Integrated Cultural Resources Management Plan Hawai'i Army National Guard Installation

Final Environmental Assessment

September 2008



Prepared for: National Guard Bureau





Prepared by: Hawai'i Army National Guard Environmental Office THIS PAGE INTENTIONALLY LEFT BLANK

Document Information

AUTHORITY: National Environmental Policy Act (NEPA) of 1969, 32 CFR 651, Environmental Analysis of Army Actions, "Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with the National Environmental Policy Act of 1969 (Mar 02)", and State Hawai'i Environmental Assessment laws (Hawai'i Revised Statutes, Chapter 343).

LEAD AGENCY: National Guard Bureau

TITLE OF PROPOSED ACTION: Implementation of the Hawai'i Army National Guard Integrated Cultural Resources Management Plan, 2008 - 2012

AFFECTED JURISDICTION: State of Hawai'i

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DOCUMENT DESIGNATION: Environmental Assessment

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DRAFT FINDING OF NO SIGNIFICANT IMPACT ENVIRONMENTAL ASSESSMENT FOR IMPLEMENTATION OF AN INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN AT HAWAII ARMY NATIONAL GUARD FACILITIES

INTRODUCTION

The Hawaii Army National Guard (HIARNG) prepared an Environmental Assessment (EA) to identify and evaluate the potential environmental effects of implementing an Integrated Cultural Resources Management Plan (ICRMP) at facilities throughout Hawai'i. The HIARNG prepared the EA in accordance with the National Environmental Policy Act (NEPA) (42 *United States Code* (USC) 4321 to 4370e), the Council on Environmental Quality (CEQ) regulations for Implementing the Procedural Provisions of NEPA (CEQ regulations, 40 CFR Parts 1500 –1508), and *Environmental Analysis of Army Actions* (32 CFR 651).

1. Description of Proposed Action and Alternatives

Proposed Action. The HIARNG proposes to implement the ICRMP for its facilities in Hawai'i during fiscal years 2008 through 2012. Department of Defense Instruction 4715.3, *Environmental Conservation Program*, and Army Regulation (AR) 200-1, *Environmental Protection and Enhancement*, require development of an ICRMP. The ICRMP establishes explicit responsibilities, standard operating procedures (SOPs), and long-range goals for managing cultural resources at HIARNG lands, in compliance with all applicable laws and regulations, while ensuring the safety and efficiency of federal and state missions. Cultural resources include historic properties, cultural items, Native Hawaiian sacred sites, collections, and archaeological resources. The Proposed Action is the HIARNG's Preferred Alternative.

Alternatives Considered. In addition to the Proposed Action, the HIARNG analyzed a No-Action Alternative. Current cultural resources management measures would remain in effect under the No-Action Alternative, but there would be no comprehensive plan to integrate mission needs with cultural resources protection. The No-Action Alternative is not viable to the HIARNG because it does not meet the requirements of AR 200-1 and DODI 4715.3. An environmental analysis of a No-Action Alternative is required by CEQ regulations to serve as a benchmark against which the Proposed Action can be evaluated.

2. Environmental Analysis

Based upon the analysis contained in the EA, it has been determined that the known and potential impacts of the Proposed Action on the physical, cultural, and natural environment would be minor and generally positive. Implementation of the HIARNG's ICRMP would result in the efficient management of cultural resources at HIARNG facilities. The goals included in the ICRMP require integration with natural resources, military training, and facilities management. As a result, all cultural, natural, and human resources under the HIARNG's control will receive more consideration and protection than previously afforded. Implementation of the Proposed Action would not result in substantial adverse environmental effects.

Neither the Proposed Action nor the No-Action Alternative creates disproportionately high or adverse human health or environmental effects on children, minority or low-income populations, or communities at, or surrounding, the HIARNG facilities.

The following resource areas were assessed for both alternatives: land use, location and mission, air quality, noise, geology, soils, climate, biological and water resources, cultural resources, and socio-economics. The HIARNG found no major impacts on these resources as a result of implementing the ICRMP; however, minor, localized, short-term disturbance to air quality and soils, as well as noise impacts, may be associated with field activities such as ground surveying, fence building, subsurface testing and data recovery, new construction and maintenance of historic structures, and demolition.

3. Regulations

The Proposed Action would not violate any federal, state, or local environmental regulations. This EA meets the requirements of NEPA, its regulations promulgated by the CEQ, and *Environmental Analysis of Army Actions*.

4. Commitment to Implementation

The National Guard Bureau (NGB) and HIARNG affirm their commitment to implement this EA in accordance with NEPA. Implementation of the Proposed Action is dependent on funding. The HIARNG and the NGB's Environmental Programs Division will ensure that adequate funds are requested in future years' budgets to achieve the goals and objectives set forth in this EA.

5. Public Review and Comment

The draft ICRMP and EA were made available for public review and comment from April 9 to May 8, 2007. The announcement of the availability of the documents was published on Sunday, April 9 in the following newspapers:

The Honolulu Advertiser Honolulu Star Bulletin The Moloka'i Island Times The Maui News Hawaii Tribune Herald West Hawaii Today The Garden Island

Electronic and paper copies of these documents were made available at the HIARNG environmental office, and at the following libraries:

Hawai'i State Library (O'ahu) Kane'ohe Public Library (O'ahu) Pearl City Public Library (O'ahu) Kaimuki Public Library (O'ahu) Lihu'e Public Library (Kaua'i) Moloka'i Public Library (Moloka'i) Kahului Public Library (Maui) Hilo Public Library (Hawai'i) Kailua-Kona Public Library (Hawai'i)

The draft public comment period ended May 8, and 16 comments (from 3 response letters) were received relating to the ICRMP, and 3 comments (from 2 response letters) specifically commented on the draft EA.

The final ICRMP/EA and draft Finding of No Significant Impacts (FNSI) will be available for public review and comment for 30 days after publication of the notice of availability. The final ICRMP/EA and draft FNSI will be available for review at locations listed in the notice of availability. Written comments may be submitted to the HIARNG, Environmental Office, ATTN: Ms. Angela Kieran-Vast, 3949 Diamond Head Rd., Honolulu, HI 96816.

6. Finding of No Significant Impact

Based on the information presented in the final EA, the HIARNG proposes to implement the Preferred Alternative. Once public comments have been addressed and if a determination is made that the Proposed Action will have no significant impact, the FNSI will be signed and the action will be implemented. The requirements of NEPA and the CEQ regulations will have been met. An Environmental Impact Statement will not be prepared, and the National Guard Bureau will issue this FNSI.

Jeffrey G. Phillips Colonel, US Army Chief, Environmental Programs Division

Date

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Chapter 1. Purpose and Need for the Proposed Action

1.1 Introduction

The Hawai'i Army National Guard (HIARNG) proposes to implement the statewide Integrated Cultural Resource Management Plan (ICRMP) on 16 facilities totaling approximately 1293 acres. The term "installation" refers to the 16 facilities located on five islands within the state of Hawai'i. If implemented the ICRMP would cover the planning period from fiscal year 2008 (FY08) through 2012 (FY12). The ICRMP is an overall cultural resources management plan that supports the HIARNG military mission by integrating the concerns and goals of resource management with mission and land use activities. It provides a single point of reference for cultural resources issues for HIARNG land managers and military trainers in support of the military mission.

The ICRMP, mandated by Army Regulation (AR) 200-1 and (DA PAM) 200-4, integrates the "cultural landscape" approach with the Army's Integrated Training Area Management (ITAM) program and Ecosystem Management. The ITAM, Cultural Resources, and Ecosystem Management programs ensure sustainable use of training lands in the presence of archaeological or historic sites, while maintaining and improving environmental resources and addressing public concerns.

The National Environmental Policy Act (NEPA) of 1969 requires federal agencies to consider the potential environmental consequences of a proposed action in the decision making process. This process is outlined in Council on Environmental Quality (CEQ) guidelines (40 CFR 1500-1508), in 32 CFR Part 651, *Environmental Analysis of Army Actions*, and in "Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with the National Environmental Policy Act of 1969 (Jun 06)". The intent of NEPA is to protect, restore, and enhance the environment through well-informed federal decisions. In addition, actions involving the use of state lands in Hawai'i require documentation similar to NEPA under Chapter 343, Hawai'i Revised Statutes (HRS 343). This document addresses these requirements, and was used to determine whether significant adverse impacts would require the preparation of an Environmental Impact Statement.

1.2 Purpose and Need

The purpose of the proposed action is to carry out the set of cultural resource-specific management measures developed in the ICRMP. Implementation of the proposed action would support the HIARNG's requirement to maintain mission readiness, and ensure that cultural resources at HIARNG's 16 installations are effectively managed pursuant to AR 200-1. Cultural resources are defined by AR 200-1 as "historic properties...cultural items...archaeological resources...sacred sites... and collections" Historic properties are "any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the National Register of Historic Places, including artifacts, records, and material remains relation to such a resource." Cultural items are "human remains and associated funerary objects, unassociated funerary objects, sacred objects, and cultural patrimony. Archaeological resources are "any material remains of past human life or activities which are of archaeological interest." Sacred sites are "any specific, discrete, narrowly delineated

location on Federal land that is identified by an Indian tribe...or individual...as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion. The ICRMP is needed to protect, preserve, maintain, restore, enhance cultural resources and archaeological sites, and to assure compliance with all applicable regulations that protect cultural resources. There is currently no comprehensive management plan for cultural resources on HIARNG facilities.

1.3 Scope of the Document

This EA assesses the potential environmental and socio-economic impacts associated with implementing the ICRMP in the proposed areas and the impacts associated with the "no-action" alternative of maintaining existing conditions (i.e., not implementing the ICRMP). The outline and content of the EA have been prepared in accordance with "Guidance on Preparing Environmental Documentation for Army National Guard Actions in Compliance with the National Environmental Policy Act of 1969 (Jun 06)". The environmental and socio-economic resources addressed in this EA are described in Chapter 4, along with potential effects of implementing the ICRMP or the No Action Alternative. Since the specific proposed actions and detailed site descriptions are contained in the ICRMP, this document is an integral part of the Environmental Assessment.

1.4 Agency and Public Participation

All persons and organizations that have a potential interest in the proposed actions, including Native Hawaiian groups and minority, low income, or disadvantaged individuals, are urged to participate in the decision making process.

An earlier (2001) draft ICRMP and draft EA were prepared and sent out for public review. The only substantive comments received were from the Department of the Navy, Pacific Division, Naval facilities Engineering Command. These comments related to jurisdiction and operating procedures for managing cultural resources during the transfer of the Kalaeloa facility from the Navy to HIARNG that was ongoing at the time. These issues were resolved with the completion of the transfer in 2002, and are no longer relevant.

The preparation of the ICRMP and this EA was in coordination with appropriate federal state and local agencies. In addition, agency and public input are being obtained during two 30day public comment periods. The initial public comment period was held following completion of the revised draft ICRMP and draft EA, from April 8 to May 8, 2006. Sixteen comments were received on the draft ICRMP and 3 comments on the draft EA. The EA concludes that there are no significant impacts, and a draft FNSI has been issued along with this final EA. These are being made available for another 30-day public comment period. Notices of public comment periods and availability of the documents are being advertised in the Environmental Notice and through the local news media. Appendix B includes consultation letters sent to US Fish and Wildlife Service and the State Historic Preservation Division. Appendix C includes a copy of notices, all correspondence, comments on the draft EA. The comments from the public have been incorporated into the ICRMP.

The decision maker for this proposed action will be the Chief of the Environmental Programs Division of the National Guard Bureau in Arlington, VA.

Chapter 2. Description of the Proposed Action

The proposed action is to implement the ICRMP on 16 facilities comprising 1,292 acres owned by the State of Hawai'i or other military branches, and controlled by the Hawai'i Army National Guard via Executive Order or other permanent tenure. These facilities are located on five islands and include: Keaukaha Military Reservation (KMR), , Kea'au Armory, and Kealakekua Armory (Hawai'i); Paukukalo OMS#3, Pu'unene Armory, and Ukumehame Firing Range (Maui); Kaunakakai Armory & OMS #4, (Moloka'i); Bellows Regional Training Institute (RTI), Fort Ruger/Diamond Head Crater, Wheeler Army Air Field (WAAF), Wahiawa Armory & OMS #2, Waiawa Gulch UTES, and Kalaeloa (O'ahu); Hanapepe Armory & OMS #5, Kapa'a Armory, and Kekaha Firing Range (Kaua'i). These areas require management due to the sensitivity of the cultural resources, impacts of training on resources, and longterm commitments to the resources on these facilities.

