



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

1750
CO
14 APR 2023

HAWAII STATE SENATE
THE THIRTY-SECOND LEGISLATURE
REGULAR SESSION OF 2023
COMMITTEE ON PUBLIC SAFETY AND INERGOVERNMENTAL AND MILITARY
AFFAIRS
Room 407
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 SENATE RESOLUTION 138

Honorable Members of the Senate Committee on Public Safety and Intergovernmental and
Military 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 Senate Resolution 138. Enclosed in this letter is feedback from myself and my staff regarding the content of SR138. 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 or 808-257-1397.



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

THE SENATE
THIRTY-SECOND LEGISLATURE, 2023
STATE OF HAWAII

S.R. NO. 138

SENATE RESOLUTION

URGING THE UNITED STATES MARINE CORPS TO RELOCATE ALL LIVE FIRE TRAINING AND AVIATION ACTIVITY AWAY FROM PUULOA RANGE TRAINING FACILITY.

WHEREAS, the facility now known as Puuloa Range Training Facility was transferred from the United States Army to the United States Navy between 1915 and 1916; and

WHEREAS, during the Vietnam era, the facility supported long-range sniper training until the training was moved in 1979 to what is now called Marine Corps Base Hawaii, in Kaneohe; and This is misleading. Sniper training took place at both PRTF and Kaneohe between 1979 and 2011. However, the Marine Corps still lacked the required "known distance" 1,000 yard range which was established in 2011 at PRTF.

WHEREAS, after the sniper training exercises were relocated to Kaneohe, Iroquois Point was connected to Ewa Beach via an access road mauka of the training facility, allowing TheBus to service Iroquois Point; and

REQUEST "after the sniper training exercises were relocated to Kaneohe" be removed. This is not accurate. 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. Residency at Iroquois Point shifted from military only to both military and civilian tenants. In conjunction with this privatization, the use of an on-base road was no longer appropriate due to common military installation security practices.

WHEREAS, in 2011, the Marine Corps doubled the length of Puuloa Range Training Facility's Alpha Range, the range closest to the Ewa Beach community, and re-established sniper training at the facility, without seeking community input or conducting an environmental assessment; and

While technically accurate, this statement 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

ENCLOSURE (1): MCBH FEEDBACK TO THE PROPOSED SENATE RESOLUTION 138

produce an increase in noise when compared to other weapons training at PRTF.

WHEREAS, the expansion of the range and reinstatement of sniper training forced the closure of the access road and termination of TheBus service to Iroquois Point, eliminating a tsunami evacuation route; and

This is a mis-characterization of what happened and what currently exists. 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, since the reinstatement of sniper training at Puuloa Range Training Facility, the facility's public address system and shooting exercises have prompted hundreds of noise complaints from the surrounding community; and

REQUEST "since the reinstatement of sniper training at Puuloa Range Training Facility," be deleted as it is not accurate. The speaker system used during training and referenced above is used for Annual Rifle Qualifications on Bravo range. The speaker use being heard by residents is not connected to the sniper training on the Alpha Range located closer to the community. MCBH is currently pursuing a more efficient speaker system that will utilize multiple smaller speakers next to shooter positions which will mitigate the noise heard in the community.

WHEREAS, the United States Marine Corps recently announced that Puuloa Range Training Facility will be used as a night landing zone for the Marine Corps' helicopters, which will significantly increase noise pollution outside of the facility's regular 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, persistent noise pollution, like that experienced by residents who live near the training facility, can cause hearing loss, increase the risk of miscarriages or low birth

ENCLOSURE (1): MCBH FEEDBACK TO THE PROPOSED SENATE RESOLUTION 138

weight, and can cause or exacerbate cardiovascular disease, type two diabetes, sleep disturbances, mental health impairments, childhood learning delays, and other health, developmental, and behavioral issues; and

WHEREAS, the open-air ranges at Puuloa Range Training Facility also create the risk of a stray bullet, ricochet, or an accidental weapons discharge impacting nearby schools, churches, homes, and parks; and

