

Aloha Members of the Board of Land and Natural Resources,

My name is Silas Adams and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Silas Adams

Lihue, Kauai

Dr. Rosanna ‘Anolani Alegado
47-543 Halemanu St.
Kāne‘ohe, HI 96744

May 7, 2025

Dawn Chang, Chairperson
Board of Land and Natural Resources
Kalanimoku Building
1151 Punchbowl St.
Honolulu, HI 96813

Sent via email to: BLNR.testimony@hawaii.gov

Subject: Testimony to BLNR to REJECT the US Army’s Pohakuloa Final EIS

Dear Chairperson Chang and Members of the Hawai‘i Board of Land and Natural Resources,

My name is Rosanna ‘Anolani Alegado and I’m a resident of Āhuimanu Kahalu‘u on O‘ahu. My ‘ohana comes from Hawai‘i Island (both the Hāmākua side in Laupahoehoe as well as Holualoa in Kona) where we have lived for generations, depending on healthy ecosystems and water to feed our community. I am also a scientist who has direct knowledge of water systems, water quality and water pollution. In addition, I served on the Honolulu Climate Change Commission for several years and have knowledge of climate change vulnerability impact assessment. I strongly urge you to REJECT the Final EIS on Pohakuloa that is extremely deficient in a number of areas.

1. The US military has failed to demonstrate that they are able to adequately clean up areas of Hawai‘i after use and contamination of these precious ‘āina. The impact area (approximately 51,000 acres) has been impacted tens of millions of live rounds. There is inadequate record keeping as to the the weapons systems fired in the Pohakuloa Training Area (PTA) which makes clean up difficult if not impossible.
2. The quantity of Depleted Uranium (DU) weapons and the concomitant hazards associated with these types of weapons has been inaccurately reported. The EIS states 400 DU spotting rounds for the Davy Crockett Nuclear weapon system. First, the Army denied that any DU rounds were being fired at PTA. Then in 1996, Army Hawai‘i Garrison Colonel Howard Killian testified that DU was not prohibited from being used in training until 1996. This admission was followed by additional information in 2008, when Col. Killian testified at the Hawi‘i County Council that the number of individuals who are certified to fire the Davy Crockett Weaspon systems at PTA would actually total 2,000 DU rounds. In all likelihood, MORE DUE penetrating rounds were fired at PTA. The half life of DU is 4.5 billion years¹. When used in military training situations, DU high with high explosives will burn, turning into DU oxide particles that can be dispersed by wind. There is a documented association between lung cancer risk and uranium

¹Gulf War and Health: Volume 1. Depleted Uranium, Sarin, Pyridostigmine Bromide, Vaccines.

exposure as well as toxicological effects on respiratory and central nervous system damage.² Pohakuloa is a windy area in the center of Hawai‘i Island, wind dispersal is *highly likely*.

3. In addition to use of DU at PTA, there is confirmed contamination from lead, arsenic, petroleum compounds and other munitions constituents for which the Army has failed to conduct comprehensive soil and groundwater testing. In other areas of the world with similar contamination, these chemicals are known to infiltrate into groundwater. Given the reliance of Hawai‘i Island communities on aquifers, serious attention should be paid by the US Army and this Board to the potential for contamination.
4. The US Army has exacerbated fire risk at Pohakuloa and inadequately addressed mitigating risk. From the US Final EIS report, they admit that 1261 wildfires have been started because of shelling since 1975. As noted earlier, Pohakuloa is windy and its habitat is dry. Given shifting climate scenarios, this area of Hawai‘i Island will only become more dry. In 2022, more than 12,000 acres of PTA were burned in a single fire, destroying endangered species habitat. Placing a tinderbox in the middle of Hawai‘i Island creates the condition for uncontrollable wildfires spread that would rage through precious and uncoverable ecosystems.

The points above state the present and future dangers to Hawai‘i Island that the US Army has continually failed to address and improve upon. However there are several significant issues in the report itself that merit rejection of the Final EIS:

- Lack of a cumulative impact analysis of the full 132,000-acre PTA operation which narrows the scope of environmental review
- More than half of Pohakuloa has not had an assessment survey of the cultural and historic sites. This demonstrates a disregard for and disrespect of Hawai‘i’s culture and its fragile ecosystems in addition to being grossly insufficient to enable a comprehensive impact review. A complete inventory of archeological sites that have been or may be impacted by military training must be included
- Incomplete greenhouse gas emissions data were provided which make a full understanding of climate impacts impossible to evaluate.
- The final EIS should include a response to Hawai‘i County Council regarding Resolution 639-08 as well as addressing comments raised in the draft EIS process as well, including comments by DLNR staff Ryan Okano, Division of Aquatic Resources (4/29/2025) about impacts to aquatic resources.
- The final EIS should include more discussion on the rare high-elevation sub-alpine tropical dryland ecosystem.

The BLNR has a duty to protect, preserve and restore Hawai‘i’s finite resources which serve as our cultural foundation and our foundation for survival on these islands. The numerous issues

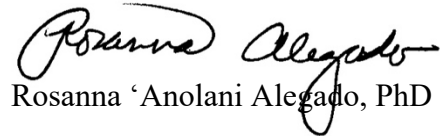
² [Health Effects of Particulate Uranium Exposure](#)

with the report in addition to the ongoing harm to Pohakuloa merit a REJECTION of this final EIS report. The Board has not been given the “full range of responsible opinion on environmental effects” that is required.

The bombing and desecration of our lands must stop. The US Army must clean up Pohakuloa and return this ‘āina to the Hawaiian people.

Reject do not accept the Pohakuloa Final EIS.

Me ka ha‘aha‘a,

A handwritten signature in black ink, appearing to read "Rosanna Alegado". The signature is fluid and cursive, with the first name "Rosanna" and the last name "Alegado" clearly distinguishable.

Rosanna ‘Anolani Alegado, PhD

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

My name is Kelsey Amos, and I urge you to reject the FEIS in agenda item D-1.

DLNR staff have themselves raised concerns about deficiencies in the FEIS, which you can see in their staff analysis.

Personally, I don't know how an FEIS *could* be sufficient and conclude that bombing 'āina in a conservation district where there are burials and archaeological sites is an ok thing to do.

Pōhakuloa has been bearing this desecration for too long, and it needs to stop. You can make a difference in that.

Please reject the Army's FEIS.

mahalo,

Kelsey

--

Kelsey Amos, PhD
she/her

To: Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal

and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your

deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka ‘ōia‘i‘o,

Christina Alapai-Sulich

Kealahakua, HI

Living state side in Virginia by way of military

757-343-2425

Aloha Chair and Members of the Board of Land and Natural Resources:

I am writing to urge the Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (FEIS) regarding the retention of approximately 22,750 acres of state-owned conservation land at Pohakuloa Training Area (PTA) when the current lease expires in August 2029.

The Army's FEIS fails to adequately address significant environmental and cultural concerns that must be prioritized over military interests. As stewards of state lands held in public trust, the BLNR has a responsibility to protect these lands for future generations, not continue a harmful arrangement that began in 1964 when the Army obtained the parcel for a mere \$1.

Environmental Concerns

Pohakuloa is classified as a sub-alpine tropical dryland forest—one of the world's rarest ecosystems. This irreplaceable land provides critical habitat for the endangered nēnē (Hawaiian goose), the 'ōpe'ape'a (Hawaiian hoary bat), and numerous other endemic species found nowhere else on Earth. The FEIS acknowledges but fails to sufficiently mitigate potential harm to native species, water resources, and soil through live fire exercises and toxic contamination.

The Army's own documentation reveals a troubling history of environmental degradation: between 2012 and August 2024 alone, 96 fires were recorded on the parcel, burning approximately 19,328 acres. The FEIS itself predicts increasing wildfire risk due to climate change, yet proposes to continue activities that have repeatedly caused such fires.

Cultural Impacts and Legal Obligations

The Hawai'i Supreme Court ruled in 2019 that state officials failed to ensure the military upheld its duties to clean up Pohakuloa, finding that this failure harmed Hawaiian cultural interests. The Court explicitly stated that "as trustee, the State must take an active role in preserving trust property and may not passively allow it to fall into ruin." Approving the FEIS would directly contradict this legal ruling.

The FEIS acknowledges that continued military use would have "significant adverse impacts" on cultural practices and environmental justice but fails to propose adequate solutions. The Office of Conservation and Coastal Lands has stated clearly that the proposed use is inconsistent with Conservation District designations and state land use policy, concluding that the "no action alternative would provide the best benefits to the land, cultural resources and traditional Hawaiian practices."

Reasonable Alternatives

The Army has alternative training facilities available, while Hawai'i has only one Pohakuloa. Conservation and cultural restoration represent a more appropriate future for these lands. The FEIS fails to adequately consider full cleanup and restoration alternatives that would honor both the land's conservation status and its cultural significance.

