

SaveEwaShoreline



Ewa Beach, HI 96706

SaveEwaShoreline@gmail.com

+@SaveEwaShoreli1

808 339-6129

Statement Before The
**SENATE COMMITTEE ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY
AFFAIRS**

Tuesday, March 23, 2021

1:10 PM

Via Video Conference

In consideration of

SCR48

**REQUESTING THE UNITED STATES MARINE CORPS TO COMPLETE AN
ENVIRONMENTAL IMPACT STATEMENT FOR THE SHORELINE STABILIZATION
PROJECT AT THE PUULOA RANGE TRAINING FACILITY.**

Chair NISHIHARA, Vice Chair ENGLISH, and Members of the SENATE COMMITTEE
ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY AFFAIRS

SaveEwaShoreline provides written comments **IN SUPPORT OF SCR48**, which requests The United States Marine Corps complete an Environmental Impact Statement (EIS) for the Shoreline Stabilization Project at the Pu'uloa Range Training Facility (PRTF) in Ewa Beach, Hawaii.

SaveEwaShoreline is a non-partisan, grassroots organization of concerned citizens dedicated to the preservation of the Pu'uloa shoreline in Ewa Beach, HI.

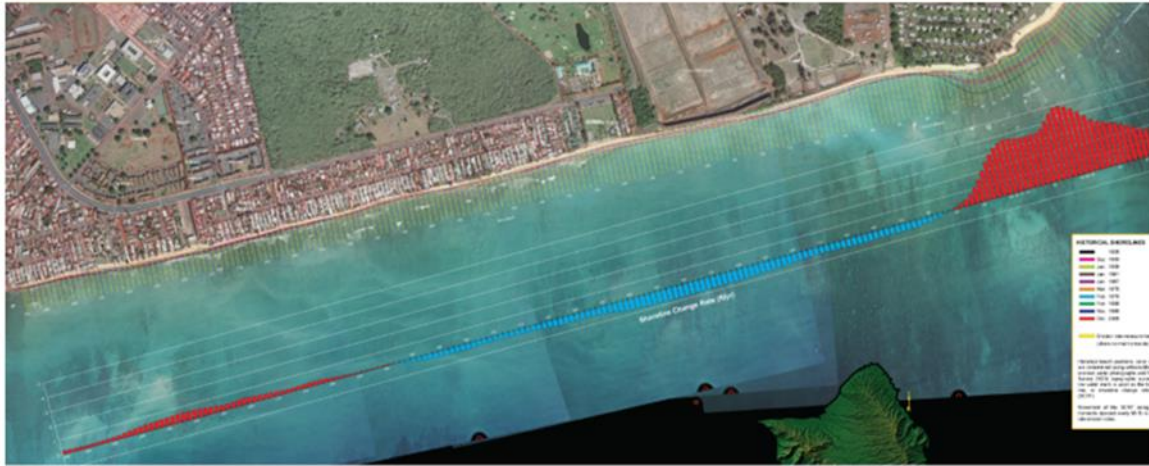
Shoreline hardening exacerbates the impact of sea level rise and accelerates the destruction of shorelines. The Shoreline Stabilization Project at PRTF involves impact pile driving sheet pile deep into the shoreline substrate creating a shoreline-hardening structure just landward of the high-water mark and spanning from 1500' to 2500' along the Pu'uloa shoreline.

According to the 2015 Pu'uloa Shoreline Erosion Study, structures such as the planned sheet pile bulkhead are designed to protect that which is landward of the bulkhead, do nothing to prevent erosion, and contribute to the "likely loss of the sand beach." The study did not recommend the option of constructing a sheet pile bulkhead.

Disregarding the recommendation of the 2015 Pu'uloa Shoreline Erosion study, MCBH moved forward with an Environmental Assessment (EA) in pursuit of their preferred alternative which includes construction of a steel sheet pile bulkhead. Despite warnings that the sheet pile plan would result in loss of the sand beach, and ample evidence on their own beach that hardening the Pu'uloa shoreline indeed results in increased erosion west of shoreline armoring structures, MCBH inexplicably concluded the project would not have the potential for significant impact and released a Finding of No Significant Impact (FONSI)

We disagree with the FONSI due to glaring omissions and inaccuracy of crucial data which factor into the findings. We believe the PRTF Shoreline Stabilization Project has the potential for significant impact to the PRTF shoreline, adjacent public shoreline, and private property, and warrants further evaluation via an EIS.

The USMC claims that significant coastal erosion has occurred over many years at PRTF. This is false. The claim is refuted by an 80-year erosion study by The University of Hawaii Coastal Geology Group which can be viewed on their website. <http://www.soest.hawaii.edu/coasts/erosion/oahu/>



1928-2005:

VERY STABLE EWA SHORELINE

NET ACCRETION FOR ALL OF PRTF SHORELINE

Source: UH SOEST
Coastal Erosion Website

The image above shows long-term stability of the Pu'uloa shoreline with net accretion for the entire PRTF shoreline. It also depicts the significant erosion of Keahi Pt at Kapilina, which was addressed with the 2012/2013 Iroquois Point Beach Nourishment and Stabilization which involved construction of 9 T-groins shown below.



