



**UNITED STATES MARINE CORPS**  
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CO  
20 APR 2023

HAWAII STATE HOUSE OF REPRESENTATIVES  
THE THIRTY-SECOND LEGISLATURE  
REGULAR SESSION OF 2023  
COMMITTEE ON JUDICIARY AND HAWAIIAN AFFAIRS  
Room 325  
State Capitol  
415 South Beretania Street

**SUBJECT: TESTIMONY TO VALIDATE THE MILITARY NECESSITY OF THE PU'UOLA RANGE TRAINING FACILITY (PRTF)**

**ENCLOSURE (1): MCBH FEEDBACK TO THE PROPOSED HOUSE RESOLUTION 104 HD1**

Honorable Members of the House Committee on Judiciary and Hawaiian Affairs:

The Marine Corps has operated the Pu'uola Range Training Facility (PRTF) located in Ewa Beach, Hawaii, since the early 1900s. The range is a critical facility for the Marine Corps as it is the only place in Hawaii where your Marines can conduct their required known-distance marksmanship training – no other facility offers this necessary capability. Unlike other services, all Marines are required to conduct the Annual Rifle Qualification from up to 500 yards regardless of their job specialty, as every Marine must be an effective rifleman first and foremost.

Through over a century of operation, this facility has trained hundreds of thousands of Marines in critical rifle and pistol skills that enable Marines to respond to our nation's call. As you are aware, Marines are America's 911 force, and must remain capable to respond to a wide variety of potential crisis events in a matter of hours. One of the most basic skills a Marine must possess and continually hone is the ability to maintain marksmanship proficiency. As stated, PRTF is the only place in Hawaii that Marines can accomplish this irreplaceable training. Approximately 7,000 Hawaii-based Marines a year train at PRTF, in addition to other services and government agencies, to include local, state and federal law enforcement agencies.

We have worked in close partnership with our community and elected officials to mitigate potential impacts to the surrounding community, specifically those residing in close proximity to the range. We understand the concerns regarding loud noise associated with our training, and because of that, we have worked with the surrounding community by mitigating noise impacts, to include changing the direction of our loudspeakers which are required to safely conduct live fire training, notifying the community when there are necessary changes to the firing schedule, permanently changed the start time of daily training, and in many other instances. We have been, and remain committed, to continued close cooperation and coordination in order to mitigate impacts as much as possible while maintaining our ability to train Marines to standard at the PRTF.

We look forward to continued cooperation from our friends and neighbors in the Ewa Beach

community, whom we have worked together with for decades, and to addressing concerns and resolving problems in a reasonable, responsible manner. We also look forward to sharing factual information which will assist this committee in ensuring accuracy on the proposed House Resolution 104. Enclosed in this letter is feedback from myself and my staff regarding the content of HR104. Annotated in red below individual paragraphs are factual corrections, feedback, and clarifying points that I know you will take into consideration.

My Point of Contact for this matter is 1stLt Mark McDonough at [mark.mcdonough@usmc.mil](mailto:mark.mcdonough@usmc.mil) or 808-257-1397.



S. C. KOUMPARAKIS  
Colonel, U.S. Marine Corps  
Commanding Office

HOUSE OF REPRESENTATIVES  
THIRTY-SECOND LEGISLATURE, 2023  
STATE OF HAWAII

H.R. NO. 104  
H.D. 1

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# HOUSE RESOLUTION

REQUESTING THE RELOCATION OF ALL LIVE FIRE TRAINING AND AVIATION  
ACTIVITIES AWAY FROM THE PU'ULOA RANGE TRAINING FACILITY.

WHEREAS, the area now known as the Pu'uloa Range Training Facility was transferred from the United States Army to the United States Navy between 1915 and 1916 and developed into a small-arms range; and

WHEREAS, the range supported long-range sniper training for a short period of time during the Vietnam War era until 1979, when the training was moved to Marine Corps Air Station Kaneohe Bay, now known as Marine Corps Base Hawaii; and

This is not accurate. Sniper training was supported at Pu'uloa Range Training Facility (PRTF) between 1979 and 2011. However, this training did not meet the minimum requirements stipulated by the Marine Corps to properly train snipers. A 1000 yard "known distance" range was necessary and properly made available at PRTF in 2011. This range at PRTF is the only 1000 yard "known distance" range in Hawaii and allows the Marine Corps and other branches of the military to meet necessary training requirements.

WHEREAS, in the thirty-two years following the departure of the sniper range, Iroquois Point, now known as Kapilina, and 'Ewa Beach were connected by an access road mauka of the Pu'uloa Range Training Facility that allowed TheBus of the City and County of Honolulu to service Iroquois Point; and

This is misleading. Sniper training took place at both PRTF and Kaneohe between 1979 and 2011. Furthermore, The on-base access road mauka of the training ranges was open to use by TheBus until military housing at Iroquois Point was privatized in 2003, allowing both military and civilian tenants. Sniper training did not cause this change in road access aboard the facility.

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WHEREAS, in 2011, Marine Corps Base Hawaii doubled the length of the Alpha Range in the Pu'uloa Range Training Facility, which is closest to the 'Ewa Beach community, thereby re-establishing the sniper range without public participation or conducting an environmental assessment despite the addition of the United States Marine Corps' loudest small-arms rifle shooting from a significantly different location that altered surface danger zones and noise contours; and

**REQUEST** the highlighted portion be removed as it is not factual. The remainder of this paragraph is misleading as no community input was required under the National Environmental Protection Act (NEPA). MCBH conducted a Categorical Exclusion (CATEX) thereby fulfilling all NEPA requirements. The vast majority of weapons fired at the 1000 yard firing position are rifles equipped with suppressors (also commonly known as "silencers") and do not produce an increase in noise when compared to other weapons training at PRTF's other ranges.

WHEREAS, the closure of the access road due to the expansion of the Alpha Range resulted in the isolation of the communities of Iroquois Point and 'Ewa Beach from each other, termination of TheBus services to Iroquois Point, and elimination of a potential tsunami evacuation route; and

**REQUEST** the above highlighted portion be removed as it is false. The privatization of Iroquois Point housing does not eliminate the on-base access road as a potential tsunami evacuation route. When necessary, MCBH would allow the use of the on-base access road to assist in evacuations.

WHEREAS, in recent years, Pu'uloa Range Training Facility personnel have routinely operated a powerful public address system well before 7:00 a.m. in violation of the Clean Air Act, which has resulted in hundreds of noise complaints from the surrounding community without relief; and

After careful and extensive review, MCBH Environmental Compliance and Protection personnel do not believe that PRTF violates the Clean Air Act. Functionality tests and range organization using speakers does start at 6:30 a.m. when necessary. Delaying training further would cause shooting to continue further into the evening hours. MCBH established the 7:00 a.m. live-fire start time, which is later than most ranges in the Marine Corps, to ensure we limit the period of noise heard by neighbors.