The safety measures, training limitations, and infrastructure implemented at PRTF thoroughly ensure 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, in 2020, range gunfire was mistaken for an active shooter situation, causing lockdowns at nearby schools; 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, environmental studies of the area surrounding Puuloa Range Training Facility have shown lead contamination that is more than seventy times the legal limit; and

This statement is not factual. The legal limit applies when lead is in the environment in proximity to human habitation. This 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, not in the area 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

ENCLOSURE (1): MCBH FEEDBACK TO THE PROPOSED SENATE RESOLUTION 138

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 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, environmental studies have also found that there is a high risk of munitions constituents, materials originating from unexploded ordnance, migrating to nearshore waters, adjacent parks, and nearby homes; and

Please see the above response. This is not accurate, there have been no studies that show this happening at PRTF. In fact, the sampling outline in the study being cited in the resolution shows normal lead levels in all areas tested that are located outside of PRTF's boundaries.

WHEREAS, the Department of Hawaiian Home Lands recently announced the planned construction of approximately six hundred homes for Native Hawaiians on land directly adjacent to the Puuloa Range Training Facility; and

Pu'uloa Range Training Facility is an existing facility in the area. Marine Corps Base Hawaii is more than willing to work with the State of Hawaii 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 reside in these homes will disproportionately bear the risks of noise pollution, environmental pollution, and the possibility of stray gunfire unless the United States Marine Corps relocates shooting exercises and aviation activity and carries out environmental remediation; and

WHEREAS, the First Responder Campus in Mililani and Camp Blaz sniper training facility on Guam are currently under construction, offering possible alternatives for military and non-military training; 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

ENCLOSURE (1): MCBH FEEDBACK TO THE PROPOSED SENATE RESOLUTION 138

7,000 active duty Hawaii based Marines can complete their required Annual Rifle Qualification.

WHEREAS, alternatively, the United States Marine Corps could relocate sniper training to Marine Corps Base Hawaii, as it did in 1979; 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, the United States Marine Corps' plan to move four of Puuloa Range Training Facility's firing ranges inland to help mitigate coastal erosion does not adequately address the community's concerns about environmental harm, noise pollution, and the dangers associated with the facility's open-air ranges; now, therefore,

In February of this year, MCBH began moving Foxtrot range 40 meters inland from the shoreline because of its proximity to areas 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.

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 relocate all live fire training and aviation activity away from Puuloa 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 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 Secretary of Defense, Commandant of the Marine Corps, and United States Marine Corps Forces Pacific Commander.

In order to ensure resolutions concerning Marine Corps Base Hawaii are received by the appropriate military commands and higher headquarters, it is recommended that to the distribution list include the following: Commandant of the 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, State Legislature of Hawai'i, Chairperson of the Board of Land and Natural Resources, Director of the Hawaii Department of Health, Mayor and members of the Honolulu City Council.

ENCLOSURE (1): MCBH FEEDBACK TO THE PROPOSED SENATE RESOLUTION 138

OFFERED
BY :

SR-138

Submitted on: 4/26/2023 2:05:10 PM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Alexander Gaos	Testifying for 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 Senate Resolution 138 (SR138) 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.

The need to relocate PRFT from its current location in the center of a residential community in Ewa Beach, to a more remote part of Oahu is well overdue. On 25 April 2023 the State House of Representatives unanimously passed a similar resolution (HR104), as did the ENB#23 on 29 2023. These resolutions, as well as SR138, represent the culmination of decades of community complaints and injustices that have reached a boiling point.

Negative impacts start with extreme noise pollution, which got worse in the early 2010s when PRTF was expanded to incorporate training previously undertaken at other ranges. In addition to incessant shooting that can literally go from sunup to sundown, PRTF uses a thunderous loudspeaker to coordinate live-fire drills that is often broadcasting orders well before sunrise. Hundreds of residences surround the range, some as close as 50 meters. Imagine being one of those residents and trying to work from home, or care for a young infant, or deal with PTSD, while the equivalent of a fireworks show is going off at your neighbor’s house.