The days of the military leasing culturally significant conservation lands for nominal amounts are over. The BLNR should reject this FEIS and require the Army to fulfill its existing lease obligations to clean up and restore the land to its original condition before the lease expires in 2029.

Conclusion

I respectfully ask the BLNR to:

1. Reject the Army's FEIS as inadequate and inconsistent with the land's conservation designation
2. Require complete removal of unexploded ordnance and environmental remediation of the leased lands
3. Fulfill the state's obligations as trustee by prioritizing environmental protection and cultural interests over military use
4. Pursue the "no action" alternative, which would best serve the land's long-term protection

The decisions you make today will determine whether future generations inherit protected, restored lands or lands further degraded by military use. I urge you to reject the FEIS and choose the path of environmental and cultural stewardship.

Me ka ha'aha'a,

Ha'aheoku'umomimakamae'owailani

Chairperson Dawn Chang and Members of the Board
Board of Land and Natural Resources
State of Hawai'i
1151 Punchbowl Street, Room 132
Honolulu, HI 96813

RE: **Testimony in Support of the Pohakuloa Training Area** (BLNR Meeting 5/9/2025)

Dear Chairperson Chang and Members of the Board:

Thank you for the opportunity to present testimony today on the Pohakuloa training area. I am Dr. Lynn Babington, President of Chaminade University. As a member of the Chamber of Commerce Hawai'i's Military Affairs Council (MAC), I am writing in full support of the U.S. Army's request to retain training lands at Pōhakuloa Training Area (PTA).

The ability to train year-round at PTA is essential to maintaining operational readiness and preparing our service members for the complex challenges they face across the Indo-Pacific. The unique terrain, scope, and location of PTA make it irreplaceable for joint exercises, disaster response, and mission-critical coordination.

I urge the Board to carefully review and accept the Final Environmental Impact Statement (FEIS). I am confident the Army is making a sincere effort to identify solutions that preserve lands of cultural and agricultural value while ensuring that the training mission can continue.

PTA has long represented a partnership between the military and the community, fostering readiness, economic opportunity, and environmental stewardship. Accepting the FEIS ensures this balanced approach can move forward.

Mahalo for your time and consideration.

Sincerely,

Lynn Babington, PhD
President

Aloha,

My name is Nalani Balutski, I am a Native Hawaiian faculty member at the University of Hawaii at Manoa.

The BLNR has a trust obligation to protect Hawaiian lands and natural resources. The US Army EIS for Pohakuloa (similar to other projects that the US military has been responsible for), has demonstrated how, time and time again, the US Army does not have a good track record of being a good caretaker for both Hawaiian land and its resources. There has already been toxic and environmental contamination, this will continue, and the US has not committed to clean ups in a timely or complete manner. We literally have the example of Red Hill most recently to show how much energy and protest it will take for the US to even acknowledge wrong doing. Why would BLNR offer another lease to a tenant who has been belligerent?

Reject the EIS.

Mahalo,

Brandi Nalani Balutski, PhD

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

My name is Perle Besserman and I respectfully urge you to reject the clearly insufficient FEIS in Item D-1.

By accepting such a shoddy FEIS, the BLNR will make it that much harder to carry out its overall mission. Every subsequent applicant required to undergo environmental review before a BLNR action will be able to point to the BLNR's acceptance of this deficient document to excuse their own shortcomings, and future BLNR members may feel pressured to give in to their demands for deference - at the expense of our natural and cultural resources, and Hawai'i's present and future generations.

***Therefore, please REJECT the FEIS put forward in Agenda Item D-1.
Mahalo nui for the opportunity to testify.***

Sincerely,

Dr. Perle Besserman

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR’s kuleana to mālama ‘āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai‘i State Constitution, DLNR is legally bound to conserve and protect Hawai‘i’s natural and cultural resources for present and

future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha ‘āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka ‘oia‘i‘o,

Yana Lins Bonetti

Honolulu, Oahu

310 7330540



May 7, 2025

Chairperson Dawn Chang and Members of the Board
Board of Land and Natural Resources
State of Hawai'i
1151 Punchbowl Street, Room 132
Honolulu, HI 96813

RE: **Testimony in Support of the Pohakuloa Training Area** (May 9, 2025 BLNR Meeting)

Dear Chairperson Chang and Members of the Board:

As a member of the Chamber of Commerce Hawai'i's Military Affairs Council (MAC), I am writing in full support of the U.S. Army's request to retain training lands at Pōhakuloa Training Area (PTA).

The ability to train year-round at PTA is essential to maintaining operational readiness and preparing our service members for the complex challenges they face across the Indo-Pacific. The unique terrain, scope, and location of PTA make it irreplaceable for joint exercises, disaster response, and mission-critical coordination.

I urge the Board to carefully review and accept the Final Environmental Impact Statement (FEIS). I am confident the Army is making a sincere effort to identify solutions that preserve lands of cultural and agricultural value while ensuring that the training mission can continue.

PTA has long represented a partnership between the military and the community, fostering readiness, economic opportunity, and environmental stewardship. Accepting the FEIS ensures this balanced approach can move forward.

Thank you in advance for your time and consideration.

Sincerely,

Edward Brown: Hawaii Divisional President

GOODFELLOW BROS, LLC

To Whom This May Concern,

I remember at UH Hilo my geography teacher took us on a field trip (the only one I ever took during my college career). He first took us to the iconic Singing Bridge in Hilo, explaining how he was starting our field trip kind of backwards. He wanted us to see the water flowing from the stream into the ocean.

As the day progressed, we stopped at different locations while heading up Saddle Road. Eventually we stopped near a hunter check point station and he said that even at our high elevation, water was being collected at an even higher elevation on the mountains around us. The rain that falls from the sky falls onto the mountains, and from the mountains it goes into the ground. From the ground, it slowly moves through our porous lava rocks underground, where it eventually goes into our fresh water springs and ultimately, down to the ocean, where it is evaporated and rained on top of the mountains again. The rain cycle repeats, falling from the sky, into the ground, out to the sea.

Being born and raised in Hawaii and growing up here on Hawai'i Island, this was no new news to me, but I saw how the wheels were turning in my fellow mainland classmate's brains. They were understanding the butterfly effect, how one thing can affect another.

I am not humbly asking you to tell the Army to stop bombing Pōhakuloa, I am demanding that you do everything to put a stop to all military exercises in the islands and surrounding waters of Hawaii. **REJECT THE ARMY'S FINAL ENVIRONMENTAL IMPACT STATEMENT.**

Respectfully, there are training facilities for the military that are in other areas of the country that have already lost their beauty and will never return to the pristine, clean land it once was. This island is home to not just people, but plants and animals that are found no where else in this world. Let that sink in. In the WORLD. And you think it's a great idea for the military to continually bomb at a high elevation, contaminating our water sources? You can not say that there is no damage being done when the ground shakes and the explosions are heard from miles away.

I worked at Hawaii Volcanoes National Park for a brief time in my life before I started my family. Hiking in remote lava fields, I would find so many shell casings from the military when they would fire for exercises back before it was a national park. In the steam vents and surrounding areas I would find dump spots from the military, their trash STILL on and in the ground decades after leaving the area. The military does not care about this land, and ultimately they do not care about the residents, look at what happened at Red Hill.

I never understood why the military is allowed to do weapon exercises on a major aquifer for our island. Water works with gravity, and if you contaminate the source from the top, what do you think we're getting out of the spigots at the bottom? How long can our island sustain their drills before the irreversible damage is done and we have toxic water?

I want my son, and his future family, my future grandkids---to be able to play in a clean ocean, to be able to swim in rivers, to be able to drink water from the county spigots.

If the continuation of the military exercises at Pōhakuloa continue, I do not see that happening.

Hawaii is something we should be trying our hardest to protect, not rent it out to the military.

If all these well educated scientists can provide evidence, why is it still being done?

It doesn't take a genius to figure it out. You shoot something once, it'll forever be changed. Bomb something again and again, it will never be the same, no matter how much someone claims it's still the same.

Do what's best for the land, and move military exercises out of Hawai'i.

Unfortunately I know that this email of mine is not going to make a difference, because the people in charge obviously do not care about the land or its people. If they seriously did, it would be an area for conservation, not military exercises. The difference is night and day.

You people who are making these decisions will be long gone before major affects are seen. Be a part of the solution, not the problem.

Mahalo,

-Megan Burris

"The greatest waste in the world is the difference between who we are and what we could become." -Ben Herbster

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

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I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha ‘āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuhoa begin.