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WHEREAS, incessant noise pollution from the simultaneous firing of weapons by dozens of shooters commences promptly at 7:00 a.m., persists throughout the day, and sometimes into the night; and

Please see the above response. Night training is necessary and unavoidable but not common. Since January 2023, only (3) night training events have occurred.

WHEREAS, Marine Corps Base Hawaii recently announced that the Pu'uloa Range Training Facility would be used as a helicopter night landing zone, significantly increasing existing noise pollution outside of normal range hours; and

**REQUEST** this paragraph be deleted in its entirety as it is not factual. PRTF in its current form has always been able to act as a landing zone for aircraft. However, this does not occur regularly and only out of necessity to support training. The announcement referenced was a Jan. 9, 2023 Public Advisory published by MCBH as a courtesy notification to neighboring residents of a rare instance of aircraft activity lasting only a short period to support required training. The use of a single training event and courtesy notification to justify the closure of a facility is inaccurate and not consistent with the Marine Corps' intent or actions. PRTF can also be used as an emergency evacuation point for first responder aircraft.

WHEREAS, Harvard Medical School researchers have shown that persistent noise pollution, such as that experienced by the residents surrounding the Pu'uloa Range Training Facility, not only drives hearing loss, tinnitus, and hypersensitivity to sound, but can cause or exacerbate cardiovascular disease; type 2 diabetes; sleep disturbances; stress; mental health and cognition problems, including memory impairment and attention deficits; childhood learning delays; and low birth weight or miscarriage; and

The study referenced is unrelated to PRTF and the type of noise characteristics produced by training operations conducted there. We acknowledge loud noise is unwanted, and continually cooperate with our friends and neighbors to mitigate noise impacts.

WHEREAS, scientists are investigating other effects of noise pollution, including possible links to dementia; and

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WHEREAS, since the Pu'uloa Range Training Facility is an open-air range, there is a potential for stray bullet impact to nearby schools, churches, homes, parks, and low- or slow-flying passenger aircraft, all of which are within the firing distance of weapons typically fired at the Pu'uloa Range Training Facility, via ricochet, accidental weapons discharge, or the intentional directing of weapons fire off-range; and

**REQUEST** the above highlighted section, if not the whole paragraph, be removed. It is misleading and includes inaccurate aspects. The highlighted section infers, without precedent, that a service member would knowingly and deliberately fire their weapon toward off-range areas in a way that would danger the community. The safety measures, training limitations, and infrastructure implemented at PRTF thoroughly ensures the safety of not only those training at the facility but especially that of the community and surrounding residential areas. Range safety measures are comprehensive and detailed in nature; MCBH subject matter experts can be made available if more information is necessary. There have been no instances of injury or harm to off-base community members identified by PRTF staff or reported by the community to MCBH.

WHEREAS, false alarm school lockdowns have even occurred in the 'Ewa Beach area due to range gunfire being mistaken as an active shooter situation; and

**REQUEST** the above sentence be removed. We believe this statement is false. No false alarm school lockdowns potentially caused by training at the range facility have ever been reported to MCBH or PRTF staff by community members or law enforcement. No news coverage has ever cited PRTF as the cause of a school lockdown.

WHEREAS, in April 2021, the Deputy Commandant for Installations and Logistics of the United States Marine Corps specifically directed Marine Corps Base Hawaii to perform a range compatible use zone study via Marine Corps Order 3550.13; however, Marine Corps Base Hawaii refused to release the study results after it was properly requested by 'Ewa Beach residents via a Freedom of Information Act request in 2022; and

As required by Marine Corps Order 3550.13, MCBH is in the process of ensuring compliance and conducting the required compatible use zone study. As this became a requirement in April 2021, accomplishing the conditions outline in the

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order will take time to accomplish. Unfortunately, no funding was associated with this order, although MCBH continues to seek funding for this and other mitigation of potential impact to the community. We greatly appreciate the legislature's assistance with securing funding for MCBH priorities in the past as well as for PRTF in the future.

WHEREAS, significant lead contamination of over seventy times the legal limit and a high risk of off-range migration of munitions constituents to nearshore waters and adjacent homes and the Pu'uloa Beach Park have been identified at the Pu'uloa Range Training Facility, and the proposed remedy of moving only the short distance pistol ranges forty meters landward does not adequately address the long-term threat of lead poisoning, especially given that Marine Corps Base Hawaii has no intention to retreat the significantly larger Alpha and Bravo Ranges that are within two hundred thirty feet of homes and four hundred feet from Pu'uloa Beach Park where thousands of children play each month; and

PRTF does not create a human health risk to children at Pu'uloa Beach Park. The Hawaii Department of Health participated in sampling efforts and confirmed the findings. This information is incorrect and misleading. The legal limit referenced applies when lead is in the environment in proximity to human habitation. This limit does not apply to lead inside a federal shooting range facility. The singular study being referenced cited soil samples taken from the impact berms located on the facility. No elevated levels of lead have been identified in areas surrounding PRTF. Marine Corps Base Hawaii remains committed to protecting the environment and neighboring communities surrounding PRTF. The presence of lead in the impact berms at PRTF is not surprising or, in itself, any cause for concern. Lead from munitions constituents are inherent to firing range impact berms. There are no test results indicating at this time that lead is leaving the boundaries of PRTF. MCBH's primary concern at PRTF is the impacts of shoreline erosion along PRTF, which may potentially be the causation of lead migration from the range in the future. However, MCBH has developed a plan in close cooperation with Hawaii Department of Health that will effectively mitigate the impacts of shoreline erosion on the firing range berms at PRTF and ensure that munitions constituents remain within the training ranges. In February of this year, MCBH began moving Foxtrot range 40 meters inland from the shoreline because of its proximity to areas

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that are experiencing signs of erosion. Future actions will move an additional three ranges inland and adjacent to the new Foxtrot Range location. These actions were taken in concurrence with the Hawaii Department of Health and are adequate to effectively mitigate the effects of erosion and ensure munitions constituents do not migrate from within the PRTF.