Perhaps more importantly, a recent study revealed toxic lead contamination levels *17 times higher* than the state safety standard in the soils surrounding the PRFT berms. Dozens of scientific studies on shooting ranges around the country have shown that lead from shooting ranges commonly leaches into local substrates and water bodies, while also becoming airborne with local winds. The PRFT berms are located directly on the beach and adjacent to Pu‘uloa Beach Park, thus the lead presents a direct threat to thousands of community members that utilize the park, as well as local wildlife, including endangered monk seals and sea turtles. No amount of mitigation can eliminate this threat.

Furthermore, stray bullets from the range represent lethal threats to the community, and to airplanes using the Honolulu International Airport as flight paths are directly above the range’s

line of fire. All it would take is one mistaken lifting of a rifle muzzle to coincide with a plane's flight path to lead to a major catastrophe. According to current FAA airspace regulations, the PRTF could not legally be built in its current location and a similar range proposed for Guam was rejected in 2013 for having similar conditions.

Other issues abound; the expansion of the range in the 2010s cutoff an important Tsunami evacuation route, leaving only a single exit route for the entire community. The expansion also cut off a bus route that once connected Ewa Beach with the community at Kapilina Beach Homes. The range also prohibits Oahu residents from using the shoreline and waters fronting the range for recreation, eliminating significant recreational and cultural opportunities.

The Ewa Beach community recognizes the importance of military readiness and views the relocation of the range as an opportunity to improve readiness. PRTF is old, dilapidated, and outdated, so a new or renovated range in another area with the latest technologies would improve training opportunities.

PRTF was built in the early 1900s when the area was remote, but that is no longer the case. Currently, Ewa Beach is the fastest growing area of the state and the range's current location is simply not compatible with the surrounding community. Relocating PRFT also represents an important step to limit injustices to a portion of Oahu that has traditionally been marginalized, thus promoting equity across our island home.

Alexander R. Gaos, PhD

Member, Ewa Neighborhood Board #23

SENATE COMMITTEE ON PUBLIC SAFETY AND INTERGOVERNMENTAL AND MILITARY AFFAIRS

MAY 1, 2023

1:30 PM

Conference room 225

In **SUPPORT** of **HR138** Requesting the Relocation of ALL Live Fire and Aviation Activities away from the Pu'uloa Range Training Facility

Aloha Chair Waikai, Vice Chair Elefante, 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 SR138 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. None of these moves were evaluated for impact to the 'Ewa community. 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.

MCBH has yet to make public any of the results of their testing for lead and do not dispute any of the levels detected by the Surfrider Foundation. The USMC testified to the House JHA committee that they believe the lead concentration limits do not apply to them because PRTF is a military installation and that high levels of lead concentration are of no cause for concern. Citing erosion as their only concern

regarding off-range lead migration the USMC has moved an insignificant fraction of the total volume of contaminated soil at PRTF from the Foxtrot range. After sifting out large chunks of lead, the remaining contaminated soil will reportedly be repurposed on PRTF a mere 40 meters from the shoreline. The larger, unmitigable hazard is the catastrophic widespread disbursement of lead that will result from storm surge or tsunami inundation.



Current disposition of contaminated remains of Foxtrot impact berm.

MCBH spokespersons state no intention to address the threat of the overwhelming majority of contaminated soil which makes up the Alpha and Bravo long distance range impact berms.

In the recent Environmental Assessment for the “Shoreline Stabilization at Pu’uloa Range Training Facility, 2019”, MCBH evaluated the No-Action alternative, stating the following:

S.3.1 No-Action Alternative

Under the No-Action Alternative, the Proposed Action would not occur. The range complex would continue to be subjected to shoreline erosion from wave action associated with storms, sea-level rise, and potential seismic-wave events. These actions could eventually lead to erosion of the earthen berms along the seaward boundaries of the ranges, seawater intrusion into the ranges rendering them unusable, and increased potential for erosion and lead contamination of the beach and water.

Source: Shoreline Stabilization at Pu'uloa Range Training Facility Environmental Assessment (2019)

The 26 April Honolulu Star-Advertiser quoted a MCBH spokesperson, stating:

“There is no room to relocate the Bravo 600-yard firing range or the Alpha 1,000-yard firing range, **but there also is no current erosion threat**, McDonough said.”