The 2012 EA for the Iroquois Point T-Groin project states: “the shoreline to the west of Keahi Point has been relatively stable with alternating periods of erosion and accretion.”

The Iroquois Point EA predicted the project would not impact the stable PRTF shoreline and predicted continued stability west of the project. This forecast was predicated on the EA's determination that the "predominant" near shore sediment transport is west to east. That is only true in the summer months.

The summer season on the south shore of Oahu is exposed to southwest long period wave activity which generally produces west to east near shore sand transport. However, in the winter, absent of any southern long period wave energy, the predominant Pu'uloa near shore current is driven by the prevailing tradewind energy, and any shoreline hardened areas experience the predictable downflow erosion west of armoring structures.

It follows that the shoreline immediately leeward of a series of T-groins would experience significant erosion during periods of sustained winter tradewind energy. This phenomenon has been noted and significant erosion events impacting PRTF west of the Iroquois Point T-groins are now common. The shoreline west of the T-groins has become significantly unstable as evidenced by wide fluctuations of accretion (generally summer) and erosion (generally winter).

The PRTF Shoreline Stabilization EA states that in about 2014: "increasing erosion led to a steepening of the slope and undermining of approximately 90% of the vegetation." The limited beach monitoring data published in the PRTF Shoreline Stabilization EA also reflects shoreline instability west of Keahi Point in years following Iroquois Point T-groin construction.

A separate, 5-year periodic MCBH [Range Environmental Vulnerability Assessment \(REVA\)](#) published in December of 2014 called attention to: "significant damage to the backside of the impact berm at Foxtrot Range in the form of substantial erosion." The report noted "severe tidal shifts" over the 18-month period preceding the report, which coincides with construction of the Iroquois Point T-groins. This information was omitted from the PRTF Shoreline Stabilization EA.

The images below illustrate the significant impact to the formerly stable shoreline west of Keahi Point and the eastern portion of PRTF. Some are fall photos following a summer of southern wave activity, resulting in season-long accretion immediately west of the T-groins at Iroquois Point. Comparison photos taken in January 2020 and early 2021 show the wintertime erosion downflow and west of the T-groins after several weeks of sustained, strong tradewind energy.

Fall 2019



1/28/20



Fall 2019



1/28/20



*Note the tiki cabana under the red arrow.

February 2021



March 2021



Fall 2019



1/28/20



This clearly destructive erosion west of Iroquois Point can be expected to occur west of PRTF in the wintertime once the steel sheet pile becomes exposed, which MCBH acknowledges will “undoubtedly” occur.

The PRTF Shoreline Stabilization EA borrows sand migration data from the Iroquois Point T-groin EA and therefore makes the same flawed prediction that there would be no impact west of the PRTF project because of the claimed “predominant” west to east current.

The Iroquois Point shoreline has a different shape, geographic alignment, connects to the Pearl Harbor channel, and has a historically completely different long-term erosion trend than PRTF. PRTF historically accretes sand whereas Iroquois Point shoreline historically erodes, severely in places. It is non-sensical to use the outdated data from the Iroquois Point project for analysis of PRTF, especially given the inaccurate prediction that the Iroquois Point EA produced with respect to erosion west of the project.

The elusive 2015 Pu’uloa Erosion Study did evaluate a single wave energy scenario. The study modeled a typical, moderate summer southwest swell event which produces west to east sand migration. But again, that scenario does nothing to predict the likely wintertime impact of the sheet pile structure on the shoreline fronting Pu’uloa Beach Park and private homes, immediately west of the PRTF project.

Given the mis-forecasted, significant impact on the shoreline west of the Iroquois Point shoreline hardening project, it is preposterous to conclude there is no potential for significant impact to the west of the PRTF project, supporting the prediction with the same data that was wrong the first time around.

The USMC must also re-evaluate their Essential Fish Habitat (EFH) and benthic data. The MCBH claim of “no live fish or coral” in seeking NOAA concurrence with their evaluation of potential impact is false. The restricted nature of the area has likely contributed to what is a well-known, thriving live coral ecosystem according to local marine biologists, anglers, divers, and the Allen Coral Atlas.