WHEREAS, the Department of Hawaiian Home Lands recently announced the planned construction of approximately six hundred homes on the eighty-five acre parcel, formerly the Pacific Tsunami Warning Center, directly adjacent to the Pu'uloa Range Training Facility; and

Pu'uloa Range Training Facility is an existing facility in the area. Marine Corps Base Hawaii has been working closely with the State of Hawaii, and will continue to do so, to ensure that PRTF remains compatible with the area, especially with the establishment of much needed housing. A partnership between the Department of Hawaiian Home Lands and the Office of Local Defense Community Cooperation (OLDCC) could provide funding to implement sound mitigations when building these homes.

WHEREAS, the native Hawaiian families who will reside in these homes have little choice in where they will acquire shelter through the Department of Hawaiian Home Lands, and the pollution and other imminent hazards produced by the Pu'uloa Range Training Facility will significantly impact their health and safety; and

WHEREAS, impact berms at the Pu'uloa Range Training Facility are within tens of feet of the high-water mark and, in some cases, interacting with wave activity, causing the off-range migration of munitions constituents; and

**REQUEST** the above highlighted portion be removed. It is not accurate. There have been no studies that show this happening at PRTF. In fact, the sampling outlined in the study being cited in the resolution shows normal lead levels in all areas tested that are located outside of PRTF's boundaries. As stated above, areas of Pu'uloa Range Training Facility that have been identified as potential areas of future erosion are being moved a sufficient distance inland in close cooperation with Hawaii Department of Health.



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WHEREAS, Marine Corps Base Hawaii's preferred alternative for erosion mitigation at the Pu'uloa Range Training Facility includes hardening the shoreline with a one thousand five hundred foot corrugated steel sheet pile bulkhead, which is inconsistent with Hawaii Coastal Zone Management law; and

While factual, this is misleading. In MCBH's 2019 Shoreline Stabilization EA, the preferred alternative for erosion mitigation at PRTF was to utilize sheet metal piles in some areas along the facility. This mitigation measure was determined to be a *de minimis* action under the Hawaii Coastal Zone Management law by the Coastal Zone Management Office. Following feedback from community members and elected officials, MCBH committed to cease pursuing the use of sheet metal piles, and continues to pursue other mitigation, to include vegetation and nature based solutions.

WHEREAS, thousands of shooters annually must commute from Marine Corps Base Hawaii in Kaneohe to and from the Pu'uloa Range Training Facility, which significantly adds to vehicle pollution, traffic congestion, and carbon output; and

PRTF is one of a few areas on Oahu owned and operated by the Marine Corps. This location would be used for other purposes if live firearms training was to cease aboard the facility. As a long term part of the Ewa community, MCBH will inherently continue to contribute the levels or vehicle traffic.

WHEREAS, the State is constructing a First-Responder Campus in Mililani, featuring a one hundred thousand square foot indoor shooting range that will significantly reduce the demand by non-United States Department of Defense users of the Pu'uloa Range Training Facility; and

WHEREAS, upon completion of Camp Blaz in Guam, the Pu'uloa Range Training Facility's sniper distance range will no longer be the only range of its kind in the Pacific; and

Guam is located over 4,000 miles from the islands of Hawaii, and movement of Marines to Guam for marksmanship training is simply not feasible from a cost and logistics perspective. Regardless of whether sniper training with suppressed sniper rifles takes place in Hawaii, PRTF is the only location in the state that the approximately 7,000

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active duty Hawaii based Marines can complete their required Annual Rifle Qualification.

WHEREAS, the Pu'uloa Range Training Facility sniper range has previously been relocated to the more appropriate Marine Corps Base Hawaii in Kaneohe and could be relocated again; and

This is not accurate. Sniper training took place at PRTF between 1979 and 2011. However, the Marine Corps lacked the required "known distance" 1,000 yard range which was established in 2011. The necessary 1,000 yard "known distance" range sniper training has never taken place at Marine Corps Base Hawaii in Kaneohe and would be unattainable at the available training ranges located on the Mokapu Peninsula

WHEREAS, live fire training at the Pu'uloa Range Training Facility is incompatible with the 'Ewa Beach community given its close proximity to residences, schools, churches, public parks, and low flying passenger aircraft flight paths; now, therefore,

Puuloa Range Training Facility has been located in Ewa Beach for over a century and the current reality of residential areas was not the case when established. Marine Corps Base Hawaii is extremely committed to ensuring PRTF remains compatible with the community of Ewa Beach through minimizing the impacts our training noise has on the area. By pursuing sound dampening barriers along the western side of the facility and developing a more efficient sound system using multiple smaller speakers along the firing lines, we believe additional noise mitigation can be established for the comfort of our neighbors.

BE IT RESOLVED by the House of Representatives of the Thirty-second Legislature of the State of Hawaii, Regular Session of 2023, that all live fire training and aviation activities are requested to be relocated away from the Pu'uloa Range Training Facility; and

**BELOW ARE MCBH'S RECOMMENDED REPLACEMENT "BE IT RESOLVED" MEASURES, REQUEST STRIKING THE ABOVE PARAGRAPH.**

BE IT RESOLVED by the Senate of the Thirty-second Legislature of the State of Hawaii, Regular Session of 2023, that the United States Marine Corps is urged to conduct in-depth testing for munitions constituents along

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the shoreline of Pu'uloa Range Training Facility to ensure no munitions constituents are migrating into the surrounding environment; and

BE IT RESOLVED by the Senate of the Thirty-second Legislature of the State of Hawaii, Regular Session of 2023, that the United States Marine Corps is urged to construct sound dampening barriers along the western perimeter of Pu'uloa Range Training Facility to mitigate noise impacts to areas of the community located near the facility; and

BE IT RESOLVED by the Senate of the Thirty-second Legislature of the State of Hawaii, Regular Session of 2023, that the United States Marine Corps is urged to acquire a new, more efficient speaker system, including multiple smaller speakers along the firing lines of the facility, to mitigate the speaker noise heard in the community while still ensuring the safety of personnel being trained; and

BE IT RESOLVED by the Senate of the Thirty-second Legislature of the State of Hawaii, Regular Session of 2023, that the State of Hawaii seek a partnership with the Office of Local Defense Community Cooperation (OLDCC) to acquire funding for noise mitigation features for implementation into current and future houses being affected by training sounds from the Pu'uloa Range Training Facility; and

BE IT FURTHER RESOLVED that certified copies of this Resolution be transmitted to the Commandant of the United States Marine Corps; Commander, INDO-PACIFIC Command; Commander, Naval Facilities Engineering Command Pacific; Commanding General, Marine Installations Pacific; Commander, Marine Corps Base Hawaii; members of Hawaii's Congressional Delegation; Governor; Chairperson of the Board of Land and Natural Resources; Director of Health; Mayor of the City and County of Honolulu; and members of the Honolulu City Council.