The ICRMP evaluated in this EA covers the planning period from FY08 to FY12, and integrates the "cultural landscape approach" that includes the Army environmental programs: Integrated Training Area Management (ITAM), Environmental Awareness, and Ecosystem Management. Implementation of the ICRMP involves the determination of historic period of buildings, significance of the resources on each facility for inclusion on the National Register of Historic Places, and SOPs for reducing impacts. Federal and State regulations that the ICRMP will comply with are listed below:

- Army Regulation 200-1
- Department of Defense Instruction 4715.3
- National Historic Preservation Act of 1966 (as amended)
- Archaeological Resources Protection Act
- Antiquities Act of 1906
- American Indian Religious Freedom Act
- Native American Graves Protection and Repatriation Act
- Executive Order 13007 (Sacred Sites)
- Executive Order 13175 (Government to Government Consultation)
- Hawai'i Revised Statutes Title 13 Chapter 6

2.1 Mission and Location

The HIARNG has dual state and federal missions:

- to provide a trained and ready force to serve in support of national military strategies; and,
- to assist civil authorities to protect life, property, and to preserve order and public safety.

In 1996, HIARNG's federal mission called for deployment of soldiers to assist in peacekeeping activities in the eastern European countries of Croatia and Bosnia-Herzegovina. From 2003 to the present, HIARNG units continue their federal combat missions in theaters of operation that include the Middle Eastern countries of Afghanistan and Iraq. At the state level, the HIARNG conducts joint emergency operations with the State Civil Defense and the Hawai'i Air National Guard when responding to natural disasters such as tsunamis and hurricanes.

This management plan encompasses 16 HIARNG sites statewide (see Figure 2.1). These include headquarters, military reservations, facilities, armories, and a variety of support facilities. The Cultural Resource Program must manage a diverse array of resources at these sites, including archaeological sites, historic buildings, cemeteries, traditional cultural places (TCP's), and Cold War resources.



Figure 2.1: Area location map

HIARNG controls these sites via Gubernatorial Executive Order, or via lease agreements from other state agencies, federal agencies and private parties. Unique features—including Native Hawaiian prehistoric and historic cultural sites—exist on the acreage that HIARNG uses throughout the Hawaiian Islands.

2.2 Cultural Resources Management

Cultural resources have been a focus of the Department of Defense since the 1980's when the military mission came to include stewardship of these resources. As the nation's third largest federal landowner, the DoD has substantial land management responsibilities. However, reductions in force structure have led to a decline in land available for training and put greater pressure on remaining areas. Furthermore, many armories constructed in the 1950's, when the HIARNG became stewards of a variety of properties, are aging rapidly, reducing opportunities for preparedness and realistic training exercises.

Army Regulation 200-1 calls for matching military mission activities with the ecological compatibility of the land and cultural resources in order to maintain current and future training priorities, while minimizing adverse impact. The purpose of cultural resources management program is to preserve, restore, and maintain the historic and cultural environment by: 1) administering the cultural resources under HIARNG control in the spirit of stewardship; 2) initiating measures necessary to direct policies, plans, and programs in such a way that the federal and state owned sites, structures, and objects of historical, architectural, and archaeological significance are preserved, restored, or maintained for the inspiration and benefit of the people; and by 3) consulting with the Advisory Council on Historic Preservation (16 USC 470i), the Department of Land and Natural Resources (DLNR), and the State Historic Preservation Division (SHPD) to plan, develop, prepare, and implement procedures to insure that the programs contribute to the preservation and enhancement of these resources. To this end, the location, inventory, and nomination are integral parts of the program.

Nationwide, the Army's cultural landscape approach includes management of diverse cultural resources for multiple-uses including training, community outreach, out-leasing, and outdoor recreation. This approach balances conservation, adaptive re-use, new military construction (MILCON), and maintenance through the use of standard operating procedures (SOPs) that include baseline inventories, management planning, monitoring for human impacts to resources, and economic analysis. The program objective is to identify and mediate impediments to the military's primary mission to train, while reducing impacts to the environment, cultural resources, and to historic sites.

2.3 Environmental Awareness

Environmental Awareness is a program that promotes environmental stewardship and responsible use of cultural resources by HIARNG members (soldiers and civilians), as well as by the public. The Environmental Awareness program educates military and non-military members (soldiers, trainers, school, and community groups) through various communication forums. Information on historic buildings, Native Hawaiian prehistoric and historic archaeological sites, WWII historic sites, protected species and habitat, hazardous material spill prevention, and training site management efforts are provided to training site users through training classes, posters, and handbooks, and to the local community through local newspapers, television, radio, and seminars.

2.4 Plan Implementation

Implementation of the ICRMP would be realized through:

- 1. Satisfying existing and projected environmental staffing needs
- 2. Accomplishment of the goals and objectives of the ongoing cultural resources programs directly tied to the ICRMP as discussed above for the planning period.

2.4.1 Staffing

A minimum of one full-time staff position would be required for implementation of the ICRMP. HIARNG will rely on additional in-house and contract support to achieve specific goals and site projects listed in the ICRMP. Staff members that would be required to implement the ICRMP include:

- Conservation Manager
- Cultural Resources/Historical Research Associate
- Integrated Training Area (ITAM) Manager
- NEPA Administrator
- GIS Associate

2.4.2 The Plan

The ICRMP is the necessary authority to protect and manage cultural resources on the installation. The plan would be updated yearly to ensure accuracy, and revised every five years. Data and findings from the implementation of the SOPs would be reviewed, updated, and incorporated into the ICRMP as needed. The main components of the plan are listed here, and covered in detail in Chapter 7 of the ICRMP:

- Identification of all applicable legal requirements and procedures for integrating compliance between the various independent cultural resources legal requirements.
- Identification of specific actions, projects, and undertakings projected over a 5year period.
- Development and implementation of a landscape approach to installation cultural resources management.
- An updated planning level survey that includes existing information on cultural resources, development of or reference to existing historic contexts, an archaeological sensitivity assessment or archaeological predictive model, and a listing of any Federally-recognized Native Hawaiian organizations associated with the installation.
- A plan for the actual field inventory and evaluation of cultural resources that is prioritized according to the inventory evaluation requirements associated with

specific installation compliance requirements, such as the NHPA Section 106 undertakings that could affect cultural resources.

- Internal procedures for consultation, survey, inventory, evaluation, treatment, recording, monitoring, emergency, inadvertent discovery, reporting, etc. tailored to the particular conditions and specific requirements at the installation. Interface requirements between the cultural resources management program and other program areas should be identified.
- Provisions for the curation of collections and records that are associated with the NHPA undertakings, and procedures to reduce materials permanently curated by the installation.
- Provisions to limit the availability of cultural resources locational information to protect resources from damage.
- Conduct an economic analysis and alternative use analysis on historic properties that are being considered for demolition and replacement.
- Procedures to ensure that Native Hawaiians organizations (NHOs) are provided access to sacred sites and are consulted when future access may be restricted or when adverse effects to the physical integrity of the sacred site may occur.
- Development of standard treatment measures for cultural resources.

2.4.2.1 Standard Operating Procedures

SOPs provide the steps necessary to mitigate impacts to cultural resources and historic properties. Each SOP is paired with the pertinent regulations that the facility must follow to maintain regulatory compliance. The SOPs address specific situations that are triggered by specific events, and they identify personnel, or categories of personnel, who implement the protocols for each event. Most of the SOPs included in the ICRMP relate to the repair, maintenance, and preservation of historic buildings. The SOPs within the ICRMP address specific problems likely to occur at the majority of the facilities covered in the ICRMP and will be refined over time as the document is updated. Each SOP provides steps for implementation and notification requirements. SOPs included within the ICRMP are listed below:

- 1. Facilities maintenance and repair
- 2. Facilities restoration and renovation
- 3. Environmental remediation programs
- 4. Land transfers, acquisitions, and disposals
- 5. Inadvertent discovery of cultural materials
- 6. Human remains and associated burial items
- 7. Soldier awareness training
- 8. Mission training
- 9. Emergency and disaster situations

2.4.2.2 Five-Year Management Plans

Management plans for cultural resource investigations at HIARNG facilities consist of goals designed for implementation within the first period covered by the ICRMP (2008 to 2012). The following table shows the goals by facility and by staff for the first period outlined within the ICRMP.

BY FACILITY	GOALS FOR 2008-2012
Ft. Ruger	Garner grants to repair and maintain Battery Harlow. Complete the Mitigation Plan in FY08 for the Abandonment of Ft. Ruger in FY10.
Kalaeloa, Pu'unene MCRC	Assess Cold War resources and prepare a PA for Kalaeloa. Design mitigation plan for destruction of pads and WWII remnants at Pu'unene.
KMR, Kalaeloa	Complete inventory surveys and design protection measures and educational initiatives for archaeological sites.
KMR, Kalaeloa, Ft. Ruger Historic District, Kea'au Armory	Define site boundaries of archaeological sites, and map using GIS; complete archaeological inventory level surveys of

Table 2.1 Goals for the First Five Year Period

	facilities not surveyed or only partially surveyed. Kea'au Armory to be completed in
KMR, Kaunakakai Armory	Prepare plan for restoration of cannon at KMR. Prepare protective enclosure for display of the cannon IAW the MOA.
KMR, Waiawa Utes, Ft. Ruger Historic District, Kalaeloa, Pu'unene MCRC, Kaunakakai Armory	Complete functional evaluations for features and historic buildings to determine NRHP eligibility, beginning with KMR and Waiawa UTES in FY08, and Ft. Ruger and Kalaeloa in FY09.
BY STAFF/MISC	GOALS FOR 2008-2012
All staff, trainers, guardsmen	Educate HIARNG and user groups of the cultural resources present at facilities and LTAs to mitigate any impacts during training and other activities. Provide on-going training in historic preservation and archaeological resource protection to HIARNG personnel in the form of cards, posters, and through EQCC meetings. Produce field cards for use by commanders and Guardsmen to identify sensitive cultural resources in the field.
EQCC, FMO Staff, All FECs	Fully disseminate the ICRMP to each facility. This includes briefing all staff and commanders; review SOPs with each facility.
NGB	Distribute copies of all past and future cultural resources reports to NGB.
Real Property, FMO	Work with the Real Property Officer to determine lease and landholding agreements such that EAs can be completed and RODs prepared for training.

2.4.3 Partners and Coordination

Because of its dual state-federal status, the HIARNG will continue coordinating with various federal and state agencies in implementing the ICRMP. The expertise of researchers, land managers, and stakeholders is essential in ensuring a comprehensive and well-planned execution of cultural resource stewardship. Cooperation also extends to private non-profit organizations, especially in order to facilitate public outreach efforts. At a minimum, informal partnerships extend to the following:

- Hawai'i Department of Land and Natural Resources, State Historic Preservation
 Division
- National Park Service
- U.S. Fish and Wildlife Service
- U.S. Geological Survey
- University of Hawai'i, Department of Anthropology and Pacific Cooperative Studies
 Unit
- Historic Hawai'i Foundation
- Bernice Pauahi Bishop Museum
- Na Ala Hele National Trails Initiative

- Coastal Defense Study Group
- Diamond Head State Monument, State Parks Division
- Office of Hawaiian Affairs
- Hui Malama I NA Kupuna 'O Hawai'i Nei
- Department of Hawaiian Homelands
- Neighborhood Boards
- Island Burial Councils

Chapter 3. Alternatives Considered

3.1 Alternatives Considered

The proposed action, which is the implementation of an ICRMP, is the preferred alternative. Preparation and full implementation of the ICRMP is an Army regulatory requirement (AR 200-1). Other alternatives, including partial implementation of the ICRMP, were dismissed as being infeasible in light of the Army regulations and the goal of providing consistent standards for the management of resources under the HIARNG's stewardship.

3.1.1 No-Action Alternative

The "No Action Alternative" is the only alternative to the proposed action considered in this EA. Inclusion of the no action alternative is prescribed by the President's Council on Environmental Quality (CEQ) regulations (40 CFR 1502.14). The no action alternative reflects the status quo and serves as a benchmark against which Federal actions can be evaluated. For this analysis, the status quo involves the management of cultural resources at HIARNG facilities under existing procedures. The existing procedures do not clearly delineate the internal process whereby cultural resource management concerns and requirements will be integrated into the day-to-day operation of HIARNG facilities. Due to a lack of specific guidance and standard operating procedures, cultural resources are often managed using an ad hoc approach. Also, HIARNG cultural resource management or recently issued Federal regulations, Executive Orders, and Presidential Memoranda concerning the management of cultural resources and interaction with NHOs and Native American groups.

3.1.2 ICRMP Implementation

The HIARNG does not have an ICRMP as required by AR 200-1. Existence of such a plan would provide a standardized procedure. It would evolve from year to year. Thus, an ICRMP would account for HIARNG's needs while maintaining currency with evolving federal and state laws, regulation, and policies.