The only near shore live coral along the entire Pu’uloa shoreline is directly fronting the planned sheet pile bulkhead site. The Allen Coral Atlas 2020 illustrates this confirmation of countless anecdotal reports by local Kupuna of a

thriving reef at PRTF:



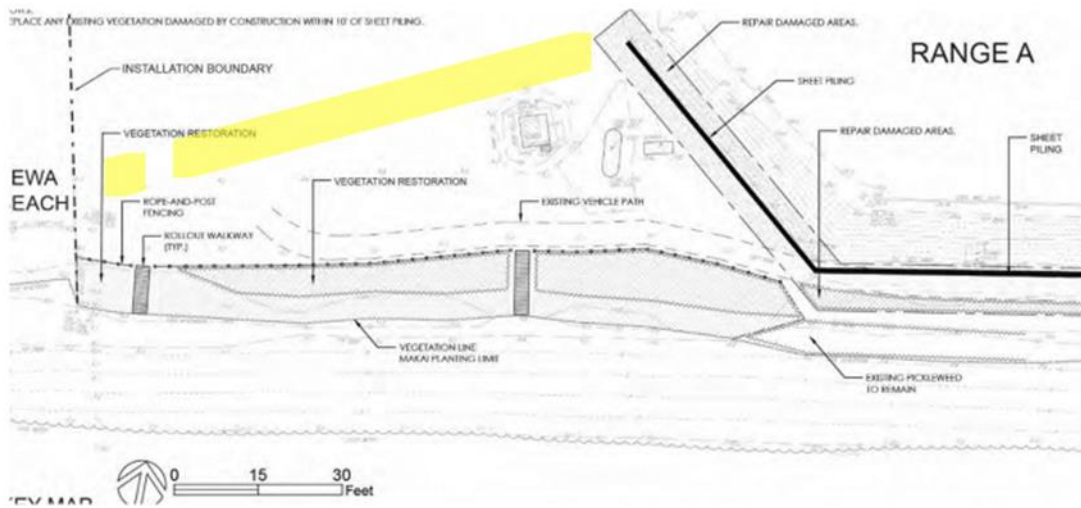
ALLEN CORAL ATLAS

<https://allencoralatlas.org/atlas/#14.00/21.3061/-157.9821>

The PRTF Shoreline Stabilization project EA fails to acknowledge the Ewa Limu Management Area which borders the waters makai of PRTF. There was no attempt to evaluate the project's potential impact on limu and associated indigenous subsistence gathering, cultural practices, or religious rites involving limu. An EIS would provide MCBH an opportunity to correct this glaring omission.

The prominent WWII era historic structure, eligible for listing in the National Register of Historic Places addressed in SCR48 is known by some as "The Old Pistol Range" and is pictured below. It is omitted from the PRTF Shoreline Stabilization project EA, section 106 evaluation and is not accounted for anywhere else in the PRTF EA. This 165' long, 10' high, concrete structure will effectively lengthen the wall and angle it back toward the shoreline to within 15 yards of the nearest home. It negates the claimed 230' "buffer zone" between the sheet pile

bulkhead and the nearest residence.



NO REFERENCE TO OLD PISTOL RANGE OR BUNKER.



The wave energy reverberation that will rapidly follow wave interaction with the southwest corner of the main sheet pile structure will likely cause erosion into the angled area formed by The Old Pistol Range and terminus of the sheet pile bulkhead. This will accelerate loss of the Popoi Place homes, with the Pu'uloa Beach Park facilities and pavilion soon to follow.

SaveEwaShoreline volunteers visited the beaches on the Pu'uloa/Oneula shoreline and collected signatures in person and also online at change.org. Currently, over 1920 concerned beachgoers have signed this petition requesting an EIS be conducted for this project. The online version is linked below:

<http://chnng.it/DQtZ8Txd>

The steel sheet pile project is an irreversible alteration to our shared shoreline. If the project moves forward and erosion patterns similar to those caused by the Iroquois Point T-groins occur, it won't just be piles of dirt and lead that will be destroyed. It will be real people losing their homes along with the sandy beach

where our keiki play at Pu'uloa Beach Park. What recourse will the community have at that point? The stakes are too high to rely on a study that ignores the science of the Pu'uloa seasonally variable shoreline process, the existence of a healthy coral reef ecosystem, a limu protected area, prominent structures of historical significance, etc.

Our fine Marines built those berms too close to the shoreline. The berms need to be moved back—all of them. The obvious alternative of retreating all the ranges was not carried forward for evaluation in the Pu'uloa Shoreline Stabilization EA. A rigorous evaluation of that most obvious alternative must be conducted in an EIS.

Better still, we should build our Marines a state-of-the art, enclosed shooting range/warfighting simulator higher and further away from the shoreline. This would solve PRTF's problems of not only erosion, but also noise, Target Danger Zone (TDZ) safety, and off-range migration of Munitions Constituents (MC). Rooftop solar panels could generate all the power needed for A/C, ventilation, lighting, etc. Creative minds can solve MCBH's problems without destroying our precious shoreline. Let's start with a comprehensive EIS.

Please pass SCR48 as a first step in mitigating certain destruction of the Pu'uloa shoreline.

