queen's Bath. We intend to install a new comfort station, and potentially a small interpretive ranger station. The water requested from PMRF will support these proposed facilities.

Under the current agreements, the U.S. Navy retains an easement for the Ground Hazard Area (GHA). To our understanding, the GHA easement grants the NAVY the authority to clear the area during a missile launch in the event of a misfire. DLNR – SP would like to request formal acknowledgement that construction of such structures would not be in violation of this easement. We are willing to create protocols and procedures that would allow the Navy to continue to close the GHA , including newly proposed structures, during missile launches.

Mahalo Piha for your time. Should you have any questions or concerns please contact State Parks Planner Carl Sholin at carl.e.sholin@hawaii.gov, (808)6368430.

DEIS Comment Letter 0110

Sequoya <energysavant@yahoo.com> 8/7/2025 8:05 PM

EIS comment

To info@pmrf-kpgo-eis.com

Aloha and thank you for the opportunity to attend your informational meetings and your attention to our public comments.

I strongly support the Navy NOT purchasing the land under consideration. I support renewing the lease(s) at fair market value for the land that the Navy and NASA currently control. I feel this will best serve the public and island residents in, among other ways, allowing for long-term oversight for how the land is treated, while allowing the Navy and NASA to continue on with these projects that they deem important.

I do appreciate all the ways that PMRF gives to the community, but really support them in cleaning up after themselves. Among other things, with the pressure on our landfill, we need PMRF to make a sincere effort on reducing waste. And after the Red Hill debacle on O'ahu, I would want to see attention going toward an analysis of any fuel tanks, etc, and proper maintenance to avoid environmental contamination.

Thank you for your consideration.

Sincerely,

Sequoya
Kalaheo Hawai'i

DEIS Comment Letter 0111

Kamakana Ferreira <kamakanaf@oha.org> 8/7/2025 8:14 PM

OHA Comment Re: PMRF Real Estate Renewal EIS

To info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com> Copy Kaiali'i Kahele <kaik@oha.org> • Dan Ahuna <dana@oha.org> • Dawn Chang (Guest) <dawn.chang@hawaii.gov>

Aloha,

Attached is an Office of Hawaiian Affairs (OHA) comment letter on the June 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kauaʻi. Naval Facilities Engineering Systems Command has prepared this DEIS on behalf of the Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) as required by Hawaiʻi Revised Statutes (HRS) 343 and the National Environmental Protection Act (NEPA).

These comments have also been submitted via the online comment portal (https://pmrf-kpgo-eis.com/comments/).

A hardcopy of the letter will be mailed out to you shortly. Please let me know if you have any questions.

Mahalo,

Kamakana C. Ferreira, M.A.
Compliance Archaeologist
Office of Hawaiian Affairs
560 N. Nimitz Hwy
Honolulu, Hi. 96817

(808)594-0227

- Letter 08.07.25_ OHA Comment on DEIS for PMRF Real Estate Renewal, Kauai.pdf (338 KB)

DEIS Comment Letter 0111

PHONE (808) 594-1888 FAX (808) 594-1938

STATE OF HAWAI'I
OFFICE OF HAWAIIAN AFFAIRS
560 N. NIMITZ HWY., SUITE 200
HONOLULU, HAWAI'I 96817

August 7, 2025

Naval Facilities Engineering Systems Command
Environmental OPHEV2
Attn: PMRF and KPGO EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, Hawai'i 96860

Re: Draft Environmental Impact Statement, Pacific Missile Range Facility and Kōke'e Park Geophysical Real Estate EIS, Waimea Ahupua'a, Kona Moku, Kaua'i Mokupuni; Tax Map Key: (4) 1-2-001:006 (por.), 010; (4) 1-2-002:001 (por.), 010, 024 (por.), 025, 026, 027, 028, 029; (4) 1-2-016:011; (4) 1-4-001:002 (por.), 013 (por.), 014 (por.).

Aloha e Ms. Ling:

The Office of Hawaiian Affairs (OHA) is in receipt of the June 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range (PMRF) and Kōke'e Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kaua'i. The Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) published this DEIS for public comment as required by the Hawai'i Environmental Policy Act (HEPA), Hawai'i Revised Statutes (HRS) Chapter 343 and the National Environmental Protection Act (NEPA), 42 U.S.C.A. § 4321 *et seq*. As detailed in the DEIS, existing real estate agreements are set to expire between 2027 and 2030, and the DON is proposing to retain the use of 8,172 acres of State lands to support continued military training, testing, and facility operations at PMRF and Ka'ula Island. NASA also proposes to retain the use of 23 acres of State lands at Koke'e in support of continued operations, including measurements of the Earth's rotation and local land motion at KPGO.

Established pursuant to the terms of Section 5 of the Admissions Act, Pub. L. No. 86–3, 73 Stat. 4, 6 (1959), and Article XII, sections 4, 5, and 6 of the Hawai'i State Constitution, OHA serves as a semiautonomous agency and trust vehicle for the betterment of the conditions of native Hawaiians and Hawaiians. OHA's nine elected trustees exercise their powers "to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiians, including all income and proceeds from that pro rata portion of

the [public lands] trust."[1] By statute, OHA is mandated to: (1) serve as principal public agency in the State of Hawai'i responsible for the performance, development and coordination of programs and activities relating to native Hawaiians and Hawaiians; (2) assess the policies and practices of other agencies impacting native Hawaiians and Hawaiians; and (3) conduct advocacy efforts for native Hawaiians and Hawaiians.[2]

Consistent with its constitutional and statutory duties to advocate for Native Hawaiians and Hawaiians, and preservation of the public land trust corpus, OHA respectfully provides the following comments for the DON's and NASA's consideration in fulfilling their legal duties under HEPA and NEPA:

Public Land Trust Considerations

The DON's current real estate agreements with the Department of Land and Natural Resources (DLNR) include 684 acres of leasehold lands and 7,664 acres of easement lands, for a total of 8,348 acres on the island of Kaua'i. Current leases and easements are used for passive encroachment buffers, as well as for mission readiness, access, and utilities at the following five general locations: Main Base, Kamokalā Ridge, Mānā Water Well, Miloli'i Ridge, and Mākaha Ridge. NASA's current real estate agreements with DLNR include 16 acres of leaseholds and 7 acres of easement lands, for a total of 23 acres. All of these lands are former crown and government lands of the Hawaiian Kingdom. *See* DEIS at 3-92.

OHA has a paramount interest in preserving the corpus of the former crown and government lands of the Hawaiian kingdom until a resolution of the Native Hawaiian people's unrelinquished claims to these lands, including sovereignty and governance over a land base. The state and federal governments have repeatedly recognized the obligation to preserve and protect the State's public land trust as "the foundation (or starting point) for reconciliation" with the Native Hawaiian people for historic wrongs.[3]

> [T]he Apology Resolution and . .e related state legislation clearly contemplate thate native Hawaiians (1) "never directly relinquished their claims to... their national lands to the United States," and (2) "are determined to preserve, develop and transmit to future generations their ancestral territory." As such, we believe and, therefore, hold that the Apology Resolution and related state legislation… give rise to the State's fiduciary duty to preserve the corpus of the public lands trust, specifically, the ceded lands, until such time as the unrelinquished claims of the native Hawaiians have been resolved. Such duty is consistent with the State's

[1] Haw. Const. Art. XII, § 6.
[2] HRS § 10-3.
[3] *Office of Hawaiian Affairs. v. Hous. & Cmty. Dev. Corp*, 177 P.3d 884, 902 (Haw. 2008), *rev'd and remanded sub nom. Hawai'i v. Office of Hawaiian Affairs*, 556 U.S. 163 (2009) (reversed on other grounds).

> "obligation to use reasonable skill and care" in managing the public lands trust and the Ahuna court's declaration that the State's conduct "should... be judged by the most exacting fiduciary tandards."

Id. at 905 (internal citations omitted)

Given OHA's vested interest in the public lands trust and fiduciary duties to our beneficiaries, OHA's June 7, 2024, comment letter on the EISPN, requested that OHA be consulted as part of the lease renewal process along with representatives for the State of Hawai'i. While the DEIS itself is not responsive to this request, we understand from the July 24, 2025, discussion between the OHA Board of Trustees and representatives from the DON and NASA that OHA can expect a formal response to our request for consultation in the near future. We respectfully request that the DON and NASA share this response in the FEIS as part of the records of communications relevant to lease renewal. We further recommend that Section 3.5 include a summary of OHA's public land trust responsibilities and oversight role.

An additional issue of paramount concern to OHA given our constitutional role and duties, as stated in our June 7, 2024, letter, is the status of cleanup and monitoring activities at PMRF given the known harm that military activities can cause. An essential component of the State's duty to protect and preserve trust land is an obligation to reasonably monitor a third party's use of the property.[4] It is unclear, however, whether the State has been actively conducting periodic monitoring and site visits of the lease areas, as necessary to preserve the public lands trust for eventual return to the State of Hawai'i or the Native Hawaiian people. Consistent with this duty, the State should not entertain lease renewal prior to completing an independent assessment of the DON and Navy's compliance with existing lease terms, including those related to cleanup.[5]

Unfortunately, the DEIS does not include any information on periodic monitoring done by the State or whether such monitoring has occurred. Rather, in response to our comment, the DEIS states that "solicitation of past DLNR monitoring and inspection records at PMRF should be made directly to the DLNR." Again, we recommend the DEIS: (1) disclose whether the State has conducted any inspections to date; and (2) disclose any concerns noted by the State as a result of such independent inspection or inspections. The public, in turn, would then be informed and able to comment via the HEPA process on the State's compliance with its mandatory trust duties and how any identified problems are being addressed and remedied.

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[4] *See Ching v. Case,* 145 Haw. 148, 176-77, 449 P.3d 1146, 1174-75 (2019).

[5] While Ka'ula Island or Ka'ula Rock was formally transferred to the federal government in 1924, surrounding state waters and lands have been impacted by bombing over the years and should be part of State investigation into the condition of public lands.

Lease Alternatives

In OHA's June 7, 2024, comment letter on the EISPN, we recommended that the DEIS include a meaningful analysis of a shorter-term lease option. OHA believes a shorter-term lease option is a viable option that the DON is obligated to consider pursuant to NEPA, specifically a lease term that is more than 25 years but significantly less than 65 years (e.g., 30 years). A shorter-term lease option would allow the State to evaluate the progress of the lease and to see if conditions are being met before agreeing to any longer lease extension, and thus is more consistent with its duties as articulated in *Ching v. Case.*

In review of the DEIS Alternative 1, it appears the DON is still pursuing a long-term option, with "long term" use defined as anything greater than 25 years. However, the DEIS also states it is seeking a new long-term lease for a "similar duration" of time to the existing lease. DEIS at 2-8. Thus, we assume a 65-year lease term is being sought even though this is not explicitly stated in the alternative description. OHA advises that Section 2.3.1 of the DEIS should explicitly quantify what lease term is being pursued, as readers could interpret Alternative 1 to include a lease term as low as 26 years. Moreover, and more importantly, the DON should provide a systematic explanation as to its rationale for dismissing shorter lease terms from further analysis, for example 26 or 30 years.

Under Alternative 2, "Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds," the DON is proposing to pursue fee simple acquisition of up to 700 acres of state lands. While OHA is opposed to alienation of the ceded lands base whether through long-term lease or fee simple acquisition, OHA notes that retention of state lands, if pursued, must involve more than simply a "fair market value" evaluation, which refers to monetary valuation of the affected lands. Rather, any retention must include mitigating measures appropriate to the level of harm including, but not limited to, for example, a long-term community benefits package for Native Hawaiians including a commitment to assist with governance initiatives, and definitive commitments for long-term restoration activities. Thus, OHA recommends including further detail in Section 2.3.2 of the DEIS regarding the process that will be pursued for this alternative (i.e., timeline, state compliance, land value assessment), and process for community consultation regarding an appropriate land valuation process.

Historic Preservation Compliance Coordination

In OHA's June 7, 2024, comment letter on the EISPN, we recommended coordination of federal (NHPA Section 106) and state (HRS Chapter 6E) historic preservation review processes with the environmental review process as these processes are essential to identifying historic properties and generating mitigation commitments. In review of the current DEIS, we do see that consultation with SHPD is already ongoing for HRS 6E compliance and that PMRF is operating under a 2012 Programmatic Agreement for NHPA Section 106 compliance that was recently updated in 2024. Further, PMRF has

taken the approach to evaluate historic properties as traditional cultural places (TCP) as part of Section 106 considerations where appropriate to ensure a more holistic approach is applied to understanding cultural resources at the installation. Typically, a TCP designation involves consultation with cultural practitioners since it is a property that is significant to a living community because of its association with a community's traditional beliefs, customs, and practices.[6]

For state level compliance, the DEIS makes clear that all areas within active leaseholds and easements for utilities and roadways have already been surveyed for archaeological and architectural resources. Figure 3.2-1 provides a map of where surveys took place over the leasehold and easement areas. The most recent archaeological inventory survey (AIS) occurred in 2024 specifically in support of the EIS. As part of the 2024 AIS, eight new sites were identified that were determined to be significant under Criterion D and E. Additionally, the Nohili Dune site, which qualifies as a TCP, has also been found to be significant under Criterion A and E. OHA notes that prior to submitting these significance determinations to SHPD, the Hawai'i Administrative Rules (HAR) 13-275-6(c) require consultation with OHA and Native Hawaiians that may find the site important for Criterion E sites. Thus, as the HRS 6E and TCP processes proceed, OHA looks forward to participating in consultation.

As part of the Final EIS, OHA recommends providing a clear timetable for HRS 6E completion (inclusive of tentative consultation and HAR 13-275-6 requirements) and a summary of guidance or comments provided by SHPD so far in Section 3.2 of the DEIS. On the federal side, OHA recommends that updates be provided on the designation of the Nohili Dune site as a TCP and what additional actions (i.e., boundary adjustments, National Register updates, access) and consultations are expected to occur as part of this TCP designation.

Cultural Impact Assessment (CIA)

A CIA was prepared for this project by International Archaeology, LLC, in October 2024. A total of 13 people were interviewed as part of the CIA. Most of the concerns presented pertained to access, including requests to open up camping to local families, and to provide access for surfing, fishing, and shoreline activities. Some informants did note the presence of iwi kūpuna as well. To address access, the CIA proposed use of a Morale, Welfare, and Recreation (MWR) Guest Card and coordination with cultural resource management program for cultural access.

OHA notes that while the DEIS discusses access for cultural practices, it does not discuss the CIA recommendation for use of a MWR Guest Card. The DEIS only mentions

[6] See National Park Service National Register Bulletin titled "Identifying, Evaluating, and Documenting Traditional Cultural Places", December 5, 2024: https://parkplanning.nps.gov/showFile.cfm?sfid=769780&projectID=107663

that an MWR Guest Card Program began in 2005, but does not discuss the program in context of recent CIA suggestions or whether the program has been effective in meeting the community's access needs.

The CIA further indicates that the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 is the guide for coordinating cultural related access, and that access to TCPs are also pending preparation of a TCP study for TCP sites (i.e., Nohili Dunes). Per Table ES-3, the DEIS states that PMRF is intending to streamline access through development of a PMRF Access Management Plan. The relevant SOP is not quoted in the DEIS to provide additional clarity on the existing access program, nor is any timetable or discussion provided on the proposed PMRF Access Management Plan. Aside from PMRF, access to KPGO is only discussed in a single sentence with a statement that reads "requests for access are made via phone or email to the KPGO Site Manager."

While OHA understands that managed access is necessary given the national security interests at stake, OHA supports maximizing public access to the extent feasible and consistent with national security needs. We therefore recommend that Section 3.3.1.4.3 of the DEIS expand its discussion on access to include:

1. the current SOP language that governs access;
2. a timeline for developing access programs for TCPs;
3. a timeline for developing the larger PMRF Access Management Plan;
4. a discussion on the efficacy of the MWR Guest Card Program in light of recent suggestions made in the 2024 CIA, with consideration of a valid Hawai'i driver's license as an alternative identification method to the MWR card; and
5. a feedback process to gauge whether the access program for cultural practitioners is sufficient to meet community needs and interests in accessing significant cultural sites within the PMRF footprint (both state and federal lands).

The latter feedback process is suggested here as it seems based on the 2024 CIA that there are still access concerns. In regards to KPGO access, we recommend development of an actual SOP for consistency with the access process for PMRF.

Acreage Covered

Per the May 2024 Environmental Impact Statement Preparation Notice (EISPN) for this real estate renewal, the DON initially applied for real estate agreements for 8,348 acres in leasehold areas and easements. However, the DEIS is seeking 8,172 acres total (176 acres less) without any clear explanation for the difference from the EISPN. The difference in acreage is also apparent within the DEIS itself as the DEIS's supporting studies (i.e., cultural impact assessment) contained in the appendices still notate 8,348 acres. The

difference appears to be in the amount of easement lands for Kamokalā Ridge, with the DEIS claiming only 179 acres versus 355 acres in the EISPN. Appendix D of the DEIS omits a "restrictive use" easement (ESQD Easement S5604) of Kamokalā Ridge from the EISPN totaling 176.371 acres.

OHA also notes that there are differences in the Tax Map Key (TMK) numbers in the EISPN and the DEIS (i.e., TMK (4)1-2-002:012, 013, 015). Notation of such changes and explanations are typically provided so the public can understand differences or revisions in scope as the HRS 343 process proceeds. Thus, OHA recommends an explanation be provided for the change in acreage and Tax Map Keys (TMKs) between the DEIS and EISPN. More importantly, if there is in fact a reduction in acreage (i.e., easement S5604), then the DEIS should explain how those lands will be restored (if being returned to the state) or what their disposition is.

Additionally, it appears to OHA that the requested total acreage amount is being rounded to the nearest whole number in the DEIS. It's clear from Table 1-3 and Appendix D that the actual acreage extends out two to three decimal places, totaling 8,171.516 for PMRF and 22.900 for KPGO. This is a little over half an acre (.584) less than what is being presented for real estate renewal. OHA recommends that the requested leasehold amount be as accurate as possible within the DEIS, unless there is an explanation for any inconsistencies (i.e., if the DON is rounding down for the total acreage requested). Again, if there is any reduction in acreage from what is currently being leased, then the EIS must explain how those lands will be restored (if being returned to the state) or what their disposition is.

Biological Resources

In OHA's June 7, 2024, comment letter on the EISPN, we recommended early consultation with the United States Fish & Wildlife Service (FWS) and the Division of Forestry and Wildlife (DOFAW) as these entities can offer guidance on federal and state level compliance, respectively. We further emphasized the importance of consultation with cultural practitioners as part of biological surveys and any related conservation actions.

On the federal side, the DEIS demonstrates that the DON has been in consultation with the FWS, with the most recent Biological Opinion being issued in 2025. On the state side, the DEIS reports that there is regular coordination with DOFAW personnel on invasive and protected species response efforts, and emerging landscape-scale issues. However, the discussion on page 3-60 regarding DOFAW is quite short and very general. While OHA does appreciate that the DEIS discusses the ongoing work with DOFAW, the DEIS could better elaborate on these consultations with a summary of provided advice and active collaborations in Section 3.4.1.1.4.

OHA observes on the PMRF website (https://pmrfkauai.com/Natural-and-Cultural-Resources) that PMRF is actively engaged with community partners as part of cleanup

efforts and stewardship actions. This is not elaborated upon in Section 3.4 of the DEIS. Some of these activities were explained to OHA when we did a site visit of the installation on March 21, 2025, with PMRF leadership and cultural resources staff. Partnerships with DOFAW were specifically mentioned as an important part of active conservation work. OHA recommends that these community activities as they relate to biological resources be better elaborated upon in Section 3.4 of the DEIS so the public is aware of these programs and all activities occurring on state lands.

Moreover, while the region of influence (ROI) analyzed in the DEIS is limited to the state lands currently leased by the DON and NASA in support of their respective activities, these lands are of course integral and important for continued operational success. Therefore, while military activities are currently undergoing concurrent environmental review, OHA notes that DON training and test activities at PMRF have significant impacts on marine ecosystems, particularly marine mammals, given the use and testing of Navy sonar from the PMRF area. Even within the defined ROI, the use of bright lights at both DON and NASA facilities can negatively impact breeding, feeding and migration of native seabirds including threatened and endangered species. Given the significance of these cultural/biological resources to OHA's beneficiaries OHA requests that a more complete summary of effects on biological resources be provided in addition to a reference to other relevant federal review documents. *See, e.g.*, DEIS at 3-85.

Closing Remarks

Mahalo for the opportunity to comment. OHA looks forward to seeing our comments taken into consideration as the Final EIS is being prepared. Should you have any questions, please contact OHA's Compliance Advocate, Kaweni Ibarra at (808) 582-0488 or by email at kawenii@oha.org.

'O wau iho nō me ka 'oia 'i'o,

Stacy Ferreira
Ka Pouhana, Chief Executive Officer

SF:kikfll

CC: Kaiali'i Kahele, Ke Kauhuhu, Chair, OHA Board of Trustees
Dan Ahuna, Ke Kua 'O Kaua'i, OHA Trustee for Kaua'i
Dawn Chang, Chairperson, Board of Land and Natural Resources

DEIS Comment Letter 0112

Felicia Cowden <fcowden@kauai.gov> 8/7/2025 8:37 PM

testimony on PMRF dEIS

To info@PMRF-KPGO-EIS.COM <info@pmrf-kpgo-eis.com> Copy Stephanie Reid <sreid@kauai.gov> • Jade Tanigawa <jtanigawa@kauai.gov> • Hope Kallai <hkallai@kauai.gov> • Lyndon Yoshioka <lyoshioka@kauai.gov>

Aloha Kerry and PMRF & KPGO teams,

Thank you for all you do for our island and our country.

Mahalo for the time taken to meet with me.

Please accept my attached testimony.

PMRF dEIS COMMENTS 08.07.2025 .docx

With respect,

- PMRF dEIS COMMENTS 08.07.2025 .docx (142 KB)
- image001.png (608 Byte)

DEIS Comment Letter 0112

COUNTY COUNCIL
Mel Rapozo, Chair
KipuKai Kualiʻi, Vice Chair
Addison Bulosan
Bernard P. Carvalho, Jr.
Felicia Cowden
Fern Holland
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Council Services Division
4396 Rice Street, Suite 209
Līhuʻe, Kauaʻi, Hawaiʻi 96766

August 7, 2025

Naval Facilities Engineering Systems
Command Environmental OPHEV2
Attn: PMRF and KPGO RE EIS Project Manager, Ms. Kerry Wells
400 Marshall Road, Building X-11
Pearl Harbor, HI 96860

RE: PMRF and KPGO DRAFT EIS COMMENTS

Aloha Ms. Wells,

In my individual capacity as a Kauai Councilmember, please find below my comments regarding the Pacific Missile Range Facility (PMRF) and the Koke'e Park Geophysical Observatory (KPGO) Draft Environmental Impact Statement (EIS).

Kaua`i's PMRF is deeply valued for the contributions it provides for the effectiveness of our Navy missions and the safety of our servicemen and women through effective training. It is also acknowledged that PMRF has a history of being a good partner to the neighboring communities and the State and County government in times of need such as firefighting, among other joint efforts. For these reasons I support Option 1 of a renewed lease, however the continuation of the lease should not be extended beyond reasonable military use of the land for the existing training purposes.

A challenge in an effective response to the dEIS is the limitation of discussing the draft lease Environmental Impact Statement independent of the essential Environmental Assessments for both the Integrated Natural Resources Management Plan and the PMRF Land Based Training and Testing which were supposed to be completed ahead of this EIS. The Kawai`ele Pump Operation, the Open Floodable Space, as well as sensitivity to the operations on Ka`ula Island are also relevant though not addressed in this dEIS.

Two concerns exist for potential reasons why the Mana plain may no longer be ideal for this application as time progresses:

1.) Sea Level Rise and passive flooding is anticipated to increase by up to 3' by 2100. PMRF has been built on a natural wetland environment which has been drained for roughly a century through a series of pumps and wells lowering the groundwater, for as much as -3 feet, most currently at -.5ft, for the benefit of agriculture use and later for PMRF's placement. This has

created a substantial drying of the land in the general region, negatively impacting the earlier vibrant wetland biosphere of fish, native birds and rich alluvial soils. Historical

2.) Warfare and Military technology are rapidly evolving to a degree that existing facilities are likely to need substantial changes or may no longer even be necessary. These future

Improving infrastructure viability and broader contributions would be valuable. The dEIS reflects in inadequate wastewater treatment facility on the base. Either the description needs to be corrected, or the wastewater treatment facility needs to be brought to current EPA standards. The well and pump descriptions do not appear to be accurately reflected based on recent discussion with Kekaha Ag Association regarding the agricultural water system information. Please check for accuracy. The Market Rate rent references in the dEIS are incomplete. There would be great value to reflect an anticipated range of annual payment for the leased use and how that money would be applied. The west-side of Kauai has significant infrastructure and housing needs. An understanding of an economic land-use relationship would be beneficial in balancing the military installation's impact on the island.

Please address the military risk to the community in the increasing political tension in foreign relations. The dEIS does not identify any safety bunkers on the base for the workers, nor for the near vicinity communities of Kekaha or Wailua were there to be any time of airstrike to the base.

Committed continuance of shore and mountain access for traditional practices, fishing, hunting, gathering and even recreation needs to be clarified.

If you may have any additional questions, please feel free to contact me or Council Services staff at 808-241-4188 or via email to cokcouncil@Kauai.gov.

Sincerely,

Felicia Cowden

FELICIA COWDEN
Councilmember, Kauai County Council

DEIS Comment Letter 0113

Hope Kallai <lokahipath2@live.com> 8/7/2025 9:22 PM

PMRF. DEIS comments

To kerry.k.wells.civ@us.navy.mil • info@PMRF-KPGO-EIS.com <info@pmrf-kpgo-eis.com>

Aloha e Kerry and EIS Team - Attached please find my comment letter on the PMRF DEIS. Please let me know if it doesn't open correctly.

Mahalo,

Hope Kallai

- 2025 Aug. 7 PMRF EIS comments .pdf (808 KB)

DEIS Comment Letter 0113

info@pmrf-kpgo-eis.com
kerry.k.wells.civ@us.navy.mil

August 3, 2025

RE: ***PMRF and KPGO Real Estate***
Draft Environmental Impact Statement

Aloha e Kerry and EIS Team:
Please consider my comments in the Final Environmental Impact Statement on PMRF leases and easements.

1. PMRF RUNWAY REPLACEMENT NOT ADEQUATELY CONSIDERED IN THIS DEIS[1]. In Table ES-1 under Biological Resources on page ES-7, Volume 1, the DEIS states "there would be no change in operations or current activities on the leasehold and easement land" considered in both Alternatives 1 and 2, but the ***PMRF Land-Based Training and Testing EA***[2] considers many-fold increases in many operations on base lands and easements.

The ***PMRF Land Based EA*** Pdf page 27 states:

> The Proposed Action also includes increases in training and testing activities conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight.

The ***PMRF DEIS*** Volume 4, Pdf page 1324[3] states:

> "Currently, PMRF is limited to the number of landings/takeoff allowed per runway design and life cycle. In 2025, it is anticipated the runway will be replaced to allow for additional flights and accommodate increased aircraft exercises from DoD agencies. Projections for future air operations at PMRF are detailed in Figure 1. This includes a projected increase in usage by C-17 cargo airplanes (from 176 passes per year to a projected 4,320 passes per year) and the ability of 1,440 MV-22 Osprey landings per year at PMRF."
> "On average, the PMRF airfield accommodated 6,441 takeoff/landings annually between 2014 and 2020."

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[1] https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of-4.pdf

[2] https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf

[3] https://pmrf-kpgo-eis.com/media/5qyjldgz/pmrf-and-kpgo-re-deis-appendices-i-l_volume-4-of-4.pdf

PMRF DEIS Volume 4, Pdf page 1325 includes Figure 1 showing doubling of air operations at PMRF (below). This runway upgrade on USA fee simple land allows for significant increases in air operations and military activities, like RIMPAC, held every other year for 5 weeks with 36 nations involved, on fee simple, state leasehold and easement lands as 1 "Activity."

