

From: [Wayne Anno](#)
To: [DLNR.BLNR.Testimony](#)
Cc: mokaouiwi@outlook.com
Subject: [EXTERNAL] Submission of Written Testimony in support of Retention of Pohakuloa Training Area
Date: Friday, April 25, 2025 7:12:58 AM
Attachments: [ANNO SUPPORT LETTER 4 \(Econ Ben to HI County\).pdf](#)
[ANNO SUPPORT LETTER 1 \(TRAINING CULTURAL ENVIRONMENT\).pdf](#)
[ANNO SUPPORT LETTER 2 \(PRC-Pacific Encroachment\).pdf](#)
[ANNO SUPPORT LETTER 3 \(HIARNG TRAINING\).pdf](#)

To the Chairperson and Members of the Board,

Attached are my written testimonies supporting the retention of Pohakuloa Training Area (PTA) for military training purposes.

I am a retiring member of the Hawaii Army National Guard (HIARNG) and I have been to PTA numerous times over the course of my thirty (30) years as a member of the HIARNG.

PTA provides a realistic field training environment (terrain, weather, physical and psychological endeavors) to prepare service members to perform their duties overseas or domestically to support the State of Hawaii and our Nation.

In this era of great power competition, crisis - and hopefully not conflict, our service members of the Active Duty, Reserve, and National Guard require a large scale training area to prepare them when called upon to protect and serve our State and Nation.

Please consider my inputs to retain PTA.

Mahalo.

Very Respectfully,

Wayne Anno

Mr. Wayne Anno
91-1042 Nanahu Street
Kapolei, Hawaii 96707
Primo2442@gmail.com
808-398-0556
April 21, 2025

Ms. Dawn N.S. Chang
Chairperson
Board of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Subject: Support for Army Land Retention of Pōhakuloa Training Area

Dear Ms. Dawn N.S. Chang and Members of the Board,

I am writing to express my strong support for the Army's continued land retention of the Pōhakuloa Training Area (PTA) on Hawai'i Island. As a concerned citizen, advocate for responsible land management, and a retiring member of the Hawaii National Guard, I believe that PTA plays a crucial role in our national security, cultural preservation, and environmental stewardship.

Military Training and National Security: PTA allows our armed forces to conduct essential training exercises, ensuring our military readiness and preparedness.ⁱ It also allows our Hawaii National Guard to train to be prepared to respond to natural disasters or hazardous events that impact the people of the State of Hawaii. Retaining this land is vital for maintaining our national security and for the safety of the people of Hawaii.

Cultural Resources Management: PTA's rich cultural heritage deserves protection, and the Army's commitment to compliance and sustainability through its Integrated Cultural Resources Management Plans is laudableⁱⁱ. USAG-PTA's Cultural Resources team conducts archaeological surveys of sitesⁱⁱⁱ and monitor more than 35 archaeological sites for effects from troops and hoofed mammals, or ungulates, such as pigs and goats. The Cultural Resources team also preserves and ensures the protection of cultural shrines, habitation caves, burial sites, and pictographs that date as far back as the 15th century.^{iv}

Environmental Stewardship: PTA's 23,000 acres are home to diverse ecosystems, and the Army's efforts to minimize adverse environmental impacts are crucial for future generations. In 2023, PTA was selected as one of 13 Military installations across the entire Department of Defense for the 2023 Readiness and Environmental Protection Integration (REPI) Challenge. This 2.6-million-dollar project (1.3 provided by REPI funds and 1.3 million in partner contributions^v) was for the Nāpu'u Natural Resource Protection to mitigate rare plant impacts at PTA.^{vi}

In conclusion, I wholeheartedly support the Army's continued presence at Pōhakuloa Training Area. The Army's continuing partnership with the State of Hawaii in balancing military training, cultural preservation, and environmental stewardship, ensures a sustainable future for this vital piece of land for the Army and for the People of Hawaii.

Thank you for your attention to this matter. I trust that you will consider the long-term benefits of Army retention of PTA for our nation, the people of Hawaii, and the environment.

Sincerely,

ANNO.WAYNE.JOHN
HN.1179764829
Mr. Wayne Anno

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ANNO.WAYNE.JOHN.1179764829
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Date: 2025.04.21 14:10:24 -10'00'

ⁱ <https://www.usarpac.army.mil/Our-Story/Our-News/Article-Display/Article/3276591/training-lands-and-infrastructure-top-secretary-of-the-armys-visit-to-phakuloa/>

ⁱⁱ <https://aec.army.mil/preserve/ICRMP>

ⁱⁱⁱ <https://www.dvidshub.net/image/3324806/archaeologists-preserve-cultural-resources-pohakuloa-training-area>

^{iv} https://www.army.mil/article/55428/usag_hi_fellows_learn_about_ptas_natural_cultural_resources

^v <https://dlnr.hawaii.gov/blog/2023/01/30/nr23-16/>

^{vi} <https://www.dvidshub.net/news/437581/pohakuloa-training-area-receives-department-defense-2023-repi-challenge-funding>

Mr. Wayne Anno
91-1042 Nanahu Street
Kapolei, Hawaii 96707
April 21, 2025

Ms. Dawn N.S. Chang
Chairperson
Board of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Subject: Letter of Support for Army Land Retention at Pōhakuloa Training Area (PTA).

Dear Ms. Dawn N.S. Chang and Members of the Board,

I am writing to express my strong support for the U.S. Army's proposal to retain state-owned leased lands at Pōhakuloa Training Area (PTA) on the island of O'ahu, Hawai'i. While some residents may argue that the Army's presence in Hawaii exposes the state to foreign threats, I firmly believe that retaining Army training land is critical for Hawai'i's economic stability and security against further encroachment by the People's Republic of China (PRC) into the Pacific Ocean.

China's existing encroachment and devastating fishing practices: China's activities in Vanuatu and Tonga highlight the potential risks^{i,ii}. In Vanuatu, the PRC built a wharf at Luganville with a non-transparent agreement involving an \$80 million loan, placing Vanuatu in a financially precarious situation due to high debtⁱⁱⁱ. Similarly, PRC-funded projects in Tonga threaten the future of the Pacific nation^{iv}. These developments give the PRC control over these ports and unrestricted fishing access with their large fleet, which employs destructive practices that harm the Pacific Ocean's ecosystem^{v,vi}. The PRC's extensive trawler operations indiscriminately catch marine life, causing significant ecological damage and posing a threat to Hawai'i's fishing industry, local seafood culture, and tourism sector^{vii}.

Benefit of Army Retention of Training Land: Maintaining strong diplomatic relations and security cooperation with our allies keeps the PRC at bay and it depends on Joint international partnerships and bilateral and multinational military training. Successful relationships with Japan, South Korea, Indonesia, Singapore, Taiwan, Philippines, New Zealand, and Australia rely on our ability to conduct joint military exercises both in Hawai'i and at designated training areas. United States diplomatic relations and security cooperation with our partners and allies in the Pacific is key to limiting the reach of PRC's fishing trawlers into the Pacific.^{viii} Army retention of PTA is critical for maintaining these relationships with our allies and partners.

Thank you for your attention to this matter. Please feel free to contact me if you require any additional information or clarification.