**HR-104-HD-1**

Submitted on: 4/20/2023 1:29:40 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Alexander Gaos	Ewa Neighborhood Board #23	Support	In Person

Comments:

Aloha,

Please receive a cordial greeting on behalf of myself and the Ewa Beach Community. As a current member of the Ewa Neighborhood Board #23 (ENB#23) and having served in this role (and as co-Chair) for several years, I am compelled to share my staunch support for House Resolution 104 and relocation of all live fire training and aviation activities from the Pu‘uloa Range Training Facility (PRTF). During my time on the ENB#23, I have received more complaints and grievances from my constituents about the operation and effects of the PRTF than any other issue in our community, bar none.

There are a multitude of harmful and negative impacts to the surrounding communities stemming from the range, the synergistic nature of which have led to the introduction of HR104 and overwhelming community backing for relocation of the range. As my constituents have made clear to me, the range simply is not compatible with the current surrounding communities. Issues include noise pollution, safety threats (e.g., stray bullets, loss of a primary Tsunami evacuation route), limits to recreational areas (e.g., waters fronting the range), and potentially life-threatening lead contamination (to air, soil, and water), all of which impact schools and residents, including keiki, kupuna, military veterans (many suffering from PTSD), and the public in general. The planned addition of approximately 600 DHHL homes adjacent to the range in the near future will only add to the ongoing detriments and threats posed by the range.

Due to these concerns, the ENB#23 recently (29 March 2023) adopted a resolution (which passed unanimously) that called for the relocation of the range. As a representative for my community it is my responsibility to share the communities strong opposition to the ongoing function of the range in its current location.

It is also my responsibility to point out that we strongly support US Marines and military preparedness, but are keenly aware such preparedness can be achieved by relocating such activities to existing or new training facilities on Oahu. Although the Marines often put forth the argument for the ongoing operation of PRFT is necessary because it represents the only known 1000-yard shooting range on the island and thus is essential for training, such a range could be established elsewhere on the island, thus eliminating the need for the ongoing use of a range situated in the middle of a densely populated community. Given that Ewa Beach is one of the

fastest growing and rapidly evolving areas of the state, relocating PRFT is an important step to limit marginalization of this portion of Oahu and ensure equity across our island home.

Kind regards,

Alexander R. Gaos, PhD

Member

Ewa Neighborhood Board #23

# HOUSE COMMITTEE ON JUDICIARY AND HAWAIIAN AFFAIRS

April 21, 2023

2:00 PM

Conference room 325

## In **SUPPORT** of **HR104** Requesting the Relocation of ALL Live Fire and Aviation Activities away from the Pu'uloa Range Training Facility

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Aloha Chair Tarnes, Vice Chair Takayama and Members of the Committee,

I am a lifelong Resident of 'Ewa Beach and member of the 'Ewa Neighborhood Board and I am writing in **SUPPORT** of HR104 which would urge the relocation of all live fire and aviation activities away from the Pu'uloa Range Training Facility.

The Pu'uloa Range Training Facility (PRTF) in 'Ewa Beach has attracted increased attention in recent years, due in part to a change in firing range configuration at Marine Corps Base Hawaii (MCBH) Kaneohe [Ulupau Crater ranges](#), which moved all USMC annual training to Pu'uloa, along with a doubling of the size of the PRTF Alpha Range to 1000 yards, and the addition of a "Giant Voice" PA system routinely activated prior to 7:00am. Increased public scrutiny brought on by the increased noise footprint and a loss of thoroughfare between 'Ewa Beach and Iroquois Pt revealed many glaring issues of health, safety and incompatibility of the outdated range with the community.

The 'Ewa Neighborhood Board recently passed a [resolution requesting the USMC terminate live fire training and aviation operations at PRTF](#), citing incompatibility with nearby schools, parks, homes, churches, and low-flying arrivals to Daniel K Inouye Intl Airport.

The 'Ewa community recognizes the significant impacts to health and safety PRTF presents to the surrounding community in the form of prolific noise pollution, lead poisoning ( [Surfrider Foundation Pu'uloa lead report](#)), and bullets exiting the open-air range.

The USMC recently revealed their wholly inadequate plan to mitigate potential off-range lead migration. Currently, the USMC has moved an insignificant fraction of the volume of contaminated soil at PRTF from the Foxtrot range. After sifting out large chunks of lead, the remaining contaminated soil will be repurposed on PRTF a mere 40 meters from the shoreline, still well within reach of storm surge, tsunami inundation, and sea level rise. MCBH spokespersons state no intention to retreat the overwhelming majority of contaminated soil which makes up the Alpha and Bravo range impact berms.



Current disposition of contaminated remains of Fox Trot impact berm.

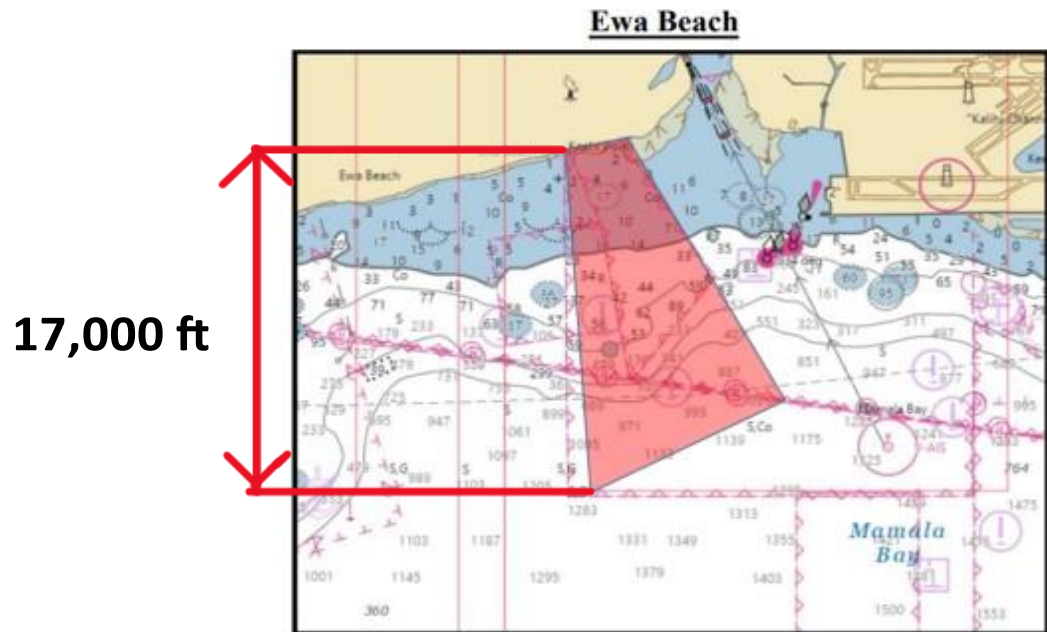
The Department of Hawaiian Home Lands (DHHL) recently announced a plan to construct 600 homes immediately adjacent to PRTF on the former Pacific Tsunami Warning Center parcel. The incompatibility issues and health and safety risks are certain to worsen and raise new issues with the addition of 600 families in a location incompatible with live firing of weapons of war.