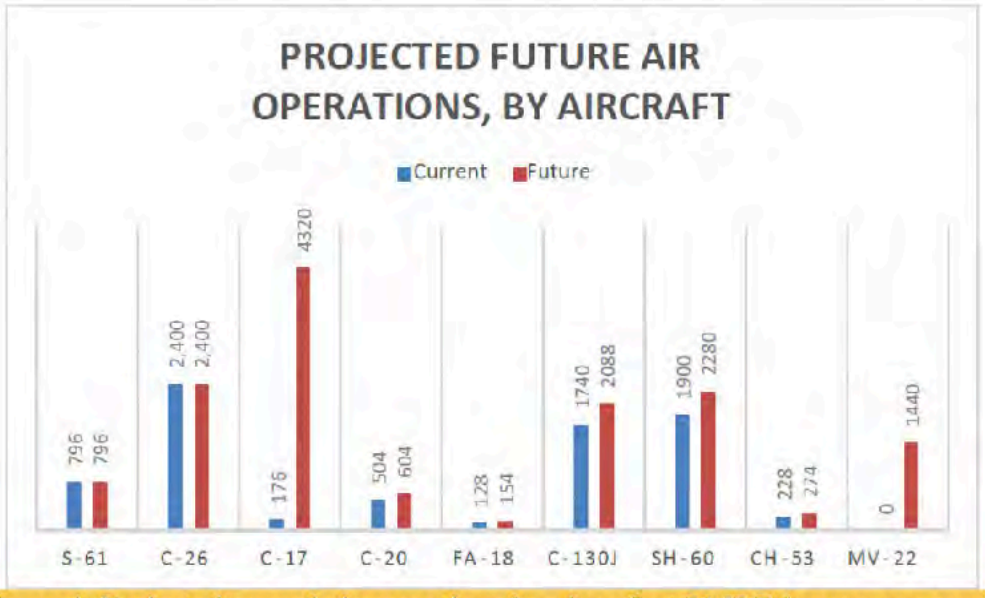

Figure 1. Projected annual air operations by aircraft at PMRF (passes per year).

Aircraft	Current	Future
S-61	796	796
C-26	2,400	2,400
C-17	176	4,320
C-20	504	604
FA-18	128	154
C-1301	1,740	2,088
SH-60	1,990	2,280
CH-53	228	274
MV-22	0	1,440
Annual	7,962	14,356

2024 PMRF Land-Based Training and Testing EA, Pdf page 30.

PMRF Land-Based Training and Testing Draft EA August 2024

Activity Name	Activity Description	Training & Testing Area	Ongoing # of Annual Activities*	Proposed # of Annual Activities
Forward Arming and Refueling Point (FARP) Operations	Establish, operate, and re-deploy a FARP site using the Tactical Airfield Fuel Dispensing Systems, Helicopter Expedient Refueling System, or similar type expeditionary aircraft refueling system. Aircraft examples: MV-22, KC-130, CH-47, AH-64, FA-18, F-35, P-8.	FARP Areas	1	20
Small Unmanned Aircraft Systems (sUAS) and Counter-Unmanned Aircraft Systems (UAS) Operations	Conduct sUAS operations. Launch and control sUAS. Conduct counter-UAS operations. Launch and control a counter-UAS system from a land location.	UAS Launch Area	2	45
Parachute Operations	Conduct parachute operations (land).	ARDEL Circular Drop Zone (CDZ), Bunker CDZ, Golf Range CDZ, and Kukui CDZ	1	15
Command, Control, Computing, Communications, Cyber, Intelligence, Surveillance, Reconnaissance and Targeting Exercise to include Command Post Exercise, Communication Relay Exercise	Establish and operate a tactical field command post, communication systems, radar tracking and surveillance systems, optical tracking systems, and electronic warfare equipment operated on concrete areas or by mobile vehicles.	North Launch Area 1	1	30
		North Launch Area 2	5	12
		South Launch Area	1	18
		MDA Hard Stand	2	10
Bivouac (unit, medium, large)	Establish and operate expeditionary field lodging for personnel conducting training.	Airfield Bivouac Area	5	25
		MDA Hard Stand	1	4
		Palai Olani	1	5
		North Launch Area 2	1	9
		Alternate Bivouac Area (ARDEL)	1	2

DEIS Comment Letter 0113

Table 2.1-1: Proposed Training and Testing Activity Descriptions

Activity Name	Activity Description	Training & Testing Area	Ongoing # of Annual Activities*	Proposed # of Annual Activities
Missile, Rocket, and Aerial Target Drone Launch	Terrestrial portion of launching missiles, rockets, and aerial target drones from established launch areas ashore. Aerial or surface target intercepts to occur offshore, on or above water.	North Launch Area 1	16	15
		North Launch Area 2	9	20
Missile, Rocket, and Aerial Drone Target Set-up (No Launch)	Conduct non-live-fire missile or rocket system launch preparation by deploying, making ready for launch, and redeploying a transportable tactical missile or rocket system.	North Launch Area 1, North Launch Area 2, and South Launch Area	1	6
Artillery	Terrestrial portion of land-based forces live firing of artillery guns at surface (waterborne) or air targets.	North Launch Area 2	1	3
Amphibious Operations (Raid, Small Boat Operations, Swimmer Insertion/Extraction)	Raid. Company (unit-sized) forces move from amphibious ships at sea, conduct amphibious landing via various vessels/watercraft/vehicles, and conduct follow-on activities ashore. Return to amphibious ships at sea.	Waiapuaa Bay Amphibious Landing Area	1	2
	Small Boat Operations. A Unit using small boats move from offshore location to a beach landing site, carry boat to an inland site, conduct reconnaissance, and then return to the sea via small boat.	Waiapuaa Bay Amphibious Landing Area, and Divers Landing	2	19
	Swimmer Insertion/Extraction. Personnel conduct Over-the-Beach water entry swimmer insertion and extraction training in PMRF amphibious landing areas.	Waiapuaa Bay Amphibious Landing Area, Divers Landing, and Over-the-Beach Landing	1	2

PMRF Land-Based Training and Testing Draft EA August 2024

Activity Name	Activity Description	Training & Testing Area	Ongoing # of Annual Activities*	Proposed # of Annual Activities
Air-to-Ground Gunnery Exercise (GUNEX)	GUNEX involves strike fighter aircraft and helicopter crews employing guns and inert rockets to attack ground targets, day or night, with the goal of destroying or disabling enemy vehicles, structures, or personnel. Inert ordnance only. GUNEX may include the use of targeting laser.	Kaula Island	14	24
Air-to-Ground Bombing Exercise (BOMBEX)	BOMBEX involves training of strike fighter aircraft delivery of inert ordnance only against land targets in day or night conditions and may include the use of targeting laser.	Kaula Island	12	31
Helicopter/Tilt-Rotor Landing Zone (LZ) Operations (off airport surface)	Helicopter/Tilt-Rotor aircraft conduct LZ Operations (off airport surface). Deliver/recover personnel or equipment from/to unimproved landing zone locations.	Fire Pit LZ	1	12
Ground Maneuver	Units conduct land movement to other land locations.	Improved roads and pathways	1	22

*Quantity represents the highest single-year activity occurrences, over the period 2018–2023.

The ***PMRF Land-Based Training and Testing Draft EA*** still under consideration, includes many new operations over leasehold and easement lands, not included in this real estate EIS which enables them. The impacts of runway replacement should be considered adequately in this DEIS. It is the most important feature of an air base and determines operations.

The Proposed Action also includes increases in training and testing activities conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight.

PMRF Land-Based EA Training and Testing EA includes Table 2.1-1 (above) on Page 30, detailing operations by “activities,” which could be hours, days, weeks or months. It is impossible to extrapolate how many landings would occur in ”20 activities” of unknown timing, duration or involvement.

This EA was supposed to be finalized prior to this EIS. This EA should be considered in a Supplemental Land-Based Operations EIS to this real estate EIS. Runway replacement and the resulting increase in activities are not considered in the EA. 20 Refueling training activities annually are proposed on the Nohili dunes, on Conservation District lands. [4]

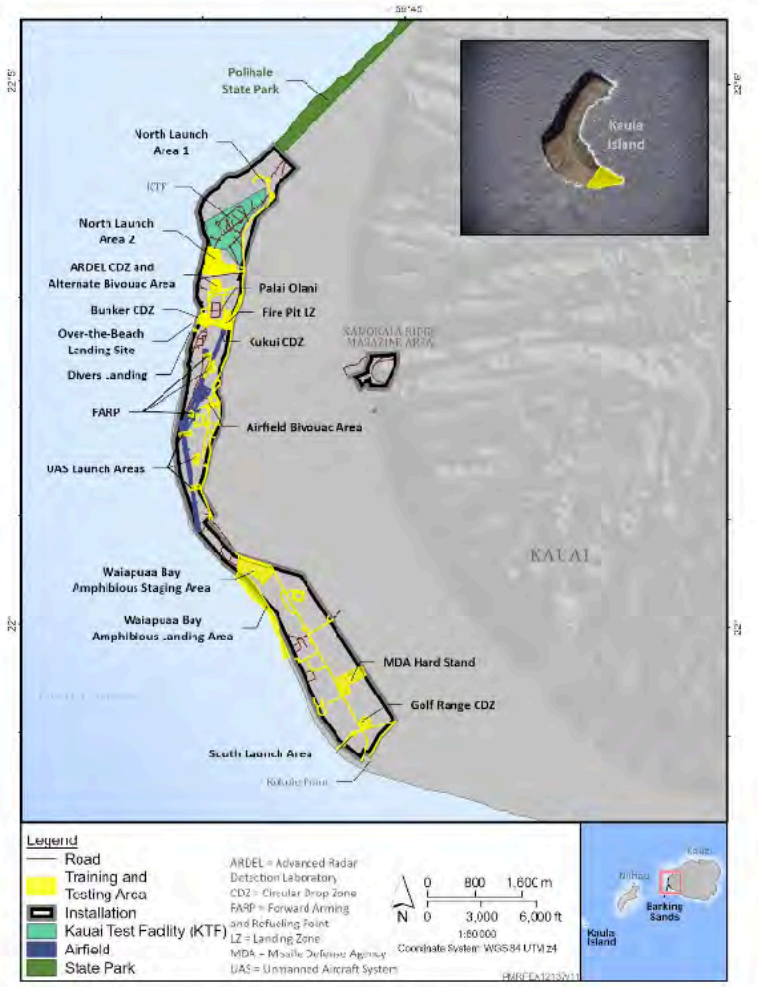

Figure 2.1-1: Training and Testing Sites in the Study Area

[4] https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf. PDF Page 29

2. The consideration of "No impact" is based on stale science and past operations. Because past levels of operations have not had significant impact, it cannot be assumed that these great increases would not. Doubling or tripling training operations as proposed in the 2024 PMRF Land-based Training and Testing EA[5] has great potential for additional impacts to the lands and infrastructure considered in this DEIS. Some activities are quadrupled, some increased from 1 event annually to 30, to be held when humpbacked whales, monk seals and turtles are not present. BASH activities, hazing and relocations will be increased.

PMRF Incidental Take Permits, 2014, 2017 & 2025

Bird Species	2014 Cause *2025 Cause*	Take Average	Take Limit 2014 2025	Egg/Nest Take	Egg/Nest Limit
Newell's Shearwater **'Ua'u kani**	Fallout due to lighting. *Collision with towers* *Collision with elec lines*	Up to 3 fledgelings/yr	Up to 9 fledgelings/yr	2017 ITP Up to 3/yr	
Hawaiian Petrel. **'Ua'u**	Fallout due to lighting	Up to 1 every 10 years	Up to 2 fledgelings/yr	2017 Up to 2/yr	
Band-rumped Storm Petrel **'Akē'akē**	Fallout due to lighting	Up to 2 every 10 years	Up to 4 fledgelings/yr	2017 Up to 2/yr	
Hawaiian Hoary Bat **'Ōpe'ape'a**	Barbed-wire fence entanglement *Vegetation Maintenance*	Up to 1/ 3 yr *Up to 2 adults, 4 pups/yr*	Up to 3/yr. *Up to 4/yr*		
Hawaiian Goose **Nēnē**	Collision, vehicles. *Aircraft Operations* *Nest Removal/relocation* *Launch Pad Ops* *Oxidation Pond refine*	Up to 2/yr *Up to 10/yr* *Up to 4/yr air ops* *Up to 3/yr nest reloc.* *Up to 1 nest/yr launch.* *Up to 1 nest/yr refine*	Up to 4/yr. *Up to 7/yr nest reloc*	Up to 10 eggs or goslings due to nest failure or abandonment *Up to average of 3 nests/yr; max 7/yr nest removal zone.* *1 nest/yr launchpad* *1nest/yr Oxi pond*	Up to 50 eggs or goslings due to nest failure in suboptimal habitats after being relocated by base hazing
Hawaiian Moorhen **'Alae'ula**	Collision, vehicles *Aircraft collisions*	Up to 2/yr *Up to 5/yr* *Up to 1/yr air ops*	Up to 4/yr. *6/yr* *+3/10 yr*		
Hawaiian Coot **'Alae ke'oke'o**	Collision, vehicles. *Aircraft Operations.* *Oxidation Pond*	Up to 1/yr *Up to 2/yr* *Up to 1/yr Air Ops.* *Up to 1/yr pond relining*	Up to 2/yr *Up to 4/yr*		
Hawaiian Duck. **Koloa Maoli**	Collision, vehicles. *Aircraft Operations.* *Oxidation Pond* *Incidental capture*	Up to 1/yr *Up to 3/yr* *Up to 1/yr air ops.* *Up to 1/nest yr relining* *Up to 3/yr capture*	Up to 2/yr *Up to 8/yr* *+3/10 yr*	*Up to 1 nest /yr*	
Hawaiian Stilt **Ae'o**	Collision, vehicles. *Aircraft collision*	Up to 1/yr *Up to 1/yr* *Up to 1/yr air ops*	Up to 2/yr *Up to 2/yr*	Up to 20 chicks or eggs or 5 nests lost in suboptimal habitat after being relocated by base hazing	
01EPIF30-2014-F-0066 01EPIF30-2015-F-0227 01EPIF30-2016-F-0497 *EISX-007-17-* *USN-1749043386*					

[5] https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf

The 2014 Incidental Take levels established by the USFWS, (Pdf page 1225, Vol. 4) had to be increased due to increasing bird mortality due to vehicle and aircraft collisions, tower and electrical line impacts and botulism outbreaks in the Oxidation Ponds.

The 2025 take levels found on Page 1371, Vol 4 are greatly increased, but not enough to reflect the expected increase due to escalating training activities presented in the EA.

The ***2023 Integrated Natural Resources Management Plan***[6] states on Pdf page 188 :

> An avian botulism outbreak occurred in the winter of 2014/2015 at Barking Sands, resulting in the loss of at least 22 birds including 20 Hawaiian Ducks and 2 Hawaiian Coots. Two additional Hawaiian Ducks were captured and rehabilitated by the SOS veterinarians and released. Since then, smaller outbreaks have occurred in the summer as well as winter but have been relatively under control due to increased monitoring efforts.

The Incidental Take Permit levels established by USFWS would have been exceeded for 20 Hawaiian Ducks and 2 Hawaiian Coots as there are no Incidental Take considerations for mortalities caused by repeat outbreaks of avian botulism in the Oxidation Ponds. There must be a better option for base wastewater than putting raw sewage in open, unlined ponds so near the ocean, with abundance of impacted endangered waterbirds. Alternative options for wastewater are not considered in this EIS. Botulism outbreak prevention methods were not considered in this EIS, even with takes and annual outbreaks.

3. The Cultural Impact Assessment was inadequate in community outreach. The only Native Hawaiians interviewed had generational economic ties to the base. Non-base Hawaiians need to be interviewed and their comments considered. Many Scoping Session cultural practitioner commentors have been impacted greatly by base security measures. These longterm leaseholds have restricted access and cultural practice for 3 generations already. The ongoing impacts to traditional cultural practices and gathering not adequately considered, especially fishing and spiritual practices around Nohili Dunes. An alternative launch site to Nohili should be considered, not on unique sand dunes considered necessary for spiritual recharge and connecting with ancestors, considered Traditional Cultural Property (TCP) in this DEIS. Why this place

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[6] https://pacific.navfac.navy.mil/Portals/72/NAVFAC_PACIFIC/Documents/NEPA Info/2024/Final Draft PMRF INRMP December 2023.pdf?ver=BJZPkLdupQezP8EePj3thg==

for missile launches? What alternative was considered? How can the base rent of the lease of this unique property full of iwi kūpuna be determined?

There should be a culturally appropriate place to reconnect with ancestors that does not require a base pass, unobtainable to many community members.

The impact of missiles and magazines underground at Kamokalā, in a pali surrounded with cultural sites, rock walls, heiau and leina is not appropriately considered in this DEIS or even understood by outsiders.

Photo 84. Feature 1 at Site IA002: rock wall on southern side; view to the east.

Part of ancient rock wall on Kamokalā Ridge, by magazine ordnance area.

The DEIS conversely states there are 10 underground missile magazines, with Magazines 12 and 13 being constructed in 2012 and 2013 on Tract E-3, Parcel 1 and E-3, Parcel 2 and the Kamolakā Ridge addition. It is unknown what the presence of munitions magazines does to the market value or lease rate of these lands or if more magazines will be necessary for the increased operations.

One underground missile silo is intended as evacuation shelter for an unknown number of base residents. Capacity and facilities should be

included. DEIS should include evacuation procedures for multi hazard events for all levels of base training events.

The continued military presence in a formerly neutral kingdom impacts everybody in Hawaii, not just westside Kauaians. Many testifiers at the public meetings were angry and hurt about being kept out of their traditional lands. There is generational angst abut the base that no EIS can fix

4. EIS does not adequately consider the impacts of passive flooding and sea level rise from climate change. The only Climate Change impacts considered were coastal not including the re-watering of 3 square miles of former historic marsh from passive flooding predicted to be 2' by 2050. Current pumpage rates will not suffice to dry the swamp, much of which is below sea level.

Volume 1 of DEIS includes a 3.2' Sea Level Rise map on page 164, only stating:

The following leasehold and easement lands are located within the 3.2-foot sea level rise exposure area scenario for purposes of BLNR's analysis under HEPA:

•Leaseholds:
•Tract E-1,
•Tract E-2,
•Tract E-2-A,
•Lot 1, Lot 3,
•Lot 7, Lot 10,
•Lot 13,
•Lot A-1,
•Lot B; and

•Easement Lands:
•GHA Easement 1,
•GHA Easement 2, Easements 100 – 104, Easement B,
•Easements B-1 – B-6, Easement D,
•Easement F,
•Easement G Pt 1, Easement G Pt 2, Easement H

Consideration of long term leases in a tsunami zone requiring the ongoing draining of swamp land deserves way more consideration than just a mere list of impacted lease lands and an orange colored map to show sea level rise, usually shown in blue. There is no operational information included for each leasehold, which is considered in the uncompleted EA.

There is inadequate consideration for the hydrology of Mānā Plain and the series of 26 miles of ditches transporting water through the drained swamp in **3.7 Water Resources**, pdf page 274, Vol.1. PMRF and dryland agriculture in the Mānā Plain are dependent on the continued de-watering of the 1,700 acre Mānā Swamp.

The Mānā Well (TMK 412002028, Water Lot 12, a 0.264 acre Ag zoned property, Market Value $224,400, including access road, Sixth Amendment to General Lease No. S-3852), (Amendment 6), CSF 24336) providing potable drinking water to the base, is under leasehold consideration. An estimate for the lease rent for this valuable well site is not included. The only alternatives (purchase or no lease) did not consider the well operation being taken over by any other leaseholder, like DHHL or KAA or ADC. The DEIS does not consider the impacts of no pumping. How much of the Mānā Plain would rewater and how deep?

DEIS does not mention cost of pumped groundwater or if the CWRM has established a pumpage limit.Estimates included in the DEIS are the Mānā Well pumps 2 MGD, the main base using about ~.5 MGD. The remainder ~1.5 MGD needs to be explained.

In the ***2014 FEA Mānā Plain Wetland Restoration Project***[7] includes consideration of a 2012 water budget analysis completed by Kamman Hydrology & Engineering, Inc. A salt budget was also performed. The wetland basins created to form Kawai'ele Waterbird Sanctuary are supplied with groundwater, except basin N3, which uses only ditch water and N13 which uses a mixture of ditch and groundwater. The groundwater comes from an artesian well on ADC state property at about 30-35 gpm. This contribution of artesian well water is not considered in the PMRF DEIS from this well and any other unused, now artesian, wells in the former swamp.

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[7] https://files.hawaii.gov/dbedt/erp/EA_EIS_Library/2014-02-08-KA-FEA-Mana-Plain-Wetland-Restoration-Project.pdf

It is unknown if the water budget was updated for this re-established 100 acre wetland and if a water budget will be updated again after completion of the proposed 200 acre Open Floodable Space REPI project.

The DEIS barely mentions the draft NPDES permit (HI0021940/HI0021945) required for the ditch outfalls on Navy fee-simple lands and the water quality issues of atrazine, metolachlor, turbidity and 40 other agricultural chemicals found in the water delivered from ADC lands and the shrimp farm. The NPDES permit needs to be completed for inclusion in the FEIS.

In 2021, ***Impact of Sea-Level Rise on the Hydrologic Landscape of Māna Plain, Kaua***i[8] abstract states:

> **Abstract**
>
> The Mānā Plain is a land apart, buffered from oceanographic influences by ~3–35 m high backshore deposits, and drained by an intricate, >100-y-old ditch system and modern, large-capacity pumps. Quantifying present and prospective inputs and outputs for the hydrologic landscape suggests that, although sea-level rise (SLR) will begin to impact ditch system operations in 2040, transient, event-based flooding caused by rainfall, not SLR induced, multi-mechanism flooding, will continue to pose the most immediate threat. This is because as sea level rises the ability of gravity flows to discharge storm runoff directly into the ocean will diminish, causing floodwater to pond in low-lying depressions. Estimates of the volume of water involved suggests the risk of flooding from surface water is likely to extend to 5.45 km2 of land that is presently ≤ 1 m above sea level. This land will not be permanently inundated, but weeks of pumping may be required to remove the floodwater. Increasing pumping capacity and preserving some operational ability to discharge storm runoff under the influence of gravity will enhance the ditch system's resilience to SLR and ensure it continues to fulfill its primary functions, of maintaining the water table below the root zone and diverting storm runoff away from farmland, at least until the end of this century.

Weeks of pumping to remove floodwater would greatly impact base operations, not considered in this DEIS. Future agriculture in the Mānā plain may revert to wetland taro and fish farms.

Page 10 of the Impact of Sea-Level Rise report states:

> For example, were an event of similar magnitude to the March 2020 storm to occur towards the end of this century, the mixed semidiurnal tidal cycle (which has a mean and diurnal range of 0.38 m and 0.56 m, respectively) superimposed on the projected 1 m rise in sea level would increase the amount of time required for floodwater to drain freely to the ocean by ~50%.

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[8] https://www.mdpi.com/2073-4441/13/6/766

Page 12 continues:

> On this basis, by the end of this century 25% of the agricultural land on the Mana Plain may be exposed to flooding that is an indirect operational consequence of SLR. This land will not be permanently inundated, but it could require weeks of pumping to remove the accumulated floodwater, and the present pumping capacity of ~189,000 m^3/day will likely need to be increased.
>
> SLR will reduce the proportion of storm runoff that is able to flow into the ocean through Kinikini Ditch, and its near-term effects will begin tobe felt by 2040. After which time the ditch system be vulnerable to seawater intrusion if the ditch plug is removed to allow water to be discharged under the influence of gravity. As sea level rises and gravity flows can no longer be relied upon to deliver water originating from drainages on Pu'u Ka Pele slope directly into the ocean, the propensity for low-lying land on the Mana Plain to flood will also increase. The risk of flooding from surface water could extend to all 5.45 km^2 of land ≤ 1 m MSL (Figure 4c). Although this land will not be permanently inundated it may require weeks of pumping to remove the floodwater.

An alternative should be considered in the DEIS if the base needs to move, retreat and/or relocate some facilities to higher ground. Alternative 2 is only a change of tenure, not a real alternative consideration.

Sustainable Yield of this Kekaha aquifer 20301 is estimated to be 10 million gallons per day. Consideration of the Mānā Well pumpage is not considered in the 2024 Kauai Water Use and Development Plan, which states current pump rates for entire aquifer is 1.58 MGD, with 2035 total buildout being 1.72 MGD. Total General Plan buildout is predicted to use 4.28 MGD. I believe the other wells in Kekaha contribute to the current 1.58 MGD pump rate, military pumpage of 2 MGD not included. Abandoned, now flowing artesian wells are not included. There are mistakes and omissions in the current usage rates considered in SY.

5. DEIS fails to consider the Conservation District Use Permit application process. Conservation District impacts not adequately considered and there is lack of discussion about obtaining Conservation District Use Permits, even on state lease lands. It is unsure what zoning is appropriate for ordnance assembly and missile launching, but a site considered spiritual Traditional Cultural Property should not be a launch pad for war training.

6. Base construction does not adhere to FEMA flood specs, the 2019 National Defense Authorization Act and 50 year project life. Base operations will be severely compromised with 2' passive sea level rise. Considerations under this DEIS in are not compliance with federal and state policies, like Coastal Zone Management. The Base Flood Elevation (BFE) for the base is between 15' and 25'. The FEIS must adequately

consider impacts of increased flooding due to climate change and alteration of precipitation event intensity.

7. DEIS fails to explain why Ocean Right-of-Way lease of 7,680 acres of submerged lands expiring in 2030 is not being considered and the future usage of those nearshore lands.

> The Navy currently holds a lease for 7,680 acres of submerged lands in an ocean right-of-way (ROW) at PMRF, which is also set to expire in 2030. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy will continue to use this area pursuant to Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq., and U.S. Constitution Article I, Section 8, Clause 3. The use of submerged lands within the ROW area will remain consistent with current usage for navigation and national defense purposes (i.e., for underwater cables supporting at-sea training ranges[9]). In the future, if the Navy's use of this area significantly changes, the Navy would take appropriate actions in accordance with NEPA and inform stakeholders as appropriate.[10]

DEIS is unclear about impacts of increased training exercises over this ROW and if these cables are obsolete, will they be removed?

8. Bifurcating real estate and land based operations into HEPA/NEPA EIS and NEPA EA segmentalizes project.

Decisions on land leases cannot be made independent of operational considerations for those lands. The amount of Hawaii projects being concurrently presented is overwhelming.

Currently, there are way too many cumulative impacts and secondary impacts from all the concurrent EIS/EA proposals[11] that have not been considered. Final acceptance of this EIS must include consideration of the concurrent projects being proposed:

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[9] All data transmitted from the undersea cables are received by facilities on Navy fee simple land, where the data is then recorded and processed. These activities operate independently from the leased parcels in the Project Area.

[10] https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of-4.pdf. PDF page 69.

[11] https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf

DEIS Comment Letter 0113

1. Hawaii-CA Training and Testing EIS/OEIS (in water)
2. PACDERMA System Project-Underwater Electromagnetic Measurement System Testing EA (in water).
3. Open Floodable Space EA (land based)
4. Kawai'ele Pump Operation and Maintenance (land based).
5. Integrated Natural Resources Management Plan EA.
6. PMRF Land Based Training and Testing EA (land based).
7. PMRF-KPGO Real Estate EIS (land based).

9. There should be no long term leases for military operations without annual cleanup requirements and periodic inspections. The DEIS describes piles of Navy metal rubbish left in the Koke'e forest that need to be removed from state lease lands.

Rubbish, including metal, old fencing, burnt barrels, cars and car parts, concrete, glass and unknowns, need to be cleaned up ASAP, with annual cleanup conditions and inspections included in the leases.

Photo 55. Site IA012: Bundles of rusted barbed wire found adjacent to canal; looking west.

tal burnt barrel pile at Site 50-30-01-2049; looking south.

