

Harry Huyler  
147 Oko St Apt 3  
Kailua, HI 96734

11 Jun 2012

Department of the Navy, Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100 -- Attn: MV-22/H-1 EIS Project Manager (EV21)  
Pearl Harbor, HI 96860-3134

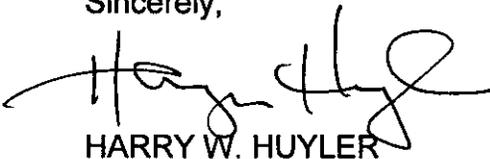
Dear EIS Project Manager EV-21,

The Baseline TABLE 1.1-1 in the "FINAL Environmental Impact Statement Volume 1 of 2" includes no "as of" date.

The statistics included in that Table and the 2 following table may be inconclusive due to outdated statistics. The Night Operations listed in Table 1.1-1 seem to show data that is not relevant to the past 10-20 years.

The MCBH also seems to be generating more aircraft engine noise sporadically around the hours of 530 to 6AM in the mornings of the past 3-6 months and a few times between 10 and 1030PM.

Sincerely,



HARRY W. HUYLER

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

June 14, 2012

I am totally against any increase in activities at Marine Corps Base in Kaneohe.

The noise level increase we are supposed to tolerate will severely decrease the quality of life for the citizens of Kaneohe. With two new runways planned, even more air traffic will affect our town and the location of the runways will cause more planes to fly over houses in our town.

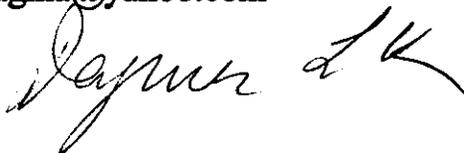
At present planes practice take offs and landings on a daily basis.

The planes fly directly over Heeia Kea pier, Heeia state park, King intermediate school, Alii Shores subdivision, Lilipuna Road and the University of Hawaii marine biology classrooms on Coconut Island. The planes fly at an altitude of no more than 200 to 300 feet above sea level and many, many times fly directly over the homes in Alii Shores and Lilipuna Road, even though they are supposed to fly over the ocean only and at a higher altitude. Well, they never observe these rules. Anyone living in that area will verify what I am stating here.

With more aircraft activity at the base there is also the possibility for mishaps and crashes. We already had one of those when a copter crashed onto the sand bar in Kaneohe Bay, polluting the fragile bay with jet fuel and closing the sand bar to local residents who spend their leisure time there every weekend.

I feel strongly that if the MV-22 and H-1 aircraft needs to be based on Oahu, they should be at Barber's Point where there is lots of vacant land an existing runway and no civilian population to speak of.

Dagmar Kau  
45-207 Mahalani Circle  
Kaneohe, HI 96744  
808 235 1307  
Kaomagma@yahoo.com



**mv22h1eis**

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**From:** Robert G [hawaiigoe@gmail.com]

**Sent:** Thu 6/14/2012 10:32 AM

**To:** mv22h1eis

**Cc:**

**Subject:** Attn: EV21, MV-22/H-1

**Attachments:**

Aloha !

I am a 42 year Big Island resident of the Kona district .

I 100% WELCOME the new USMC MV-22 squadrons and the HMLA's to our Big Island skies and airports

ALL airports

It will be thrilling to see them ! A Free airshow !

We LOVE our troops and aviators over here and I encourage you to ignore the ground static and the NIMBYs and e kome mai ! ( come on in )

Aloha and again ....Welcome !

out

Robert Gowan  
Kona, Hawaii  
808 987-7018



**William P. Kenoi**  
*Mayor*

**William T. Takaba**  
*Managing Director*

**Dora Beck, P.E.**  
*Acting Director*

**Hunter Bishop**  
*Deputy Director*

## County of Hawai'i

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

25 Aupuni Street • Hilo, Hawai'i 96720  
(808) 961-8083 • Fax (808) 961-8086  
[http://co.hawaii.hi.us/directory/dir\\_envmng.htm](http://co.hawaii.hi.us/directory/dir_envmng.htm)

June 15, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Attention: MV-22/H-1 EIS Project Manager (EV21)

RE: EIS for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawai'i

We have no comments to offer on the subject EIS.

Thank you for allowing us to review and comment on this project.

Sincerely,

A handwritten signature in cursive script that reads "Dora Beck".

Dora Beck, P.E.  
ACTING DIRECTOR

NEIL ABERCROMBIE  
GOVERNOR OF HAWAII



LORETTA J. FUDDY, A.C.S.W., M.P.H.  
DIRECTOR OF HEALTH

STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P. O. BOX 3378  
HONOLULU, HI 96801-3378

In reply, please refer to:  
File:

12-112  
EIS NavyAircraft

June 18, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

Dear Sir:

**SUBJECT: ENVIRONMENTAL IMPACT STATEMENT FOR THE BASING OF MY-22 AND H-1 AIRCRAFT IN SUPPORT OF III MARINE EXPEDITIONARY FORCE ELEMENTS IN HAWAII**

The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your letter, dated **June 5, 2012**. Thank you for allowing us to review and comment on the subject document. The document was routed to the various branches of the Environmental Health Administration. We have no comments at this time, but reserve the right to future comments. We strongly recommend that you review all of the Standard Comments on our website: [www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html](http://www.hawaii.gov/health/environmental/env-planning/landuse/landuse.html). Any comments specifically applicable to this application should be adhered to.

The United States Environmental Protection Agency (EPA) provides a wealth of information on their website including strategies to help protect our natural environment and build sustainable communities at: <http://water.epa.gov/infrastructure/sustain/>. The DOH encourages State and county planning departments, developers, planners, engineers and other interested parties to apply these strategies and environment principles whenever they plan or review new developments or redevelopments projects. We also ask you to share this information with others to increase community awareness on healthy, sustainable community design. If there are any questions about these comments please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura Leialoha Phillips McIntyre".

Laura Leialoha Phillips McIntyre, AICP  
Environmental Planning Office Manager  
Environmental Health Administration  
Department of Health  
919 Ala Moana Blvd., Ste. 312  
Honolulu, Hawaii 96814  
Phone: 586-4337  
Fax: 586-4370  
[laura.mcintyre@doh.hawaii.gov](mailto:laura.mcintyre@doh.hawaii.gov)

## BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843



June 19, 2012

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Manager and Chief Engineer

ELLEN E. HIRAYAMA, P.E.  
Deputy Manager and Chief Engineer

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

Dear Ms Sumida:

Subject: Your Letter Dated June 5, 2012 Requesting Comments on the Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii

Thank you for your letter requesting comments on the basing of MV-22 and H-1 aircraft.

The existing water system is adequate to accommodate the proposed aircraft basing. However, please be advised that this information is based upon current data and, therefore, the Board of Water Supply reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

If you have any questions, please contact Robert Chun at 748-5443.

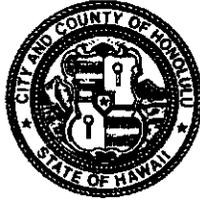
Very truly yours,

SUSAN UYESUGI  
Program Administrator  
Customer Care Division

DEPARTMENT OF FACILITY MAINTENANCE  
**CITY AND COUNTY OF HONOLULU**

1000 Uluohia Street, Suite 215, Kapolei, Hawaii 96707  
Phone: (808) 768-3343 • Fax: (808) 768-3381  
Website: www.honolulu.gov

PETER B. CARLISLE  
MAYOR



WESTLEY K.C. CHUN, Ph.D., P.E., BCEE  
DIRECTOR AND CHIEF ENGINEER

KENNETH A. SHIMIZU  
DEPUTY DIRECTOR

IN REPLY REFER TO:  
DRM 12-518

June 20, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

Dear Gentlemen:

**Subject: Environmental Impact Statement for the Basing of MV-22  
and H-1 Aircraft in Support of III Marine Expeditionary  
Force Elements in Hawaii**

Thank you for the opportunity to review and comment on the subject project.  
We do not have any objections to the proposed project since most of the construction is on  
Federal Property.

Should you have any questions, please call Lan Yoneda of the Division of Road  
Maintenance, at 768-3600.

Sincerely,

A handwritten signature in black ink, appearing to read "Westley K.C. Chun".

Westley K.C. Chun, Ph.D., P.E., BCEE  
Director and Chief Engineer

**Robert A. Gould  
44-365 Kaneohe Bay Drive  
Kaneohe, HI 96744-2664  
June 21, 2012**

**Naval Facilities Engineering Command, Pacific  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive, Suite 100, Pearl Harbor, HI 96860-3134**

**Dear Naval Facilities Engineering Command:**

**Comments on FINAL ENVIRONMENTAL IMPACT STATEMENT FOR BASING OF MV-22 AND H-1 AIRCRAFT IN SUPPORT OF III MARINE EXPEDITIONARY FORCE (MEF) ELEMENTS IN HAWAII**

**Of the 670 pages of Volume 1 of the EIS, only 6 pages are devoted to the major impact issue, which is noise. There is one paragraph in the summary concerning noise, essentially attempting to convince us that there will be no additional impact over what is now the case.**

**The EIS contains 15 pages of tables of contents and lists of tables, which is about 3 times as much space as is devoted to the main impact issue.**

**We are asked to believe that with a 29% increase in operations using aircraft that may or may not be noisier than the existing mix, there will be no additional noise impact.**

**We are told nothing of the sound levels of the individual aircraft nor of the proposed routes of operations of those aircraft, so let's examine some of those issues.**

**P-8: does it meet the same State 3 noise standards that current airliners must meet? Boeing is silent on the subject, but the CFM56-7 engines used on it certainly do in the commercial airplanes, so it should be a quiet airplane.**

**MV-22 Osprey: Again, it is difficult to find real information on the subject, although in the Quantico EIS, it was stated that the Osprey had somewhat lower noise levels in overflights than the CH-46 helicopter, and was comparable to the CH-53s that are now used at MCBH. The problem is that the major noise footprint of the Osprey is in takeoff and transition to level flight. Once in level flight it is supposedly comparable to the CH-53s. Since the MCBH EIS states that the Osprey needs 5,000 ft of runway, it can be assumed that takeoffs will start at the approach end of runway 4 (nearest Kaneohe). Absent any demonstration flights, it is impossible for the public to make either a qualitative or quantitative assessment of the noise impact of the airplane. The good thing about it is that in the preferred Alternative A, the Ospreys will be parked behind the hangars, which should alleviate much of their noise impact, particularly if**

they can be persuaded to start their takeoff runs at midfield at taxiway C or even B, near the hangars. Based on a decidedly unscientific viewing of YouTube videos taken with cameras that have automatic volume controls that attempt to keep all volume levels close to the same, the MV-22 seems to make a good deal of noise taxiing and taking off, but is relatively quiet in forward flight. It takes about 2 minutes to start the engines, and its APU (auxiliary power unit) is quite noisy and runs for a significant amount of time prior to engine start. For this reason, the basing of the MV-22s behind the hangars as in Alternative A is optimum from a noise impact standpoint. The MV-22 has a LOT of downwash. One would not want to be under it in a sailboat when it is on short final!

**AH-1 Cobra and UH-1 Huey helicopters:** These two helicopters, in their present configuration of two rotor blades, are quite obnoxious from a noise standpoint due to the slapping sound made by the rotor blades. As the newer four blade models are phased in, the objectionable noise could arguably decrease, but again, we have no way of knowing when that will be or what the effect of 4 blades vs 2 will be absent a demonstration. Overflights at low altitudes by either helicopter could easily be more objectionable than with the CH-53s or SH-60s, even though the overall noise may be less.

A major component of the noise footprint that seems to be entirely omitted in the EIS is that of overflights and flight routings. The study seems to only concentrate on aircraft in the traffic pattern for landings and takeoffs. For those who live in affected areas under flight routes or along the shoreline of Kaneohe Bay when air/sea rescue training is taking place, the flight routes are supremely important. There is no discussion in the EIS regarding flight routes. While the base has in the past told the public what routes should be used, the published routes in the Hawaii Airports Guide put the lie to that, as they differ significantly, particularly when approaching from the Pali over the Kapaa Quarry. We need to know whether the Ospreys will use that route, and what the impact to other traffic in the relatively narrow and congested Nuuanu Valley would be. It is a much larger aircraft than are either the CH-53 or the SH-60, and that impacts light airplane traffic through that valley and the Kalihi Valley. If the Ospreys are limited to offshore routes, their flight noise impacts should be minimal, but if they approach the base directly from the Kapaa Quarry, there will be many complaints.

It should be noted that the impact of noise, particularly on arrivals, is greatly affected by pilot technique. Since there is a good deal of training done at MCBH, the noise impacts can vary greatly as a result. In any event, the fixed wing noise impacts can be considered to remain relatively low, certainly compared to the previous F-4s, F-8s, and F-18s.

The command structure should commit to a dedicated noise complaint phone number with trained operators who will take and maintain records of noise complaints, and the command structure should guarantee responses by persons in authority when responses are requested. At the present time only lip service is given to responses by the PAO office, and none are ever forthcoming.

The EIS should clearly describe routes of flights of rotor wing aircraft and MV-22s, and demonstration flights should be a requirement of the EIS, along with comparative actual ground level noise measurements.

The command structure should commit to intersection takeoffs of MV-22s using taxiway C primarily and taxiway B only when absolutely necessary.

The command structure should commit to maintenance runs of all aircraft being limited to the areas northeast of the hangars.

We were asked to comment during public hearings, but we need an opportunity to comment on the EIS itself. The comment website has closed down, so the only apparent method to do so now is via USPS mail, which unless we use Certified Mail at significant cost, has no guarantee of delivery.

With these commitments and with demonstration flights, the public can make a realistic assessment of the impacts of the proposed changes. Absent demonstration flights the EIS is totally worthless.

In closing, a recent study found that for every 10dB increase in traffic noise, heart attacks increased 12%. Noise is NOT a minor issue.

Sincerely,



Robert A. Gould  
Retired 747 Captain, NW Airlines  
[bob.gould@stanfordalumni.org](mailto:bob.gould@stanfordalumni.org)  
(808) 254-5242

Ronald A. Darby  
44-401 Kaneohe Bay Drive  
Kaneohe, HI 96744-2664

RECEIVED

June 27, 2012

'12 JUL -2 A10 :44

Naval Facilities Engineering Command, Pacific Area: EV21, MV - 22/H - 1 EIS  
Project Manager 258 Makalapa Drive, Suite 100, Pearl Harbor, HI 96860 - 3134

**Comments on FINAL ENVIRONMENTAL IMPACT STATEMENT FOR BASING  
OF MV- 22 AND H-1 AIRCRAFT IN SUPPORT OF III MARINE  
EXPEDITIONARY FORCE (MEF) ELEMENTS IN HAWAII**

Dear Naval Facilities Engineering Command:

My family and I have lived at the Puu Papaa location "pp" shown in the EIS since 1971 and have thus lived with the aircraft noise from the base. Also I operated an acoustical consulting business for 20 years in Hawaii and have provided noise studies for various civilian and military airports.

My neighbor Robert A. Gould has submitted his EIS comments on 6/21/12. I have reviewed these comments and agree with his thinking. Thus with his permission, I include several main comments from Mr. Gould's letter which I feel should have emphasis and are shown below in quotes.

"Of the 670 pages of Volume 1 of the EIS, only 6 pages are devoted to the major impact issue, which is noise. There is one paragraph in the summary concerning noise, essentially attempting to convince us that there will be no additional impact over what is now the case."

"We are asked to believe that with a 29% increase in operations using aircraft that may or may not be noisier than the existing mix, there will be no additional noise impact."

"We are told nothing of the sound levels of the individual aircraft ....."

For the Osprey, the absence of "...any demonstration flights, it is impossible for the public to make either a qualitative or quantitative assessment of the noise impact of the airplane."

"A major component of the noise footprint that seems to be entirely omitted in the EIS is that of overflights and flight routings. The study seems to only concentrate on aircraft in the traffic pattern for landings and takeoffs".

**“For those who live in affected areas under flight routes or along the shoreline of Kaneohe Bay when air/sea rescue training is taking place, the flight routes are supremely important. There is no discussion in the EIS regarding flight routes.”**

**“... the fixed wing noise impacts can be considered to remain relatively low, certainly compared to the previous F-4s, F- 8s, and F-18s.”**

**“The command structure should commit to a dedicated noise complaint phone number with trained operators who will take and maintain records of noise complaints, and the command structure should guarantee responses by persons in authority when responses are requested.”**

**“The EIS should clearly describe routes of flights of rotor wing aircraft and MV-22s, and demonstration flights should be a requirement of the EIS, along with comparative actual ground level noise measurements.”**

**“With these commitments and with demonstration flights, the public can make a realistic assessment of the impacts of the proposed changes. Absent demonstration flights the EIS is totally worthless.”**

**Additional comments I have are:**

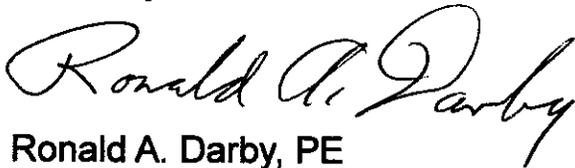
- 1). The DNL noise level of 55dBA shown in the outside noise contour is considered as acceptable based on most noise studies which assume year around closed windows as found in most mainland housing. The EIS should acknowledge that most of the residences affected by the base's aircraft are wide open allowing natural ventilation year around. Consider showing the 45 dBA LDN contour line as the acceptable noise level.**

**Many nights I must jump up and close sliding doors to be able to hear TV programs when helicopters in training flights fly very low over or near my house. What routes are helicopters allowed at night to fly over southern Kaneohe Bay?**

- 2). Some years ago there was agreement that air/rescue practice should be done at a location up near the base. Very often, particularly when there are heavy tradewinds, the event apparently following the drifting safety boat ends up in the evening down in the residential area interrupting dinner conversations or TV and radio listening. Why can't the small boat be anchored so the operation remains near the base.**

- 3). The computer modeling assumes straight line sound propagation. In real life we have thermal inversions and downwind gradients which cause the sound rays to bend downward and sometimes cause intense focusing of sound. Some evenings and mornings maintenance noise can become extremely loud due to sound refraction. The command structure should beware of such phenomena if there are many noise complaints and adjust work schedules to exclude adverse sound refraction periods.
  
- 4). Over the years we often heard responses to noise complaints involving military aircraft as: "It's just the sound of freedom!". Now some people think patriotic also means to respect Eisenhower's warnings of 50 years ago about an overly aggressive military/industrial complex, and upon hearing the constant Touch and Go operations of aircraft like the F-22 and C-17 are reminded of the controversy over the need for more such aircraft.

Sincerely,



Ronald A. Darby, PE

ph: 808-254-3095, email: ronmildarby@gmail.com

45-442 Ohaha Street  
Kane'ohe, Hawai'i 96744  
June 28, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Dr., Ste. 100  
Pearl Harbor, Hawai'i 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

Re: Environmental impact statement

To whom it may concern,

I am writing, once again, about the proposed basing of MV-22 and H-1 aircraft at the Kane'ohe Marine Base in Hawai'i. We have received the most recent CD re: the project and have waded through all of the materials, most of which naturally slants the information toward the Navy's point of view. In addition, the project is frequently referred to in the news (both hard copy articles and television news) with the implication that the decision is irrevocable. As before, our primary concern is the expected increased noise levels (reference our letter of December 25, 2011). The implication of this "final environmental impact statement" (FEIS) is also that the project is a "done deal" and that any incoming comments are simply to meet a requirement. However, even given that, I feel that I must comment on some of the information which was included.

Our primary concern, other than those previously noted, is that much of the propaganda which fills your FEIS is based on very old information. For the most part you have cited obscure and very out-dated studies, and the information which should be included is either glossed over or omitted altogether.

We are opposed to the proposed changes at Marine Corps Base Hawai'i (MCBH) and dispute a number of the assessments noted in the environmental impact statement and the responses to those points. It should be noted that the EIS notes a number of issues that are not in compliance with the National Environmental Policy Act.

My husband and I purchased and have lived in our home in the Pikoiloa subdivision since 1964. We have raised our children here and are just retired with no plans, or even capabilities, to live elsewhere. When we purchased our home noise was not a major issue, and it did not become so until the mid-90s when those aircraft headquartered at Barber's Point were transferred to the Kane'ohe Marine base. We do not recall that those of us on the Windward side had any choice in that decision or, for that matter, were even consulted.

In the past few years the noise levels have increased exponentially and, while there are days when there is little noise from Marine base-related activities, those days are relatively few. We are regularly subjected, among others, to:

- helicopter fly-overs (our home is adjacent to and just below Hawaiian Memorial Park and the helicopters often fly along, and across, H3 -- another addition to Kane'ohe which came into being long after our home was purchased),
- a continual and annoying loud droning hum from the flight-line, sometimes beginning as early as 3:00 AM and/or lasting until very late in the evening,
- jet take offs until 11 or 12 at night,

- daytime circling of a large aircraft which is, presumably, practicing takeoffs and landings – this sometimes continues for many hours and the noise is loud and continuous.
- evening noise levels from the base that are sometimes so loud it's impossible to hear even the television at a normal sound level, never mind normal conversation.

Couple that with other noise, for which the Marine base is not responsible but which must be considered in the total picture, and the situation is often unbearable. Tour helicopters, which fly almost directly over our home, are flying every day of the week, beginning at 8 or 8:30 AM and continuing until dark. They can range in frequency from every 10 to 25 minutes on some days, and can occur as many as 14-20 times a day; private planes are often in the mix, although not as frequently, but will circle endlessly overhead. Other military helicopters (e.g. Coast Guard) often fly over, sometimes late at night, as well as police or fire helicopters. The only "regular" peace we can count on is when the President is here during the Christmas holidays since we are, thankfully, within the "no fly" zone. That, of course, is only once a year for a relatively few days and will only last as long as the current president is in office.

As a nurse I am well aware of many studies over the years that have shown the detrimental effects of noise on the human health (see reference list for a limited number of examples). Noise causes a wide range of health effects, including:

- increased stress levels which affect general health,
- sleep disturbances:
  - the number and duration of awakenings;
  - the number of changes in sleep stage;
  - global changes in total amount of sleep stages or in their time organization
- cardiovascular effects:
  - epidemiological evidence supports the hypothesis that persistent noise stress increases the risk of cardiovascular disorders including hypertension and ischemic heart disease.
- damage to work and school performance:
  - noise has negative impacts on cognitive performance, attention and memory. These adverse impacts of noise on cognitive performance can lead to a reduction in the productivity at work and the learning performance at school.
- hearing impairments, including tinnitus which is a constant, never ending whistle or buzzing in the ear and which is often impacted by noises such as helicopters, airplanes, etc. There is no cure, and patients are told they "just have to learn to live with it."