PRTF could not be built in its current location if it were proposed today. For reasons of airspace issues alone, a location with a comparable—albeit less critical—position in relation to the Guam International Airport as PRTF is to HNL, was deemed an unmitigable risk to air traffic by the FAA in 2013, and the Department of the Navy was forced to build their new USMC firing range on a different part of the island.

Investigation into published danger zones of weapons used at PRTF reveals that aircraft approaching all runways at HNL from the west must fly through the vertical and horizontal danger zone limits of weapons typically fired at PRTF.

## **HORIZONTAL DANGER ZONE = 17,349 ft.**



Source: USCG Notice to Mariners

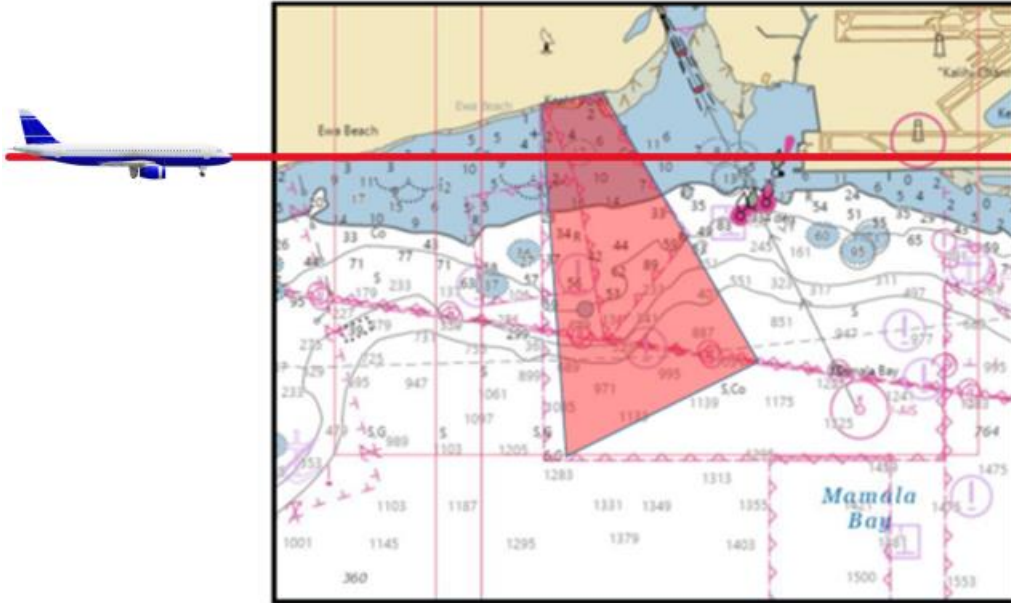
## **VERTICAL DANGER ZONE FOR WEAPONS**

**TYPICALLY FIRED AT PRTF >2500'**

**AIRCRAFT ALTITUDE WHEN PASSING OVER/IN FRONT OF PRTF is 600-900'**

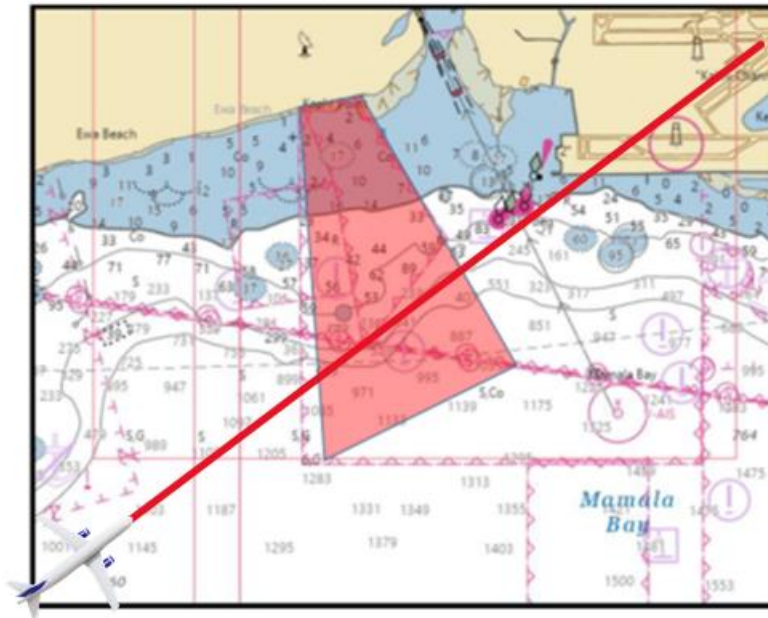


### Ewa Beach



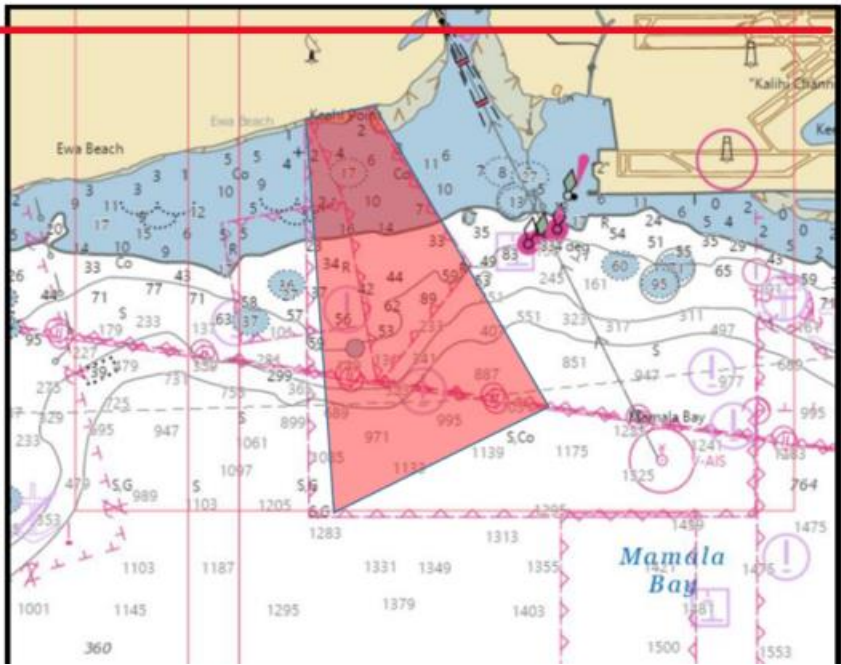
**RWY 8R Flight Path**

### Ewa Beach



**RWY 4L & 4R Flight Path**

# Ewa Beach



RWY 8L Flight Path

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PRTF advertises a 17,000ft surface danger zone to the south of the range, but a range ring centered on PRTF depicting the weapons envelope of common assault and sniper weapons fired at PRTF would encompass Ocean Pointe to the west, Ewa Gentry, 'Ewa Villages, and portions of West Loch Estates to the northwest. To the east, the envelope reaches Hickam housing. An accidental discharge or intentional directing of gunfire off-range puts thousands of people at risk from stray bullets.



### **17,000' radius**

In April 2021, the Deputy Commandant for Installations and Logistics of the United States Marine Corps specifically directed Marine Corps Base Hawaii to perform a Range Compatible Use Zone (RCUZ) study via [Marine Corps Order 3550.13](#); however, Marine Corps Base Hawaii refused to release the study after it was properly requested by 'Ewa Beach residents via a Freedom of Information Act request in late 2022. Subsequent USMC testimony for HR104 revealed that the compatibility study was not conducted, citing lack of funding.

Given the litany of health and safety hazards PRTF poses to the community and flying public, PRTF must cease all live fire operations immediately, and a relocation plan be enacted that more efficiently and safely uses existing range land at Ulupau Crater and Schofield Barracks.

Michael Plowman

'Ewa Beach Resident

'Ewa Neighborhood Board member

**HR-104-HD-1**

Submitted on: 4/19/2023 9:15:33 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sandy Ward	Hui o Ho`ohonua	Support	Written Testimony Only

Comments:

Dear Members of the Judicial and Hawaiian Affairs Committee,

As the executive director of a community non-profit working to restore abundance to the Pearl Harbor shoreline and nearshore waters, I urge you to pass HR104 HD1. Our organization works with 28 schools in the region and in the next week alone, I'll be hosting 3 of them at our Honouliuli Restoration site. I want to be able to tell them that while they continue to show up to do the hard work of restoration that our legislators and our military are doing all that they can.

I want to tell them that you had the courage and the military had the will to move the Pu`uloa Firing Range and mitigate the lead pollution that exists on the site - a site right next to a public park where many of these students swim and enjoy with their families. There are no safe levels of lead and the DoD has the resources to move the facility indoors within their extensive bases - including JBPHH and Schofield-Wheeler.

I am trusting you to address the threat the firing range poses to public safety above all other considerations - especially in the shadow of the ongoing Red Hill water contamination crisis. I am also trusting that we are moving into a new era of our legislators holding the DoD accountable for pollution that threatens the food and water security of every citizen on this island.