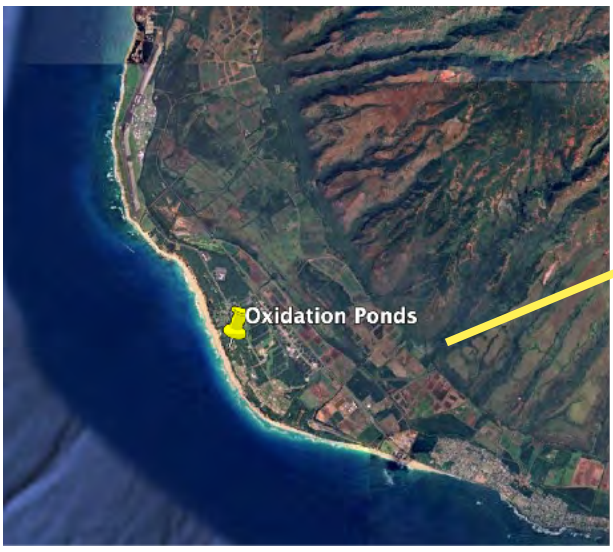
Photo 45. Example of concrete and metal debris rubble pile; looking north.

The entire 158 acre Ka'ula Island seabird sanctuary is "inaccessible" due to years of unexploded ordinance (UXO) that missed the 10 acre target area. The entire island must be cleaned up with current avian surveys before expanded operations can be considered, like 24 GUNEX and 31 BOMBEX activities annually.

No state land leases without inspections and annual clean up. No more UXO left forever on state land.

10. Alternatives to the base sewer "Oxidation Ponds" should be considered to prevent avian botulism, reduce hazing needs and to move from tsunami zone. Surface dumping of untreated base wastewater and sewerage into unlined ponds has created inadvertent habitat for waterbirds, and is the only surface water available on the main base, besides the ditches, creating a high risk condition for algae blooms and botulism outbreaks.

The take of 20 Hawaiian Ducks and 2 Hawaiian Coots in the 2015/2015 botulism outbreak cannot be repeated. Ponds should either be entirely fenced off from birds (creating potential increased impacts to bats) or replaced with tanks. ITP should include botulism takes.



Open, un-lined, untreated sewage ponds with algae blooms, turbidity and botulism, near the ocean, the only available surface water habitat..

11. There needs to be an onsite biologist to daily monitor takes under the Incidental Take Permit, not base staff, during the 10-year term of the Incidental Take Permit. DEIS Page 1243, Vol. 4 states:

> *KESRP Field Assistant*
> The Navy provided a full-time Endangered Seabird Field Assistant to the Hawaii DLNR KESRP for four months in 2012 (15 May through 15 September). This position was funded by the Navy at a total of $28,000. The Navy also funded KESRP in the summer of 2013 to conduct nest monitoring in currently-known Newell's shearwater colonies on Kauai at a funding level of approximately $40,000.

The Navy should fund annual salaries for 2 full-time DLNR Seabird Field Assistants for the base monitoring and off-site seabird mitigation improvements for the entire lease term. The Na Pali Seabird colony is statistically significant so night flights and training activities should be discouraged during seabird nesting from mid-March to November.

12. Use of trained conservation dogs should be expanded and backup dogs obtained. Herding by trained dogs may have the least impacts of all BASH alternatives. Carcass recovery is improved thousand-fold by daily use of dogs. DLNR Seabird Field Assistants may receive Conservation Dog Training and be the handler. Use of Conservation Dogs is essential.

13. Final Jurisdictional Wetland Determination should be obtained from USACE and included in FEIS. The Wetland Determination, beginning on PDF Page 1,426, Vol. 4 concludes on page 1,450 with:

> **CHAPTER 5**
> **Conclusion**
> Based on the results of the wetland delineation, there are **17 individual PEM/PSS wetlands i**n the study area, comprising approximately **22.96 acres**, which exhibited the necessary parameters to be considered jurisdictional wetlands and **16.25 acres of ditches that should be considered potential waters of the U.S**. (see Table 3 and Figures 8–11 in Appendix A).
>
> The USACE, under the authority of Section 404 of the CWA and Section 10 of the Rivers and Harbors Act, has the authority to make the final determination of the jurisdictional status and extent of waters of the U.S., including wetlands, within the study area. This report represents the best scientific judgement and opinions of the Stantec biologists that conducted the delineation and should be considered preliminary until concurrence has been obtained from the USACE Honolulu District in the form of a Jurisdictional Determination.

DEIS Comment Letter 0113

A USACE Jurisdictional Determination needs to be included in the FEIS.

Figure 5 Wetland Delineation USGS Topographic Map

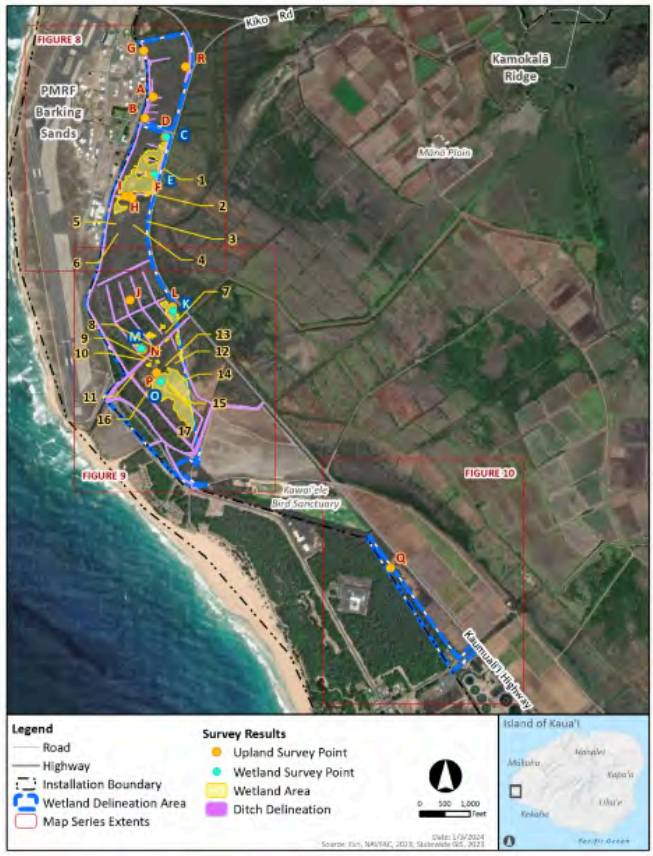


Figure 8 Wetland Delineation Survey Overview

Figure 9 Wetland Delineation Survey 1 of 3

Figure 10 Wetland Delineation Survey 2 of 3

Figure 11 Wetland Delineation Survey 3 of 3

Photo 1. Data Point C, Wetland

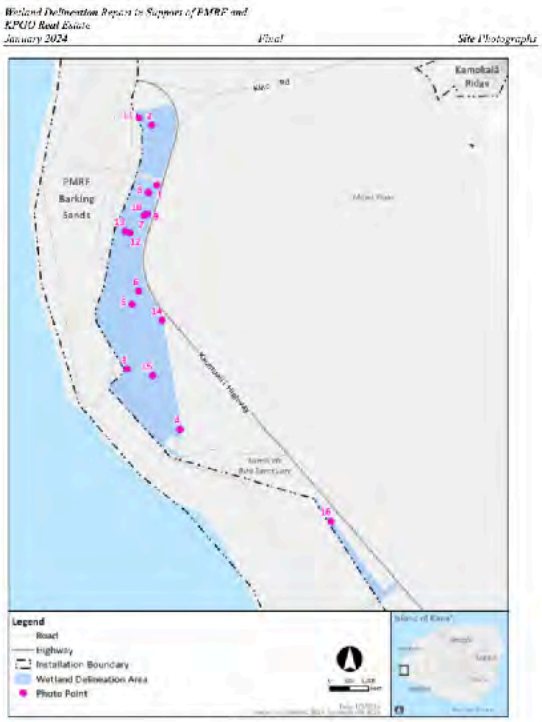


Figure 12 Location of Photo Points

Photo 5. Smaller Ditch, Typical

Photo 2. Smaller Ditch, Typical

Photo 4. Larger Ditch, Typical

Photo 9. Data Point E, Wetland

Delineated Wetlands at Mānā

The USACE Jurisdictional Determination needs to be obtained and the future hydrology of the 22.96 acres of wetlands and 16.25 acres of WOTUS ditches established and considered in the FEIS.

The Operational Land-Based DEA should be expanded to a Supplemental EIS and increased operations specific to the lease lands being considered.

As with the Pōhakuloa lease consideration, the Navy has had 65 years to complete the required science for this base real estate lease

consideration. The Navy should finish their science before applying for long-term leases.

The FEIS should include consideration of the re-watering of the 22 acres of delineated wetlands and how much water will be required to re-establish suitable habitat for waterbirds, along with the 200 acre REPI grant project, the Open Floodable Space[12]:

> **3. Open Floodable Space EA**
> The proposed action is to manage a 200-acre open floodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals.

The Ongoing Environmental Reviews at PMRF[13] does not include a timeline for the Floodable Space Project EA and the Kawai'ele Pump Operation and Maintenance EA, but does for the remaining 5 concurrent projects.

> **3. Open Floodable Space EA**
> The proposed action is to manage a 200-acre open loodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals.
> **4. Kawai'ele Pump Operation and Maintenance EA**
> The Navy proposes to continue operation and maintenance of a pump system on 3 acres of federal land to control water levels and preserve the agricultural viability of surrounding lands within Mana Plain.

Both these EA's need to be included for consideration in the FEIS as they determine the dry future of the base and operations and the use of huge modern pumps on old, eroding ditch systems.Again, the Navy should finish their science before applying for long term leases.

Climate change is not adequately considered in this DEIS, with climate change flooding impacts expected at PMRF by 2040, not in compliance with the 2024 Department of Defense Climate Adaptation Plan[14] which calls for plans that can sustain for 50 years, not 15.

---

[12] https://cnrh.cnic.navy.mil/Portals/79/PMRF_Barking_Sands/Documents/PMRFProjectDescriptionsFINAL20250521WEB.pdf?ver=nQfhkxtqWzTA7q_XdFwudw==

[13] https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf

[14] https://www.sustainability.gov/pdfs/dod-2024-cap.pdf

14. Only the shortest long-term lease should be considered. Lease term is unspecified, except in the USFWS Biological Opinion which states 50 years. Page 1226, Volume 4 of the DEIS states:

> The term of the proposed action is 50 years.

A 50 year lease is way too long. Unpredictable changes in technology will have advanced so much in the next 50 years, PMRF may be obsolete within 50 or 65 year lease term..

Right before the last 65-year lease was issued, my family lived on Midway Island. My father was a Navy pilot, and flew a Willy Victor on the DEW Line. That was of paramount importance back then. Now, few non-uniformed folks even know what that means. Sixty-five years from now, missiles may be antiquated and archaic, replaced with lasers from space or technology totally unknown to us now. Or perhaps from underwater.

It is also impossible to predict the future depth of the Mānā Swamp groundwater aquifer and how much pumping will be necessary to keep lands contiguous to the base dry. Only the shortest long-term lease should be considered by BLNR, after the Navy completes science and reports.

It is not the military's job to control development on the Mānā Plain, the wetlands determine appropriate activities, which may be lo'i kalo and loko i'a not ranching.

15. Alternatives should be presented in this DEIS for retreat from the shoreline and historic marsh areas as they will soon be wet again. You can't wage war on the ocean The ocean always wins.

Mahalo for your considerations and including my comments in the FEIS.

Hope Hamilton Kallai
POB 655
Kilauea, HI 96754
lokahipath2@live.com

DEIS Comment Letter 0114

Jessica K <jessntd@gmail.com> 8/7/2025 10:11 PM

I am overall in favor of Alternative 3 but have a mixed opinion and suggestion

To info@pmrf-kpgo-eis.com

Aloha Ms. Kerry King, my name is Jessica Kuzmier and I am a resident of Hawai'i. I would like to offer my testimony with regards to the PMRF and the Koke'e Park Geophysical Observatory.

First I would like to thank you and the Navy for your service to our country and your brave dedication. It is much appreciated. I also am glad for the privilege to offer testimony.

I have assessed your alternatives as presented and with regards to what you have offered I find Alternative 3 the best out of the 3 that you offered. However, based on my preference I would like to see the Koke'e Park Geophysical Observatory be maintained within that and pursued as a fair market leasehold fee for the easement to compensate the state. I also would like to see the Navy to work with the State, and the residents of Kaua'i, to maintain the full acreage of the PMRF Agricultural Preservation and to allow easements for residents to access the beach.

I am glad to see that the Navy has tried to be open about cultural preservation and environmental concerns but it is has been a hard history between the military and the state of Hawaii, particularly that of Native Hawaiian residents. I don't know how I feel about any military activity taking place in Ni'ihau, as this has been a place that has been set aside by our state for the purposes of conservation and cultural preservation. I believe in this day of computers and artificial intelligence it seems that when it comes to military practicing, much of this can be done remotely and this is why I am all right with the geophysical park and if there are to be missiles down on federal land, they are there simply for military readiness.

I have heard that we here in Hawai'i have been buzzed by Russian and Chinese spy planes near the PMRF, but it is hard to know if this is classic which came first the chicken or the egg.

I understand that Hawai'i is a military target, but after Red Hill and Kaho'olawe I believe that since the Navy has a military presence in Kaua'i, it must conduct a great deal of transparent due diligence pertaining to cleaning up what it messes up and the kind of activities it conducts even on federal lands, because the ocean belongs to all of us and once it is damaged for good, then it is gone.

Thank you again for the opportunity to voice my concerns as a resident of Hawai'i, and for your hard work. Jessica Kuzmier, Hawai'i

DEIS Comment Letter 0115

Sherri Cummings <malamaanahola.sc@gmail.com> 8/8/2025 3:19 AM

comments to the PMRF DEIS

To info@pmrf-kpgo-eis.com Copy Terrill James Kane Alii Williams <tkanealiiw@gmail.com> • kawaikapuhewett@hotmail.com

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Aloha,

Please see the attached documents of my written comments.

Mahalo,
Sherri Cummings
Heir of James McHutcheson Sinclair
Royal Patent 2944
Island of Ni'ihau

--

Sherri-Lee U'ilani Cummings
President & Chairman of the Board
malamaanahola.sc@gmail.com
808.635.2085
malamaanahola.org

- Cummings, Sherri_PMRF DEIS Comments.pdf (11 MB)

DEIS Comment Letter 0115

August 7, 2025
Sherri Cummings

Pacific Missile Range Facility
United States Department of the Navy
Email: info@PMRF-KPGO-EIS.com

Formal Notice Regarding --- Draft Environmental Impact Statement for the Proposed United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA) Kōkeʻe Park Geophysical Observatory Real Estate, Kauaʻi, Hawaiʻi; Tax Map Keys: 4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1-2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4) 1-2-002:027, (4) 1-2-002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.):

I'm commenting on the DEIS by the Pacific Missile Range and am expressing my opposition to this matter.

The DEIS for the renewal of the military's lease of the west lands (Kona Moku) of Kauai, provides no current information reflecting the full scope of boundaries that are associated with its asks. As a lineal descendant from Niihau and the Puna and Kona Moku, I rise as an Ohana, whose migratory pattern includes that of the Kaulukahi Channel. These same waters were used as a means to gather for sustainable needs as well as traditional practices, (from Ni'ihau to Ke'e, Kaua'i), as done by my foremother Hoa'aloha and forefather Wahinealoha Keo, through oral accounts passed down through our kupuna. The Kapa'akai Analysis is not done to satisfaction.

In addition, there was no consultation process by the Hawaii State Aha Moku that was legislatively passed, to assure Native Hawaiians of its space in manners such as this. As a lineal descendant of Niihau there was no representation of my Ohana. PMRF and the Hawaii State Aha Moku representatives from the Kona moku and Ni'ihau did not make others available for lineal and cultural consultation.

Furthermore, I am calling attention to the certified affidavit of myself, which I am providing (Exhibit 1), as well as Keith G. Bukoski as recorded in the Bureau of Conveyance showing lineal descent from Mr. James McHutcheson Sinclair as heirs to Royal Patent 2944 on the Island of Niihau. We are challenging the current process of the DOD and the Robinson Family regarding the Environmental Assessment for failing to contact us.

Finally, my comments here do not constitute the Kapa'akai Analysis that is required by law. I expect to be contacted moving forward as landowners and lineal descendants of Ni'ihau and whose families have historically lived in Koloa (Puna District) and Waimea (Kona District) Kaua'i.

Mahalo,

Sherri Cummings
Heir of James McHutcheson Sinclair
Royal Patent 2944
Island of Ni'ihau
Email: malamaanahola.sc@gmail.com

Exhibit 1

THE ORIGINAL OF THE DOCUMENT
RECORDED AS FOLLOWS:
STATE OF HAWAII
BUREAU OF CONVEYANCES
DOCUMENT NO. ____
DATE - TIME ____ Doc A - 9347000752
8/4/2025 2:11 PM

LAND COURT REGULAR SYSTEM

(AREA ABOVE RESERVED FOR RECORDING INFORMATION)

After Recording return by [X] Mail or [ ] Pick-up. Phone#: (808) 635-2085

Sherri Cummings
2878 Pikake Street,
Lihue, HI 96766

TITLE OF DOCUMENT: AFFIDAVIT OF: Sherri Cummings

TAX MAP KEY(S): (1)-1-001-001-0000
ROYAL PATENT: 2944

This document consists of 14 pages.

NIIHAU AFFIDAVIT OF SHERRI CUMMINGS

STATE OF HAWAII)
) SS.
CITY AND COUNTY OF HONOLULU)

This instrument was made on 4th day of August 2025, by Sherri Cummings who resides at 2878 Pikake Street, Lihue, HI 96766 upon first duly sworn desposes and sayeth:

First I, Sherri Cummings, also known as Sherri-Lee Uilani Cummings, am of lawful age and competent and was born on November 25, 1969 as proven by Certificate of Live Birth (Exhibit A)

Second That Ruby Kawaiulailiahi Pia, also known as Ruby P. Cummings, is my mother as proven by Certification of Live Birth (Exhibit A).

Third That Mariam Ethel Taniguchi, also known as Miriam Taniguchi, is the mother of Ruby Kawaiulailiahi as proven (Exhibit B) and therefore is my grandmother.

Fourth That Elizabeth Charman is the mother of Mariam Ethel Taniguchi as proven by Certificate of Marriage (Exhibit C) and therefore is my great-grandmother.

Fifth That Sarah Charman, also known as Sarah Sinclair Charman and Sarah Sinclair, is the mother of Elisabeth Charman, also known as Elizabeth Charman and Elizabeth Taniguchi, as proven by Hoike Hanau (Exhibit D), Obituary (Exhibit E), and Obituary (Exhibit F) and therefore is my great-great grandmother

Sixth That James Sinclair, also known as James McHutcheson, was the father of Sarah Sinclair Charman, also known as Sarah Sinclair, as proven by Obituary (Exhibit F) and Certificate of Death (Exhibit G) and therefore is my great-great-great grandfather.

Seventh That James McHutcheson Sinclair is the awardee of Royal Patent 2944 as proven by a certified copy of Royal Patent 2944 Palapala Sila Nui, Ano Alodio (allodial title) (Exhibit H)

The above instrument and information contained herein are true and correct to the best of my knowledge, are set-forth for cause, superseding and all previous denials of aforementioned. I may have made, and my signature and seal hereinafter are the voluntary act of my own hands and FURTHERMORE SAYETH NAUGHT.

Subscribed, Sealed and Affirmed this 4th day of August in the year of our lord And savior, Two Thousand and Twenty-Five.

Sherri Cummings

STATE OF HAWAII)
City) SS:
COUNTY OF HONOLULU)

Subscribed and sworn before me this day: August 04, 2025

JODY A. WONG NOTARY PUBLIC Comm. No. 04-529 STATE OF HAWAII

Print name, Jody A. Wong
Notary Public State of Hawaii
My commission expires: Jody A. Wong Notary Public, State of Hawaii My Commission Expires: September 19, 2028

CERTIFICATION
Document Date: 08/04/25 Pages: 14
Notary Name: Jody A Wong First Circuit
Document Description: Affidavit

Notary Signature: 08/04/2025

JODY A. WONG NOTARY PUBLIC Comm. No. 04-529 STATE OF HAWAII

STATE OF HAWAII
DEPARTMENT OF HEALTH
RESEARCH AND STATISTICS OFFICE

CERTIFICATE OF LIVE BIRTH

FILE NUMBER 151

69 014144

1. CHILD'S FIRST NAME	MIDDLE NAME	LAST NAME	2a. DATE OF BIRTH (MONTH, DAY, YEAR)	2b. HOUR
Sherri-Lee	Uilani	CUMMINGS	November 25, 1969	8:48 A.M.

3. SEX	4a. THIS BIRTH—SINGLE, TWIN, TRIPLET, ETC. (SPECIFY)	4b. IF NOT SINGLE BIRTH—BORN FIRST, SECOND, THIRD (SPECIFY)	5a. COUNTY OF BIRTH	ISLAND
Female	Single		Kauai	Kauai

5b. CITY, TOWN, OR LOCATION OF BIRTH	5c. INSIDE CITY LIMITS (SPECIFY YES OR NO)	5d. HOSPITAL—NAME (IF NOT IN HOSPITAL, GIVE STREET AND NUMBER)
Lihue	Yes	G. N. Wilcox Memorial Hospital

6a. MOTHER—FIRST NAME	MIDDLE NAME	MAIDEN NAME	6b. AGE (AT TIME OF THIS BIRTH)	6c. STATE OF BIRTH (IF NOT IN U.S.A., NAME COUNTRY)
Ruby	Kawaiulailiahi	Pia	35	Hawaii

7a. RESIDENCE: STATE	7b. COUNTY	7c. CITY, TOWN OR LOCATION	7d. INSIDE CITY LIMITS (SPECIFY YES OR NO)	7e. NUMBER AND STREET
Hawaii	Kauai	Hanamaulu	Yes	

7f. MOTHER'S MAILING ADDRESS	STREET OR R.F.D. NO.	CITY OR TOWN	STATE	ZIP
	P. O. Box 215	Hanamaulu	Hawaii	96715

8a. FATHER—FIRST NAME	MIDDLE NAME	LAST NAME	8b. AGE (AT TIME OF THIS BIRTH)	8c. STATE OF BIRTH (IF NOT IN U.S.A., NAME COUNTRY)
Gary	Frank	Cummings, Sr.	35	Hawaii

9a. INFORMANT—SIGNATURE I certify that the stated information is true and correct to the best of my knowledge.	9b. RELATION TO CHILD	9d. IS FATHER AN ACTIVE MEMBER OF U.S. ARMED FORCES? (YES OR NO)
Ruby P. Cummings	Mother	No

10d. CERTIFIER—NAME (TYPE OR PRINT)	10c. ATTENDANT—M.D., D.O., MIDWIFE, OTHER (SPECIFY)
Samuel R. Wallis, M.D.	M.D.

10a. CERTIFIER—SIGNATURE I certify that the above named child was born alive at the place and time and on the date stated above.	10b. DATE SIGNED (MONTH, DAY, YEAR)
Samuel R Wallis MD	November 28, 1969

11a. REGISTRAR—SIGNATURE	11b. DATE RECEIVED BY LOCAL REGISTRAR	11c. DATE ACCEPTED BY STATE
Deputy Alice Inomoto	December 2, 1969	DEC -5 1969

EVIDENCE FOR DELAYED FILING OR ALTERATION

HAWAII DRIVER LICENSE

NUMBER H00257837
DOB 11/25/1969 EXP 11/25/2005

HT	WT	HAIR	EYES	SEX	CTY
5-5	135	BRO	BRO	F	K

ISSUE DATE 12/15/2003 CLASS 3 RESTR ENDORSE

CUMMINGS YOKOTAKE,SHERRI-LEE,UILANI
P.O. BOX 441
HANALEI, HI 96714

TERRITORY OF HAWAII

BUREAU OF VITAL STATISTICS
HONOLULU, T. H.

No. C 45987

I, THE REGISTRAR GENERAL OF VITAL STATISTICS, do hereby certify the following to be a true and correct copy of the Certificate of Birth of

RUBY KAWAIULAILIAHI PIA

on file in the Bureau of Vital Statistics, Honolulu, office of the Board of Health of the Territory of Hawaii.

1. PLACE OF BIRTH — Local Registered No. _____ (To be inserted by Registrar) — Vol. No. 558
County Kauai — State T. H. — File No. 6183
Township Waimea — or Village Waimea
City _____ No. _____ St. _____ Ward
(If birth occurred in a hospital or institution, give its name instead of street and number)

2. FULL NAME OF CHILD RUBY KAWAIULAILIAHI PIA (If child is not yet named, make supplemental report, as directed)

3. Sex: Female — If twin, triplet, or other: 4. _____ 5. Number in order of birth _____ — 6. Premature _____ Full Term Yes — 7. Legitimate? Yes — 8. Date of birth January 23, 19 34 (Month, day, year)

FATHER	MOTHER
9. Full name: JOHN PIA, JR.	18. Full maiden name: MIRIAM TANIGUCHI
10. Residence (usual place of abode) (If non-resident, give place and State): Hanamaulu, Kauai	19. Residence (usual place of abode) (If non-resident, give place and State): Hanamaulu, Kauai
11. Color or Race: Chinese-Hawaiian — 12. Age at last birthday: 27 (years)	20. Color or Race: Part-Hawaiian — 21. Age at last birthday: 17 (years)
13. Birthplace (city or place) (State or Country): Hanamaulu, Kauai T. H.	22. Birthplace (city or place) (State or Country): Koloa, Kauai T. H.
OCCUPATION: 14. Trade, profession, or particular kind of work done, as spinner, sawyer, bookkeeper, etc.: Laborer	OCCUPATION: 23. Trade, profession, or particular kind of work done, as housekeeper, typist, nurse, clerk, etc.: Housewife
15. Industry or business in which work was done, as silk mill, saw mill, bank, etc.: Federal Aid	24. Industry or business in which work was done, as own home, lawyer's office, silk mill, etc.: Own Home
16. Date (month and year) last engaged in this work: - , 19 — 17. Total time (years) spent in this work: 2 months	25. Date (month and year) last engaged in this work: - , 19 — 26. Total time (years) spent in this work: -

27. Number of children of this mother (At time of this birth and including this child) (a) Born alive and now living 1 (b) Born alive but now dead 0 (c) Stillborn 0

28. If stillborn, period of gestation _____ months or weeks — 29. Cause of stillbirth - (Before labor / During labor) — 29a. Was a prophylactic for ophthalmia neonatorum used? No — If so, what? - — 30. Has this child any deformity? (Yes or No) -

CERTIFICATE OF ATTENDING PHYSICIAN OR MIDWIFE*

I HEREBY CERTIFY that I attended the birth of this child, who was born alive (Born alive or stillborn) at 3:00 P.M. on the date above stated.

(Signed) John Pia, Jr.
(Father) Informant
Physician, Midwife or Informant
Address Hanamaulu, Kauai, T.H.

* When there was no attending physician or midwife, then the father or mother should make this return.

Given name added from a supplemental report _____ (Date)

FILED January 27, 19 34 R. J. Mansfield (Date) Registrar.

REGISTRAR GENERAL.

FILED, Office of Registrar General February 5, 1934 (Date)

IN TESTIMONY WHEREOF, I have hereunto subscribed my name and caused the official seal to be affixed, at Honolulu, City and County of Honolulu, this 30th day of July, 19 40.

M. T. Lemon
Registrar General

ok

TERRITORY OF HAWAII
DEPARTMENT OF HEALTH
BUREAU OF HEALTH STATISTICS

CERTIFICATE OF MARRIAGE

License No. 27935
T. H. File No. 4 908

1a. First Name of Bridegroom: John	b. Second Name: Kuku	c. Last Name: Pia, Jr.	2. Date of Birth (Month, Day, Year): Aug. 4, 1906
3. Usual Residence: a. City or Town: Hanamaulu, Kauai	b. State or Foreign Country: T. H.		4. Race: Part Haw'n.
5. Place of Birth: a. City or Town: Hanamaulu, Kauai	b. State or Foreign Country: T. H.		6. Occupation: Gen. laborer
7. Father: a. Full Name: John Kuku Pia, Sr.	b. State or Country of Birth: T, H.	c. Race: Part Haw'n.	d. Living? No
8. Mother: a. Maiden Name: Kahinawe Keo	b. State or Country of Birth: T. H.	c. Race: Part Haw'n.	d. Living? Yes
9a. First Name of Bride: Miriam	b. Second Name: Ethel	c. Last Name: Taniguchi	10. Date of Birth (Month, Day, Year): Oct. 14, 1916
11. Usual Residence: a. City or Town: Hanamaulu, Kauai	b. State or Foreign Country: T. H.		12. Race: Part Haw'n.
13. Place of Birth: a. City or Town: Koloa, Kauai	b. State or Foreign Country: T. H.		14. Occupation: At Home
15. Father: a. Full Name: Puaokina Taniguchi	b. State or Country of Birth: T. H.	c. Race: Part Haw'n.	d. Living? No
16. Mother: a. Maiden Name: Elizabeth Charman	b. State or Country of Birth: T. H.	c. Race: Part Haw'n.	d. Living? Yes
17. Place of Issue: a. Judicial District: Lihue	b. County: Kauai		c. Date of Issue (Month, Day, Year): Nov. 14, 1955

18. *I hereby certify that* John Kuku Pia, Jr. (Bridegroom) *and* Miriam Ethel Taniguchi (Bride) *were joined in marriage by me in accordance with the laws of the Territory of Hawaii in the* Lihue *Judicial District, County of* Kauai *on this* 16th *day of* November *19* 55.