I am concerned about both cumulative effects of noise and the issue of "annoying" noise. The noise levels that we experience almost daily are beyond what we would define as "annoying".

We feel the EIS does not adequately address human health effects, and there is no discussion of or evaluation of cumulative impacts as is required.

- The FEIS does not address the frequency of exposure to noise which is expected to increase by (according to published reports) anywhere from 28% to 49% which, from our vantage point is hardly "minimal"
- The annoyance from helicopter noise has not been fully substantiated by means of community noise survey research. There have apparently been no actual measurements from sites in the community which will be most impacted.

- The FEIS states that the increases in future aircraft noise levels associated with introduction of the MV22 and AH/UH1 aircraft are "expected to be minimal and would be difficult to measure or discern due to the lower noise levels of the aircraft when compared to other aircraft operating at MCB Hawaii Kaneohe Bay".

In our family of four, one member has suffered for several years from severe insomnia which has been exacerbated by the increased Marine base noise levels, and another family member suffers from tinnitus which is severely exacerbated by overflying helicopters. The suggestion of increased noise levels, no matter how "slight" or "annoying" are extremely anxiety-producing for people with those afflictions.

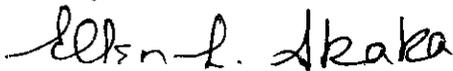
The FEIS did not present adequate data on the effects of noise on wildlife nor potential human health impacts associated with contaminants from aviation fuel and may be consumed in foods from the ocean.

This FEIS should not be approved based on failure to adequately address the effects on the environment, a number of issues which were not addressed, data based on old studies, and some data that was incorrect:

- - There was no comprehensive examination at cumulative impacts
- There was incomplete information on alternative locations
- There were incomplete, and perhaps inaccurate, assessments on the effects on human health.
- There was no mention of changes to quality of life.

We believe that the EIS does not adequately examine all of the issues which should be considered. We would ask that the EPA not approve the FEIS. I would point out that in the several days it has taken to complete this letter, there has been almost continual noise of one type or another from MCBH from jet takeoffs, to flight line noise, to practice landings, etc. at all hours of the day and night. It is beyond annoying to a level of being infuriating. The constancy frays tempers of everyone in the house.

Sincerely,



William H. and Ellen L. Akaka and family

Cc: Senator Daniel Inouye  
Senator Daniel Akaka  
Representative Mazie Hirono  
Representative Colleen Hanabusa  
State Senator Jill Tokuda  
State Representative Ken Ito  
Kaneohe neighborhood board

The following are just a few of the many references that are available related to the above subject:

- C.L.R. Atkins, P. Brooker, and J.B. Critchley, 1983, "1982 Helicopter Disturbance Study: Main Report," London: Civil Aviation Authority, DR Report 8304.
- Babisch, W., H Ising, J E J Gallacher, (2003) "Health status as a potential effect modifier of the relation between noise annoyance and incidence of ischaemic heart disease", *Occup Environ Med* 2003;60:739-745 doi:10.1136/oem.60.10.739
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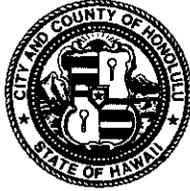
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POLICE DEPARTMENT  
**CITY AND COUNTY OF HONOLULU**

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813  
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulu.org



PETER B. CARLISLE  
MAYOR

LOUIS M. KEALOHA  
CHIEF

DAVE M. KAJIHIRO  
MARIE A. MCCAULEY  
DEPUTY CHIEFS

OUR REFERENCE **WK-LKA**

July 6, 2012

Naval Facilities Engineering  
Command, Pacific  
Department of the Navy  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawaii 96860-3134

Attention: MV-22/H-1 EIS Project Manager (EV21)

To Whom It May Concern:

This is in response to a letter received from Ms. Karen Sumida (dated June 5, 2012) requesting comments on the Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of Third Marine Expeditionary Force Elements in Hawaii.

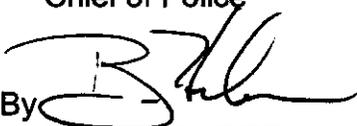
This project should have no significant impact on the facilities or operations of the Honolulu Police Department.

If there are any questions, please call me at 723-3857.

Sincerely,

LOUIS M. KEALOHA  
Chief of Police

By

  
BART S. HUBER  
Assistant Chief  
Support Services Bureau

RECEIVED

'12 JUL -6 AM 00

Karen Ashley  
P.O. Box 1302  
Kauaakakai Hawaii 96748  
(808) 553 8030  
5 July 2012

Department of <sup>NAVFAC Pacific</sup> the Navy  
Navy Facilities Engineering Command, Pacific  
258 Makalapa Drive Suite 100  
Pearl Harbor HI 96860-3134

Dear Project Manager:

Please excuse the delay in responding - I hope you have received this in time. Computer literacy - people off island - that kind of thing.

1) The helicopter they want to use is unstable - my landlord was a test pilot and hates the design - plus it makes so much dust it's unsafe since it can't be landed manually.

2) The locals are worried about the noise and dust. Farmers want to sleep and breathe clean air. It's already very windy there.

Karen Ashley

7/6/12

Naval Facilities Engineering Command, Pacific  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Dr., Suite 100  
Pearl Harbor, HI 96860-3134

Dear Sir or Madam,

I am writing about the final environmental impact statement that the Navy recently released regarding the proposed expansion of air activity and personnel at Kaneohe Bay Marine Base here in Kaneohe, HI. I am a homeowner who has lived right off Kaneohe Bay since 1989. I am not a scientist nor a politician, but a concerned citizen who is compelled to make my voice known about these issues impacting our neighborhood.

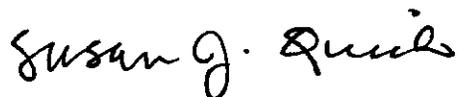
Currently the noise level generated by planes and helicopters from the base affects the quality of life for me and others living here. Many times I have had difficulty hearing guests in my own home when planes are repeatedly landing and taking off across the Bay. Several times helicopters have flown so low that my home shook from the vibration. At night, we can hear planes landing or simply sitting on the runway for hours with engines running, sometimes well after midnight. Even when I use earplugs, I can still hear the noise and it affects my sleep.

If the Marines are allowed to increase the air activity at the base with the Osprey, Cobra, and Huey helicopters, I am worried that the quality of life for all of us living along Kaneohe Bay will suffer. The noise factor alone is amplified by the mountains and hillsides surrounding the Bay. The EIS indicated that there is a low population density in the area, but that is only true if they count the square miles of ocean and mountain ranges that are protected from development. The surrounding shoreline and hillsides are densely populated as people live in every square foot of land that is allowed to be developed. We are not out in the country, but live in small towns with schools, churches, and everyday businesses.

The Marines have not proved to be good neighbors to the community when they let the plane and helicopter engines run past midnight on the runway or fly across neighborhoods before 7am. We have no recourse when we are disrespected this way and want to sleep. The base has gotten much noisier in the past few years and it appears that it is getting ready to increase the noise factor again.

Please consider us, the ordinary people who live along the Kaneohe Bay because we love the natural beauty and serenity of this place. It is sad that the military chooses the most peaceful settings to practice in. After all what are we training or fighting for? Some say freedom, but what does freedom mean beyond the absence of war? To me, freedom means having the opportunity to live here in Kaneohe, having mutual respect for all of neighbors.

Susan J. Quick  
44-117 Puuohalai Pl., Kaneohe, HI 96744



Carol Hinton  
HC 01 Box 142  
Kaunakakai, HI 96748-8603

July 9, 2012

RE: eis Molokai

Dear Project Manager -

As a resident of Molokai I say to you that the impact of having 50 +/- military aircraft coming and going on this small island would be devastating to the culture here, plus be a negative influence on our current visitor economy.

We still have unexploded ordnance on island from the last time war was being rehearsed here. Please do what you can to deter this project.

Thank you.

CHinton

ALAN M. ARAKAWA  
Mayor



**DEPARTMENT OF PARKS & RECREATION**  
700 Hali'a Nakoa Street, Unit 2, Wailuku, Hawaii 96793

GLENN T. CORREA  
Director

PATRICK T. MATSUI  
Deputy Director

(808) 270-7230  
FAX (808) 270-7934

July 9, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

Dear Project Manager:

**SUBJECT: Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii.**

Thank you for the opportunity to review and comment on the Final Environmental Impact Statement for the subject project. The Department of Parks & Recreation has reviewed the above and has no comments at this time.

Please feel free to contact me or Robert Halvorson, Chief of Planning and Development, at 270-7931, should you have any questions.

Sincerely,

GLENN T. CORREA  
Director of Parks & Recreation

c: Robert Halvorson, Chief of Planning and Development

GTC:RH:as

Kalaupapa National Historical Park Advisory Commission  
C/o Reverend David Kaupu  
2131 Puna Street  
Honolulu, HI 96817

July 9, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

**Subject: Comments on the Final Environmental Impact Statement for Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii**

Aloha.

I am David Kaupu, Chairperson of the Kalaupapa Federal Advisory Commission, and this is a comment letter in response to the subject of "MCBH increase air ops at Kalaupapa."

At our duly called (and federally registered) meeting, held on June 14, 2012, at Kalaupapa, the Commission took the following action with air operations at Kalaupapa: That the commission and the park does not support any increase in flight operations whatsoever.

Our rationale for this position is that Kalaupapa is a sacred place and any increase of flight operations would be an adverse effect to the feeling, association, and setting of KALA NHP.

Further, the silence and natural sounds of the landscape (wind, ocean, etc.) contribute to the setting and any disturbance would be adverse. The draft EIS proposes that flight training would occur between 7-11 pm at night. The night sky is important to the ambiance of people and place to keep the silence/natural night sounds and also to see the night sky. Increased flights could potentially interfere with cultural practices and future classes in astronomy, night sky, etc.

Lastly we did say that we support the "no action" alternative and what this means is that the Commission is willing to allow the current level of helicopter flights coming in, but no increase above the current level.

Mahalo for your kind attention to this comment letter.

Me Kealoha,

*P.P. Leslie Lanua Naiele*  
David Kaupu, Chair  
Kalaupapa NHP Advisory Commission

cc: Ken Salazar, Secretary of the Interior

July 9, 2012

TO: Naval Facilities Engineering Command Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attention: EV 21 MV-22/H-1  
EIS Project Manager

RE: INACCURATE, MISLEADING FEIS FOR BASING OF MV-22 AND H-1 AIRCRAFT  
AT KANEOHE MARINE CORPS BASE

Say it isn't so! Again the Environmental Impact Study uses an old, outdated map that indicates the "proposed action" will occur over our "low density" unoccupied area, when that is Not True. This is a "High Density" area indeed!

It seems that this survey company had borrowed a map from the recent P-8A-EIS which ignored that thousands of people live in homes that extend right up to the shoreline of Kaneohe Bay. (This area is shown as vacant and ~~that~~ <sup>that</sup> ~~is~~ <sup>is</sup> therefore, a, MV-22 failure/crash would not endanger civilians. This is incorrect, misleading and endangers many people.)

This area has changed a lot in recent years. It is important that folks involved in planning and survey work visit the site, not rely on outdated material. It would be wise to drive to Heeia Point and walk out to the bay and then look toward the right at the huge sound basin and the thousands of homes crowded into the hillside, observe how densely it is populated.

Then drive down Kamehameha Highway, pass King Intermediate to (the first) Lilipuna. (Where Haiku Road becomes Lilipuna at the edge of the Mall and beginning at Central Pacific Bank.) Drive down Lilipuna, noting the condos (540!) on your right that become homes. When you come to a street on the left drive down that inlet and see how the homes hug the shoreline. That border of homes continues all around the bend and almost to the Marine Base at the ending of the shopping center (Aikahi Shopping Center).

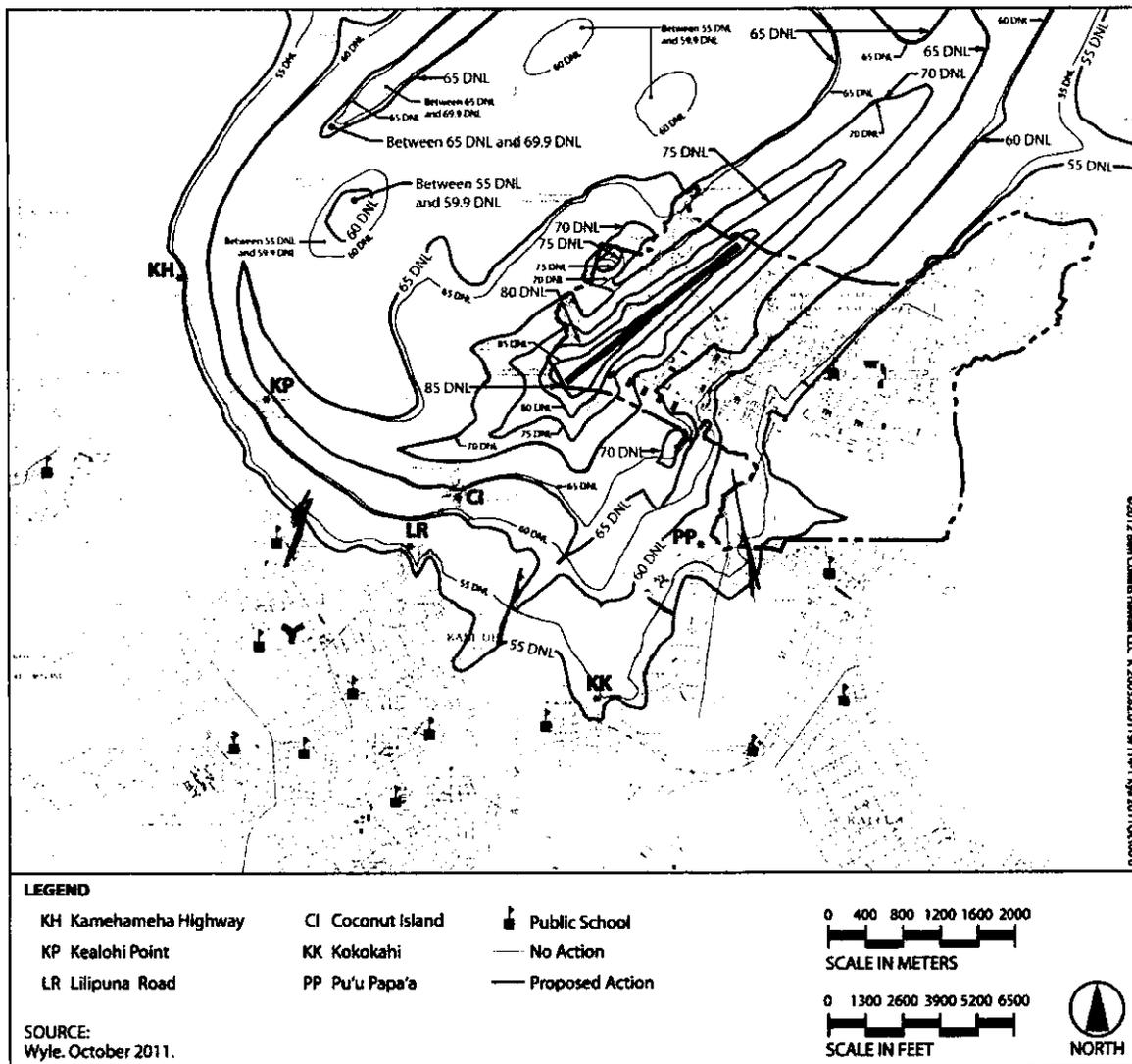
As homeowners increasingly gather out of concern about what the military proposes, the question consistently comes up: When there are bases on the mainland that have huge expanses of land around them in which to (practice and) ~~and~~ train newer pilots, why are you selecting the tiny, densely populated infrastructurally challenged Hawaiian islands with their crowded multi-used bases...and even to train new pilots on new equipment?

Certainly your young pilots who are told to fly (often accident-prone) equipment would be safer flying over large open spaces rather than the postage stamp areas here. And we would be safer too.. (For example, please see enclosed.)

Thank you for inviting our response. I write out of deep concern and hope you will think about and investigate my "ringside seat" concerns.

Polly Pool  
46-082 Puulena St. #1213  
Kaneohe, Hawaii 96744

Encl: FEIS Map  
Former Chief Analyst Safety Issues

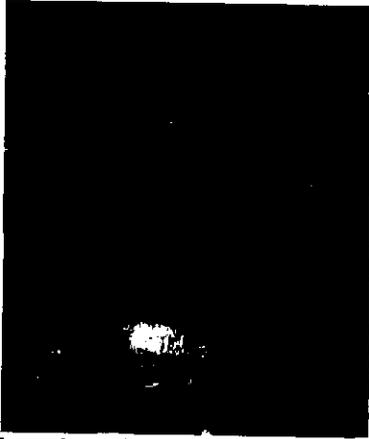


1  
2 **Figure 3-4. Aircraft DNL Contours at MCB Hawaii Kaneohe Bay for 2018 Proposed Action and No Action Alternative**

3 1 The Hawaii Institute of Marine Biology is located on Coconut Island.

4 Figure 3-5 shows the SEL and Lmax of the primary aircraft modeled at MCB Hawaii Kaneohe  
 5 Bay as they pass by the vicinity of KP. KP was chosen because it is the POI closest to the  
 6 modeled flight tracks and would have the greatest DNL of the six POIs. Of the aircraft shown  
 7 in Figure 3-5, the (transient) fighter/attack aircraft (represented by the F/A-18) and the large

## **Former chief analyst states that the MV-22 has a very serious issue in terms of safety**



In an interview with the Ryukyu Shimpo, in Virginia, former chief analyst Arthur Rex Rivolo pointed out that the V-22 Osprey aircraft will crash if its engines stop working.

May 28, 2012 Hideki Matsudo of Ryukyu Shimpo reports from Washington D.C.

On May 27, former chief analyst Arthur Rex Rivolo, who testified before the House of Representatives in June 2009 on the inability of the MV-22 Osprey vertical take-off and landing transport aircraft to safely autorotate, responded to a request from the Ryukyu Shimpo for an interview. With regard to the planned deployment to U.S. Marine Corps Air Station Futenma, the former chief analyst said, "In a combat operation it is very dangerous. However, the chances of an engine failing in peacetime are very rare. In peacetime, the Osprey, I think, is very safe." However, he said, "If the engines stop in the MV-22 over a city, that will be a problem, it will crash . . . uncontrolled crash wherever it happens to be." Rivolo added, "The airplane won't do an autorotation, so basically it's a very serious hole in the safety of the airplane."

Autorotation is the state of flight in which the main rotor system of a helicopter is turned by the action of air moving up through the rotor rather than engine power driving it. A helicopter can be landed safely in the event of complete engine failure. Rivolo pointed out that for the Osprey, "The simulator training does not do the autorotation correctly." He stated, "The MV-22 would fail to meet basic air worthiness directives of the FAA if it were a civilian transport. Although the airworthiness requirements of the FAA do not apply to military aircraft, equivalent requirements have been imposed on all passenger-carrying military aircraft in the past. The MV-22 represents the first departure from this policy within the Defense Department."



MV-22 Osprey vertical take-off and landing transport aircraft

With regard to its deployment to Futenma Air Station, he commented that an accident is unlikely because the pilot will not be required to undertake high-level maneuvering as long as the aircraft is being operated from an airfield because it is not necessary to avoid a possible enemy attack in the combat zone, and also that the airplanes will be very well serviced on a base, which is different from in a battlefield situation or on a warship. At the same time, he touched upon the chances of an engine failing in flight, saying, "We have the possibility of an airplane crash because of bad fuel that's got water or contaminants, so it stops the engines. The two engines are tied together with a drive shaft. That drive shaft is made out of composite. If there is a fire in there, the airplane will crash." He stated that every five years or so they have a helicopter crash caused because of bad fuel. The U.S. Marines stated that it would be almost impossible for the MV-22 engines to stop. Rivolo commented, "It will crash . . . uncontrolled crash if its engines stop working when it's in helicopter-mode." He said that some young people will be killed in combat operations in these crashes. The former chief analyst confirmed previous statements in the House in his interview with the Ryukyu Shimpo, saying, "It is a disregard for soldiers' lives. Yes, and I still believe it."

(English translation by T&CT, Mark Ealey)



## Hawaiian Electric Company

Engineering Department  
PO Box 2750 • Honolulu, HI 96840

July 10, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawaii 96860-3134

Attn: MV-22/H-1 EIS Project Manager (EV21)

Subject: **Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of Third Marine Expeditionary Force Elements in Hawaii.**

Thank you for the opportunity to comment on the subject project. Hawaiian Electric Company (HECO) has no objections to the project. Should HECO have existing easements and facilities where the subject Expeditionary Force Elements plan to be based, we will need continued access for maintenance of our facilities.

We appreciate your efforts to keep us apprised of the subject project in the planning process. As the basing of MV-22 and H-1 Aircraft project comes to fruition, please continue to keep us informed. Further along in the project, we will be better able to evaluate the effects on our system facilities.

If you have any questions, please call me at 543-7245.

Sincerely,

A handwritten signature in black ink, appearing to read "Rouen Q. W. Liu".

Rouen Q. W. Liu  
Permits Engineer

Attachment: Department of the Navy Letter dated 6-5-12

---

**From:** pete doktor [dok@riseup.net]  
**Sent:** Tuesday, July 10, 2012 10:38 PM  
**To:** mv22h1eis  
**Subject:** Public Comment MV-22/H1 EIS  
**Attachments:** osprey statement.doc

Name: Pete Doktor

Company/Organization: State of Hawai`i; Hawai`i Okinawa Alliance; Veterans for Peace, Ch. 113

Mailing Address: 2168A Maha Place

City: Honolulu

State: Hawai`i

Zip Code: 96819

Add to Mailing List? No

Comments: comment attached; please indicate having been received & recorded. comment also follows, just in case:

2168A Maha Place

Honolulu Hawai`i 96819

July 9, 2012

Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: EV21, MV-22/H-1 EIS Project Manager

Ref: EIS Comments for Basing MV-22 & H-1 in Hawai`i

For the record:

I, Pete Doktor, former US Army soldier and Hawai`i resident, am adamantly opposed to the increased militarization of Hawai`i, in general for the following reasons realized after many years of experience and research:

- 1) track record: I recall many accidents by the Osprey, especially having lived in Okinawa and witnessed the many problems foreign military occupation brings, not to mention endangering the soldiers, as well as civilian lives;
- 2) security: the concentration of militarism in Hawai`i and elsewhere actually decreases civilian safety on many levels. Consider the Imperial Japanese invaded "Pearl Harbor" (Pu`uloa is actual name) as a military target, not because of pineapples or palm trees. Advanced military technology increases chances of "collateral damage," thereby decreasing citizen safety by increasing the chances of retribution and retaliation (blowback);
- 3) murder: ultimately, those planes were designed to kill people, often innocent civilians. The unintended consequences of such military hardware, especially under reckless political administration, are not worth the expansion of more military- in Hawai`i, or elsewhere;

- 4) military concentration reeks of environmental racism and classism: almost 25% of O`ahu is occupied by US military; where else do you see this concentration of US military? Okinawa. Guam. In other words, the reason why the military won't occupy places like Martha's Vineyard or Catalina Island, is because they don't really care about people outside of the USA, but are there for political and economic reasons. Its not just geography and logistics- its also about the military legacy of imposing its will upon others;
- 5) imperialism: US military hardware like the MV-22 & H-1 are tools for global domination by design; if it was really about helping and protecting people, we'd be investing in people directly, e.g., health care, education, etc. Whenever military planes interrupt the classrooms I now teach, I can only think of all the resources we DON'T have for our children, that could have easily been had if we had prioritized our youth over military contracts.