Michael Plowman

SaveEwaShoreline



UNITED STATES MARINE CORPS
MARINE CORPS BASE HAWAII
BOX 63002
KANEHOHE BAY HAWAII 96863-3002

IN REPLY REFER TO:

5720/1

S-5

March 22, 2021

Senator Clarence K. Nishihara
Chair, Public Safety, Intergovernmental, and Military Affairs
Senate District 17
Hawaii State Capitol
Honolulu, HI 96813

Dear Senator Nishihara:

SUBJECT: TESTIMONY FOR HOUSE CONCURRENCE RESOLUTION 75 AND SENATE
RESOLUTION 48

Marine Corps Base Hawaii is submitting the enclosed documents as testimony to correct misinformation within HCR75 and SCR48 regarding the Environmental Impact Statement request for Puuloa Range Training Facility (PRTF).

Enclosed are correspondence between the Surfrider Foundation and the Marine Corps Deputy Commandant for Installations and Logistics, and a press release updating external stakeholders on the status of the proposed action at PRTF.

Sincerely,

A handwritten signature in black ink, appearing to read "S. C. Koumparakis", written over a horizontal line.

S. C. KOUMPARAKIS
Colonel, U.S. Marine Corps
Commanding Officer
Marine Corps Base Hawaii

Enclosure: 1. Shoreline Stabilization at PRTF Press Release
2. Surfrider Foundation Response Letter from HQMC

Copy to: S-4, MCBH
S-5, MCBH
ECPD



MCBH PRESS RELEASE

COMMSTRAT, Marine Corps Base Hawaii

Point of contact: Capt Eric Abrams

Email: eric.abrams@usmc.mil

Office Phone: (808) 257-1364

MCBH Website: www.mcbhawaii.marines.mil

MCBH Facebook: www.facebook.com/MarineCorpsBaseHawaii

Mar. 10, 2021

Shoreline Stabilization at PRTF

MARINE CORPS BASE HAWAII – Marine Corps Base Hawaii is balancing diligent stewardship of the environment on Oahu while maintaining an effective Marine Corps training area at Pu’uloa Range Training Facility (PRTF). Given the significant coastal erosion along the shoreline, MCBH is exploring multiple stabilization options to ensure PRTF continues to operate as a vitally important piece to Marine Corps readiness in the Pacific.

As required under the National Environmental Policy Act (NEPA), MCBH contracted Naval Facilities Engineering Command to conduct an Environmental Assessment (EA) in 2013, to understand the effects of a proposed shoreline stabilization project at PRTF. This assessment was conducted in accordance with all applicable policies and laws required by NEPA, ensuring the proposed federal action considered impacts to human health and the environment. Multiple alternatives were considered and analyzed throughout the course of the EA.

The results of the EA produced a course of action known as the “preferred alternative.” MCBH intends to implement the proposed action in three phases. In the first phase, MCBH initiates projects to revegetate available fast land areas fronting all ranges, to naturally slow the erosion. In the second phase, MCBH moves the short-distance ranges (C-F) back from the shoreline, to further protect the impact berms from erosion and ensure the ability of Marines to continue training on the range. The managed retreat of ranges C-F would create a larger buffer area between the short-distance ranges and the ocean. MCBH is not programed or budgeted for the third phase at this time, but will closely monitor the rate of erosion following the first two phases. The proposed third phase consists of a sheet pile structure 1500’ long, and buried up to 20’ deep, above the high water mark in front of ranges A-B. Depending on when

the third phase is pursued, additional NEPA analysis may be required. Additional details are available on the MCBH website. The EA analysis resulted in a Finding of No Significant Impact (FONSI) to the environment across all phases.

It is important to note that in the performance of the analysis, MCBH consulted with all necessary regulatory agencies to include the U.S. Fish and Wildlife Service, the National Oceanographic and Atmospheric Administration and the State Historic Preservation Division. MCBH considered cultural, historic and natural resources to include monk seals, sea turtles and essential fish habitat as part of the EA, and coastal impacts were submitted to the State's Coastal Zone Management Program. Public involvement was pursued through the Honolulu Star Advertiser in Aug 2019. MCBH took additional steps to consider public concern over the proposed action by delaying the release of the FONSI until further coordination was completed with the Hawaii Federal Delegation. Following an on-site engagement and correspondence with the delegation, the FONSI was released via the HSA and the Office of Environmental Quality and Control's *The Environmental Notice* in Mar 2020.