Signature of Witness: William A. Brede	Signature of Bridegroom: John Kuku Pia Jr.	
Signature of Witness: Julia Brede	Signature of Bride: Miriam Ethel Taniguchi	
Place of Ceremony: Hale Leolea - Lihue, Kauai, T. H.	Signature and Title of Officiant: Elder: Henry C. Skelton L.D.S. Church	
19. Signature of Local Registrar: Acting Thomas B. Lyons	20. Date Accepted by Local Registrar: 11/17/55	21. Date Filed with Registrar General: DEC -6 1955

DEIS Comment Letter 0115

Hoike Hanau, ma ka Apana o Koloa ka Mokupuni o Kauai M. H. 1897

Mahina i Hanau ai.	La.	INOA.	He Keiki Kane a Wahine	KAHI I HANAU AI	o la Aenei?	NA INOA O NA MAKUA.	KELA MEA KEIA MEA.
Mar	7	Joseph	K	Lawai		Akana & Genoveva	Maria Kofekinau.
"	30	Joseph	K	Koloa		Akina & Piikana	" "
April	3	Adelada	W	"		Jose & Maria Almeida	Portuguese
June	8	Not named	K	"		Henry & Kapuaiwailau	Chairman Haw.
"	10	alfred [illegible]	K	[illegible]		Hondo & Luke Ledward	Half-caste
Feby	18	Charles Ihinichi Iuka	K	Koloa		[illegible]	Japanese
"	1	" "	W	"		Doi	" "
"	6	" "	W	"		Jono	" "
Mar	28	" "	W	"		Naia & Minamina	" "
~~April~~		" "				Kataka	" "
June	18	" "	K			~~Otia~~	" "
"	19	" "	K	"		Otia	" "
July	11	" "	K	"		Okamula	Mala "
"	12	" "	K	"		Koopii 2nd Namuole	Half caste
Aug	19	Elisabetth	W	"		William & Sarah	Chairman " "
"	19	Not named	W	"		W. 2nd Anna Abling	German
"	10	" "	W	"		Inoe	Japanese.
Sept	1	" "	K	"		Hamamoto & Matis	" "
"	18	" "	W	"		Lui 2nd Kanolona	Kalunakoopii Hawaiibus

DEIS Comment Letter 0115

Sarah Charman

KAMAAINA DIES ON ANNIVERSARY

Mrs. Sarah Charman Passes On 55th Anniversary of Her Marriage

(Special Star-Bulletin Correspondence)

KOLOA, Kauai, July 9.—Mrs. Sarah Sinclair Charman, well known kamaaina on Maui and Kauai, died at her home on June 30, the 55th anniversary of her marriage to William Charman of Koloa, Kauai. She was 68 years and 8 months old.

Following her marriage she had the honor of spending her honeymoon at the home of King Kalakaua at Kapahi, Kauai.

She was a prominent figure with Queen Emma, Queen Kapiolani, Princess Likelike and other alii.

When Kalakaua was crowned king of Hawaii she was an invited guest at his home, and she was queen of the pa-u riders at the celebration of Queen Victoria's jubilee.

She was a lover of flowers and rare plants and spent much time in her garden all her life, and also took a keen interest in the radio programs from Honolulu.

She had 16 children, of whom nine are living. They are George Charman, Mrs. Alice Wright, Henry Charman, residing at Koloa; Mrs. Kathrine Anakalea, at Makaweli, Kauai; Mrs. Elizabeth Taniguchi, at Waimea, Kauai; Miss Rosey Charman, John Charman, in Honolulu, and Mrs. Madeline Dehay of Cloverdale, Sonoma county, California.

Date: 11 Jul 1932

Place: Honolulu, Hawaii

https://www.ancestry.com/mediaui...src=LbJ7&_phstart=successSource

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She is also survived by the widower, 18 grandchildren and three great grandchildren.

WIDELY KNOWN KAUAI WOMAN IS CALLED BY DEATH

Mrs. Sarah Sinclair Charman, well known kamaaina on the islands of Maui and Kauai, died at her home on June 30, the 55th anniversary of her marriage to William Charman of Koloa, Kauai. At the time of her death, she was 68 years and 8 months old.

Mrs. Sarah Sinclair Charman was born in Wailuku, Maui, October 31, 1868. She was the daughter of James and Nakookookuokalani Sinclair. Her father was a tinsmith, known as the first tinsmith in the islands. James Sinclair and family moved to Koloa, Kauai, in 1875. Sarah was educated at the Koloa public school at which time J. K. Burket was principal. She was married to William Charman June 30, 1877, son of Mr. George and Mary Charman of Koloa, Kauai. She had the honor of spending her honeymoon at the home of King Kalakaua, at Kapahi, Kauai.

Mrs. Charman was a cousin of Mrs. Minera Fernandez of Honolulu and Mrs. H. D. Woolley of Salt Lake City. She was a prominent figure with Queen Emma, Queen Kapiolani, Princess Liliuokalani and other aliis. When King Kalakaua was crowned she was an invited guest to his home.

Mr. and Mrs. William Charman were considered on the island of Kauai as among the oldest kamaainas. They both had hosts of friends every where in the territory. She was a lover of flowers and rare plants and spent much time in her garden. She had 16 children of whom nine are living. They are as follows: George Charman, Mrs. Alice Wright, Henry Charman, residing at Koloa; Mrs. Elizabeth Yaniguchi at Waimea, Kauai; Mrs. Katherine Kamali, at Makaweli, Kauai; Miss Rosey Charman, Harry Charman, John Sinclair Charman in Honolulu, and Mrs. Madeline Dehay of Cloverdale, Calif.

She is survived also by the widower, 18 grand children, and 3 great grand children.

CERTIFICATE OF DEATH

STATE OF HAWAII
DEPARTMENT OF HEALTH

CERTIFICATE NO. 151 1932 - 000199

Name of Decedent
SARAH SINCLAIR CHARMAN

Actual or Presumed Date of Death
June 30, 1932

Date of Birth
October 31, 1863

Sex
FEMALE

Race
CAUCASIAN HAWAIIAN

Marital Status
MARRIED

Father's Name
JAMES SINCLAIR

Mother's Name (Prior to First Marriage)
NAPOHU *

Disposition
UNKNOWN

Cause of Death:
a. CHRONIC NEPHRITIS

Part II: CHRONIC ASTHMA

Location: KOLOA

Date of Injury: Unknown

Time of Injury: Unknown

Date Filed by State Registrar: July 5, 1932

OHSM 1.2 (Rev.1/2013) This copy serves as prima facie evidence of the fact of death in any court proceeding. [HRS 338-13(b), 338-19] 823747

ANY ALTERATIONS INVALIDATE THIS CERTIFICATE

This cover sheet is for the certified copies of

Royal Patent: _____

Land Commission Award: _____

Grant: 2944

Total Pages: 3 (Including This Page)

I hereby certify that the foregoing document is a true and correct copy of the document archived on film in the Department of Land and Natural Resources, Kalanimoku Building, 1151 Punchbowl Street, Honolulu, Hawaii.

Dated: Honolulu, Hawaii, this 22ND day of AUGUST, 2023

Registrar, Bureau of Conveyances
Department of Land and Natural Resources

513

No. 2944

ROYAL PATENT.

KAMEHAMEHA V. By the grace of God, King of the Hawaiian Islands, by this His Royal Patent, makes known unto all men, that he has, for himself and his successors in office, this day granted and given, absolutely, in Fee Simple, unto James Mc Buchanan Sinclair and Francis Sinclair as Tenants in Common, for the consideration of

Ten Thousand Dollars paid into the Royal Exchequer, all the whole of the lands now belonging to the Government on the Island of Niihau, it being understood, that under this Patent the whole of the land on the said Island of Niihau is conveyed to the said James Mc Buchanan Sinclair and Francis Sinclair; with the exception of the two lands known as Kahuku and Kaluwaha, set off to Keoakaimoku in the Great Division of 1848, and that piece of land to be to Kapapa, containing fifty acres, which is more particularly described in Royal Patent No. 1618 of Land Titles, which Patent, in the diagram, also describes the pieces of land set apart for Church and School lots; and also excepting and reserving to the Hawaiian Government, all Mineral and Metallic Mines of every description.

To have and to hold the above granted lands in Fee Simple unto the said James Mc Buchanan Sinclair and Francis Sinclair their heirs and assigns for ever as Tenants in Common; subject to the taxes to be from time to time, imposed by the Legislative Council, equally upon all Landed Property held in Fee Simple.

In witness whereof, I have hereunto set my hand and caused the Great Seal of the Hawaiian Islands to be affixed at Honolulu this 23rd day of January A.D. 1864

Kamehameha R.

M. Kekauluohi

By the King and (Kuhina nui)

Pt. Robertson

544

Containing Acres, more or less:
excepting and reserving to the Hawaiian Government, all mineral or metallic Mines of every description.

To have and to hold the above granted Land in Fee Simple, unto the said
Heirs and Assigns forever, subject to the taxes to be from time to
time imposed by the Legislative Council equally, upon all landed Property held in Fee Simple.

In Witness Wherreof, I have hereunto set my Hand, and caused the Great Seal of the Hawaiian Islands to be affixed, at Honolulu, this
day of 18

DEIS Comment Letter 0116

Sharon Goodwin <sharonmokihana@gmail.com> 8/8/2025 5:43 AM

PMRF Draft Environmental Impact Statement Testimony

To info@pmrf-kpgo-eis.com

Dear Ms Ling,

When the Navy's Draft Environmental Assessment in August 2024 proposes the following:

Drone operations from 2 to 45 times annually
Troop maneuvers over land from 1 to 22 times annually
Amphibious operations from 4 to 26 times annually
Helicopter & Osprey landing zone operations from 4 to 26 times annually
Operating, arming and refueling for fighter jets, helicopters, planes & Ospreys from 1 to 20 times annually

my deepest angst and contemplation of the above activities resulting in land, sea, air and water degradations come to mind.
I look upon military activities (maneuvers) as being the most invasive to our environment and have seen how those activities
(maneuvers) culturally limit native peoples and residents of a place by making those places inaccessible or impossible to use.
You have only to look throughout history at places such as Kaho`olawe, Pohakuloa, Red Hill, PMRF, too numerous to name,
to understand my thinking.

Regarding the Navy's proposals above:
I prefer the No Action Alternative,
and would go further to lessen some operations:

Amphibious operations Reduce from 4 to 2 times annually
Helicopter & Osprey landing Reduce from 4 to 0 times annually
Operating, arming and refueling fighter jets, helicopters, planes and Osprey Reduce from 1 to 0 annually

The Osprey has had an extremely poor history of crashing and causing many deaths since its startup in 2007.
Please Retire It For Good ! !

The military must show itself to be capable of cleaning their ordinance---weapons, ammunition, missiles, bombs, grenades,
other explosive devices---and also to insure their safe disposal.

Sharon Goodwin
Kapa`a Homestead, Kaua`i

DEIS Comment Letter 0117

Melodie Aduja <legislativepriorities@gmail.com> 8/8/2025 5:50 AM

Submission of Opposition Testimony – PMRF/KPGO Lease Renewal DEIS

To info@pmrf-kpgo-eis.com Copy Alan Burdick <burdick808@gmail.com> • Melodie Aduja <legislativepriorities@gmail.com>

Subject: Submission of Opposition Testimony – PMRF/KPGO Lease Renewal DEIS

To: To: Naval Facilities Engineering Systems Command, Environmental OPHEV2 Attn: Ms. Kerry Ling, PMRF and KPGO RE EIS Project Manager Email: info@PMRF-KPGO-EIS.com Mail: 400 Marshall Road, Building X-11, Pearl Harbor, HI 96860

From: Alan Burdick, Co-chair, Environmental Caucus, Democratic Party of Hawaii`i Melodie Aduja Co-Chair Emerita, Environmental Caucus, Democratic Party of Hawai‘i

Date: August 7, 2025

Aloha Ms. Ling,

Please find attached my formal opposition testimony regarding the Draft Environmental Impact Statement (DEIS) for the proposed lease renewal of the Pacific Missile Range Facility (PMRF) and the Kekaha Range Facility (KPGO).

This testimony outlines significant legal, environmental, and cultural deficiencies in the DEIS and urges the BLNR to reject it in alignment with recent precedent set by the Board in its rejection of similar military EIS documents for Pōhakuloa, Kahuku, Kawailoa–Poamoho, and Mākua.

Mahalo for your time and consideration. We remain available for any follow-up or clarification.

Me ka ha‘aha‘a,

Melodie Aduja, Co-Chair Emerita, Environmental Caucus, Democratic Party of Hawai‘

- Opposiiton Testimony^J 8-7-2025.pdf (5 MB)

DEIS Comment Letter 0117

Environmental Caucus of The Democratic Party of Hawai‘i

To: Naval Facilities Engineering Systems Command, Environmental OPHEV2
Attn: Ms. Kerry Ling, PMRF and KPGO RE EIS Project Manager
Email: info@PMRF-KPGO-EIS.com
Mail: 400 Marshall Road, Building X-11, Pearl Harbor, HI 96860

From: Alan Burdick, Co-chair, Environmental Caucus, Democratic Party of Hawaii`i
Melodie Aduja Co-Chair Emerita, Environmental Caucus, Democratic Party of Hawai‘i
Elected Member, Red Hill Community Representation Initiative (CRI), 2023 EPA-Navy-DLA Administrative Consent Order as amended

Subject: Formal Opposition to Lease Renewal – Pacific Missile Range Facility (PMRF) and Kōke‘e Park Geophysical Observatory (KPGO), Kaua‘i

Date: August 7, 2025

Purpose: Submission of formal public comment opposing the proposed 30-year lease renewal

Formal Opposition Testimony

I. Lease Scope and Military Rationale

The proposed lease renewal for the Pacific Missile Range Facility (PMRF) and Kōke‘e Park Geophysical Observatory (KPGO) represents a continuation of environmental degradation, cultural desecration, and systemic disregard for the rights and wellbeing of Kānaka Maoli. The Draft Environmental Impact Statement (DEIS), prepared jointly by the U.S. Navy and NASA, fails to meet the standards of comprehensive environmental review required under NEPA and Hawai‘i law. It omits meaningful analysis of climate change, endangered species, cumulative impacts of militarization, and the desecration of sacred sites. These omissions are not merely technical oversights—they are symptomatic of a broader institutional failure to respect the ‘āina and its people.

These omissions are not isolated incidents; they signify a widespread institutional failure to honor the ‘āina and its people. From the bombing and desecration of Kaho‘olawe to the catastrophic fuel contamination at Red Hill (Pu‘uloa), the military has repeatedly demonstrated its inability and unwillingness to act as a responsible steward. The toxic legacy at Pu‘unua Firing Range and the unremediated contamination at Ewa Beach further illustrate this pattern of neglect. These sites are not anomalies—they are precedents.

As noted in the DEIS itself, the agencies seek 30-year leases for over 8,000 acres of Hawaiian land. Yet the document fails to acknowledge the historical and ongoing harm inflicted by military occupation, including contamination, habitat destruction, and cultural erasure. This pattern of neglect echoes previous rejections of military EIS documents, such as those for Pōhakuloa and Army Training Lands on Oʻahu, where the Hawaiʻi Board of Land and Natural Resources found the Army's submissions legally insufficient.

From the bombing and desecration of Kahoʻolawe to the catastrophic fuel contamination at Red Hill (Puʻuloa), the military has repeatedly demonstrated its inability and unwillingness to act as a responsible steward. The toxic legacy at Puʻunua Firing Range, the unremediated contamination at Ewa Beach, and the exclusionary conditions at Kapilina Beach Homes—where residents live beside a beautiful shoreline but cannot fish, crab, swim, or recreate due to its proximity to a military waste dumpsite—further illustrate this pattern of harm. These sites are not anomalies—they are precedents.

The community's response is clear. As @protectmaunakea and @waterprotectorlegal have emphasized, we must demand no new leases, full cleanup and restoration, and the return of ʻāina to Kānaka Maoli. The military is not our neighbor—it is a tenant whose lease has expired, and whose continued presence threatens the ecological and cultural integrity of these islands.

II. The Military Is Not Our Neighbor

As Ethan McKown writes in *The Army Is Not Our Neighbor*, the military is not a co-worker or classmate—it is a tenant, and not a responsible one. It is a tenant whose lease is expired, who poisoned the well, desecrated sacred lands, and now asks for more time with a softened tone and a smile.

This rhetorical shift is manipulative, designed to obscure a long history of environmental destruction, cultural erasure, and institutional impunity. The military occupies vast tracts of land, lives largely segregated from the people it claims to live among, and only emerges to participate in "community" when it needs a permit, a lease, or a bailout.

III. Community Benefits – Illusory and Unenforceable

The Navy and NASA assert that continued operations will:

- Preserve local jobs and income
- Contribute to Kauaʻi's economy
- Maintain conservation management at no cost to the State

Yet these claims lack enforceable guarantees. The original leases were granted for **$1**, and there is no transparency on how future revenues will be reinvested into community programs or environmental restoration. The benefits are rhetorical, not structural.

IV. Cultural Desecration and Environmental Harm

The Draft Environmental Impact Statement (DEIS) fails to assess the full scope of harm. It omits impacts to land, water, ocean ecosystems, endangered species, sacred sites, and the health of our Peoples. There is no meaningful analysis of climate change, and no acknowledgment of the desecration, militarization, and environmental racism these projects continue to impose.

The desecration of iwi kūpuna at Nohili and the construction of the Lua Kupapaʻu O Nohili Crypt are not acts of stewardship—they are monuments to displacement. The DEIS's vague references to community consultation do not reflect the lived reality of exclusion and harm.

This pattern is not unique to Kauaʻi. At Kapilina Beach Homes in West Oʻahu, residents live beside a stunning shoreline—but cannot fish, crab, swim, or recreate in the waters due to its proximity to a military waste dumpsite. The beach is visually pristine but functionally off-limits, a symbol of how military contamination transforms public trust into private hazard. This is not stewardship—it is exclusion masked by aesthetics.

From Kahoʻolawe to Red Hill, Puʻunua Firing Range to Ewa Beach, the military has left behind a legacy of toxic waste, broken promises, and cultural erasure. These sites are not isolated—they are cumulative. They form a pattern of harm that the DEIS refuses to acknowledge, let alone address.

V. Kapilina Beach Homes – Beauty Masking Contamination

Kapilina Beach Homes in West Oʻahu offers a striking example of the military's legacy of exclusion and environmental harm. Nestled along a visually pristine shoreline, the area evokes the image of paradise—yet residents are prohibited from fishing, crabbing, swimming, or engaging in traditional and recreational practices. The reason is chilling: the beach lies adjacent to a military waste dumpsite, rendering the waters unsafe and the land functionally off-limits.

According to Navy regulations and public health advisories, the following activities are prohibited or severely restricted at Kapilina Beach Homes:

- **Fishing**: No longer authorized in the designated Kapilina Beach Homes Fishing Area due to contamination and invasive species. Even in nearby zones, only catch-and-release fishing with pole and line gear is permitted, with a zero bag limit.
- **Crabbing and Shellfish Gathering**: Prohibited due to longstanding advisories from the Hawaiʻi Department of Health warning against consumption of fish and shellfish from Pearl Harbor and adjacent waters.
- **Swimming and Immersion Activities**: Strongly discouraged due to proximity to military waste sites and potential exposure to hazardous pollutants.

- **Ocean Recreation (e.g., kayaking, snorkeling)**: Restricted near the Iroquois Point lagoon and Holokahiki Point, where contamination and invasive species have led to closures.

This is not an isolated case. It is emblematic of how military contamination transforms public trust into private hazard. The shoreline may appear untouched, but beneath its surface lies a toxic legacy of neglect. The community is left with a beach that can be seen but not used, a coastline that invites sunbathing but forbids sustenance, ceremony, or connection.

Kapilina is a microcosm of the broader pattern seen across Hawai‘i—from Kaho‘olawe’s bombed craters to Red Hill’s poisoned aquifer, from Pu‘unua’s toxic soil to Ewa Beach’s unremediated contamination. These are not accidents—they are consequences of a system that prioritizes military expansion over environmental stewardship and cultural respect.

The DEIS fails to acknowledge this reality. It offers no meaningful analysis of how military occupation has severed communities from their ancestral practices, nor does it propose enforceable remediation. Kapilina Beach Homes stands as a warning: even the most beautiful places can be rendered unusable when stewardship is replaced by exploitation.

VI. DEIS Omissions – A Disqualifying Failure of Environmental Review

The Draft Environmental Impact Statement (DEIS) omits critical components that are central to any honest environmental review. It fails to analyze the impacts of RIMPAC exercises—massive multinational war games that disrupt marine life, desecrate sacred waters, and contribute to the militarization of the Pacific. It ignores the widespread contamination from per- and polyfluoroalkyl substances (PFAS), known as “forever chemicals,” which have already poisoned aquifers at Red Hill and threaten ecosystems and human health across Hawai‘i.

The DEIS also neglects to assess marine ecosystem degradation, including coral reef destruction, sonar impacts on marine mammals, and the cumulative effects of decades of weapons testing and fuel spills. These omissions are not minor—they are disqualifying. They violate the spirit and letter of the Ka Pa‘akai framework, which requires agencies to consider the cultural, environmental, and community impacts of proposed actions on Native Hawaiian rights and practices.

Equally troubling is the DEIS’s presentation of the “No Action Alternative.” It is deliberately vague, offering no clarity on how the State would manage the land if the military vacates. This lack of transparency undermines public trust and obscures the real possibility of community-led stewardship, restoration, and cultural reconnection. The absence of a robust alternative reflects a bias toward continued militarization and a refusal to imagine a future beyond occupation.

VII. BLNR Authority and Precedent for Rejecting Inadequate Environmental Impact Statements

The Hawai‘i Board of Land and Natural Resources (BLNR) holds statutory authority under HRS Chapter 343 to approve or reject a Final Environmental Impact Statement (FEIS) for proposed state land dispositions. This authority is not ceremonial—it is a substantive gatekeeping function that ensures environmental, cultural, and community standards are upheld before any lease renewal or land use is granted.

In recent years, the BLNR has exercised this authority to reject multiple military FEIS submissions, including those for:

- **Pōhakuloa Training Area**
- **Kahuku Training Area**
- **Kawailoa–Poamoho Training Area**
- **Mākua Military Reservation**

These rejections were grounded in legal deficiencies, outdated or incomplete biological surveys, failure to meet Ka Pa‘akai standards, and lack of enforceable mitigation or restoration plans. The BLNR’s decisions reflected both community testimony and internal agency review, affirming that environmental stewardship and cultural integrity are non-negotiable.

Given this precedent, the Draft Environmental Impact Statement (DEIS) for the PMRF/KPGO lease renewal must be similarly rejected. It fails to:

- **Analyze cumulative impacts from RIMPAC and other joint-force exercises**
- **Address PFAS contamination and marine degradation**
- **Provide a credible pathway for restoration or community-led stewardship**
- **Meet the constitutional and statutory requirements for cultural impact assessment**

The BLNR must not abdicate its responsibility by accepting a deficient DEIS or FEIS. To do so would undermine its own precedent and erode public trust in the environmental review process.

VIII. Conclusion

The rejection of the PMRF/KPGO DEIS is not merely a procedural necessity—it is a moral and legal imperative. The BLNR has already demonstrated its willingness to uphold environmental law and cultural integrity by rejecting similarly deficient military EIS documents. To accept this DEIS would be to ignore precedent, betray public trust, and perpetuate harm to the ‘āina and its people.

We call upon the BLNR to act decisively: reject the DEIS, deny the lease renewal, and initiate a process for cleanup, restoration, and return of lands to Kānaka Maoli stewardship. The

military is not our neighbor—it is a tenant whose lease has expired. The time for accountability is now.

Respectfully submitted,

/s/ *Alan B. Burdick*

Alan B. Burdick
Co-chair, Environmental Caucus, Democratic Party of Hawaii
Email: burdick808@gmail.com

/s/ *Melodie Aduja*

Melodie Aduja
Co-Chair Emerita, Environmental Caucus, Democratic Party of Hawai‘I
Elected Member, Community Representation Initiative (CRI), 2023 EPA – Navy – DLA Consent Order as amended
Email: melodie.cri.org@gmail.com

Citations:

1. U.S. Navy and NASA. *Draft Environmental Impact Statement for Pacific Missile Range Facility and Kōke‘e Park Geophysical Observatory Lease Renewal*. July 2025. Available at pmrf-kpgo-eis.com/comments
2. Ethan McKown. *The Army Is Not Our Neighbor*. August 3, 2025. Substack article
3. protectmaunakea (Instagram). Repost from @waterprotectorlegal. August 6, 2025. Instagram post

DEIS Comment Letter 0118

Tia Marie <tiamasaniai@gmail.com> 8/8/2025 5:59 AM

Point of Order regarding U.S. Navy's 2025 Draft EIS for Kauai Pacific Missile Range Facility

To info@pmrf-kpgo-eis.com

To whom it may concern,

Please respond to acknowledge you have received this email.

E ʻIʻo Oki Hewa Oki Lepo Oki Pilikia Oki Maʻi Oki Makemake Waiwai
E ʻIʻo Oki Hewa Oki Leop Oki Pilikia Oki Maʻi Oki Makemake Waiwai
E ʻIʻo Oki Hewa Oki Leop Oki Pilikia Oki Maʻi Oki Makemake Waiwai

POINT OF ORDER

Regarding the Draft Environmental Impact Statement (DEIS) for the Proposed U.S. Navy and NASA Land Retention at the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO), Kauaʻi
Submitted on behalf of Hawaiʻi Peace & Justice and in solidarity with lineal descendants and cultural practitioners who stand in pono
Date: August 7, 2025

I. INTRODUCTION

This Point of Order is entered into the public and administrative record to document substantial legal, cultural, environmental, and ethical deficiencies within the Draft Environmental Impact Statement (DEIS) submitted by the U.S. Navy and NASA on June 20, 2025.

Our purpose is not to "reject" this DEIS—because this is a draft, the point is to expose gaps, errors, omissions, and contradictions so large they cannot be remedied without substantial new study, consultation, and disclosure.

We raise specific, lawful, and necessary questions that remain unanswered and that must be addressed before any Final EIS can be lawfully or ethically considered.

II. TRUST LAND STATUS AND FIDUCIARY DUTIES

The lands in question are **Crown and Government Lands of the Hawaiian Kingdom**, held under the public trust created by the Statehood Admission Act §5(f) and Article XI of the Hawaiʻi State Constitution.

- **Native Hawaiians are legal beneficiaries** of this trust.
- The State of Hawaiʻi is a **trustee**, not an absolute owner, and cannot alienate or lease trust lands in a way that undermines their trust purpose.

Questions for the Record:

1. Has the State or Navy obtained a formal legal opinion assessing whether **Alternative #2**—continuing and expanding military retention—constitutes a breach of fiduciary duty?
2. Has any Ka Paʻakai cultural impact analysis concluded that this proposed use aligns with the constitutional and statutory purposes of the trust?
3. If Alternative #2 changes the character of the land or its uses in ways inconsistent with trust purposes, how will damages to beneficiaries be calculated and compensated?

III. CULTURAL AND ENVIRONMENTAL DEFICIENCIES

The DEIS fails to meet the **Ka Paʻakai o ka ʻĀina** framework under Hawaiʻi law and misrepresents Hawaiian culture as static "archaeological resources" rather than a living, ongoing practice.