I realize this is not a conventional EIS statement based on utilizing facts and minimizing opinion; however, my experience with the military shows me that reason and even-handedness do not guide its policies, but rather politics and economics do. I understand I could have all the most rational true facts, statistics, evidence, etc. to create a powerful critical EIS comment, but politics and the military do not operate under the reason or logic, but rather, power, as exemplified by the chain-of-command. I understand that the Defense and governmental agencies involved will spite democracy, and do whatever is in its political and economic interests (along with a cultural arrogance to justify it) regardless what how the citizens feel- history and current events show us that. So, rather than focus on "facts," this EIS comment focuses on the truth from the historical experiences of Hawai`i, that the US military and governments work to deny, ignore or suppress. This is not an "anti-military" EIS comment per se, but rather, an anti-militarism appeal, founded on not just the lives threatened by military occupations, but also the lives and safety of the soldiers who exploited by the military-industrial-congressional-media complex, and used for the political and economic power of a few.

We have had quite enough of this in Hawai`i. If you feel military preparation brings peace and safety, then you really need to search your conscience (if you still have one) to explain why wars continue, rather than cease with such increasing expansion. In the interest of local security, safety and general well-being, more military expansion, especially the Osprey, is not welcome, and should concentrate on diminishing and focusing on methods that actually do increase safety, security and peace- the opposites of war.

E Malama Pono- Do What Is Right,

Pete Doktor

Honolulu

2168A Maha Place  
Honolulu Hawai'i 96819  
July 9, 2012

Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: EV21, MV-22/H-1 EIS Project Manager

Ref: EIS Comments for Basing MV-22 & H-1 in Hawai'i

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- 4) military concentration reeks of environmental racism and classism: almost 25% of O'ahu is occupied by US military; where else do you see this concentration of US military? Okinawa. Guam. In other words, the reason why the military won't occupy places like Martha's Vineyard or Catalina Island, is because they don't really care about people outside of the USA, but are there for political and economic reasons. Its not just geography and logistics- its also about the military legacy of imposing its will upon others;
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spite democracy, and do whatever is in its political and economic interests (along with a cultural arrogance to justify it) regardless what how the citizens feel- history and current events show us that. So, rather than focus on "facts," this EIS comment focuses on the truth from the historical experiences of Hawai`i, that the US military and governments work to deny, ignore or suppress. This is not an "anti-military" EIS comment per se, but rather, an anti-militarism appeal, founded on not just the lives threatened by military occupations, but also the lives and safety of the soldiers who exploited by the military-industrial-congressional-media complex, and used for the political and economic power of a few.

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E Malama Pono- Do What Is Right,

Pete Doktor  
Honolulu

---

**From:** Rep. Cynthia Thielen [repthielen@capitol.hawaii.gov]  
**Sent:** Tuesday, July 10, 2012 6:25 PM  
**To:** mv22h1eis  
**Cc:** 'Kelly.thomasp@epa.gov'  
**Subject:** State Representative Cynthia Thielen's comments on FINAL EIS for the Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii



## HOUSE OF REPRESENTATIVES

STATE OF HAWAII  
STATE CAPITOL  
415 SOUTH BERETANIA STREET  
HONOLULU, HAWAII 96813

July 10, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
[mv22h1eis@beltcollins.com](mailto:mv22h1eis@beltcollins.com)

### **EVALUATION OF THE DEPARTMENT OF THE NAVY'S FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS) FOR THE BASING OF MV-22 AND H-1 AIRCRAFT IN SUPPORT OF III MEF ELEMENTS IN HAWAII**

Submitted by  
Hawaii State Representative Cynthia Thielen  
House District 50 (Kailua, Kaneohe Bay)

Dear Project Manager:

I represent House District 50, which includes the area where Marine Corps Base Hawai'i-Kaneohe Bay (MCBH) is located. I respectfully submit the following comments on the Final Environmental Impact Statement (FEIS).

My comments on the FEIS cover these areas:

1. Whether the FEIS adequately addresses aircraft noise impact on Aikahi Elementary School.
2. Whether the FEIS adequately addresses aircraft noise impact on the communities of Aikahi Park, Kaimalino, and those along Kaneohe Bay Drive.

3. Whether the FEIS reflects a good-faith effort to adequately address the Environmental Protection Agency's (EPA) recommendation that the FEIS include certain additional information in its discussion regarding aircraft noise impact on schools and residences. In its letter dated January 3, 2012 to the Naval Facilities Engineering Command (NAVFAC), Pacific Division, the EPA recommended (among other things) that the FEIS:
  - a. Make a valid comparison of school noise level with the school noise criteria of Table C-2 in Appendix D, by adopting the Federal Aviation Administration (FAA) calculation for noise during a school day (e.g., 8:00 a.m. to 3:00 p.m. on weekdays); and
  - b. Calculate awakenings [sleep disturbances] for the baseline, no action alternative, and action alternatives, and summarize the results in the body of the document.
4. Whether the FEIS adequately addresses the project's impact on the availability and cost of local rental housing.

NOTE: My concerns are summarized at the beginning of each section. Relevant portions of the FEIS are quoted in italics or block paragraph form. References to the FEIS are cited by the FEIS page number, as well as the electronic Portable Document Format (PDF) page number.

1. **The FEIS does not adequately address aircraft noise impact on Aikahi Elementary School, and its conclusions as to noise impact cannot be taken at face value.**

**Comment:** The FEIS does not discuss aircraft noise impact that is specific to Aikahi Elementary School. This school is adjacent to MCBH and any effects of aircraft noise on student learning and instructional quality should be discussed in the FEIS.

It is disappointing that the FEIS makes no specific mention of Aikahi Elementary School. All nearby public schools are lumped together in a brief, general discussion. The FEIS arrives at the general conclusion that public schools will not be affected, because according to the noise impact study, the additional noise is still within acceptable limits for schools: *"public schools would remain outside the 55 dB DNL contour"* (3-22, PDF p. 183).

Aikahi Elementary School serves children from the MCBH and non-MCBH population. Even though parents and teachers of these students understand that protecting our freedom comes at a cost – and that personal and community sacrifices need to be made – expediency in proceeding with this project does not justify ignoring its possible adverse effects on student learning and achievement. One of my constituents is very concerned about the fate of her autistic child. She notes that Aikahi Elementary School has quite a few students with autism and other learning disabilities. Her specific concern is that autistic children typically cannot tolerate loud noises. Thus, loud aircraft would severely disrupt their entire learning experience. It is unacceptable that the FEIS fails to address such significant issues.

**Comment:** The FEIS discussion of noise impact on schools and the larger community is misleading because noise levels are expressed in terms of day-to-night sound level, averaged over a 24-hour period (DNL). As a result, brief, yet painfully loud aircraft flights can "hide" in the overall DNL measurement. Therefore, the FEIS' use of DNL references makes it difficult to meaningfully assess the real-life impact of additional noise on nearby schools and communities.

The problem is that DNL is not an indication of any single specific noise event, such as the sound intensity of a Cobra helicopter flying over Aikahi Elementary School. Rather, DNL only expresses the cumulative noise level of activity in a given area, averaged over a 24-hour period, with nighttime activity assigned a 10 DB "penalty" to account for humans' increased sensitivity to noise at night. Because it is a cumulative measurement of total sound energy averaged over a period of time, the DNL does not tell us what the maximum noise impact of any single event would be. 3-28 to 3-29, PDF pp. 178-179.

**Comment: The FEIS conclusion that the project will only increase noise by 1 dB DNL for most areas around MCBH is not a true indication of the increased noise burden that community residents will bear, and is therefore misleading.**

The Navy considers increases in aircraft noise levels of less than 1 dB DNL insignificant because "*[c]hanges of 3 dB and less are generally not detected by the human ear.*" A-5 at p. 11, PDF p. 311. Additionally, the FEIS asserts that additional noise generated by the extra aircraft (generally, an increase of +1 dB DNL) is acceptable because the total noise level would still be within acceptable limits for residential purposes:

"The results of the computer noise modeling as determined in dB DNL are compared to DoD thresholds for land use compatibility...65 dB DNL and below is considered compatible with residential land uses." A-5 at p. 10, PDF p. 310.

As such, the FEIS conclusion that the project will only increase noise by 1 dB DNL for most communities around MCBH is not a true indication of the increased noise burden that area residents must bear. As the Navy admits, noise at a particular moment could be softer or louder than the stated DNL measurement: "*[b]ecause the DNL is an average, single event aircraft noises in dB can be both less than and greater than the dB reported as DNL.*" Appendix A-5 at p. 10, PDF p. 310. Thus, the sound of any one event – such as a helicopter flying over a school in the 55 dB DNL contour, or flying at night over a person's home in the 65 dB DNL contour – would register at a higher dB level, more than just a +1 impact on the actual decibel level. For this reason alone, the FEIS conclusions as to noise impact cannot be taken at face value.

**Comment: There are additional reasons why the noise impact predictions can be characterized as not useful, misleading, or even deceptive.**

Essentially, the Navy chose to use theoretical, computer-generated models to determine potential aircraft noise impact on MCBH and surrounding communities. While the noise modeling study established a 2009 baseline for MCBH aircraft operations at that time, the baseline was not created with data recorded "in the field" – that is, measurements of actual noise generated by the various types of aircraft currently in use at MCBH. Instead, a theoretical baseline was established by inputting the known sound levels of aircraft obtained from a database, while taking into account the local geography and topography. Similarly, the projected noise level of the proposed new aircraft was calculated by layering more theoretical sound levels on top of the already-theoretical 2009 "baseline". The FEIS explains its methodology for the noise study and concludes that forecasted changes due to additional aircraft noise would be "very small".

"Modeling for aircraft noise at MCB Hawaii Kaneohe Bay involved inputting data [from a general database] on all of the types of aircraft currently using the airfield and expected to use the airfield in 2018 under the action and No Action alternatives, including flight tracks and altitude profiles, type and frequency of operations, time of day, and other data. Resulting noise contours represent cumulative noise levels. The following aircraft types were included in the modeling: addition of MV-22 and H-1 aircraft operations; continuation of CH-53 and SH-60 aircraft operations; replacement of P-3C with P-

8A aircraft; continuation of C-17, C-5A, and AN-124 aircraft operations; and addition of KC-130 operations. The noise analysis disclosed that fixed wing aircraft would continue to be the dominant contributors (approximately 90 percent) to the DNL noise contours at the base and its environs. Forecasted changes in aircraft noise levels attributed to the MV-22 and H-1 aircraft at six noise sensitive areas would be very small (see Section 5.3.1)." 5-24, PDF p. 530.

**2. Similarly, the FEIS does not adequately address aircraft noise impact on specific residential communities within District 50 (such as Aikahi Park, Kaimalino, and others along Kaneohe Bay Drive) and again, its conclusions as to noise impact cannot be taken at face value.**

**Comment:** Just as the FEIS contains only a broad, general discussion of the impact of additional aircraft noise on area schools, there is no discussion of specific noise impact on any one residential community, particularly those nearest to MCBH.

Again, the FEIS ignores the fact that some communities will suffer more from additional noise than others, due to their proximity to MCBH operations. Rather than take the time to discuss specific residential communities that will feel the most impact, the FEIS chooses to characterize the project's noise impact on surrounding communities as an overall 1dB DNL increase. As discussed above, DNL gives us only a general idea as to the cumulative noise level averaged over a 24-hour period, and the noise study used only theoretical data, not actual noise measurements taken from aircraft flying over these particular communities. As a result, the FEIS fails to provide citizens, especially those living closest to the flight patterns, with the critical information that they want the most: how loud will aircraft noise be in their specific neighborhood; what is the loudest aircraft sound that they can expect to hear, and what times of day will this be? How will their daily activities, including sleep, be affected?

Similarly, section 3.2.3 on land use compatibility and the noise environment offers only a generalized discussion, with no specific information relevant to the most affected communities:

"There is a potential for certain nearby land uses to be affected by aircraft noise. However, as discussed in Section 3.5, noise contours representing the proposed action would remain similar in size when compared to contours for the No Action Alternative. Existing noise sensitive land uses in the surrounding civilian community currently exposed to aircraft noise levels greater than 65 dB DNL would continue to be exposed to similar noise levels. DoD's acceptability threshold for noise sensitive land uses would not be exceeded in the surrounding civilian communities (see Section 3.5). The increases in future aircraft noise levels associated with introduction of the MV-22 and AH/UH-1 aircraft are expected to be minimal and would be difficult to measure or discern due to the lower noise levels of these aircraft when compared to other aircraft operating at MCB Hawaii Kaneohe Bay. No mitigation is required for any of the alternatives." 3-7, PDF p. 157.

**Comment:** Surprisingly, the FEIS asserts that despite the operation of additional aircraft – said to constitute 28 percent of future flight operations – there will be no significant impact on noise levels for most of the communities around MCBH.

The project would add several aircraft squadrons to MCBH, which would consist of 24 MV-22 Osprey tiltrotor aircraft, 15 AH-1 Cobra helicopters, and 12 UH-1 Huey helicopters. These additional aircraft are expected to constitute about 28 percent of total future flight operations. One would expect that this

sizeable addition to current aircraft operations would be felt and sensed by area residents on a daily basis. However, according to the FEIS:

"DNL contours would remain similar in size and shape to the No Action Alternative contours, with increases in aircraft noise levels of less than 1 dB DNL. The only off-base landfalls of the 65 dB DNL contour are the northern portion of Coconut Island in the middle of Kaneohe Bay and the tip of Kealohi Point (KP). As shown, public schools would remain outside the 55 dB DNL contour. Fixed-wing aircraft [as opposed to the new proposed aircraft] would continue to be the dominant contributor to the overall aircraft noise environment." 3-33, PDF p. 183.

**Comment: As discussed in the previous comments, the FEIS conclusion that the new aircraft will not pose any significant noise impact to residential areas cannot be taken at face value.**

The FEIS discusses noise impact in terms of DNL, an average measurement of noise over a 24-hour period. The actual decibel level of any one event – such as a helicopter flying at night over a person's home located in the 65 dB DNL contour – could be much higher than the overall 65 dB average, and the actual impact would conceivably be felt as much more than just a +1 increase.

**Comment: Noise, particularly aircraft noise from existing and future MCBH operations, has been the number one citizen concern; the Navy needs to take this issue more seriously.**

Over and over again, in the community assessment interviews and scoping documents, there were complaints that noise from MCBH aircraft disrupts the teaching and learning process in schools, causes residences and workplaces to shake, makes indoor conversations impossible at times, and rouses people from their sleep.

Understandably, the community is concerned about the cumulative effect of years of noise exposure, and the overall reduction in their well-being and quality of life. For example, residents (not just near MCBH but on the Big Island as well) feel they are living in a "war zone". Of the citizen responses to the DEIS, one of the most compelling was from a Korean War Veteran who believes in strong national defense and supports the cause, but says he is "*beginning to wonder how much more strain for freedom [he] can stand*"; for years, he and his wife "*endured the noise of jets at the nearby Marine Base*" and "*the blasts that shook [their] windows, interrupted conversations and sleep, blasts that suddenly frightened [them] and visiting friends etc.*" A-5 at p. 44, PDF p. 146.

**Comment: Unfortunately, when citizens try to obtain information from the Navy about noise from aircraft, they get no satisfactory response, are given "the runaround", or are ignored completely.**

For example, one person stated that at a neighborhood board meeting:

"MCBH personnel would not provide details on the decibel level of jets. No straight answer was given. People were frustrated over lack of details...MCBH representative asked questions that the community could not answer, such as 'Are you sure that aircraft is ours?'" A-3 at p. 2, PDF p. 14.

Moreover, people seemed frustrated that there was no apparent effort by the Navy to translate decibel measurements into real-life terms that the average person could understand. Multiple residents asked that the noise impacts be compared in relation to everyday sounds such as vacuum cleaners, lawn mowers, leaf blowers, etc. For example, how loud is an MV-22 Osprey compared to a vacuum cleaner? Is it the equivalent of noise from 100 vacuum cleaners? 1,000 vacuum cleaners? More? A-3 at p. 5, PDF p. 17; A-4 at p. 7, PDF p. 25.

**Comment:** Given this context, it is especially disappointing that the FEIS approached the issue using only computer generated noise modeling, without accounting for specific concerns in the affected communities.

Expressing noise impacts in terms of DNL is of limited value when the supposedly acceptable 60 dB or 65 dB DNL baseline noise levels are not acceptable to the community in a subjective sense. For example, even without the additional aircraft squadrons, residents are already concerned about the detrimental effect of "[f]ighter jets flying over King Intermediate School during school hours", as the noise "makes it difficult for teachers teaching in the classroom." A-3 at p. 2, PDF p. 14.

**Comment:** The Navy needs to show more aloha for the impacted communities by treating their concerns with the utmost care and respect. The FEIS' superficial treatment of noise impact on daily life in the affected communities is problematic and does not promote good relations with MCBH's host community.

The FEIS' lack of specificity and apparent avoidance of very "hot-button issue" has likely generated anger, resentment, and suspicion among the community. While the appendices to the FEIS relating to the noise studies contain voluminous information on noise thresholds affecting student learning and sleep, this information appears to have been included for the sake of inclusion – i.e. to make the FEIS seem more official, authoritative, and to take up more space. The body of the FEIS and the appendices contain no meaningful discussion of the specific impact of the proposed aircraft flying over our local schools. Rather, the entire issue is glossed over, with a simple conclusion that "*public schools would remain outside the 55 dB DNL contour.*" As a result, there is no support for the FEIS' implicit assumptions that: (1) existing baseline noise levels have not affected student learning in the Kailua and Kaneohe schools; and (2) additional noise from the proposed aircraft squadrons will not have any long-term effect on students in these areas. Moreover, the analysis of cumulative impacts in section 5.3 does not address effects on schools or student learning.

The inadequacy of the FEIS in addressing noise impact on schools, as well as residential communities at night, is further addressed in the next section.

**3. The FEIS does not reflect a good-faith effort to adequately address the Environmental Protection Agency's (EPA) recommendation that the FEIS include certain additional information in its discussion regarding aircraft noise impact on schools and residences.**

- a. The FEIS fails to make a valid comparison of school noise levels with the school noise criteria of Table C-2 (Appendix D) by declining to adopting the Federal Aviation Administration (FAA) calculation for noise during a school day (e.g., 8:00 a.m. to 3:00 p.m. on weekdays).**

**Comment:** The FEIS ignores the EPA's recommendation to include a pertinent analysis of the project's noise impact on schools during school hours. This is unacceptable. Potential disruption of classroom activities due to additional aviation activity is a most significant concern.

In its January 3, 2012 letter to the NAVFAC Pacific Division, the EPA explained:

"We are pleased to see the discussion of noise effects on children's learning and sleep disturbance, discussed in Appendix D (0.3.7.1), but these discussion[s] were not summarized in the DEIS.

Appendix D includes a range of classroom noise criteria (0-3/119 and 120). It questions the legitimacy of the criteria to address aircraft noise impacts without acknowledging the impact of aircraft noise on learning. The Federal Interagency Committee on Aviation Noise states, 'Recent research, which confirms conclusions from the 1970s, shows learning decreases in reading when outdoor noise...is 65 dB or higher (Stansfeld, 2000).' In light of Executive Order 13045, Protection of Children from Environmental Risks and Health Risks, **we support specific analysis of noise impacts to schools.**" (Emphasis added.)

Thus, the EPA made the following recommendation as to the FEIS' discussion of project impact on school noise levels:

"To make a valid comparison of school noise level with the school noise criteria of Table C2 (in Appendix D), the FEIS should adopt the Federal Aviation Administration calculation for noise during a school day (e.g. 8:00 a.m. to 3:00 p.m. on weekdays).

In the FEIS section on Responses to Draft EIS Comments, the Navy appears to sidestep the issue with the following response, which claims that no further analysis of schools is needed:

"While DoD [the Department of Defense] has not yet established significance criteria for noise impacts to schools for use in NEPA studies, MCO 11010.16 suggests the compatibility of educational land use for bands of outdoor Day-Night Average Sound Levels (DNL). DoD guidelines for identifying the potential for (negative) classroom learning effects suggest a school-day Equivalent Sound Level (Leq) of 60 dB as a first-order screening, which for aircraft operations at MCB Hawaii Kaneohe Bay corresponds to a 24-hour DNL of between 55 and 60 dB. As all schools are/would be exposed to DNL less than 55 dB, MCO 11010.16 suggests these schools (including the Hawaii Institute of Marine Biology on Coconut Island exposed to DNL between 60 and 62 dB) are/would be compatible with existing and proposed aircraft noise, and DoD guidelines would not recommend further analysis of these schools." A-5 at p. 24, PDF p. 324.

**b. The FEIS fails to calculate awakenings for the baseline, no action alternative, and action alternatives, and summarize the results in the body of the FEIS.**

**Comment: As with school day noise impact, the FEIS ignores the EPA's recommendation to address the project's impact on the ability of area residents to get a good night's sleep. The FEIS fails to calculate the effect of additional flights on the rate of awakenings (i.e. disruptions to sleep). This, too, is unacceptable. Proper sleep is very important to peoples' health and well-being.**

In its January 3, 2012 letter to the NAVFAC Pacific Division, the EPA stated:

"We also note that Appendix D of the DEIS states that the Federal Interagency Committee on Aircraft Noise supports the use of ANSI S12.9-2008 to predict awakenings, but stops short of calculating awakenings."

Thus, the EPA made the following recommendation as to the FEIS' discussion of project impact on residential noise levels and sleep:

"The FEIS should calculate awakenings for the baseline, no action alternative and action alternatives, and summarize the results in the body of the document."