Chapter 4. Affected Environment and Environmental Consequences

4.1 Resource Areas Considered But Not Analyzed

Resource areas that are generally considered in environmental analyses, but not assessed in detail for this proposed action, are listed below along with the rationale for their dismissal from further analysis:

- Geology, Geography, and Climate These are discussed in Section 4.4 as part of the Affected Environment, because they are important to understanding the context of Hawaiian history and culture. However the scale of activities proposed in the ICRMP cannot reasonably be expected to impact these large-scale resource areas.
- Floodplains Executive Order 11988 Floodplain Management restricts federal agencies from constructing in floodplains. No construction or other modification of a floodplain area is proposed in either alternative.
- Prime Farmland The Farmland Protection Policy Act (1981) protects prime or unique farmlands from unnecessary and irreversible conversion to non-agricultural uses. HIARNG facilities at Pu'unene and Ukumehame contain prime farmlands, but no activities are planned that would develop or otherwise alter these lands.
- Coastal Zone Management The primary focus of the Coastal Zone Management Act of 1972, as amended through P.L. 104-150, The Coastal Zone Protection Act of 1996, is to effectively manage so as to preserve, protect, develop, restore, or enhance the resources of the nation's coastal zones. There are no activities planned in the proposed action that would impact any coastal resources. Should circumstances arise that would require such activities, the appropriate state and local agencies will be consulted.
- Wild and Scenic Rivers A wild and scenic river, defined as a free-flowing river or segment of a river that has exceptional scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, can be designated by act of Congress (P.L. 90-542) or by the Secretary of the Interior at the request of a governor as part of the National Wild and Scenic Rivers system. There are no designated Wild and Scenic Rivers in Hawai'i.
- Aesthetic and Visual Resources No activities that would be affected by the implementation or non-implementation of the ICRMP would have any impact on the current visual quality of the HIARNG installation.
- Infrastructure Infrastructure consists of the physical systems and structures that allow a population to live and function in a defined area. These systems include drinking water, electricity, waste disposal, communication, and transportation. The management of cultural resources as proposed would not place additional demands upon or change existing infrastructure.
- Economy Potential impacts of Cultural Resource management on the local economy would be limited to tourism activities. However access to the general public of most cultural resources under HIARNG management is restricted due to the nature of the agency mission.

4.2 Mission, Location and Land Use

As mentioned previously, the HIARNG has dual state and federal missions to provide ready forces in support of national military strategies and civil authorities. In support of these objectives, HIARNG administers 16 sites statewide via Gubernatorial Executive Order or through lease agreements from other state and federal agencies and private parties.

The HIARNG conducts its activities within the 1293 acre multi-site composite installation, as well as at active Army installations and ranges throughout the Hawaiian Islands (see Table 1.1). Two major sites comprise important headquarters for the HIARNG. The 509-acre Keaukaha Military Reservation outside of Hilo is the Guard's largest combined headquarters/training site. In addition to being the Big Island headquarters for the HIARNG, the reservation contains firing ranges, historic buildings, Native Hawaiian prehistoric and historic archaeological sites, support facilities, and offices. Fort Ruger on O'ahu dually serves as the Joint State Headquarters for the Adjutant General and provides operational support to the largest unit of the Guard, the 29th Infantry Brigade (Separate). Additional facilities located throughout the state include:

- Twelve Armories, located on all main islands, providing local National Guard headquarters for small military units and recruiters throughout the state.
- Five Organizational Maintenance Shops (OMSs), Motor Pools and Vehicle Storage Buildings providing vehicle maintenance.
- Two Combined Support Maintenance Shops (CSMSs) providing electrical, automotive and limited depot support.
- Two Army Aviation Support Facilities (AASFs) offering air crew aviation training and aircraft maintenance service and supply storage.
- A Unit Training Equipment Site (UTES), located at Waiawa, Oahu, providing ground equipment support.
- A Regional Training Institute (RTI) which consists of a 48-acre headquarters providing training for various Army soldiers from the Pacific region.

Table 4.1 summarizes data on the various facilities within HIARNG's installation.

The Guard does not own outright the land under the facilities described above. The State of Hawai'i owns 97% of the total area used by HIARNG, while other branches of the military or private land-owners own the remainder. The HIARNG is generally permitted access to state leased-lands for training exercises on a revocable permit basis. The HIARNG's ICRMP only addresses those properties which are on lands under HIARNG control, either through a permit (through a Federal agency) for conducting HIARNG activities on Federal lands, or through an Executive Order (through the State of Hawai'i) for conducting HIARNG activities on State lands. The HIARNG also has exclusive access, under State Executive Orders, to other areas such as Keaukaha Military Reservation (KMR) and Ukumehame Firing Range (UFR). The ICRMP focuses on six priority sites controlled by HIARNG (Table 4.1, noted in bold), some of which are eligible for federal funding and are known to contain important resources in need of preservation.

Table 4.1. Tenure status of HIARNG facilities.

FR- firing range, HQ- headquarters, LTA- land training area, S- support facility.

	Facility	Facility Type*	Property Control	Size (acres)		
Haw	Hawai'i (516 total acres)					
1.	Keaukaha Military Reservation (includes Hilo Armory, CSMS #2, AASF #2, SMF, and MVSB)	HQ	HIARNG/State	509		
2.	Kea'au (Ola'a) Armory	S	HIARNG/State	3		
3.	Kealakekua Armory	S	HIARNG/State	4		
Мац	Maui (71 total acres)					
4.	OMS #3 (Paukukalo)	S	HIARNG/State	2		
5.	Pu'unene (Maui Consolidated Facility)	LTA	HIARNG/State	30		
6.	Ukumehame Firing Range	LTA-FR	HIARNG/State	39		
Mol	oka'i (3 total acres)					
7.	Kaunakakai Armory	S	HIARNG/State	3		
O'al	O'ahu (626 total acres)					
8.	Bellows Regional Training Institute	S	HIARNG/Federal	48		
9.	Ft. Ruger and Diamond Head Crater (includes Joint State Headquarters, Batteries Harlow, Berkhimer, & 407, CSMS #1, USPFO,	HQ	HIARNG/State	337		
10.	WAAF (includes Wheeler Armory, AASF #1 and Bldg.'s 829 & 832)	S	HIARNG/Federal	31		
11.	Wahiawa Armory (including OMS #2)	S	HIARNG/Fed & State	41		
12.	Waiawa Gulch (includes Armory, UTES, RTS-M and MVSB)	S	HIARNG/Fed & State	22		
13.	Kalaeloa	S	HIARNG/Federal	147		
Kaua'i (76 total acres)						
14.	Hanapepe Armory and OMS #5	S	HIARNG/State	5		
15.	Kapa'a Armory and MVSB	S	HIARNG/State	3		
16.	Kekaha Firing Range	FR	HIARNG/State	68		

4.2.1 Proposed Action

Implementation of the ICRMP would have a minor, indirect, and long-term positive impact on mission and land use by the HIARNG during the planning period. By identifying and protecting cultural resources and by educating users, damage that can lead to violations and interrupt training will be avoided, and will allow military units to concentrate on training. This goal is already coordinated with the trainers and planners of HIARNG, and is heavily integrated into the overall mission to sustain the environment and subsequent training opportunities.

4.2.2 No-Action Alternative

Under the no-action alternative, mission and land use by HIARNG could be impacted during the FY08 through FY12 planning period if the ICRMP were not implemented. Violations of resource protection regulations and inadvertent damage to these resources because of lack of inventory and awareness could interrupt the mission. This could result in minor to significant long-term indirect impacts on troop readiness. The acquisition of necessary funds for implementing cultural resources programs that prevent training-related impacts to the cultural environment and for filling needed staff positions are needed, and these areas may be affected if the ICRMP is not implemented.

4.3 Air Quality

The air in Hawai'i is relatively clean and low in pollutants. Hawai'i complies with the standards of the Clean Air Act of 1970, as well as the National Ambient Air Quality Standards for carbon monoxide, nitrogen dioxide, sulfur dioxide, ozone, particulate matter, and lead. Hawai'i is, therefore, an "in attainment" state. The lack of sizeable heavy industry and nearly constant trade winds are instrumental in maintaining clean air. With the exception of sulfate volcanic emissions ("vog") impacting residents of the island of Hawai'i, air pollution rarely reaches levels associated with the haze of major mainland cities.

HIARNG facilities and ranges do not contribute significant air pollution discharges, as the installation lacks any heavy industry, processing, or production that would result in emissions. Consequently, we expect that ambient air quality in and around HIARNG buildings and ranges is the same as that found statewide.

4.3.1 Proposed Action

The implementation of the ICRMP statewide would have no impact on the regional and statewide air quality. Possible construction activities, such as fence building or excavation, may lead to dust emissions. However, this exposure would be short-term and extremely small-scale, and would not contribute to air quality problems within the region or the state. Cultural resource staff can manage any short-term fugitive dust with standard control measures, such as watering or covering exposed surfaces, but it would be more to provide comfort and safety to workers than out of a need to mitigate regional air quality concerns.

4.3.2 No-Action Alternative

Under the no-action alternative, air quality would remain at its present condition.

4.4 Noise

The Operational Noise Management Program is the framework for the control of noise produced by Army activities since noise has been determined, as recorded in the Noise Control Act of 1972, to "present danger to the health and welfare of this Nation's population" (PL 92-574 1972). The primary strategy for noise management is the Operational Noise Management Plan (ONMP). The US Army Center for Health Promotion and Preventative Medicine (USACHPPM) prepares ONMPs for each state, which analyze noise generated from military activities that has the potential to create an environment that is incompatible with noise-sensitive land uses or that could generate complaints. The primary analytical tool of the ONMP is the Installation Compatible Use Zone (ICUZ), which overlays potential decibel level contours, weighted by the number of events and their duration, to local population structure. USACHPPM completed the HIARNG Operational Noise Management Plan in July 2005. ICUZ studies indicate that reported noise contours of facilities and ranges do not exceed local ordnances, state, and federal standards. The primary source of noise from HIARNG facilities and ranges is from small arms weapon qualifications (explosion noise), helicopter training, and vehicular traffic.

4.4.1 Proposed Action

Impacts on the noise environment caused by cultural resource activities would be limited to construction noise associated with renovation of buildings. This would be an infrequent event, and construction activities do not generate significant noise levels more than a few hundred feet from the source. The only renovation currently proposed in this ICRMP is at Battery Harlow, which is more than 1000 feet from any residential area. If noise levels are noticeable, this would be a minor, direct, short-term, adverse impact.

4.4.2 No-Action Alternative

Cultural resource management projects would not be implemented under the no-action alternative, and as a result noise would remain unchanged.

4.5 Geography, Soils and Climate

The following components, **4.4.1** Geology and Geography and **4.4.3** Climate, are described here because they are relevant to the cultural resources of Hawai'i. However, the implementation of the ICRMP cannot reasonably be expected to have an impact on these resources, so they will not be evaluated with respect to the Environmental Consequences of this proposed action.

4.5.1 Geology and Geography

The Hawaiian Islands formed over many millennia when volcanic eruptions from a single "hot spot" produced a series of islands. This process produces massive shield volcanoes exhibiting relatively gentle slopes formed from solidified basalt lava flows. Subsequently, clusters of smaller, more explosive late-stage volcanoes, such as Diamond Head on Oahu, built cinder cones comprising Southeastern Oahu in relatively shorter periods (Macdonald et al, 1983). As the underlying tectonic plate moves to the northwest, these formations are carried off the hot spot and volcanism ceases. Over millennia, wind and rain have slowly eroded the islands. Thus the Big Island at the southeastern end of the chain possesses active volcanoes that continue to increase its size while Kauai, dormant for millions years, is highly weathered. A series of pinnacles, atolls, and seamounts stretch 3800 miles from the central and north Pacific to the Aleutian Islands, forecasting the ultimate fate of today's

extant islands (Clague, 1998). Due to its geologic history, the archipelago exhibits an impressive range in elevation: from sea level to the 4,180 m summit of Mauna Kea on the Big Island.

The isolation of the islands is a major determinant of the human culture and ecology. Plants and animals brought by the Polynesian settlers are important to the local culture, but have had varying effects on the ecosystem. Endemic species which evolved in isolation often do not have defenses against new competitors, predators and herbivores. This situation has been compounded with the coming of European explorers and immigrants, who not only brought additional invasive plants and animals, but diseases against which the native Hawaiians had no immunities and which greatly decreased the native population.

4.5.2 Soils

Basaltic lavas weather to form two main soil types which together comprise almost 40 percent of soils in the State: Histosoils, or organic soils forming on forested lava lands, and Inceptisols, or thin, mantles of volcanic ash (Uehara, 1983). Other miscellaneous land types consist of rough mountainous land, coral outcrops, beaches, and fill-land. All together, 11 of the 12 soil orders have been reported in the Hawaiian Islands (Gavenda et al, 1998).

Soils develop under a wide range of environmental conditions, resulting in a complex distribution. A variety of factors (human/mechanical disturbance, high wind speeds, soil composition) make some of these sites prone to erosion, which compromises water quality, vegetation re-establishment, military training opportunities, and may lead to exposure and damage to buried artifacts.