Sincerely,

ANNO.WAYNE.JO
HN.1179764829

Digitally signed by
ANNO.WAYNE.JOHN.1179764829
Date: 2025.04.21 14:12:06 -10'00'

Mr. Wayne Anno

ⁱ <https://www.theguardian.com/world/2018/apr/11/baseless-rumours-why-talk-of-a-chinese-military-installation-in-vanuatu-misses-the-point>

ⁱⁱ <https://www.rnz.co.nz/international/programmes/datelinepacific/audio/2018639928/claims-china-wants-vanuatu-wharf-for-a-naval-base>

ⁱⁱⁱ <https://www.rnz.co.nz/international/pacific-news/386924/vanuatu-s-luganville-wharf-geopolitically-risky-report>

^{iv} <https://www.hawaiipublicradio.org/national-international/2019-07-10/chinas-largesse-in-tonga-threatens-future-of-pacific-nation>

^v <https://hongkongfp.com/2022/03/12/how-chinas-fishing-fleet-is-devastating-ecosystems-harming-poor-countries-and-contributing-to-conflict/>

^{vi} <https://ipdefenseforum.com/2021/06/chinese-fishing-fleet-poses-threat-to-pacific-island-economies/>

^{vii} <https://www.civilbeat.org/2021/05/hawaiis-fisherman-are-worried-about-chinas-fleet-so-is-the-military/>

^{viii} <https://ndupress.ndu.edu/Media/News/News-Article-View/Article/3197281/pivoting-the-joint-force-national-security-implications-of-illegal-unregulated/>

Mr. Wayne Anno
91-1042 Nanahu Street
Kapolei, Hawaii 96707
Primo2442@gmail.com
808-398-0556
April 21, 2025

Honorable Dawn N.S. Chang
Chairperson
P.O. Box 621
Honolulu, Hawaii 96809

Subject: Support for Army Retention of Pōhakuloa Training Area

Dear Honorable Chang and Members of the Board,

I am writing to express my strong support U.S. Army retention of the Pōhakuloa Training Area (PTA). PTA has played a vital role in military training since World War IIⁱ in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercisesⁱⁱ, and live-fire drills.ⁱⁱⁱ If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.^{iv}

As a resident of Hawai'i and retiring member of the Hawaii National Guard, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard.

High Altitude and desert like conditions: The high altitude, and desert like conditions of PTA provides rigorous training experiences that prepares our troops for this type of environment across the world. Similar terrain can be found in Asia, portions of Southeast Asia, West Africa, and the Middle East region where hybrid warfare threats to the United States of America exist.

Critical for the Hawai'i Army National Guard: PTA played and continues to play a critical role in training our own Hawai'i Army National Guard Troops. PTA was very instrumental in preparing our Guardsman for their deployments to Iraq and Afghanistan from 2004-2013, and 2023.^v Training at PTA was also critical for our Hawai'i Guardsmen in preparation for their 2019 deployment to the Sinai in Egypt and to Kosovo. Under presidential orders, the Hawai'i Army National Guard continues to deploy our Hawai'i Soldiers across the world, with 8 Soldiers to West Africa in support of Operation Juniper Shield^{vi} in 2023, and the 2-641 Aviation Regiment deployment to the Middle East in support of Operation Enduring Freedom - Spartan Shield in 2024.^{vii} By retaining this land, we can continue to support our Hawai'i National Guard in ensuring that our Guardsman have the best training in preparation for their deployments in these operational contingencies and combat zones.

Thank you for your attention to this matter. I trust that you will carefully consider the importance of Army Retention of the Pōhakuloa Training Area as it provides critical training conditions necessary for our Hawai'i Army National Guard - "Hawai'i's Own".

Sincerely,

ANNO.WAYNE.JOHN
HN.1179764829
Wayne Anno

Digitally signed by
ANNO.WAYNE.JOHN.1179764829
Date: 2025.04.21 14:12:43 -10'00'

ⁱ Koehnen, F. J. (2015). *Been There Done That Back to Hilo*. Hilo, Hawaii, United States of America: Lyman Museum and Mission House, (143,144)

ⁱⁱ <https://www.dvidshub.net/image/8098598/jpmrc-24-01>

ⁱⁱⁱ <https://www.dvidshub.net/image/6533705/range-qualification-and-training-pohakuloa-training-area>

^{iv} https://www.army.mil/article/269078/pta_continues_to_draw_dignitaries_due_to_critical_mission_in_the_pacific

^v <https://dod.hawaii.gov/blog/main/hawaii-army-national-guard-units-notified-about-upcoming-deployments/>

^{vi} <https://www.staradvertiser.com/2024/01/10/hawaii-news/hawaii-national-guardsmen-to-join-west-africa-operation/>

^{vii} <https://www.dvidshub.net/image/8267343/2nd-641st-aviation-soars-into-deployment-support-spartan-shield>

Mr. Wayne Anno
91-1042 Nanahu Street
Kapolei, Hawaii 96707
Primo2442@gmail.com
808-398-0556
Date: April 21, 2025

Board of Land and Natural Resources
Attention: Dawn N.S. Chang, Chairperson and members of the board
1151 Punchbowl Street, Room 130
Honolulu, HI 96813

Dear Chairperson Chang,

I am writing to express my strong support for the Army's retention of the Pohakuloa Training Area (PTA) on Hawaii Island. This training area is not only vital for military readiness but also provides significant benefits to Hawaii County and its residents.

Firstly, PTA employs a dedicated team of civilian personnel who contribute to the smooth operation and maintenance of the facility. The Directorate of Public Works alone supervises 10 staff members responsible for maintaining over 400 real property assets, including roads, fire breaks, and fencing. These civilian jobs are crucial for the local economy and provide stable employment opportunities for residents.

Additionally, the US Army Corps of Engineers awards various contracts to manage non-military operations at PTA. These contracts encompass a broad range of services, from construction projects to professional services, fostering local business growth and bolstering the county's economic stability. Specifically, these contracts include the maintenance and repair of roadways for range operations, as well as environmental and cultural resource management. Residents of Hawaii Island are frequently employed to carry out these contracts, which also benefit local businesses, such as a trucking company responsible for transporting water to PTA.

Furthermore, PTA also plays a critical role in emergency management for Hawaii County. Through a Memorandum of Agreement (MOA), PTA first responders assist Hawaii County Police and Fire departments during emergencies. This collaboration has proven invaluable during natural disasters, such as volcanic eruptions, where PTA's resources and personnel have helped mitigate traffic hazards and respond to civilian accidents. The partnership between PTA and local emergency services ensures the safety and well-being of Hawaii County residents.

In conclusion, Army retention of Pohakuloa Training Area is essential for the continued economic and emergency management benefits it provides to Hawaii County. I urge the

Board of Land and Natural Resources to support the Army's request to retain this vital training area.

Thank you for your consideration.

Sincerely,

ANNO.WAYNE.JOHN
.1179764829

Digitally signed by
ANNO.WAYNE.JOHN.1179764829
Date: 2025.04.21 14:09:50 -10'00'

Wayne Anno

From: [Laura Bearden](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: I Demand that BLNR Reject the U.S. Army's Pohakuloa FEIS
Date: Thursday, May 1, 2025 10:13:24 AM

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (“PTA”) on Hawai‘i Island.

This FEIS fails to meet the basic requirements of Hawai‘i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the drafting process, the Army’s final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include, but are not limited to:

1. Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents with no clear plan or commitment for abatement or cleanup.
2. The Army’s failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers. Communities on Hawai‘i Island heavily rely on the water from aquifers. The risk of contaminating these aquifers is a serious matter.
3. The Army’s lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
4. The Army’s failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
5. No cumulative impact analysis of the full 132,000-acre PTA operation was provided by the Army, which artificially narrows the scope of environmental review.
6. There are ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile native species like the Palila.
7. The Army’s provision of incomplete greenhouse gas data while it makes unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai‘i’s lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I implore you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,

Laura Bearden, Esq.

Honolulu, O'ahu and Nīnole, Hawai'i Island

laurabeardenvideos@gmail.com

From: [Maistosoatisis Boyle](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: We Demand BLNR to Reject the U.S. Army's Pohakuloa FEIS
Date: Wednesday, April 30, 2025 9:46:06 PM

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am a Blackfeet Native American adopted into the Papakōlea homestead standing in solidarity with Kanaka Maoli.