Yet only recently, MCBH published the following statements in the Shoreline Stabilization at Pu'uloa Range Training Facility Environmental Assessment (2019) and Appendices:

USMC: “However, the shoreline at PRTF currently appears to have an increase in erosion fronting ranges A, B and F.”

USMC: “Sea level rise, passive flooding, wave flooding, and coastal erosion (collectively hereafter, sea level rise) are predicted to result in the retreat and loss of fast land at the PRTF.”

USMC “...if waves were to reach the berms as sea level rises and waves strike against the berms, with the added drawback that dirt from the berms would wash into the water, along with any potential items present in the berms, **such as lead.**”

WHICH IS IT?



Figure 8. Water during a King Tide event on 9 August 2018 reaching the vegetation fronting the elevated access road in front of the long-distance "B" range.

Source: Shoreline Stabilization at Pu'uloa Range Training Facility Environmental Assessment (2019)



Foxtrot range following a December 2019 Kona storm



Surfrider photo of Foxtrot range actively eroding into the wave wash zone. Soil tested from this point greatly exceeded legal limits.

Clearly off-range migration occurred in both of the above photos given soil tests taken from where the berm toes meet the sand. Contrary to MCBH persistent claims, the Surfrider Foundation did not take samples from the berms themselves, rather from the berm toes on the seaward side where the berms meet the sand or fast land. This was clearly illustrated by Surfrider at the presentation given to the Ewa Neighborhood board and attended by MCBH.



Children playing in the sand and surf a few hundred feet from the massive, contaminated berms.

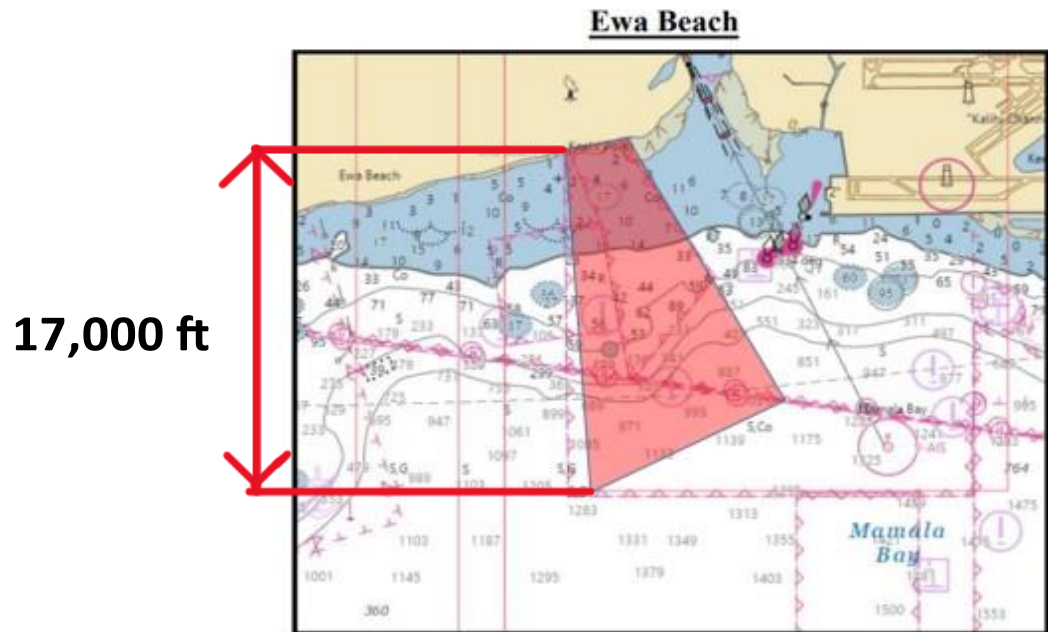
The Department of Hawaiian Home Lands (DHHL) recently announced a plan to construct 600 homes immediately adjacent to PRTF on the former Pacific Tsunami Warning Center parcel. The incompatibility issues and health and safety risks are certain to worsen and raise new issues with the addition of 600 Native Hawaiian families in a location incompatible with live firing of weapons of war. Native Hawaiians will be disproportionately impacted by all of the known hazards to the health and safety of the surrounding community. The off-limits nature of PRTF will deny Native Hawaiians of traditional hunting, gathering and cultural rights and undoubtedly worsen military community relations at a time when that relationship is most fragile.