Me ka ‘oia‘i‘o,

[Your Full Name]

[City, Island]

[Kanaka Maoli / Cultural Practitioner / Title if applicable]

[Contact Information]

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned citizen and steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

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Me ka 'oia'i'o,

Amara D. Canfield

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Herón Carrillo

Turtle Island

Cultural Practitioner/ Native Indigenous

heroncarrillo@yahoo.com

[Yahoo Mail: Search, Organize, Conquer](#)

Sent from my iPhone

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned community member and steward of this 'āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

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Anna Casaretto

Honaunau, Hawai'i

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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Me ka ‘ōia‘i‘o,

Hunter Christensen

Captain Cook, Hawaii

Native Hawaiian. Graduate of Kamehameha schools Hawaii campus class of 2011.

Mobile: 808-345-6109

My name is Marisa Contreras, an American citizen and I am opposing the U.S Army's use of Pohakuloa.

Pohakuloa is sacred Hawaiian land and using Hawaiian land for U.S. imperialism is desecration.

The U.S. army is responsible for immeasurable damage to Hawaiian land and water with no plans for clean up in sight. Just as with Kahhoolawe and Makua, the U.S. army does not need Pohakuloa for training.

The Army wants to continue to use Hawai'i as a base in the Pacific which we do not and never have consented to.

The EIS conflicts with the BLNR's constitutional duty to mālama 'āina.

I urge BLNR to REJECT the army's EIS.

Sincerely,

Marisa Contreras

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Ismael Jameel Cruz

Honolulu, O'ahu

eltn333@gmail.com

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and to urge the land board to reject the Army's EIS.

Pōhakuloa is not just a piece of land—it is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. The Army has not demonstrated the capacity or will to serve as a proper steward of this land, and the FEIS fails to meaningfully address these concerns.

For example, the Army's actions have already resulted in the burning of nearly 20,000 acres, including designated critical habitat for native flora and fauna. This is unacceptable. Additionally, the ongoing use of live-fire and bombing in the impact area raises serious concerns about environmental contamination, safety, and long-term degradation of both the land and water.

Military training activities of this scale are simply not compatible with conservation, cultural integrity, or aloha 'āina. Enough is enough.

The EIS is insufficient and should be rejected on several grounds:

Inadequate Environmental and Cultural Impact Analysis

Lack of a sufficient plan to mitigate impacts to cultural and natural resources

Concerns about depleted uranium on the site have gone unaddressed

Military usage is incompatible with the conservation district designation

The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina

I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration.

Sincerely,
Malia-Blossom Cruz
Hilo, Hawaii

--

Malia-Blossom Cruz

email: mbmtcruz@gmail.com

phone: 808-938-1016

Aloha Chairperson and Members of the Board,

My name is Jahrai David, and I am a resident of Honolulu Hawai'i. I am writing to express my strong opposition to the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army concerning the proposed renewal of military leases at Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely a tract of land; it is a sacred and ecologically sensitive area that holds profound cultural significance for Native Hawaiians. The initial leases, signed in 1964 for a nominal fee, have led to decades of environmental degradation, including the presence of unexploded ordnance and contamination from military activities .

The FEIS fails to adequately address the cumulative environmental and cultural impacts of continued military use. It overlooks the historical trauma inflicted upon the land and its people and does not provide a comprehensive plan for remediation or restoration .

Renewing these leases would perpetuate the cycle of environmental harm and cultural disrespect. It is imperative that we prioritize the health of our 'āina and the well-being of future generations over continued military occupation.

I urge the Board to reject the FEIS and cease all negotiations regarding lease renewals at PTA. Let us honor our commitment to environmental stewardship and cultural preservation.

Mahalo for considering my testimony.

Sincerely,

[Jahrai David]

Aloha,

As a lover of the land and this island, and on behalf of its beauty and future, I urge you to please reject the US militaries final environmental impact statement on their bombing of Pohakuloa.

They have not been cleaning up their waste. The area looks like a nuclear test site. They are contaminating our land and water with chemicals and bombings.

And for what - to test out military toys? Is it not clear that the military is the real terrorist to the land?

If you have any concern for the future, your children, and their children's future, I strongly urge you to reject the US militaries final impact statement, as it directly impacts the well-being of all of our futures.

Respectfully and with full aloha,

Nicolette Douvris

808-430-2871

ndouvris@yahoo.com

[Yahoo Mail: Search, Organize, Conquer](#)

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Me ka 'ōia'i'o,

Ann Marie England

Honoka'a, Hawai'i Island

Email: annmarieengland@outlook.com

Phone: 808-936-5935

Get [Outlook for Android](#)

Aloha Land Board Members:

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Sincerely,

MaryElizabeth Ferla-Brown

Holualoa, HI

[Yahoo Mail: Search, Organize, Conquer](#)

Aloha Kākou,

My name is Kamala Galletes. I am a wife, a mother, and grandmother. I was born and raised on Hawai'i Island and care deeply for this place we are lucky to call home.

I am submitting testimony today to kindly ask that you reject the FEIS for the continued military use of Pōhakuloa.

Ua Mau ke Ea o ka 'Āina i ka Pono. The life of the land will be perpetuated with righteousness.

BLNR, please tell me what is so righteous about bombs being dropped on sacred cultural sites, endangered species, and the iwi kūpuna? What is so righteous about the desecration of the cultural and natural resources for generations to come? Do you not understand the special connection the Hawaiians have to the land, including Pōhakuloa. Do you not have a constitutional responsibility to protect these places and things from harm?

I have seen, heard, and felt the bombs drop and you will never be able to convince me that the environment is not being impacted, and the BLNR is clearly NOT doing everything in their power to protect this land. This land is being hurt, and the effects will be detrimental for eternity.

Therefore, I ask you to be strong, brave, and be the ultimate voice for the land and the Hawaiians by urging you to reject the Final Environmental Impact Statement (Agenda Item-D1).

Mahalo Nui Loa,

Kamala Galletes

I oppose the bombing of pohakuloa, it is ridicules to even think of bombing a place where the rain water will trickle down on our aquifer, I have a well and drink of this water.

Eric Gamundoy

Sent from my iPhone

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhaku Loa begin.

Me ka ‘oia ‘i ‘o,

[Your Full Name]

[City, Island]

[Kanakanaka Maoli / Cultural Practitioner / Title if applicable]

[Contact Information]

Sent from my iPhone

Melanie Gillcoat

Aloha,

I am a concerned citizen. I am concerned for water, animals, sacred places and humanity world-wide.

Pohakuloa is not a blank slate for military experimentation. It is a sacred, living entity—a kupuna—that holds the bones, stories, and responsibilities of the future of Hawaii and beyond.

The Army's Final Environmental Impact Statement is not just insufficient it is a painful dismissal of the cultural, environmental, and spiritual significance of this place. It fails to account for decades of irreparable damage already inflicted, the desecration of iwi kupuna, and the poisoning of native species and watersheds. Even more, it disregards our constitutional right under Article XII, Section 7 of the Hawaii State Constitution—to protect customary and traditional practices.

Pohakuloa is not a training ground. It is a wahi pana, a sacred space. No amount of mitigation can restore what has already been lost. And no military need can justify the continued sacrifice of our heritage, our health, and our kuleana to future generations.

I ask the BLNR to reject this FEIS—not just as a bureaucratic decision—but as an act of pono, of justice, and of aloha 'āina. If you are stewards of the land, then protect it. If you honor the law, then uphold our rights. And if you believe in the future of Hawaii, then let that future be rooted in healing, not harm.

Mauna Kea has been listed on the National registry of sacred places and Mauna Loa is an active volcano. To continue bombing these places at the base of these sacred mountains is ignorant to future life.

Mahalo for your time and your action to do what is right.

Randy Goff

Dear Chair Chang and members of Board of Land and Natural Resources,

This FEIS from the Army is a ninsult to the State and its rights and responsibilities, to Native Hawaiians and to anyone with the barest concepts of environmental justice.

The activities of the military over the past 50 years have been in constant conflict with natural and cultural preservation at Pohakuloa. An honest attempt at cultural, archaeological and biological research would reveal the deficiencies in this FEIS.

Please reject this EIS.

Thank you,

Kip Goodwin

Kapaa, Kaua`i

Aloha Kakou,

My Name is Kaulana Gouveia, and I am a Kanaka Maoli, 11th grade Student at Hālau Kū Māna. I am submitting this testimony in **STRONG OPPOSITION** to the Final Environmental Impact Statement (FEIS) for the proposed renewal of military leases on Hawaiian lands. I also call for an immediate and permanent end to all negotiations regarding renewing these leases, which are set to expire in 2029.