4.5.2.1 Proposed Action

Certain cultural resources management activities, such as shovel testing, can cause minor disturbance to soils. When carried out properly these activities should have negligible erosional effects and proper restoration of the site will render the soil impacts short-term. No excavations are currently planned.

4.5.2.2 No-Action Alternative

Cultural resource management projects would not be implemented under the no-action alternative, and as a result soil resources would remain unchanged.

4.5.3 Climate

In comparison to continental areas, the Hawaiian climate is very constant, with mean monthly temperatures varying by only 9° F throughout the year (Giambelluca and Schroeder, 1998). Thus the islands experience only two recognizable seasons: a warmer period during the summer months (May through September), and a cooler, rainy season in the winter and spring (October through April).

The majority of HIARNG ranges or facilities are lowland areas, located between sea level and 600 m elevation. Climate regimes at HIARNG's sites vary depending on whether the area is a lowland, leeward coastal site, or a windward, forested area. In the wet forest areas of Kauai and Maui, estimated annual rainfall is 40-50 inches while arid and windswept leeward sites, such as Ukumehame, Diamond Head, and Kekaha, receive 20-30 inches of rain annually (USFWS Rare & Endangered Species Surveys HIARNG Lands, 1997 - 1999). These drier sites often depend on low-pressure Kona (leeward) storms for rain. The 1998 -1999 El Niño phenomenon brought prolonged drought to these areas. Moist, warm climates and salt air (along with aggressive alien termites) often contribute to the rapid deterioration of artifacts and buildings, and can make maintaining older structures a challenge.

4.6 Biological Resources

4.6.1 Biological Diversity

The Hawaiian Islands lie on the outskirts of the tropics in the central Pacific, at roughly 21° N latitude. Because of the archipelago's isolation (4,000 km of ocean separates it from the nearest continent), Hawai'i is one of the most distinctive high island archipelagic eco-regions on earth. This isolation restricted the number of plant and animal immigrants. Successful immigrants found a diversity of habitats and microclimates in which to flourish, without competition from large land mammals, disease, and predators. As a result, researchers estimate that through adaptive radiation the original 275 immigrant plant species gave rise to roughly 1,000 species of native flowering plants, 90% of which are endemic or unique to the Hawaiian Islands (Lamoureux, 1998). Likewise, the 113 species of native birds are thought to have evolved from as few as 20 original immigrants (Conant, 1998). This process of speciation makes the Hawaiian Islands a showcase of biological evolution. Since the ranges of endemic species are restricted, often to only a part of one island, habitat loss and invasion by alien (non-native) species has also caused many Hawaiian species to become endangered or extinct. Many of these native plant and bird species, as well as those introduced by Polynesian settlers, are important to the native Hawaiian culture.

4.6.1.1 Proposed Action

ICRMP projects designed to protect cultural resources will have minor, extremely localized impacts on maintaining the unique biodiversity that exists in these islands. Ground disturbance has the potential to introduce alien plant species to a site. Precautions such as cleaning clothing, footwear, and tools can minimize this risk. To the degree that restoration efforts reintroduce native plant species, this would have a minor and localized positive impact on biological diversity, which can be rendered long-term with proper maintenance.

4.6.1.2 No-Action Alternative

Under the no-action alternative, ICRMP projects that protect cultural resources would not be implemented. As a result, threats to cultural sites and their related biodiversity would remain, and cumulative, irreversible damage to cultural sites and native ecosystems would be likely to continue into the future.

4.6.2 Native Ecosystems

Although over a third of HIARNG lands support some form of native communities, more than half of this land is over-run with non-native species that are landscaped or cultivated. In addition to alien dominated forests and scrubland, this includes small areas currently in cultivation, abandoned sugar cane fields, and improved areas such as urban facilities or landscaped properties.

HIARNG's undeveloped lands include a wide variety of dry leeward and wet windward ecosystems, from coastal sites (sea level to 250 m elevation) to upland gulches (between 300 and 600 m elevation). Generally, ecosystems found on Guard lands fall into two broad categories: 1) low-lying, dry leeward ecosystems; and 2) windward wet or mesic forests.

Although most sites are greatly altered, some support valuable biological resources. These include the following: wetlands, watersheds, and tributaries; rare native dryland forests and native coastal mesic forests; coastal strand dunes; underground cave ecosystems; and endangered water birds and associated riparian sedges, arthropods, and fish. The seasonal wetlands of Ukumehame Firing Range and Diamond Head Crater at Fort Ruger provide biologically important habitat for plants as well as endangered water birds, and as such are unusual features of predominantly dry, leeward coasts.

4.6.2.1. Proposed Action

Management of weeds that are overgrowing cultural sites and may be damaging them would likely be a part of the restoration process. Replacing them with native plant species would help restore native ecosystems on a very small scale, so there may be a minor beneficial impact, rendered long-term with proper maintenance.

4.6.2.2 No-Action Alternative

ICRMP projects to restore cultural sites and enhance resiliency to weed invasion would not take place. Under the no-action alternative, the current conditions and threats to native ecosystems would remain and likely worsen in the long-term.

4.6.3 Vegetation

Although most HIARNG land is covered with non-native and/or degraded habitat, native plant communities flourish in some areas. Gagne and Cuddihy (1999) identified five community types that can be applied to HIARNG lands:

Coastal Dry Communities. Ukumehame Firing Range, Kekaha Firing Range and Diamond Head Crater at Fort Ruger all contain coastal dry communities, consisting of mixed herblands, grasslands, and shrublands. These areas are most extensive on leeward sides of the islands, and are characterized by prolonged drought conditions from May to September. Annual winter rains averaging less than 47 inches (120 cm) are the only source of fresh water, although certain plants such as kiawe (*Prosopis pallida*) are able to utilize brackish groundwater. The vegetation in these communities is salt-tolerant and varies according to substrate, which ranges from sand dunes to rocky basalt. HIARNG lands support a native coastal dune community containing the succulent herb *Nama sandwicensis* at Kekaha firing range on Kauai. As with most lowland areas in Hawai'i, human development has displaced this once wide-spread community.

Coastal Wet Communities. Native wetlands, shrublands and rain forests that once occurred along coastlines, have been likewise displaced by human influence and non-native species. Wet sedgelands and shrublands are the most widespread example of this community type, which itself is considered rare. The 50-acre remnant coastal 'ohi'a/lama (*Meterosideros/Diospyros*) dominated forest at Keaukaha Military Reservation in Hilo is a rare representative of coastal wet forests that once inhabited low lying areas prior to Polynesian arrival, and now have been largely extirpated throughout the islands.

Lowland Dry Shrublands and Forests. Six HIARNG sites are in lowland dry coastal areas, a mixed community generally distinguished as either native or native/alien codominant. These areas generally occur on flat rocky areas or recent lava flows, and have very shallow soil substrates composed of silty loams to stony clay soils. Climate is distinctly seasonal, with hot, dry summers and rainfall of less than 40 inches (100 cm) annually. Dryland areas on HIARNG lands are comprised of fragmented native communities surrounded by non-native grasses and annuals. In the few areas where native species dominate, common native constituents include shrubs such as 'a'ali'i (*Dodonaea viscosa*), 'akia (*Wikstroemia monticola*), 'ilima (*Sida fallax*) and 'uhaloa (*Waltheria indica*), intermixed with wiliwili (*Erythrina sanwicensis*). Alien species commonly found in these dry areas include koa haole (*Leucaena leucoephila*), kiawe, beardgrass (*Andropogon virginicus*) and natal redtop (*Rhynchelytrum repens*). Native dry forests and shrublands throughout the Hawaiian Islands have been greatly reduced by agricultural development, fire, grazing by livestock, and weed invasion.

Lowland Mesic Forests. These communities are found on all main islands between 30-1600 m elevations and contain a diverse range of vegetation. As many as seven distinct, native mesic forest community types have been described, containing everything from small shrubs to 20 meter-tall trees. Very few of these areas, however, are found on HIARNG lands. Over half of all Guard lands support mostly former agriculture lands as well as lowland mesic forests dominated by dense stands of alien species such as Christmas berry *(Schinus terebinthifolius),* common guava *(Psidium guajava),* Java plum *(Syzygium cumini),* and silk oak *(Grevillea robusta).*

Lowland Wet Forests. These forests are generally found on all of the main Hawaiian Islands between 100-1,200 m elevation. Rainfall and substrates vary markedly within seven recognized sub-communities. Generally, native constituents of lowland forests include the canopy species of 'ohia lehua and koa. Common understory species include 'olapa *(Cheirodendron* spp.), uluhe *(Dicranopteris linearis),* and species of *Myrsine, Hedyotis* and *Psychotria.* Wet forest areas on HIARNG lands are largely dominated by common guava, Java plum, and mountain apple *(Syzygium malaccense).*

Aggressive alien vegetation common to most HIARNG facilities can overrun structures and other cultural sites, and cause damage and premature deterioration.

4.6.3.1 Proposed Action

Implementation of the ICRMP would have minor, yet overall positive effects on vegetation communities. Most HIARNG lands are dominated by alien species that displace native species and form monotypic stands. HIARNG efforts are small scale and targeted to extremely localized regions where effort and benefit can be controlled. Controlling or eradicating alien species from Native Hawaiian cultural sites will require specific chemicals for each of the target species. HIARNG would take special precautions to avoid chemical damage to non-target plants, such as shielding them, spraying in low wind conditions, or manually removing pest plants. The overall use of herbicides should decrease over time as pest populations decrease. The outplanting of native species related to activities at the cultural site would increase plant diversity while displacing alien species on the site, and will create a positive long-term benefit.

4.6.3.2 No-Action Alternative

Under the no-action alternative, ICRMP measures that remove alien species and restore native communities at Native Hawaiian cultural sites would not be implemented. Consequently, ecosystems would remain in their current condition and likely worsen, invaded by non-native species, and sites would continue to be inundated by alien species.

4.6.4 Endangered Species

The impact of human settlement, particularly in the past 150 years, has brought about swift changes to Hawaiian ecosystems. Over thousands of years, flora and fauna that migrated to the Islands evolved in complete isolation and lost their natural defenses and competitive strategies against pests and predators. As a result, urbanization, development, and the introduction of non-native plants and animals have completely displaced or altered native

ecosystems, so that much of what remains today is rare or critically endangered. For example, the native lowland dry forest, considered the most species rich ecosystem in the Hawaiian Islands, has suffered almost the complete loss of native plant species (Cuddihy and Stone, 1990). While the total land mass of the Hawaiian Islands represents less than one percent of the United States, it has over one-third of the federally listed endangered species.

The Endangered Species Act (ESA) (16 USC 1536) requires federal agencies that fund, authorize, or implement actions to avoid jeopardizing the continued existence of federally listed threatened or endangered species, or destroying or adversely affecting their critical habitat. Federal agencies must evaluate the effects of their actions through a set of defined procedures, which can include preparation of a Biological Assessment and formal consultation with the U.S. Fish and Wildlife Service (USFWS).

USFWS surveyed HIARNG facilities for rare, threatened, and endangered species from 1996 to 1999. Ten federally listed endangered species—three plants, one insect, five birds, and one mammal—occur or have been reported on HIARNG lands. In most locations the endangered birds and the hoary bat are transient or migratory, visiting HIARNG lands occasionally. These species forage for food on HIARNG and adjacent lands. Endangered birds and the hoary bat may also intermittently roost or nest on training lands during specific times of year, before moving to other suitable areas. As a result, HIARNG areas may be important to these species as part of a larger home range. In contrast, dry forest areas remain extremely rare throughout the state, and even tiny remnant communities are important habitat for endangered plants on HIARNG lands.

An initial draft of this EA was reviewed by USFWS, and USFWS concurred via a telephone conversation, and follow-up email with the following effects determination:

4.6.4.1 Proposed Action

Activities proposed in the ICRMP would involve restoration of buildings, and very minor localized ground disturbances. This would not be expected to have any effect on endangered species, unless a plant population happened to be located at a survey location. GIS documentation and ground surveys can identify these, and appropriate action to avoid effects on the plants can be taken.

4.6.4.2 No-Action Alternative

Under the no-action alternative, no change in current status of endangered species would occur.

4.7 Water Resources

4.7.1 Streams and Wetlands

Streams, wetlands, and watersheds provide important habitats for a variety of organisms. At the same time, their human use value has resulted in loss or degradation. Thus streams and wetlands have been greatly altered throughout the state, both purposely (via agriculture, development, and re-channelization) and inadvertently (via pollution and run-off). It is estimated that at least 366 perennial streams have been identified in the Hawaiian Islands, of which 75% have been significantly degraded (Hawai'i Cooperative Park Studies Unit, 1990). Today, stringent state and federal regulations, like the Clean Water Act and the

Endangered Species Act, protect these water bodies as habitat for unique native aquatic fauna and endangered water birds, and as a resource in their own right.