MCBH remains committed to absolute transparency in the shoreline stabilization process and continues to work with the local community, non-governmental organizations and elected officials to address concerns and clarify misinformation. MCBH recently conducted a tour of PRTF with Representative Matthew LoPresti and the Surfrider Foundation Oahu on March 3, 2021 to accomplish these objectives. To learn more about the proposed shoreline protection EA please read the entirety of the report and FONSI, available on MCBH's webpage at: <https://www.mcbhawaii.marines.mil/>

Imagery from MCBH's engagement with Re LoPresti and the Surfrider Foundation Oahu:

<https://www.dvidshub.net/image/6542922/state-rep-matthew-lopresti-surfriders-oahu-visit-prtf>

<https://www.dvidshub.net/image/6543060/state-rep-matthew-lopresti-surfriders-oahu-visit-prtf>



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
3000 MARINE CORPS PENTAGON
WASHINGTON DC 20350-3000

IN REPLY REFER TO:

5090

LF

26 AUG 2020

Ms. Doorae Shin
Oahu Chapter Coordinator

Mr. Ray Aivazian
Oahu Chapter Chair
Surfrider Foundation
P.O. Box 283092
Honolulu, HI 96828

Dear Ms. Shin and Mr. Aivazian:

Thank you for your June 14, 2020 letter concerning Marine Corps Base (MCB) Hawaii's proposal to stabilize the shoreline at the Pu'uoloa Range Training Facility (PRTF) on Oahu. I am responding on behalf of the Secretary of the Navy.

The Marine Corps shares the Surfrider Foundation's goal of long-term sustainability of coastal and marine resources. We recognize that protecting natural and cultural resources is an important part of our responsibilities and ensures mission readiness by enabling the Marine Corps to conduct realistic training now and into the future.

The 165 acre PRTF has been in continual use as a range facility since 1915. It is a mission critical resource for the Marine Corps, as it is the only existing range that can provide this training capability on Oahu. Significant coastal erosion has occurred over many years at PRTF, and is it expected to worsen with the impacts of sea level rise. If left unaddressed, these impacts will result in degradation of the range, loss of its critical mission capability, and disturbances to precious natural resources. In 2015, a MCB Hawaii Pu'uoloa Shoreline Erosion Study assessed shoreline erosion and recommended solutions. The results of the study were used to develop a Proposed Action and potential alternatives to correct PRTF's erosion issues in an August 2019 Environmental Assessment (EA) under the National Environmental Policy Act (NEPA). The EA evaluated alternatives that incorporated the U.S. Army Corps of Engineers' Engineering with Nature Initiative using Natural and Nature Based Features (NNBF). This included both structural and non-structural measures to sustainably address the significant coastal erosion that has occurred over many years. As part of the EA process, MCB Hawaii consulted with relevant federal and state agencies including the U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration, Hawaii Office of Planning, and the Hawaii Historic Preservation Division. The public was notified and the EA was available for public comment. The EA and associated documents are posted on the MCB Hawaii website at:
<https://www.mcbhawaii.marines.mil/Resources/Featured-Information/Puuloa-Shoreline/>.

The EA evaluated a combination of measures to mitigate coastal erosion. This included the Preferred Alternative of moving the short-distance ranges (Ranges C-F) back from the shoreline, revegetation of available fast land areas fronting all ranges as feasible, and installing approximately 1,500 feet of sheet pile, buried to about 12 inches above the ground along the fast

land boundary of the long-distance ranges (Ranges A and B). Based on the EA analysis, no significant impacts requiring the preparation of an Environmental Impact Statement (EIS) were identified, and a Finding of No Significant Impact (FONSI) was signed on November 14, 2019.

The EA properly identified all potential environmental impacts and mitigation measures. The Proposed Action/Preferred Alternative will be implemented in phases. In the first phase dependent upon available funding, MCB Hawaii will implement projects to revegetate available fast land areas fronting all ranges, while continuing to monitor shoreline erosion. In the second phase, MCB Hawaii will move the short-distance ranges (Ranges C-F) back from the shoreline including installation of backstop berms, structures, and utilities as necessary. MCB Hawaii is not programming or budgeting for the third phase sheet pile structures at this time, as we monitor erosion following implementation of the first two phases. MCB Hawaii will continue to monitor the conditions throughout implementation in the event there are substantial new circumstances or information relevant to environmental concerns that bear on the proposed action or its impacts.

The attached document provides additional information on issues raised in your letter. MCB Hawaii will continue to engage with the community and other stakeholders as the project proceeds. Thank you for your interest in this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. G. Chiarotti', with a long horizontal stroke extending to the right.

C. G. CHIAROTTI
Deputy Commandant
Installations and Logistics

Copy to:
Senator Brian Schatz
Senator Mazie Hirono
Congressman Ed Case
Samuel J. Lemmo, Hawa i'i , DLNR
John Nakagawa, Hawaii CZMA Program
Joshua W. Stanbro, City and County of Honolulu

**MARINE CORPS BASE (MCB) HAWAII ENVIRONMENTAL ASSESSMENT (EA) FOR
SHORELINE STABILIZATION AT PU'ULOA RANGE TRAINING FACILITY**

1. Natural and Nature Based Features (NNBF). The Marine Corps evaluated alternatives that incorporated the U.S. Army Corps of Engineers' Engineering with Nature Initiative using Natural and Nature Based Features (NNBF). This included both structural and non-structural measures as an integrated approach to meet the purpose and need of the proposed action. The preferred alternative includes NNBF in the form of vegetation restoration and landscape repair. Other alternatives considered also included NNBF, such as beach nourishment with or without stabilizing structures; sand stabilizing structures (groins, breakwaters); and other measures (vegetation, sand bags/tubes, and concrete or rock mattresses), either alone or with shoreline hardening (revetments, seawalls, and sheet pile bulkheads). Some alternatives were not carried forward for analysis in the EA because they did not satisfy screening criteria that included a near-term development timeframe, minimal operational disruptions, and stabilization effectiveness.