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 range limits of the weapons typically fired at PRTF.

HORIZONTAL DANGER ZONE = 17,349 ft.



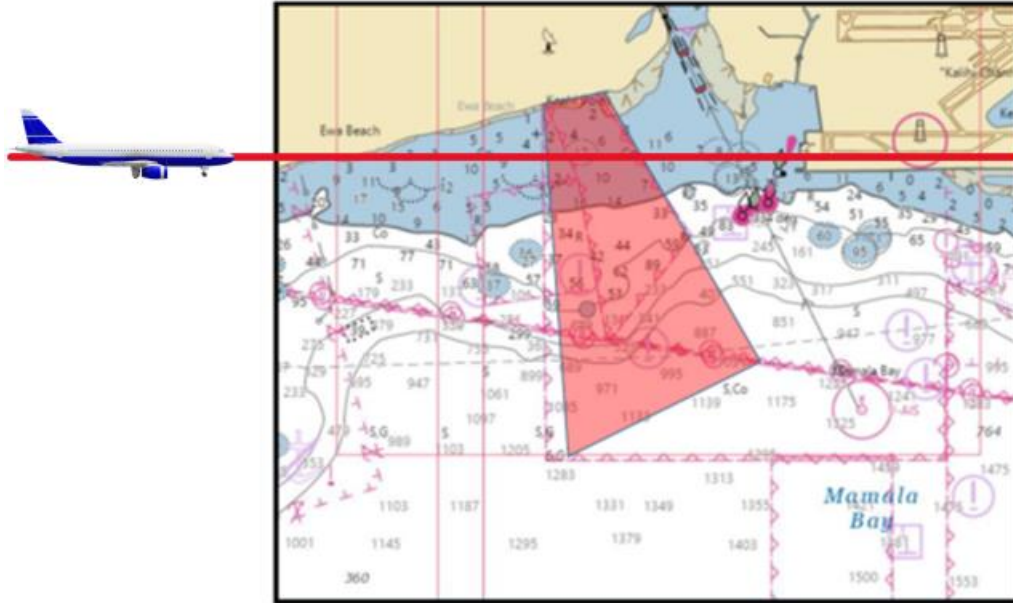
Source: USCG Notice to Mariners

VERTICAL DANGER ZONE FOR WEAPONS

TYPICALLY FIRED AT PRTF >2500'

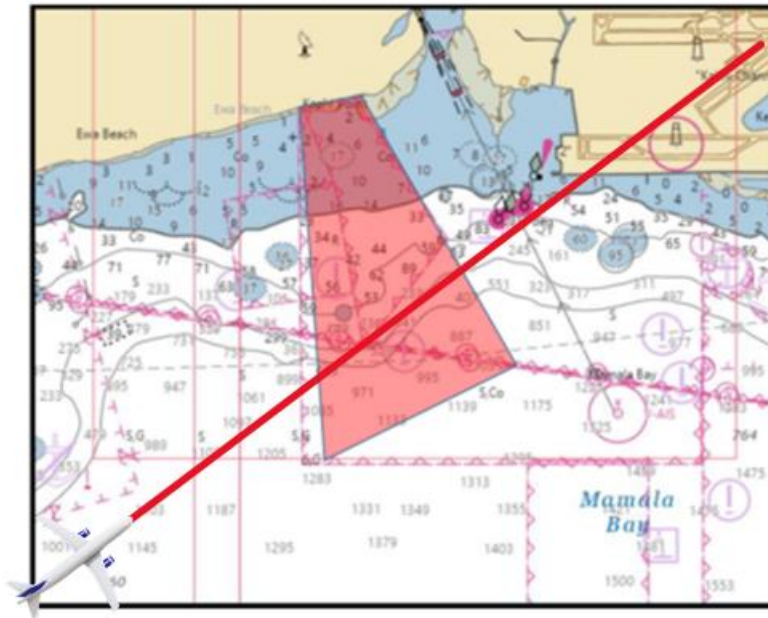
AIRCRAFT ALTITUDE WHEN PASSING OVER/IN FRONT OF PRTF is 600-900'