Several HIARNG facilities contain streams or wetlands. Perennial streams exist at Bellows Air Force Station (O'ahu). In addition, seasonal wetlands in coastal areas form on HIARNG lands during heavy winter rains. These intermittent wetlands can be found at Kekaha Firing Range, Kauai, Diamond Head Crater on Oahu, and Ukumehame Firing Range, Maui. The small wetlands (1 and 7 acres respectively) at the latter two facilities are especially significant because they provide habitat for several endangered plant and bird species.

4.7.1 Proposed Action

No ground disturbing activities are planned near wetlands or streams, so no effects would be expected. Routine precautions while using herbicides near water sources would protect from inadvertent contamination of water bodies.

4.7.2 No-Action Alternative

Under the no-action alternative, conditions would remain in their current condition.

4.8 Cultural Resources

All HIARNG facilities contain cultural resources or historic sites identified by reconnaissance and inventory surveys. The ICRMP provides detailed management strategies, protocols, and SOP's for management of these resources statewide, and for resources that have not yet been identified. The majority of cultural resources on HIARNG lands are historic buildings related to federal ownership by the Navy, Army, and Air Force during WWI and II. These include temporary wooden buildings, batteries, tunnels, trails, wooden warehouses, hangars (both WWII and Cold War at Kalaeloa), Quonset huts, airplane revetments, a cemetery, and infrastructure such as airstrips, roads, walls, and magazines.

Under Section 106 of the National Historic Preservation Act, the HIARNG is responsible for identifying, evaluating, and taking into account the effects of all undertakings on historic properties in association with the procedures set forth in 36 CFR 800. The State Historic Preservation Division (SHPD) is a significant participant in the Section 106 compliance process, as they provide comments on efforts to identify, evaluate, and treat any effects on historic properties. Initial drafts of the ICRMP and EA were sent in December 2005 to SHPD; as of January 2008, no response has been received despite several follow-up inquiries.

4.8.1 Native Hawaiian Prehistoric and Historic Sites

Three facilities contain Native Hawaiian prehistoric and Hawaiian historic sites (KMR, Bellows RTI, and Kalaeloa). The Puna Trail, a prehistoric Native Hawaiian foot trail which encircles the island of Hawai'i, traverses the KMR facility. Bellows RTI on the island of O'ahu contains a deeply buried prehistoric Native Hawaiian deposit, believed to be associated with agricultural activity dating back to early in the first century. Two sinkholes have been discovered at Kalaeloa and need to be inventory-level surveyed. These sinkholes may contain the fossilized remains of extinct or endangered native bird species that once lived on the arid plains of O'ahu.

4.8.2 Consultation with Native Hawaiian Organizations and Native Hawaiians

In 1994 and 2000, President Clinton signed two Executive Orders (EO's). EO 13007 "Indian Sacred Sites" and EO 13175 "Consultation and Coordination with Indian Tribal Governments" requires that Federal land managers take into consideration the preservation of and access to sacred sites located on their lands. EO 13175 requires that Federal land managers establish "government to government" relationships with federally recognized tribes and tribal governments when developing policy or performing actions that substantially effect tribes. The EO requires the development of consultation process to ensure meaningful and timely input by tribal officials. These EO's support the revised Section 106 of the NHPA as amended in 1999 for extensive consultation with tribes regarding cultural resources issues. Under AR 200-1 Section 3-3 (C) (4) (b) requires the installation commander to consult with any Federally recognized Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to a property being considered in the Section 106 process, and this consultation must be on a government to government basis. Installation commanders must initiate the consultation.

On 21 October 1998, the DoD promulgated its annotated American Indian and Alaska Native Policy, which emphasizes the importance of respecting and consulting with tribal governments on a government-to-government basis. The policy requires an assessment, through consultation, of the effect of proposed DoD actions that may have the potential to significantly affect protected Native American tribal resources, Native American tribal rights, and Native American lands before decisions are made by the services. While Native Hawaiians are not a federally recognized government, HIARNG complies with the spirit of the policy by consulting with a number of Native Hawaiian groups that may be impacted by its actions. Likewise, consultation is not required under AIRFA, the American Indian Religious Freedom Act. However, in complying with the spirit of AIRFA, the meaning and intent can be met by consulting with the appropriate Native Hawaiian organization or group to identify the traditional cultural and religious practices for which access is required. A site may be a "sacred site" as defined under EO 13007 without being considered a Traditional Cultural Place (TCP).

4.8.3 Historic Structures

The remaining facilities, with the exception of four, have historic structures, or structures which are expected to become 50 years old over the five-year span of the ICRMP. These structures will be subject to significance assessment in accordance with the NHPA criteria for listing on the National Register as they age. Within these parameters, HABS/HAER (Historic American Buildings Survey/Historic American Engineering Record) evaluation will be required for many and replacement construction cannot take place without prior consultation under Section 106 of the NHPA.

4.8.4 Proposed Action

The inventories, assessments, and SOP's proposed in the ICRMP have the following objectives:

- Maintaining the viability of archaeological and historic resources while ensuring the sustainability of the military training mission
- Maintaining, protecting, and improving cultural integrity
- Protecting cultural resources from damage or degradation
- Identifying and restoring degraded historic and archaeological resources

Construction activities would be monitored according to pre-approved monitoring plans, MOAs, or MOUs. Consultations with Native Hawaiian groups and individuals, the SHPD, and other concerned citizens will deliver protocols in the monitoring plan for the inadvertent discovery of archaeological or human remains, protection of sites in the work area, and protocols for investigation of sites in the form of testing or data recovery, if required. Interpretive plans would convey information about the history of Hawai'i to the public. For these reasons, the ICRMP would have a direct, long-term, positive impact on the cultural resources of Hawai'i.

4.8.5 No-Action Alternative

Under the no-action alternative, ICRMP actions would not take place. Non-implementation of the ICRMP could have a long-term adverse impact on cultural sites and historic buildings, as there could be a higher incidence of non-compliance with AR 200-1, Section 106 of the NHPA, and with EOs 13007 and 13175. Lack of documentation and awareness of cultural resources would likely result in inadvertent damage to these resources.

4.9 Socio-economics

4.9.1 Population Demographics

Hawai'i's population surpasses all other states in ethnic and national diversity, with no single race comprising a majority of the populous. Hawai'i's major ethnic groups include: Asian of various nationalities (41.6%), Caucasians (24.3%), Native Hawaiians (9.4%), mixed ethnic background, including some part Native Hawaiians (21.4%) (US Census Bureau website). Hawai'i's population grew by 103,008 from 1990 to 2000 from 1,118,529 to 1,211,537 and up from 622,000 at statehood in 1959, with the majority residing on the island of Oahu (Schmitt, 1998).

4.9.1.1 Proposed Action

While implementation of the ICRMP would have no effect on population demographics, preservation and interpretation of cultural resources could have a minor beneficial effect on the knowledge and cultural identity of the numerous ethnic groups in Hawai'i.

4.9.1.2 No Action Alternative

Not implementing the ICRMP would have no effect on the current state of knowledge about the cultural heritage of ethnic group populations in Hawai'i.

4.9.2 **Protection of Children**

On April 21, 1997, President Clinton issued Executive Order (EO) 13045, "Protection of Children from Environmental Health Risks and Safety Risks," which recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health and safety risks. This EO requires federal agencies, to the extent permitted by law and mission, to identify and assess such environmental health and safety risks. The HIARNG will comply with this order.

4.9.2.1 Proposed Action

Implementation of the ICRMP for the planning period FY08 through FY12 would not result in significant impacts to air quality, surface water, or groundwater, and would not cause the release or mismanagement of hazardous/toxic materials or wastes. Because the proposed

action would not result in significant impacts to resources that may affect the health of children, it would not disproportionately impact children.

4.9.2.2 No-Action Alternative

Under the no-action alternative, no activities that would impact resources that have potential links to the health of children would occur; therefore, children would not be disproportionately impacted.

4.9.3 Environmental Justice

On February 11, 1994, President Clinton issued EO 12898, "Federal Actions to Address Environmental Justice in Minority and Low-Income Populations." The purpose of this EO is to avoid disproportionate placement of any adverse environmental, economic, social, or health impacts from federal actions and policies on minority and low-income populations. The President directed the EPA to ensure that agencies analyze the environmental effects on minority and low-income communities, including human health, social, and economic effects.

As a result of a number of factors, including high real estate costs and import fees, Hawai'i continues to sustain a large gap between the cost of living and family incomes. About 12% of Hawai'i's population is living below the poverty line, according to U.S. Census data. In 2000, low-income populations (household incomes less than \$17,463) comprised between seven to ten percent of Kaua'i, O'ahu, and Maui, with a slightly higher rate on the island of Hawai'i (15%).

4.9.3.1 Proposed Action

Implementation of the ICRMP would not result in significant impacts to air quality, surface water, or groundwater, and would not cause the release or mismanagement of hazardous/toxic materials or wastes. The proposed action would therefore not have any socio-economic impacts that would impact certain demographic groups and so would not disproportionately impact minority or low-income groups.

4.9.3.2 No-Action Alternative

Under the no-action alternative, no activities that would impact resources having potential links to the health or economic well-being of minority or low-income groups would occur; therefore, such groups would not be disproportionately impacted.

4.9.4 Hazardous Materials/Wastes

HIARNG's facilities and facilities located throughout the state support engineering operations, maintenance/repair of vehicles and equipment, weapons, artillery, and explosive storage, as well as academic and practical training (such as laboratory, field, and tactical exercises). Currently, the HIARNG has 15 structures or buildings throughout the state that generate hazardous waste products such as used oil, solvents, and batteries. Every HIARNG facility that potentially generates hazardous waste (i.e., handles, stores, or uses hazardous materials), does so in accordance to the Hazardous Material and Hazardous Waste Management Plan (2000). Building materials that contain hazardous materials, such as asbestos, may be present in older buildings. Herbicides may be used to control weeds on installations and in habitat restoration projects to control invasive plant species.

4.9.4.1 Proposed Action

Implementation of the ICRMP would require the use of some regulated hazardous materials (primarily herbicides) and materials associated with vehicle/equipment operation and maintenance. All hazardous/toxic materials used for ICRMP activities would be handled, stored, and used in accordance with regulations provided in the Hazardous Waste and Pesticide Management Plans.

Building renovations have the potential to expose workers to asbestos and other harmful materials. Workers are required to take precautions as needed to minimize exposure to these materials. The only currently planned renovation is at Battery Harlow, and a 1992 survey found no asbestos in that building.

4.9.4.2 No-Action Alternative

The no-action alternative would generate slightly less hazardous wastes, and this amount would be negligible compared to the amounts generated statewide by HIARNG. Likewise, not implementing ICRMP activities would have no affect on hazardous/toxic material storage, handling areas, and disposal.

4.10 Mitigation Measures

The proposed action would have no significant adverse environmental or socio-economic impacts. Correspondingly, the need for mitigation is limited to practices associated with specific projects such as routine precautions to avoid the introduction of non-native species (sanitizing personal gear and equipment between jobs), protecting non-target plants from herbicide overspray, and health and safety practices for workers renovating buildings that may contain asbestos, lead paint, or other hazardous materials.

4.11 Cumulative Effects

Cumulative impacts are considered "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or proponent is conducting the undertaking". Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Effects of the implementation of this plan on this area can be spatially considered along with the required implementation of ICRMPs from other military agencies, including the US Army, Navy, Marines, and Air Force, as well as other state and federal agencies. Total acreage covered by these plans is quite large compared with the 1293 acres covered by HIARNG's ICRMP. Approximately 260,000 acres in Hawai'i are owned or controlled by the military. For example, Pearl Harbor (administered by the US Navy) alone covers 10,000 acres and has 14,000 facilities that are more than 50 years old, as well as archeological sites. Approximately 37% (1.5 million acres) of Hawai'i is federally or state owned, and much of this may be subject to cultural resource planning similar to this effort. Integrated cultural resource management planning has occurred over the past 10 years, and will expand temporally as well as spatially.

Therefore, the effects of the implementation would be a minor incremental benefit toward the management and preservation of cultural resources in the State of Hawai'i.

4.12 Irreversible and Irretrievable Commitment of Resources

Sec. 102 (A) (v) of NEPA requires that environmental analysis include identification of ". . . any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented." Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that the use of these resources have on future generations. Irreversible effects primarily result from use or destruction of a specific resource (e.g., energy and minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result of the action (e.g., extinction of a threatened or endangered species or the disturbance of a cultural site).

Implementation of the ICRMP would result in minor commitments of such resources as fuel for vehicle use and herbicides used to restore native vegetation. Under the No Action Alternative, continued deterioration of buildings or inadvertent damage to archaeological sites would, in some cases, amount to a loss of that resource and the information that can be obtained from it.