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai‘i Island.

This FEIS fails to meet the basic requirements of Hawai‘i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.
- A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.
- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.
- Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.
- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai‘i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,

Maistosoatsis Boyle

Honolulu, O‘ahu

From: [Josie Brody](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] We Demand BLNR to Reject the U.S. Army's Pohakuloa FEIS
Date: Thursday, May 1, 2025 11:49:59 AM

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai‘i Island.

This FEIS fails to meet the basic requirements of Hawai‘i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.
- A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.
- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.
- Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.
- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai‘i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,
Jocelyn Brody
He‘eia O‘ahu
josiebrody@gmail.com

From: [Benedict Fuata](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Army Retention of Pōhakuloa Training Area (PTA)
Date: Thursday, May 1, 2025 12:44:09 PM
Attachments: [BLNR Spt for USA Retention of PTA B Fuata.pdf](#)

To: Board of Land and Natural Resources
Attn: Dawn N.S. Chang, Chairperson, and Members of the Board

Aloha Chair Chang and Members of the Board,

Attached to this email is the Veterans of Foreign Wars, Department of Hawai'i's formal letter of endorsement in support of the U.S. Army's continued retention and use of the Pōhakuloa Training Area (PTA).

We respectfully submit this document for your review, consideration, and approval.

Should you have any questions or require further information, please feel free to contact me directly:

Benedict L. Fuata

Commander
Veterans of Foreign Wars, Department of Hawai'i
438 Hobron Lane, Suite 407
Honolulu, HI 96815
bfuata@yahoo.com
(808) 339-4414

Mahalo for your time and attention to this important matter.

Respectfully,

BEN FUATA
COMMANDER
Veterans of Foreign Wars, Department of Hawai'i
Accredited Veteran Service Officer
VA ACCREDITATION #: 45391
Email: bfuata@yahoo.com
Cell - (808) 339-4414
Polynesian Pride ~ "Where Veterans Matter Most!"



VETERANS OF FOREIGN WARS

**Veterans of Foreign Wars Department of Hawaii
438 Hobron Lane, Suite 407 - Honolulu, HI 96815**

Benedict L. Fuata
P.O. Box 7196
Hilo, Hawai'i 96720
bfuata@yahoo.com
(808) 339-4414

April 30, 2025

Board of Land and Natural Resources
Attn: Dawn N.S. Chang, Chairperson and Members of the Board
1151 Punchbowl Street, Room 130
Honolulu, Hawai'i 96813

Subject: Support for the U.S. Army's Retention of Pōhakuloa Training Area

Dear Chairperson Chang and Members of the Board,

As Commander of the Veterans of Foreign Wars, Department of Hawai'i, and a lifelong resident of this state, I write to express my full and unwavering support for the Army's continued retention of the Pōhakuloa Training Area (PTA) on Hawai'i Island. Beyond its strategic military value, PTA is a critical asset to our local economy, emergency response infrastructure, and national defense posture in the Pacific.

PTA serves as a premier training environment, uniquely suited to prepare our military—including the Hawai'i Army National Guard—for operations across diverse and often hostile environments. Its high-altitude terrain and expansive space enable realistic, joint-service exercises that cannot be replicated elsewhere in the state. Retaining PTA directly contributes to our national security and ensures our Soldiers are combat-ready when called upon.

Equally important, PTA supports the Hawai'i Island community through direct employment and contract opportunities. Civilian personnel assigned to the Directorate of Public Works play an essential role in maintaining over 400 real property assets, including roads, fire breaks, and perimeter fencing. These jobs provide local residents with stable, meaningful employment and support families in our rural communities.

In addition, the U.S. Army Corps of Engineers regularly awards contracts for infrastructure maintenance, construction, cultural resource protection, and environmental stewardship at PTA. Many of these contracts are fulfilled by local businesses and residents—such as the water transport company contracted to service the facility—creating ripple effects that strengthen Hawai'i County's economic resilience.

PTA also plays an indispensable role in public safety. Under a formal Memorandum of Agreement, PTA first responders assist Hawai'i County Police and Fire departments during natural disasters and emergencies. From volcanic eruptions to severe weather incidents, PTA



VETERANS OF FOREIGN WARS

**Veterans of Foreign Wars Department of Hawaii
438 Hobron Lane, Suite 407 - Honolulu, HI 96815**

personnel have stood side-by-side with our local first responders, helping to manage traffic, support evacuations, and save lives. This partnership enhances our island's overall readiness and emergency response capacity.

In summary, the Army's retention of Pōhakuloa Training Area is not only in the interest of national defense—it is also vital to the social and economic well-being of Hawai'i Island and its residents. On behalf of the more than 6,000 members of the Veterans of Foreign Wars in Hawai'i, I respectfully urge this board to approve the continued military use of PTA.

Thank you for your attention to this matter and for your ongoing commitment to balancing the needs of our environment, communities, and national security.

Sincerely,

**BENEDICT L. FUATA
COMMANDER**

Veterans of Foreign Wars, Department of Hawai'i

From: [Benedict Fuata](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Army Retention of Pōhakuloa Training Area (PTA)
Date: Thursday, May 1, 2025 12:53:04 PM
Attachments: [BLNR Spt Ltr for PTA Chairperson Chang B Fuata.pdf](#)

Aloha Chairperson Dawn Chang DLNR State of Hawai'i,

Attached to this email is the Veterans of Foreign Wars, Department of Hawai'i's formal letter of endorsement in support of the U.S. Army's continued retention and use of the Pōhakuloa Training Area (PTA).

We respectfully submit this document for your review, consideration, and approval.

Should you have any questions or require further information, please feel free to contact me directly:

Benedict L. Fuata

Commander
Veterans of Foreign Wars, Department of Hawai'i
438 Hobron Lane, Suite 407
Honolulu, HI 96815
bfuata@yahoo.com
(808) 339-4414

Mahalo for your time and attention to this important matter.

Respectfully,

BEN FUATA
COMMANDER
Veterans of Foreign Wars, Department of Hawai'i
Accredited Veteran Service Officer
VA ACCREDITATION #: 45391
Email: bfuata@yahoo.com
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Polynesian Pride ~ "Where Veterans Matter Most!"



VETERANS OF FOREIGN WARS

**Veterans of Foreign Wars Department of Hawaii
438 Hobron Lane, Suite 407 - Honolulu, HI 96815**

April 30, 2025

Chairperson Dawn Chang
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, Hawai'i 96809

Dear Chairperson Chang,

I write to express my strong and unwavering support for the continued U.S. Army retention of the Pōhakuloa Training Area (PTA). As the Commander of the Veterans of Foreign Wars, Department of Hawai'i, and as a proud resident of our islands, I understand firsthand the critical importance of PTA to our national security and the preparedness of our Armed Forces—especially the Hawai'i Army National Guard.

Since World War II, PTA has been an indispensable asset in preparing our troops for combat missions across the Pacific and beyond. Its unique landscape—high altitude, open desert-like conditions, and realistic terrain—mirrors many operational environments our forces face today, including regions in Southeast Asia, West Africa, and the Middle East. This makes PTA not just a training site, but a power projection platform and a combat multiplier in the Pacific theater.

PTA is vital for joint exercises, live-fire training, and mission rehearsal scenarios that cannot be replicated elsewhere in Hawai'i. Our Hawai'i Army National Guard has relied heavily on this facility to ensure mission readiness. From 2004 to 2013, and again in 2023, PTA played a pivotal role in preparing our Guardsmen for deployments to Iraq and Afghanistan. Likewise, it was instrumental in readying our troops for missions in the Sinai Peninsula and Kosovo, and most recently, for deployments to West Africa in support of Operation Juniper Shield (2023) and to the Middle East in support of Operation Enduring Freedom – Spartan Shield (2024).