In 1964, the State of Hawai‘i leased over 29,000 acres of public land—much of it “ceded land”—to the U.S. military for just \$1 a year. That’s not just a bad deal, it’s a decision that allowed decades of harm. These lands, including Makua Valley, Pōhakuloa, Kawaihoa, Pu‘uloa, and Kapūkakī, have been used for live-fire training and other destructive activities. What’s left behind are toxic materials like depleted uranium, unexploded bombs, and irreversible environmental damage. But even worse, these are places with deep cultural and spiritual meaning to Native Hawaiians—lands that carry stories, ancestors, and identity.

This isn’t about trying to get a better lease or more money. It’s about recognizing that no dollar amount can justify the desecration of sacred land. These places aren’t empty or expendable—they are alive, sacred, and tied to the identity of this place and its people.

The military has had decades to show it could be a responsible steward, and it has failed. The Final Environmental Impact Statement (FEIS) doesn’t adequately address the full damage done, nor does it earn back the public’s trust. Continuing these leases sends a clear message that military interests come before Native Hawaiian rights, cultural survival, and environmental justice.

We cannot keep repeating this cycle. As a student, I believe we have a responsibility to learn from the past and stand up for what’s right. Like Kaho‘olawe, these lands must be returned—not just to stop the harm, but to begin real healing. As George Helm once said, “What is national defense when what is being destroyed is the very thing the military is entrusted to defend?”

I urge the Board of Land and Natural Resources and Governor Green to listen to the voices of the people, especially young people like myself who will inherit the consequences of today’s decisions. Reject the FEIS. End these leases. Restore the ‘āina and return what was never freely given.

“E mau ke ea o ka aina i ka pono”

Sincerely, Kaulana Gouveia

Aloha,

I am writing to show my support for the movement AGAINST the US Army's continued use of Pōhakuloa as a live-fire zone. It is time to respect the lands that take care of all humans, clean up the area that has been bombed and abused for decades. Please do not give the US Military a lease renewal and permission to destroy the land for current and future generations. It's time for the military to do more than occupy, take, destroy and colonize. They must be required to clean up their mess and be prevented from causing irreparable damage in the future.

Thank you for your consideration,

Jessica Heiman

1821 Keeaumoku st. #101

Honolulu, HI 96822

Aloha Department chairs of Board of Land and Natural Resources,

My name is Kimmer Bighorse and have been stationed at Schofield Barracks as a light and heavy wheel diesel vehicle mechanic at first since in 2008. I enlisted for the Global war on terrorism in March 2002 where I served in many middle east and overseas tours including Germany, Hawaii, Iraq and Afghanistan. Since then, I never in my active duty Army career, seen the destruction and neglect of the environment as Hawaii's oceans, skies, space, and land bases.

Please see the attachments here as the locals, mainly Native Hawaiians have been monitoring their wahi pana land bases of Pohakuloa since 1957. This is why I recommend getting rid of the field artillery, armor combat units from Hawaii entirely as there simply is not enough room for their equipment, personnel or families. Not only that, the hazardous materials, contamination and pollution from such destruction of field training, ordnance detonation is not disposed of properly. This would never occur in Germany DE who has a heavily armed arsenal and military who monitor the United States base environmental impact. Even so, the German military did not renew the United States military leases, evicted much of the the United States military and downsized our forces.

I recommend downsizing the active duty personnel to the most essential military occupational services. Does the Army really need endless inventories of Abrams, Bradley tanks, heavy armor equipment vehicles, Strykers, 5-ton trucks, Howitzers, Patriot missile launchers for land battles like WWII?

Even though there are other militaries with nuclear powers building up, strategic war planning, and storing their arsenal the world over. The keiki o ka aina would rather save their lands, oceans, air and space than further contaminate and pollute their sacred water resources and wahi pana. There are other locations for the United States to store their heavy armor equipment and munitions other than the already overcrowded, overpopulated Oahu, Big Island, Kauai, Maui, Kahoolawe, Lanai and outlying islands such as Polaniku; deserted locations such as the Mojave Desert in California.

I recommend sending EOD explosive disposal units into clean up the deadly depleted uranium buildup, unexploded ordnance and deoccupy Pohakuloa immediately as it is located on a lava bed. Have Hawaiian cultural practitioners, kupuna, Kumu supervise the clean up.

Do NOT accept the Army's version of an environmental impact statement.

E malama pono, Aloha aina, Aloha Wai, Aloha Wakea,

Kimmer (Nahonu) Bighorse Hosen

10 year United States Army Veteran



Post



ainamomona and 5 others
Pōhakuloa



3,603 55



Liked by sierraclubhi and others

ainamomona The fact that our community
needs to take time out of our lives to convince



THE ARMY'S ENVIRONMENTAL IMPACT STATEMENT

THE FINAL EIS IS INSUFFICIENT

EIS needs to be rejected on several grounds:

- **Inadequate** Environmental and Cultural Impact Analysis;
- **No sufficient plan to mitigate** impacts to cultural and natural resources;
- Concerns about **depleted uranium on the site have gone unaddressed**;
- Military usage is **incompatible with the conservation designation**;
- The approval of the EIS ultimately **conflicts with the BLNR's constitutional duty mālama 'āina**

BLNR HEARING - FRIDAY, MAY 9 AT 9 AM
WRITTEN TESTIMONY - THURSDAY, MAY 8 AT 9 AM



THE ARMY'S ENVIRONMENTAL IMPACT STATEMENT

WHY REJECT THE ARMY'S EIS?

Inadequate Environmental and Cultural Impact Analysis -

Pōhakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of our most endangered species. **The Army has burned nearly 20,000 acres**, including designated critical habitat for native flora and fauna.

THE ARMY HAS NOT PROVIDED A SUFFICIENT PLAN FOR MITIGATING THE ENVIRONMENTAL AND CULTURAL IMPACTS!

BLNR HEARING - FRIDAY, MAY 9 AT 9 AM
WRITTEN TESTIMONY - THURSDAY, MAY 8 AT 9 AM



THE ARMY'S ENVIRONMENTAL IMPACT STATEMENT

WHY REJECT THE ARMY'S EIS?

The State has a Constitutional Obligation to Mālama 'Āina -

In **Kahaulelio v. DLNR**, 2019, the Hawai'i Supreme Court found that **the State of Hawai'i breached its constitutional trust duties by failing to:**

- Reasonably **monitor and inspect** trust lands at Pōhakuloa leased to the U.S. military;
- Ensure **compliance with cleanup and safety provisions** in the lease;
- Take action after learning of **possible contamination or violations**;
- Document efforts and **provide transparency to the public.**

BLNR HEARING - FRIDAY, MAY 9 AT 9 AM
WRITTEN TESTIMONY - THURSDAY, MAY 8 AT 9 AM



THE ARMY'S ENVIRONMENTAL IMPACT STATEMENT

WHY REJECT THE ARMY'S EIS?

Concerns Over Depleted Uranium (DU) Contamination -

Depleted uranium in the soil is churned up and aerosolized during live fire exercises and blown across the island. **Exposure to DU is linked to cancer** and other negative health impacts.

Military Use Conflicts with Conservation Land Designation -

The proposed uses of this site are **incompatible with a conservation designation**. Ongoing live-fire and bombing in the area threaten the native species and cultural resources of the area.

BLNR HEARING - FRIDAY, MAY 9 AT 9 AM
WRITTEN TESTIMONY - THURSDAY, MAY 8 AT 9 AM



To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 'Ōiwi and steward of this 'āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned

soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai‘i State Constitution, DLNR is legally bound to conserve and protect Hawai‘i’s natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha ‘āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka ‘oia‘i‘o,

Carrie Inamasu-Aken

Nānākuli, O‘ahu

808-424-3493

07cinaken@gmail.com

Subject: Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025

Aloha Members of the Board of Land and Natural Resources,

My name is Sarah Akina, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Sarah Akina
Kailua, Oahu, Hawai'i

Aloha mai kākou,

My name is Ikualono Jackson. I'm a student and a proud Kanaka Maoli. I'm writing to strongly oppose the Final Environmental Impact Statement (FEIS) for the military's lease renewal on Hawaiian lands. I also believe we should stop all talks about renewing these leases, which are supposed to end in 2029.

Back in 1964, the State of Hawai'i gave over 29,000 acres of land to the U.S. military for just \$1 a year. These lands include places that are supposed to be protected for the people of Hawai'i—many of them “ceded lands.” Ever since then, the military has used these areas for dangerous training, including live-fire exercises, leaving behind bombs, chemicals, and damage to our 'āina. Places like Makua, Pohakuloa, Kahuku, Kawaihoa, Pu'uloa (Pearl Harbor), and Kapūkakī (Red Hill) have all been hurt.

The military says it's for national defense—but how is it protecting us if it's destroying the land we live on and the places we call sacred? As George Helm once said, “What is national defense when what is being destroyed is the very thing the military is entrusted to defend?”