2. Marine Resources and Impacts to Groundwater/Ocean Exchange. On April 1, 2019, the Marine Corps opened consultations with the National Oceanic and Atmospheric Administration's National Marine Fisheries Service (NMFS) in regards to the EA and submitted a Biological Evaluation containing an analysis of potential impacts to Endangered Species Act-listed species, critical habitat and Essential Fish Habitat (EFH). NMFS requested additional information on April 8, 2019. The Marine Corps provided a response on April 23, 2019 which addressed liquefaction and groundwater impacts and noted that geotechnical investigations will be conducted prior to placement of sheet pile, at an undetermined date in the future to further investigate site-specific engineering considerations. Determinations regarding site suitability in relation to groundwater or other engineering concerns would be made at the time when these investigations occur. On April 25, 2019, NMFS provided two conservation recommendations under the EFH provisions under Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) to help ensure that potential adverse effects are avoided or minimized. On May 30, 2019, the Marine Corps acknowledged and responded to the two conservation recommendations. In its letter the Marine Corps stated "Geotechnical investigations will evaluate site suitability for pre-drilling and vibratory versus impact hammer methods. Pre-drilling sheet piles, and the use of vibratory versus impact hammering methods will be considered." The Marine Corps also provided a Draft EFH Monitoring plan in the response.

3. Cultural Resources. MCB Hawaii consulted with The Temple of Lono and Office of Hawaiian Affairs (OHA) under Section 106 of the National Historic Preservation Act. MCB Hawaii initiated Section 106 consultation on 20 April 2016 and then again on May 30, 2017. Both consultation letters were sent to the State Historic Preservation Office (SHPO), the OHA, the Temple of Lono, and the Historic Hawaii Foundation. SHPO concurred with MCB Hawaii's determination of no historic properties affected on June 3, 2016 and June 30, 2017. These consultations letters can be found in Appendix B of the EA (<https://www.mcbhawaii.marines.mil/Resources/Featured-Information/Puuloa-Shoreline/>).

4. Hazardous Materials. The primary hazardous material to be found at PRTF is lead in the form of small arms ammunition projectiles (i.e., bullets). Lead bullets accumulate in the earthen berm at PRTF. Due to the presence of sand dunes and reinforcement structures, the berms are not at risk from coastal erosion under normal tidal conditions. The Marine Corps Range Environmental Vulnerability

Assessment (REVA) program assesses the potential for munitions constituents (in this case, lead) to migrate off the range and cause a threat to human health and the environment. Previous REVA assessments have determined that the pathway is incomplete for lead to migrate from within the firing ranges to the nearby waters. Also, the lead bullets are removed from PRTF range impact berms every 3-5 years, depending on usage and loading, further reducing risk of contamination from lead migration and leaching caused by coastal erosion. Spent lead bullets are collected and disposed of in compliance with applicable regulatory requirements. See Table 3-8 of the EA, "Conduct a Phase I Environmental Site Assessment" that sets out lead impact berm avoidance and minimization measures.

5. Cumulative Impacts. The EA's cumulative impact analysis included past, present, and reasonably foreseeable future projects at and near the proposed site and an evaluation was made to determine if a potential relationship exists with any components of the preferred alternative. As discussed in the EA, two projects met these criteria: Iroquois Point Beach Nourishment and Stabilization and P-931 Pu'uloa Range Communications/Electrical and Gate Modernization. The cumulative impact analysis examines how the preferred alternative effects could interact with similar impacts associated with the Iroquois Point project because the two projects are located adjacent to one another on a continuous sandy shoreline. The cumulative impact analysis considered biological, geological, water resources, and infrastructure. No significant adverse cumulative effects were identified or are expected.

6. Impacts to Coastal Processes/Features. The wave action in front of PRTF is similar to the wave action at the adjacent Iroquois Point beach due to the nature of wave mechanics. Waves come on shore and break parallel to the coast because ocean floor topography is generally similar to the shape of the beach. As waves approach the coast they refract in shapes that mirror the coastline (Duxbury, et al. 2002. Fundamentals of Oceanography). The wave and circulation modeling conducted during the Iroquois Point project documented that the predominant longshore current along this coastline transports sand is from west to east so any feature would not contribute to shoreline erosion west of the PRTF boundary. The Marine Corps will continue to monitor coastal processes and erosion.