Again, in the FEIS section on Responses to Draft EIS Comments, the Navy appears to deflect this concern with the following response, which claims that any project impact would not exceed the scope of acceptable residential noise limits:

"Similarly, DoD has not yet established significance criteria for noise impacts to residential awakenings for use in NEPA studies. MCO 11010.16 suggests the compatibility of residential land use for bands of Day-Night Average Sound Levels (DNL). As residences outside of the MCB Hawaii boundary are/would be exposed to DNL less than 60 dB, MCO 11010.16 suggests these residences are/would be compatible with existing and proposed/alternative aircraft noise. Because their compatibility designation would not change due to the proposed action or alternatives, the DEIS did not assess the change in residential awakenings." A-5 at p.24, PDF p. 324.

As discussed in the preceding comments, discussing noise impact in terms of DNL is misleading. Because cumulative noise is averaged over a 24-hour period, noise from any one event may be softer or louder than the stated dB DNL noise level. Moreover, while the project's impact is deemed to remain compatible with school and residential land use, the community does not necessarily view "compatible" noise levels as being "desirable" noise levels.

**4. The FEIS identifies the project's impact on the number of off-base housing units available for rent, but does not discuss possible impact on rental housing prices.**

**Comment: Area residents are concerned about the project's impact on the local rental market.**

This concern was brought to life by a community member's statement included in the FEIS:

"Locals cannot compete for housing with military personnel who have housing allowances (locals do not have housing allowances). Landlords raise rents, knowing military personnel can pay the rents. This causes increased homelessness and people having to move in with family members because they cannot afford to rent a place to live. Single parents cannot live in Kaneohe because they cannot afford the rent. Increasing the number of military personnel will worsen this already existing problem." A-3 at p. 3, PDF p. 15.

**Comment: The FEIS estimates that the influx of an additional 2,128 persons to MCBH (1,000 active duty personnel, 22 civilian personnel, and 1,106 dependents associated with the new aircraft squadrons) will increase demand for off-base housing in the Windward Oahu area by about 3.2 percent.**

The FEIS contains a detailed discussion and analysis of the project's potential impact on rental housing (particularly in Kailua and Kaneohe) as well as future population growth and housing supply estimates. It accounts for ongoing expansion of on-base housing for families and enlisted bachelors, as well as natural population growth independent of the proposed project. The FEIS concludes that the increased demand for housing associated with the additional aircraft squadrons would amount to a "very small" increase for most of the island. Assuming the increase will be distributed geographically (dispersed proportionately throughout Oahu according to existing rental trends), Windward Oahu, particularly Kailua, is estimated to experience a 3.2 percent increase in rental housing demand:

"The new demand would amount to a very small increase for most of the island. In Windward Oahu, especially in Kailua, increased demand by some 3.2 percent could well be noticed.

However, that demand would develop over time as the new squadrons come to MCB Hawaii Kaneohe Bay. No sudden increase in demand for rental housing is anticipated." 3-122, PDF p. 272.

**Comment:** Given the projected 3.2 increase in demand for Windward Oahu rental housing, the FEIS should address any corresponding impact on rental prices in this area. However, this was not done, and the discussion of housing impacts is therefore incomplete.

To its credit, the FEIS does acknowledge that Marines at higher pay levels receive housing allowances, and can thus afford to rent at prices higher than average rents in the Kailua and Kaneohe areas. It also notes that because the housing allowance rates are public knowledge, local landlords are expected to set rents by Marines' ability to pay.

Given the fact that rental housing prices are affected by landlords' assessment of how much MCBH personnel can afford to pay, the influx of additional renters will surely drive up the cost of nearby rental housing. Although MCBH personnel may choose to live in areas other than Kailua and Kaneohe, the reality is that people are willing to pay a premium for housing that is close to where they work. Therefore, a more detailed discussion of the project's impact on rental costs in these areas is warranted. Unfortunately, the extent of the FEIS' discussion on rental prices in Windward Oahu is limited to the following, with no further discussion:

"With an increase in the number of Marines renting in Windward Oahu, competition between civilians and Marines for housing would increase slightly and could affect a slightly more affluent range of renters than at present." 3-123, PDF p. 273.

**CONCLUSION:** Based on the foregoing deficiencies of the FEIS, I would respectfully request that the Navy reject this FEIS and prepare a revised document that adequately addresses the deficiencies identified in this letter.

Sincerely,

*Cynthia*

*Representative Cynthia Thielen  
Assistant Republican Leader  
50<sup>th</sup> Representative District (Kailua, Kaneohe Bay)*

Cc: US Environmental Protection Agency, Region IX  
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*Judiciary (Ranking Member), Energy & Environmental Protection (Ranking Member),*

*Water, Land & Ocean Resources (Ranking Member), Consumer Protection & Commerce, and Housing Committees*

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**From:** Dawn Pamarang [pamarang@hawaii.edu]  
**Sent:** Tuesday, July 10, 2012 9:10 AM  
**To:** mv22h1eis  
**Subject:** FEIS Comments-Navy for the Basing of MV-22 and H-1 Aircraft  
**Attachments:** FEIS Dept of the Navy.pdf

Please complete the following information:

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**Add to Mailing List?** NO

**Comments:** Please find attached our comments for the Dept. of the Navy – Marines MV-22 and H-1 Aircraft FEIS. The original hard copy is being mailed to you.



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July 9, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

Dear Sir or Madam:

Thank you for the opportunity to comment on the Final Environmental Impact Statement (FEIS) for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii. We appreciate your addressing our comments to the Draft Environmental Impact Statement (DEIS). Our current comments are focused on proposed activities on the Island of Hawaii and those near Pohakuloa Training Area (PTA) and Bradshaw Army Airfield (BAAF) given the proposed 27% increase in annual airspace operations, on top of the estimated 38% increase in baseline airspace operations anticipated under the 'no action alternative'.

The Office of Mauna Kea Management is responsible for managing Conservation District lands leased by the University of Hawaii from the State of Hawaii on Mauna Kea in keeping with existing, publicly available land use plans including a Master Plan (2000) and Comprehensive Management Plan (2009). These land use management plans identify objectives of focused management of resources and operations of the Mauna Kea Science reserve in order to protect historic/cultural resources, protect natural resources, protect and enhance education and research, protect and enhance recreational opportunities, and promote public safety (Mauna Kea Science Reserve Master Plan, 2000, page II-4). Of the 11,288 acres of University of Hawaii managed lands; a Natural and Cultural Preservation Area designation applies to 10,760 acres with the remaining 525 acres designated as an Astronomy Precinct.

The specific concerns which prompt us to write at the FEIS 30-day waiting period phase include:

- 1) The statement and corresponding lack of impact analyses that there are no noise sensitive communities or land uses near PTA.

The FEIS incorrectly states there are no noise sensitive communities or land uses in the PTA area. In previous Department of Defense NEPA documents affecting PTA, the U.S. Army HAMET Environmental Assessment for example, the Office of Mauna Kea Management identified Mauna Kea as having noise-sensitive land uses where anthropogenic sounds and aircraft noise

present direct and tangible impacts to existing land uses and the user community. FEIS comment responses justifying this lack of assessment do not acknowledge this land use or user community. We also agree with the National Park Service DEIS comments that use of Day-Night Average Sound Level (DNL) averages to assess impacts of noise is insufficient and believe the FEIS comment response to be inadequate. Impacts from aircraft noise differ drastically from during daylight (to visitors and biota) compared to noise at night. Without a differentiated analysis of daytime and nighttime, the environmental impacts cannot be characterized for these sensitive land uses and different user communities.

- 2) Impact analyses and potential mitigations for both visible light pollution (at night) and other wavelengths of the electromagnetic radiation spectrum (during both day and night), from aircraft and stationary sources near PTA, are missing.

CEQ regulations (1502.16(c)) require discussions of possible conflicts between the proposed action and the objectives of Federal, regional, State, and local land use plans, policies and controls for the area concerned. Aviation lights and electromagnetic radiation emissions represent documented and publicized potential adverse impacts to State of Hawaii planned, permitted, and regulated land uses on Mauna Kea (regarding day and nighttime astronomical observing as opposed to biota). FEIS comment responses to this issue state that applicable laws apply only to stationary light sources, yet CEQ regulations require assessment of all environmental effects and possible conflicts with land use plans, which clearly call out the detrimental impacts of light and other form of electromagnetic radiation pollution regardless of source (CEQ Regulation 1502.16(c)). These light and electromagnetic radiation concerns encompass not only visible light but also submillimeter and radio frequencies, which military aircraft may emit. For example, the National Radio Astronomy Observatories 'Very Long Baseline Array' (VLBA) facility has installed filters to mitigate for existing PTA radio emissions; and the facility does not allow use of microwave ovens, 2-way radios, or many other small and large engine devices (such as ATVs) as the impacts are not readily mitigated. The VLBA, and other Mauna Kea observatories, operate during both day and night hours, often in coordination with observatories scattered across the globe.

- 3) A socioeconomic environment impact assessment and mitigation with regard to use of lasers during astronomical observations, both in the context of safety impacts to Marine aviators and impacts to observatory operations, is missing.

The observatories on Mauna Kea which use lasers in astronomy are required to inform and coordinate their activities through U.S. Air Force Space Command, which has the ability to deny or restrict laser use. Mauna Kea observatories also routinely coordinate night-time laser operations directly with PTA. In addition, the observatories employ aircraft spotters and cease certain operations when aircraft are spotted within the parameters defined by Federal Aviation Administration (FAA) regulations. Yet FAA regulations are not always applicable to military aviators, and the potential hazards to military aviators from laser astronomy are substantially increased when operating outside of standard civilian aviation parameters (without

transponders or running lights for example). In such circumstances the ability of the observatories to take corrective action and ensure the safety of military aviators is greatly reduced or eliminated entirely. The increase in proposed aviation activities has potential for substantial adverse impact. As a planned and regulated land use, an analysis of proposed impacts to and from laser astronomy practices for Mauna Kea astronomy is needed to fulfill CEQ regulations. Simply identifying and analyzing allowable flight paths for day and night flights (separately), similar to what was done for noise concerns, would greatly facilitate identification of such individual and cumulative impacts.

- 4) The air quality impacts from aircraft emissions on astronomy activities at Mauna Kea are not analyzed.

Aircraft emissions are identified as an impact, yet the only reference standards are State of Hawaii Department of Health values. The impacts of emissions to sensitive land uses, such as astronomy, are neither acknowledged nor analyzed.

These potential adverse impacts from the proposed activities are substantial and not addressed in the FEIS. Looking only at laser safety activities to ensure pilot and aviator safety; according to SAE International, G10t Laser Safety Hazards Committee, when discussing astronomy observatories and laser safety programs “the total cost for safety observers may be over \$1,000,000/year” (<http://standards.sae.org/wip/as6029>, 06/15/12). The scope of potential impacts from aircraft noise, electromagnetic radiation, and emissions on identified land uses at Mauna Kea are, in our opinion, at least equally significant.

In order to fulfill the purpose of NEPA and CEQ regulations, we propose the following be included in a revised FEIS and Record of Decision (ROD).

1. An analysis of noise impacts for PTA and the Island of Hawaii be prepared, as was done for other sites in Appendix D of the Final Environmental Impact Statement. This will communicate information about potential impacts associated with potential flight paths to affected noise and light sensitive communities. Once completed, this analysis should be included as an FEIS addendum which limits and defines the geographic location and altitude of allowable flights for proposed activities as outlined in the ROD.
2. The ROD identify all potential flight paths and set a maximum allowable altitude ceiling of 10,000' elevation when flying over Island of Hawaii airspace. This will assist observatory aircraft spotters in their efforts to minimize impacts to (laser) astronomy land uses and allow observatories to work with the Marine Corps to adapt allowable flight paths to minimize unacceptable impacts. This will minimize impacts to existing (astronomy) land uses from light and other forms of electro-magnetic radiation pollution from aviation sources. This will also limit potential impacts of operational aircraft emissions to Mauna Kea observatories. Potential aviation activities which need to exceed such a cap would be addressed through our third ROD recommended mitigation (below).

3. The ROD require coordination of all Island of Hawaii military flight activity in cooperation with the Mauna Kea observatories. This is current practice for many aviation activities at PTA and helps ensure the safety of aviators from the hazards of laser astronomy. A similar and suggested model is practiced with U.S. Air Force Space Command for consolidated space planning. The observatories and all branches of the U.S. military cooperatively consult regarding activities in or affecting space, minimizing conflicting uses and coordinating to mutual benefit. In addition to helping prevent potential catastrophic or fatal injuries to marine aviators, coordination of aviation activities will also allow observatories to better manage and schedule their activities and land uses.

We sincerely appreciate the Department of the Navy and Marine Corps' efforts with this FEIS and continued public engagement. We also recognize that many of the issues raised here would ideally have been reiterated during the Draft Environmental Impact Statement phase. However, we also believe these activities and issues have previously been identified in this and other NEPA processes at PTA and on the island of Hawaii, yet were not addressed here. Please do not hesitate to contact us if we can be of assistance in sharing information, crafting a mutually beneficial solution to the concerns identified, or by other means.

Sincerely,



Stephanie Nagata  
Director

c: Observatory Directors

---

**From:** Jayne LeFors [jayne.lefors@noaa.gov]  
**Sent:** Wednesday, July 11, 2012 7:06 AM  
**To:** mv22h1eis  
**Subject:** NMFS comments on MV22/H1 FEIS  
**Attachments:** 12-07-10\_NMFS\_Letter to Navy re FEIS Basing of MC Helis in Hawaii.pdf

Hello,

Please see the attached comment letter from NMFS Pacific Islands Regional Office. We are also mailing a hard copy today.

Thank you,  
Jayne LeFors

--  
Jayne LeFors  
858-546-5653  
NEPA Project Manager, Protected Resources Pacific Islands Regional Office



**U.S. DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
**NATIONAL MARINE FISHERIES SERVICE**  
Pacific Islands Regional Office  
1601 Kapiolani Blvd., Suite 1110  
Honolulu, Hawaii 96814-4700  
(808) 944-2200 • Fax (808) 973-2941

July 10, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

Dear Sirs,

This letter provides comments on the Final Environmental Impact Statement (FEIS) for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force (MEF) Elements in Hawaii. The National Marine Fisheries Service (NMFS) Pacific Islands Regional Office's Protected Resources Division was only recently made aware of this EIS by staff from the National Park Service at Kalaupapa National Historical Park. We were not notified or provided a copy of the DEIS by your agency and therefore did not have an opportunity to comment on it during the developmental stages.<sup>1</sup> We therefore now provide the following comments regarding how the development may affect protected marine species under our jurisdiction.

The critically endangered Hawaiian monk seal (*Monachus schauinslandi*) is protected under the ESA, and is known to frequently haul out on the beaches and rocky shorelines adjacent to the area of Kalaupapa Airport on Molokai that is proposed for Confined Area Landing and Night Vision Device Trainings. Many monk seal pups have been born and raised on Kalaupapa's beaches, and it is known to be one of the most productive pupping areas in the Main Hawaiian Islands. Because this species is sensitive to disturbance, especially during pupping and rearing, our agency is concerned that the increased noise from the proposed use of the Marine Medium Tiltrotor (VMM) and Marine Light Attack Helicopter (HMLA) squadrons could have deleterious effects both to individuals and the population as a whole.

In June 2009, NMFS published a 12-month finding stating that it intended to revise critical habitat for the Hawaiian monk seal. In June 2011, NMFS proposed the expansion of critical habitat in the northwestern Hawaiian Islands and proposed the addition of six new areas around the main Hawaiian Islands including terrestrial and marine habitat. If the designation is finalized as proposed, the shoreline areas near the Kalaupapa Airport would be included as monk seal critical habitat. These beaches and rocky shorelines provide essential features for pupping, and nursing habitat that is unique in the Main Hawaiian Islands because they provide shallow and sheltered areas that are relatively undisturbed by human presence.

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<sup>1</sup>It appears that a copy of the Notice of Intent (NOI) was sent to the research branch of our agency, rather than the regulatory office. According to the Notice of Intent Distribution List included in Appendix A, Public Disclosure and Outreach, the NOI was sent to Dr. Samuel Pooley, who is the Director of the NMFS Pacific Islands Fisheries Science Center (PIFSC). The PIFSC does not have responsibility for implementation of the Endangered Species Act (ESA) or the Marine Mammal Protection Act (MMPA); that responsibility is held by the NMFS Pacific Islands Regional Office (PIRO) and specifically by the Protected Resources Division. The NOI and a copy of the DEIS should have been sent to our Regional Administrator, Michael Tosatto, who would have ensured that it came to our Division for review and comment.



Since 1997, these beaches have provided habitat for over 50 mom and pup pairs, and as such, this area remains important to the survival and recovery of the species.

Pinniped reactions to aircraft overflight are largely dependent on the altitude of the aircraft, the abruptness of the associated aircraft sound, and life cycle stage (breeding, molting, etc.). Hauled out pinnipeds exposed to aircraft sight and/or sound often react by becoming alert and in many cases rushing into the water. Stampedes resulting in mortality to pups (by separation or crushing) have been noted in some cases although it is rare. Helicopters have been known to elicit behavioral reactions such as fleeing or by increasing vigilance. Helicopter approach to landing typically caused the most severe response for California sea lions and Steller sea lions at a rocky haulout off Crescent City in northern California (NOAA 2010). Responses were also dependent on the species with Steller sea lions being more “skittish” and California sea lions more tolerant.

According to the Figure 4-3 on page 4-53 of the document, the DNL contours for the area surrounding the Kalaupapa Airport indicate that the sound levels will increase from a current baseline of 45 DNL to 50, 55, and even up to 60 DNL at the shorelines under the flight paths of the aircraft. Since each doubling of sound results in an increase of 3 dB, this is equivalent to exponential increases of the current sound levels at these sites. Although it is unclear whether the current sound levels affect the monk seal, it seems likely that increasing the sound levels by these magnitudes could result in the disturbance of important behaviors including resting, pupping and rearing of young.

Based on these concerns, we recommend you revise the EIS to include information on the potential impacts to Hawaiian monk seals at Kalaupapa, and that your agency contact our Endangered Species Act Section 7 Coordinator, Pat Opay, by email at [patrick.opay@noaa.gov](mailto:patrick.opay@noaa.gov) or at (808) 944-2242 to discuss the initiation of ESA section 7 consultation for this action. In addition, we recommend that you contact Jolie Harrison at NMFS Headquarters Office to discuss an MMPA Letter of Authorization (LOA) for potential Level B Harassment of the Hawaiian monk seal: [jolie.harrison@noaa.gov](mailto:jolie.harrison@noaa.gov) , (301)427-8401.

If you should have any questions regarding these comments, please contact Jayne LeFors on my staff at (858) 546-5653 or at the e-mail address [jayne.lefors@noaa.gov](mailto:jayne.lefors@noaa.gov) .

Sincerely,



Alecia Van Atta  
Assistant Regional Administrator  
for Protected Resources

cc: National Park Service, Kalaupapa National Historical Park

### Reference

National Oceanic and Atmospheric Administration. (2010). National Marine Fisheries Service's Final Biological Opinion for the Proposed Issuance of a United States Coast Guard Permit to the St. George Reef Lighthouse Preservation Society to Maintain the St. George Reef Lighthouse as a Private Aid to Navigation and its Effect on the Federally Threatened Eastern Distinct Population Segment of Steller Sea Lion and Designated Critical Habitat. (pp. 106)

---

**From:** Steve.Molmen@hawaii.gov  
**Sent:** Wednesday, July 11, 2012 2:59 PM  
**To:** mv22h1eis  
**Subject:** EIS for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii  
**Attachments:** III Marine Expeditionary Force.pdf

Dear Sir or Madam,

Attached, please find our comments on the subject project. No hard copy will be sent.

Best regards,

Steve Molmen, Supervising Land Agent  
Land Division  
Department of Land and Natural Resources  
State of Hawaii  
1151 Punchbowl Street, Suite 220  
Honolulu, HI 96809-0621  
Tel.: (808) 587-0439  
Fax: (808) 587-0455  
Email: [steve.molmen@hawaii.gov](mailto:steve.molmen@hawaii.gov)

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NEIL ABERCROMBIE  
GOVERNOR OF HAWAII



WILLIAM J. AHLA, JR.  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT



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

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

July 11, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)

Dear Sir or Madam,

**SUBJECT: Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii**

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from (1) Land Division – Oahu District; (2) Division of Boating & Ocean Recreation; and (3) Division of Aquatic Resources, on the subject matter. No other comments were received as of our suspense date. Should you have any questions, please feel free to call Supervising Land Agent Steve Molmen at 587-0439. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji  
Land Administrator

Enclosure(s)



**DEPARTMENT OF THE NAVY**  
NAVAL FACILITIES ENGINEERING COMMAND, PACIFIC  
288 MAKALAPA DR., STE. 100  
PEARL HARBOR, HAWAII 96860-3134

RECEIVED  
LAND DIVISION

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Ser EV2/0322  
June 5, 2012

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

To: Distribution

**SUBJECT: ENVIRONMENTAL IMPACT STATEMENT FOR THE BASING OF MV-22  
AND H-1 AIRCRAFT IN SUPPORT OF III MARINE EXPEDITIONARY FORCE  
ELEMENTS IN HAWAII**

In accordance with the National Environmental Policy Act (NEPA), the Department of the Navy, on behalf of the U.S. Marine Corps, has prepared a Final Environmental Impact Statement (FEIS) for the Basing of MV-22 and H-1 Aircraft in Support of Third Marine Expeditionary Force (III MEF) Elements in Hawaii. The Department of the Army is a cooperating agency in this NEPA process.

The FEIS addresses the potential environmental consequences of basing up to two Marine Medium Tiltrotor (VMM) squadrons and one Marine Light Attack Helicopter (HMLA) squadron in Hawaii, including associated construction and renovation of facilities, personnel changes, and training and aviation operations at existing training areas.

Enclosed with this letter is a compact disc with the FEIS files in PDF format. Council on Environmental Quality regulations provide for a 30-day waiting period after the FEIS is published before the proponent may take final action. Agencies and other interested parties may submit comments on the FEIS during this period.

To view the FEIS or submit comments on-line, you are invited to visit the project website at [www.mcbh.usmc.mil/mv22h1eis](http://www.mcbh.usmc.mil/mv22h1eis) (please note: the "1" before "eis" in the website address, is numeric). Comments must be received via the project website or postmarked no later than July 11, 2012 to ensure that they become part of the official record. Mailed comments may be submitted to:

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Attn: MV-22/H-1 EIS Project Manager (EV21)



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

June 13, 2012

**MEMORANDUM**

TO: *ML*

- DLNR Agencies:**
- Div. of Aquatic Resources
  - Div. of Boating & Ocean Recreation
  - Engineering Division
  - Div. of Forestry & Wildlife
  - Div. of State Parks
  - Commission on Water Resource Management
  - Office of Conservation & Coastal Lands
  - Land Division - Oahu District
  - Historic Preservation

FROM: *10*

*Russell Y. Tsuji*  
Russell Y. Tsuji, Land Administrator

SUBJECT: Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of the Third Marine Expeditionary Force (III MEF) Elements in Hawaii

LOCATION: Marine Corps Base (MCB) Hawaii Kaneohe Bay, Island of Oahu

APPLICANT: Department of the Navy on behalf of U.S. Marine Corps.