This isn't just about getting more money or making a better deal. These lands are not just empty training spots—they're sacred and full of mana. The damage that's already been done can't be undone in many places. Allowing these leases to be renewed is like saying that bombs and bullets matter more than Hawaiian culture, our health, and our future.

The FEIS doesn't really talk about the long-term harm, the cultural trauma, or how the military has failed us again and again. They've broken trust, and we cannot ignore that. Healing can't happen while the bombs keep falling.

Just like Kaho'olawe was taken back, these lands must also be returned. Enough is enough. It's our kuleana to protect the 'āina for the next generations. I'm asking the Board of Land and Natural Resources, and Governor Green, to reject the FEIS completely. No more deals. Give the land back. Return what was never freely given.

E mau ke ea o ka 'āina i ka pono.

Me ke aloha oia'i'o

Ikualono Jackson

Aloha Members of the Board of Land and Natural Resources,

My name is Lani Elizabeth Jenkins, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Lani Elizabeth Jenkins

96825

Aloha Board of Land and Natural Resources,

My name is Kinohi Jimenez. I am a student at Hālau Kū Māna Public Charter School and am submitting this testimony in strong opposition to the Final Environmental Impact Statement (FEIS) for the proposed renewal of military leases on Hawaiian lands.

This land is sacred. Situated between Mauna Loa, Mauna Kea, and Hualālai, Pōhakuloa is part of a delicate subalpine dryland forest ecosystem and home to numerous endemic and endangered species, including the nēnē goose and the Hawaiian hoary bat. These lands also hold deep cultural and spiritual significance for Native Hawaiians. Military activity—especially live-fire exercises—has already resulted in decades of environmental degradation, cultural desecration, and unsafe conditions due to unexploded ordnance and toxic contamination.

The State of Hawai‘i has a legal and moral obligation to protect public trust lands for the benefit of current and future generations. The Department of Land and Natural Resources has already found the Army’s continued use to be inconsistent with the Conservation District and state land use policies. Public and agency testimony has clearly shown widespread concern over past failures by the military to comply with lease terms, including inadequate clean-up of hazardous materials and lack of transparency and accountability.

I urge the State to adopt the No Action Alternative and begin immediate steps to prepare the land for safe return to public stewardship. This includes a full, Army-funded environmental cleanup of toxicants and unexploded ordnance, as well as restoration of access for cultural practices, public use, and conservation.

To continue down the same path without real accountability and resolution of these harms would be a betrayal of public trust, Hawaiian rights, and environmental responsibility. E ola ka ‘āina. The land must live.

Mahalo for the opportunity to testify.

**Respectfully,
Kinohi Jimenez
7 May. 2025**

--

Genesis Jimenez

Grade 11

Hālau Kū Māna Public Charter School

Lo‘i Project

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

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The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

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In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Nick Jimenez

[Sent from Yahoo Mail for iPhone](#)

These comments on the Pohakuloa Training Area (PTA) final EIS are based on review of my comments and responses on the 2022 draft EIS. See pages D-140 to D-144 of Appendix D of Volume II of the PTA final EIS for my complete set of comments.

submitted by email to BLNR on 7 May 2025 by Michael Jones

The most serious deficiencies concern depleted uranium from tests of the Davy Crockett weapon. Documents that contain information about Davy Crockett test ranges and analysis of soil samples were not reviewed. Limitations of soil sampling and recommendation for a more detailed survey in range 11T were not addressed. The large gamma count rate in 5 locations in range 11T was not mentioned.

Photos of SRBs in range 11T were not included.

I) inadequate responses about Davy Crockett ranges

II) information about Davy Crockett missing from maps

III) limited information on soil samples

IV) other information from the (CABRERA, 2009) report not in the EIS

V) scope of EIS

VI) excluding area of 2022 lava flow from Army training

I) inadequate responses about Davy Crockett ranges The final EIS does not contain maps in which ranges used for Davy Crockett tests are identified. These ranges are identified in the (CABRERA, 2009) memo cited on the 2010 PTA Baseline Human Health Risk Assessment (BHHRA). However the CABRERA memo is not cited in the final EIS and apparently was not reviewed for it.

The (CABRERA, 2009) memo is at

[https://urldefense.com/v3/https://www.nrc.gov/docs/ML0929/ML092950352.pdf ;!!LIY SdFfckKA!1L-UDKcQHdsr_Mrd2iamWhjIA0-hF9dH3bp8rLkrBh7dDJDlojw1-aL_lfz2aS59wS9dx70M_opF99lsbo6aLqBwg\\$](https://urldefense.com/v3/https://www.nrc.gov/docs/ML0929/ML092950352.pdf)

It has a U.S. NRC cover page dated 16 Oct. 2009 and a title page by Cabrera Services dated 24 July 2009. The Technical Memorandum for PTA Aerial Surveys Map in Fig. 2-2 shows DC Area #1 (range 17), and ranges 13+14, 11T, and 10.

****EIS Responses to Comment I vv**

The State-owned land only contains a portion of a firing location for one of the four former Davy Crockett ranges. Section 3.5.4.12 identifies this firing location as being Range 13 on Training Area 9, which is visible on Figure 1-3.

---vv--My comments on EIS responses ---- vv

Fig. 1-3 shows Training Area 9 but not Range 13. However, the Technical Memorandum for PTA Aerial Surveys Map in Fig. 2-2 shows DC Area #1 (range 17), and ranges 13+14, 11T, and 10. A map which clearly shows

MJ>locations of all Davy Crockett ranges is needed.

---^^--My comments on EIS responses ---- ^^

****more EIS Responses to Comment I vv**

A summary of health and risk assessments from past use of depleted uranium at PTA is described in the EIS. Individual soil sampling results and locations are not necessary to assess the impacts from continued use of the State-owned land. Surveys did not identify any indication of depleted uranium-containing materials on the State-owned land.

Surveys, sampling, and existing conditions of areas that are outside of the State-owned land and would not be impacted by continued use of the State-owned land (e.g., Range 11T) are outside the scope of the EIS.

****more EIS Responses to Comment I ^^**

II) information about Davy Crockett missing from maps Fig. 1-3 on page 1-14 shows training areas and other features .

Existing ranges adjacent to TAs 7,8,9 and along boundary of TA 21 are outlined in black but not identified by number. Fig. 2-1 on page 2-5 is a large fold-out map which identifies PTA training areas by number but does not show Davy Crockett ranges. The Summary of Existing Site Data in BHHRA section 3.0 lists potential Davy Crockett ranges as 10, 11T, 14

and 17 with 11T most likely to have SRB. These ranges are not identified in the final EIS. The second paragraph on page 3-118 states that Davy Crockett was fired partially from State-owned land from one (range 13 on TA 9) of four ranges.

The other ranges are not identified in the EIS and none of the maps show the location of range 13. However, Fig. 2-2 in the (CABRERA, 2009) report shows 9 sampling locations and DC areas superimposed on a satellite photo. DC Area #1 (range 17) and ranges 13+14, 11T, and 10 are shown. The sampling locations are: 2 on range 13+14, 2 outside range 11T, 3 inside 11T,

2 on range 10 Table 2-1 contains U-233, U-235, U-238 levels in 9 soil samples.

The map and table should be included in the final EIS. A version of the map in good focus should be obtained.

**EIS Responses to Comment II vv

The State-owned land only contains a portion of a firing location for one of the four former Davy Crockett ranges. Section 3.5.4.12 identifies this firing location as being Range 13 on Training Area 9, which is visible on Figure 1-3.

A summary of health and risk assessments from past use of depleted uranium at PTA is described in the EIS. Individual soil sampling results and locations are not necessary to assess the impacts from continued use of the State-owned land. Surveys did not identify any indication of depleted uranium-containing materials on the State-owned land. Surveys, sampling, and existing conditions of areas that are outside of the State-owned land and would not be impacted by continued use of the State-owned land (e.g., Range 11T) are outside the scope of the EIS.

**EIS Responses to Comment II ^^

III) limited information on soil samples The EIS responses to my comments about soil samples assert " Surveys did not identify any indication of depleted uranium-containing materials on the State-owned land." This is the basis for the conclusion that current land use does not present a human health hazard.

The following text from the BHHRA indicates limitations of existing data on DU and recommends a survey of range 11T. "The visual and scanning surveys did identify non-oxidized metal fragments, partial spotter round bodies, and Davy Crockett system components on Range 11T consistent with DU and the Davy Crockett weapons." "While the

soil samples collected around the perimeter and impacted areas of the range did not indicate the presence of DU, these data do not represent a statistically significant data set. A statistical field sampling design focused on the suspect Davy Crockett impact areas would hopefully yield more representative results. However, due to the general lack of the presence of traditional well developed soil, slightly weathered or unweathered volcanic rock predominates in some locales; thus, obtaining traditional soil samples typically used for risk assessment purposes will be problematic. CABRERA recommends that the Army attempt to conduct a characterization survey of the most impacted range (11T), with an emphasis on statistical sampling, defining the environmental characteristics of the impacted area, eliminating pathways, where possible, from further evaluation, and developing better statistically based data."