DEIS Comment Letter 0118

Key Questions:

- Were ethnographic interviews conducted with lineal descendants regarding **leina a ka 'uhane** and **iwi kūpuna**?
- Has the Navy analyzed how surveillance, weapons testing, and access restrictions impact cultural practices such as kilo, lawai'a, and pule?
- Where is the pa'akai analysis identifying potential impairment of customary and traditional Native Hawaiian rights under Article XII, Section 7 of the Hawai'i Constitution?

IV. ENVIRONMENTAL HAZARDS & CLIMATE RISKS

The DEIS omits critical environmental hazard assessments:

- **PFAS contamination** from firefighting foam (notably after the C-130 fire event at PMRF)
- **Perchlorate contamination** from rocket propellants
- Impacts of **underground fuel storage tanks** on aquifers and muliwai ecosystems

Climate Risk Gaps:

- No integration of **Hawai'i Climate Commission sea level rise projections**
- No modeling of storm surge and coastal erosion impacts on PMRF's shoreline facilities
- No adaptation or retreat planning for risks through 2100

V. WEAPONS TESTING & GLOBAL IMPACTS

The DEIS is silent on the fact that PMRF is one of the largest military test ranges in the world, with a 60-year history of testing weapons systems that have been deployed globally—often in conflicts where human rights violations have been documented.

Systems Tested at PMRF Include:

- **Ballistic Missiles**: Minuteman III (ICBM), Trident II D5 (SLBM), Polaris (SLBM), Peacekeeper ICBM
- **Missile Defense**: Aegis BMD (SM-3, SM-6), THAAD interceptors, GMD
- **Cruise Missiles**: Tomahawk LACM, Harpoon, Maverick
- **Precision-Guided Munitions**: JDAM, GBU-39 Small Diameter Bomb, Laser-Guided Bombs
- **Anti-Satellite Systems**: Early ASAT tests with NASA & U.S. Space Force
- **Directed Energy & Hypersonics**: High-power lasers, microwave weapons, and boost-glide vehicles

Global Harm Linkages:

- **Amnesty International** and **Human Rights Watch** have documented the use of U.S.-made weapons in Gaza, Yemen, Iraq, and Syria, including missile and aerial strike systems of the types tested at PMRF.
- The DEIS contains no ethical or humanitarian review of these connections, nor any acknowledgment that Hawaiian lands are being used to enable warfare that harms Indigenous peoples and civilian populations abroad.

VI. SANDIA NATIONAL LABORATORIES & LOCKHEED MARTIN: LEGAL AND ETHICAL RECORD

Sandia National Laboratories operates at PMRF and is managed by **Sandia Corporation**, a wholly owned subsidiary of Lockheed Martin until 2017.

Documented Misconduct Includes:

1. **2007 Whistleblower Retaliation** – New Mexico State Court awarded $4.7 million to Shawn Carpenter, a Sandia network security analyst fired after reporting massive security breaches involving hundreds of military

DEIS Comment Letter 0118

and defense contractor networks, including sensitive Lockheed Martin data (Wikipedia, citing court records).

2. **2014–2015 DOJ Settlement** – Sandia Corporation paid $4.7 million to resolve allegations it used federal funds to lobby for renewal of its $2 billion contract to operate Sandia National Labs (U.S. DOJ Press Release, Dec. 2015).
3. **DOE Inspector General Report IG-0927** – Found that Sandia improperly charged the government for lobbying activities, violating federal law and contractual terms.
4. **Lockheed Martin Lawsuits** – Lockheed, Sandia's former parent, has faced numerous lawsuits over employment discrimination, environmental contamination, and breach of contract, raising serious credibility and public trust concerns.

Questions for the Record:

- How can the DEIS be deemed credible when a principal contractor operating at PMRF has a documented record of misusing federal funds, retaliating against whistleblowers, and violating ethical standards?
- What safeguards ensure that similar misconduct is not occurring in the context of PMRF operations today?

VII. DEMAND FOR REMEDY

Based on the deficiencies and evidence above, we call for:

1. **Full independent legal review** of Alternative #2 for compliance with trust law and fiduciary duty.
2. **Comprehensive environmental hazard and contamination testing** (PFAS, perchlorate, fuel storage leaks) with public disclosure.
3. **Complete Ka Pa'akai cultural impact analysis** before any Final EIS consideration.
4. **Disclosure of all weapons systems tested at PMRF in the past 20 years** and their subsequent deployment records.
5. **Independent oversight** of all contractors at PMRF with histories of legal or ethical violations.

SOURCES CITED

- U.S. Department of Justice, "Sandia Corporation Agrees to Pay $4.7 Million to Resolve Allegations Related to Lobbying Activities" (Dec. 23, 2015)
- U.S. Department of Energy, Office of Inspector General, Report No. IG-0927 (Nov. 2014)
- Wikipedia, "Sandia National Laboratories – Legal Issues" (accessed Aug. 2025)
- Amnesty International, "Israel/OPT: Evidence of U.S.-Made Weapons Used in Gaza" (various reports 2014–2024)
- Human Rights Watch, "U.S. Weapons in Civilian Attacks in Yemen and Gaza" (various reports 2015–2024)

Tia Marie Namahana Masaniai-Estrera
Mo'opuna o Manokalanipo a me Ko Hawai'i Pae 'Āina

DEIS Comment Letter 0119

Davis Price <daprice80@gmail.com> 8/8/2025 5:59 AM

PMRF - EIS Comments - Davis Price on Behalf of Kumano I Ke Ala

To info@pmrf-kpgo-eis.com

Public Comment Submitted by Kumano I Ke Ala Co-Founder of Kumano I Ke Ala, a NHO Based in Waimea, HI.

The U.S. Navy and NASA are seeking new 30-year leases for over 8,000 acres of stolen Hawaiian lands on Kauaʻi, lands they've occupied for decades at the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO).

Military land leases in Hawaiʻi, particularly at the Pacific Missile Range Facility (PMRF) on Kauaʻi, have been a focal point of environmental and cultural concerns. The U.S. Navy and NASA currently lease approximately 8,172 acres of state land on Kauaʻi, with leases set to expire between 2027 and 2030. These leases encompass areas such as the Main Base, Kamokalā Ridge, Mānā Water Well, Miloliʻi Ridge, and Mākaha Ridge .

Environmental and Cultural Concerns

- **Wetland Shrinkage**: The operation of pump stations at PMRF has led to the reduction of wetlands that once supported some of the largest known native waterbird populations in Hawaiʻi .Aloha State Daily
- **Marine Ecosystem Impact**: Residents have expressed concerns about the facility's impact on the Kaulakahi Channel between Kauaʻi and Niʻihau, highlighting potential disturbances to marine ecosystems .Aloha State Daily
- **Per- and Polyfluoroalkyl Substances (PFAS)**: The use of aqueous film-forming foam (AFFF) at PMRF has introduced PFAS, known as "forever chemicals," into the environment. While the Navy asserts that no human health drinking water exposure pathway has been identified, the long-term environmental implications remain a concern .Kauai Now
- **Cultural Desecration**: Many Native Hawaiians view the Navy's presence on lands that were never ceded to the U.S. as a form of cultural desecration. Testimonies have highlighted the disturbance of ancestral remains and the loss of access to traditional gathering sites .Kauai Now

Public Engagement and Response

- In 2025, the Navy and NASA released a Draft Environmental Impact Statement (EIS) to evaluate the potential environmental impacts of the proposed lease renewals. Public meetings held in Līhuʻe, Kekaha, and Kapaʻa saw strong community participation. Residents voiced concerns about the adequacy of the EIS, particularly its analysis of marine ecosystems and groundwater. Many also criticized the exclusion of the Rim of the Pacific (RIMPAC) exercises from the assessment .PMRF & KPGO EIS+11Maui Now+11Kauai Now+11Kauai Now

Economic and Strategic Considerations

- PMRF is a significant contributor to the local economy, with approximately 900 personnel, most of whom are civilians from the local community. However, we as the community need

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transparency as to how many multi-genrational residents benefit from job creation by PMRF.

- We call on the US Navy and the many contractors that benefit from the use of these Hawaiian Kingdom lands to support the economic diversification of surrounding coommunities including Kekaha and Waimea by investing in the development of agricultural businesses a Native hawaiian owned businesses

The Draft EIS fails to account for the full scope of harm to ʻāina (land and waters), including:

- Ongoing damage to land, water, and ocean ecosystems
- Threats to endangered species and valued cultural sites and historic properties
- Lack of analysis on climate change impacts
- DEIS does not adequately address impacts on long-term community health
  - Continued desecration and occupation of Kānaka Maoli lands without return, reparations, or restoration

Proposed Action: The Navy proposes to retain the use of 8,172 acres of state lands on Kauaʻi in support of continued and ongoing military training and testing at PMRF. NASA proposes to retain the use of 23 acres of state lands on Kauaʻi in support of maintaining data collection efforts of global significance at KPGO. The Proposed Action includes current operations that occur on leasehold and easement lands. This action would require both the Navy and NASA to succeed these agreements at fair market value.

What Are the Alternatives?

- **Alternative 1:** The Navy and NASA would apply to BLNR for new long-term real estate agreement in the same manner as required by BLNR and for the same uses as the current leases and easements.
- **Alternative 2:** The Navy and NASA would pursue fee simple acquisition of up to 700 acres (684–Navy, 16–NASA) of leaseholds, and otherwise obtain use of the remaining acreage as described in Alternative 1
- **No Action Alternative:** The State of Hawaiʻi would not issue the Navy and NASA any real estate agreements for the state lands on Kauaʻi after expiration of the leases and easements between 2027 to 2030. The current real estate agreements for 8,172 acres with the Navy and 23 acres with NASA would expire. Existing infrastructure on Navy and NASA leasehold and easement lands could be removed or remain in place as determined by negotiations between the parties pursuant to the existing real estate agreements.

Analysis of DEIS: Lack of Transparency and Unaddressed Impacts

The DEIS leans in favor of continuing the leases, suggesting that the benefits of military retention outweigh the negatives. A truly comprehensive EIS should allow that conclusion to be drawn only after fully analyzing the benefits of No Action.

Lack of Free, Prior and Informed Consent

Although Native Hawaiian Organizations qualify as “consulting parties” in NEPA and NHPA process, the DEIS is silent on the right to free, prior, and informed consent or the Hawaiian sovereignty

DEIS Comment Letter 0119

movement's call for the return of military-controlled lands.

Although the DEIS states the Navy has contacted Hawaiian lineal descendants to carry out a Ka Pa'akai analysis, a process that government agencies must follow to avoid impinging on Native Hawaiian traditional and customary rights, greater transparency with the community is needed.

Impact on Cultural Resources and Practices

- Although "cultural practices" is a listed resource, the DEIS never analyzes how 24/7 security zones, radar emissions, or restricted access hinder lā'au lapa'au gathering, fishpond restoration, or iwi kūpuna repatriation.
- The DEIS has not equally analyzed the harms of Alternative 1 and the benefits of No Action and briefly notes the perceived injustice of ongoing federal control of Native lands, but it ultimately labels cultural effects of Alternative 1 "not significant." The DEIS diminishes the significance of full access by Native Hawaiians to manage their ancestral lands and resulting harm of access restriction.
- Although the DEIS states no new restrictions on access to land and resources will be imposed, there is vague language about when closures and restrictions will occur and is specifically couched in "expectations" and does not point to clarity or actual knowledge of what those restrictions would be as they pertain to the Kamokalā Ridge and locations where cultural practices, resources, and wahi pana. P. 3-53 DEIS.
- The DEIS does not address how traditional cultural practices of fishing and hunting or gathering are affected. Many area residents have also expressed a desire to use the beaches and coastlines around the base that are currently off-limits.

Environment and Climate Change Adverse Impacts

- The DEIS is silent on the impact of disproportionate noise, contamination, or climate hazards borne by nearby families.
- Noise, biodiversity, and water all intersect with Native Hawaiian cultural practice, yet the analysis does not address or incorporate 'āina-based Indigenous ecological knowledge beyond generic references to consultation.
- The DEIS does not address how continued operations might need to adapt to challenges stemming from climate change (ie. stronger storms, rising sea levels impacting land or PFAS), nor the risk that continued occupation could delay ecosystem adaptation.
- Local residents have expressed concern that the DEIS also fails to account for cumulative adverse impacts after decades of water diversion, rocket launching, wargames, access restrictions, and development expansion.
- The DEIS does not sufficiently address PMRF's long-term impacts on marine ecosystems.
- The DEIS does not address the PMRF's impact on the Kaulakahi Channel between Kaua'i and Ni'ihau.

DEIS Lacks Analysis of Impacts on Public Health and Safety

- The DEIS notes that if leases end, there would need to be "complex negotiations" to transfer environmental responsibilities and that "mitigation measures for the No Action Alternative would occur at a later time; therefore, these measures are not included herein."
- The DEIS does not presently outline how the Navy would clean up or make safe the lands before returning them.

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We call on the US Navy, Dept of Defense, and State of Hawai'i, to menaingfully engage with the Native Hawaiian Community, ensuring that historical injustices are accounted for in future lease agreements.

- Public Comment Submitted by Kumano I Ke Ala Co.docx (27 KB)

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We call on the US Navy, Dept of Defense, and State of Hawai‘i, to menaingfully engage with the Native Hawaiian Community, ensuring that historical injustices are accounted for in future lease agreements.

DEIS Comment Letter 0120

PMRF-1195 (Record 9 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name M	**Last Name** MH	**Mailing List** Yes	
Street Edmunds St	**City** Seattle	**State** WA	**Zip** (none)
Email paopufruitshakes@gmail.com		**Organization**	
Attachments (none)			
Comments No new leases and accountability for enviornmental and cultural harm. Calling for comprehensive cleanpu and restoration, returning aina to Kanaka Maoli, the original stewards of this land. Endangered species, sacred sites are in danger with long-term health consequences for living communities; this analysis further omitted any climate change analysis which is irresponsible to our future and present people and land. Continued desecration and occupation of Native Hawaiian lands is wrong.			

DEIS Comment Letter 0121

PMRF-1196 (Record 8 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Kelsey	**Last Name** Amos	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments These lands belong to the Hawaiian people and should not be owned, leased or managed by the US military or the federal government. thank you, Kelsey			

DEIS Comment Letter 0122

PMRF-1197 (Record 7 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Kamakana	**Last Name** Ferreira	**Mailing List** Yes	
Street 560 N Nimitz Hwy	**City** Honolulu	**State** HI	**Zip** (none)
Email kamakanaf@oha.org		**Organization** Office of Hawaiian Affairs	
Attachments Yes • File Attachment: letter_08.07.25__oha_comment_on_deis_for_pmrf_real_estate_renewal__kauai.pdf			
Comments See attached letter with OHA comments.			

DEIS Comment Letter 0122

PHONE (808) 594-1888 FAX (808) 594-1938

STATE OF HAWAIʻI
OFFICE OF HAWAIIAN AFFAIRS
560 N. NIMITZ HWY., SUITE 200
HONOLULU, HAWAIʻI 96817

August 7, 2025

Naval Facilities Engineering Systems Command
Environmental OPHEV2
Attn: PMRF and KPGO EIS Project Manager, Ms. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor, Hawai‘i 96860

Re: Draft Environmental Impact Statement, Pacific Missile Range Facility and Kōkeʻe Park Geophysical Real Estate EIS, Waimea Ahupuaʻa, Kona Moku, Kauaʻi Mokupuni; Tax Map Key: (4) 1-2-001:006 (por.), 010; (4) 1-2-002:001 (por.), 010, 024 (por.), 025, 026, 027, 028, 029; (4) 1-2-016:011; (4) 1-4-001:002 (por.), 013 (por.), 014 (por.).

Aloha e Ms. Ling:

The Office of Hawaiian Affairs (OHA) is in receipt of the June 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kauaʻi. The Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) published this DEIS for public comment as required by the Hawai‘i Environmental Policy Act (HEPA), Hawai‘i Revised Statutes (HRS) Chapter 343 and the National Environmental Protection Act (NEPA), 42 U.S.C.A. § 4321 *et seq*. As detailed in the DEIS, existing real estate agreements are set to expire between 2027 and 2030, and the DON is proposing to retain the use of 8,172 acres of State lands to support continued military training, testing, and facility operations at PMRF and Kaʻula Island. NASA also proposes to retain the use of 23 acres of State lands at Kokeʻe in support of continued operations, including measurements of the Earth’s rotation and local land motion at KPGO.

Established pursuant to the terms of Section 5 of the Admissions Act, Pub. L. No. 86–3, 73 Stat. 4, 6 (1959), and Article XII, sections 4, 5, and 6 of the Hawai‘i State Constitution, OHA serves as a semiautonomous agency and trust vehicle for the betterment of the conditions of native Hawaiians and Hawaiians. OHA’s nine elected trustees exercise their powers “to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiians, including all income and proceeds from that pro rata portion of

the [public lands] trust."[1] By statute, OHA is mandated to: (1) serve as principal public agency in the State of Hawai'i responsible for the performance, development and coordination of programs and activities relating to native Hawaiians and Hawaiians; (2) assess the policies and practices of other agencies impacting native Hawaiians and Hawaiians; and (3) conduct advocacy efforts for native Hawaiians and Hawaiians.[2]

Consistent with its constitutional and statutory duties to advocate for Native Hawaiians and Hawaiians, and preservation of the public land trust corpus, OHA respectfully provides the following comments for the DON's and NASA's consideration in fulfilling their legal duties under HEPA and NEPA:

Public Land Trust Considerations

The DON's current real estate agreements with the Department of Land and Natural Resources (DLNR) include 684 acres of leasehold lands and 7,664 acres of easement lands, for a total of 8,348 acres on the island of Kaua'i. Current leases and easements are used for passive encroachment buffers, as well as for mission readiness, access, and utilities at the following five general locations: Main Base, Kamokalā Ridge, Mānā Water Well, Miloli'i Ridge, and Mākaha Ridge. NASA's current real estate agreements with DLNR include 16 acres of leaseholds and 7 acres of easement lands, for a total of 23 acres. All of these lands are former crown and government lands of the Hawaiian Kingdom. *See* DEIS at 3-92.

OHA has a paramount interest in preserving the corpus of the former crown and government lands of the Hawaiian kingdom until a resolution of the Native Hawaiian people's unrelinquished claims to these lands, including sovereignty and governance over a land base. The state and federal governments have repeatedly recognized the obligation to preserve and protect the State's public land trust as "the foundation (or starting point) for reconciliation" with the Native Hawaiian people for historic wrongs.[3]

> [T]he Apology Resolution and . . . related state legislation clearly contemplate that native Hawaiians (1) "never directly relinquished their claims to... their national lands to the United States," and (2) "are determined to preserve, develop and transmit to future generations their ancestral territory." As such, we believe and, therefore, hold that the Apology Resolution and related state legislation… give rise to the State's fiduciary duty to preserve the corpus of the public lands trust, specifically, the ceded lands, until such time as the unrelinquished claims of the native Hawaiians have been resolved. Such duty is consistent with the State's

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[1] Haw. Const. Art. XII, § 6.

[2] HRS § 10-3.

[3] *Office of Hawaiian Affairs. v. Hous. & Cmty. Dev. Corp.*, 177 P.3d 884, 902 (Haw. 2008), *rev'd and remanded sub nom. Hawai'i v. Office of Hawaiian Affairs*, 556 U.S. 163 (2009) (reversed on other grounds).

> "obligation to use reasonable skill and care" in managing the public lands trust and the Ahuna court's declaration that the State's conduct "should... be judged by the most exacting fiduciary standards."

Id. at 905 (internal citations omitted)

Given OHA's vested interest in the public lands trust and fiduciary duties to our beneficiaries, OHA's June 7, 2024, comment letter on the EISPN, requested that OHA be consulted as part of the lease renewal process along with representatives for the State of Hawai'i. While the DEIS itself is not responsive to this request, we understand from the July 24, 2025, discussion between the OHA Board of Trustees and representatives from the DON and NASA that OHA can expect a formal response to our request for consultation in the near future. We respectfully request that the DON and NASA share this response in the FEIS as part of the records of communications relevant to lease renewal. We further recommend that Section 3.5 include a summary of OHA's public land trust responsibilities and oversight role.

An additional issue of paramount concern to OHA given our constitutional role and duties, as stated in our June 7, 2024, letter, is the status of cleanup and monitoring activities at PMRF given the known harm that military activities can cause. An essential component of the State's duty to protect and preserve trust land is an obligation to reasonably monitor a third party's use of the property.[4] It is unclear, however, whether the State has been actively conducting periodic monitoring and site visits of the lease areas, as necessary to preserve the public lands trust for eventual return to the State of Hawai'i or the Native Hawaiian people. Consistent with this duty, the State should not entertain lease renewal prior to completing an independent assessment of the DON and Navy's compliance with existing lease terms, including those related to cleanup.[5]

Unfortunately, the DEIS does not include any information on periodic monitoring done by the State or whether such monitoring has occurred. Rather, in response to our comment, the DEIS states that "solicitation of past DLNR monitoring and inspection records at PMRF should be made directly to the DLNR." Again, we recommend the DEIS: (1) disclose whether the State has conducted any inspections to date; and (2) disclose any concerns noted by the State as a result of such independent inspection or inspections. The public, in turn, would then be informed and able to comment via the HEPA process on the State's compliance with its mandatory trust duties and how any identified problems are being addressed and remedied.

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[4] *See Ching v. Case,* 145 Haw. 148, 176-77, 449 P.3d 1146, 1174-75 (2019).

[5] While Ka'ula Island or Ka'ula Rock was formally transferred to the federal government in 1924, surrounding state waters and lands have been impacted by bombing over the years and should be part of State investigation into the condition of public lands.

Lease Alternatives

In OHA's June 7, 2024, comment letter on the EISPN, we recommended that the DEIS include a meaningful analysis of a shorter-term lease option. OHA believes a shorter-term lease option is a viable option that the DON is obligated to consider pursuant to NEPA, specifically a lease term that is more than 25 years but significantly less than 65 years (e.g., 30 years). A shorter-term lease option would allow the State to evaluate the progress of the lease and to see if conditions are being met before agreeing to any longer lease extension, and thus is more consistent with its duties as articulated in *Ching v. Case.*

In review of the DEIS Alternative 1, it appears the DON is still pursuing a long-term option, with "long term" use defined as anything greater than 25 years. However, the DEIS also states it is seeking a new long-term lease for a "similar duration" of time to the existing lease. DEIS at 2-8. Thus, we assume a 65-year lease term is being sought even though this is not explicitly stated in the alternative description. OHA advises that Section 2.3.1 of the DEIS should explicitly quantify what lease term is being pursued, as readers could interpret Alternative 1 to include a lease term as low as 26 years. Moreover, and more importantly, the DON should provide a systematic explanation as to its rationale for dismissing shorter lease terms from further analysis, for example 26 or 30 years.

Under Alternative 2, "Fee Simple Acquisition of Current Real Estate Agreements for Leaseholds," the DON is proposing to pursue fee simple acquisition of up to 700 acres of state lands. While OHA is opposed to alienation of the ceded lands base whether through long-term lease or fee simple acquisition, OHA notes that retention of state lands, if pursued, must involve more than simply a "fair market value" evaluation, which refers to monetary valuation of the affected lands. Rather, any retention must include mitigating measures appropriate to the level of harm including, but not limited to, for example, a long-term community benefits package for Native Hawaiians including a commitment to assist with governance initiatives, and definitive commitments for long-term restoration activities. Thus, OHA recommends including further detail in Section 2.3.2 of the DEIS regarding the process that will be pursued for this alternative (i.e., timeline, state compliance, land value assessment), and process for community consultation regarding an appropriate land valuation process.

Historic Preservation Compliance Coordination

In OHA's June 7, 2024, comment letter on the EISPN, we recommended coordination of federal (NHPA Section 106) and state (HRS Chapter 6E) historic preservation review processes with the environmental review process as these processes are essential to identifying historic properties and generating mitigation commitments. In review of the current DEIS, we do see that consultation with SHPD is already ongoing for HRS 6E compliance and that PMRF is operating under a 2012 Programmatic Agreement for NHPA Section 106 compliance that was recently updated in 2024. Further, PMRF has

taken the approach to evaluate historic properties as traditional cultural places (TCP) as part of Section 106 considerations where appropriate to ensure a more holistic approach is applied to understanding cultural resources at the installation. Typically, a TCP designation involves consultation with cultural practitioners since it is a property that is significant to a living community because of its association with a community's traditional beliefs, customs, and practices.[6]

For state level compliance, the DEIS makes clear that all areas within active leaseholds and easements for utilities and roadways have already been surveyed for archaeological and architectural resources. Figure 3.2-1 provides a map of where surveys took place over the leasehold and easement areas. The most recent archaeological inventory survey (AIS) occurred in 2024 specifically in support of the EIS. As part of the 2024 AIS, eight new sites were identified that were determined to be significant under Criterion D and E. Additionally, the Nohili Dune site, which qualifies as a TCP, has also been found to be significant under Criterion A and E. OHA notes that prior to submitting these significance determinations to SHPD, the Hawai'i Administrative Rules (HAR) 13-275-6(c) require consultation with OHA and Native Hawaiians that may find the site important for Criterion E sites. Thus, as the HRS 6E and TCP processes proceed, OHA looks forward to participating in consultation.

As part of the Final EIS, OHA recommends providing a clear timetable for HRS 6E completion (inclusive of tentative consultation and HAR 13-275-6 requirements) and a summary of guidance or comments provided by SHPD so far in Section 3.2 of the DEIS. On the federal side, OHA recommends that updates be provided on the designation of the Nohili Dune site as a TCP and what additional actions (i.e., boundary adjustments, National Register updates, access) and consultations are expected to occur as part of this TCP designation.

Cultural Impact Assessment (CIA)

A CIA was prepared for this project by International Archaeology, LLC, in October 2024. A total of 13 people were interviewed as part of the CIA. Most of the concerns presented pertained to access, including requests to open up camping to local families, and to provide access for surfing, fishing, and shoreline activities. Some informants did note the presence of iwi kūpuna as well. To address access, the CIA proposed use of a Morale, Welfare, and Recreation (MWR) Guest Card and coordination with cultural resource management program for cultural access.

OHA notes that while the DEIS discusses access for cultural practices, it does not discuss the CIA recommendation for use of a MWR Guest Card. The DEIS only mentions

[6] See National Park Service National Register Bulletin titled "Identifying, Evaluating, and Documenting Traditional Cultural Places", December 5, 2024: https://parkplanning.nps.gov/showFile.cfm?sfid=769780&projectID=107663

that an MWR Guest Card Program began in 2005, but does not discuss the program in context of recent CIA suggestions or whether the program has been effective in meeting the community's access needs.

The CIA further indicates that the PMRF Integrated Cultural Resources Management Plan (ICRMP) Standard Operating Procedure (SOP) #16 is the guide for coordinating cultural related access, and that access to TCPs are also pending preparation of a TCP study for TCP sites (i.e., Nohili Dunes). Per Table ES-3, the DEIS states that PMRF is intending to streamline access through development of a PMRF Access Management Plan. The relevant SOP is not quoted in the DEIS to provide additional clarity on the existing access program, nor is any timetable or discussion provided on the proposed PMRF Access Management Plan. Aside from PMRF, access to KPGO is only discussed in a single sentence with a statement that reads "requests for access are made via phone or email to the KPGO Site Manager."

While OHA understands that managed access is necessary given the national security interests at stake, OHA supports maximizing public access to the extent feasible and consistent with national security needs. We therefore recommend that Section 3.3.1.4.3 of the DEIS expand its discussion on access to include:

1. the current SOP language that governs access;
2. a timeline for developing access programs for TCPs;
3. a timeline for developing the larger PMRF Access Management Plan;
4. a discussion on the efficacy of the MWR Guest Card Program in light of recent suggestions made in the 2024 CIA, with consideration of a valid Hawai'i driver's license as an alternative identification method to the MWR card; and
5. a feedback process to gauge whether the access program for cultural practitioners is sufficient to meet community needs and interests in accessing significant cultural sites within the PMRF footprint (both state and federal lands).

The latter feedback process is suggested here as it seems based on the 2024 CIA that there are still access concerns. In regards to KPGO access, we recommend development of an actual SOP for consistency with the access process for PMRF.