Mahalo for your consideration.

**HR-104-HD-1**

Submitted on: 4/20/2023 7:25:02 AM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Jerry Yuen	Pu'uloa Rifle and Pistol Club	Oppose	Written Testimony Only

Comments:

I oppose HR104 HD1. This resolution seeks to remove a vital asset required for training the the armed services and the hunting and sport shooting community.

The Pu'uloa Range Training Facility has been in operation since 1917 and is the only facility within 2500 miles that the US Marines can conduct the annual rifle qualification training that is a prerequisite testing requirement for Marines going on deployment.

There is currently no range on the island of Oahu that can substitute for this type of training at Schofield or Kaneohe due to the volume of pax output or distances required. 500 meters distance is required for Marine Rifle Qualification. The Army requires 300 meters. Schofield ranges are the most difficult to schedule due to overlapping surface danger zones that prevent many ranges from being used when others are in operation.

The Pu'uloa ranges are the only ranges that conduct marksmanship competitions in accordance with the National Rifle Association and the Civillian Marksmanship Program. It is also a community resource for hunters and hobbyists to practice and perfect marksmanship skills.

Jerry Yuen

President Pu'uloa Rifle and Pistol Club.



March 22, 2023

The Surfrider Foundation is dedicated to the protection and enjoyment of the world's ocean, waves and beaches, for all people, through a powerful activist network. Our multi-mission work includes coastal preservation by taking on issues that threaten our beaches and natural shorelines and working with decision-makers to ensure full and fair beach access for all to enjoy.

Surfrider Foundation O'ahu Chapter (SFO) recently launched a campaign to further the safety of the 'Ewa Beach residents and Pu'uloa beachgoers from high concentrations of toxic Munitions Constituents (lead) that exist on the Department of the Navy Pu'uloa Range Training Facility (PRTF). While Marine Corps Base Hawai'i (MCBH) has taken some corrective action, SFO concurs with HR104 in that MCBH has stated there is no intention to retreat impact berms at ranges Alpha and Bravo, which are the closest berms to 'Ewa Beach residences and the Pu'uloa Beach Park.

SFO supports remediating contamination and repurposing the PRTF in such a manner that Native Hawaiian gathering rights be restored via unrestricted public beach access to the half mile of sandy Pu'uloa shoreline and supports HR104. We appreciate your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "E. Benyshek". The signature is written in a cursive style with a large, stylized "E" and "B".

Elizabeth Benyshek  
Chair, Surfrider Foundation O'ahu Chapter



# SIERRA CLUB OF HAWAI'I

## HOUSE COMMITTEE ON JUDICIARY & HAWAIIAN AFFAIRS

April 21, 2023

2:00 PM

Conference Room 325

**In SUPPORT of HR104 HD1:** Requesting the Relocation of All Live Fire and Aviation Activities away from the Pu'uloa Training Facility

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Aloha Chair Tarnas, Vice Chair Takayama, and Members of the Committee,

On behalf of our 20,000 members and supporters, the Sierra Club of Hawai'i **SUPPORTS** HR104 HD1, which would urge Department of Defense and other decisionmakers to halt the continued and increased degradation of natural and cultural resources from live fire and aviation activities at the Pu'uloa Range Training Facility ("PRTF").

As we wrestle with ever more revelations of land and water contamination across the islands, and as we face an ever-growing planetary crisis threatening to upend our very ways of life, we must do what it takes to prevent any further harm to the very environment and social fabric that we, our children, and future generations will need to continue calling Hawai'i home.