Chapter 5. Comparison of Alternatives and Conclusions

5.1 Comparison of the Environmental Consequences of the Alternatives

No significant environmental or socio-economic effects have been identified from the proposed action. The expected environmental and socio-economic effects of the proposed action are summarized in Table 5.1

TABLE 5.1 Comparative Impact Summary					
Resource Area	Preferred Alternative	No-Action Alternative			
Land Use, Location, Mission	Minor impact – ICRMP programs not expected to significantly change the coverage of training lands, developed areas, or mission. Users are required by law to protect cultural resources regardless of the existence of an ICRMP.	Minor to major impact - mission and land use by HIARNG would not change, however, funding provided by ICRMP would not be available for needed staff positions. Inadvertent damage to resources could interrupt training.			
Air Quality	Minor impact – Small increases in fugitive dust, and exhaust emissions from vehicles.	No impact - Air quality would remain at present condition.			
Geography, Soils and Climate	Minor impact (soils only) – Soils may be temporarily disturbed during site activities. Best management practices would minimize disturbance.	No impact - Present condition would remain the same			
Noise	Minor impact – Occasional local increases in construction noise associated with building renovation	No change in noise levels, as no on-the- ground activities would take place.			
Biological Diversity	Minor impact—Actions may result in localized increase in native plant diversity, wildlife protection, and site protection.	Minor to major impact - Threats to biodiversity remain and cumulative damage to ecosystems likely later on.			
Native Ecosystems	Minor impact—Protective actions will prevent incremental damage to ecosystems. Minor benefits due to removing invasive weeds and replacing with native plant species.	Minor to major impact - Current damage to resources remains, and may worsen in the future.			
Vegetation	Minor impact—Removal of weeds, grubbing, or site clearing and other disturbance not expected to change existing vegetation composition over large scale.	Minor to major impact - Neglect of sites would lead to further invasion by weeds			
Endangered Species	Minor impact– Habitat enhancement and population protection in the planning period not expected to have drastic results on the species as a whole.	No impact – Present condition would remain the same.			
Streams and Wetlands	No impact – No activities planned near wetlands or streams.	No impact – Present condition would remain the same.			

TABLE 5.1 Comparative Impact Summary				
Resource Area	Preferred Alternative	No-Action Alternative		
Cultural Resources	Minor impacts – General field activities (surveying, mapping, clearing, data recovery, testing, grubbing, and construction activities) if conducted according to outlined SOPs to prevent damage to cultural sites, will pose no significant impacts to these resources. Overall, SOP's will have a long-term direct positive impact on cultural resources.	Minor to major impact – Cultural resources will continue to deteriorate or suffer inadvertent damage.		
Population Demographics	Minor impact - Preservation of cultural resources may strengthen knowledge and cultural identity.	No Impact – Current conditions will remain.		
Protection of Children	No impact – Implementation would not significantly impact air quality, surface water, or groundwater, and would not cause the release or mismanagement of hazardous/toxic materials or wastes.	No impact – Non-implementation would not affect resources that potentially have links to the health and well being of children or minority/low-income groups.		
Environmental Justice	No impact - The proposed action would also not have any socio-economic impacts that would impact certain demographic groups.	No impact – Non-implementation would not affect low-income populations.		
Hazardous and Toxic Materials and Wastes	Minor impact – Only small amounts would be used and no activities would occur near handling, storage, disposal, or remediation sites. Workers on restoration projects required by OSHA to use protective equipment when exposed to hazardous materials.	No impact – ICRMP non-implementation would not alter usage, storage, or disposal practices or affect remediation sites.		

5.2 Conclusions

The proposed action to implement the ICRMP for the planning period of FY08 through FY12 is required under AR 200-1 and DODI 4715.3. The ICRMP for which this EA has been prepared represents the first functional ICRMP that is proposed to be implemented throughout the HIARNG installation and facilities.

Based on the findings of this EA, implementation of the ICRMP for this planning period would have no significant direct or cumulative environmental or socio-economic impacts. Although the aim of the proposed project is to protect and enhance resident resources, affecting significant environmental changes is a lengthy process and inherently dependent on many unforeseen variables (i.e., environmental conditions, budgeting, personnel) which this EA cannot predict nor assess.

No mitigation measures are necessary for the proposed action. Any impact to natural and cultural resources that may result from ICRMP activities would be mitigated as part of a comprehensive, integrated program that the ICRMP represents. Based on the findings of this EA, we recommend that the ICRMP, as it is written and proposed, be implemented for the planning period FY08 through FY12, and that a Finding of No Significant Impact be issued for the proposed action.
References

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Uehara, Goro, 1983. Soils [of Hawai'i]. in A Cultural History of the Hawaiian Islands, Selected Readings II (E. Alison Kay, ed.). University of Hawai'i Press, Honolulu, Hawai'i.

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U.S. Fish and Wildlife Service, 1998. Endangered and Rare Species Surveys and Management Recommendations for Hawai'i Army National Guard Lands on the Island of Oahu. U.S. Department of Interior, Fish and Wildlife Service, Pacific Island Office, Honolulu, Hawai'i.

US Census Bureau: http://quickfacts.census.gov/qfd/states/15000.html

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Appendix A:

List of Acronyms

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Appendix A: List of Acronyms

AR	Army Regulation
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DLNR	Department of Land and Natural Resources
EA	Environmental Awareness
EO	Executive Order
FNSI	Finding of No Significant Impact
FY	Fiscal Year
GIS	Geographic Information System
HIARNG	Hawai'i Army National Guard
HRS	Hawai'i Revised Statutes
ICRMP	Integrated Cultural Resources Management Plan
ICUZ	Installation Compatible Use Zone
ITAM	Integrated Training Area Management
LTA	Land Training Area
MILCON	Military Construction
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NEPA	National Environmental Policy Act
SHPD	State Historic Preservation Department
SOP	Standard Operating Procedure
ТСР	Traditional Cultural Places
USACHPPM	US Army Center for Health Promotion and Preventative Medicine
USFWS	US Fish and Wildlife Service

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Appendix B:

Agency Consultation

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LINDA LINGLE GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

Environmental Office

Mr. Patrick Leonard, Field Supervisor United States Fish and Wildlife Service 300 Ala Moana Boulevard, Suite 3122 P. O. Box 50088 Honolulu, Hawaii 96850

Dear Mr. Leonard:

Subject: Endangered Species Act, Section 7 Interagency Consultation: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed is a CD-ROM copy of the 2006-2010 Draft ICRMP, with appendices, and a hard copy of the accompanying Draft EA for your review. The ICRMP is a five-year management plan required under Army Regulation 200-4, developed to manage the archaeological and historical sites on HIARNG properties.

As required by the Endangered Species Act, Section 7, the HIARNG is requesting interagency consultation regarding the potential impacts of implementing the ICRMP. The plan is summarized in Chapter 2 of the EA and described in detail in Chapter 2.2 of the ICRMP. Resource descriptions and anticipated consequences are covered in Chapters 4 and 5 of the EA, Endangered Species specifically in Chapter 4.5.4. We request that your organization review our findings and conclusions and concur or comment in a letter to the HIARNG by January 31, 2006. Please address comments on the EA and the ICRMP (if any) separately. If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Karl Buermeyer, NEPA Administrator, at (808) 733-4359.

Sincerely,

MurA1,7. Dee

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

Enclosures

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LINDA LINGLE GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

Environmental Office

Ms. Sunny Greer, Director Cultural Programs State Historic Preservation Division 601 Kamokila Blvd., Suite 555 Kapolei, Hawaii 96707

Dear Ms. Greer:

Subject: National Historic Preservation Act (NHPA), Section 106 Consultation: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are two CD-ROM copies of the 2006-2010 Draft ICRMP, with appendices, and the accompanying Draft EA for your review. Section 106 of the NHPA of 1966 requires Federal agencies to take into account the effects of their undertakings on historic properties and to consult with our State's Historic Preservation Department to determine if there are any adverse affects in proceeding with implementing the plan. The HIARNG seeks concurrence from your office to commence this five-year management plan, a plan required under Army Regulation 200-4 to manage the archaeological and historical sites on HIARNG properties.

We request that your organization review the enclosed documents and concur or comment on them in writing to the HIARNG by January 31, 2006.

If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G.

Major General Hawaii National Guard Adjutant General

Enclosures

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.

LINDA LINGLE GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

Environmental Office

Ms. Haunani Apoliona, Chairperson Office of Hawaiian Affairs 711 Kapi'olani Boulevard, Suite 500 Honolulu, Hawaii 96813

Dear Ms. Apoliona:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed is a CD-ROM copy of the 2006-2010 Draft ICRMP, with appendices, for your review and comments. The ICRMP is a fiveyear management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments by January 31, 2006. If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

Environmental Office

Mr. Micah Kane, Chairman Department of Hawaiian Home Lands 1099 Alakea Street, Suite 2000 Honolulu, Hawaii 96813-4512

Dear Mr. Kane:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed is a CD-ROM copy of the 2006-2010 Draft ICRMP, with appendices, for your review and comments. The ICRMP is a five-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments by January 31, 2006. If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

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ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

LINDA LINGLE GOVERNOR



STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

Environmental Office

Ms. Nalani Kahoano Gersaba, President O'ahu Council Association of Hawaiian Civic Clubs P. O. Box 37549 Honolulu, Hawaii 96837

Dear Ms. Gersaba:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are two CD-ROM copies and two hard copies of the 2006-2010 Draft ICRMP, with appendices, for your review and comments. The ICRMP is a five-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments by January 31, 2006. If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

Enclosures .

ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL THIS PAGE INTENTIONALLY LEFT BLANK

Appendix C:

Public Involvement

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LIST OF PERSONS WHO MAILED IN COMMENTS TO ICRMP &/OR EA

1. Department of the Air Force, Pacific Air Forces

Mr. Ronnie D. Lanier Chief, Environmental Flight 15 CES/CEV 75 H Street Hickam AFB, HI 96853-5233

Valerie Curtis

*7 comments, only on ICRMP.

 County of Kaua'i Planning Department 4444 Rice Street, Suite A473 Lihu'e, HI 96766-1326

Rick Tsuchiya

***3 comments**, only on ICRMP; with request for extension and attendance at 6/01/06 meeting.

 County of Hawai'i Planning Department 101 Pauahi Street, Suite 3 Hilo, HI 96720-3043

Christopher J. Yuen, Planning Director

*6 comments, only on ICRMP.

4. State of Hawai'i Office of Environmental Quality Control 235 South Beretania Street, Suite 702 Honolulu, HI 96813

Genevieve Salmonson

*2 Comments, only on EA.

Total Comments: 18; 16 for ICRMP and 2 for EA.

LIST OF PERSONS WHO CALLED REQUESTING COPIES OF ICRMP & EA

	Date	Name & Address	When Mailed or Comment Info.
1.	4/10/06	William Aila 86-630 Lualualei Homestead Road Waianae, HI 96792 Ph. 330-0376	4/13/06 (w/Delivery confirmation)
2.	4/13/06	Dr. Willliam W. Steiner Dean, University of Hawaii at Hilo College of Agriculture, Forestry, and 200 West Kawili Street Hilo, HI 96720	4/25/06 (w/Delivery confirmation) (4/24 a "5-4-9" day—no one in Pub.) Natural Resource Management
		Email: steiner@hawaii.edu	EA & App. "C" emailed on 4/21/06
✓3.	4/19/06	Valerie Curtis	Phoned in comments regarding Bellows RTI section of ICRMP. Monica asked if she could mail in her comments addressed to the TAG.
√ 4.	4/27/06	Shanlee Jimenez, County of Kauai Planning Commission	Phoned in to let us know that the Kaua'i Historic Preservation Review Commission has the Draft ICRMP & EA on their meeting agenda for Thurs., 5/4/06.
5.	4/27/06	Cruz Vina, Pearl City Neighborhood Board, Ph. 456-3480, email: vinajrc001@hawaii.rr.com	Requested me or Dean to attend their committee meeting (9 member w/2 vacancies) on Tues., 5/16/06 (7pm, Highlands Int. School) to explain the documents to them.

Public Notice printed in primary newspapers for all facilities:

PUBLIC NOTICE

The Hawaii Army National Guard (HIARNG) invites the public to review its Draft Integrated Cultural Resources Management Plan (ICRMP) and the accompanying Draft Environmental Assessment (EA) for its facilities on Hawai'i, Kaua'i, Maui, Moloka'i, and O'ahu.

The National Historic Preservation Act of 1966, as amended in 2000, requires the HIARNG to prepare an ICRMP to address cultural resource management in conjunction with military training requirements. The National Environmental Policy Act of 1972 (NEPA) requires that the environmental consequences of implementing the ICRMP be assessed, and that organizations, agencies, groups and individuals be consulted and afforded the opportunity to review and comment on the content of the ICRMP and the EA.

Those interested in reviewing these documents may do so by obtaining a copy from the HIARNG Environmental Office at 808-733-4359, or by reviewing a copy at the following Public Libraries: Hawai'i State Library, Kane'ohe, Pearl City, Kaimuki, Lihu'e, Moloka'i, Kahului, Hilo, and Kailua-Kona. Public comments must be received no later than May 8, 2006, and may be sent to: Hawaii Army National Guard, Environmental Office, ATTN: NEPA Administrator, 3949 Diamond Head Rd, Honolulu, HI, 96816.