The response does not address whether the survey of range 11T recommended by CABRERA in the BHHRA had been done.

IV) other information from the (CABRERA, 2009) report not in the EIS PTA surveys were done by CABRERA from 10/28/2008 to 12/12/2008. Among the relevant information are the following:

Fig. 3-1 shows ranges and impact area south of TAs 5, 7-9, and 12-13.

Table 4-1 gives uranium levels in 20 surface soil samples in ranges 10, 11T,

and 17 taken near DU fragments and finds in 10 and 11T.

Photo 4-1 : mostly intact SRB found on 11T with intact explosive Photo 4-2 : partial SRB found on 11T with fin assembly Gamma Walkover Surveys (GWS) found 5 locations in the BAX construction area of 11T with count rates 34000 to 44000 cpm compared to area norm of

2500 cpm.

Fig. 4-3 shows GWS coverage for BAX, 10, and 11T.

Fig. 4-4 shows GWS results and color-coded cpm levels.

Fig. 4-5 shows GWS results and color-coded cpm levels for BAX, 10, and 11T.

The EIS response is

"The status of Davy Crockett components and depleted uranium testing in U.S.

Government-owned land not impacted by continued use of the State-owned land is beyond the scope of the EIS."

---vv--My comments on EIS responses ---- vv The EIS notes on page 3-119 that the Nuclear Regulatory Commission (NRC) license for the Army to possess DU "does not distinguish between

State-owned land and U.S. Government-owned land." Because the Army

is responsible for all DU at PTA, it should address impacts for all of PTA. It seems important to address the SRBs found on 11T and the large gamma count rates in 5 locations on 11T.

---^^--My comments on EIS responses ---- ^^

V) scope of EIS

Several responses to my comments involving DU not on state-owned land assert that this is "outside the scope of the EIS." However, the EIS notes on page 3-119 that the Nuclear Regulatory Commission (NRC) license for the Army to possess DU "does not distinguish between

State-owned land and U.S. Government-owned land." Because the Army

is responsible for all DU at PTA, it should address impacts for all of PTA.

VI) excluding area of 2022 lava flow from Army training The November-December 2022 lava flow from the Mauna Loa eruption seems to have entered PTA. To allow studies of this area, it should be excluded from Army training.

Finally, I would like to thank the Army Public Affairs Office for sending a printed copy of Volumes I and II to me.

To the Board of Land and Natural Resources on Agenda Item D-1:

The Army's FEIS ignores decades of Native Hawaiian pain and trauma caused by the destruction of sacred lands at Pōhakuloa. Without proper consultation or cultural surveys, the military continues to disrespect our laws and people. I respectfully urge the Board to reject the Army's FEIS and uphold your duty to protect Hawai'i's land, culture, and people.

Respectfully,

Lisa Ka'aekuahiwi

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Jasmine Makanani Ka'ahanui

Wai'akahi'ula, Hawai'i

Kanaka Maoli

808-853-9811

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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The time to act is now. Reject this IS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

We As Kanaka Are Tired Of Seeing Our Aina Being Desecrated. When Will It Be ENOUGH. NEVER!!!

Ua Mau ke Ea o ka 'Āina i ka Pono

ALOHA

Me ka 'oia'i'o,

Cameron Nephi Kahakai

Waimanalo Beach, Oahu

[Kanaka Maoli / Cultural Practitioner /

ckahakai001@gmail.com

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

Aloha mai kākou,

My name is Brytni Kalei K-aloha, and I respectfully urge you to do the right thing and reject the clearly insufficient FEIS in Item D-1.

Native Hawaiians have long borne a disproportionate burden in witnessing the sacred ‘āina of Pōhakuloa be bombed, poisoned, and desecrated for generations. Even the U.S. Congress, in the 1993 Apology Resolution, acknowledged the unique and inseparable relationship between the well-being of the Hawaiian people and our ‘āina. Despite this, the FEIS fails to account for the profound psychological, spiritual, and physical harms that will continue to be inflicted particularly on the Native Hawaiian community if our calls for justice, healing, and reconnection with our ancestral (and illegally occupied) lands at Pōhakuloa are ignored for another 65 years or more.

I also want to emphasize that the military’s continued misuse of land in Hawai‘i has played a direct role in displacing our people. We are now witnessing more and more of our own being forced out of our homelands, while migrants and immigrants are being housed in spaces that should be safe and sacred for Kanaka ‘Ōiwi. If this cycle continues, where will we go as Hawaiians? Where will we be allowed to thrive? The so-called “compromise” being asked of us is not a compromise at all. It is a sacrifice of our health, our lands, and our overall well-being for the purposes of ongoing military use. This is not acceptable. Especially when we now have a U.S. President and administration that claims to stand for peace, diplomacy, and healing, not war. If that is truly the stance of our national leadership, then why allow the continued militarization and destruction of our sacred places?

Please reject this FEIS. Demand full accountability from the Army for the irreparable harm it has caused and will continue to cause under its current proposal. Stand with justice. Stand with ‘āina. Stand with the lāhui.

Me ka ‘oia‘i‘o,

Brytni Kalei K-aloha

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Brytni Kalei K-aloha

Pronouns: she/her/'o ia

Kahikolu Enterprise LLC

Co-Founder

Ekolu Mea Nui

Co-Executive Director

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Instagram: @ekolu.mea.nui

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Aloha e Chair Chang and Esteemed Committee Members,

We write today as a concerned Kanaka Maoli and steward of this 'āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for

destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Keawe Kaluhiwa

Kaneohe, Oahu

Aloha Kakahiaka,

Please reject the Army's Environmental Impact Statement for their lease renewal of Pohakuloa. The State of Hawai'i and BLNR has already recognized the environmental impact live fire training has on the environment, the communities surrounding it, and the future generations. The State gave Kaho'olawe back because of this, Mākua Valley also. Please continue to do what is right by giving Pohakuloa back to Hawai'i to be cared for by the people for future generations and for the health of our people and islands.

Mahalo nui,

Māhealani Kamau

Aloha,

My name is Lauren and I would like to submit my testimony in denial of the renewal request for the US military to continue to desecrate the land any further. Many native plants up at that altitude are rare, mostly only found in one area of this beautiful island I call home and they've polluted it with their weapons and there's even video evidence of a military officer stating that they do not clean up any of their weapons shells in the impact zone and haven't done so in many years. It's high time they are put to a stop so we can preserve what's left there for future generations to see and be reminded that Hawaii is not a target practice zone, its home.

I want to speak bluntly and say that allowing this to happen any further would leave more devastating effects on the land, its high time we take back what land is ours and restore it to the way it was before any of this came to pass. I look forward to hearing the results, knowing I used my voice to speak up on behalf of those who also seek the same result so I ask you to please, deny the military service anymore time there then what's left on their contract and to allow Pohakuloa to breathe after so many years of this desecration.

Much warm regards and respect,

Mahalo for hearing my words. Aloha.

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

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future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha ‘āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o

Tiana Coby-ann Lehua Ka'ōlelopono

Honolulu, Oahu, Hawai'i

Kanaka Maoli / Cultural Practitioner /

Aloha Members of the Board of Land and Natural Resources,

My name is Isobel Donnelly, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Isobel Donnelly

Kapa'a, Kaua'i

Regarding Agenda Item D-1, I find the Army's refusal to comply with basic environmental requirements deeply troubling. You must hold them accountable and reject this FEIS.

Ryan Kauanui

808-778-6160

871 Uakanikoo St.

Wahiawa, HI 96786

To:

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Department of Land and Natural Resources

& Honorable Committee Members

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I personally have been affected by the military's continued negligence in managing used and unused ammunition and have suffered from it most of my life. This needs to end. The Impact of these metals and contaminants in our soil and ground waters can have larger ripples in our environment and our people.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

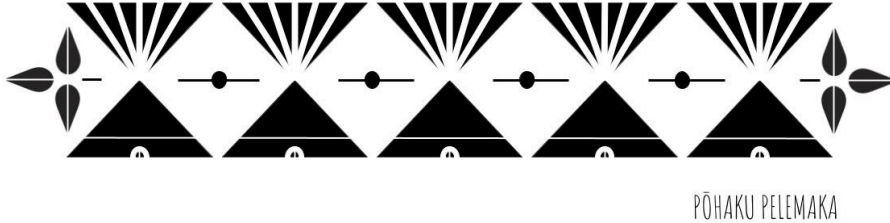
Kristine Aiko Kawakami

Honolulu, O'ahu

Nursery and Restoration Manager

Ailoveagriculture@gmail.com

808-294-8746



13-3749 Old Kalapana
Road
Pahoa, Hawaii 96778
(808) 965-6585
leila@pohakupelemaka.org
EIN 46-2653495

May 6, 2025

Re: BLNR Testimony, May 9, 2025: Agenda Item D- 1:
Decision Making Regarding the Acceptance or Non-Acceptance of the Final
Environmental Impact Statement (EIS) for the Army Training Land Retention at
Pōhakuloa Training Area, Island of Hawai'i, Tax Map Keys (TMKs) (3): 4-4-015:008; 4-
4-016:005; and 7-1-004:007

To Whom it May Concern,

Pōhaku Pelemaka, 501c3 non profit is in strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training area, and we urge the land board to reject the Army's EIS. Pōhakuloa is a wahi pana and it deserves your recognition that it is so.