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by July 6, 2011.

*Only one (1) copy of the document is available for your review in Land Division's, Room 220. However, the cover letter notes that the FEIS can be viewed online at [www.mcbh.usmc.mil/mv22h1e1s](http://www.mcbh.usmc.mil/mv22h1e1s).*

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- (  ) We have no objections.
- (  ) We have no comments.
- (  ) Comments are attached.

Signed: *Tche*  
Date: *6/15/2012*

cc: Central Files



RECEIVED  
LAND DIVISION  
WILLIAM J. MITCHELL, JR.  
CHIEF DIVISION  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND AND NATURAL RESOURCE MANAGEMENT



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

2012 JUN 21 P 3 09

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

June 13, 2012

MEMORANDUM

TO:

**DLNR Agencies:**

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of the Third Marine Expeditionary Force (III MEF) Elements in Hawaii

LOCATION:

Marine Corps Base (MCB) Hawaii Kaneohe Bay, Island of Oahu

APPLICANT:

Department of the Navy on behalf of U.S. Marine Corps.

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by July 6, 2011.

Only one (1) copy of the document is available for your review in Land Division's, Room 220. However, the cover letter notes that the FEIS can be viewed online at [www.mcbh.usmc.mil/mv22hfeis](http://www.mcbh.usmc.mil/mv22hfeis).

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Date:

*[Signature]*  
6/21/12

cc: Central Files

JUN16 12 PM 12:2380R DLN



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LAND DIVISION

WILLIAM J. AHLG, JR.  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSIONER OF WATER RESOURCE MANAGEMENT



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

2012 JUN 27 A 10:25

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

June 13, 2012

DAR436

MEMORANDUM

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation



FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of the Third Marine Expeditionary Force (III MEF) Elements in Hawaii

LOCATION:

Marine Corps Base (MCB) Hawaii Kaneohe Bay, Island of Oahu

APPLICANT:

Department of the Navy on behalf of U.S. Marine Corps.

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by July 6, 2011.

Only one (1) copy of the document is available for your review in Land Division's, Room 220. However, the cover letter notes that the FEIS can be viewed online at [www.mcbh.usmc.mil/mv22h1eis](http://www.mcbh.usmc.mil/mv22h1eis).

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Supervising Land Agent Steve Molmen at (808) 587-0439. Thank you.

Attachments

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Date:

*[Handwritten Signature]*  
26 JUN 2012

cc: Central Files

**Department of the Navy  
Naval Facilities Engineering Command  
Pacific Division  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive  
Suite 100**

**SUBJECT: Final EIS (FEIS) FOR THE BASING OF MV-22 AND H-1 AIRCRAFT IN  
SUPPORT OF THE THIRD MARINE EXPEDITIONARY FORCE (111 MEF) ELEMENTS IN  
HAWAII**

I request that the EPA rate the EIS referenced above as environmentally unsatisfactory and it be assigned a category 3. The FEIS has numerous issues that are non-compliant with the National Environmental Policy Act (NEPA), 42 USC 4332

#### **NOISE**

The FEIS states noise contours representing the proposed action would remain similar in size when compared to contours for the No Action Alternative. "Existing noise sensitive land uses in the surrounding civilian community currently exposed to aircraft noise levels greater than 65 DNL would continue to be exposed to similar noise levels."

The FEIS's noise model is not an accurate measure of the noise generated now or in the future. They failed to use actual sound measurements heard in the surrounding community and relied entirely on a computer model. While this computer model may be useful in other situations, it fails to capture the noise transmission in the bay ringed by mountains with the resulting echoing of noise across the bay and into populated regions.

**The response from the navy was** "The computer noise modeling for the FEIS considered aircraft operations from Runway 04/22 addition to helipads such as Pads 7, 8, 101, and the West Field area at MCB Hawaii Kaneohe Bay. While "revving" of engines (run ups) and hovering were reflected for appropriate aircraft types in the modeling, the proposed MV-22 and H-1 aircraft are not anticipated to conduct run ups at MCB Hawaii Kaneohe Bay".

While it is somewhat reassuring to know that the runups are "not anticipated", the response is flawed. It does not address the lack of actual measurements at points around the bay. We have made measurements at our homes and have found frequent readings ranging from 90-95 dbL.

**The FEIS does not adequately address the impact on children health and education.**

As the EPA mentioned in their response to the DEIS,

- There is data that shows that when children learn in noisier classrooms, they have a more difficult time understanding speech than those who learn in quieter settings. (Nelson, Peggy B. (1959). "Sound in the Classroom". *ASHRAE journal* 45 (2): 22-25\_.

- In 1993, a study conducted by Cornell University revealed, children exposed to noise in learning environments experienced trouble with word discrimination as well as various cognitive developmental delays. (Wakefield, Julie (June 2002). "Learning the Hard Way". *Environmental Health Perspectives* 110 (6)).
- There are several schools in the area affected by the proposed change in operations at MCBH in Kaneohe.

The Navy states in the FEIS that the noise analysis disclosed that public schools in the vicinity would be outside the 55 DNL contour under both the proposed action and the No Action Alternative (see Figure 3-4 in the FEIS). **They also state that "DOD guidelines would not recommend further analysis of these schools."**

Actual measurements of noise during the school day should be done. Common sense tells us that a derivative based on a computer model in a mountainous area may not suffice when it comes to the protection of children. When aircraft repeatedly fly at low attitudes over a school, interruptions in learning occur. Concentration is broken. For example, if loud noises interrupt studies intermittently for 3 hours and the remaining 5 hours are uninterrupted, learning will be affected. The school day has effectively been shortened.

- In addition, the response to the suggestion by the EPA to awakenings was similarly dismissed by the Navy. They respond **"The DOD has not established significance criteria for noise impacts to residential awakenings for use in NEPA studies. ....The DEIS did not assess the change in residential awakenings."**

### **Failure to Consider Reasonable Alternatives**

The alternatives analysis in the FEIS was insufficient. The Navy should have analyzed all reasonable stationing alternatives that might be pursued with less environmental impact. The alternatives section of the EIS gives only options (A and B), each with the same environmental impact.

. As there is substantial cultural, biological and other environmental harm associated with any military training in this area of Hawaii other alternatives including other areas in the Pacific (Guam) should have been examined and discussed in more detail as options.

### **Failure to provide the public with adequate information in a timely manner**

The Navy failed to provide to the public adequate copies of both the FEIS and source documentation during the public comment period. Re: the FEIS, despite it being over 1000 pages long, there were only a few copies at nearby libraries.

The scheduling of the FEIS meeting for Kaneohe Bay residents and comment period deadline was unfair to residents as it fell during the holiday season insuring less opportunity for public scrutiny and comment as many residents were off island or busy with family and visitors. Additionally the Navy refused requests by community groups and individuals to extend the deadline to allow more residents to participate in this FEIS.

The Navy responded to this comment by stating that notices were published in the federal register and local newspapers and that the FEIS public comment period was conducted in accordance with standard practices for NEPA. They also stated that because of the timely nature of these Marine Corps actions, review periods cannot always be extended or planned to avoid everyone's holiday schedules.

This response is ingenuous and infers that the community groups were requesting something unusual... Most people are unavailable during the holiday season. In fact most businesses realize this and do not schedule important meetings or decisions during that time. Many members of the community think the timing was deliberate and resulted in an uninformed community.

### **Health Effects on Humans and other animals**

#### **The response to comment regarding human health effects is inadequate**

**We state the FEIS fails to evaluate potential human health impacts associated with contaminants accumulating bay and ocean water from aviation fuel and may be consumed in foods such as limo and fish.**

- **Elevated noise levels are associated with an increase in serious cardiac disease.** In a large German trial, a day-time average sound pressure level of 60 decibel increased coronary heart disease by 61% in men and 80% in women. As another indicator, a night-time average sound pressure level of 55 decibel increased the risk of heart attacks by 66% in men and 139% in women. Statistically significant health effects started as early as from an average sound pressure level of 40 decibel. (*Tödlicher Lärm - Spiegel, Nr. 51, 14 Dezember 2009, Page 45*)

More recent studies have suggested that noise levels of 50 dB(A) at night may also increase the risk of heart attack by chronically elevating cortisol production. (Franssen EA, van Wiechen CM, Nagelkerke NJ, Lebet E (2004). "Aircraft noise around a large international airport and its impact on general health and medication use". *Occup Environ Med* 61 (5): 405-13. doi:10.1136/oem.2002.005488. PMC 1740783. PMID 15090660.

)<http://www.pubmedcentral.nih.gov/articlerender.fcgi?tool=pmcentrez&artid=1740783>.

^ (?) Lercher P, Hörtnagl J, Kofler WW (1993). "Work noise annoyance and blood pressure: combined effects with stressful working conditions". *Int Arch Occup Environ Health* 65 (1): 23-8. doi:10.1007/BF00586054. PMID 8354571.)

- **Elevated noise levels have been associated with birth defects.** The EPA has described a correlation between low-birth weight babies and higher incidence of birth defects when expectant mothers are exposed to elevated sound levels, such as typical airport environs.
  - Per Lester W. Sontag of The Fels Research Institute (as presented in the same EPA study): "There is ample evidence that environment has a role in shaping the physique, behavior and function of animals, including man, from conception and

not merely from birth. The fetus is capable of perceiving sounds and responding to them by motor activity and cardiac rate change."

(Passchier-Vermeer W, Passchier WF (2000). "Noise exposure and public health". *Environ. Health Perspect.* 108 Suppl 1: 123–31. doi:10.2307/3454637. JSTOR 3454637. PMC 1637786. PMID 10698728.

<http://www.pubmedcentral.nih.gov/articlerender.fcgi?tool=pmcentrez&artid=1637786>)

Elevated noise levels have been reported to create stress, increase workplace accident rates, and stimulate aggression and other anti-social behaviors. (Kryter, Karl D. (1994). *The handbook of hearing and the effects of noise: physiology, psychology, and public health*. Boston: Academic Press. ISBN 0-12-427455-2.)

The Navy's Response does not address these issues appropriately and is confusing. They state..

"Existing regulations and practices serve to limit primary pathways of exposure and have been addressed. Please see response to comment 102-7. Other pathways of exposure may exist but are unlikely to present a substantial risk, considering the relatively low incremental impact associated with the Proposed Action. For this reason, a human health impact evaluation from potential contaminants from the Proposed Action accumulating in marine sources of food, e.g. limu and fish, would not be an appropriate level of evaluation for this NEPA document."

"Much of the data regarding effects of noise on health is inconsistent and unsubstantiated, and suffers from confounding effects inherent in the published studies. As a result, the Defense Noise Working Group (DNWG) finds that the current state of scientific knowledge cannot yet support inference of a causal or consistent relationship between military aircraft noise exposure and non-auditory health consequences for exposed residents (see Findings/Conclusions in the DNWG Technical Bulletin on the Non-Auditory Health Effects of Aircraft Noise, August 2011)." I looked for this publication and could not locate it in any peer reviewed publications. It appears to be published in a military publication suggesting that there might be a potential conflict of interest and that may be more of a confounding effect than the data they discounted above..

#### **The FEIS did not present adequate data on the effect on wildlife**

There are 68 endangered/threatened/protected species present in the affected area some of which are the hoary bat, monk seals, whales, green sea turtles and blue herons. Studies evaluating noise have shown disturbances of normal behavior including disruptions of feeding and mating.

[http://www.nature.nps.gov/naturalsounds/pdf\\_docs/wildlifebiblio\\_Aug2011.pdf](http://www.nature.nps.gov/naturalsounds/pdf_docs/wildlifebiblio_Aug2011.pdf)

The FEIS minimally addresses these concerns and focuses its analysis of wildlife issues to the effects of bird airstrikes.

**The Navy's Response** The EIS evaluates and discloses that there would be no effect on listed species due to the proposed construction and operations at MCB Hawaii Kaneohe Bay. Please see Section 3.8

**In summary, this FEIS is environmentally unsatisfactory as it fails to adequately address the effects on the environment, numerous omissions, misleading assessments and erroneous data including but not limited to:**

- **The FEIS's conclusion that noise impacts would not significantly impact the surrounding community, recreational areas and the environment is based on flawed and incomplete data and measurements**
- **The FEIS failed to satisfy NEPA's requirements to present complete information on alternative locations**
- **The FEIS failed to provide accurate and complete assessments on the effects on children, human health and the quality of life.**
- **The FEIS did not present adequate assessments on the behavioral and survival impacts on wildlife**

**Respectfully submitted**

**E Hilton MD**



**Kaneohe Bay Drive**

**Kaneohe Hi 96744**

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**From:** Bianca Isaki [bisaki@gmail.com]  
**Sent:** Wednesday, July 11, 2012 4:34 PM  
**To:** mv22h1eis; diann.olson@usmc.mil  
**Cc:** Terri Kekoolani; Eri Oura; Ikaika Hussey; Maxx Phillips; Melisa Casumbal; Brianne Gallagher; Edward Gomes; Renie Wong; Clarence Ching; Isaac Harp; puanani rogers  
**Subject:** Comments on the Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawai'i  
**Attachments:** 07-11 HPJ MV-22 Ospreys NEPA Comment Ltr.pdf

Aloha Project Manager and Diann Olson,

Please find comments on the Navy's Final EIS attached to this email. I am submitting them on behalf of the signatories. We look forward to your response and acknowledgment of receipt.

Sincerely,  
Bianca Isaki, Ph.D.

Attn: EV21, MV-22/H-1 EIS Project Manager  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawai'i 96860-3134  
July 11, 2012

**Re: Comments on the Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawai'i**

Aloha e EV21, MV-22/H-1 EIS Project Manager,

We are writing to comment on the U.S. Department of the Navy's Final Environmental Impact Statement (FEIS) for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawai'i. As the U.S. Marine Corps' website directs, we are submitting our comments on Jul 11, 2012 via the provided email addresses under "Contacts": mv22h1eis@beltcollins.com, Dep't of the Navy, Naval Facilities Engineering Command, Pacific, and to Diann Olson, diann.olson@usmc.mil, Public Affairs Office of the Marine Corps Base Hawai'i.

The grave concerns raised by the Navy/ Marines' proposal to increase military presence in Hawai'i have not been adequately addressed through the National Environmental Protection Act (NEPA) process. FEIS language and presentation have not clearly enumerated the cumulative impacts of your proposed military expansion and your implementation of NEPA public participation processes have failed to respond to widespread sentiments in our community. In just the past two days, Hawai'i Peace and Justice, a non-profit organization based in Hawai'i, has circulated a petition against the Navy/ Marines' proposed action and have addressed it to Neil Abercrombie, Governor of the State of Hawai'i and Hawai'i Congressional Delegation (Senators Daniel Inouye and Daniel Akaka and Representatives Mazie Hirono and Colleen Hanabusa). The petition has met with enthusiastic response from at least 141 individuals in the short time that it has been circulated.

Text of Petition Addressed to Gov. Abercrombie and the Hawai'i Congressional Delegation:

**Halt the implementation of the MV-22 and H-1 Aircraft Project**

As residents of Hawai'i, Kanaka Maoli, and their allies, we oppose implementation of the MV-22 and H-1 Aircraft Project proposed by the American Navy and Marine Corps. We feel that there has not been enough time for substantial discussion with the community to assess the impact of this project. The information provided to the community in their Environmental Impact Statement (EIS) has only raised anxieties about the impacts that this project will have on our communities. We are concerned about the impact the aircrafts and the construction on the bases will have on nearby residential areas, schools, and the environment. The EIS fails to address issues of noise and safety as they apply to specific sites in Hawai'i. For instance, nowhere does the Navy consider material factors such as the reverberation of noise on the Ko'olau mountains across Kane'ohē Bay or

effects on student-learning at King Intermediate, which lies directly across the runways at Kane'ohē MCBH.

We are also disturbed by the Project's failures to address Native Hawaiian community concerns about the military use of sacred lands. We fully support the Native Hawaiian communities' right to invoke Section 106 of the National Historical Preservation Act and demand that consultation procedures be extended to address extant concerns regarding the proper identification and protection of Native Hawaiian cultural, historical sites as defined by Native Hawaiian cultural practitioners and experts.

This situation calls for strong leadership from our State representatives. We demand that the State become accountable to its people and conduct a full and thorough investigation with significant input of community members and allies before any further implementation of this project.

Sincerely,  
[Names]

Our petition addresses State representatives, and not the Navy/ Marines, because your review of and response to our community's grave concerns with military buildup has been dismally lacking. The actual harms and benefits of Alternatives A, B, and "no action" are nowhere adequately balanced against the Navy/ Marines' oft-recited *need* "to be organized, trained, and equipped to provide fleet marine forces of combined arms . . . for the conduct of such land operations as may be essential to the prosecution of a naval campaign." 10 U.S.C. § 5063. In your equation, the need to protect Hawai'i's 'āina against the social, political, and environmental damage of the ongoing U.S. military occupations cannot ever balance out.

We are submitting the text of our petition to ensure your awareness of our community's concerns and to hold you responsible for that knowledge. We understand that the Navy "may request comments on a final environmental impact statement before the decision is finally made." 40 C.F.R. § 1503.1(b). While applicable regulations only explicitly require your agency to comment on the draft EIS (see 40 C.F.R. § 1503.4), as a matter of administrative law, the Navy is required to consider FEIS comments before it issues its Record of Decision and justifies its ultimate conclusion. See, e.g., Southeast Alaska Conservation Council v. Federal Highway Admin., 649 F.3d 1050 (9th Cir. 2011).

We hope that your ultimate conclusions reflect an awareness of the deep hewa that the FEIS describes and your administration of NEPA processes has exacerbated.

Sincerely,  
Renie Lindley, Executive Director, Hawai'i Peace and Justice  
Terri Keko'olani, Hawai'i Peace and Justice  
Ikaika Hussey, Hawai'i Peace and Justice  
Eri Oura, Hawai'i Peace and Justice

Puanani Rogers, Ho'okipa Network – Kaua'i  
Isaac "Paka" Harp  
Edward J. Gomes, Jr. Kailua, O'ahu, Kekahua 'o Kualii  
Kūkauakahi (Clarence Ching), A Hawaiian National  
Bianca Isaki, Ph.D.  
Gwen Kim, Ka'a'awa, O'ahu  
Maxx Philips  
Melisa Casumbal-Salazar, Ph.D.  
Brianne Gallagher

317 Kaneohe Bay Drive  
Kaneohe, Hi. 96744

Department of the Navy  
Naval Facilities Engineering Command  
Pacific Division  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive  
Suite 100

**SUBJECT: Final EIS (FEIS) FOR THE BASING OF MV-22 AND H-1 AIRCRAFT IN SUPPORT OF THE THIRD MARINE EXPEDITIONARY FORCE (111 MEF) ELEMENTS IN HAWAII**

**SUBJECT: Final Environmental Impact Statement (FEIS) FOR THE BASING OF ADDITIONAL PERSONNEL AND MV-22 AND H-1 AIRCRAFT IIN SUPPORT OF THE THIRD MARINE EXPEDITIONARY FORCE (111 MEF) ELEMENTS IN HAWAII**

I am a resident of Kaneohe living on Kaneohe Bay Drive and a firm supporter of the Marine Corps and its mission in defense of our country. As I previously stated, I fully concur with the necessity for vigorous training with all assets that they require. I also believe that this training can be conducted in a manner that maintains and protects a healthy and enjoyable environment. I believe that the Navy's responses to my comments were inadequate in several respects and that they have not fulfilled their obligation under the National Environmental Policy Act ("NEPA"), 42 USC 4332.

**Failure to Analyze Alternatives Objectively**

The FEIS falls short of satisfying NEPA's mandate to analyze the impact of stationing alternatives for both equipment and troops. The fact that MCBH is the only infantry division that does not routinely train with rotary winged lift aircraft suggests a prior recognition of the facilities inadequacy to do so without adverse impact on the population living close by as well the environment. Long-standing residents of Kaneohe testified at their distress with the noise generated by Harrier jets. They noted a significant improvement in her quality of life and these aircraft were no longer in use. Their current concern is predominantly the noise implications of the addition of rotary winged aircraft (MV 22) and also the larger jet engine replacement for the P3 (P8). An additional expressed concern was the safety record of the MV 22 with multiple crashes reported. This aircraft would be flying over homes and the bay with many recreational boaters. It is still unclear whether the additional troop and equipment placement at Kaneohe is a military or political consideration. There is no apparent analysis suggesting the military imperative for placement of this additional personnel and equipment at MCB Hawaii versus other potential locations (e.g. mainland, Guam etc.). This suggests the decision may have been more political rather than military.

**Failure to Analyze Impacts Associated with the Military Training a MCBH**

The FEIS still fails to provide adequate analysis of the impact of stationing in Hawai'i additional permanently assigned troops and equipment. The claim that there would be no additional cumulative impact appears to defy common sense. Even if the new equipment (MV- 22, P-8) was less noisy than their predecessors (unlikely), the increase in training exercises would clearly increase the amount and duration of noise generated. This additional activity and noise will clearly have an adverse impact on the quality of life, and by extension local real estate values. It would have been far more convincing to have presented data with the actual sounds measurements of the current versus the new equipment in various locations in the neighborhood rather than dependent on a model. A fairly simple demonstration of the realities of use of this equipment prior to the final decision we have gone a long way in reassuring the public of the absence of any significant impact. Is there a plan in place to scale down or back if actual measurements demonstrate that model was incorrect for inadequate?

In short the noise is clearly the community's greatest concern.. Previous studies across the world have reported the adverse medical consequences of living close to an airport. There is also considerable data on the adverse effect on learning in school age children. Yet in response to my comment "increased frequency of exposure" the answer was simply that the DOD does not yet have established significance criteria for noise impacts related to frequency of exposure. This again defies commonsense and the available scientific literature.

The FEIS still does not present adequate data on the potential adverse effect of increased aircraft activity and noise on the public's enjoyment of recreational activities, tourism, and the economics of recreationally based businesses.

- The FEIS previously inaccurately describes the most affected area as low density misquoting Honolulu's City's General Plan (DGP 2002) as a "residential areas with limited future population growth." The plan clearly indicates that, on the contrary, "limited growth potential" is consequent to the evidence that it is already fully populated. The Navy's response was that the concept of low density was based on the predominance in this area of single-family residential use. They neglected the more important fact that these homes were concentrated in a dense belt around the bay and hence directly affected by noise and other adverse conditions.
- The FEIS's computer noise model is not an actual measurement of the noise generated now or in the future. They failed to use actual sound measurements placed in the surrounding community to establish a baseline and measure the actual change in noise pollution when the newer aircraft come on line. This is especially concerning in local affected schools. No plan was forwarded as to after the fact monitoring of the impact of this new equipment and increased personnel.