Ewa Beach



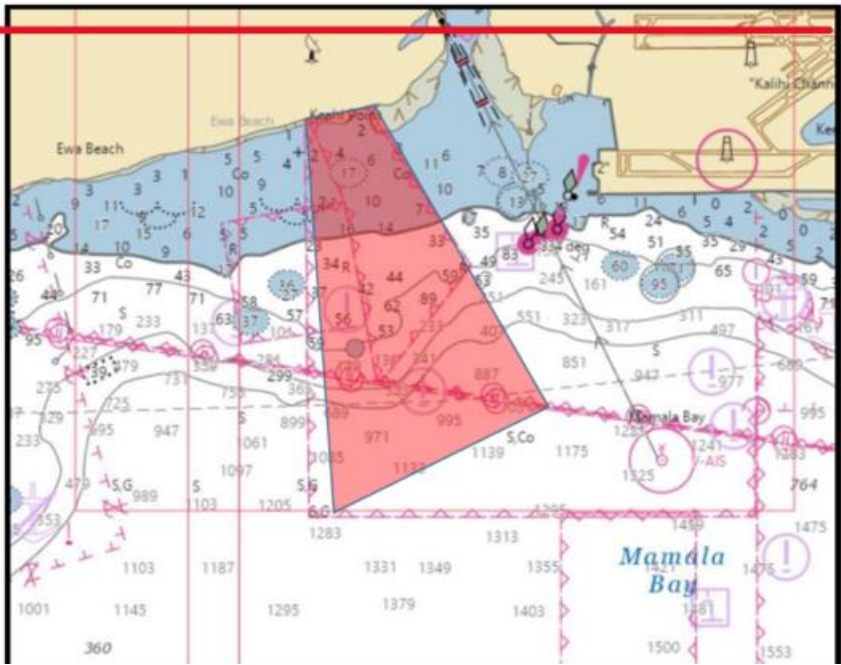
RWY 8R Flight Path

Ewa Beach



RWY 4L & 4R Flight Path

Ewa Beach



RWY 8L Flight Path

CONTINUED NEXT PAGE

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

MCBH describes the possibility of intentional directing of fire off-range as “...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.”

Experienced Ewa Beach surfers are well aware of the dangers of stray bullets from PRTF whizzing by them while in the water. It's hardly unprecedented.

Recall the Ft. Hood mass shooting in which 13 people were killed and 30 others injured. Considering unthinkable mass shootings occur with great regularity in our country, and that those training at PRTF are highly vulnerable to PTSD and suicidal tendencies, it would be foolish to believe something akin to the plethora of mass shootings we see with alarming frequency couldn't occur in an open range with aircraft, schools, homes, parks and churches well within range of the weapons fired daily at PRTF. It was only 2 miles away from PRTF and 2 years ago when a Sailor standing watch at Pearl Harbor Naval Station opened fire on shipyard workers before turning the weapon on himself injuring 3 and killing 2.

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.

MCBH claims "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."

The private status of Iroquois Pt housing might not eliminate a disaster evacuation route, but the concrete barriers at the gate will. It is implausible to expect removal of the concrete barriers rapidly enough to facilitate emergency use in a locally generated tsunami, major fire, or other disaster requiring rapid evacuation.



Given the litany of health and safety hazards PRTF poses to the community and flying public, and incompatibility with the surrounding community, 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, Schofield Barracks, etc.

I **SUPPORT** SR138 and strongly oppose all amendments requested by the USMC which would completely change the purpose of the resolution. The range is incompatible with the community and must relocate. That is the official position of the Ewa community as communicated by the Ewa Neighborhood Board and the State of Hawaii House of Representatives.

Michael Plowman

'Ewa Beach Resident

'Ewa Neighborhood Board member



April 27, 2023

The Surfrider Foundation is dedicated to the protection and enjoyment of the world's oceans, 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 SR138 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, supports 'Ewa Neighborhood Board agenda item 4.9, Resolution Regarding the Relocation of the Pu'uloa Rifle Range Facility and supports SR138. We appreciate your time and consideration.