With the continued and increasing operational demands placed on our Hawai'i Army National Guard, maintaining PTA is not just beneficial—it is essential. Without it, our ability to train and deploy Soldiers from Hawai'i would be significantly degraded, putting their safety and mission success at risk.



VETERANS OF FOREIGN WARS

Veterans of Foreign Wars Department of Hawaii
438 Hobron Lane, Suite 407 - Honolulu, HI 96815

I respectfully urge you and the State of Hawai'i to support the Army's retention of the Pōhakuloa Training Area. Its strategic location and unique training environment are irreplaceable. Supporting our Soldiers with the tools and terrain they need to prepare for combat is not only a matter of military readiness, but a moral obligation to those we send into harm's way.

Thank you for your consideration.

Respectfully,

BENEDICT L. FUATA
COMMANDER

Veterans of Foreign Wars, Department of Hawai'i

From: [Jake El Hajji](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on U.S. Army Pohakuloa FEIS
Date: Thursday, May 1, 2025 8:43:48 AM

Aloha Chair Case and Members of the Board of Land and Natural Resources,
I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai‘i Island.

This FEIS fails to meet the basic requirements of Hawai‘i's environmental review laws and does

not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army’s final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.
- A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.
- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.

- Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.

- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai‘i’s lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation

plan. Although I don't live on the Island of Hawai'i, as a paddler, surfer, and avid hiker, I am deeply troubled by the threat the U.S. Army's complete disregard for the waters and forests of Hawai'i, as well as the shameful deflection of responsibility that they have and continue to show for their actions.

Sincerely,

Jacob El Hajji

Honolulu, HI

Jacobelhajji411@gmail.com

RECEIVED

April 22, 2025

2025 APR 30 AM 8:08

The Honorable Archie Hapai, III
P.O. Box 413
Kurtistown, HI 96760
No email
808-825-1917

DEPT. OF LAND
& NATURAL RESOURCES
STATE OF HAWAII

Dawn N.S. Chang, Chairperson
Hawaii Board of Land and Natural Resources
P.O. Box 621
Honolulu, HI 96809

Subject: Support for Army Retain of Pōhakuloa Training Area

Dear Board of Land and Natural Resources,

I am writing to express my strong support of U.S. Army retention of the Pōhakuloa Training Area (PTA). PTA has played a vital role in military training since World War IIⁱ in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercisesⁱⁱ, and live-fire drills.ⁱⁱⁱ If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.^{iv}

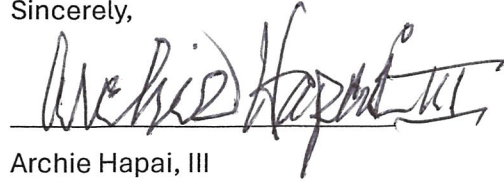
I served honorably in the Hawai'i House of Representatives after being elected in 1972, representing the 5th District. I am a Vietnam War Veteran and served over 25 years combined in the Army and Hawai'i Army National Guard and am currently a Trustee of the Veterans of Foreign Wars, serving as a Commander for Post 3830 in Pahoa. As a resident of Hawai'i, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard.

High Altitude and desert like conditions: The high altitude and desert like conditions of PTA provide rigorous training experiences that prepare our troops for this type of environment across the world. Similar terrain can be found in Asia, portions of Southeast Asia, West Africa, and the Middle East region where hybrid warfare threats to the United States of America exist.

Critical for the Hawai'i Army National Guard: PTA played and continues to play a critical role in training our own Hawai'i Army National Guard Troops. PTA was very instrumental in preparing our Guardsman for their deployments to Iraq and Afghanistan from 2004-2013, and 2023.^v Training at PTA was also critical for our Hawai'i Guardsmen in preparation for their 2019 deployment to the Sinai in Egypt and to Kosovo. Under presidential orders, the Hawai'i Army National Guard continues to deploy our Hawai'i Soldiers across the world, with 8 Soldiers to West Africa in support of Operation Juniper Shield^{vi} in 2023, and the 2-641 Aviation Regiment deployment to the Middle East in support of Operation Enduring Freedom - Spartan Shield in 2024.^{vii} By retaining this land, we can continue to support our Hawai'i National Guard in ensuring that our Guardsman have the best training in preparation for their deployments in these operational contingencies and combat zones.

Thank you for your attention to this matter. I trust that you will carefully consider the importance of Army Retention of the Pōhakuloa Training Area as it provides critical training conditions necessary for our Hawai'i Army National Guard - "Hawai'i's Own".

Sincerely,

A handwritten signature in black ink, appearing to read "Archie Hapai, III". The signature is written in a cursive, stylized font with a horizontal line underneath it.

Archie Hapai, III

Former Hawai'i State Representative, 5th District

ⁱ Koehnen, F. J. (2015). *Been There Done That Back to Hilo*. Hilo, Hawaii, United States of America: Lyman Museum and Mission House, (143,144)

ⁱⁱ <https://www.dvidshub.net/image/8098598/jpmrc-24-01>

ⁱⁱⁱ <https://www.dvidshub.net/image/6533705/range-qualification-and-training-pohakuloa-training-area>

^{iv} https://www.army.mil/article/269078/pta_continues_to_draw_dignitaries_due_to_critical_mission_in_the_pacific

^v <https://dod.hawaii.gov/blog/main/hawaii-army-national-guard-units-notified-about-upcoming-deployments/>

^{vi} <https://www.staradvertiser.com/2024/01/10/hawaii-news/hawaii-national-guardsmen-to-join-west-africa-operation/>

^{vii} <https://www.dvidshub.net/image/8267343/2nd-641st-aviation-soars-into-deployment-support-spartan-shield>

Kealalio, Kanani

From: Mau Ha <maeh4126@gmail.com>
Sent: Thursday, May 1, 2025 9:15 AM
To: DLNR.BLNR.Testimony
Subject: [EXTERNAL] Testimony: We demand BLNR to reject the U.S. Army Pohakuloa FEIS

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island. This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.
- A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.
- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.
- Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.
- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.
- This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation

Sincerely

Mau Ha

Nelson M. Kunitake
P.O. Box 189
Mt View, HI 96771
nelsonmklk@gmail.com
808 895-8258
April 21, 2025

RECEIVED

2025 APR 24 AM 8:14

DEPT. OF LAND
& NATURAL RESOURCES
STATE OF HAWAII

Honorable Dawn N.S. Chang
Chairperson, BLNR
P.O. Box 621
Honolulu, HI 96809

Subject: Support for Army Retain of Pōhakuloa Training Area

Dear Ms. Chang,

I am writing to express my strong support U.S. Army retention of the Pōhakuloa Training Area (PTA). PTA has played a vital role in military training since World War IIⁱ in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercisesⁱⁱ, and live-fire drills.ⁱⁱⁱ If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.^{iv}

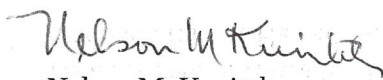
As a resident of Hawai'i, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard.

High Altitude and desert like conditions: The high altitude, and desert like conditions of PTA provides rigorous training experiences that prepares our troops for this type of environment across the world. Similar terrain can be found in Asia, portions of Southeast Asia, West Africa, and the Middle East region where hybrid warfare threats to the United States of America exist.