**In summary, this FEIS still has not adequately addressed a wide variety of impacts including:**

- **Incomplete information on alternative locations.**

- **Incomplete quantitative and especially qualitative assessment of noise pollution and particularly its impacts on education in local schools.**
- **Incomplete assessment of the medical impact of this additional noise pollution on human health as well as quality of life.**
- **Incomplete or absent strategy on how, should they're modeling prove incorrect, they would address the concerns of the public especially on the issue of noise abatement.**

Sincerely,  
L.J. Rossoff, MD  
Kaneohe Bay Drive



---

**From:** Laura Morgenstein [laura.morgenstein@gmail.com]  
**Sent:** Wednesday, July 11, 2012 3:08 PM  
**To:** mv22h1eis  
**Subject:** FEIS Comment  
**Attachments:** Marine Base.doc

Please complete the following information: Name: Company/  
Organization: Mailing Address: City: State: Zip Code: Add  
to Mailing List? (Yes or No): Comments:

Laura Morgenstein, Kokokahi Community Association, 45-267 Kokokahi Place, Kaneohe, HI 96744. Please add to mailing list.

June 21, 2012

Attn: MV-22/H-1 EIS project Manager (EV21)

I'm up again. It's 2:45 a.m. Helicopters hovering over Kaneohe Bay have awakened me with their relentless vibrating drone. Tomorrow I will make plans to sleep in another room that doesn't face the ocean. I have lived in this house for 40 years and the nighttime helicopter noise is now horrible.

The Kokokahi Community, (about 200 homes on Kokokahi Place), is off Kaneohe Bay Drive on the hillside facing the center of Kaneohe Bay. It was subdivided into house lots from the mountain to the sea in 1927. On what map is our community shown in the FEIS?

During World War II, my neighbor, Mrs. Leong, had her house taken over by the military and used for a camp kitchen. Her friend and neighbor, a Japanese doctor, was taken away to an interim camp. We've done our part.

Throughout the years, Kokokahi community members have held meetings, contacted the Kaneohe Neighborhood Board, and called noise complaint phone numbers supplied by the Marine Base . . .

Now we are concerned. We have never experienced the sound of an Osprey aircraft. Will it be louder than what we hear now? Will they be carrying weapons and putting us at risk for crashes? Will the emissions pollution go up? Will Osprey aircraft be flying at night over Kaneohe Bay?

What pushes a community to the point where it finally says "no more"?

Laura Morgenstein  
Kokokahi Community Association

---

**From:** Renie Lindley [renie.lindley@yahoo.com]  
**Sent:** Wednesday, July 11, 2012 3:48 PM  
**To:** mv22h1eis  
**Subject:** copy of submission to EPA reviewer Tom Kelley  
**Attachments:** 12.07.11letter to Tom Kelley EPA.docx

July 11, 2012

EPA Reviewing  
Attn: Tom Kelley  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
[Kelly.thomasp@epa.gov](mailto:Kelly.thomasp@epa.gov)

Dear Mr. Kelley

I am very concerned with the lack of response to Kaneohe residents' legitimate complaints and concerns regarding the safety and noise problems facing them if the Marine Corps brings in additional aircraft and personnel.

The EPA is supposed to be an Environmental Protection Agency by and for the people (the taxpayers). This Environmental Impact Statement written by the Dept. of the Navy does not adequately address environmental protection, either for the people or the environment.

Is it your position that "national security" trumps EPA laws? If so, why? Personally, I think we are in greater, not lesser, danger by pumping up the military presence here in Hawai'i, making us a bigger target.

Sincerely,

Renie Wong Lindley

July 11, 2012

EPA Reviewing  
Attn: Tom Kelley  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105

Kelly.thomasp@epa.gov

Dear Mr. Kelley

I am very concerned with the lack of response to Kaneohe residents' legitimate complaints and concerns regarding the safety and noise problems facing them if the Marine Corps brings in additional aircraft and personnel.

The EPA is supposed to be an Environmental Protection Agency by and for the people (the taxpayers). This Environmental Impact Statement written by the Dept. of the Navy does not adequately address environmental protection, either for the people or the environment.

Is it your position that "national security" trumps EPA laws? If so, why? Personally, I think we are in greater, not lesser, danger by pumping up the military presence here in Hawai'i, making us a bigger target.

Sincerely,

Renie Wong Lindley

---

**From:** Renie Lindley [renie.lindley@yahoo.com]  
**Sent:** Wednesday, July 11, 2012 3:54 PM  
**To:** mv22h1eis  
**Subject:** comment on EIS for MCBH

Please complete the following information: Name: Company/Organization: Mailing Address: City: State: Zip Code: Add to Mailing List? (Yes or No): Comments:

Renie Wong Lindley  
Hawai'i Peace and Justice  
2426 O'ahu Ave.  
Honolulu, HI 96822

Do not add to mailing list

Comments:

I am very concerned with the lack of response to Kaneohe residents' legitimate complaints and concerns regarding the safety and noise problems facing them if the Marine Corps brings in additional aircraft and personnel.

The EPA is supposed to be an Environmental Protection Agency by and for the people (the taxpayers). This Environmental Impact Statement written by the Dept. of the Navy does not adequately address environmental protection, either for the people or the environment.

Is it your position that "national security" trumps EPA laws? If so, why? Personally, I think we are in greater, not lesser, danger by pumping up the military presence here in Hawai'i, making us a bigger target.

---

**From:** Renie Lindley [renie.lindley@yahoo.com]  
**Sent:** Wednesday, July 11, 2012 10:08 PM  
**To:** mv22h1eis  
**Subject:** Petition opposing basing of Osprey signed by 83  
**Attachments:** Petition to oppose the basing of Osprey.zip

To Whom It May Concern:

Re: Petition to Oppose the Basing of MV-22 and H-1 Aircraft at MCBH (Kaneohe)

The petition reads: "We the undersigned are concerned citizens who urge our leaders and elected representatives to act now. We oppose the plan to increase aircraft operations and bring the MV-22 and H-1 helicopters to Kaneohe Bay. We feel there will be a negative impact on noise, our health and education of our children, cultural history, view plane, wildlife and quality of life."

There are 83 signatories. More on the way.

















# Petition to Oppose the Basing of MV-22 and H-1 Aircraft at MCBH (Kaneohe)

Petition Summary and Background	The US Marine Corps plans to bring the MV-22 Osprey and H-1 helicopters to Hawaii
Action petitioned for	We the undersigned are concerned citizens who urge our leaders and elected representatives to act now. We oppose the plan to increase aircraft operations and bring the MV-22 and H-1 helicopters to Kaneohe Bay We feel there will be a negative impact on noise, our health and education of our children, cultural history, view plane, wildlife and quality of life.

Printed name	Signature	Address	Email	Date
Renie Lindley		PO Box 765 Haleiwa 96712	renie.lindley@yahoo	7/7/12
Deborah KIMBALL		808 Hausten 96826	dkk@hawaiiintel.net	7/7/12
JOHN WAXTON		240X KUKU ST HNL 96813	johnwaxton@planninghawaii.com	7/7/12
BYRON BENDER		6710 Hawaii Kai Dr. HNL 96825	byronbender@hawaii.com	7/7/12
Ramona Hassey		Box 61951, Hono 96839	ramona@lava.net	7/7/12
Robert Bley-Vroman		2131A Atherton 96822	vroman@hawaii.edu	7/7/12
Jean King		PO Box 10517 Honolulu 96816		7/7/12
SANFORD YEE		3680 LILIOE PL. HON		7/7/12
Alexandra Bley-Vroman		2131A Atherton R, 96822	sashabv@gmail.com	"
Maurine King		2475 Pali Highway 96817		"
ROBERT SIMON		7179 AUPU PL KAILUA HI 96734		7/7/12
Thomas Huff		256 E. Manoa Rd. Hon. 96822		7/7/12
B. DOWNS		2516 E. Manoa Rd. Hono 96822		7/7/12
ELYN POOL		46-082 PAWENST. KANEOHE		
WINIFRED J. SIMON		1079 AUPU PL A.		7/7/12
Anne Fong		580 Uluhaku Kailua 96734		7/7/12
Mary Ann Maguire		2607 Halekua Dr. Hono 96821		7/7/12
Suzanne Marwede		PO Box 891, Honolulu 96808		7/7/12
Kitty O'Reilly		46-017 Lilipuna Rd, Kaneohe	KittyO@aol.com	7/7/12
Ona Lee		3680 Lilioe Pl. Honolulu		7/7/12
Judith A. Hall		323 D Keleopala Dr. Kailua, HI		7/7/12
Annunzio P. Hill		1747 Pali Way, Hono. HI 96816		
Peggy Braden		2428 Fenderson Ave 96821		7/7/12
NICOLITA GARCES		2027 WILCOX LN #105 HONO, HI	91019 nmsgarces@gmail.com	7/7/12
Tagi Oloouale		2740 Kuilei St. #2201, Hono, HI	96826 canoeetree@gmail.com	7/7/12
Joy ENOMOTO		2965 KEDNI ST #A, HONO, HI	96822 joyenomo@gmail.com	7/7/12
Steve Dinion		1441 Victoria St Hono HI 96822	sdinion@mac.com	7/7/12
TERRI KEROLANS		3704 Pali Pl Hono HI 96816	napua4@yahoo.com	7/7/12
Eri OUYA		49-463 Mapunapu Rd Kailua HI 96734	erichs05@gmail.com	7/7/12
Monique Yuen		2168-A Maha Pl. Hono. HI 96819	drmoniqueyuen@gmail.com	7/7/12
Darlene Rodriguez		44-338 ulukou St Mililani 96789	DRRODRIGUES2001@yahoo.com	7/7/12
Bernardo Rodriguez		44-338 ulukou St Mililani 96789		7/7/12

---

**From:** Richard Hey [hey@soest.hawaii.edu]  
**Sent:** Wednesday, July 11, 2012 1:48 PM  
**To:** mv22h1eis  
**Subject:** MV-22 & H-1 training

Please complete the following information: Name: Company/Organization:  
Mailing Address: City: State: Zip Code: Add to Mailing List? (Yes):  
Comments:

Please don't fly over houses or late at night. I'm surprised there aren't non-populated areas where pilots could practice.

--  
Aloha,  
Richard Hey  
2525 Correa Road  
Honolulu, HI 96822

---

**From:** Shirley Samuelson [koe@hawaii.rr.com]  
**Sent:** Wednesday, July 11, 2012 1:06 PM  
**To:** mv22h1eis  
**Subject:** More than noise of concern

Please complete the following information: Name: Company/Organization: Mailing Address: City: State: Zip Code:  
Add to Mailing List? (Yes or No): Comments:

I am Shirley Samuelson, 47-795 Ahuimanu Rd, Kaneohe, HI 96744. This is a comment; without knowing what the mailing list would mean, I will say NO.

I have been prompted to comment because the last few weekends I have been canvassing in Kaneohe neighborhoods makai of Kamehameha Highway (in Kaneohe) and walking the area, I came to realize just how very dense the population is. It is way beyond what the mail boxes indicate. In the areas that will be most impacted, I found houses stacked two to four deep from single addresses appearing on the road. Shoes on doorsteps (plus people responding) led me to realize these multi houses are homes to full-size families--many people packed in a small area.

It is this population density and the potential for CIVILIAN CASUALTIES that concern me:

1) In the event of a crash (another Osprey crash) in the area, the possibility of civilian casualties is more of a probability.

2) With the White House's intention to push for Asian Pacific relationships, beefing up MCBH with the greater part of our air ability--planes and personnel-- is frightening considering the density of the population in the area. The potential for MCBH as a preferred target and consequent civilian casualties in the event of an attack should be seriously considered in the impact statement.

Mahalo,  
Shirley Samuelson



United States Department of the Interior

NATIONAL PARK SERVICE  
Kalaupapa National Historical Park  
P.O. 2222  
Kalaupapa, HI 96742



Tel: 808-567-6802  
Fax: 808-567-6729

July 11, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Tel: (808) 472-1196  
Email: [mv22h1eis@beltcollins.com](mailto:mv22h1eis@beltcollins.com)

**Subject: Comments on the Final Environmental Impact Statement (FEIS) for Basing MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii**

To EV21, MV-22/H-1 EIS Project Manager:

Through NHPA Section 106 consultation, we understand that there will not be any increase in the current operations at Kalaupapa by decreasing CH-53 use to allow for H-1 access. We extend our appreciation to the MCBH cultural resource staff and other consulting parties for taking the effect on the Kalaupapa NHL and National Historical Park seriously. For the purposes of comments on the FEIS, we would like to be sure that the existing number of current operations at Kalaupapa is represented in the NEPA Record of Decision. While we appreciate that the MCBH will not be increasing operations, the Environmental Impact Statement should still reflect the effects and impacts to both natural and cultural resources under the existing number of operations. Consideration of traditional cultural properties on the Kalaupapa peninsula should be included, as presented by the National Park Service, consulting parties, and the Hawaiian community. Therefore, we are commenting on the full FEIS in this letter.

**Executive Summary:**

ES-6 1-9. Please clarify the statement "one exception to continued use of aviation training at non-military sites is being Contemplated".

ES-9 line 7-8. We request specifics on frequency or reference to where this information is located within the FEIS.

**Chapter 1: Purpose and Need**

1-22 line 1-18. Aircraft noise. Please see our comments regarding sound / noise under Chapter 6: Impacts Summary.

1-23 line 4-10. This summary fails to encapsulate an overarching concern expressed by the National Park Service, NHOs, and community members during Section 106 consultation, particularly as it relates to the proposed undertaking at Kalaupapa airport, but expressed throughout consultation regarding several locations. Repeatedly, consulting parties requested that MCBH recognize "traditional cultural properties". This is more than a "spiritual dimension of resources" but acknowledges the traditional practices and activities associated with place. According to the National Register Bulletin "Guidelines for Evaluating and Documenting Traditional Cultural Properties" (1990), a traditional cultural

property is “eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that are a) rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community”. No effort to identify traditional cultural properties was done during the identification of resources phase of this project, despite early requests from the National Park Service to do so. Additionally, a summary of the concerns for effects on traditional cultural properties is not encapsulated by referencing the “spiritual dimension” alone.

## **Chapter 2: Proposed Action and Alternatives**

2-2 line 28. In addition, the Marine Corps may occasionally conduct specific aviation training exercises at selected airports with permission from DOT, Airports Division. Please reference source in footnotes or text.

Safety address – There has been no address of safety measures to support military training at Kalaupapa airport. In the absence of a public hospital or care facility, please delineate the measures that will be taken in the event of an emergency or disaster with the aircraft. Also, please address whether crash zones have been identified in the scoping effort, and plans for helicopter maintenance if needed, should unforeseen mechanical problems occur.

## **Chapter 4: Other Training Areas**

4-10. This section notes that Kalaupapa views include the sea and the tall cliffs but it fails to denote the significance of the aesthetic and visual resources as per the NHL designation and that the location is adjacent to a National Natural Landmark.

4-12/13. “Based on preliminary review of other training areas, this section states that aircraft noise would not be an issue given their distance from noise sensitive receptors and that noise... “. The discussion fails to take into consideration the incompatibility of flight noise in a National Park. Previous sound studies in Kalaupapa show that the ambient noise is relatively low (draft General Management Plan)<sup>1</sup>, and a Hawaii DOT EIS from 1991 notes the annoyance of the military flight noise from the resident-patient community. It’s true that the increased air use alternatives would remain within the same type of land use, however, the flight noise and frequency of flight noise is without a doubt, incompatible with a National Park.

4-106. The discussion does not mention that the level of training could vary at Kalaupapa and therefore level of impact to wildlife. No reference or study is mentioned for how the conclusion of no impacts on natural resources was arrived at. The DNL metric is used for determining land use compatibility in community settings- not for wildlife habitat suitability. No reference is provided for supporting the use of the DNL metric and threshold of 65 for determining impacts to wildlife. There is no analysis of visual impacts of aircraft on monk seals. Pinnipeds may be disturbed by low flying aircraft. No mention is made of any avoidance of humpback whales or seals that may be required under the MMPA.

4-156. Kalaupapa – review of archaeological resources and traditional cultural resources states that there are no identified traditional cultural resources within the APE, which is defined as the “entire NHL” (pg 466 line 21). MCBH never conducted research to identify traditional cultural resources (properties). The NPS has provided documentation concerning traditional cultural resources, including TCPS, on the peninsula. Consultation meetings via phone and on island also featured community members asserting the entire peninsula is a TCP and has sacred value to Hawaiians. The Final EIS fails to incorporate the documentation provided by the National Park Service regarding potential effects at Kalaupapa on the setting, feeling, and location of the site.

4-165, Lines 21-22. Training Areas on the Islands of Molokai and Maui/Kalaupapa Airport, Island of Molokai, state that the Marine Corps is contemplating various levels of aviation training from that analyzed throughout the FEIS under the proposed action to reduced use (including no new use) at Kalaupapa Airport. The discussion really didn’t elaborate on why and what the changes in impact might be but defers it to the outcome of Section 106 consultation. We want to be sure that the agreement in the PA is properly referenced and recorded in the ROD.

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<sup>1</sup> Kalaupapa National Historical Park is preparing a General Management Plan / Environmental Impact Statement. The plan is presently being prepared, information on the plan can be found at: [www.nps.gov/kala](http://www.nps.gov/kala).

## Chapter 6: Impacts Summary

Please find our comments on Table 6-7. Summary of Impacts for Kalaupapa Airport below:

<b>Airspace</b>	<p>Please explain how under the No Action Alternative, total airport operations would increase slightly. Since Kalaupapa is such a remote location, we are dependent on air travel to accommodate daily necessities including mail, food delivery, transport to medical facilities, etc. Recall that there is NO ROAD ACCESS at Kalaupapa. With this being so, we have great concern over an increase in operations that would cause an increase in airspace under Alternatives A and B.</p>
<b>Noise</b>	<p>The metric used for the helicopter noise modeling, DNL (day-night level), is a noise energy averaging metric and does not provide the actual noise levels generated during the training events. The assumption is that the training takes an hour per day but the noise from that time period is averaged over a 24-hour period. We cannot make direct comparisons to the data that was collected for the Department of Transportation report because it reports the ambient data in different metrics but looking at the noise contours from the modeling is sufficient for gauging the level of noise impacts.</p> <p>There are many sources that acknowledge that DNL is not an adequate metric for measuring the intrusion of aircraft noise on quiet environments, including FAA's NEPA guidance, 1050.1E. DNL is primarily used around airports to gauge the level of community annoyance to noise and is generally inadequate to describe the soundscape in quiet areas. Neither day-night level nor percent highly annoyed is an appropriate metric for measuring noise in naturally quiet areas (pages 6 and 24 and Technology for a Quieter America, National Academy of Engineering of the National Academies, 2010). DNL certainly is not an appropriate measure to gauge the impact of noise on the feeling or spirit of place at KALA.</p> <p>Having noted the above, based on the additional helicopter noise modeling provided, the proposed action results in a substantial increase in the noise foot print from the proposed helicopter training even though the flight tracks do not cross over the settlement area. Even with the 24-hour averaging which has the effect of diluting the impact, the increase in the amount of noise is very evident based on the expansion on the expansion of the contours and how far out from the airport the 45 DNL contour extends compared to the No Action and baseline conditions. It is difficult to justify how such a large increase in the noise footprint caused by the proposed action does not have an adverse impact on the natural and cultural soundscape at KALA since this helicopter training has nothing to do with supporting or maintaining the residents or associated in anyway with the purposes of the park.</p>
<b>Biological Resources (Marine)</b>	<p>The NPS disagrees that there would be no significant impact on ESA-listed marine species under Alternatives A and B. Furthermore, there is an impact to these species under the No Action Alternative that is currently not documented.</p> <p>First of all, no study was done to document effects of current operations on ESA species so the conclusion is not supported. MCBH cannot use the NPS data to determine the impact, because the NPS study was designed to answer a different question. One would expect to see results that examined changes in behavior with and without current flight operations.</p> <p>Second, there is no evidence or study to support the second conclusion that impacts from "proposed operations would be the same". Modeling results are presented, but based on Figure 4-3 (Page 4-53), it appears that the Day-Night Average Sound Level (DNL) range is 4-5X larger for the proposed action than the no-action alternative and cuts a swath through prime monk seal pupping beaches. Therefore, it is not logical that an increase in sound level would have the same impact as the no-action alternative.</p>

	<p>Third, the only included study on biological resources by SWCA examined birds and bats at other sites but left out any mention of the Molokai sites and species.</p> <p>Fourth, the NPS did not find any input from USFWS on the Section 7 consultation regarding monk seals at Kalaupapa. Other species and locations were mentioned, but not this critically endangered one.</p> <p>Potential disturbance to Humpback whales (endangered species) during winter and early spring months when they migrate around Kahi Point, just north of the airport, to Hawaiian monk seals (critically endangered species) that utilize beaches at Īlio pi'i and Papaloa for pupping from February to September and also haul out at Ho'olehua year around. These beaches are some of the best pupping areas in the entire Main Hawaiian Islands (Brown et al., 2011)<sup>2</sup>, and disturbance to Green sea turtles (threatened species) that utilize nearshore waters around the airport year around.</p> <p>We request to see records of consultation and concurrence with NOAA and USFWS that proposed activities would not negatively impact the marine mammals and seabirds in the area and especially the endangered species that utilize the Kalaupapa Peninsula.</p> <p>We request that flight activity be conducted only from November to March when monk seals are less abundant and pupping activity is minimal. This flight activity might still impact humpback whales that transit around the point, but the more significant impact to pupping activities of the critically endangered Hawaiian monk seal would be diminished.</p> <p>We request financial support for monitoring activities of monk seals at Ho'olehua beach off the eastern end of the runway for at least 2 years before and at least 3 years after the change in flight activities.</p> <p>In addition, NOAA proposed Kalaupapa as critical habitat for the monk seal in the Federal Register (June 2, 2011). Final determination should be coming out later this year. The FEIS briefly discusses this rule with respect to Kaneohe MCBH but fails to address the issue for Kalaupapa.</p> <p>In general, we felt the FEIS was incomplete regarding impacts on ESA species, especially marine species.</p>
<p><b>Biological Resources (Terrestrial)</b></p>	<p>The analysis of potential effects of increased helicopter training activities on native plant communities and rare individual plant species at Kalaupapa NHP lacks rigor.</p> <p>The area adjacent the Kalaupapa airport runway includes both sandy and mineral soil habitats. While the area incorporates non-native ironwood, previous surveys have described the coastal strand vegetation at Kalaupapa as exceptionally diverse coastal habitat with remarkably intact native vegetation (Canfield 1990)<sup>3</sup>. Sandy beaches with native vegetation are relatively rare on the Kalaupapa peninsula, the remainder of Molokai, and Hawaii in general. The rare nature of intact coastal vegetation is due to the effects of development and associated disturbance. As such, the coastal areas of the Kalaupapa peninsula may become the focus for restoration efforts to re-establish rare plants.</p> <p>The area adjacent the runway includes the only population of <i>Pseudognaphalium sandwicense</i> var.</p>

<sup>2</sup> Brown, Eric, Guy Hughes, Randall Watanuki, Thea Johanos, Tracy Wurth (2011) The Emergence of an Important Hawaiian Monk Seal (*Monachus schauinslandi*) Pupping Area at Kalaupapa, Moloka'i in the Main Hawaiian Islands. Aquatic Mammals 37: 319-325.