Sincerely,

A handwritten signature in black ink that reads "Lauren Blickley". The signature is written in a cursive, flowing style.

Lauren Blickley
Hawai'i Regional Manager
Surfrider Foundation

SR-138

Submitted on: 4/26/2023 10:09:36 PM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Sandy Ward	Testifying for Hui o Ho`ohonua	Support	Written Testimony Only

Comments:

Dear Senators,

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 SR138. 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.

SR-138

Submitted on: 4/26/2023 9:13:53 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Romeo Labrador	Individual	Oppose	Written Testimony Only

Comments:

I oppose this bill

SR-138

Submitted on: 4/26/2023 9:14:46 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Chester ross	Individual	Oppose	Written Testimony Only

Comments:

I strongly oppose this bill.

SR-138

Submitted on: 4/26/2023 9:14:21 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Albert Yamanouchi Jr	Individual	Oppose	Written Testimony Only

Comments:

I strongly oppose

SR-138

Submitted on: 4/26/2023 9:15:06 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Floyd Domingo	Individual	Oppose	Written Testimony Only

Comments:

Strongly oppose this resolution

SR-138

Submitted on: 4/26/2023 9:15:32 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Mike Beazley	Individual	Oppose	Written Testimony Only

Comments:

Strongly oppose this resolution!

SR-138

Submitted on: 4/26/2023 9:18:27 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Brent Bennett	Individual	Oppose	Written Testimony Only

Comments:

I strongly oppose this SR138

SR-138

Submitted on: 4/26/2023 9:20:09 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Kenneth	Individual	Oppose	Written Testimony Only

Comments:

We strongly oppose this resolution.

SR-138

Submitted on: 4/26/2023 6:17:44 PM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Dereck Kaneshiro	Individual	Oppose	Written Testimony Only

Comments:

I oppose this bill

To Whom It May Concern,

I am 100% in favor of relocating the firing range at Pu'uloa. I live close to two miles away from the range. There are times when I can hear it. I can't imagine what it's like if you live close by. There is also the issue of lead contamination, both long and short term. There is also the danger to airplanes, surfers and the rest of the community

Sincerely,

Kenneth W. Lieu

91-619 Pohakupuna Rd. Unit A

Ewa Beach, Hi 96706

SR-138

Submitted on: 4/27/2023 9:06:49 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Camille Rios	Individual	Support	In Person

Comments:

Aloha

I am writing in support of SR138 URGING THE UNITED STATES MARINE CORPS TO RELOCATE ALL LIVE FIRE TRAINING AND AVIATION ACTIVITY AWAY FROM PUULOA RANGE TRAINING FACILITY.

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 detrimental to the community and worsens as the years go by. Even now, as I write this email 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 the 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.

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, SR138 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 SR138 and prioritize the health and safety of Ewa residents.

Liam Chinn

Ewa Beach Resident

SR-138

Submitted on: 4/27/2023 2:03:38 PM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Radhika Jit	Individual	Support	In Person

Comments:

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, SR138 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 SR138 and prioritize the health and safety of Ewa residents.

SR-138

Submitted on: 4/28/2023 7:19:51 PM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
jeannette plowman	Individual	Support	Written Testimony Only

Comments:

I strongly **SUPPORT** SR138 for the reasons outlined in the resolution, but especially for the reasons of health and safety. Please do not let the USMC make this into some sort of request for funding of new speakers. It's about unmitigable lead poisoning risk. It's about the danger of bullets leaving the un-baffled, open-air range. It's about Native Hawaiian hunting and gathering rights. And yes, the well-known health risks of incessant noise pollution.

The range is incompatible with its surroundings. Please Pass SR138 and help procure a training range for the USMC we can all be proud of.

SR-138

Submitted on: 4/29/2023 8:57:42 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Timothy Lee	Individual	Support	Written Testimony Only

Comments:

I SUPPORT SR138.

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 stated intentions ignore the largest contaminated berms and the risk posed by storm surge and tsunami inundation.

I SUPPORT SR138 and strongly oppose all amendments requested by the USMC which would completely change the purpose of the resolution. The range is incompatible with the community and must relocate. That is the official position of the Ewa community as communicated by the Ewa Neighborhood Board and the State of Hawaii House of Representatives.