Critical for the Hawai'i Army National Guard: PTA played and continues to play a critical role in training our own Hawai'i Army National Guard Troops. PTA was very instrumental in preparing our Guardsman for their deployments to Iraq and Afghanistan from 2004-2013, and 2023.^v Training at PTA was also critical for our Hawai'i Guardsmen in preparation for their 2019 deployment to the Sinai in Egypt and to Kosovo. Under presidential orders, the Hawai'i Army National Guard continues to deploy our Hawai'i Soldiers across the world, with 8 Soldiers to West Africa in support of Operation Juniper Sheild^{vi} in 2023, and the 2-641 Aviation Regiment deployment to the Middle East in support of Operation Enduring Freedom - Spartan Shield in 2024.^{vii} By retaining this land, we can continue to support our Hawai'i National Guard in ensuring that our Guardsman have the best training in preparation for their deployments in these operational contingencies and combat zones.

Thank you for your attention to this matter. I trust that you will carefully consider the importance of Army Retention of the Pōhakuloa Training Area as it provides critical training conditions necessary for our Hawai'i Army National Guard - "Hawai'i's Own".

Sincerely,



Nelson M. Kunitake

ⁱ Koehnen, F. J. (2015). *Been There Done That Back to Hilo*. Hilo, Hawaii, United States of America: Lyman Museum and Mission House, (143,144)

ⁱⁱ <https://www.dvidshub.net/image/8098598/jpmrc-24-01>

ⁱⁱⁱ <https://www.dvidshub.net/image/6533705/range-qualification-and-training-pohakuloa-training-area>

^{iv} https://www.army.mil/article/269078/pta_continues_to_draw_dignitaries_due_to_critical_mission_in_the_pacific

^v <https://dod.hawaii.gov/blog/main/hawaii-army-national-guard-units-notified-about-upcoming-deployments/>

^{vi} <https://www.staradvertiser.com/2024/01/10/hawaii-news/hawaii-national-guardsmen-to-join-west-africa-operation/>

^{vii} <https://www.dvidshub.net/image/8267343/2nd-641st-aviation-soars-into-deployment-support-spartan-shield>

From: [Jess Kēhau Lucas](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: We Demand BLNR to Reject the U.S. Army's Pōhakuloa FEIS
Date: Wednesday, April 30, 2025 8:30:59 PM

Aloha Chair Case and Members of the Board of Land and Natural Resources,

My name is J. Kēhau Lucas and I am writing from Wailuku, Maui to strongly urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army to continue occupying 22,750 acres of public trust lands at Pōhakuloa Training Area (PTA) on Hawai‘i Island.

This FEIS does not meet the standards required by Hawai‘i's environmental review laws nor the fiduciary duties of the State under the public trust doctrine. Numerous issues raised in public comments during the Draft EIS phase remain unresolved, and significant scientific data has been withheld or ignored. Here are key findings supported by publicly available research:

1. Confirmed Toxic Contamination with No Remediation Plan

A 2018 lawsuit filed by KAHEA and other community members led to a Hawai‘i Circuit Court ruling that the state had not properly monitored or enforced its lease with the U.S. Army, including contamination risks. The Army has admitted to the presence of lead, depleted uranium (DU), and other toxic munitions constituents on-site, but the FEIS lacks a comprehensive cleanup or mitigation plan ([State of Hawai‘i v. U.S. Army, Civil No. 14-1-0304]).

2. Inadequate Groundwater and Soil Testing

According to the Army's own reports, munitions-related contamination poses significant risks to groundwater through porous lava substrates found on Hawai‘i Island. Yet, no comprehensive groundwater monitoring network is in place at PTA. Hydrologist Dr. Tom Giambelluca has warned of the heightened vulnerability of Hawai‘i’s aquifers due to shallow, fast-flowing systems — meaning contamination could quickly reach drinking water sources.

3. Lack of Transparency and Withholding of Operating Procedures

The Army has declined to release its Standard Operating Procedures, limiting independent and public review of its contamination control strategies. The State Auditor in 2013 criticized DLNR for “lax oversight” and insufficient record-keeping regarding military leases on conservation land ([Audit of DLNR Special Land and Development Fund, Report No. 13-01]).

4. Cumulative Impacts Not Assessed

The FEIS only reviews 22,750 acres under lease, ignoring broader impacts of the entire 132,000-acre PTA site. This segmentation undermines the environmental review process and fails to account for cumulative impacts across the ecosystem, as required by both HRS Chapter 343 and NEPA standards.

5. Human Health and Cultural Practice Risks

Nearby communities and cultural practitioners risk exposure to toxic dust and soil. A study by Dr. Lorrin Pang (M.D., MPH) and others has shown that particulate matter from DU can be inhaled or ingested and pose long-term health risks, particularly when burned or disturbed.

6. Increased Wildfire Threats

According to Army data, over 1,000 fires have occurred at PTA since the 1970s. These fires threaten fragile native ecosystems and endangered species like the Palila, which depend on intact dryland forest habitats.

7. Misleading or Missing Climate Data

The FEIS includes broad claims about minimal climate impacts but lacks detailed greenhouse gas (GHG) assessments. In fact, military activities are among the largest institutional sources of GHG emissions globally — a 2019 study from Lancaster and Durham Universities found the U.S. military is a larger emitter than many industrialized nations.

Given these unresolved and serious environmental, legal, and ethical deficiencies, I urge you to **reject the Army's FEIS and** require a full, independent, and legally compliant environmental review that includes public access to data, genuine community engagement, and a credible cleanup and mitigation plan.

Mahalo for your time and consideration.



From: [Shannon Marvel](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony regarding BLNR to Reject the U.S. Army's Pohakuloa FEIS
Date: Thursday, May 1, 2025 2:19:19 PM

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to **reject the Final Environmental Impact Statement (FEIS)** submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island.

This FEIS **fails to meet the basic requirements of Hawai'i's environmental review laws** and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- **Confirmed toxic contamination** of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—**with no clear plan or commitment for cleanup.**
- A failure to conduct **comprehensive soil and groundwater testing**, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.
- **Lack of transparency**, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- **Failure to assess human health risks**, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- **No cumulative impact analysis** of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.
- **Acknowledged ongoing fire risks**, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.
- **Incomplete greenhouse gas data**, while making unsupported claims about climate impacts.

This FEIS does **not meet the legal or ethical standards** for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to **reject this FEIS** and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Respectfully,

Shannon Marvel

Kea'au, Hawai'i Island
shannon.marvels@gmail.com

April 23, 2025

Wayne T. Nishijima
377 Huali mPl
Hilo, HI 96720
waynen377@yahoo.com
808-961-6555

Honorable Dawn N.S. Chang, Chairperson
Board of Land and Natural Resources
P.O. Box 621
Honolulu, HI 06809

Subject: Support for Army Retain of Pōhakuloa Training Area

Dear Chairperson Chang:

I am writing to express my strong support U.S. Army retention of the Pōhakuloa Training Area (PTA). PTA has played a vital role in military training since World War IIⁱ in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercisesⁱⁱ, and live-fire drills.ⁱⁱⁱ If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.^{iv}

I was born in Lahaina, Maui and have been living in Hilo, Hawai'i since 1979. I am a Vietnam War and Hawaii Army National Guard Veteran. I have spent countless days and weeks training at the Pōhakuloa Training Area to maintain ourselves and our unit's readiness to fulfill our readiness whenever called to active duty. We always made sure that we treated the training area with respect and made sure we didn't leave any trash behind and left it as clean or cleaner than we found it. Without PTA we would not have adequate training areas in Hawai'i to maintain our readiness. It is crucial to the Hawai'i National Guard and other military services in Hawaii to maintain and have access to this valuable training area.

As a resident of the Big Island of Hawai'i, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard.

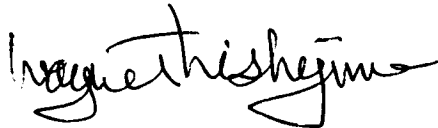
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to deploy our Hawai'i Soldiers across the world, with 8 Soldiers to West Africa in support of Operation Juniper Shield^{vi} in 2023, and the 2-641 Aviation Regiment deployment to the Middle East in support of Operation Enduring Freedom - Spartan Shield in 2024.^{vii} By retaining this land, we can continue to support our Hawai'i National Guard in ensuring that our Guardsmen have the best training in preparation for their deployments in these operational contingencies and combat zones.

