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

July 6, 2009

ATTN: Makua EIS Public Comments
USAG-HI Public Affairs Office
742 Santos Dumont Avenue, WAAF
Schofield Barracks, HI 96857

Subject: Final Environmental Impact Statement (FEIS) for Military Training Activities at Makua Military Reservation, Hawai'i (CEQ # 20080361)

Dear Public Affairs Office:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) 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) and Draft Supplemental Environmental Impact Statement (DSEIS) and provided comments to the Army on October 5, 2005 and November 6, 2008 respectively. We expressed concerns regarding the introduction of additional weapons-related contaminants to soil and water already contaminated by military activities, evidence of existing pollutant migration to groundwater and offsite, and the use of weapons that have a high potential to cause wildfires, increasing erosion and contaminant migration potential. Based on our review of the Final Environmental Impact Statement (FEIS), we continue to have concerns regarding the above, especially contamination of soil and water resources.

Based on the studies associated with the FEIS, there are indications that weapons-related contaminants are entering water resources and migrating off-site (Appendix G-1, G-8). The Marine Resources Study concluded that marine resources relied upon by area residents for subsistence are being contaminated by substances associated with Army training at the Makua Military Reservation (MMR) (p. 3-102), and there is a small increase in cancer risk to people who consume fish and shellfish collected from Muliwai or nearshore locations adjacent to MMR (p. 3-98).

In our comments on the DSEIS, we noted that the Pohakuloa Training Area (PTA) on Hawaii (Alternative 4) appeared to offer an alternative site that would result in fewer environmental impacts than at MMR. We continue to recommend consideration of the PTA site. If MMR is selected as the training site, we recommend the Army proceed in a manner that slows or offsets the incremental contamination of soil and water resources. Selection of Alternative 1 –

reduced capacity use of MMR – would slow chemical loading at the site while meeting the stated training need.

Regardless of the alternative selected, we continue to recommend the Army commit to prompt removal of soils at MMR that contain increased levels of contamination ("hotspots") to reduce potential for further pollutant migration. The Army identified remedial action at the open burn/open detonation (OB/OD) area as potential mitigation for chemical contamination of water resources in the FEIS. We strongly recommend that this remedial action occur, and that a commitment to this remediation be included in the Record of Decision (ROD). Remedial actions at other sites contaminated from training are not identified as potential mitigation, however. We continue to recommend the removal of hotspots in all areas where contaminants exceed Preliminary Remediation Goals (PRGs), with priority for those areas that exceed industrial PRGs, including Objective Elk and the Makua Stream Firing Area.

The FEIS states that the Army will develop a long-term monitoring program to monitor impacts on water quality from contamination, and we support this effort. We also recommend that range cleanup after all training events be increased, commensurate with increases in munitions usage. This is consistent with the Department of Defense's pollution prevention policy and the *Prevention of Lead Migration and Erosion from Small Arms Ranges* manual[1].

Regarding wildfire risk, we recommend including in the ROD all mitigation measures identified in the FEIS, including additional mitigation 1 and 2 on pp. 4-249 through 4-250.

We appreciate the opportunity to comment on the FEIS. EPA continues to encourage the Army to take a long-term stewardship approach to site management at MMR to reduce future cleanup costs, improve water quality, and benefit the residents of Hawaii. We would appreciate receiving a copy of the ROD, when it becomes available, at the above address, mail code: CED-2. If you have any questions, please contact me at 415-972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

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

[1] 1998. US Army Environmental Center (USAEC) Range XXI Team and the Army Training Support Center (ATSC). Referenced on p. 3-352 of the FEIS.