The Sierra Club understands that high levels of lead contamination from live fire training has already been found in the region surrounding the PRTF, and that planned activities at the site – including shoreline hardening for erosion control as well as potential increased aviation activities, with the attendant risk of fuel releases or fires – could also significantly impact adjacent cultural sites and nearshore resources relied upon for cultural and subsistence practices.

Accordingly, in order to prevent the continued and increased destruction of critical natural and cultural resources in Pu'uloa, a reconsideration of any plan to continue live fire training and conduct new aviation activities at the PRTF would be both timely and critical.

The Sierra Club does respectfully ask that the Committee further urge all relevant decisionmakers to ensure that other communities and natural and cultural resources in other areas are also protected from similar impacts, in any proposed relocation of live fire and aviation activities from the PRTF – particularly in regions that have been disproportionately burdened by historical and ongoing environmental injustices.

Therefore, the Sierra Club of Hawai'i respectfully urges the Committee to **PASS** HR104. HD1. Mahalo nui for your consideration of this testimony.



**HR-104-HD-1**

Submitted on: 4/20/2023 2:41:49 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Mikiala Lidstone	Ulu A'e Learning Center	Support	Written Testimony Only

Comments:

Aloha. My name is Miki'ala Lidstone. I'm the Executive Director of the Ulu A'e Learning Center. We serve over 300 elementary and middle school students every year through out-of-school programs in the moku of 'Ewa. We grow rooted and engaged children and youth. We grow their love and engagement in the place they live by taking them to sites in their community to care for those places and to learn the history and stories of the place they call home. We do this so they become contributing members and want to be problem solvers for their community.

For all the years that we've been running programs, Pu'uloa Beach Park has been one of our favorite places to visit. We hold our Keiki Warrior fitness classes there, we swim in the ocean, we play in the sand, we use the showers, we walk on the grass. We've always felt safe there and it's there that we really feel the power of place.

This past July I learned of the lead contamination at the Puuloa Shooting Range and I cease all our visits to Pu'uloa Beach Park.

I don't gamble with the health and well being of our children and my staff.

It broke my heart to do this. It broke the hearts of my staff and it especially broke the hearts of my young students.

The fact that this shooting range is still operational even after the Surfrider study found lead contamination is heartless to me. When you learn that your environment is poisonous and you know your neighboring environment is a place where hundreds of children frequent, I would think you would stop operations and move. There's other places you can go. I support HR 104 to relocate Pu'uloa Shooting Range.

**HR-104-HD-1**

Submitted on: 4/20/2023 4:50:13 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Zhizi Xiong	CARES	Comments	Remotely Via Zoom

Comments:

CARES testifies to provide comments.

**HR-104-HD-1**

Submitted on: 4/19/2023 9:07:49 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Karen Luke	Individual	Support	In Person

Comments:

Aloha Chair Tarnas, Vice Chair Takayama, and Members of the Committee,

HR104 is a good resolution that addresses the noise that has been increasing over the build up of the the Gun Range. It never used to be like this, but now the new PA system is so annoying that my blood pressure has been affected. It is also distressing to hear that our children have been subjected to a false alarm school lockdowns due to gunfire being mistaken as an active shooter situation. The impact of the news of mass shootings at schools does not escape our children. Please vote in favor of this bill for my health and to spare our children the fear of an active shooter in school, even if it is only a false alarm.

Mahalo for your favorable response.

Karen Luke in Ewa Beach--a mile away from the range.

**HR-104-HD-1**

Submitted on: 4/20/2023 12:35:11 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Radhika Jit	Individual	Support	In Person

Comments:

I am a proud Ewa resident. Pu’uloa range is located in the middle of a densely populated neighborhood, in close proximity to schools, homes, and parks. The range poses numerous health and safety threats to Ewa residents, and the Navy should immediately relocate the range to a non-residential area of the island.

Similar to the calls to shut down Red Hill, HR104 represents the culmination of many years of significant concerns from residents coming to a breaking point. This includes public health, safety, noise, and environmental concerns, including proposed destructive shoreline hardening, toxic levels of lead contamination in the soil within a few hundred feet of the beach park where hundreds of keiki play each week, potential off-range bullet migration, loud weapons firing, and a powerful PA system often operated in pre-dawn hours in violation of local laws. The proposed DHHL construction of approximately 600 homes for Native Hawaiians immediately adjacent to the range is also an imminent threat to mental and physical health.

As detailed in HR 104, the military has ample land and options on Oahu and across the region to relocate the range to an area that does not threaten residents and the shoreline. Please pass HR104 and prioritize the health and safety of Ewa residents.

**HR-104-HD-1**

Submitted on: 4/21/2023 9:49:03 AM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kaili Swan	Individual	Support	Remotely Via Zoom

Comments:

i am in strong support of this measure beascuse noise form the gunfire from the training facility can cause an emergency lockdown procedure in pubilic school it would be possible to relocate the training facility somewere else away from the public school so it wont tragger their emergency response plan in their public schools.

**HR-104-HD-1**

Submitted on: 4/19/2023 1:31:33 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Camille Rios	Individual	Support	Written Testimony Only

Comments:

Aloha Chair David Tarnas and Vice Chair Gregg Takayama

My name is Camille Rios. I have lived next to the Puuloa firing range for 16 years. I am a mother of 3. This outdated range continues to be a detriment to the community and gets worse as the years go by. Even now, as I write this note at 7 am, gunshots ring out as my children prepare for school.

Several schools nearby regularly have to drown out the noise of gunshots coming from this range.

Given the current proliferation of gun violence nationwide, it's unsafe to have active shooters so close to the school. These children already practice active shooter drills in school. The gunfire only serves to traumatize them further.

The sea rider foundation has found outrageously high lead levels near the firing range. Reports show that lead contamination is 17 times higher than the state safety standard. This community actively uses the beach, shoreline, and ocean to fish, swim and play. The firing range is literally poisonous.

The community around the range has changed significantly since 1934. It's time to move it. There is no reason to have this range in the middle of a residential community.

Mahalo for taking the time to read my testimony.

**HR-104-HD-1**

Submitted on: 4/19/2023 5:30:21 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Dana Keawe	Individual	Support	Written Testimony Only

Comments:

STRONG SUPPORT.

**HR-104-HD-1**

Submitted on: 4/19/2023 10:16:01 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
sue hansen	Individual	Support	Written Testimony Only

Comments:

I am a legal professional and I work at home more and more and I currently work about 80% - 90% from home. My home is about 2-3 blocks from the shooting range. My work requires me to be on the phone, researching, writing and gathering and analyzing information. The sound of rapid gunfire not only jolts me from whatever that I'm working on but I am unable to continue with work again until the firing stops. While the guns are firing I cannot imagine anyone in this area who can feel relaxed or at ease or can work effectively. If you value the right to quiet enjoyment of your home, you will understand our pain and frustration.