Thank you for your attention to this matter. I trust that you will carefully consider the importance of Army Retention of the Pōhakuloa Training Area as it provides critical training conditions necessary for our Hawai'i Army National Guard - "Hawai'i's Own".

Sincerely,



Wayne T. Nishijima

ⁱ Koehnen, F. J. (2015). *Been There Done That Back to Hilo*. Hilo, Hawaii, United States of America: Lyman Museum and Mission House, (143,144)

ⁱⁱ <https://www.dvidshub.net/image/8098598/jpmrc-24-01>

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^{iv} https://www.army.mil/article/269078/pta_continues_to_draw_dignitaries_due_to_critical_mission_in_the_pacific

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^{vi} <https://www.staradvertiser.com/2024/01/10/hawaii-news/hawaii-national-guardsmen-to-join-west-africa-operation/>

^{vii} <https://www.dvidshub.net/image/8267343/2nd-641st-aviation-soars-into-deployment-support-spartan-shield>

April 25, 2025

Delbert M. Nishimoto
584 Ka'anini Street
Hilo, Hawai'i, 96720
nishieast888@gmail.com
808-935-8719

Honorable Dawn N.S. Chang, Chairperson
Board of Land and Natural Resources
P.O. Box 621
Honolulu, HI 06809

Subject: Support for Army Retain of Pōhakuloa Training Area

Dear Chairperson Chang:

I am writing to express my strong support U.S. Army retention of the Pōhakuloa Training Area (PTA). PTA has played a vital role in military training since World War IIⁱ in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercisesⁱⁱ, and live-fire drills.ⁱⁱⁱ If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.^{iv}

I am writing in behalf of the Big Island National Guard Retirees Association, an organization of over 100 members, on the Big Island of Hawai'i dedicated to serve the past, current and future members of the Hawai'i National Guard.

As a resident of the Big Island of Hawai'i, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard.

High Altitude and desert like conditions: The high altitude, and desert like conditions of PTA provides rigorous training experiences that prepares our troops for this type of environment across the world. Similar terrain can be found in Asia, portions of Southeast Asia, West Africa, and the Middle East region where hybrid warfare threats to the United States of America exist.

Critical for the Hawai'i Army National Guard: PTA played and continues to play a critical role in training our own Hawai'i Army National Guard Troops. PTA was very instrumental in the train-up and preparing our Guardsman for their deployments to the Republic of South Vietnam in the 1968 to 1969 reserve component call-up. PTA provided an effective training site helping to improve the performance of soldiers and units. I am a 100 per cent disabled veteran, with a service connected injury from Vietnam. PTA helped me to better resist the adverse effects of continuous operations and ability to maintain self-control and to think when exhausted and learn to cope and recognize the problem of situational decision making.

Thank you for your attention to this matter. I trust that you will carefully consider the importance of Army Retention of the Pōhakuloa Training Area as it provides critical training conditions necessary for our Hawai'i Army National Guard - "Hawai'i's Own".

Sincerely,

Delbert M. Nishimoto

RECEIVED

April 25, 2025

2025 MAY -1 AM 8:09

Delbert M. Nishimoto
584 Ka'anini Street
Hilo, Hawai'i, 96720
nishieast888@gmail.com
808-935-8719

DEPT. OF LAND
& NATURAL RESOURCES
STATE OF HAWAII

Honorable Dawn N.S. Chang, Chairperson
Board of Land and Natural Resources
P.O. Box 621
Honolulu, HI., 96809

Subject: Support for Army Retain of Pōhakuloa Training Area

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Sincerely,



Delbert M. Nishimoto

From: [Hot Pocket](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for the FEIS renewal
Date: Thursday, May 1, 2025 12:38:53 PM

Aloha Chair Case and Members of the Board of Land and Natural Resources,
I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai‘i Island.

This FEIS fails to meet the basic requirements of Hawai‘i's environmental review laws and does

not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army’s final document raises more red flags, avoids key questions, and withholds critical data.

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- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
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- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

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I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,

Jean Luke Prentice
Kapaau, Big Island
jonlukeprentice@gmail.com

Michael Reimer, Ph.D.
13961 W 83rd Pl
Arvada, Co 80005
GeoMike5@att.net
April 28, 2025

RECEIVED

2025 MAY -1 AM 10:11

DEPT. OF LAND
& NATURAL RESOURCES
STATE OF HAWAII

Dawn N. S. Chang, Esq. Chairperson
State of Hawai'i Board of Land and Natural Resources
DLNR Main Office
Kalanimoku Building
1151 Punchbowl St.
Honolulu, HI 96813
Ph: (808) 587-0400
dlnr@hawaii.gov

Dear Chairperson Chang:

Although there does not appear to be a formal means to comment on the Final EIS, I am compelled and pleased to provide comments to address what I deem to be critical shortcomings and bias of the final EIS on ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA; FINAL ENVIRONMENTAL IMPACT STATEMENT; VOLUME I: EIS DOCUMENT; PŌHAKULOA TRAINING AREA, ISLAND OF HAWAII, HAWAII, April 2025.

The Final EIS continues many of the fatal flaws of the second draft of the Environmental Impact Statement that would otherwise clearly indicate the best action is the no action alternative. Most notably, the EIS has a propensity to be less than thorough in objectively evaluating other alternatives by claiming comments and suggestions that do not address their preferred action are not relevant. The EIS development team could conveniently label any comment as non-substantive when it provided information for an alternative that was not the Army's preferred action.

The Final EIS addressed some of the comments I provided to the second draft on May 28, 2024. One concern I expressed was the retention of toxins at PTA that could contaminate areas well outside the boundaries of PTA. One toxin was depleted uranium oxides that are present and can be transported vast distances in the wind from the training use of the Davy Crockett tactical atomic weapon in the 1960s. The response was a dismissal of that concern saying that the Army had conducted an airborne particulate study in 2009 and no depleted uranium was found. The preparers of the Final EIS apparently did not vet this claim but accepted the Army mantra to downplay any risk. The 2009 study did not look for depleted uranium. There is a vast

health risk difference between natural uranium in crystalline matrix of a rock and a solid particle of depleted uranium. A respiratory-size particle of nearly insoluble depleted uranium oxide can reside in the lung for years bombarding adjacent cells with scores of highly energetic alpha particles. Radiation can act as both a promoter and initiator of cancer and even with a long latency period should not be so summarily dismissed as a non-risk from depleted uranium. While it is completely understandable why the Army downplays risks from residual toxins at PTA because cleanup would interfere with its war-training mission, there are reasonable actions that can be taken to reduce the risks. One such action would be not to renew the lease at PTA and minimize the land area from which toxins can and have been released. There are other toxins used at PTA that prevent health risks. PFAS, previous burn pan usage, and lead from firing ranges are some examples. Regular attention to cleanup and restoration would have reduced those risks and should be mandated for any future activities.

Another issue is the reasons given for several categories considered in justification of the lease are frivolous and are easily remedied. Specifically, a comparison of potential environmental impacts was given for 15 categories in final EIS table ES-3. Only the no action alternative had 3 positive evaluations compared to just 2 for other action alternatives. In contrast, the no action alternative had 3 significant adverse impact ratings compared to just 2 for the other action alternatives. The 3 significant adverse impact ratings were assigned objectively based assumptions that have no credibility in fact. Those categories are biological resources, socioeconomics, and utilities.