The bombing and military training at Pōhakuloa has caused environmental degradation (habitat destruction, pollution, wildfires) and cultural harm (desecration of sacred sites, severed connections to 'āina, disrupted practices). Many Native Hawaiians see these impacts as part of a broader pattern of environmental injustice and cultural erasure tied to militarization.

Environmental Impacts

1. Habitat destruction and degradation

- Pōhakuloa is home to **rare, endemic, and endangered species** (plants and animals found nowhere else on Earth), such as the palila bird and several native plants.
- Bombing, fire, and military maneuvers destroy critical habitat and prevent natural regeneration of native ecosystems.
- Invasive species (like fountain grass) spread more easily in disturbed landscapes, increasing fire risk and outcompeting native species.

2. Soil contamination and erosion

- Military activities can release **heavy metals** (like lead, depleted uranium, cadmium) into the soil.
- Bomb craters disturb the fragile volcanic soils, leading to erosion and dust pollution, which affects air quality and contributes to sedimentation in watersheds.

3. Chemical and radiological pollution

- Reports confirm that **depleted uranium (DU)** rounds were used in the past at Pōhakuloa. DU is radioactive and chemically toxic, raising concerns of long-term contamination.

- Persistent pollutants may enter groundwater systems or blow as dust across the island.
- 4. **Wildfire risk**
 - Military exercises have caused **frequent wildfires**, burning thousands of acres of dryland forest and shrubland.
 - Fires damage native plants, accelerate invasion by fire-adapted grasses, and permanently alter ecosystems.
- 5. **Noise and vibration impacts**
 - Explosions and aircraft generate extreme noise pollution, disturbing wildlife and potentially altering animal behaviors and reproduction patterns.

Cultural Impacts on Native Hawaiians

1. **Desecration of sacred lands**
 - Pōhakuloa sits between Mauna Kea and Mauna Loa, two of Hawai'i's most sacred mountains. This region is considered a **piko (spiritual center)** connecting the heavens and the earth.
 - The area contains **cultural and archaeological sites**, including ancient trails, shrines (heiau), burials (iwi kūpuna), and petroglyphs. Bombing damages and destroys these irreplaceable cultural features.
2. **Disruption of ancestral practices and knowledge**
 - Native Hawaiians have been denied or have had limited access to traditional gathering sites, trails, or ceremonial areas within the military-controlled area.
 - Cultural practitioners argue that the destruction of landscape and ecological relationships interferes with **cultural continuity, spiritual practices, and kuleana (responsibility) to the land**.
3. **Loss of relationship to 'āina**
 - Pōhakuloa means "the long stone" and is traditionally associated with **mo'olelo (stories), migrations, and ancestral pathways**.
 - Ongoing military use is seen by many as an extension of colonial occupation, disconnecting people from their ancestral land and disrupting cultural stewardship.
4. **Health and well-being concerns**
 - Fears of radiation exposure, toxic dust, and contaminated food and water sources raise concerns for Native Hawaiian communities living downwind or downstream of PTA.
 - The **potential harm to present and future generations** is viewed as not only a public health issue but a violation of cultural rights.

Pōhaku Pelemaka's mission is to protect, perpetuate, and enhance: the intrinsic qualities of the lower Puna area, Native Hawaiian wellbeing, and the transmission of intergenerational knowledge and practices in partnership with 'ohana (family), county, state, government, public and private sectors.

Vision

Pōhaku Pelemaka's educational, charitable and scientific purpose is to Aloha 'Āina (reconnect, study, steward, protect, enhance, maintain, and celebrate) the lower Puna areas, the communities, and natural resources through culturally grounded programs and partnerships.

Our water comes from Mauna Loa that houses Pōhakuloa. For generations, our waters have been polluted from the Military actions that have taken place. Water is life!

We appreciate your time and consideration for listening to the voices of our people and we strongly urge the land board to reject the Army's EIS for land retention of Pōhakuloa.

Mahalo,

A handwritten signature in black ink, appearing to read 'Leila', with a stylized flourish at the end.

Leila Kealoha
Executive Director, Pōhaku Pelemaka
13-3749 Old Kalapana Road
Pahoa, HI 96778
(808) 937-7991
leila@pohakupelemaka.org

Aloha kākou, o wau 'O Devin Kahale Alii Keanaaina. He kupa no ka 'āina o Kona a'u. Noho au i ka poli o Hualālai i ka wahi o Kalaoa Kona Akau. A laila, eia ku'u palapala kū'ē noho'i

I experienced traumatic times as a young child being awoken or startled by the quakes and sounds of the bombing of Pōhakuloa. All the way on Hualalai Mountain in Kalaoa North Kona. Large enough to shake our house.

You hear the stories of Kupuna witnessing WWII and can't help but have your mind race to that extreme. Even at that time, I wondered how can this be allowed.

Now as an adult and Kumu of Hālau Nā Lei Ha'aheo Kona, it is my passion and Kulana to educate my Olapa. We have spoken to the Haku Mele (my cousin) Gary Haleamau; about the composition of his Mele for Pohakuloa. And shared the stories of when he and his Ohana would frequent the lands that boarder Hualalai and Pohakuloa.

I have taken my haumana to Pōhakuloa multiple times to pule, and share our hula in this sacred place.

Just a few years ago with the eruption of Mokuaweoweo.... 9 acres of the military camp was taken. I feel it is a direct hō'ailona or sign..... it is time. Our people, Kupuna, ancestors, and even nature in the myriad forms of Tutu Pele have given their stance. Enough is enough.

I have often been asked by visitors and government officials in different instances, "where in Hawaii is it still sacred?" To which I reply. "Every grain of sand, every speck of dust, to the tallest tree of the highest mountain in to the depths of the Moana. This to our people is sacred! Every part of it, in and out!"

Therefore I stand in opposition of the renewal of this lease to the military and urge them restore, renew, and return Pohakuloa to its people.

Me ka mahalo piha (With the fullness of gratitude) - Alii

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhaku‘loa begin.

Me ka ‘oia‘i‘o,

Anyssa Keli’ikipi

Waianae, HI.

Kānaka Maoli

Aloha Members of the Board of Land and Natural Resources,

My name is Spencer Kelly, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

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The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Spencer

Captain Cook, Hawaii

--

Spencer Kelly

Freelance Creative Director

+1 (503) 805 4054

spencerjosephkelly.com

(he/him/his)

Sent from my iPhone

My name is Robyn Kneubuhl and I am totally against the Army desecrating Pōhakuloa. The precious water and land must be protected. Leasing this land at a dollar a year and leaving behind exploded and unexploded ordinance is unacceptable.

Please reject the EIS and do not renew the lease.

Mahalo,

Robyn Kneubuhl



1003 Bishop Street • Pauahi Tower • Suite 2630 • Honolulu, HI 96813

Phone: (808) 532-2244

May 6, 2025

Chairperson Dawn Chang and Members of the Board
Board of Land and Natural Resources
State of Hawai'i
1151 Punchbowl Street, Room 132
Honolulu, HI 96813

Board of Land and Natural Resources Meeting: May 9, 2025

RE: Testimony in Support of the Draft Environmental Impact Statement (EIS) for Army Training Land Retention at Pohakuloa Training Area

Dear Chairperson Chang and Members of the Board:

My name is Gary Kai, and I am the Executive Director of the Hawai'i Business Roundtable, an organization committed to advancing Hawaii's economy and quality of life. I am submitting this testimony, on behalf of the Members of the Hawaii Business Roundtable, in *strong support* of the Army's Draft Environmental Impact Statement (EIS) and the retention of training lands at Pohakuloa Training Area (PTA).