April 8, 2006

Hawai'i Army National Guard Integrated Cultural Resources Management Plan (HRS 343 DEA) Joint NEPA

District:	Hawaiʻi, Kauaʻi, Maui, Molokaʻi & Oʻahu
TMK:	Statewide
Proposing	
Agency:	Hawai' i Army National Guard
	3949 Diamond Head Rd., Honolulu, HI 96816
	Contact Karl Buermeyer (733-4359)
Determination	
Agency:	Same as above.
Public Comment	
Deadline:	May 8, 2006
Status:	Draft environmental assessment (DEA) notice pending 30-day public comment. Address com- ments to the proposing agency with copies to the consultant and OEQC.
Permits	
Required:	Section 106 of the National Historic Preserva- tion Act of 1966, NEPA, Chapter 6E, HRS.

The Hawai'i Army National Guard's Integrated Cultural Resources Management Plan (ICRMP) is a five-year plan that presents management protocols and formalizes standard operat-

ing procedures (SOPs) for the fiscal years 2006-2010 (FY06 through FY10), and is required by Army Regulation 200-4 (AR 200-4) Cultural Resources and Department of Defense Instruction 4751.3 (DoDI 4751.3). These protocols and SOPs support the training mission by assuring compliance with State and Federal cultural resources and historic sites regulations for properties under the control of the Hawai'i Army National Guard (HIARNG). These resources include archaeological sites, Native Hawaiian Traditional Cultural Properties (TCPs) and sacred sites, objects of cultural and historical significance, and structures of historical and architectural significance. This ICRMP offers facility specific protocols to identify, evaluate, preserve, maintain, and protect the HIARNG's cultural resources and historic properties. It identifies research and data col-

lection needs, and offers strategies based on these needs. It provides methods for tracking and monitoring the conditions of the installation's resources over a five-year period. The ICRMP assures compliance by establishing a framework for consultation between the HIARNG, the National Guard Bureau (NGB), the Native Hawaiian community, the Office of Hawaiian Affairs (OHA), the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), other branches of the Department of Defense (DoD), and the public. The ICRMP integrates cultural resources management with current mission activities. The ICRMP is the commander's decision document for cultural resources compliance and management and identifies potential conflicts between the installation's mission and protection of its resources, and documents how those conflicts may be resolved to maintain the use of land for mission purposes. To obtain copies of the ICRMP and EA, please contact Karl Buermeyer, NEPA Administrator of the HIARNG Environmental Office, at 3949 Diamond Head Road, Honolulu, Hawai'i, 96816-4495. The phone number is 733-4359. The document is also available at the regional public libraries on the islands of Hawai'i, Kaua'i, Maui, Moloka'i, and O'ahu.



The Environmental Notice

Office of Environmental Quality Control

Page 15

GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495 MAD. O. O. 2000C

MAR 2 2 2005

Ms. Genevieve Salmonson, Director Office of Environmental Quality Control 235 South Beretania Street Leiopapa A Kamehameha, Suite 702 Honolulu, Hawaii 96813

Dear Ms. Salmonson:

Subject: Draft Environmental Assessment(EA) for the 2006-2010 Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are two copies each of the 2006-2010 Draft ICRMP and Draft EA, and a completed OEQC Publication Form. Also enclosed is a CD ROM with .pdf versions of the ICRMP and EA and a project summary. The ICRMP is a 5-year management plan required under Army Regulation 200-4, developed to manage the archaeological and historical sites on HIARNG properties.

As required by HRS Chapter 343, we would like to publish the notice of availability of the draft EA in the April 8 issue of the Environmental Notice.

If there are any questions, please contact Mr. Dean Norwood, Interim Environmental Protection Specialist, at (808) 368-4490, or Mr. Karl Buermeyer, NEPA Administrator, at (808) 733-4359.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

LINDA LINGLE



STATE OF HAWAII OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET SUITE 702 HONOLULU, HAWAII 96813 TELEPHONE (808) 586-4185 FACSIMILE (808) 586-4186 E-mali: ceqc @health.state.hi us

May 8, 2006

Major General Robert G. F. Lee, Adjutant General Karl Buermeyer State of Hawai'i, Department of Defense Hawai'i Army National Guard 3949 Diamond Head Road Honolulu, Hawai'i 96816

Dear General Lee and Mr. Buermeyer:

Having reviewed the draft environmental assessment for the Hawai'i Army National Guard Integrated Cultural Resources Management Plan (Joint 343-NEPA) Statewide, the Office of Environmental Quality Control offers the following comments for your review and response.

- 1. **Draft Integrated Cultural Resources Management Plan:** The Draft Integrated Cultural Resources Management Plan (plan) was submitted as a separate document from the draft environmental assessment. Because the description of the environmental setting for each of the seventeen facilities is contained in the plan, the draft environmental assessment needs to indicate that the plan is an "integral part of the draft environmental assessment." We would respectfully recommend that this be accomplished by the placement of language to that effect in the Executive Summary of the draft environmental assessment, and in Section 1.3 (Scope of the Document) on page 3 of the draft environmental assessment.
- 2. Early Consultation Under Section 11-200-9(a)(1), Hawaii Administrative Rules: Section 11-200-9(a)(1), Hawai'i Administrative Rules requires the proposing agency to require the applicant to seek the advice and input of the lead county agency responsible for implementing the county's general plan in which the proposed action is to occur, and to consult with other agencies

having jurisdiction or expertise as well as citizen groups and individuals which the approving agencies reasonably believes to be affected. Section 11-200-10 (3) notes that the environmental assessment must identify agencies, citizen groups, and individuals consulted. Please ensure that the various planning agencies of the four county governments in the State have been notified of the proposed plan.

Thank you for the opportunity to comment. If there are any questions, please contact Mr. Leslie Segundo, Environmental Health Specialist, at (808) 586-4185.

Sincerely,

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GENEVIEVE SALMONSON Director

GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

Environmental Office

24 April 2006

Dr. William W. Steiner Dean, University of Hawaii at Hilo College of Agriculture, Forestry, and Natural Resource Management 200 West Kawili Street Hilo, Hawai'i 96720

Dear Dr. Steiner:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed is a cd-rom of the 2006-2010 Draft ICRMP and of the Draft Environmental Assessment (EA), as you requested. The ICRMP is a five-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that any comments you have pertaining to these documents be received by our office no later than May 8, 2006. If you have any questions, please contact me at 368-4490, or Ms. Monica Bacon, Historical Research Associate, at 733-4360.

Sincerely,

the Housen

Dean Norwood Environmental Protection Specialist Hawaii Army National Guard

GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAH DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96818-4495

Environmental Office

13 April 2006

Mr. William Aila 86-630 Lualualei Homestead Road Waianae, Hawai'i 96792

Dear Mr. Aila:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and of the Draft Environmental Assessment (EA), as you requested. The ICRMP is a five-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that any comments you have pertaining to these documents be received by our office no later than May 8, 2006. If you have any questions, please contact me at 368-4490, or Ms. Monica Bacon, Historical Research Associate, at 733-4360.

Sincerely,

du local

Dean Norwood Environmental Protection Specialist Hawaii Army National Guard

LINDA LINGLE GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

Environmental Office

APR 1 2 2006

Mr. Micah A. Kane, Chairman Department of Hawaiian Home Lands P.O. Box 1879 Honolulu, Hawai'i 96805

Dear Mr. Kane:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We received the three recommendations that your office submitted on January 19, 2006, in response to our December 8, 2005, to January 31, 2006, review period for Native Hawaiian Organizations, and those comments are addressed in the Draft ICRMP. We request that your organization send to the HIARNG, in writing, any comments for this current version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

Wide

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General



MICAH A. KANE CHAIRMAN HAWAIJAN HOMES COMMISSION

BEN HENDERSON DEPUTY TO THE CHAIRMAN

KAULANA H. PARK EXECUTIVE ASSISTANT

STATE OF HAWAII DEPARTMENT OF HAWAIIAN HOME LANDS

P.O. BOX 1879 Honolulu, hawaii 96805

January 19, 2006

Major General Robert G.F. Lee Hawaii National Guard 3949 Diamond Head Road Honolulu, Hawaii 96816

Dear General Lee:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Thank you for allowing the Department of Hawaiian Home Lands (DHHL) to review and comment of your 2006-2010 Draft ICRMP. This plan for the management of archaeological and historical sites on HIARNG properties is a welcome step towards ensuring the protection and preservation of the Hawaiian culture and historical Hawaiian sites.

DHHL has reviewed your plan and respectfully submits three recommendations.

 We realize that Table 4, on page 43, summarizes a list of Native Hawaiian Organizations (NHO) that served as consultees in the development of the ICRMP, and also qualify as NHO as defined by NAGPRA. However, perhaps a listing of all NAGPRAqualified NHO as an appendix would prove to be useful to your staff when implementing a particular Standard Operating Procedure (SOP) in a particular island or district. For example, should inadvertant burials be discovered in Bellows Air Force Station, Ko'olaupoko, O'ahu, contact information on NHOs in Ko'olaupoko, as well as contact information for the local Civic Clubs, Hawaiian Homestead Association(s), and the appropriate district representative of the O'ahu Island Burial

LINDA LINGLE

GOVERNOR STATE OF HAWAII • Major General Robert G.F. Lee January <u>1</u>9, 2006 Page 2

1

Council, would prove beneficial to your staff in facilitating the consultation process. Also, the copy on Page 42 incorrectly refers to the NHO listing as Table 3.

- SOP #6 Procedures where Human Remains are Involved. Though rare, a separate SOP for "Intentional Excavations" of human remains should be developed, as stipulated in NAGPRA.
- SOP #5, Inadvertent Discovery of Cultural Resources, Procedure 2, makes reference to a "Notification Flowchart on Page 37 in Chapter 7." This reference should read "Notification Process on Page 48 in Chapter 7."

Should you have any questions or concerns, please feel free to contact Kamana'o Mills at Ph. 586-3822

Aloha and mahalo,

Micah A. Kane, Chairman Department of Hawaiian Home Lands

LINDA LINGLE GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Ms. Haunani Apoliona, Chairperson Office of Hawaiian Affairs 711 Kapi`olani Boulevard, Suite 500 Honolulu, Hawai`i 96813

Dear Ms. Apoliona:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We received the recommendation that your office submitted on March 20, 2006, in response to our December 8, 2005, to January 31, 2006, review period for Native Hawaiian Organizations, and your concern is addressed in the Draft ICRMP. We request that your organization send to the HIARNG, in writing, any comments for this current version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

PHONE (808) 594-1888

FAX (808) 594-1865



STATE OF HAWAI'I OFFICE OF HAWAIIAN AFFAIRS 711 KAPI'OLANI BOULEVARD, SUITE 500 HONOLULU, HAWAI'I 96813

HRD06/2161

March 20, 2006

Robert G. F. Lee Major General Hawaii National Guard Adjutant General State of Hawaii Department of Defense Office of the Adjutant General 3949 Diamond Head Road Honolulu, HI 96816-4495

RE: Request for review and comment of the 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

Dear Major General Robert G. F. Lee,

The Office of Hawaiian Affairs (OHA) is in receipt of your December 6, 2006, request for comments on the above-proposed project, which is a five-year management plan required under Army Regulation 200-4, developed to manage the archeological and historical sites of HIARNG. OHA apologizes for the delayed response and offers the following comments.

OHA reminds HIARNG that per the Native American Graves Protection and Repatriation Act, if any Native Hawaiian iwi kūpuna are found, the Office of Hawaiian Affairs is to be notified. We would further appreciate continued consultation with lineal and cultural descendents of potentially affected areas to assure that any cultural impacts are limited or mitigated, if not abolished. We will rely on HIARNG's assurances that should iwi kūpuna or Native Hawaiian cultural or traditional deposits be found during project activities, work will cease, and the appropriate agencies will be contacted pursuant to applicable law.

** 1

Major General Robert G. F. Lee March 20, 2006 Page 2

Thank you for the opportunity to comment. We look forward to reviewing the public draft for review and the final ICRMP, as well as the forthcoming annual updates. If you have further questions, please contact Heidi Guth at (808) 594-1962 or e-mail her at <u>heidig@oha.org</u>.