The rating for biological resources was based on the presumption that the Army is the best protector of the land and that the County or State cannot provide adequately for protection of the biological resources. I find such an implication absolutely ludicrous and demeaning of the County abilities. That is one of the prime objectives of the DLNR. In fact, when the land is removed from Army continuing occupation and damage related to training is ended, it is likely to become a refuge for endangered species. To claim that the land and species would be destroyed by overhunting is insolent by assuming the State or County does not have the skills to provide those protections. Another reason given against the no action alternative in section 3.3.5.4 is remedied with the simple granting of rights-of-way access to the remaining Army-owned facilities providing access to non-contiguous parcels of Army owned land. Biological resources should be given a significant beneficial impact rating as it would provide positive benefits to the State, County, and the Army. This also positively impacts and reinforces the no action alternative for cultural, socioeconomic, and utilities resources.

On socioeconomics, while it may, on first glance, seem financially beneficial to have a military presence, a thorough and comprehensive cost-benefit analysis with public input would be needed to realistically evaluate that scenario. I recall a claim by the military in a previous draft EIS on another issue that they contributed \$12 billion a year to the state. But that claim did not include either a detailed breakdown of how that money was distributed for the State's economic benefit or what was lost by their "taking." A cost-benefit analysis would be helpful. A major issue to be included in the cost-benefit analysis would be to recover a fair lease charge for the use of this land at PTA. Comparable to industrial or commercial use, that financial return for the approximate 23,000 acres could be in the range of \$10 million to \$100 million per year. This return should go to the County of Hawai'i and I hope the State would recognize that ethical right. This is but a minor fraction of the \$12 billion claimed contribution and would provide substantial relief to the resident taxpayers in deriving the County budget. Therefore, the socioeconomic no action alternative should properly be assigned a significant beneficial impact rating. Training at PTA would continue on other adjacent lands, rights of way between Army-owned parcels could be negotiated, the same civilian workforce could be employed, contractor actions would actually increase as new facilities are built and cleanup of the leased land is undertaken. The charade for the forced adverse impact of the socioeconomic claim is found in Section 3.6.10.4, Mitigation Measures, where it is stated that "The No Action Alternative does not include proposed Army actions, so no mitigation measures are recommended for the significant impacts." In other words, the Army is pleased to not give the no action alternative full and deserving evaluation. Criteria listed in section 3.10.5 are merely subjective and without substantiated merit. Simply granting rights of way would eliminate what appear to be forced reasons against the no action alternative in section 3.10.6.4, still provide for cultural oversight by the County and State, allow upgraded construction with no loss in personnel, and negate the veiled threat to no longer provide first responder assistance to the County in times of emergency.

Utilities is the third adverse impact rating for the no action alternative. The fact that the no action alternative is given an adverse significant impact rating is in direct contrast to the statement in 3.15.6.4, "The elimination of ongoing activities in the State-owned land, activities in the impact area and training ranges to the south of the State-owned land, and associated activities in the U.S. Government-owned land would reduce utility demand, resulting in new long-term, minor, beneficial impacts on U.S. Government-owned and non-U.S. Government-owned utilities that would still exist or be accessible such as potable water, fire protection water, wastewater, solid waste, liquid fuel, and communications." This is not only a beneficial impact for the County, but to the State, the public, and the Army. By relocating utilities as needed, the Army would

gain waste facilities that are up to code in a faster time frame. In addition, the Army has been considering upgrading other utilities and facilities for some time and this would provide it the opportunity to begin such upgrades immediately, thus protecting even the government owned land from excessive toxification. Rights of way through state-owned land could be granted for access to current utilities (as well as providing connectivity to training areas) and the persistent threat to not provide cooperative services can be overcome. As noted above, contractor expenditures would likely increase giving a better socioeconomic standing to the County. Therefore, the utilities no action alternative should be given a less than significant impact rating and, considering the statement above in section 3.15.6.4, should easily qualify for a significant beneficial impact rating.

There is another major issue to be considered that was not in the drafts or final EIS as it has become relevant after their preparation but must now be included for n. That is the current federal administration and Department of Defense is showing very little interest in funding cultural and environmental issues. Therefore, it is in the best interest of the County and the State to not renew the lease for the State-owned land. Those cultural, environmental, and even social issues that were promoted as being provided and relevant to lease renewal are now moot and the best alternative for the benefit of the County and State is not to renew the lease and let it resort, with the exception for rights of way, to another land use classification, perhaps a conservation classification.

By assigning the positive significant ratings properly deserved to these categories, the no action alternative then rightfully appears as the best alternative for the benefit of the Army, State, and County.

Sincerely,

A handwritten signature in cursive script that reads "Michael Reimer".

Michael Reimer, Ph.D.
GeoMike5@att.net

Timothy T. Spencer
86-309 Puuhulu Place
Waianae, HI. 96792
Email: Spe05@hotmail.com
Ph#: 808-341-8502
25APR25

Honorable Dawn N. S. Chang
Chairperson
Department of Land and Natural Resources
Honolulu, Hawaii 96813

Subject: Support for Army Retention of Pōhakuloa Training Area

Dear Ms Chang,

I am writing to express my strong support for the U.S. Army retention of the Pōhakuloa Training Area (PTA). PTA has played a vital role in military training since World War IIⁱ in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercisesⁱⁱ, and live-fire drills.ⁱⁱⁱ If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.^{iv}

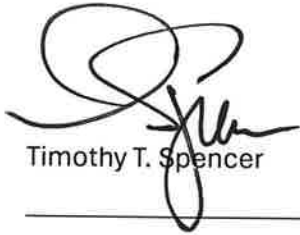
As a resident of Hawai'i, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard. I am a retired, Lieutenant Colonel, from the Hawaii Army National Guard with a service record of 29 of service. As well as being part of the Hawaii Army National Guard, I am a retired Honolulu Police Sergeant from the Honolulu Police Department with 30 years of service.

High Altitude and desert like conditions: The high altitude, and desert like conditions of PTA provides rigorous training experiences that prepares our troops for this type of environment across the world. Similar terrain can be found in Asia, portions of Southeast Asia, West Africa, and the Middle East region where hybrid warfare threats to the United States of America exist.

Critical for the Hawai'i Army National Guard: PTA played and continues to play a critical role in training our own Hawai'i Army National Guard Troops. PTA was very instrumental in preparing our Guardsman for their deployments to Iraq and Afghanistan from 2004-2013, and 2023.^v Training at PTA was also critical for our Hawai'i Guardsmen in preparation for their 2019 deployment to the Sinai in Egypt and to Kosovo. Under presidential orders, the Hawai'i Army National Guard continues to deploy our Hawai'i Soldiers across the world, with 8 Soldiers to West Africa in support of Operation Juniper Shield^{vi} in 2023, and the 2-641 Aviation Regiment deployment to the Middle East in support of Operation Enduring Freedom - Spartan Shield in 2024.^{vii} By retaining this land, we can continue to support our Hawai'i National Guard in ensuring that our Guardsman have the best training in preparation for their deployments in these operational contingencies and combat zones.

Thank you for your attention to this matter. I trust that you will carefully consider the importance of Army Retention of the Pōhakuloa Training Area as it provides critical training conditions necessary for our Hawai'i Army National Guard - "Hawai'i's Own".