7. Public Involvement. The EA's Public Involvement Strategy was in accordance with the Council on Environmental Quality (CEQ) (40 Code of Federal Regulations subpart 1506.6), DoD, and USMC policies and guidance. The EA and draft FONSI were advertised in the local newspaper of record, the Honolulu Star-Advertiser, from August 29-31, 2019, and public comments on the issue were solicited from August 29 through September 13, 2019. No comments were received. In addition to the formal public involvement process, a subject matter expert from USMC provided a presentation on the EA and the NEPA process to the adjacent community of Ewa Beach at a Neighborhood Board meeting on November 14, 2019. A Notice of Availability was published in the March 23, 2020 edition of the State of Hawaii Office of Environmental Quality Control's The Environmental Notice publication and in the Honolulu Star-Advertiser from March 12-14, 2020. Both the FONSI and the EA were made publicly available on the MCB Hawaii website prior to the public comment period and remain available for public viewing at www.mcbhawaii.marines.mil.

SCR-48

Submitted on: 3/18/2021 11:03:07 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
John Bond	Testifying for Kanehili Cultural Hui	Support	No

Comments:

REQUESTING THE UNITED STATES MARINE CORPS TO COMPLETE AN ENVIRONMENTAL IMPACT STATEMENT FOR THE SHORELINE STABILIZATION PROJECT AT THE PUULOA RANGE TRAINING FACILITY.

Support

Aloha Chair, Senate Committee on Public Safety, Intergovernmental, and Military Affairs

This proposed project will have significant impacts on the shoreline beach, pile driving huge metal sheets damaging the karst reef ecosystem and much more that requires careful studies on a range of environmental issues.

John Bond, Kanehili Cultural Hui, Ewa, Honouliuli

LATE

SCR-48

Submitted on: 3/23/2021 1:01:21 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Doora Shin	Testifying for Surfrider Foundation	Support	No

Comments:

Aloha,

The Surfrider Foundation would like to offer this testimony in support of SCR48.

The Surfrider Foundation is a national nonprofit organization dedicated to the protection and enjoyment of our ocean, waves, and beaches. Surfrider maintains a network of over 150 chapters and academic clubs nationwide, including 4 chapters in the Hawaiian Islands. The Surfrider Foundation focuses on many aspects of the environment such as coastal protection, plastic pollution, and water quality.

This resolution requires a full EIS for the proposed Marine Corps project at Pu'uloa. Surfrider sent a comment letter to the Department of the Navy last year regarding our concerns about this project, especially regarding its threat to the sandy shoreline and the proposed seawall. The deposits of lead from the firing range activities are also of major concern. We would like to see a full EIS on this project before it moves forward.

Thank you for your consideration of this testimony in support of SCR48, submitted on the behalf of the Surfrider Foundation's 4 Chapters in Hawai'i and all of our members who live in the state and visit to enjoy the many coastal recreational opportunities offered by all of the islands' coastlines.

Mahalo,
Doora Shin
Oahu Chapter Coordinator
Surfrider Foundation

SCR-48

Submitted on: 3/18/2021 5:14:28 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Camille Naluai Rios	Individual	Support	No

Comments:

I am opposed to any further encroachment onto Hawaii Shorelines. Our beaches have been eroding for decades. Efforts to keep the shoreline replenished have been futile. Further development into the shoreline may solve the problem for the firing range in the short term but it is not a long term solution. MCBH should take this time to find a long term solution to this inevitable problem and relocate this facility to its Kaneohe location.

SCR-48

Submitted on: 3/18/2021 5:37:39 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Scott Gier	Individual	Support	No

Comments:

I have lived on Ewa Beach immediately next to the Puuloa Rifle Range for 73 years. The beach is healthy at the west end, where my house is located, as healthy as it has been in my humble living memory. The beach at the east end of the range has lost sand because of prior decisions to “armor” the beach with a series of large T-groins. These groins have produced wide sandy beaches on the Pearl Harbor side, to the benefit of commercial development, but have resulted in serious trade-wind eddy erosion on the west side of the westernmost groin, the east end of the rifle range. It is the act of armoring the east side of the rifle range that has resulted in serious lost of sand in that area.

That operation by itself has significantly altered the shoreline at the eastern end of the range. What the Marine Corps is planning to do now is compounding that mistake with an act of utter stupidity. Driving 1500 feet of sheet pile into the coral, destroying the natural foundation on which Ewa Beach depends for its existence is tragic arrogance. Once the coral is crushed, the footing lost, the sea will advance inexorably until one day it sweeps the sand away along the sheetmetal wall. And not stopping there, since the ocean does not care about federal land boundaries, it will destroy a significant part of Puuloa, the “Long Dune.”

Please respect the shoreline. Retreat from it. Do not destroy it.

SCR-48

Submitted on: 3/18/2021 5:42:21 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
caleb macdonald	Individual	Support	No

Comments:

The USMC owes due diligence in ensuring the continued protection of our coast. The Corps should consider moving this entire shooting range operation inland and selling the valuable coastal pualoa property to a developer that will provide housing.

