

NORTHWESTERN HAWAIIAN ISLANDS CORAL REEF ECOSYSTEM RESERVE  
**RESERVE ADVISORY COUNCIL**

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*Native Hawaiian Elder*

**Pelika Andrade**

*Native Hawaiian*

**Kainalu Steward**

*Native Hawaiian*

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*Ocean Related Tourism*

**Rick Hoo**

*Recreational Fishing*

**Mark Hixon**

*Research*

**Don Schug**

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*Research*

Government (Non-Voting)

**Eric Roberts**

*Papahānaumokuākea MNM*

**Kim Hum**

*HIHW National Marine Sanctuary*

**Malia Chow**

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**Joshua DeMello**

*WESPAC*

**Emily Hauck**

*US Navy*

**Maile Norman**

*US Coast Guard*

**Peter Thomas**

*Marine Mammal Commission*

Naval Facilities Engineering Command Pacific

Attention: HCTT EIS/OEIS Project Manager

258 Makalapa Drive, Suite 100

Pearl Harbor, HI 96860-3134

January 29, 2024

RE: SCOPING FOR ENVIRONMENTAL IMPACT STATEMENT/OVERSEAS ENVIRONMENTAL IMPACT STATEMENT FOR THE UNITED STATES DEPARTMENT OF THE NAVY'S HAWAII CALIFORNIA TRAINING AND TESTING

To Whom it May Concern:

We write to you as the Northwestern Hawaiian Island Coral Reef Ecosystem Reserve Advisory Council (RAC) to provide comments regarding scoping for the United States Department of the Navy's Draft Hawaii-California Training and Testing (HCTT) Environmental Impact Statement/Overseas Environmental Impact Statement. The RAC is an advisory group to the Office of National Marine Sanctuaries consisting of representatives from various stakeholder groups, governmental agencies, and Native Hawaiian representatives. It includes fishing, business, conservation, science, education, and Kupuna interests.

On January 29, 2024, the RAC had a meeting at which time the preparation of the HCTT Environmental Impact Statement/Overseas Environmental Impact Statement (EIS/OEIS) was discussed.

Full compliance with the National Environmental Policy Act ("NEPA"), 42 U.S.C. 4321 et seq., is vital to ensuring that marine mammals and other marine life are protected from unnecessary harm. As Congress intended when it passed NEPA, the U.S. Navy is required to employ rigorous standards of environmental review, including a comprehensive analysis of all practical alternatives, a full explanation of potential impacts, a reasonable and objective accounting of cumulative impacts, and a thorough description of mitigation measures that will significantly lessen environmental impacts.

The RAC requests the following to be included in a Cumulative Impact Analysis:

- Assessment of the impacts of deep sea mining
- Take of marine mammals by foreign vessels involved in military training
- Assessment of areas where impacts have occurred in the past or are likely to occur to help inform future potential impacts
- Impacts on Native Hawaiian cultural resources and connection to the ocean
- NHPA Section 106 Consultation with Native Hawaiians, see 36 CFR §800.4(c)(1)
- Discussion on marine debris and related impacts such as increased entanglement, and unexploded ordnance removal, including that of all participants included in the exercise

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The RAC requests a review of these proposed areas as smaller subdivisions for evaluation. For example, the Southern California area differs from the Hawaiian archipelago in terms of impact and mitigation needed.

These are just a few examples of issues for consideration and reassessment, and are in no way comprehensive.

Thank you for your consideration of this matter. We look forward to receiving detailed information on the EIS.

Sincerely,



Linda Paul  
Chair, Reserve Advisory Council

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*The Council is an advisory body to the Reserve/NOAA Monument superintendent. The opinions and findings of this document do not necessarily reflect the position of the Reserve, the Monument, or the National Oceanic and Atmospheric Administration.*