Sincerely,



Timothy T. Spencer

ⁱ Koehnen, F. J. (2015). *Been There Done That Back to Hilo*. Hilo, Hawaii, United States of America: Lyman Museum and Mission House, (143,144)

ⁱⁱ <https://www.dvidshub.net/image/8098598/jpmrc-24-01>

ⁱⁱⁱ <https://www.dvidshub.net/image/6533705/range-qualification-and-training-pohakuloa-training-area>

^{iv} https://www.army.mil/article/269078/pta_continues_to_draw_dignitaries_due_to_critical_mission_in_the_pacific

^v <https://dod.hawaii.gov/blog/main/hawaii-army-national-guard-units-notified-about-upcoming-deployments/>

^{vi} <https://www.staradvertiser.com/2024/01/10/hawaii-news/hawaii-national-guardsmen-to-join-west-africa-operation/>

^{vii} <https://www.dvidshub.net/image/8267343/2nd-641st-aviation-soars-into-deployment-support-spartan-shield>

Gerald Takase
2887 Kanoelani St.
Hilo, HI 96720
Gtakase3@hotmail.com
808-987-0799
April 22, 2025

Board of Land and Natural Resources
Attention: Dawn N.S. Chang, Chairperson and members of the board
1151 Punchbowl Street, Room 130
Honolulu, HI 96813

Dear Chairperson Chang,

As a retired US Army, a Hawaii Army National Guardsman and a resident of the County of Hawaii, I am writing to express my strong support for the Army's retention of the Pohakuloa Training Area (PTA) on Hawaii Island. This training area is not only vital for military readiness but also provides significant benefits to Hawaii County and its residents. Let's face reality, the new Saddle Road/Daniel K. Inouye would never have been built except for the fact that PTA exists up there.

Firstly, PTA employs a dedicated team of civilian personnel who contribute to the smooth operation and maintenance of the facility. The Directorate of Public Works alone supervises 10 staff members responsible for maintaining over 400 real property assets, including roads, fire breaks, and fencing. These civilian jobs are crucial for the local economy and provide stable employment opportunities for residents.

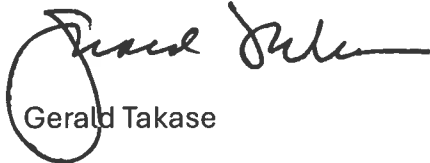
Additionally, the US Army Corps of Engineers awards various contracts to manage non-military operations at PTA. These contracts encompass a broad range of services, from construction projects to professional services, fostering local business growth and bolstering the county's economic stability. Specifically, these contracts include the maintenance and repair of roadways for range operations, as well as environmental and cultural resource management. Residents of Hawaii Island are frequently employed to carry out these contracts, which also benefit local businesses, such as a trucking company responsible for transporting water to PTA.

Furthermore, PTA also plays a critical role in emergency management for Hawaii County. Through a Memorandum of Agreement (MOA), PTA first responders assist Hawaii County Police and Fire departments during emergencies. This collaboration has proven invaluable during natural disasters, such as volcanic eruptions, where PTA's resources and personnel have helped mitigate traffic hazards and respond to civilian accidents. The partnership between PTA and local emergency services ensures the safety and well-being of Hawaii County residents.

In conclusion, Army retention of Pohakuloa Training Area is essential for the continued economic and emergency management benefits it provides to Hawaii County. I urge the Board of Land and Natural Resources to support the Army's request to retain this vital training area.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald Takase", written over a circular stamp or seal.

Gerald Takase

Robert Usagawa
27 Hoomalu Street
Hilo, Hawaii 96720-3308
Email Address: robert.usagawa@gmail.com
Mobile Number: (808) 557-4052
April 20, 2025

RECEIVED

2025 APR 24 AM 8:13

DEPT. OF LAND
& NATURAL RESOURCES
STATE OF HAWAII

Dawn N. S. Chang
Chairperson, Board of Land and Natural Resources
P.O. Box 621
Honolulu, Hawaii 96809

Subject: Support for U.S. Army Land Retention of Pohakuloa Training Area

Dear Dawn N. S. Chang,

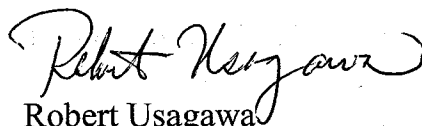
I am writing to express my strong support for the U.S. Army's continued land retention of the Pohakuloa Training Area (PTA) on the island of Hawaii (Big Island). As a concerned citizen and a retired Hawaii Army National Guardsman, PTA has played a vital role in military training in preparation for military readiness.

PTA's training area allows our armed forces to conduct essential training exercises, to simulate real-world scenarios, joint exercises, and life-fire drills, ensuring our military preparedness. The high altitude, and desert-like conditions of PTA provides rigorous training experiences that helps prepare our troops for the type of environment across the world.

If the Army is unable to retain this land, the soldiers who train at PTA (Army National Guard, Marines, Active Army, and at times the Air Force) will be critically impacted for not having a great training facility that provides the best training possible in preparation for deployments.

Thank you for your attention to this matter. I trust that you will carefully consider the importance of Army Retention of the Pohakuloa Training Area as it provides critical training conditions necessary for our nation's military forces.

Sincerely,



Robert Usagawa
Staff Sergeant, U.S. Army Retired

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island. This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.
 - A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.
 - Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
 - Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
 - No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.
-
- Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.
 - Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk. I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,
Alana Wesly

Kaneohe, Oahu, HI

From: [LeaDan Yee](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] We Demand BLNR to Reject the U.S. Army's Pohakuloa FEIS
Date: Wednesday, April 30, 2025 9:36:18 PM

Aloha Chair Case and Members of the Board of Land and Natural Resources,

My name is LeaDan Yee. I am Kanaka Maoli, a public high school teacher, mother, and wife of an almost retired Lt. Colonel, who has given 22 years of service to the U.S. Army. We have just returned home, after having spent five years abroad due to my husband's assignments, in the hope to build a future for ourselves and our keiki. What future do we leave for the children of Hawai'i if we do not fight for their right to not just land and water but CLEAN land and water?

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island. Moku O Keawe is home of our ancestors and continues to be the home of our family, valuable natural resources, endemic plants and animals that must be protected.

This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does not provide the public nor this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

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- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.

* Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.

- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that

sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,
LeaDan Yee
O'ahu, Hawai'i
Uberdb8dork@gmail.com

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island. This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

The key issues that warrant immediate rejection include:

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- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.
- Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.
- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk. I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental

review, with transparent data, community accountability, and a credible cleanup and mitigation

plan. This is my request, as a lifelong resident of Hawai'i Island and a conservationist. We cannot afford to further imperil our 'āina, wai, and native species.

Sincerely,

Rosemary Bearden

Ninole, Hawai'i 96773

rosemarybearden42@gmail.com

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Moku O Keawe.

This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.

A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.

Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.

Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.

No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.

Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila. Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

The US Army and military in general has repeatedly shown lack of respect and blatant mismanagement of the land that they have jurisdiction over. They must be held accountable to the highest standards. Anything less is unacceptable for the sake of our 'āina and communities.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,

Skyler Chong

To everyone on the board,

I hope this email finds you all well. I wanted to reach out personally to urge you to reject the Final Environmental Impact Statement (FEIS).

I am sure you field a lot of weighted emails/correspondences, and this is a hard job, but one that also allows you the opportunity for positive impact on the community, and the environment.

I believe that rejecting FEIS could be a part of that much wider impact. There are many things to disagree on in this life, but when we turn our backs on the environment, we turn our backs on everyone, including ourselves.

Please consider this in rejecting FEIS and requiring proper environmental cleanup to improve the world for the better, as you personally are in the position to do so. You hold the power to make a difference.

Sincerely,

Sara Isaacson

Aloha Chair Case and Members of the Board of Land and Natural Resources,

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by

the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands

at the Pōhakuloa Training Area (PTA) on Hawai'i Island.

This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does

not provide the public or this Board with the information needed to make an informed, lawful

decision. Rather than address valid concerns raised during the draft process, the Army's final

document raises more red flags, avoids key questions, and withholds critical data.

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No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.

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Incomplete greenhouse gas data, while making unsupported claims about climate impacts.

This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,

Renee Katayama

Honolulu, O'ahu