<sup>3</sup> Canfield, Joan E. 1990. Description and map of the plant communities of the Northeast Coastal Spray Zone of the Kalaupapa National Historical Park. Cooperative National Park Resources Studies Unit, University of Hawaii at Manoa, Department of Botany.

	<p><i>molokaiense</i> (C/PEP) on the Kalaupapa peninsula. The seed are light and would easily be blown by rotor-wash, as is the sandy soil substrate in which the plant grows. The sandy beaches offer habitat for another rare psammophilous plant - <i>Solanum nelsonii</i> (C).</p> <p>Other rare plants known to have or currently occurring along the Kalaupapa coastline include <i>Tetramolopium rockii</i> (T) and <i>Centaurium sebaeoides</i> (E). The coastline adjacent the airport runway (to the East) offers habitat for <i>Scaevola coriacea</i> (E) and <i>Sesbania tomentosa</i> (E).</p> <p>Please consider the effects of increased helicopter training activities at Kalaupapa National Historical Park on these rare plants.</p> <p>[C=candidate, E=Endangered, PEP=focal species for the Hawaii Plant Extinction Prevention Program, T=Threatened]</p>
<p><b>Cultural Resources (Historic Buildings, National Historic Landmark)</b></p>	<p>Thank you for addressing the omission in the DEIS of the National Historic Landmark status at Kalaupapa National Historical Park. The No Action Alternative should also note this status, even though it is 'No change'.</p> <p>Since the NHL is the historic property for which one should analyze effect and impact, all alternatives should note that there are over 200 historic buildings that contribute and are located within the NHL.</p>
<p><b>Cultural Resources (Archaeological Resources)</b></p>	<p>Thank you for noting the archaeological site 1897 near the airport runway which includes a complex of surface residential, agricultural, and possible burial structures, and is part of the Kalaupapa Field System. However, there are a number of other archaeological sites that are also included within the general vicinity of the airport runway, and hundreds more that contribute and are located within the NHL. Due to site sensitivity, we have not included a map displaying all of the recorded archaeological sites, but we can tell you that aside from the Ladefoged (1990)<sup>4</sup> survey, there are other surveys immediately in the airport runway vicinity including a ko'a first recorded in 1909 by Stokes<sup>5</sup> and numerous other sites recorded in the Airport Survey and Kahiu Benchmark Surveys (McCoy 2005)<sup>6</sup>.</p> <p>We are concerned about the rotor-wash, vibrations from aircraft, and potential crash incidents causing an effect /impact on the archaeological resources under every alternative.</p> <p>We appreciate that Table 6-7 notes the minimization of impacts by removing the MV-22s. We are concerned, however, that the rest of the mitigation statement states: "Aviation activities for the H-1s will be determined through continuing NHPA Section 106 consultation. Findings, including any mitigation will be documented in the PA." Through NHPA Section 106 consultations, we understand that there is a new proposed undertaking at the Kalaupapa location, not a 'finding'. With this being so, the language quoted above is no longer correct. This must be documented in the ROD.</p>
<p><b>Cultural Resources (Traditional)</b></p>	<p>There is complete absence of this type of cultural resource in the FEIS. In going through the identification process, MCBH should have recognized that Kalaupapa contains properties of traditional religious and cultural importance to Native Hawaiians. Though the TCP is not documented to date,</p>

<sup>4</sup> Ladefoged, T.N. "A dryland agricultural system at Kalaupapa, Molokai: Archaeological Inventory Survey, Airport Improvement Project." 1990.

<sup>5</sup> Stokes, John F. G. "Collection of Notes." 1909.

<sup>6</sup> McCoy, Mark D. "Kalaupapa Archaeology: A Collection of five Archaeological Surveys in Kalaupapa National Historical Park." 2005.

<b>Cultural Properties [TCP])</b>	<p>conversations through NHPA Section 106 consultation with NHO's, the NPS, and other agencies should have given the MCBH enough information to understand that the TCP is eligible for the National Register and is affected / impacted by flight activities in all alternatives.</p> <p>Although discussed in Chapter 3: Kaneohe Bay, we have concern over the way "Traditional cultural resources" are described. The paragraph in 3-63 distinguishes traditional cultural resources from traditional cultural properties. Reference source for term. The NHPA lists "culture" as a category of history property. The text in this paragraph interprets this as being separated from other historic property types and not covered under NHPA. Traditional cultural properties are protected under the National Historic Preservation Act to the same extent as other property types, A property possessing cultural significance may be eligible for the National Register according to the National Register "Guidelines for Evaluating and Documenting Traditional Cultural Properties", and therefore subject to the same protection as other properties. The paragraph appears to be distinguishing traditional cultural resources like sacred places as different from traditional cultural properties (which are covered under NHPA).</p>
<b>Natural Hazards</b>	<p>Mistake in the summary table- natural hazards: airport is in tsunami evac zone? Doesn't seem right. Wildland fires: says that MV-22 aircraft would land... should not have MV-22s in this undertaking</p>

If you have any questions please call or email Erika Stein at Kalaupapa National Historical Park 808 567-6802 x 1702  
[Erika.stein@nps.gov](mailto:Erika.stein@nps.gov).

Sincerely,

  
 Stephen Prokop  
 Superintendent, Kalaupapa National Historical Park

07/10/12

CC:

Christine S. Lehnertz, NPS PWRO (digital copy) [christine\\_lehnertz@nps.gov](mailto:christine_lehnertz@nps.gov)

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**From:** Nguyen, Tuong M CIV FRC-SW, 6.5.3.3, AESO [tuong.m.nguyen@navy.mil]  
**Sent:** Wednesday, July 11, 2012 8:51 AM  
**To:** mv22h1eis  
**Subject:** Comments - EIS for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii  
**Attachments:** AESO Comment on Aircraft Emissions in FEIS\_R02.docx; Calc Check of Emissions for FEIS.xlsx  
**Signed By:** tuong.m.nguyen@navy.mil

Please complete the following information:

Name: Tuong Nguyen  
Company/Organization: U.S. Navy Aircraft Environmental Support Office  
Mailing Address: Fleet Readiness Center Southwest, Code 08212, Building 810  
City: San Diego  
State: California  
Zip Code: 92135-7058  
Add to Mailing List? (Yes or No): Yes

Comments: Please see attached.

V/R,

Tuong

## **AESO Comments on Aircraft Emissions in**

### **FEIS for the Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii**

Please see the red texts in "Calc Check of Emissions for FEIS.xlsx" for details.

#### **MV-22:**

1. Added fuel used (lb/ops) for vertical departure, vertical arrival, Touch & Go, GCA Box (sheet "MV-22" cells G4:G10)
2. Revised emission index of SO<sub>2</sub> (SO<sub>2</sub> EI) from 0.4 to 2.04 lb/1000 lbs of fuel (sheet "MV-22" cells K3:K30). Reference: AESO Memorandum Report No. 2012-01.
3. Added green house gas (GHG) emission indexes for methane CH<sub>2</sub>EI) and nitrous oxide (N<sub>2</sub>OEI) in column P and Q. Reference: AESO Memorandum Report No. 2012-02
4. The emission factors of CH<sub>4</sub> used in FEIS were unreasonably high compared to total hydrocarbon emission (THC) factors. CH<sub>4</sub> emission index should be a fraction of THC.
5. Recalculated SO<sub>2</sub> emission in column T using SO<sub>2</sub>EI (lb/1000 lb of fuel)
6. Calculated CH<sub>4</sub> and N<sub>2</sub>O emissions in column Y and Z respectively using GHG emission indexes (lb/1000 lbs of fuel). Please see Appendix for the derivation.
7. Revised CO<sub>2</sub> emission for MCAS Maintenance & Testing from "NA" to actual numbers (Cells MV-22!X12:X30).
8. Included subtotal of CO<sub>2</sub> emission for MCAS Maintenance & Testing (cell MV-22!X31) into Total MV-22 Emission (Cell MV-22!X33)

#### **AH-1:**

The process is similar to MV-22 comments above.

#### **UH-1:**

1. Changed Engine Mode label in UH-1!E19 from 25% Q to 27% Q. It was just a typo error in FEIS.
2. Changed Engine Mode label in UH-1!E22 from 27% Q to 25% Q. It was just a typo error in FEIS.
3. The rest is similar to MV-22 comments above.

#### **Note:**

There is a difference in quantifying emission of criteria pollutants and green house gases (GHG). Criteria pollutant emissions are calculated based on the fuel consumed by the aircraft under 3000 ft. The GHG emissions must be quantified using total fuel consumed by the aircraft in regardless

of altitude. AESO assumes that MV-22 and H-1 Aircraft are low flying aircraft and all operations are below 3000 ft.

**References:**

1. Aircraft Environmental Support Office. *Sulfur Dioxide Emission Index Using JP-5 Fuel*. AESO Memorandum Report No. 2012-01. May 2012.

## Appendix

### Derivation of Greenhouse Gas Emission Indices

#### Data:

Fuel type: JP-5

Density: 0.8164 kg/L @ 15°C (PQIS 2010, page 67)  
3.0904 kg / gallon

Chemical formula: C 7.16 H 13.87 (ARP1533A , page 8)

Carbon content: =  $(7.16)(12.01) / [(7.16 \times 12.01) + (13.87 \times 1.008)] = 0.8602$  kg carbon / kg fuel

#### Calculate N<sub>2</sub>O Emission Index:

N<sub>2</sub>O Emission Factor: 0.31 g / gallon fuel (GRP v 1.1, Table 13.6, Tier A Method)

N<sub>2</sub>O EI =  $(0.31 \text{ g / gallon fuel}) (\text{gallon} / 3.7854 \text{ Liter}) (1/0.8164 \text{ kg/ L}) = 0.1003$  g / kg fuel

#### Calculate CH<sub>4</sub> Emission Index:

CH<sub>4</sub> Emission Factor: 0.27 g / gallon fuel (GRP v 1.1, Table 13.7, Tier A Method)

CH<sub>4</sub> EI =  $(0.27 \text{ g / gallon fuel}) (\text{gallon} / 3.7854 \text{ Liter}) [1/(0.8164 \text{ kg/ L})] = 0.0874$  g / kg fuel

#### Note:

The unit (g/kg fuel) and (lb/1000 fuel) are interchangeable.

#### References:

1. PQIS 2010: PQIS 2010 Annual Report, Petroleum Quality Information System
2. ARP1533A: Procedure for the Analysis and Evaluation of Gaseous Emissions from Aircraft Engines
3. GRP: General Reporting Protocol version 1.1



UH-1 Emissions

Emission Factors

Emission (ton/yr)

Activity	Operation	Unit	Number of Engine	Engine Mode	TM	FF per Eng	Unit	CO	NOx	SO2EI	PM10	PM2.5	ROG	CO2	CH4EI	N2OEI	CO	NOx	SO2	PM10	PM2.5	ROG	CO2	CH4	N2O
Cruise	4944.5	hrs/yr	2	Idle	5	164.0	lb/1000 lb	10.54	5.55	2.04	4.20	4.20	0.56	3218.27	0.0874	0.1003	22.15	11.67	4.29	8.83	8.83	1.18	6760.30	0.18	0.21
Mountain Pad Touch & Go	1230	ops	2	Idle	10	164.0	lb/ops	0.76	0.36	2.04	0.28	0.28	0.04	213.93	0.0874	0.1003	0.47	0.22	0.08	0.17	0.17	0.02	131.57	0.05	0.06
Non-MCAS Subtotal:	850	ops				46	lb/ops	0.54	0.25	2.04	0.19	0.19	0.03	148.67	0.0874	0.1003	0.23	0.11	0.04	0.08	0.08	0.01	63.18	0.04	0.04
Stop & Go	1127	ops				61	lb/ops	0.79	0.32	2.04	0.26	0.26	0.04	195.57	0.0874	0.1003	22.85	11.99	4.41	9.08	9.08	1.21	6955.05	0.27	0.32
T&G	3100	ops				46	lb/ops	0.54	0.25	2.04	0.19	0.19	0.03	148.67	0.0874	0.1003	0.84	0.39	0.15	0.29	0.29	0.05	110.20	0.05	0.06
GCA Box	341	ops				209	lb/ops	2.46	1.12	2.04	0.88	0.88	0.12	671.22	0.0874	0.1003	0.42	0.19	0.07	0.15	0.15	0.02	114.44	0.14	0.16
MCAS Subtotal:																	1.70	0.76	0.29	0.59	0.59	0.09	455.09	0.20	0.23
B&B Wash @50ft hrs:																									
Engine change:	Main Engine	ops/fac	2	Idle	5	164.0	lb/1000 lb	39.81	3.28	2.04	4.20	4.20	2.54	3059.84	0.0874	0.1003	0.04	0.00	0.00	0.00	0.00	0.00	2.71	0.00	0.00
	Main Engine	ops/fac	2	25%Q	5	341.4	lb/1000 lb	14.04	5.07	2.04	4.20	4.20	0.61	3204.69	0.0874	0.1003	0.03	0.01	0.00	0.01	0.01	0.00	5.91	0.00	0.00
High Power:	Main Engine	ops/fac	2	Idle	10	164.0	lb/1000 lb	39.81	3.28	2.04	4.20	4.20	2.54	3059.84	0.0874	0.1003	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00
	Main Engine	ops/fac	2	25%Q	10	341.4	lb/1000 lb	14.04	5.07	2.04	4.20	4.20	0.61	3204.69	0.0874	0.1003	0.00	0.00	0.00	0.00	0.00	0.00	0.66	0.00	0.00
Tail Rotor change:	Main Engine	ops/fac	2	Idle	60	164.0	lb/1000 lb	39.81	3.28	2.04	4.20	4.20	2.54	3059.84	0.0874	0.1003	0.22	0.02	0.01	0.02	0.02	0.01	16.86	0.00	0.00
	Main Engine	ops/fac	2	27%Q	60	354.5	lb/1000 lb	13.38	5.15	2.04	4.20	4.20	0.59	3207.29	0.0874	0.1003	0.16	0.06	0.02	0.05	0.05	0.01	38.20	0.00	0.00
Main Rotor Change:	Main Engine	ops/fac	2	Idle	10	164.0	lb/1000 lb	39.81	3.28	2.04	4.20	4.20	2.54	3059.84	0.0874	0.1003	0.00	0.00	0.00	0.00	0.00	0.00	0.20	0.00	0.00
	Main Engine	ops/fac	2	25%Q	10	341.4	lb/1000 lb	14.04	5.07	2.04	4.20	4.20	0.61	3204.69	0.0874	0.1003	0.00	0.00	0.00	0.00	0.00	0.00	0.44	0.00	0.00
MCAS Maintenance & Testing Subtotal:	Main Engine	ops/fac	2	Idle	10	164.0	lb/1000 lb	39.81	3.28	2.04	4.20	4.20	2.54	3059.84	0.0874	0.1003	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0.00	0.00
	Main Engine	ops/fac	2	25%Q	10	341.4	lb/1000 lb	14.04	5.07	2.04	4.20	4.20	0.61	3204.69	0.0874	0.1003	0.00	0.00	0.00	0.00	0.00	0.00	0.66	0.00	0.00
MCAS Total:																	2.16	0.85	0.33	0.68	0.68	0.11	521.32	0.20	0.23
<b>Total UH-1 Emissions:</b>																	<b>25.01</b>	<b>12.85</b>	<b>4.74</b>	<b>9.76</b>	<b>9.76</b>	<b>1.33</b>	<b>7476.37</b>	<b>0.48</b>	<b>0.55</b>

Note:  
Number of aircraft = 12

- (1) AESO 9824B
- (2) AESO 9961A



**MCAS Emissions**

Squadron/Aircraft (Total aircraft)	Activity	MCAS Emissions (tons/yr)									
		CO	NOx	SO2	PM10	PM2.5	ROG	CO2	CH4	N2O	
VMM/MV-22 (24 aircraft)	Operations	7.04	16.56	4.11	2.80	2.80	0.12	6,490.12	0.18	0.20	
	Maintenance and Testing										
	<b>Subtotals:</b>	<b>3.55</b>	<b>6.31</b>	<b>1.59</b>	<b>1.05</b>	<b>1.05</b>	<b>0.06</b>	<b>2,516.01</b>	<b>0.07</b>	<b>0.08</b>	
HMLA/AH-1 (15 aircraft)	Operations	10.59	22.86	5.71	3.84	3.84	0.17	9,006.13	0.24	0.28	
	Maintenance and Testing	2.55	1.14	0.43	0.89	0.89	0.13	682.34	0.02	0.02	
	<b>Subtotals:</b>	<b>0.57</b>	<b>0.12</b>	<b>0.05</b>	<b>0.11</b>	<b>0.11</b>	<b>0.03</b>	<b>82.79</b>	<b>0.00</b>	<b>0.00</b>	
HMLA/UH-1 (12 aircraft)	Operations	3.12	1.26	0.49	1.00	1.00	0.17	765.13	0.02	0.02	
	Maintenance and Testing	1.70	0.76	0.29	0.59	0.59	0.09	455.09	0.20	0.23	
	<b>Subtotals:</b>	<b>0.46</b>	<b>0.10</b>	<b>0.04</b>	<b>0.09</b>	<b>0.09</b>	<b>0.03</b>	<b>66.23</b>	<b>0.00</b>	<b>0.00</b>	
	<b>Totals:</b>	<b>2.16</b>	<b>0.85</b>	<b>0.33</b>	<b>0.68</b>	<b>0.68</b>	<b>0.11</b>	<b>521.32</b>	<b>0.20</b>	<b>0.23</b>	
		<b>15.88</b>	<b>24.97</b>	<b>6.53</b>	<b>5.52</b>	<b>5.52</b>	<b>0.45</b>	<b>10,292.58</b>	<b>0.47</b>	<b>0.54</b>	

**Non-MCAS Emissions**

Squadron/Aircraft (Total aircraft)	Activity	MCAS Emissions (tons/yr)									
		CO	NOx	SO2	PM10	PM2.5	ROG	CO2	CH4	N2O	
VMM/MV-22 (24 aircraft)	Operations	38.68	199.00	37.04	26.78	26.78	0.66	58,352.48	1.59	1.82	
	Operations	18.12	9.48	3.49	7.18	7.18	0.96	5,502.59	0.15	0.17	
HMLA/AH-1 (15 aircraft)	Operations	22.85	11.99	4.41	9.08	9.08	1.21	6,955.05	0.27	0.32	
	Operations										
	<b>Totals:</b>	<b>79.65</b>	<b>220.48</b>	<b>44.94</b>	<b>43.04</b>	<b>43.04</b>	<b>2.83</b>	<b>70,810.12</b>	<b>2.01</b>	<b>2.31</b>	

**Total Aircraft Emissions within Hawaii (MCAS Emissions + Non-MCAS Emissions)**

Total Aircraft Emissions	Emissions (tons/yr)									
	CO	NOx	SO2	PM10	PM2.5	ROG	CO2	CH4	N2O	
	95.53	245.45	51.46	48.56	48.56	3.29	81,102.70	2.48	2.84	

**Total GHG Emissions**

Squadron/Aircraft (Total aircraft)	GHG Emissions <sup>1</sup>				
	CO2 (tons/yr)	CH4 (tons/yr)	N2O (tons/yr)	CO2e (MMtons/yr)	
VMM/MV-22 (24 aircraft)	67,358.61	1.83	2.10	0.07501	
HMLA/AH-1 (15 aircraft)	6,267.72	0.17	0.20	0.00698	
HMLA/UH-1 (12 aircraft)	7,476.37	0.48	0.55	0.00844	
<b>Totals:</b>					<b>0.09043</b>

**Note 1:** Carbon dioxide equivalent (CO2e) emissions from aircraft were calculated from a knowledge of the amount of fuel consumed during the flight. AESO assumed that total fuel usage was captured for entire flight operations regardless of altitude.

Please submit comments at a public meeting or on this website (select "Contact" on the menu and submit your comments via email to the MV-22/H-1 EIS Project Manager), or send comments by mail to:  
Department of the Navy Naval Facilities Engineering Command, Pacific 258  
Makalapa Drive, Suite 100 Pearl Harbor, HI 96860-3134 ATTN: EV21, MV-  
22/H-1 EIS Project Manager.

Comments must be received or postmarked by December 26, 2011.

## **Contact Information**

The contact for this project is:

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
Attn: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134  
Tel: (808) 472-1196  
[Email: mv22h1eis@beltcollins.com](mailto:mv22h1eis@beltcollins.com)

For media inquiries, please contact:

Maj. Alan Crouch  
Public Affairs Office  
Marine Corps Base Hawaii  
Box 63002  
MCB Hawaii Kaneohe Bay, HI 96863-3002  
Tel: (808) 257-8870  
[Email: alan.crouch@usmc.mil](mailto:alan.crouch@usmc.mil)

<http://www.mcbh.usmc.mil/mv22h1eis/>

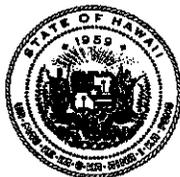
Patricia S. Collins  
Hc1 Box 295  
Kaunakakai HI  
96748

Attention: EIS Project Manager,

I have lived on Molokai for 44 beautiful years. The presence of military air and ground forces practicing on this small fragile island is unthinkable. It would impact negatively the entire population of indigenous people and newcomers like myself.

Molokai has powerful history and small land mass which must be preserved. There was impact here when the military was here in the past without air and ground activities in the extreme. Please do NOT militarize Molokai.