My neighbors on both sides have a total of 7 small children and we worry about the lead in the sand and water that the kids play in every day. It is also not normal or healthy for kids to grow up with the sounds of gunfire every day.

More homes are being planned for Ewa Beach and more families and children will be adversely affected by the noise pollution and the environmental pollution that the shooting range brings.

We appreciate military training and readiness and we appreciate the military's contribution to the local economy. However, please relocate the shooting range away from homes and parks. The damage to the environment has already been done but it's not too late to do the right thing and stop the pollution and allow the good people of Ewa Beach to enjoy and have peace in their homes like everyone else in Hawai'i.

Thank you kindly for your consideration.



I am an Ewa Beach resident and live near Pu'uloa shooting range. Pu'uloa range is located in the middle of a densely populated neighborhood, in close proximity to schools, homes, and parks. The range poses numerous health and safety threats to Ewa residents, and the Navy should immediately relocate the range to a non-residential area of the island.

Similar to the calls to shut down Red Hill, HR104 represents the culmination of many years of significant concerns from residents coming to a breaking point.. This includes public health, safety, noise, and environmental concerns, including proposed destructive shoreline hardening, toxic levels of lead contamination in the soil within a few hundred feet of the beach park where hundreds of keiki play each week, potential off-range bullet migration, loud weapons firing, and a powerful PA system often operated in pre-dawn hours in violation of local laws. The proposed DHHL construction of approximately 600 homes for Native Hawaiians immediately adjacent to the range is also an imminent threat to mental and physical health.

No community should be subjected to the harmful chemical and noise pollution, and numerous other safety hazards produced by a military shooting range. Would the range be allowed in the middle of Manoa or Lanikai? Obviously not, and Ewa residents should be given the same priority for safety and health as every other community on the island! My family members served in the military and I support readiness. However, as the resolution points out, the military has ample land and options on Oahu and across the region to relocate the range to an area that does not threaten residents and the shoreline. Please pass HR104 and prioritize the health and safety of Ewa residents.

Liam Chinn

Ewa Beach Resident

**HR-104-HD-1**

Submitted on: 4/20/2023 4:02:48 AM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Chad Roe	Individual	Support	Written Testimony Only

Comments:

My name is Chad Roe. I have spent well over a decade of my adult life in Hawaii; a journey that started when I reported for active duty in the US Army to Wheeler Army Airfield. I met my wife here and we both deployed to combat twice from Hawaii, first to Afghanistan and later to Iraq. When our military service concluded we moved to the mainland but soon realized our hearts remained in the Hawaiian islands and we permanently returned over three years ago to raise our children here. We purchased a home near the end of Fort Weaver Rd in Ewa Beach in early 2019. Even as combat veterans, we were shocked upon moving in to experience the proximity to frequent gunfire in the middle of our residential neighborhood. Pu'uloa Range is completely out of place with the adjacent development that has happened in the many decades since it was first built. I served in our military. I understand the importance of our national defense. I have also witnessed firsthand the way military readiness can be held out as an excuse to violate reasonableness. I have trained on every military installation in the Hawaiian islands and I know without a doubt the military presently has access to land that could be used to create a suitable if not superior training facility to Pu'uloa. Our military prides itself on being flexible and adaptable to any circumstance. It is time to adapt and acknowledge the reality of firing machine guns and sniper rifles a football field distance away from families in their homes. Every day this range is operated harms our community, to say nothing of the environmental impact of lead leaching into the sand and ocean.

If the military truly wants to be the friendly neighbor and partner they claim to be, they will relocate this training facility to a more suitable location and return the land to the state of Hawaii to benefit the residents who have chosen to build a life here.

**HR-104-HD-1**

Submitted on: 4/20/2023 8:17:11 AM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Ingrid Yanez	Individual	Support	Written Testimony Only

Comments:

I am a resident of Ewa Beach who works from home and lives in the vicinity of the Pu'uloa Range Training Facility. I am also a mother of a child that has grown up in the schools located in the communities surrounding the range. Despite sound mitigation measures reportedly implemented by the US Marines, the noise from the firing range is a major impediment to the ability of both my son (and his school mates) and myself to concentrate and do our work. The noise often begins well before sun up and continues into the evening. I ask you to imagine what it is like to work with what is the equivalent of fireworks going off at your neighbor's house all day. It is extremely challenging.

In addition to the noise levels, the toxic levels of lead resulting from the range are poisoning the land, air, and water in the area, which include hundreds of residences and multiple community recreation areas. The berms of the range are located directly on the beach and adjacent to Pu'uloa Beach Park. International studies have shown lead from such berms can easily leach into local substrates and water bodies, while also becoming airborne with local winds.

Due to these and several other concerns, the Ewa Neighborhood Board #23 recently (29 March 2023) adopted a resolution (which passed unanimously) that called for the relocation of the range. I fully supported that resolution, as I do HR104.

My neighbors and I also strongly support US Marines and military preparedness, but are keenly aware such preparedness can be achieved by relocating the necessary activities to existing or new training facilities on Oahu. Although the Marines often put forth the argument for the ongoing operation of the Pu'uloa Range Training Facility s necessary because it represents the only known 1000-yard shooting range on the island and thus is essential for training, such a range could be established elsewhere on the island, thus eliminating the need for the ongoing use of a range situated in the middle of a densely populated community. Given that Ewa Beach is one of the fastest growing and rapidly evolving areas of the state, relocating the training facility is an important step to limit marginalization of this portion of Oahu and ensure equity across our island home.

I implore you to protect our residents, keiki, and kupuna by passing HR104 and urging the military to relocate the training facility to a more appropriate area on Oahu.

Mahalo,

Ingrid Yanez

**HR-104-HD-1**

Submitted on: 4/20/2023 1:50:26 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lu Ann Faborito	Individual	Support	Written Testimony Only

Comments:

As a 24 year resident of Ewa Beach, I agree with the relocation idea

**HR-104-HD-1**

Submitted on: 4/20/2023 4:22:03 PM

Testimony for JHA on 4/21/2023 2:00:00 PM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Jeannette Docuyanan	Individual	Support	Written Testimony Only

Comments:

I **SUPPORT** HR104 and know we can find a more suitable location for the important training the USMC needs that will end the harm to the public the Pu'uloa location causes.

Thank you

Jeannette Docuyanan

'Ewa Beach