Sincerely,

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Cliplen 1 's

Clyde W. Nāmu'o Administrator



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Ms. June N. Cleghorn, Manager Marine Corp Base Hawai'i, EC & PD Cultural Resources Program Building 1360 MCBH Kane'ohe Bay, Hawai'i 96863

Dear Ms. Cleghorn:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

RÓBERT G. F. LEE Major General Hawaii National Guard Adjutant General

LINDA LINGLE GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Mr. Jeffrey N. Dodge, Planner NAVFAC Pacific 258 Makalapa Drive, Suite 100 Honolulu, Hawai'i 96860

Dear Mr. Dodge:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

RÓBERT G. F. LEE Major General Hawaii National Guard Adjutant General

GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Dr. Laurie J. Lucking, Manager DPW, Environmental Division Cultural Resources Program 947 Wright Avenue Schofield Barracks, Hawai'i 96857

Dear Dr. Lucking:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

RÓBERT G. F. LEE Major General Hawaii National Guard Adjutant General


ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495 AYR 1 2 2006

Environmental Office

Mr. Gary O'Donnell, Chief Hickam Air Force Base Environmental Planning 15 CES/CEVP, 75 H. Street Hickam AFB, Hawai'i 96853

Dear Mr. O'Donnell:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

KOBERT G. F. LEE Major General Hawaii National Guard . Adjutant General

DEPARTMENT OF THE AIR FORCE PACIFIC AIR FORCES



0 8 MAY 2006

Mr. Ronnie D. Lanier Chief, Environmental Flight 15 CES/CEV 75 H Street Hickam AFB HI 96853-5233

Major General Robert G. F. Lee Hawaii National Guard Office of the Adjutant General 3949 Diamond Head Road Honolulu Hawaii 96816-4495

Dear General Lee

Thank you for the opportunity to review and comment on the 2006-2010 Draft Integrated Cultural Resource Management Plan (ICRMP) and Draft Environmental Assessment (EA) for all installations of the Hawaii Army National Guard (HIARNG). Attached are our comments and suggestions regarding the ICRMP. We have no comments for the EA.

If you have any questions or want further information regarding our comments and suggestions, please feel free to call our Contract Inter-Agency Specialist, Ms. Valerie Curtis at 449-1584 ext 251 or via e-mail at <u>valerie.curtis@hickam.af.mil</u>.

Sincerely

RONNIE D. LANIER

Attachment: PACAF Form 225



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU; HAWAII 96816-4495 APR 1 2 2006

Environmental Office

Mr. Wilson Kekoa Ho, Chairperson Waimanalo Neighborhood Board 41-696 Kamehameha Highway Waimanalo, Hawaiʻi 96795

Dear Mr. Ho:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

GOVERNOR



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Mr. Ben Acohido, Chairperson Wahiawa Neighborhood Board 1729 California Avenue Wahiawa, Hawai'i 96786

Dear Mr. Acohido:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Mr. Albert Fukushima, Chairperson Pearl City Neighborhood Board 1841 Palamoi Street Pearl City, Hawai'i 96782

Dear Mr. Fukushima:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Ms. Maeda Timson, Chairperson Makakilo/Kapolei/Honokai Hale Neighborhood Board 92-684 Nohona Street Kapolei, Hawai`i 96707

Dear Ms. Timson:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

RÓBERT G. F. LEE Major General Hawaii National Guard Adjutant General



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495 APR 1 2 2006

Environmental Office

Ms. Kiersten Faulkner, Executive Director Historic Hawai'i Foundation 680 Iwilei Road Dole Office Building Tower, Suite 690 Honolulu, Hawai'i 96817

Dear Ms. Faulkner:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

RÓBERT G. F. LEE Major General Hawaii National Guard Adjutant General



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495 APR 1 2 2006

Environmental Office

Mr. Ralston H. Nagata, Administrator Department of Land and Natural Resources Division of State Parks P.O. Box 621 Honolulu, Hawai'i 96809

Dear Mr. Nagata:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Mr. Samuel Kalalau III, Chairperson County of Maui, Department of Planning Maui County Cultural Resources Commission 200 South High Street, 7th Floor Wailuku, Hawai'i 96793

Dear Mr. Kalalau:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General



STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Mr. Randy Wichman, Commissioner County of Kau'ai, Department of Planning Historic Preservation Review Commission 4444 Rice Street Lihu'e, Hawai'i 96766

Dear Mr. Wichman:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

RÓBERT G. F. LEE Major General Hawaii National Guard Adjutant General

Enclosures

ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

COUNTY OF KAUAI PLANNING DEPARTMENT 4444 RICE STREET, SUITE A473 LIHUE, KAUAI, HAWAII 96766-1326

MEMORANDUM

DATE: May 9, 2006

TO: Ms. Monica Bacon Historical Research Associate State of Hawaii, Department of Defense Office of the Adjutant General 3949 Diamond Head Road Honolulu, HI 96816-4495

FROM: Kauai Historic Preservation Review Commission

SUBJECT: Request for comments on the 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment EA for all installations of the Hawaii Army National Guard (HIARNG).

This is to inform you that the Kauai Historic Preservation Review Commission (KHPRC) met on May 4, 2006 to review the above-mentioned project.

The KHPRC would like to thank the HIARNG for its research and documentation and offered the following comments:

- The Kapaa Armory will become 50 years old in 2007 and will become eligible for listing as a historic resource and as such will be subject to the historic preservation review process.
- There is a question regarding the sensitivity analysis for both the Hanapepe and Kekaha sites as we do not understand the criteria for the definitions for the sensitivity analysis and would like further explanation with the possibility of upgrading the analysis to medium sensitivity on these 2 sites especially with the sand dunes at Kekaha.
- Before any changes or projects are undertaken, efforts to solicit public input and the opportunity for review by cultural interests/organizations should take place as well as review by the State Historic Preservation Division.

Because of the complexity of the documents, the KHPRC asked if the deadline for comments could be extended and if a representative from HIARNG attend the June 1, 2006 KHPRC meeting to further explain and discuss these concerns.

Please contact Rick Tsuchiya at (808) 241-6677 should you have any questions regarding this matter.

cc: Susan Tasaki, State Historic Preservation Division Nancy McMahon, State Historic Preservation Division

e.



ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

APR 1 2 2006

Environmental Office

Mr. Chris Yuen, Director County of Hawai'i, Planning Department Aupuni Center 101 Pauahi Street, Suite 3 Hilo, Hawai'i 96720

Dear Mr. Yuen:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

We request that your organization send to the HIARNG, in writing, any comments for this current draft version by May 8, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 368-4490, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

Harry Kim Mayor



Christopher J. Yuen Director Brad Kurokawa, ASLA LEED® AP

Deputy Director

County of Hawaii PLANNING DEPARTMENT 101 Pauahi Street, Suite 3 • Hilo, Hawaii 96720-3043

(808) 961-8288 • FAX (808) 961-8742

May 2, 2006

Mr. Robert G. F. Lee Major General Hawaii National Guard Office of the Adjutant General 3949 Diamond Head Road Honolulu, HI 96816-4495

Dear General Lee:

Subject:

Review of Draft Environmental Assessment (DEA) & Draft Integrated Cultural Resources Management Plan (ICRMP) for All Installations of the Hawaii Army National Guard (HIARNG)

This is in response to your letter dated April 12, 2006 requesting our comments on the abovereferenced documents. The HIARNG proposes to implement the statewide ICRMP on seventeen (17) facilities, four of which are located on the island of Hawai'i. An Environmental Assessment is also required by the National Environmental Policy Act and HRS 343 (for installations involving State lands) in order to consider the potential environmental and socio-economic consequences of implementing any actions proposed in the ICRMP. Our comments regarding the four installations on the island of Hawai'i are limited to the scope of the ICRMP and DEA which focus on impacts to cultural resources that may be present on the subject properties.

1. The Hawaii County Zoning Code Section 25-4-11 (c) states: "Public uses, structures, and buildings and community buildings are permitted uses in any district, provided that the director has issued plan approval for such use." Regardless of the County zoning of the parcels that comprise the four HIARNG installations, use by the Hawai'i Army National Guard is considered to be a public and permitted use. However, prior to altering and/or expanding existing structures or adding new ones, certain permits are required which include a Plan Approval by the Planning Director and any applicable building or grading/grubbing permits.

General Robert G. F. Lee Page 2 May 2, 2006

- 2. The Honoka'a Armory and Motor Vehicle Storage Building (MVSB) are located on TMKs: 4-5-006:071 and 4-5-003:20. Please correct the TMK numbers on page 62 of the ICRMP. The installation's locations have been extensively modified. While the probability is low that any historic, prehistoric or cultural properties are present, Standard Operating Procedure (SOP) #5 should be followed in the event of inadvertent discovery of cultural materials.
- 3. The Kea'au Armory located on TMK: 1-6-003:058, has a known historic cemetery on-site. The access road to the parcel is the old Waiakea Consolidated Railroad right-of-way. While the treatment of inadvertent discovery of human remains is described in the document, no mention is made of any mitigative measures should sites be discovered in connection with the use of the old railroad right-of-way.
- 4. The Kealakekua Armory is located on TMK: 8-1-002:056. An incorrect TMK number is given on page 70 of the ICRMP. The historic Quonset Huts on the property will be further evaluated in terms of historic value. While the probability is low that any historic, prehistoric or cultural properties are present, SOP #5 should be followed in the event of inadvertent discovery of cultural materials.
- 5. The Keaukaha Military Reservation (KMR) is identified as being located on TMK: 2-1-012:003. However, the total acreage of this TMK is only 442.486 acres. The ICRMP states on page 75 that the installation's total acreage is 506.25. Please indicate the other TMKs on which this installation is sited. A number of historic structures and other features are located on this installation in addition to a few prehistoric sites, including a portion of the ancient foot trail, the *ala loa* (a.k.a. "The Puna Trail"). Since only 60 percent of the KMR has been inventory level surveyed and un-surveyed portions of the subject property are thickly vegetated, more prehistoric and historic preservation program "currently being developed" (referred to on page 80)? Which agency(ies) must review and approve the historic preservation program? Archaeological survey should be conducted prior to any grubbing or grading in vacant and previously undisturbed portions of the KMR.
- 6. 4.8.2 of the DEA indicates the HIARNG's intention of consulting with Native Hawaiian organizations and Native Hawaiians that may be impacted by the implementation of the ICRMP, even though such consultation is technically not required by federal laws. Isn't such consultation required by State of Hawai'i law (HRS 343) for uses of state or county owned lands? Will a consultation process be developed as part of the ICRMP that ensures meaningful and timely input by Native Hawaiian organizations and individuals, as well as other ethnic/cultural groups, when applicable?

General Robert G. F. Lee Page 3 May 2, 2006

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Thank you for the opportunity to review and comment on the ICRMP and DEA. Should you have questions, please contact Deborah Chang of my staff at 961-8288, Ext. 254.

Sincerely, un

CHRISTOPHER J. YUEN Planning Director

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ROBERT G. F. LEE MAJOR GENERAL ADJUTANT GENERAL

GARY M. ISHIKAWA BRIGADIER GENERAL DEPUTY ADJUTANT GENERAL

STATE OF HAWAII DEPARTMENT OF DEFENSE OFFICE OF THE ADJUTANT GENERAL 3949 DIAMOND HEAD ROAD HONOLULU, HAWAII 96816-4495

JUL 27 2006

Environmental Office

Mr. Henry Eng, Director City and County of Honolulu Department of Permitting and Planning 650 South King Street Honolulu, Hawai'i 96813

Dear Mr. Eng:

Subject: 2006-2010 Draft Integrated Cultural Resources Management Plan (ICRMP) and Draft Environmental Assessment (EA) for All Installations of the Hawaii Army National Guard (HIARNG)

Enclosed are copies (one of each) of the 2006-2010 Draft ICRMP and the Draft EA, along with a CD-ROM containing both documents, for your review and comments. The ICRMP is a 5-year management plan required under Army Regulation 200-4. The plan is developed to manage the archaeological and historical sites on HIARNG properties.

The Public Review period was from April 8 to May 8, 2006, and we apologize for the oversight in not submitting these documents to you at that time. We request that your organization send to the HIARNG, in writing, any comments by August 14, 2006. If there are any questions, please contact Mr. Dean Norwood, Environmental Protection Specialist, at (808) 672-1282, or Ms. Monica Bacon, Historical Research Associate, at (808) 733-4360.

Sincerely,

ROBERT G. F. LEE Major General Hawaii National Guard Adjutant General

DEPARTMENT OF PLANNING AND PERMITTING

CITY AND COUNTY OF HONOLULU

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MUFI HANNEMANN MAYOR



HENRY ENG, FAICP DIRECTOR

DAVID K. TANOUE DEPUTY DIRECTOR

2006/ELOG-1899(ry)

August 21, 2006

Robert G. F. Lee, Major General Office of the Adjutant General Department of Defense State of Hawaii 3949 Diamond Head road Honolulu, Hawaii 96816-4495

Dear General Lee:

Re: Integrated Cultural Resources Management Plan for Hawaii Army National Guard Installations and Draft Environmental Assessment

We have reviewed the subject documents and have no comments to offer. Thank you for the opportunity to comment.

If you have any questions, please contact Raymond Young of our staff at 527-5839.

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Very truly yours,

Henry Eng, FAICP, Director Department of Planning & Permitting

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