COMMENTS WITH AMENDMENTS ON SR 138

URGING THE UNITED STATES MARINE CORPS TO RELOCATE ALL LIVE FIRE TRAINING AND AVIATION ACTIVITY AWAY FROM PUULOLOA RANGE TRAINING FACILITY.

Senate Committee on Public Safety and Intergovernmental and Military Affairs

The Honorable Glenn Wakai, Chair

The Honorable Brandon J.C. Elefante, Vice Chair

Monday, May 1, 2023 at 1:30 PM

Conference Room 225 & Videoconference

Chair Wakai, Vice Chair Elefante, and Members of the Committee:

The Hawaii Military Affairs Council ("MAC") **offers comments and amendments** on SR 138.

The Hawaii Military Affairs Council (MAC) was established in 1985 when the Chamber was appointed by the State to serve as the liaison to the military. The MAC advocates on behalf of Hawaii's military, and is comprised of business leaders, academic institutions, State and County officials, members of the CODEL, community leaders, labor unions and organizations and retired U.S. flag and general officers. The MAC works to support Hawaii's location as a strategic U.S. headquarters in the Indo-Asia-Pacific region which is crucial for U.S. national and homeland security.

The Pu'uola Range Training Facility (PRTF) has trained hundreds of thousands of Marines and other military branches in critical rifle and pistol skills that enable our service men and women to respond to our nation's call for many decades. One of the most basic skills is the ability to possess and maintain is marksmanship proficiency.

Over the years, housing developments have been established that have reduced the buffer areas. Operators of the PRTF have worked and continue to engage in close partnership with neighboring communities to mitigate potential impacts to the surrounding community, specifically those residing in close proximity to the range. Mitigation of noise impacts has led to changes in operation, equipment direction, and scheduling based on community input. MAC will



work with the Marines to implement new technologies to further reduce noise and related impacts.

We respectfully disagree with some of the assertions made in the resolution, and we request that actionable and measurable BE IT RESOLVED clauses be clarified by amending the following:

~~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~~

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 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

Thank you for the opportunity to offer comments on this matter.

SR-138

Submitted on: 5/1/2023 7:55:57 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Mikiala Lidstone	Testifying for Ulu A'e Learning Center	Support	In Person

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 for 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 SR138 to relocate Pu'uloa Shooting Range.

SR-138

Submitted on: 4/30/2023 3:55:54 PM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Karen Luke	Individual	Support	Written Testimony Only

Comments:

Aloha Chairman Wakai, Vice Chair Elefante, and Members of Committee,

To succeed in the continuing development of our unique community with walkable shorelines, natural beauty, and strong sense of place, I'm asking for your favorable consideration of SR 138.

I live a little over a mile away from the Pu'uloa Rifle Range. The neighborhood and the rifle range have grown since I moved here 30 years ago. These activities are not compatible. It is distressing to hear the words "live firing" blasted constantly on the PA system announcing to people trespassing in a restricted area—a live firing range. Our people have the right to walk below the vegetation line.

I've learned from these public hearings that the Marines want to harden the shoreline with a wall, and due to coastal erosion lead contamination is 70 times over the accepted public health levels for residential areas. Clearly the Marines need to construct and manage a new shooting range that doesn't harm our environment, and clean up the lead waste leaching into the karst from spent ammunition accumulated over 100 years at Pu'uloa to avoid another Red Hill incident.

Your favorable consideration to SB138 would be very much appreciated.

Mahalo,

Karen Luke

Ewa Beach Road

SR-138

Submitted on: 5/1/2023 6:23:31 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Raiza Dalofin	Individual	Support	Written Testimony Only

Comments:

Support

SR-138

Submitted on: 5/1/2023 7:45:11 AM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Lavinia Tatofi	Individual	Support	Written Testimony Only

Comments:

I support this resolution.

SR-138

Submitted on: 5/1/2023 12:38:45 PM

Testimony for PSM on 5/1/2023 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Julie Reyes Oda	Individual	Support	Written Testimony Only

Comments:

I support this resolution.