Acreage Covered

Per the May 2024 Environmental Impact Statement Preparation Notice (EISPN) for this real estate renewal, the DON initially applied for real estate agreements for 8,348 acres in leasehold areas and easements. However, the DEIS is seeking 8,172 acres total (176 acres less) without any clear explanation for the difference from the EISPN. The difference in acreage is also apparent within the DEIS itself as the DEIS's supporting studies (i.e., cultural impact assessment) contained in the appendices still notate 8,348 acres. The

difference appears to be in the amount of easement lands for Kamokalā Ridge, with the DEIS claiming only 179 acres versus 355 acres in the EISPN. Appendix D of the DEIS omits a "restrictive use" easement (ESQD Easement S5604) of Kamokalā Ridge from the EISPN totaling 176.371 acres.

OHA also notes that there are differences in the Tax Map Key (TMK) numbers in the EISPN and the DEIS (i.e., TMK (4)1-2-002:012, 013, 015). Notation of such changes and explanations are typically provided so the public can understand differences or revisions in scope as the HRS 343 process proceeds. Thus, OHA recommends an explanation be provided for the change in acreage and Tax Map Keys (TMKs) between the DEIS and EISPN. More importantly, if there is in fact a reduction in acreage (i.e., easement S5604), then the DEIS should explain how those lands will be restored (if being returned to the state) or what their disposition is.

Additionally, it appears to OHA that the requested total acreage amount is being rounded to the nearest whole number in the DEIS. It's clear from Table 1-3 and Appendix D that the actual acreage extends out two to three decimal places, totaling 8,171.516 for PMRF and 22.900 for KPGO. This is a little over half an acre (.584) less than what is being presented for real estate renewal. OHA recommends that the requested leasehold amount be as accurate as possible within the DEIS, unless there is an explanation for any inconsistencies (i.e., if the DON is rounding down for the total acreage requested). Again, if there is any reduction in acreage from what is currently being leased, then the EIS must explain how those lands will be restored (if being returned to the state) or what their disposition is.

Biological Resources

In OHA's June 7, 2024, comment letter on the EISPN, we recommended early consultation with the United States Fish & Wildlife Service (FWS) and the Division of Forestry and Wildlife (DOFAW) as these entities can offer guidance on federal and state level compliance, respectively. We further emphasized the importance of consultation with cultural practitioners as part of biological surveys and any related conservation actions.

On the federal side, the DEIS demonstrates that the DON has been in consultation with the FWS, with the most recent Biological Opinion being issued in 2025. On the state side, the DEIS reports that there is regular coordination with DOFAW personnel on invasive and protected species response efforts, and emerging landscape-scale issues. However, the discussion on page 3-60 regarding DOFAW is quite short and very general. While OHA does appreciate that the DEIS discusses the ongoing work with DOFAW, the DEIS could better elaborate on these consultations with a summary of provided advice and active collaborations in Section 3.4.1.1.4.

OHA observes on the PMRF website (https://pmrfkauai.com/Natural-and-Cultural-Resources) that PMRF is actively engaged with community partners as part of cleanup

efforts and stewardship actions. This is not elaborated upon in Section 3.4 of the DEIS. Some of these activities were explained to OHA when we did a site visit of the installation on March 21, 2025, with PMRF leadership and cultural resources staff. Partnerships with DOFAW were specifically mentioned as an important part of active conservation work. OHA recommends that these community activities as they relate to biological resources be better elaborated upon in Section 3.4 of the DEIS so the public is aware of these programs and all activities occurring on state lands.

Moreover, while the region of influence (ROI) analyzed in the DEIS is limited to the state lands currently leased by the DON and NASA in support of their respective activities, these lands are of course integral and important for continued operational success. Therefore, while military activities are currently undergoing concurrent environmental review, OHA notes that DON training and test activities at PMRF have significant impacts on marine ecosystems, particularly marine mammals, given the use and testing of Navy sonar from the PMRF area. Even within the defined ROI, the use of bright lights at both DON and NASA facilities can negatively impact breeding, feeding and migration of native seabirds including threatened and endangered species. Given the significance of these cultural/biological resources to OHA's beneficiaries OHA requests that a more complete summary of effects on biological resources be provided in addition to a reference to other relevant federal review documents. *See, e.g.,* DEIS at 3-85.

Closing Remarks

Mahalo for the opportunity to comment. OHA looks forward to seeing our comments taken into consideration as the Final EIS is being prepared. Should you have any questions, please contact OHA's Compliance Advocate, Kaweni Ibarra at (808) 582-0488 or by email at kawenii@oha.org.

'O wau iho nō me ka 'oia 'i'o,

Stacy Ferreira
Ka Pouhana, Chief Executive Officer

SF:kikfll

CC: Kaiali'i Kahele, Ke Kauhuhu, Chair, OHA Board of Trustees
Dan Ahuna, Ke Kua 'O Kaua'i, OHA Trustee for Kaua'i
Dawn Chang, Chairperson, Board of Land and Natural Resources

DEIS Comment Letter 0123

PMRF-1198 (Record 6 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Hope	**Last Name** Kallai	**Mailing List** Yes	
Street POB 655	**City** Kilauea	**State** HI	**Zip** (none)
Email lokahipath2@live.com		**Organization**	
Attachments Yes • File Attachment: 2025_aug._7_pmrf_eis_comments_.pdf			
Comments Please accept my attached comments. Mahalo			

DEIS Comment Letter 0123

info@pmrf-kpgo-eis.com
kerry.k.wells.civ@us.navy.mil

August 3, 2025

RE: ***PMRF and KPGO Real Estate***
Draft Environmental Impact Statement

Aloha e Kerry and EIS Team:
Please consider my comments in the Final Environmental Impact Statement on PMRF leases and easements.

1. PMRF RUNWAY REPLACEMENT NOT ADEQUATELY CONSIDERED IN THIS DEIS[1]. In Table ES-1 under Biological Resources on page ES-7, Volume 1, the DEIS states "there would be no change in operations or current activities on the leasehold and easement land" considered in both Alternatives 1 and 2, but the ***PMRF Land-Based Training and Testing EA***[2] considers many-fold increases in many operations on base lands and easements.

The ***PMRF Land Based EA*** Pdf page 27 states:

> The Proposed Action also includes increases in training and testing activities conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight.

The ***PMRF DEIS*** Volume 4, Pdf page 1324[3] states:

> "Currently, PMRF is limited to the number of landings/takeoff allowed per runway design and life cycle. In 2025, it is anticipated the runway will be replaced to allow for additional flights and accommodate increased aircraft exercises from DoD agencies. Projections for future air operations at PMRF are detailed in Figure 1. This includes a projected increase in usage by C-17 cargo airplanes (from 176 passes per year to a projected 4,320 passes per year) and the ability of 1,440 MV-22 Osprey landings per year at PMRF."
> "On average, the PMRF airfield accommodated 6,441 takeoff/landings annually between 2014 and 2020."

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[1] https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of-4.pdf

[2] https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf

[3] https://pmrf-kpgo-eis.com/media/5qyjldgz/pmrf-and-kpgo-re-deis-appendices-i-l_volume-4-of-4.pdf

PMRF DEIS Volume 4, Pdf page 1325 includes Figure 1 showing doubling of air operations at PMRF (below). This runway upgrade on USA fee simple land allows for significant increases in air operations and military activities, like RIMPAC, held every other year for 5 weeks with 36 nations involved, on fee simple, state leasehold and easement lands as 1 "Activity."

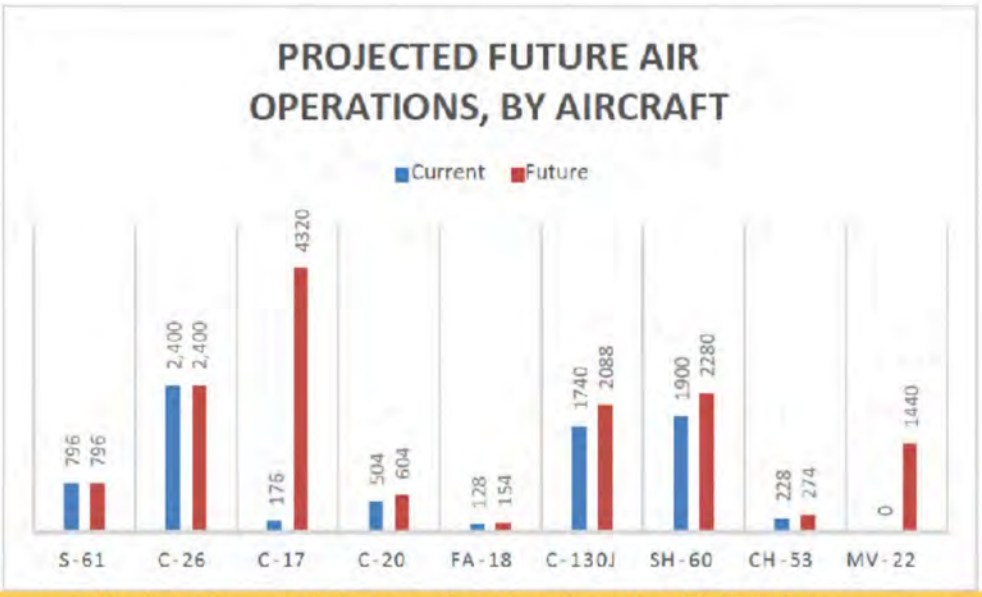

Figure 1. Projected annual air operations by aircraft at PMRF (passes per year).

Aircraft	Current	Future
S-61	796	796
C-26	2,400	2,400
C-17	176	4,320
C-20	504	604
FA-18	128	154
C-1301	1,740	2,088
SH-60	1,990	2,290
CH-53	228	274
MV-22	0	1,440
Annual	7,962	14,356

2024 PMRF Land-Based Training and Testing EA, Pdf page 30.

PMRF Land-Based Training and Testing Draft EA August 2024

Activity Name	Activity Description	Training & Testing Area	Ongoing # of Annual Activities*	Proposed # of Annual Activities
Forward Arming and Refueling Point (FARP) Operations	Establish, operate, and re-deploy a FARP site using the Tactical Airfield Fuel Dispensing Systems, Helicopter Expedient Refueling System, or similar type expeditionary aircraft refueling system. Aircraft examples: MV-22, KC-130, CH-47, AH-64, FA-18, F-35, P-8.	FARP Areas	1	20
Small Unmanned Aircraft Systems (sUAS) and Counter-Unmanned Aircraft Systems (UAS) Operations	Conduct sUAS operations. Launch and control sUAS. Conduct counter-UAS operations. Launch and control a counter-UAS system from a land location.	UAS Launch Area	2	45
Parachute Operations	Conduct parachute operations (land).	ARDEL Circular Drop Zone (CDZ), Bunker CDZ, Golf Range CDZ, and Kukui CDZ	1	16
Command, Control, Computing, Communications, Cyber, Intelligence, Surveillance, Reconnaissance and Targeting Exercise to include Command Post Exercise, Communication Relay Exercise	Establish and operate a tactical field command post, communication systems, radar tracking and surveillance systems, optical tracking systems, and electronic warfare equipment operated on concrete areas or by mobile vehicles.	North Launch Area 1	1	30
		North Launch Area 2	5	12
		South Launch Area	1	18
		MDA Hard Stand	2	10
Bivouac (unit, medium, large)	Establish and operate expeditionary field lodging for personnel conducting training.	Airfield Bivouac Area	5	26
		MDA Hard Stand	1	4
		Palai Olani	1	6
		North Launch Area 2	1	9
		Alternate Bivouac Area (ARDEL)	1	2

Table 2.1-1: Proposed Training and Testing Activity Descriptions

Activity Name	Activity Description	Training & Testing Area	Ongoing # of Annual Activities*	Proposed # of Annual Activities
Missile, Rocket, and Aerial Target Drone Launch	Terrestrial portion of launching missiles, rockets, and aerial target drones from established launch areas ashore. Aerial or surface target intercepts to occur offshore, on or above water.	North Launch Area 1	16	15
		North Launch Area 2	9	20
Missile, Rocket, and Aerial Drone Target Set-up (No Launch)	Conduct non-live-fire missile or rocket system launch preparation by deploying, making ready for launch, and redeploying a transportable tactical missile or rocket system.	North Launch Area 1, North Launch Area 2, and South Launch Area	1	6
Artillery	Terrestrial portion of land-based forces live firing of artillery guns at surface (waterborne) or air targets.	North Launch Area 2	1	3
Amphibious Operations (Raid, Small Boat Operations, Swimmer Insertion/Extraction)	Raid. Company (unit-sized) forces move from amphibious ships at sea, conduct amphibious landing via various vessels/watercraft/vehicles, and conduct follow-on activities ashore. Return to amphibious ships at sea.	Waiapuaa Bay Amphibious Landing Area	1	2
	Small Boat Operations. A Unit using small boats move from offshore location to a beach landing site, carry boat to an inland site, conduct reconnaissance, and then return to the sea via small boat.	Waiapuaa Bay Amphibious Landing Area, and Divers Landing	2	19
	Swimmer Insertion/Extraction. Personnel conduct Over-the-Beach water entry swimmer insertion and extraction training in PMRF amphibious landing areas.	Waiapuaa Bay Amphibious Landing Area, Divers Landing, and Over-the-Beach Landing	1	2

Activity Name	Activity Description	Training & Testing Area	Ongoing # of Annual Activities*	Proposed # of Annual Activities
Air-to-Ground Gunnery Exercise (GUNEX)	GUNEX involves strike fighter aircraft and helicopter crews employing guns and inert rockets to attack ground targets, day or night, with the goal of destroying or disabling enemy vehicles, structures, or personnel. Inert ordnance only. GUNEX may include the use of targeting laser.	Kaula Island	14	24
Air-to-Ground Bombing Exercise (BOMBEX)	BOMBEX involves training of strike fighter aircraft delivery of inert ordnance only against land targets in day or night conditions and may include the use of targeting laser.	Kaula Island	12	31
Helicopter/Tilt-Rotor Landing Zone (LZ) Operations (off airport surface)	Helicopter/Tilt-Rotor aircraft conduct LZ Operations (off airport surface). Deliver/recover personnel or equipment from/to unimproved landing zone locations.	Fire Pit LZ	1	12
Ground Maneuver	Units conduct land movement to other land locations.	Improved roads and pathways	1	22

*Quantity represents the highest single-year activity occurrences, over the period 2018–2023.

The ***PMRF Land-Based Training and Testing Draft EA*** still under consideration, includes many new operations over leasehold and easement lands, not included in this real estate EIS which enables them. The impacts of runway replacement should be considered adequately in this DEIS. It is the most important feature of an air base and determines operations.

The Proposed Action also includes increases in training and testing activities conducted by the Army, Air Force, Marine Corps, and MDA. Training and testing activities may also include the participation of foreign militaries under U.S. sponsorship and oversight.

PMRF Land-Based EA Training and Testing EA includes Table 2.1-1 (above) on Page 30, detailing operations by "activities," which could be hours, days, weeks or months. It is impossible to extrapolate how many landings would occur in "20 activities" of unknown timing, duration or involvement.

This EA was supposed to be finalized prior to this EIS. This EA should be considered in a Supplemental Land-Based Operations EIS to this real estate EIS. Runway replacement and the resulting increase in activities are not considered in the EA. 20 Refueling training activities annually are proposed on the Nohili dunes, on Conservation District lands. [4]

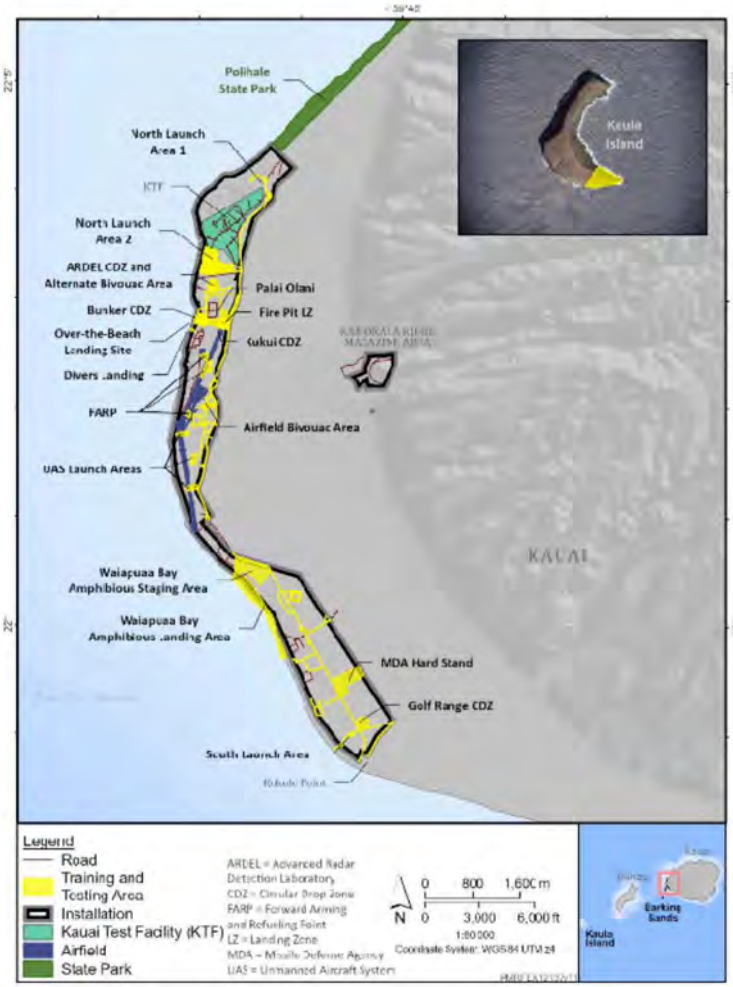

Figure 2.1-1: Training and Testing Sites in the Study Area

[4] https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf. PDF Page 29

2. The consideration of "No impact" is based on stale science and past operations. Because past levels of operations have not had significant impact, it cannot be assumed that these great increases would not. Doubling or tripling training operations as proposed in the 2024 PMRF Land-based Training and Testing EA[5] has great potential for additional impacts to the lands and infrastructure considered in this DEIS. Some activities are quadrupled, some increased from 1 event annually to 30, to be held when humpbacked whales, monk seals and turtles are not present. BASH activities, hazing and relocations will be increased.

PMRF Incidental Take Permits, 2014, 2017 & 2025

Bird Species	2014 Cause *2025 Cause*	Take Average	Take Limit 2014 2025	Egg/Nest Take	Egg/Nest Limit
Newell's Shearwater **'Ua'u kani**	Fallout due to lighting *Collision with towers* *Collision with elec lines*	Up to 3 fledgelings/yr	Up to 9 fledgelings/yr	2017 ITP Up to 3/yr	
Hawaiian Petrel. **'Ua'u**	Fallout due to lighting	Up to 1 every 10 years	Up to 2 fledgelings/yr	2017 Up to 2/yr	
Band-rumped Storm Petrel **'Akē'akē**	Fallout due to lighting	Up to 2 every 10 years	Up to 4 fledgelings/yr	2017 Up to 2/yr	
Hawaiian Hoary Bat **'Ōpe'ape'a**	Barbed-wire fence entanglement *Vegetation Maintenance*	Up to 1/ 3 yr *Up to 2 adults, 4 pups/yr*	Up to 3/yr. *Up to 4/yr*		
Hawaiian Goose **Nēnē**	Collision, vehicles. *Aircraft Operations* *Nest Removal/relocation* *Launch Pad Ops* *Oxidation Pond reline*	Up to 2/yr *Up to 10/yr* *Up to 4/yr air ops* *Up to 3/yr nest reloc.* *Up to 1 nest/yr launch.* *Up to 1 nest/yr reline*	Up to 4/yr. *Up to 7/yr nest reloc*	Up to 10 eggs or goslings due to nest failure or abandonment *Up to average of 3 nests/yr, max 7/yr nest removal zone.* *1 nest/yr launchpad* *1nest/yr Oxi pond*	Up to 50 eggs or goslings due to nest failure in suboptimal habitats after being relocated by base hazing
Hawaiian Moorhen **'Alae'ula**	Collision, vehicles *Aircraft collisions*	Up to 2/yr *Up to 5/yr* *Up to 1/yr air ops*	Up to 4/yr. 6/yr +3/10 yr		
Hawaiian Coot **'Alae ke'oke'o**	Collision, vehicles. *Aircraft Operations.* *Oxidation Pond*	Up to 1/yr *Up to 2/yr* *Up to 1/yr Air Ops.* *Up to 1/yr pond relining*	Up to 2/yr *Up to 4/yr*		
Hawaiian Duck. **Koloa Maoli**	Collision, vehicles. *Aircraft Operations.* *Oxidation Pond* *Incidental capture*	Up to 1/yr *Up to 3/yr* *Up to 1/yr air ops.* *Up to 1/nest yr relining* *Up to 3/yr capture*	Up to 2/yr *Up to 8/yr* +3/10 yr	*Up to 1 nest /yr*	
Hawaiian Stilt **Ae'o**	Collision, vehicles. *Aircraft collision*	Up to 1/yr *Up to 1/yr* *Up to 1/yr air ops*	Up to 2/yr *Up to 2/yr*	Up to 20 chicks or eggs or 5 nests lost in suboptimal habitat after being relocated by base hazing	
01EPIF00-2014-F-0066 01EPIF00-2015-F-0227 01EPIF00-2016-F-0497 *EISX-007-17-USN-1749043386*					

[5] https://pmrf-kpgo-eis.com/media/4nqhvudb/2024-pmrf-land-based-training-and-testing-draft-ea.pdf

The 2014 Incidental Take levels established by the USFWS, (Pdf page 1225, Vol. 4) had to be increased due to increasing bird mortality due to vehicle and aircraft collisions, tower and electrical line impacts and botulism outbreaks in the Oxidation Ponds.

The 2025 take levels found on Page 1371, Vol 4 are greatly increased, but not enough to reflect the expected increase due to escalating training activities presented in the EA.

The ***2023 Integrated Natural Resources Management Plan***[6] states on Pdf page 188 :

> An avian botulism outbreak occurred in the winter of 2014/2015 at Barking Sands, resulting in the loss of at least 22 birds including 20 Hawaiian Ducks and 2 Hawaiian Coots. Two additional Hawaiian Ducks were captured and rehabilitated by the SOS veterinarians and released. Since then, smaller outbreaks have occurred in the summer as well as winter but have been relatively under control due to increased monitoring efforts.

The Incidental Take Permit levels established by USFWS would have been exceeded for 20 Hawaiian Ducks and 2 Hawaiian Coots as there are no Incidental Take considerations for mortalities caused by repeat outbreaks of avian botulism in the Oxidation Ponds. There must be a better option for base wastewater than putting raw sewage in open, unlined ponds so near the ocean, with abundance of impacted endangered waterbirds. Alternative options for wastewater are not considered in this EIS. Botulism outbreak prevention methods were not considered in this EIS, even with takes and annual outbreaks.

3. The Cultural Impact Assessment was inadequate in community outreach. The only Native Hawaiians interviewed had generational economic ties to the base. Non-base Hawaiians need to be interviewed and their comments considered. Many Scoping Session cultural practitioner commentors have been impacted greatly by base security measures. These longterm leaseholds have restricted access and cultural practice for 3 generations already. The ongoing impacts to traditional cultural practices and gathering not adequately considered, especially fishing and spiritual practices around Nohili Dunes. An alternative launch site to Nohili should be considered, not on unique sand dunes considered necessary for spiritual recharge and connecting with ancestors, considered Traditional Cultural Property (TCP) in this DEIS. Why this place

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[6] https://pacific.navfac.navy.mil/Portals/72/NAVFAC_PACIFIC/Documents/NEPA Info/2024/Final Draft PMRF INRMP December 2023.pdf?ver=BJZPkLdupQezP8EePj3thg==

for missile launches? What alternative was considered? How can the base rent of the lease of this unique property full of iwi kūpuna be determined?

There should be a culturally appropriate place to reconnect with ancestors that does not require a base pass, unobtainable to many community members.

The impact of missiles and magazines underground at Kamokalā, in a pali surrounded with cultural sites, rock walls, heiau and loina is not appropriately considered in this DEIS or even understood by outsiders.

Photo 84. Feature 1 at Site IA002: rock wall on southern side; view to the east.

Part of ancient rock wall on Kamokalā Ridge, by magazine ordnance area.

The DEIS conversely states there are 10 underground missile magazines, with Magazines 12 and 13 being constructed in 2012 and 2013 on Tract E-3, Parcel 1 and E-3, Parcel 2 and the Kamolakā Ridge addition. It is unknown what the presence of munitions magazines does to the market value or lease rate of these lands or if more magazines will be necessary for the increased operations.

One underground missile silo is intended as evacuation shelter for an unknown number of base residents. Capacity and facilities should be

included. DEIS should include evacuation procedures for multi hazard events for all levels of base training events.

The continued military presence in a formerly neutral kingdom impacts everybody in Hawaii, not just westside Kauaians. Many testifiers at the public meetings were angry and hurt about being kept out of their traditional lands. There is generational angst abut the base that no EIS can fix

4. EIS does not adequately consider the impacts of passive flooding and sea level rise from climate change. The only Climate Change impacts considered were coastal not including the re-watering of 3 square miles of former historic marsh from passive flooding predicted to be 2' by 2050. Current pumpage rates will not suffice to dry the swamp, much of which is below sea level.

Volume 1 of DEIS includes a 3.2' Sea Level Rise map on page 164, only stating:

The following leasehold and easement lands are located within the 3.2-foot sea level rise exposure area scenario for purposes of BLNR's analysis under HEPA:

- Leaseholds:
- Tract E-1,
- Tract E-2,
- Tract E-2-A,
- Lot 1, Lot 3,
- Lot 7, Lot 10,
- Lot 13,
- Lot A-1,
- Lot B; and

- Easement Lands:
- GHA Easement 1,
- GHA Easement 2, Easements 100 – 104, Easement B,
- Easements B-1 – B-6, Easement D,
- Easement F,
- Easement G Pt 1, Easement G Pt 2, Easement H

Consideration of long term leases in a tsunami zone requiring the ongoing draining of swamp land deserves way more consideration than just a mere list of impacted lease lands and an orange colored map to show sea level rise, usually shown in blue. There is no operational information included for each leasehold, which is considered in the uncompleted EA.

There is inadequate consideration for the hydrology of Mānā Plain and the series of 26 miles of ditches transporting water through the drained swamp in **3.7 Water Resources**, pdf page 274, Vol.1. PMRF and dryland agriculture in the Mānā Plain are dependent on the continued de-watering of the 1,700 acre Mānā Swamp.

The Mānā Well (TMK 412002028, Water Lot 12, a 0.264 acre Ag zoned property, Market Value $224,400, including access road, Sixth Amendment to General Lease No. S-3852), (Amendment 6), CSF 24336) providing potable drinking water to the base, is under leasehold consideration. An estimate for the lease rent for this valuable well site is not included. The only alternatives (purchase or no lease) did not consider the well operation being taken over by any other leaseholder, like DHHL or KAA or ADC. The DEIS does not consider the impacts of no pumping. How much of the Mānā Plain would rewater and how deep?

DEIS does not mention cost of pumped groundwater or if the CWRM has established a pumpage limit.Estimates included in the DEIS are the Mānā Well pumps 2 MGD, the main base using about ~.5 MGD. The remainder ~1.5 MGD needs to be explained.

In the ***2014 FEA Mānā Plain Wetland Restoration Project***[7] includes consideration of a 2012 water budget analysis completed by Kamman Hydrology & Engineering, Inc. A salt budget was also performed. The wetland basins created to form Kawai'ele Waterbird Sanctuary are supplied with groundwater, except basin N3, which uses only ditch water and N13 which uses a mixture of ditch and groundwater. The groundwater comes from an artesian well on ADC state property at about 30-35 gpm. This contribution of artesian well water is not considered in the PMRF DEIS from this well and any other unused, now artesian, wells in the former swamp.

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[7] https://files.hawaii.gov/dbedt/erp/EA_EIS_Library/2014-02-08-KA-FEA-Mana-Plain-Wetland-Restoration-Project.pdf

It is unknown if the water budget was updated for this re-established 100 acre wetland and if a water budget will be updated again after completion of the proposed 200 acre Open Floodable Space REPI project.