Patricia S. Collins



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
P. O. BOX 3378  
HONOLULU, HI 96801-3378

In reply, please refer to:  
DOH/CWB

07008PMR.12

July 13, 2012

Department of the Navy  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawaii 96860-3134

Attention: MV-22/H-1 EIS Project Manager (EV21)

Dear Sir/Madame:

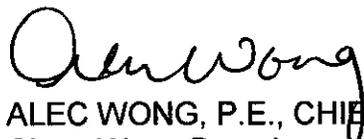
**SUBJECT: Comments on the Environmental Impact Statement (EIS) for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii Marine Corps Base Hawaii Kaneohe Bay and various U.S. Army, Navy, and Marine Corps training areas, Islands of Oahu, Hawaii, Molokai, and Kauai, Hawaii**

The Department of Health (DOH), Clean Water Branch (CWB), has reviewed the subject document and has no comments at this time. The DOH-CWB provided comments on the Notice of Intent to Prepare an EIS for this project (Letter No. 08032PMT.10, dated August 16, 2010).

Please note that our review is based solely on the information provided in the subject document and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at: <http://hawaii.gov/health/environmental/env-planning/wqm/landuse/landuse.html/CWB-standardcomment.pdf>.

If you have any questions, please visit our website at: <http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact the Engineering Section, CWB, at (808) 586-4309.

Sincerely,



ALEC WONG, P.E., CHIEF  
Clean Water Branch

MR:jst

c: DOH-EPO.# 12-112 [via e-mail only]

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**From:** hw huyler [hwhuyler@yahoo.com]  
**Sent:** Friday, July 13, 2012 4:49 PM  
**To:** mv22h1eis; talktomccs@usmc-mccs.org  
**Cc:** repthielen@capitol.hawaii.gov; vacoba@honolulu.gov; foster@capitol.hawaii.gov; bmarshall@honolulu.gov; Kaneohe Bay Residents Initiative  
**Subject:** NOISE & Basing the MV-22 and H-1 at MCB Hawaii

Open Email (Letter) to All Concerned,

I could not find the email for the Commander MCBH, Dept of Navy, or Commandant of the Marine Corp -- therefore I am sending to mv22h1eis and talktomccs.

We don't need AC noise waking us between 10PM and 7AM. We don't need AC noise interfering with student studying. We don't need to be scared of possible accidents occurring.

When MCBH aircraft noise blocks out conversations in my living room.  
When MCBH aircraft noise is louder than my television.  
When MCBH aircraft noise wakes me from sleep.  
I do not need aircraft stationed at MCBH.

When the name of the Kaneohe Marine Base was changed from MCAS-HI or very similar to MCBH -- WHY WAS THIS? WHY DID THIS HAPPEN?

The Marine Corp Air Station Hawaii seems to always have remained MCAS-HI. This name change seemed to be a subterfuge to make the surrounding community think that the Kaneohe Marine Base was something other than what it was??? Haven't the aircraft always remained at the Base?

The following provides additional basis of subterfuge. It is my belief that some of the construction of aircraft (AC) facilities at MCBH during the past 10 or so years seems to have been in preparation of this expansion with newer aircraft. I do not remember the MCBH military being open about this expansion.

During this same period, more or less, wasn't the aircraft facilities at Eva (wasn't this Barbers Point) BRACed. All of the military needs to make coordinated efforts instead of overlooking capabilities and making the tax-paying public, children and families suffer.

The following email extracts are pertinent to my position.

-- On Fri, 7/13/12, ThomasP Kelly <Kelly.ThomasP@epamail.epa.gov> wrote:  
H Huyler, (I have edited Mr Kelly's comments to help explain my position)

... Most importantly, I hope you have submitted your comments directly to the Navy, at mv22h1eis@beltcollins.com, for their consideration.

Additional comments to the Navy can still have an affect the project, as the next step in the process is for the Navy to prepare a Record of Decision....

... Noise is highly subjective, and what is highly annoying for one person may not bother the next. For this project, the noise levels are below those normal.... (Huyler added -- blocking out TV sound and living room conversation -- seems to be more OBJECTIVE)

////////// end Kelly notes //////////// //////////// start my added comments //////////// (I cut and pasted above -- in my email -- the FIRST paragraph)

The following material that I cut from an Air Traffic Controller's (ATC) email a very pertinent to my point of view -- of course the remainder of what was said by the ATC also impacts our discussion.

3. I am concerned about the performance of the new generation of aircraft departing runway 22, fully loaded with gas and explosive sonar buoys' in the event of an engine failure.
4. The Osprey has been grounded again for safety concerns. How many accidents is it going to take?

Plus the following from an email by E Hilton, MD -- • The FEIS failed to provide accurate and complete assessments on the effects on children, human health and the quality of life.

LJ Rossoff, MD in his Monday, July 9, 2012 3:21 PM email brought up more details on "WHY AC AT KMBH" (my paraphrasing -- when he stated -- "Failure to Analyze Alternatives Objectively...")

The FEIS falls short of satisfying NEPAs mandate to analyze the impact of stationing alternatives for both equipment and troops. The fact that MCBH is the only infantry division that does not routinely train with rotary winged lift aircraft suggests a prior recognition of the facilities inadequacy to do so without adverse impact on the population living close by as well the environment.

Long-standing residents of Kaneohe testified at their distress with the noise generated by Harrier jets. They noted a significant improvement in her quality of life and these aircraft were no longer in use. Their current concern is predominantly the noise implications of the addition of rotary winged aircraft (MV 22) and also the larger jet engine replacement for the P3 (P8). An additional expressed concern was the safety record of the MV 22 with multiple crashes reported. This aircraft would be flying over homes and the bay with many recreational boaters. It is still unclear whether the additional troop and equipment placement at Kaneohe is a military or political consideration. There is no apparent analysis suggesting the military imperative for placement of this additional personnel and equipment at MCB Hawaii versus other potential locations (e.g. mainland, Guam etc.). This suggests the decision may have been more political rather than military."

I hope that you have read this far and will consider all of the concerns mentioned. If any kbresidents know and would forward all ofr parts of this email to the appropriate Navy and/or Marine Corp offices -- it would be helpful. Or send me the email address.

H Huyler, Kailua Hawaii

>



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**  
**75 Hawthorne Street**  
**San Francisco, CA 94105-3901**

July 16, 2012

Naval Facilities Engineering Command, Pacific Division  
Attention: EV21, MV-22/H-1 EIS Project Manager  
258 Makalapa Drive, Suite 100  
Pearl Harbor, HI 96860-3134

**Subject: Final Environmental Impact Statement for the Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii, (CEQ # 20120180)**

The U.S. Environmental Protection Agency (EPA) is providing comments on the Final Environmental Impact Statement (FEIS) for the Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

EPA reviewed the Draft Environmental Impact Statement (DEIS) for Basing of MV-22 and H-1 Aircraft in Support of III MEF Elements in Hawaii and provided comments on December 22, 2011. We rated the document EC-2, Environmental Concerns – Insufficient Information based on our concerns about greenhouse gas emissions, water resources, air quality, noise and solid waste.

We appreciate the changes made in the FEIS that are responsive to our comments, such as: the discussion of net-zero energy use for new buildings; the estimation of construction and non-aircraft operational pollutant emissions, including greenhouse gas emissions; the expected 75% recycle/salvage rate for construction and demolition waste, based on the preliminary design; and a commitment to implement Low Impact Design elements discussed in the DEIS. We were also pleased to learn that Marine Corps Base Hawaii Kaneohe Bay “is a candidate for becoming a net-zero base (producing more energy than it consumes)” (p. 5-22).

Since receiving the FEIS, EPA has received a number of letters and email messages from community members, expressing concerns about the noise impacts of the proposed action. We also noted the large number of noise comments in the FEIS. We recognize that the residential noise exposure is projected to be below the 65 Day-Night Average Sound Level threshold, which is widely considered compatible with residential use. We appreciate the consideration of a lower screening level (60 dB school-day equivalent sound level) for school noise exposure. We encourage MCB Hawaii Kaneohe Bay to use the noise concerns as a starting point to further engage the community. We recommend consideration of noise monitoring to validate the accuracy of baseline modeling, operational and physical measures that could be incorporated at the base to further reduce noise, and possible attenuation measures for residents and other affected organizations.

We appreciate the opportunity to review this FEIS. We encourage the Navy to discuss goals for energy conservation and generation, water conservation, and waste diversion in its Record of Decision, and, where appropriate, to commit to implementing these through contract construction specifications.

When the Record of Decision has been signed, please send one hard copy and one electronic copy to the address above (mail code: CED-2). If you have questions, please contact me at (415) 972-3521 or Tom Kelly of my staff at [kelly.thomasp@epa.gov](mailto:kelly.thomasp@epa.gov) or (415) 972-3856.

Sincerely,



Kathleen Martyn Goforth, Manager  
Environmental Review Office (CED-2)

cc: Colonel Brian P. Annichiarico, Marine Corps Base Hawaii

D. Hunter Beyer  
P.O.B. 374  
Volcano, Hawai'i 96785

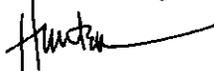
Attn: EV21, MV-22/H-1 EIS Project Manager  
Naval Facilities Engineering Command, Pacific  
258 Makalapa Drive, Suite 100  
Pearl Harbor, Hawai'i 96860-334  
June 18, 2012

Dear One,

Regarding the military's "routine flight operations" & "special training exercises" in Kohala,  
the MV Osprey.  
the Depleted uranium.  
the Noise levels.  
the Flight paths.

No, no, no, no & no!  
We don't want more military here.  
Anywhere!

Thank you,  
D. Hunter Beyer, citizen



**From:** [Bianca Isaki](#)  
**To:** [mv22h1eis;](#)  
**Subject:** Attn: EV21, MV-22/H-1 EIS Project Manager  
**Date:** Monday, June 11, 2012 7:50:07 PM

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To whom it may concern,

I'm interested in commenting on the MV-22/H-1 EIS, but I understand that the EIS process has progressed to the Final EIS "waiting period." Of what significance is it to have my comments on the "record" at this point in the process?

Thank you for any assistance with my inquiry.

Sincerely,  
Bianca Isaki

----- Forwarded message -----

**From:** **Tuiolosega, Herman** <[Herman.Tuiolosega@doh.hawaii.gov](mailto:Herman.Tuiolosega@doh.hawaii.gov)>  
**Date:** Fri, Jun 8, 2012 at 9:19 AM  
**Subject:** FW: 2012-06-08 Environmental Notice  
**To:**

[The Environmental Notice](#) for June 8, 2012 is now available online. I'm also attaching the pdf.

Herman Tuiolosega

Planner

235 S. Beretania St.

Honolulu, HI 96813

Ph. [\(808\) 586-4185](tel:(808)586-4185)

Fax [\(808\) 586-4186](tel:(808)586-4186)

<http://hawaii.gov/health/environmental/oeqc/index.html/>

NOTE: The OEQC is not authorized to determine or enforce compliance with HRS Chapter 343, nor does it have legal authority to approve or disapprove exemptions, EA's or EIS documents. The OEQC policy on such requests is to consult and offer general guidance based on our understanding of HRS Chapter 343 and past practice with regards to its implementation, but to refrain from issuing specific opinions on specific projects, except that the OEQC may make a recommendation as to the acceptability of a final statement upon request. Not only does the OEQC not have the legal authority to direct compliance or make determinations, the office also lacks the resources to effectively analyze specific projects, conduct site visits and in general conduct the due diligence needed to properly evaluate a projects impacts and potential Chapter 343 compliance issues. The responsibility for such analysis and determinations rests solely on the permitting and approving or accepting agency.

<<2012-06-08 Environmental Notice.pdf>>

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Bianca Isaki, Ph.D.  
William S. Richardson School of Law, J.D. 2013  
The University of Hawai`i at Manoa  
2515 Dole Street  
Honolulu, HI 96822-2350  
mobile [808.927.5606](tel:808.927.5606)

--

Bianca Isaki, Ph.D.  
William S. Richardson School of Law, J.D. 2013  
The University of Hawai`i at Manoa  
2515 Dole Street  
Honolulu, HI 96822-2350  
mobile 808.927.5606

**From:** [James W. Macey](#)  
**To:** [mv22h1eis;](#)  
**Subject:** Attn: EV21, MV-22/H-1 EIS Project Manager  
**Date:** Wednesday, June 13, 2012 3:20:37 PM

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Enough military already in Hawaii! I am retired military and there is way too many military here now to justify spending anymore tax dollars for more. The islands have enough people already and we definitely do not need any more. Send them to Camp Pendleton. There is plenty of room there. We do not need the traffic or noise these tax burdens will bring. And why do we need them here? What justification in god's name is there to put these Marines here? Enough already!

**From:** [Jonathan Gillentine](#)  
**To:** [mv22h1eis](#);  
**Subject:** comment on plans to base helicopter squadrons at MCBH  
**Date:** Wednesday, June 13, 2012 9:10:36 AM

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I have serious concerns about plans to add helicopters to our busy Kaneohe skies. I believe the added noise and air traffic will reduce the serene quality of life here on the Windward side. I also think this change will reduce property values for our area. We already have to endure the frequent noise brought by training take-offs and landings of large cargo planes, sometimes well into the evening. The noise is excessive and it is alarming to see a large plane headed directly toward my home. I already call the community affairs office, but I don't feel that my calls are taken seriously. I once called about a plane flying over my house, coming in from the south at a very low altitude. The individual I spoke to said it was a Russian plane and that the pilot didn't know the proper flight path. Other than that he wasn't much help, insisting that the plane was at an appropriate altitude. His attitude was patronizing and dismissive.

There is an additional concern of safety. In recent years, there have been helicopter crashes in Kaneohe Bay and off of Kailua Beach. Are there any guarantees that such a tragedy won't occur within Kaneohe residential areas closest to the bay?

While I understand this opportunity to comment is only in relation to the environmental impact statement, I also see a bigger picture. The newspaper stated that there isn't sufficient space at the base for these additional aircraft. Considering that housing, schools and other infrastructures will be needed, it simply doesn't make sense to add these squadrons. As a teacher, I am aware of the large student population at Mokapu Elementary School. Who will pay for building more classrooms (or an additional school) for the families who arrive with the personnel who fly and service these helicopters? There are too many unknowns at this point. I think other sites should be considered for these additional aircraft.

Jonathan Gillentine  
46-217 Koaena Pl.  
Kaneohe, HI 96744  
No to mailing list

**From:** [Larry Stubblefield](#)  
**To:** [mv22h1eis;](#)  
**Subject:** Comments - EIS for the Basing of MV-22 and H-1 Aircraft in Support of III Marine Expeditionary Force Elements in Hawaii  
**Date:** Tuesday, June 12, 2012 10:05:11 AM

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Please complete the following information: Name: Company/  
Organization: Mailing Address: City: State: Zip Code: Add to Mailing  
List? (Yes or No): Comments:

Larry Stubblefield

1022 Mokapu Blvd

Kailua, Hawaii 96734

(no need to add to mailing list)

My comment: I, as a life long resident of Kailua, support the Marines in their plan to base certain aircraft and support at KMBH. Noise from the Base is a part of Windward Oahu life. Noise during the Vietnam conflict was much worse, (F-4). We windward residents understood the need at that time.

Residents complaining about noise have no place as when someone purchases a home near the base or flight pattern they know full well, (noise and flight pattern must be revealed in DROA), of the noise factor. This is similar to someone purchasing a home on a busy street and then complaining about the traffic.

I believe the majority of Windward residents support our Marines and their base activities. We seem to have a very small minority in Kailua/Kaneohe who oppose anything and everything...helped along by the newspaper printing stories alluding to significant support for the opposition, when I believe they are in a very small minority.

Finally, the noise if bothersome, is not all day every day. Noise from aircraft

is momentary and clearly not enough to warrant cancelling the Marine/  
Navy plans.

Aloha,

Larry Stubblefield

**ExchangeDefender** Message Security: [Check Authenticity](#)

**From:** [Gary](#)  
**To:** [mv22h1eis;](#)  
**Subject:** MV-22/H-1  
**Date:** Tuesday, June 12, 2012 12:12:09 PM

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I'm 100% in support of the aircraft and personnel coming to Hawaii. The noise?  
That's the sound of freedom.

Gary Hashimoto

Sent from my iPhone

**From:** [Rita Kanui](#)  
**To:** [mv22h1eis;](#)  
**Subject:** My Testimony  
**Date:** Thursday, June 14, 2012 11:33:38 PM

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Aloha,

My name is Rita K. Kanui-Gill aka Kawehi Kanui...I am a Kanaka practitioner and ggggg grand daughter of High Priestess Luahine Ha'o genealogically linked to Kings and Queens of these islands. We are culturally involved with our natural beauty in Hawai'i given to us by 'Io, our God, since before you stepped on our shores...when my ancestors were care takers of these islands...I and my family are care takers today and I would like to enter into the record my mana'oi'o on this subject of the helicopters for RIMPAC and what it means to me.

Simply, ALOHA AND WAR cannot take up the same space, (Ko Hawai'i Pae Aina) as taught to me by my kupuna Kahuna High Priestess Luahine Ha'o, Konia and Bernice Pauahi Paki Bishop off springs of my tutu Kailipakalua as well as my grandmother Mae Kamaka Kamai Ai, aunties Peggy Ha'o Ross, Pilahi Paki and uncle Tom Maunupau who are all gone now but lived before and after the illegal occupation by the US military in 1893...what you are doing is against our Treaty 1849 Art. I and all the laws of the Hawaiian Kingdom...historically you are an invader that should be told the truth if you don't already know.

My people are in prison because of your greed for WAR...over 6,000 men and women are locked up because you have tried to kill their ALOHA SPIRITS, so they rebel and we understand them fully and work toward getting them out of prison and into a Pu'uhonua on Bellows beach in my community, because they need it for their healing, training and work to take care of their families and to make a new and healthy lifestyle, not WAR.

ENOUGH already with the lies and falsehoods to mask who you really are as my aunt Sylvia said, you represent the double E's: Evil Empire and she is right when you really look closely at your attitude, tools of war and greed for other people's resources and value in our lands...in our waters around all of Hawai'i. Will your practice of WAR bring back our broken hearts? No.

ALOHA AND WAR CANNOT EXIST in the same space known as Ko Hawai'i Pae Aina...time to take your EIS plans to include ending this illegal

occupation of our islands...my tutus never said this, but I will because I know that you are not the only force that is in this world...there are other beings more powerful than you...so stop the charade and leave our aina, that is what I say to this EIS plan.

ALOHA AND WAR, cannot take up the same space and therefore we are against the RimPac training and their weapons of destruction that is not of ALOHA, but for killing and destroying man, land, animals and ocean animals that we eat from our refrigerator called the ocean. Anything that flies in our skies is an invasion of our airspace and peace and quiet therefore you need to put down in your records that Kanakas don't like anything about you or your weapons of destruction on our lands.

Our bills are mounting up because of The Rail and stealing of farm lands to build houses to make a profit for yourselves...it's disgusting because everything the US military does in Hawai'i is always one of "ownership" when you don't have the blood, genealogy, laws, culture, principles and values that knows ALOHA, only the Kanaka Hawai'i have that and we will keep it close to our hearts at all time and never let anyone abuse it again...go your own EIS way and know we are against all WARS and practicing WAR on sacred land is a crime.

ALOHA AND WAR, cannot take up the same space because it's culturally impossible on these beautiful islands...why do you think 'Io (God) put these islands in the middle of the ocean? To protect us from people and things like RimPac and foreigners whose life is built on GREED, CONTROL, WAR, KILLING and MAMING innocent men, women and children in other foreign countries? Why do you think that Kanaka people don't like the US? Because you have NO ALOHA or Spirit of Aloha...which is why we are against WARS...you only know how to use and abuse our natural resources so stop!

This EIS should take into consideration the fact that many people from Waimanalo never go to your "Makahiki?" because it's fake and without ALOHA although the Civic Clubs and Kamehameha Schools participated, our people will never participate with people who are ignorant puppets of the US military...we are not puppets, we are Kanaka Hawai'i and proud to practice our culture in our homes and at the beaches of Waimanalo...Civic

Clubs do not represent me or my 'ohana...neither doe Ryan Kalama, President of the Kailua Civic Clubs...he doesn't even know or understand the Treaties and Laws of the Hawaiian Kingdom but is used as a puppet for Inouye, Akaka, Abercrombie, and the DLNR... neither does Kamehameha schools...Bernice Pauahi Paki Bishop must be turning in her grave watching these "Native Hawaiians" abuse our aina trying to pull off a Makahiki and no one comes from the community except puppets... everything good about ALOHA and the ALOHA SPIRIT of these lands are ruined by the US military and you put fear into the hearts of people like Ryan, who is my cousin...and on top of that Waimanalo is the only Ahupua'a with it's own Mo'i, Windy Lorenzo how more cultural can you get? We still have our culture intact. SHAME on you! Our genealogy to these lands are well known in the Genealogy books written by Edith McKenzie...my tutu is High Priestess Luahine Ha'o who is mentioned in there as Bernice's grand mother...in reality Bernice is my dear cousin and Luahine's great grand daughter...so I know who I am and where I came from and know that this is why ALOHA cannot survive with WAR taking up space in Hawai'i when 'Io gave us a responsibility to ALOHA the AINA. Just because we don't go to your "Makahiki" does not mean we don't have our culture, it just means we aren't buying into your lies and fake appearances that are not even PONO.

ALOHA AND WAR, shall not take up the same space because it is hewa to our lands which is so precious to us to grow our food, our children and our businesses to stay honest and independent...not to mention keeping our people out of the CCA prisons in America. For us, WAR is never the solution to anything only ALOHA and LOVE is the answer to WAR...that is not AMERICA's right to take, take, take and take over and over again.

It's not only environmentally wrong, it is also morally wrong to bring your weapons of destruction to our islands and expect us to be with Aloha to welcome you, a'ole. It's time to stop the lies and give us back our lands...go home, you don't reflect ALOHA...infact, there is no such thing as EIS when you look at the destruction of just practicing WAR in our waters and airspace...according to Section 106, you are violating our rights as Kanaka Hawai'i by even asking us to fill up such a format. You never had our permission to come to these islands...you forced your way on to our Queen and arrested her illegally and act like it's okay...it's not okay, please stop your WAR practices and take your helicopters and fly it in America where

your home is, not in our home.

Let me remind you that since 1893 when the illegal US military occupation took place you have ruined our lands, water and food resources...now you want to destroy our culture and ocean? No...we do not support anything to do with WAR or the RIMPAC exercises or taking of lands for the Rail or Farm lands for housing developments. The US Military cannot take up the same space as ALOHA, you have to leave our space so we can live culturally happier lives in PEACE, not WAR.

I dedicate my testimony to 'Io, my ancestors, kupuna and 'ohana who knows the difference and supports that ALOHA and WAR cannot take up the same space (Hawai'i Ko Pae Aina). Stop your WAR training in our islands and please GET OUT.

Malama Pono,  
Kawehi Kanui