SCR-48

Submitted on: 3/19/2021 3:27:12 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
leslie malloy	Individual	Support	No

Comments:

I am in favor

SCR-48

Submitted on: 3/19/2021 6:21:31 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Michael	Individual	Support	No

Comments:

I am in favor of SCR48. There must be an EIS done to protect the Ewa Shoreline.

SCR-48

Submitted on: 3/19/2021 8:36:46 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Fred Dente	Individual	Support	No

Comments:

Please support and vote for this bill, even though the ground rules are corrupt from the start. When the military does it's own EIS, the results are obviously predictable.

SCR-48

Submitted on: 3/19/2021 10:11:02 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
James Miller	Individual	Support	No

Comments:

I am in full support of this resolution.

SCR-48

Submitted on: 3/19/2021 12:11:11 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Kenneth Silva	Individual	Support	No

Comments:

I support SCR48. There should be a full EIS done for the proposed military project. The negative long term ramifications require the EIS.

Thank you.

SCR-48

Submitted on: 3/20/2021 10:09:27 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
garrin powers	Individual	Support	No

Comments:

I am in favor of SCR48

SCR-48

Submitted on: 3/21/2021 4:48:27 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Mary Lynn	Individual	Support	No

Comments:

I fully support SCR48. Environmental impact statements are done for a reason and no one, not even the government should be allowed to opt out. Hawaii is famous for its pristine beaches, but many of us grew up using beaches that were not famous such as the beaches of Ewa, Puuloa and Barbers Point. These beaches deserve care and consideration so that they remain healthy for the inhabitants who live there. SCR 48 should be passed so that wherever is done to the beach at Puuloa is done thoughtfully and with care to protect the marine life living there.

SCR-48

Submitted on: 3/20/2021 4:32:19 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
George "Bud" Antonelis. PhD	Individual	Support	No

Comments:

I am in favor of SCR48

SCR-48

Submitted on: 3/21/2021 11:10:15 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Haunani J. Oasay	Individual	Support	No

Comments:

I am in favor of SCR48

SCR-48

Submitted on: 3/22/2021 9:15:14 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
virginia mann	Individual	Support	No

Comments:

I believe we need a complete an environmental impact statement to protect the Ewa Beach shoreline

SCR-48

Submitted on: 3/22/2021 9:38:24 AM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Camile Cleveland	Individual	Support	No

Comments:

I support this bill.

SCR-48

Submitted on: 3/22/2021 12:32:04 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Jeannette Plowman	Individual	Support	No

Comments:

I support SCR 48.

The Kapilina groins are causing erosion damage to the historically stable Pu'uloa shoreline.

Hardening right next to Pu'uloa Beach Park will certainly have a significant impact to our sandy beach by increasing erosion.

Complete an EIS.

Just move the berms!

Thank you.

SCR-48

Submitted on: 3/22/2021 1:21:39 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

LATE

Submitted By	Organization	Testifier Position	Present at Hearing
Kelly Sadur	Individual	Support	No

Comments:

I support this measure. Our eco system does not need further damage. Save our shoreline from this destruction. NO WALL! Take the firing range somewhere else that is already established..

LATE

SCR-48

Submitted on: 3/22/2021 1:28:49 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

Submitted By	Organization	Testifier Position	Present at Hearing
Laurie Von Hamm	Individual	Support	No

Comments:

I am in favor of SCR48.

SCR-48

Submitted on: 3/22/2021 1:46:17 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

LATE

Submitted By	Organization	Testifier Position	Present at Hearing
Rhonda Sadur	Individual	Support	No

Comments:

They need to do an economic impact study. Save our AINA! NO WALL! Keep EWA Beach Shoreline in tact and do not disrupt our eco system!

False Crack Medivac!

SCR-48

Submitted on: 3/22/2021 3:58:18 PM

Testimony for PSM on 3/23/2021 1:10:00 PM

LATE

Submitted By	Organization	Testifier Position	Present at Hearing
mark moreno	Individual	Comments	No

Comments:

Save Ewa Beach beach front.. No walls..

SCR-48

Submitted on: 3/22/2021 10:39:15 PM

Testimony for PSM on 3/23/2021 1:10:00 PM



Submitted By	Organization	Testifier Position	Present at Hearing
Karen Luke	Individual	Support	No

Comments:

I support SCR48. I am a resident west of this project. I've seen the impact shoreline activity has as the waves pass me bringing sediment and floating trash with the waves moving west to east most of the year. Hardening the shoreline has been an ecological nightmare to our flora and fauna.

Ewa Beach was know for limu. Today, there is none because of all the building along the shore. The Federal government must follow the state governments rule against closing off beaches and hardening the shoreline.

Please pass SCR 48.

Mahalo, Karen in Ewa Beach