The DEIS barely mentions the draft NPDES permit (HI0021940/HI0021945) required for the ditch outfalls on Navy fee-simple lands and the water quality issues of atrazine, metolachlor, turbidity and 40 other agricultural chemicals found in the water delivered from ADC lands and the shrimp farm. The NPDES permit needs to be completed for inclusion in the FEIS.

In 2021, ***Impact of Sea-Level Rise on the Hydrologic Landscape of Māna Plain, Kaua***i[8] abstract states:

> **Abstract**
>
> The Mānā Plain is a land apart, buffered from oceanographic influences by ~3–35 m high backshore deposits, and drained by an intricate, >100-y-old ditch system and modern, large-capacity pumps. Quantifying present and prospective inputs and outputs for the hydrologic landscape suggests that, although sea-level rise (SLR) will begin to impact ditch system operations in 2040, transient, event-based flooding caused by rainfall, not SLR induced, multi-mechanism flooding, will continue to pose the most immediate threat. This is because as sea level rises the ability of gravity flows to discharge storm runoff directly into the ocean will diminish, causing floodwater to pond in low-lying depressions. Estimates of the volume of water involved suggests the risk of flooding from surface water is likely to extend to 5.45 km2 of land that is presently ≤ 1 m above sea level. This land will not be permanently inundated, but weeks of pumping may be required to remove the floodwater. Increasing pumping capacity and preserving some operational ability to discharge storm runoff under the influence of gravity will enhance the ditch system's resilience to SLR and ensure it continues to fulfill its primary functions, of maintaining the water table below the root zone and diverting storm runoff away from farmland, at least until the end of this century.

Weeks of pumping to remove floodwater would greatly impact base operations, not considered in this DEIS. Future agriculture in the Mānā plain may revert to wetland taro and fish farms.

Page 10 of the Impact of Sea-Level Rise report states:

> For example, were an event of similar magnitude to the March 2020 storm to occur towards the end of this century, the mixed semidiurnal tidal cycle (which has a mean and diurnal range of 0.38 m and 0.56 m, respectively) superimposed on the projected 1 m rise in sea level would increase the amount of time required for floodwater to drain freely to the ocean by ~50%.

---

[8] https://www.mdpi.com/2073-4441/13/6/766

Page 12 continues:

> On this basis, by the end of this century 25% of the agricultural land on the Mana Plain may be exposed to flooding that is an indirect operational consequence of SLR. This land will not be permanently inundated, but it could require weeks of pumping to remove the accumulated floodwater, and the present pumping capacity of ~189,000 m^3/day will likely need to be increased.
>
> SLR will reduce the proportion of storm runoff that is able to flow into the ocean through Kinikini Ditch, and its near-term effects will begin tobe felt by 2040. After which time the ditch system be vulnerable to seawater intrusion if the ditch plug is removed to allow water to be discharged under the influence of gravity. As sea level rises and gravity flows can no longer be relied upon to deliver water originating from drainages on Pu'u Ka Pele slope directly into the ocean, the propensity for low-lying land on the Mana Plain to flood will also increase. The risk of flooding from surface water could extend to all 5.45 km^2 of land ≤ 1 m MSL (Figure 4c). Although this land will not be permanently inundated it may require weeks of pumping to remove the floodwater.

An alternative should be considered in the DEIS if the base needs to move, retreat and/or relocate some facilities to higher ground. Alternative 2 is only a change of tenure, not a real alternative consideration.

Sustainable Yield of this Kekaha aquifer 20301 is estimated to be 10 million gallons per day. Consideration of the Mānā Well pumpage is not considered in the 2024 Kauai Water Use and Development Plan, which states current pump rates for entire aquifer is 1.58 MGD, with 2035 total buildout being 1.72 MGD. Total General Plan buildout is predicted to use 4.28 MGD. I believe the other wells in Kekaha contribute to the current 1.58 MGD pump rate, military pumpage of 2 MGD not included. Abandoned, now flowing artesian wells are not included. There are mistakes and omissions in the current usage rates considered in SY.

5. DEIS fails to consider the Conservation District Use Permit application process. Conservation District impacts not adequately considered and there is lack of discussion about obtaining Conservation District Use Permits, even on state lease lands. It is unsure what zoning is appropriate for ordnance assembly and missile launching, but a site considered spiritual Traditional Cultural Property should not be a launch pad for war training.

6. Base construction does not adhere to FEMA flood specs, the 2019 National Defense Authorization Act and 50 year project life. Base operations will be severely compromised with 2' passive sea level rise. Considerations under this DEIS in are not compliance with federal and state policies, like Coastal Zone Management. The Base Flood Elevation (BFE) for the base is between 15' and 25'. The FEIS must adequately

consider impacts of increased flooding due to climate change and alteration of precipitation event intensity.

7. DEIS fails to explain why Ocean Right-of-Way lease of 7,680 acres of submerged lands expiring in 2030 is not being considered and the future usage of those nearshore lands.

> The Navy currently holds a lease for 7,680 acres of submerged lands in an ocean right-of-way (ROW) at PMRF, which is also set to expire in 2030. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy is not pursuing a new real estate agreement for this area, and the ocean ROW is not part of the Proposed Action. The Navy will continue to use this area pursuant to Section 1314(a) of the Submerged Lands Act, 43 U.S.C. sections 1301 et seq., and U.S. Constitution Article I, Section 8, Clause 3. The use of submerged lands within the ROW area will remain consistent with current usage for navigation and national defense purposes (i.e., for underwater cables supporting at-sea training ranges[9]). In the future, if the Navy's use of this area significantly changes, the Navy would take appropriate actions in accordance with NEPA and inform stakeholders as appropriate.[10]

DEIS is unclear about impacts of increased training exercises over this ROW and if these cables are obsolete, will they be removed?

8. Bifurcating real estate and land based operations into HEPA/NEPA EIS and NEPA EA segmentalizes project.

Decisions on land leases cannot be made independent of operational considerations for those lands. The amount of Hawaii projects being concurrently presented is overwhelming.

Currently, there are way too many cumulative impacts and secondary impacts from all the concurrent EIS/EA proposals[11] that have not been considered. Final acceptance of this EIS must include consideration of the concurrent projects being proposed:

---

[9] All data transmitted from the undersea cables are received by facilities on Navy fee simple land, where the data is then recorded and processed. These activities operate independently from the leased parcels in the Project Area.

[10] https://pmrf-kpgo-eis.com/media/js3fdzdb/pmrf-and-kpgo-re-deis_volume-1-of-4.pdf. PDF page 69.

[11] https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf

1. Hawaii-CA Training and Testing EIS/OEIS (in water)
2. PACDERMA System Project-Underwater Electromagnetic Measurement System Testing EA (in water).
3. Open Floodable Space EA (land based)
4. Kawai'ele Pump Operation and Maintenance (land based).
5. Integrated Natural Resources Management Plan EA.
6. PMRF Land Based Training and Testing EA (land based).
7. PMRF-KPGO Real Estate EIS (land based).

9. There should be no long term leases for military operations without annual cleanup requirements and periodic inspections. The DEIS describes piles of Navy metal rubbish left in the Koke'e forest that need to be removed from state lease lands.

Rubbish, including metal, old fencing, burnt barrels, cars and car parts, concrete, glass and unknowns, need to be cleaned up ASAP, with annual cleanup conditions and inspections included in the leases.

Photo 55. Site IA012: Bundles of rusted barbed wire found adjacent to canal; looking west.

tal burnt barrel pile at Site 50-30-01-2049; looking south.

Photo 45. Example of concrete and metal debris rubble pile; looking north.

The entire 158 acre Ka'ula Island seabird sanctuary is "inaccessible" due to years of unexploded ordinance (UXO) that missed the 10 acre target area. The entire island must be cleaned up with current avian surveys before expanded operations can be considered, like 24 GUNEX and 31 BOMBEX activities annually.

No state land leases without inspections and annual clean up. No more UXO left forever on state land.

10. Alternatives to the base sewer "Oxidation Ponds" should be considered to prevent avian botulism, reduce hazing needs and to move from tsunami zone. Surface dumping of untreated base wastewater and sewerage into unlined ponds has created inadvertent habitat for waterbirds, and is the only surface water available on the main base, besides the ditches, creating a high risk condition for algae blooms and botulism outbreaks.

The take of 20 Hawaiian Ducks and 2 Hawaiian Coots in the 2015/2015 botulism outbreak cannot be repeated. Ponds should either be entirely fenced off from birds (creating potential increased impacts to bats) or replaced with tanks. ITP should include botulism takes.

Open, un-lined, untreated sewage ponds with algae blooms, turbidity and botulism, near the ocean, the only available surface water habitat..

11. There needs to be an onsite biologist to daily monitor takes under the Incidental Take Permit, not base staff, during the 10-year term of the Incidental Take Permit. DEIS Page 1243, Vol. 4 states:

> *KESRP Field Assistant*
> The Navy provided a full-time Endangered Seabird Field Assistant to the Hawaii DLNR KESRP for four months in 2012 (15 May through 15 September). This position was funded by the Navy at a total of $28,000. The Navy also funded KESRP in the summer of 2013 to conduct nest monitoring in currently-known Newell's shearwater colonies on Kauai at a funding level of approximately $40,000.

The Navy should fund annual salaries for 2 full-time DLNR Seabird Field Assistants for the base monitoring and off-site seabird mitigation improvements for the entire lease term. The Na Pali Seabird colony is statistically significant so night flights and training activities should be discouraged during seabird nesting from mid-March to November.

12. Use of trained conservation dogs should be expanded and backup dogs obtained. Herding by trained dogs may have the least impacts of all BASH alternatives. Carcass recovery is improved thousand-fold by daily use of dogs. DLNR Seabird Field Assistants may receive Conservation Dog Training and be the handler. Use of Conservation Dogs is essential.

13. Final Jurisdictional Wetland Determination should be obtained from USACE and included in FEIS. The Wetland Determination, beginning on PDF Page 1,426, Vol. 4 concludes on page 1,450 with:

> **CHAPTER 5**
> **Conclusion**
> Based on the results of the wetland delineation, there are **17 individual PEM/PSS wetlands i**n the study area, comprising approximately **22.96 acres**, which exhibited the necessary parameters to be considered jurisdictional wetlands and **16.25 acres of ditches that should be considered potential waters of the U.S**. (see Table 3 and Figures 8–11 in Appendix A).
>
> The USACE, under the authority of Section 404 of the CWA and Section 10 of the Rivers and Harbors Act, has the authority to make the final determination of the jurisdictional status and extent of waters of the U.S., including wetlands, within the study area. This report represents the best scientific judgement and opinions of the Stantec biologists that conducted the delineation and should be considered preliminary until concurrence has been obtained from the USACE Honolulu District in the form of a Jurisdictional Determination.

DEIS Comment Letter 0123

A USACE Jurisdictional Determination needs to be included in the FEIS.

Figure 5 Wetland Delineation USGS Topographic Map

Figure 8 Wetland Delineation Survey Overview

Figure 9 Wetland Delineation Survey 1 of 3

Figure 10 Wetland Delineation Survey 2 of 3

Figure 11 Wetland Delineation Survey 3 of 3

Photo 1. Data Point C, Wetland

Figure 12 Location of Photo Points

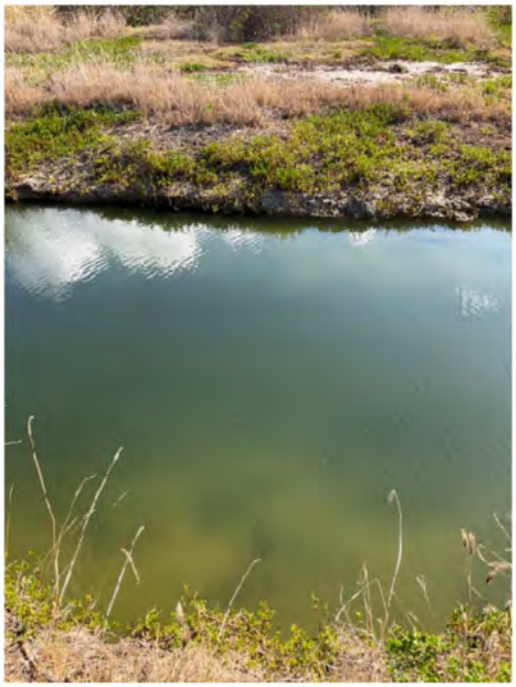

Photo 5. Smaller Ditch, Typical

Photo 2. Smaller Ditch, Typical

Photo 4. Larger Ditch, Typical

Photo 9. Data Point E, Wetland

Delineated Wetlands at Mānā

The USACE Jurisdictional Determination needs to be obtained and the future hydrology of the 22.96 acres of wetlands and 16.25 acres of WOTUS ditches established and considered in the FEIS.

The Operational Land-Based DEA should be expanded to a Supplemental EIS and increased operations specific to the lease lands being considered.

As with the Pōhakuloa lease consideration, the Navy has had 65 years to complete the required science for this base real estate lease

consideration. The Navy should finish their science before applying for long-term leases.

The FEIS should include consideration of the re-watering of the 22 acres of delineated wetlands and how much water will be required to re-establish suitable habitat for waterbirds, along with the 200 acre REPI grant project, the Open Floodable Space[12]:

> **3. Open Floodable Space EA**
> The proposed action is to manage a 200-acre open floodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals.

The Ongoing Environmental Reviews at PMRF[13] does not include a timeline for the Floodable Space Project EA and the Kawai'ele Pump Operation and Maintenance EA, but does for the remaining 5 concurrent projects.

> **3. Open Floodable Space EA**
> The proposed action is to manage a 200-acre open loodable space adjacent to interior northern portion of PMRF Barking Sands to manage and mitigate sea level rise encroachment on installation grounds and surrounding agricultural lands. The open space would include an additional 200-acre buffer to provide suitable habitat for native plants and animals.
> **4. Kawai'ele Pump Operation and Maintenance EA**
> The Navy proposes to continue operation and maintenance of a pump system on 3 acres of federal land to control water levels and preserve the agricultural viability of surrounding lands within Mana Plain.

Both these EA's need to be included for consideration in the FEIS as they determine the dry future of the base and operations and the use of huge modern pumps on old, eroding ditch systems.Again, the Navy should finish their science before applying for long term leases.

Climate change is not adequately considered in this DEIS, with climate change flooding impacts expected at PMRF by 2040, not in compliance with the 2024 Department of Defense Climate Adaptation Plan[14] which calls for plans that can sustain for 50 years, not 15.

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[12] https://cnrh.cnic.navy.mil/Portals/79/PMRF_Barking_Sands/Documents/PMRFProjectDescriptionsFINAL20250521WEB.pdf?ver=nQfhkxtqWzTA7q_XdFwudw==

[13] https://pmrf-kpgo-eis.com/media/2abp1hcb/pmrf_project_descriptions_august-2024.pdf

[14] https://www.sustainability.gov/pdfs/dod-2024-cap.pdf

14. Only the shortest long-term lease should be considered. Lease term is unspecified, except in the USFWS Biological Opinion which states 50 years. Page 1226, Volume 4 of the DEIS states:

> The term of the proposed action is 50 years.

A 50 year lease is way too long. Unpredictable changes in technology will have advanced so much in the next 50 years, PMRF may be obsolete within 50 or 65 year lease term..

Right before the last 65-year lease was issued, my family lived on Midway Island. My father was a Navy pilot, and flew a Willy Victor on the DEW Line. That was of paramount importance back then. Now, few non-uniformed folks even know what that means. Sixty-five years from now, missiles may be antiquated and archaic, replaced with lasers from space or technology totally unknown to us now. Or perhaps from underwater.

It is also impossible to predict the future depth of the Mānā Swamp groundwater aquifer and how much pumping will be necessary to keep lands contiguous to the base dry. Only the shortest long-term lease should be considered by BLNR, after the Navy completes science and reports.

It is not the military's job to control development on the Mānā Plain, the wetlands determine appropriate activities, which may be lo'i kalo and loko i'a not ranching.

15. Alternatives should be presented in this DEIS for retreat from the shoreline and historic marsh areas as they will soon be wet again. You can't wage war on the ocean The ocean always wins.

Mahalo for your considerations and including my comments in the FEIS.

Hope Hamilton Kallai
POB 655
Kilauea, HI 96754
lokahipath2@live.com

DEIS Comment Letter 0124

PMRF-1199 (Record 5 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Laurie	**Last Name** Atienza	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments I do not support the proposal. The US military does not act responsibly with respect the land that they already occupy. The have not cleaned up land on Kaho'olawe and O'ahu that was used for military practice and I have concerns about environmental impacts, cultural preservation, and the rights of Native Hawaiians. Thank you.			

DEIS Comment Letter 0125

PMRF-1200 (Record 4 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Kawailani	**Last Name** Fifita	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments BIG NO !!!			

DEIS Comment Letter 0126

PMRF-1201 (Record 3 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Enrico	**Last Name** Atienza	**Mailing List** No	
Street (none)	**City** (none)	**State** (none)	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments The Navy has not demonstrated responsible stewardship of land in HI alreay occupied and should not be granted additional land in the State.			

DEIS Comment Letter 0127

PMRF-1202 (Record 2 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Michelle	**Last Name** Ma	**Mailing List** Yes	
Street 2839 Henry st 3f	**City** Honolulu	**State** HI	**Zip** (none)
Email		**Organization**	
Attachments (none)			
Comments Oppose.			

DEIS Comment Letter 0128

PMRF-1203 (Record 1 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Aya	**Last Name** Mack	**Mailing List** Yes	
Street Po	**City** Hanalei	**State** HI	**Zip** (none)
Email		**Organization**	
Attachments (none)			

Comments

• Adopt non-explosive, simulated training to protect marine ecosystems and reduce environmental damage consistent with NOAA Marine Mammal Protection Act guidance. Assess decades of accumulated impacts on marine mammals, fisheries, and habitats, require long-term, independent monitoring rather than short-term studies. • Protect water resources annual groundwater modeling and drinking water safety assessments in compliance with Hawai‘i Constitution Article XI, Section 7. •Monthly independent water quality testing at all ephemeral and perennial streams flowing to the ocean. •Mitigate habitat fragmentation from road and facility construction. Evaluate coastal facility viability under sea level rise and climate change projections per HRS §225P-3 & §225P-4. • Honor public trust and Native Hawaiian rights (Ka Pa‘akai precedent, Hawai‘i Constitution Article XII, Section 7) with full consultation and cultural impact analysis. •Fuel Tanks Pose Serious Risks. PMRF stores over 350,000 gallons of fuel in aging tanks across the base, including 9 tanks holding 50,000 gallons each. The DEIS does not provide a full inventory of fuel storage or any recent soil and groundwater test results even after the catastrophic Red Hill leak. Technology now allows for high-fidelity simulated training that eliminates the need for live explosives in or near sensitive marine areas. These alternatives could consolidate site operations, reducing environmental damage but maintaining training readiness. The EIS must evaluate non-explosive training alternatives that protect marine mammals, reef systems, and fisheries, in alignment with NOAA Marine Mammal Protection Act guidance, and reduce the risk of chronic acoustic disturbance in protected waters. The EIS must also address decades of accumulated impacts from testing and training activities. Current data collection is limited, and short-term, isolated studies cannot adequately assess chronic impacts to sea life — particularly humpback whales and Hawaiian monk seals, which require long-term, independent monitoring. Our water resources are dwindling we need to protect our natural resources before they are all gone.

DEIS Comment Letter 0129

PMRF-1156 (Record 44 of 56 Total Entries)			
Form Name	PMRF Draft EIS Comment Form		
First Name Stephenie	**Last Name** Blakemore	**Mailing List** Yes	
Street 4780 Iiwi Rd. Unit 2	**City** Kapaa	**State** HI	**Zip** (none)
Email stephenieblakemore@sbcglobal.net		**Organization** none	
Attachments (none)			
Comments I have reviewed the EIS, and heard testimony from US citizens who have an ancient as well as cherished childhood connections to the lands in question. The heavy environmental toll on the both the ocean and land due to military presence is not adequately addressed. Cultural practices and history are also being ignored. There has to be a better way to provide the military with a secure place of operations and also recognize the need for cultural and environmental protections, which go hand and hand as part of who they are for those US citizens with deep Hawaiian roots. Address the impact of large aircraft taking off and landing on the runways as it impacts the birds and other wildlife who have few places left to thrive on Kaua‘i. Address the impact on the health of the ocean and its aquatic residents. Address the safe access to cultural sites, that include fishing and gathering practices, as well as honoring gravesites. Listen to the testimony from those who have been here as the descendants of a long line of native Hawaiians who lived here for centuries. Good solutions can and must be be found so that the Navy and NASA can be better guests, working in collaboration with those who made these lands their home first. Mahalo			

Comment numbers 0130 through 0176 are oral comments submitted at the Public Comment Meetings.

Shyanne Olores
PO Box 185
Lawai HI 96765

HONOLULU HI 967
4 AUG 2025 PM 2 L
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AUG 04 2025
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UNITED STATES OF AMERICA
FOREVER/USA

Naval Facilities Engineering Systems Command
Environmental OPTHEV2
Attention: PMRE and KPGO RE EIS Project Manager, MS. Kerry Ling
400 Marshall Road, Building X-11
Pearl Harbor HI 96860

96860-

DEIS Comment Letter 0177

DEIS Comment Letter 0177

Written Testimony Opposing the Lease Renewal of PMRF

Aloha, my name is Shyanne Olores, and I submit this written testimony as a descendant of Mana, of Nohili, and of the Hawaiian Kingdom. I stand in firm opposition to the proposed lease renewal of the Pacific Missile Range Facility (PMRF) at Barking Sands, Kaua'i.

I was raised in Nohili. I grew up fishing, gathering, and visiting the sand dunes where my ancestors are buried. My late grandparents were the last in our 'ohana to live in Mana town. My father and uncles hunted the Mana tunnels to feed our family. For generations, Mana, Nohili, and Polihale have sustained us, physically and spiritually. These places are sacred. They are ancestral. And today, they are being desecrated by the U.S. military.

Let me be absolutely clear: this is not America. These are stolen lands.

Kanaka Maoli have never ceded our lands. The overthrow of the Hawaiian Kingdom was illegal. There was no treaty, no consent, and no surrender. The lands under PMRF remain crown and government lands of the Hawaiian Kingdom — and the United States has no rightful claim to them. PMRF exists on occupied 'āina, and the continued military presence is a direct violation of our sovereignty, our culture, and our lives.

Over the past 7 years, seven members of my 'ohana from Mana and Kekaha have died from cancer. All of them worked in agriculture. We know this land has been poisoned. PFAS contamination has been documented at PMRF since the 1960s, and still — over 60 years later — the Navy has failed to clean it up. The Draft EIS casually states that "remediation is forthcoming," while Kanaka continue to die. That is environmental negligence and cultural violence.

The Navy stores hundreds of thousands of gallons of fuel at PMRF and refuses to provide full transparency on tank locations or recent groundwater testing. This is disturbingly similar to what we've seen at Red Hill — and we will not wait until disaster strikes to demand action. You are gambling with our health, our water, and our future.

The Draft EIS fails to account for the full mauka to makai impacts of PMRF operations. It ignores the destruction caused by rocket launches, amphibious assaults, live-fire drills, and ongoing military exercises such as RIMPAC. It completely omits the environmental and cultural devastation these activities cause — not only on Kaua'i, but globally, as PMRF supports the testing and export of weapons used in international conflict and genocide.

I am speaking not only for myself, but for my ancestors. For those whose iwi rest in the dunes of Nohili. For those who can no longer speak for themselves. And we reject all options presented in this DEIS.

We reject mitigation. We reject any expansion. We reject continued occupation.

We demand that the United States:
1. End the lease.
2. Clean up toxic contamination, including PFAS, fuel, and hazardous waste.
3. Restore sacred sites, including the dunes at Nohili.
4. Return all lands under PMRF to the rightful stewards — the Kanaka Maoli.

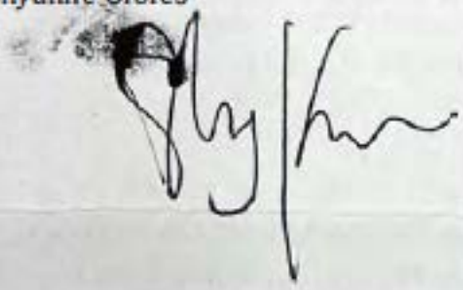
DEIS Comment Letter 0177

PMRF is not defense. It is desecration. And we will not stand by while our ʻāina, our culture, and our families are poisoned in the name of war and profit.

This is not America. This is Hawai'i. And the U.S. military must get out.

Mahalo for receiving this testimony. I do not stand alone.

Me ka ʻoiaʻiʻo,
Shyanne Olores



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Navy and NASA Letters in Response to Agency Comments on Draft EIS

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From:	info@PMRF-KPGO-EIS.COM
To:	Felicia Cowden; mrapozo@kauai.gov; kkualii@kauai.gov; abulosan@kauai.gov; Hope Kallai; cokcouncil@kauai.gov; fholland@kauai.gov; akaneshiro@kauai.gov; bcarvalho@kauai.gov
Cc:	Wells, Kerry Kylene CIV USN (USA); Shari.A.Miller@nasa.gov; Michele Lefebvre; ronald.k.shimabuku.civ@us.navy.mil; william.r.manley4.civ@us.navy.mil; Puri, Naadia S LT USN (USA); kaulana.k.mossman2.civ@us.navy.mil; robert.a.prince.mil@us.navy.mil; thomas.m.nizo.civ@us.navy.mil; jonell.s.kaohelaulii.civ@us.navy.mil; meagan.k.ostrem.civ@us.navy.mil; lydia.r.robertson.civ@us.navy.mil
Subject:	Draft EIS for PMRF & KPGO Real Estate EIS - Public Comment Summary Report, Now Available Online!
Date:	Monday, December 8, 2025 12:28:33 PM

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha Councilmembers, Kaua‘i County Council,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōke‘e Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We are greatly appreciative of the comments the councilmembers provided during their review of the Draft EIS and the discussions we had with you during the briefings convened back in August.

The public comment period for NEPA started on June 20, 2025, with the publication of the Notice of Availability (NOA) in the *Federal Register,* and for HEPA on June 23, 2025, with the publication of the Draft EIS in *The Environmental Notice*. The public comment period ended on August 7, 2025. The purpose of public involvement and outreach during the comment phase was to invite the public, elected officials, government agencies, nongovernmental organizations, Native Hawaiian Organizations, and all interested stakeholders to review and comment on the Draft EIS in accordance with NEPA and HEPA. One hundred and seventy-seven (177) comments were received during the public comment period.

Public comments on the Draft EIS are being reviewed and integrated into development of the Final EIS. The comments and insights provided during the comment period are valuable in shaping and refining the approach to analysis and assessing the potential environmental impacts of the Proposed Action. All comments received will be carefully considered in the development of the Final EIS, which is currently scheduled to be released in summer 2026.

The Draft EIS Public Comment Summary Report, which summarizes public comments received during the comment period can be found on the EIS website here: Draft EIS Comment Summary Report. The Final EIS will include detailed responses to all comments received during the public comment period. The Navy and NASA are committed to maintaining transparency throughout this process and will continue to meet regularly with federal, state, and local agencies, as well as Kaua‘i community groups throughout development of the Final EIS.

Our team looks forward to continued collaboration as we advance through the EIS process. Should you have any further questions or require additional information, please do not hesitate to contact us.

For more information, please visit the project website at **PMRF-KPGO-EIS.com**.

Mahalo,

Kerry Kylene Ling
Project Manager, NEPA
Environmental Planning
Naval Facilities Engineering Systems Command, Hawai‘i
808.349.0929 (mobile)

From:	info@PMRF-KPGO-EIS.com
To:	Kamakana Ferreira
Cc:	Kaiali"i Kahele; Dan Ahuna; Dawn Chang (Guest); Wells, Kerry Kylene CIV USN (USA); Shari.A.Miller@nasa.gov; Michele Lefebvre
Subject:	Re: OHA Comment Re: PMRF Real Estate Renewal EIS
Date:	Monday, December 8, 2025 11:53:28 AM
Attachments:	DEIS OHA Response Letter.pdf

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha Stacy Ferreira, Ka Pouhana, Office of Hawaiian Affairs,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We are greatly appreciative of the comments OHA provided and are currently working to incorporate them into the Final EIS.

Please find attached a letter from our team that directs you to the ***Draft EIS Comment Summary Report*** and provides our team contact information should you have any further questions or require further information regarding the EIS.

Mahalo,

Kerry Kylene Ling
Project Manager, NEPA
Environmental Planning
Naval Facilities Engineering Systems Command, Hawaiʻi
808.349.0929 (mobile)

> On 08/07/2025 8:13 PM EDT Kamakana Ferreira <kamakanaf@oha.org> wrote:
>
> Aloha,
>
> Attached is an Office of Hawaiian Affairs (OHA) comment letter on the June 2025 Draft Environmental Impact Statement (DEIS) for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate renewal in Waimea, Kauaʻi. Naval Facilities Engineering Systems Command has prepared this DEIS on behalf of the Department of the Navy (DON) and the National Aeronautics and Space Administration (NASA) as required by Hawaiʻi Revised Statutes (HRS) 343 and the National Environmental Protection Act (NEPA).

These comments have also been submitted via the online comment portal (https://pmrf-kpgo-eis.com/comments/).

A hardcopy of the letter will be mailed out to you shortly. Please let me know if you have any questions.

Mahalo,

Kamakana C. Ferreira, M.A.

Compliance Archaeologist

Office of Hawaiian Affairs

560 N. Nimitz Hwy

Honolulu, Hi. 96817

(808)594-0227

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

December 5, 2025

Dear Stacy Ferreira, Ka Pouhana, Chief Executive Officer – Office of Hawaiian Affairs:

SUBJECT: Public Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōkeʻe Park Geophysical Observatory Real Estate Draft Environmental Impact Statement

The U.S. Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) appreciate the comments and feedback received from the public, state, and federal agencies as part of the public comment process for the Draft Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA), Hawaiʻi Revised Statutes (HRS) Chapter 343 (commonly known as the "Hawai'i Environmental Policy Act [HEPA]"), and as well as Section 106 of the National Historic Preservation Act and HRS Section 6E-42. As discussed at the public comment meetings, the Navy and NASA will prepare a Final EIS that evaluates the potential environmental consequences of the Navy's and NASA's proposal to retain 8,172 acres and 23 acres, respectively, of state lands presently utilized pursuant to leases and easements on Kauaʻi, for operational continuity and sustainment at the Pacific Missile Range Facility (PMRF), and NASA's continued operations, including measurements of the Earth's rotation and local land motion, at Kōkeʻe Park Geophysical Observatory (KPGO).

Proactive communication with the public and agencies throughout the EIS process is a high priority for the Navy and NASA. The public comment period for NEPA started on June 20, 2025, with the publication of the Notice of Availability (NOA) in the *Federal Register,* and for HEPA on June 23, 2025, with the publication of the Draft EIS in *The Environmental Notice*. The public comment period ended on August 7, 2025. The purpose of public involvement and outreach during the comment phase was to invite the public, elected officials, government agencies, nongovernmental organizations, Native Hawaiian Organizations, and all interested stakeholders to review and comment on the Draft EIS in accordance with NEPA and HEPA. One hundred and seventy-seven (177) comments were received during the public comment period.

Public comments on the Draft EIS are being reviewed and integrated into development of the Final EIS. The comments and insights provided during the comment period are valuable in shaping and refining the approach to analysis and assessing the potential environmental impacts of the Proposed Action. All comments received will be carefully considered in the development of the Final EIS, which is currently scheduled to be released in summer 2026.

The Draft EIS Public Comment Summary Report, which summarizes public comments received during the comment period can be found on the EIS website here: Draft EIS Comment Summary Report. The Final EIS will include detailed responses to all comments received during the public comment period. The Navy and NASA are committed to maintaining transparency throughout this process and will continue to meet regularly with federal, state, and local

agencies, as well as Kaua‘i community groups throughout development of the Final EIS.

Mahalo nui loa for your engagement and participation in the EIS process. The Navy and NASA look forward to continued collaboration as we advance through the EIS process. Should you have any further questions or require additional information, please do not hesitate to contact our team.

For more information, please visit the project website at **PMRF-KPGO-EIS.com**. If you would like to request a briefing with our Navy and NASA team, please contact the Navy NEPA Project Manager, Ms. Kerry Kylene Ling at **(808) 349-0929** or **Kerry.K.Wells.civ@us.navy.mil** or the NASA Goddard Center NEPA Project Manager, Ms. Shari Miller at **(757) 824-2327** or **Shari.A.Miller@nasa.gov**. Thank you for your interest in the project.

Sincerely,

Kerry Kylene Ling
NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai'i

Sincerely,

Shari Miller
NEPA Project Manager
NASA Goddard Space Flight Center

Distribution:
State of Hawai‘i Department of Health, Clean Water Branch
State of Hawai'i Department of Health, Clean Air Branch
State of Hawai‘i Office of Hawaiian Affairs
State of Hawai‘i Department of Land and Natural Resources (DLNR), Land Division
State of Hawai‘i DLNR Commission on Water Resource Management
State of Hawai‘i DLNR, Division of Aquatic Resources
State of Hawai‘i DLNR, Division of Forestry and Wildlife
State of Hawai‘i DLNR, Office of Conservation and Coastal Lands
State of Hawai‘i DLNR, State Historic Preservation Division
State of Hawai‘i DLNR, Division of State Parks
United States Environmental Protection Agency, Regions 9 and 10

From:	INFO@PMRF-KPGO-EIS.COM
To:	Sarvis, Luke J; Yasaka, Lauren E; dlnr.cwrm@hawaii.gov; dlnr.aquatics@hawaii.gov; sheri.S.Mann@hawaii.gov; kimberly.mills@hawaii.gov; jessica.puff@hawaii.gov; carl.e.sholin@hawaii.gov; Dawn Chang (Guest); Vierra, Dayna K
Cc:	Wells, Kerry Kylene CIV USN (USA); Shari.A.Miller@nasa.gov; Michele Lefebvre
Subject:	Re: Department of Land and Natural Resources Comments on PMRF KPGO DEIS
Date:	Monday, December 8, 2025 11:34:42 AM
Attachments:	DEIS DLNR Response Letter.pdf

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha State of Hawai‘i, Department of Land and Natural Resources – All Departments,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōke‘e Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We are greatly appreciative of the comments the DLNR Departments provided during their review of the Draft EIS. We would also like to thank Land Division team for the continued engagement and willingness to meet with our EIS team monthly during our scheduled drumbeats.

Please find attached a letter from our team that directs the agencies that provided comments (see distribution list on the letter) to the ***Draft EIS Comment Summary Report*** and provides them with our team contact information for any further questions or if they may require further information regarding the EIS.

Mahalo,

Kerry Kylene Ling
Project Manager, NEPA
Environmental Planning
Naval Facilities Engineering Systems Command, Hawai‘i
808.349.0929 (mobile)

> On 08/07/2025 7:59 PM EDT Sarvis, Luke J <luke.j.sarvis@hawaii.gov> wrote:
>
> Aloha,
>
> Please find attached the Department of Land and Natural Resources' comments on the U.S. Navy Pacific Missile Range Facility and NASA Kōkeʻe Park Geographical Observatory Real Estate Draft Environmental Impact Statement Located in Kekaha and Kōkeʻe on the Island of Kauaʻi Tax Map Key(s): (4) 1-2-001:006 (por.), (4) 1-2-001:010, (4) 1-2-002:001 (por.), (4) 1- 2-002:010 (por.), (4) 1-2-002:024 (por.), (4) 1-2-002:025, (4) 1-2-002:026, (4)1-2- 002:027, (4) 1-2-

002:028, (4) 1-2-002:029, (4) 1-2-016:011 (por.), (4) 1-4-001:002 (por.), (4) 1-4-001:013 (por.), (4) 1-4-001:014 (por.)

Mahalo,

Luke Sarvis

Office of the Chairperson

Department of Land and Natural Resources

1151 Punchbowl Street, Room 131

(808)291-5047

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

December 5, 2025

Dear State of Hawai‘i, Department of Land and Natural Resources – All Divisions:

SUBJECT: Public Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Draft Environmental Impact Statement

The U.S. Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) appreciate the comments and feedback received from the public, state, and federal agencies as part of the public comment process for the Draft Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA), Hawai‘i Revised Statutes (HRS) Chapter 343 (commonly known as the “Hawai’i Environmental Policy Act [HEPA]”), and as well as Section 106 of the National Historic Preservation Act and HRS Section 6E-42. As discussed at the public comment meetings, the Navy and NASA will prepare a Final EIS that evaluates the potential environmental consequences of the Navy’s and NASA’s proposal to retain 8,172 acres and 23 acres, respectively, of state lands presently utilized pursuant to leases and easements on Kaua‘i, for operational continuity and sustainment at the Pacific Missile Range Facility (PMRF), and NASA’s continued operations, including measurements of the Earth’s rotation and local land motion, at Kōke‘e Park Geophysical Observatory (KPGO).

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agencies, as well as Kaua‘i community groups throughout development of the Final EIS.

Mahalo nui loa for your engagement and participation in the EIS process. The Navy and NASA look forward to continued collaboration as we advance through the EIS process. Should you have any further questions or require additional information, please do not hesitate to contact our team.

For more information, please visit the project website at **PMRF-KPGO-EIS.com**. If you would like to request a briefing with our Navy and NASA team, please contact the Navy NEPA Project Manager, Ms. Kerry Kylene Ling at **(808) 349-0929** or **Kerry.K.Wells.civ@us.navy.mil** or the NASA Goddard Center NEPA Project Manager, Ms. Shari Miller at **(757) 824-2327** or **Shari.A.Miller@nasa.gov**. Thank you for your interest in the project.

Sincerely,

Kerry Kylene Ling
NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai'i

Sincerely,

Shari Miller
NEPA Project Manager
NASA Goddard Space Flight Center

Distribution:
State of Hawai‘i Department of Health, Clean Water Branch
State of Hawai'i Department of Health, Clean Air Branch
State of Hawai‘i Office of Hawaiian Affairs
State of Hawai‘i Department of Land and Natural Resources (DLNR), Land Division
State of Hawai‘i DLNR Commission on Water Resource Management
State of Hawai‘i DLNR, Division of Aquatic Resources
State of Hawai‘i DLNR, Division of Forestry and Wildlife
State of Hawai‘i DLNR, Office of Conservation and Coastal Lands
State of Hawai‘i DLNR, State Historic Preservation Division
State of Hawai‘i DLNR, Division of State Parks
United States Environmental Protection Agency, Regions 9 and 10

From:	info@PMRF-KPGO-EIS.com
To:	Alison Togioka; Kaulana.k.mossman2.civ@us.navy.mil
Cc:	Troy Tanigawa; Boyd Gayagas; Michael Moule; Bryan Wienand; Reiko Matsuyama; Wells, Kerry Kylene CIV USN (USA); Shari.A.Miller@nasa.gov; Michele Lefebvre
Subject:	Re: PMRF Comments - County of Kauai, Department of Public Works
Date:	Monday, December 8, 2025 11:18:02 AM
Attachments:	DEIS DPW Response Letter.pdf

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha Alison Togioka and Michael Moule, P.E.,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We appreciate the comments you provided.

Please find attached a letter from our team that directs you to the Draft EIS Comment Summary Report and provides our team contact information should you have any further questions or require further information regarding the EIS.

Mahalo,

Kerry Kylene Ling
Project Manager, NEPA
Environmental Planning
Naval Facilities Engineering Systems Command, Hawaiʻi
808.349.0929 (mobile)

> On 08/07/2025 7:31 PM EDT Alison Togioka <atogioka@kauai.gov> wrote:
>
> Aloha~
>
> Attached are our comments for the draft EIS for PMRF.
>
> Please review and let us know if you should have any questions.
>
> Mahalo!

Alison Togioka

Department of Public Works

4444 Rice Street, Suite 275

Līhu‘e Hawai‘i 96766

Phone: (808)241-4996

Email: atogioka@kauai.gov

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

December 5, 2025

Dear Alison Togioka and Michael Moule, P.E., County of Kaua‘i, Department of Public Works:

SUBJECT: Public Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Draft Environmental Impact Statement

The U.S. Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) appreciate the comments and feedback received from the public, state, and federal agencies as part of the public comment process for the Draft Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA), Hawai‘i Revised Statutes (HRS) Chapter 343 (commonly known as the “Hawai’i Environmental Policy Act [HEPA]”), and as well as Section 106 of the National Historic Preservation Act and HRS Section 6E-42. As discussed at the public comment meetings, the Navy and NASA will prepare a Final EIS that evaluates the potential environmental consequences of the Navy’s and NASA’s proposal to retain 8,172 acres and 23 acres, respectively, of state lands presently utilized pursuant to leases and easements on Kaua‘i, for operational continuity and sustainment at the Pacific Missile Range Facility (PMRF), and NASA’s continued operations, including measurements of the Earth’s rotation and local land motion, at Kōke‘e Park Geophysical Observatory (KPGO).

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agencies, as well as Kaua‘i community groups throughout development of the Final EIS.

Mahalo nui loa for your engagement and participation in the EIS process. The Navy and NASA look forward to continued collaboration as we advance through the EIS process. Should you have any further questions or require additional information, please do not hesitate to contact our team.

For more information, please visit the project website at **PMRF-KPGO-EIS.com**. If you would like to request a briefing with our Navy and NASA team, please contact the Navy NEPA Project Manager, Ms. Kerry Kylene Ling at **(808) 349-0929** or **Kerry.K.Wells.civ@us.navy.mil** or the NASA Goddard Center NEPA Project Manager, Ms. Shari Miller at **(757) 824-2327** or **Shari.A.Miller@nasa.gov**. Thank you for your interest in the project.

Sincerely,

Kerry Kylene Ling
NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai'i

Sincerely,

Shari Miller
NEPA Project Manager
NASA Goddard Space Flight Center

Distribution:
State of Hawai‘i Department of Health, Clean Water Branch
State of Hawai'i Department of Health, Clean Air Branch
State of Hawai‘i Office of Hawaiian Affairs
State of Hawai‘i Department of Land and Natural Resources (DLNR), Land Division
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State of Hawai‘i DLNR, Office of Conservation and Coastal Lands
State of Hawai‘i DLNR, State Historic Preservation Division
State of Hawai‘i DLNR, Division of State Parks
United States Environmental Protection Agency, Regions 9 and 10

From:	info@PMRF-KPGO-EIS.com
To:	Appleton, ZAC; William.Manley.civ@us.navy.mil
Cc:	Shari.A.Miller@nasa.gov; Wells, Kerry Kylene CIV USN (USA); Michele Lefebvre
Subject:	Re: EPA Comment Letter: Pacific Missile Range Facility DEIS
Date:	Monday, December 8, 2025 11:12:38 AM
Attachments:	DEIS EPAR9 Response Letter.pdf

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha Zac Appleton,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We appreciate the comments you provided.

Please find attached a letter from our team that directs you to the Draft EIS Comment Summary Report and provides our team contact information should you have any further questions or require further information regarding the EIS.

Mahalo,

Kerry Kylene Ling
Project Manager, NEPA
Environmental Planning
Naval Facilities Engineering Systems Command, Hawaiʻi
808.349.0929 (mobile)

> On 08/05/2025 7:53 PM EDT Appleton, ZAC <appleton.zac@epa.gov> wrote:
>
> If you have any questions over EPA’s comment letter, feel free to contact me directly.
>
> Thanks,
>
> Zac Appleton
>
> NEPA Reviewer
>
> U.S. Environmental Protection Agency, Region 9
> Environmental Review Section – Transportation Team

75 Hawthorne Street, CED 2-2

San Francisco, CA 94105

Phone: 415-972-3321

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

December 5, 2025

Dear Zac Appleton, U.S. Environmental Protection Agency, Region 9:

SUBJECT: Public Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōkeʻe Park Geophysical Observatory Real Estate Draft Environmental Impact Statement

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For more information, please visit the project website at **PMRF-KPGO-EIS.com**. If you would like to request a briefing with our Navy and NASA team, please contact the Navy NEPA Project Manager, Ms. Kerry Kylene Ling at **(808) 349-0929** or **Kerry.K.Wells.civ@us.navy.mil** or the NASA Goddard Center NEPA Project Manager, Ms. Shari Miller at **(757) 824-2327** or **Shari.A.Miller@nasa.gov**. Thank you for your interest in the project.

Sincerely,

Kerry Kylene Ling
NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai'i

Sincerely,

Shari Miller
NEPA Project Manager
NASA Goddard Space Flight Center

Distribution:
State of Hawai‘i Department of Health, Clean Water Branch
State of Hawai'i Department of Health, Clean Air Branch
State of Hawai‘i Office of Hawaiian Affairs
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State of Hawai‘i DLNR Commission on Water Resource Management
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State of Hawai‘i DLNR, Office of Conservation and Coastal Lands
State of Hawai‘i DLNR, State Historic Preservation Division
State of Hawai‘i DLNR, Division of State Parks
United States Environmental Protection Agency, Regions 9 and 10

From:	info
To:	Cori China; Wells, Kerry Kylene CIV USN (USA); Shari.A.Miller@nasa.gov; Michele Lefebvre
Subject:	Re: United States Navy Pacific Missile Range Facility and NASA Kokee Park Geophysical Observatory Real Estate DEIS
Date:	Monday, December 8, 2025 10:56:46 AM
Attachments:	DEIS HIDOE Response Letter.pdf

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha Cori China and Roy Ikeda,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We appreciate the reference to the comments you provided during the scoping period.

Please find attached a letter from our team that directs you to the Draft EIS Comment Summary Report and provides our team contact information should you have any further questions or require further information regarding the EIS.

Mahalo,

Kerry Kylene Ling
Project Manager, NEPA
Environmental Planning
Naval Facilities Engineering Systems Command, Hawaiʻi
808.349.0929 (mobile)

> On 07/23/2025 3:39 PM EDT Cori China <cori.china@k12.hi.us> wrote:
>
> Good morning,
>
> Please refer to the attached letter for comments from the Hawaii State Department of Education regarding the subject matter.
>
> Thank you.
>
> Best regards,
> Cori China
> Hawaii State Department of Education
> Office of Facilities and Operations
> Facilities Development Branch, Planning Section
> 3633 Waialae Avenue, Room C209

Honolulu, HI 96816
Phone: (808) 784-5080

This is a staff email account managed by Hawaii Department Of Education School District. This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the sender.

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

December 5, 2025

Dear Cori China, Hawai‘i State Department of Education:

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agencies, as well as Kaua‘i community groups throughout development of the Final EIS.

Mahalo nui loa for your engagement and participation in the EIS process. The Navy and NASA look forward to continued collaboration as we advance through the EIS process. Should you have any further questions or require additional information, please do not hesitate to contact our team.

For more information, please visit the project website at **PMRF-KPGO-EIS.com**. If you would like to request a briefing with our Navy and NASA team, please contact the Navy NEPA Project Manager, Ms. Kerry Kylene Ling at **(808) 349-0929** or **Kerry.K.Wells.civ@us.navy.mil** or the NASA Goddard Center NEPA Project Manager, Ms. Shari Miller at **(757) 824-2327** or **Shari.A.Miller@nasa.gov**. Thank you for your interest in the project.

Sincerely,

Kerry Kylene Ling
NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai'i

Sincerely,

Shari Miller
NEPA Project Manager
NASA Goddard Space Flight Center

Distribution:
State of Hawai‘i Department of Health, Clean Water Branch
State of Hawai'i Department of Health, Clean Air Branch
State of Hawai‘i Office of Hawaiian Affairs
State of Hawai‘i Department of Land and Natural Resources (DLNR), Land Division
State of Hawai‘i DLNR Commission on Water Resource Management
State of Hawai‘i DLNR, Division of Aquatic Resources
State of Hawai‘i DLNR, Division of Forestry and Wildlife
State of Hawai‘i DLNR, Office of Conservation and Coastal Lands
State of Hawai‘i DLNR, State Historic Preservation Division
State of Hawai‘i DLNR, Division of State Parks
United States Environmental Protection Agency, Regions 9 and 10

From: info@PMRF-KPGO-EIS.com
To: Kaneshiro, Michael; Wells, Kerry Kylene CIV USN (USA); Shari.A.Miller@nasa.gov; Michele Lefebvre
Subject: Re: CWB Comments on PMRF and NASA"s Koke"e Park Geophysical Observatory Real Estate Draft EIS
Date: Monday, December 8, 2025 10:48:38 AM
Attachments: DEIS CWB Response Letter.pdf

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha Mr. Mike Kaneshiro,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We appreciate the CWB memorandum and standard project comments you provided.

Please find attached a letter from our team that directs you to the Draft EIS Comment Summary Report and provides our team contact information should you have any further questions or require further information regarding the EIS.

Mahalo,

Kerry Kylene Ling
Project Manager, NEPA
Environmental Planning
Naval Facilities Engineering Systems Command, Hawaiʻi
808.349.0929 (mobile)

> On 06/24/2025 6:12 PM EDT Kaneshiro, Michael <michael.kaneshiro@doh.hawaii.gov> wrote:
>
> Aloha Ms. Kerry Ling,
>
> Thank you for your email to the Clean Water Branch with the subject:
>
> United States (U.S.) Navy Pacific Missile Range Facility and the National Aeronautics and Space Administration (NASA)
> Koke'e Park Geophysical Observatory Real Estate Draft Environmental Impact Statement, Kaua' i, Hawai' i;
> Tax Map Keys:
> (4) 1-2-00 I :006 (por.),
> (4) 1-2-00 I :0 I 0,
> (4) 1-2-002:00 I (por.),
> (4) 1-2-002:0 IO (por.), (4) 1-2-002:024 (por.),
> (4) 1-2-002:025,
> (4) 1-2-002:026,
> (4) 1-2-002:027,
> (4) 1-2-002:028,

(4) 1-2-002:029,
(4) 1-2-0 16:01 1 (por.),
(4) 1-4-00 I :002 (por.),
(4) 1-4-00I :0 13 (por.),
(4) 1-4-00 I:014 (por.)

The CWB Standard Project Comments Memorandum-for-CWB-Standard-Project-Comments-07016CMHK.23-part-1-signed.pdf (hawaii.gov) are for agencies and project owners who are soliciting comments in fulfillment of their environmental review process. I have also enclosed CWB's memorandum for your convenience. As mentioned in the memorandum, CWB no longer responds to every solicitation for comments. Instead, CWB offers the enclosed standard project comments which you may use as part of your environmental review process. Please let me know if you have any questions.

Mahalo,
Mike Kaneshiro

Engineer | Environmental Management Division | Clean Water Branch

Hawaii State Department of Health | Ka 'Oihana Olakino

2827 Waimano Home Road #225 | Pearl City, HI 96782

Office: (808) 586-4309

https://health.hawaii.gov/cwb/

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DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

December 5, 2025

Dear Mr. Mike Kaneshiro, Hawai‘i State Department of Health - Clean Water Branch:

SUBJECT: Public Comments Received for U.S. Navy Pacific Missile Range Facility and National Aeronautics and Space Administration Kōke‘e Park Geophysical Observatory Real Estate Draft Environmental Impact Statement

The U.S. Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) appreciate the comments and feedback received from the public, state, and federal agencies as part of the public comment process for the Draft Environmental Impact Statement (EIS) pursuant to the National Environmental Policy Act (NEPA), Hawai‘i Revised Statutes (HRS) Chapter 343 (commonly known as the “Hawai’i Environmental Policy Act [HEPA]”), and as well as Section 106 of the National Historic Preservation Act and HRS Section 6E-42. As discussed at the public comment meetings, the Navy and NASA will prepare a Final EIS that evaluates the potential environmental consequences of the Navy’s and NASA’s proposal to retain 8,172 acres and 23 acres, respectively, of state lands presently utilized pursuant to leases and easements on Kaua‘i, for operational continuity and sustainment at the Pacific Missile Range Facility (PMRF), and NASA’s continued operations, including measurements of the Earth’s rotation and local land motion, at Kōke‘e Park Geophysical Observatory (KPGO).

Proactive communication with the public and agencies throughout the EIS process is a high priority for the Navy and NASA. The public comment period for NEPA started on June 20, 2025, with the publication of the Notice of Availability (NOA) in the *Federal Register,* and for HEPA on June 23, 2025, with the publication of the Draft EIS in *The Environmental Notice*. The public comment period ended on August 7, 2025. The purpose of public involvement and outreach during the comment phase was to invite the public, elected officials, government agencies, nongovernmental organizations, Native Hawaiian Organizations, and all interested stakeholders to review and comment on the Draft EIS in accordance with NEPA and HEPA. One hundred and seventy-seven (177) comments were received during the public comment period.

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agencies, as well as Kaua‘i community groups throughout development of the Final EIS.

Mahalo nui loa for your engagement and participation in the EIS process. The Navy and NASA look forward to continued collaboration as we advance through the EIS process. Should you have any further questions or require additional information, please do not hesitate to contact our team.

For more information, please visit the project website at **PMRF-KPGO-EIS.com**. If you would like to request a briefing with our Navy and NASA team, please contact the Navy NEPA Project Manager, Ms. Kerry Kylene Ling at **(808) 349-0929** or **Kerry.K.Wells.civ@us.navy.mil** or the NASA Goddard Center NEPA Project Manager, Ms. Shari Miller at **(757) 824-2327** or **Shari.A.Miller@nasa.gov**. Thank you for your interest in the project.

Sincerely,

Kerry Kylene Ling
NEPA Project Manager
Naval Facilities Engineering Systems Command, Hawai'i

Sincerely,

Shari Miller
NEPA Project Manager
NASA Goddard Space Flight Center

Distribution:
State of Hawai‘i Department of Health, Clean Water Branch
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State of Hawai‘i DLNR, Office of Conservation and Coastal Lands
State of Hawai‘i DLNR, State Historic Preservation Division
State of Hawai‘i DLNR, Division of State Parks
United States Environmental Protection Agency, Regions 9 and 10

From:	info@PMRF-KPGO-EIS.com
To:	DOH.CABPASS; Wells, Kerry Kylene CIV USN (USA); Shari.A.Miller@nasa.gov; Michele Lefebvre
Subject:	Re: Draft Environmental Impact Statement of Pacific Missile Range Facility and Kōkeʻe Park Geophysical Observatory Real Estate
Date:	Monday, December 8, 2025 10:40:06 AM
Attachments:	DEIS CAB Response Letter.pdf

Caution: This email originated from outside of Stantec GS Inc. Please take extra precaution.

Aloha Lisa Kitahara,

On behalf of the United States (U.S.) Department of the Navy (Navy) and the National Aeronautics and Space Administration (NASA) Environmental Impact Statement (EIS) project team for the Pacific Missile Range Facility (PMRF) and Kōkeʻe Park Geophysical Observatory (KPGO) Real Estate Environmental Impact Statement (EIS), mahalo nui loa for your engagement and participation in the EIS process. We greatly appreciate the comments you provided.

Please find attached a letter from our team that directs you to the Draft EIS Comment Summary Report and provides our team contact information should you have any further questions or require further information regarding the EIS.

Mahalo,

Kerry Kylene Ling

Project Manager, NEPA

Environmental Planning

Naval Facilities Engineering Systems Command, Hawaiʻi

808.349.0929 (mobile)

> On 06/24/2025 5:44 PM EDT DOH.CABPASS <doh.cabpass@doh.hawaii.gov> wrote:

Draft Environmental Impact Statement of

Pacific Missile Range Facility and Kōke‘e Park Geophysical Observatory Real Estate Vol 1, Appendices Vol 2., Appendices Vol 3., Appendices Vol 4., and the Public Scoping Meeting Audio Recording in the June 23, 2025 edition of the TENs.

https://health.hawaii.gov/cab/clean-air-branch/standard-comments-for-land-use-reviews/

Lisa Kitahara

Planning & Administrative Support Staff Supervisor | Clean Air Branch

Hawai’i State Department of Health | Ka ‘Oihana Olakino

2827 Waimano Home Road #130 | Pearl City, Hawaii 96782

Office: (808) 586-4200

DEPARTMENT OF THE NAVY
COMMANDER, PACIFIC MISSILE RANGE FACILITY

NATIONAL AERONAUTICS AND SPACE ADMINISTRATION
GODDARD SPACE FLIGHT CENTER

December 5, 2025

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Naval Facilities Engineering Systems Command, Hawai'i

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