Strategic Importance to U.S. Indo-Pacific Command (USINDOPACOM)

The Pohakuloa Training Area is an indispensable asset for the readiness of U.S. Indo-Pacific Command and its associated combatant commands. In the face of evolving geopolitical tensions and the need to maintain peace and stability in the Pacific, PTA offers a rare and vital location for joint, combined, and multi-domain training that replicates the complexities of regional combat environments. No other training area within Hawaii or across the Pacific possesses the scale, varied terrain, and proximity to USINDOPACOM headquarters to meet these mission-critical requirements.

The ability of Army, Navy, Marine Corps, Air Force, and allied forces to train together at PTA ensures operational readiness and deterrence capability across the Pacific. This is not solely about Army training—it is about safeguarding regional security and ensuring that our service members are prepared to defend national interests.

Essential Resource for Hawaii's First Responders

PTA is not only a military resource but also a critical training ground for Hawaii's first responders, including fire, police, and emergency medical services. The scale and flexibility of the training area enable realistic, coordinated exercises that prepare these essential personnel for natural disasters, search and rescue operations, and large-scale emergency response. With Hawaii's vulnerability to hurricanes, wildfires, and other hazards, maintaining PTA ensures that our local first responders are equipped with the best possible training environment to safeguard our communities.

Significant Economic Contributions to Hawai'i

The military is one of Hawaii's key economic pillars, contributing billions annually to our state economy. The Army's continued presence and investment through PTA support thousands of local jobs and stimulate businesses throughout the islands. More than just a defense presence, the military's economic impact reaches deep into our communities.

Organizations like the Joint Venture Education Forum (JVEF) exemplify the military's broader contributions to Hawaii. Through JVEF, the Army partners with Hawaii's Department of Education to improve public school facilities, support military-connected students, and provide resources that benefit all keiki (children) in Hawaii's public education system. Retaining PTA ensures that this partnership continues to flourish, enhancing the lives of Hawaii's families.

Critical Role in Disaster Response and Recovery

The Army's presence at PTA is also vital in times of crisis. During disasters such as wildfires, hurricanes, or volcanic eruptions, the military provides unmatched logistical support, manpower, and resources to assist in response and recovery efforts. The Army's capacity to mobilize rapidly and operate from PTA strengthens Hawaii's resilience and recovery capability when our communities face emergencies.

Conclusion

The retention of the Pohakuloa Training Area is essential for national security, Hawaii's public safety, and our state's economic well-being. I urge the Board to approve the Draft EIS and support the continued use of this critical training land.

Mahalo for the opportunity to testify on this important issue.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary K. Kai". The signature is fluid and cursive, with the first name "Gary" being the most prominent.

Gary K. Kai
Executive Director

Hawai'i Business Roundtable

I AM WRITING TO VEHEMENTLY OPPOSE ITEM D-2 ON THE AGENDA FOR THE
UPCOMING BLNR MEETING. THIS ITEM,
WHICH PERTAINS TO THE APPRAISAL OF LANDS LEASED BY THE UNITED STATES
ARMY,
THREATENS THE INTEGRITY OF OUR PRECIOUS HAWAIIAN
LANDS AND THE WELL-BEING OF OUR COMMUNITIES.

IT IS TIME FOR THE UNITED STATES ARMY TO HONOR ITS ORIGINAL AGREEMENT
MADE AT THE END OF WORLD WAR II THEY HAVE HAD THE USE OF THESE LANDS
FOR OVER 80 YEARS UNDER THE PROMISE OF RETURNING THEM IN THEIR
ORIGINAL CONDITION. IT IS LONG OVERDUE FOR THEM TO FULFILL THIS
COMMITMENT AND REPAIR THE DAMAGE THEY
HAVE CAUSED.

I URGE THE BLNR TO REJECT ITEM D-2 AND INSTEAD PRIORITIZE THE
PROTECTION OF OUR LANDS AND COMMUNITIES. WE MUST NOT SUCCUMB TO
PRESSURES TO EXPAND THE MILITARY FOOTPRINT IN OUR ISLANDS AND
INSTEAD WE SHOULD ALL FIGHT TO REDUCE THEIR FOOTPRINT. IT IS TIME TO
UPHOLD THE VALUES OF STEWARDSHIP AND
SUSTAINABILITY FOR THE BENEFIT OF PRESENT AND FUTURE GENERATIONS.
MAHALO.

Dawn Kulberg
RESIDENT OF Laupahoehoe

Aloha nui,

My name is Pililani Kyota, I am a 11th-grade student at Hālau Kū Māna. I am submitting this testimony in strong opposition to the Army's Final Environmental Impact Statement and any effort to renew military leases on Hawaiian lands.

I speak today as someone deeply connected to the 'āina of Hawai'i — to the mountains of Ko'olau, the streams that feed Kānewai, the shorelines of Maunalua Bay, and the wahi pana that raised me. These places have taught me what it means to care for the land, and what it looks like when the land is not cared for in return.

For decades, the military has used the islands of Hawai'i not with respect, but with violence. Areas like Līhu'e on Kaua'i, where native species once thrived, or Waikakalaua on O'ahu, where cultural sites have been damaged, have been sacrificed in the name of "training." On Hawai'i Island, Pōhakuloa continues to suffer from contamination, unexploded ordnance, and ongoing desecration. The impacts aren't just environmental — they're spiritual, generational, and deeply personal to those of us rooted in this land.

The FEIS fails to recognize this history and the harm that's still happening. It treats Hawai'i as a tool for military readiness, not a place of living culture, genealogy, and kuleana. It dismisses the voice of the people and the 'ike of this land. It makes it clear that the goal is not restoration — it's control.

I'm not asking for a better deal or more promises. I'm asking you to see what has already been lost, and to stop the loss from continuing. These lands are not the military's to renew. They are sacred. They are storied. And they deserve to heal.

I urge the Board of Land and Natural Resources and Governor Green to reject the FEIS in full, to end the negotiations, and to return these lands to a future defined by mālama, not militarization.

Ua lehulehu a manomano ka 'ikena a ka Hawai'i. Let us remember our 'ike, and let us act with courage.

Me ke aloha 'āina,

Pililani Kyota

11th Grade Student, Hālau Kū Māna

--

Pililani Kyota

Papa Lo'i
Hālau Kū Māna Public Charter School
2101 Makiki Heights Drive

Aloha members of the BLNR,

‘O Kaulana Lani ko‘u inoa, a no ‘Ualaka‘a mai au. I’m a 11th grade student from Hālau Kū Māna, and I’m writing to ask that you *do not* approve the Final Environmental Impact Statement (FEIS) or allow the U.S. Army to renew their lease at Pōhakuloa. I feel like this is a really important moment for all of us to think about the future of Hawai‘i and what kind of place we like live in.

The military has been using this land since 1964. They only paid one dollar to use 22,750 acres of state land for 65 years. That alone sounds unfair. But on top of that, they’ve been bombing the land, damaging the environment, and disrespecting a place that is sacred to Native Hawaiians. Pōhakuloa is right in between Mauna Kea, Mauna Loa, and Hualālai — this place has deep meaning and history. It's not just empty land.

There are endangered animals like the nēnē and Hawaiian bat that live there. There’s also Hawaiian plants, burials, and cultural sites. The land is supposed to be protected, but instead it's full of unexploded ordnance, and the military even used depleted uranium there. That's dangerous to the ‘āina and the people. How is this pono?

Even people in our own government — like the Office of Conservation and Coastal Lands and the Division of Forestry and Wildlife — said the military's use of Pōhakuloa doesn’t match with conservation laws. They also said public access and protection of resources is more important. That should mean something.

The Army says this lease is about “readiness,” but what about the readiness of our land? What about our ability to survive in the future if we keep letting outside forces destroy what we’re supposed to be taking care of?

Please choose the No Action Alternative. Do not approve the FEIS. Let Pōhakuloa heal. Mahalo for listening to my mana‘o and for thinking about what’s truly best for Hawai‘i.

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and to urge the land board to reject the Army's EIS.

Pōhakuloa is not just a piece of land—it is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. The Army has not demonstrated the capacity or will to serve as a proper steward of this land, and the FEIS fails to meaningfully address these concerns.

For example, the Army's actions have already resulted in the burning of nearly 20,000 acres, including designated critical habitat for native flora and fauna. This is unacceptable. Additionally, the ongoing use of live-fire and bombing in the impact area raises serious concerns about environmental contamination, safety, and long-term degradation of both the land and water.

Military training activities of this scale are simply not compatible with conservation, cultural integrity, or aloha 'āina. Enough is enough.

The EIS is insufficient and should be rejected on several grounds:

Inadequate Environmental and Cultural Impact Analysis

Lack of a sufficient plan to mitigate impacts to cultural and natural resources

Concerns about depleted uranium on the site have gone unaddressed

Military usage is incompatible with the conservation district designation

The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina

I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration.

Sincerely,

Kailey Lapenia
Puna, Moku o Keawe

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this 'āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No

mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Jordan Lee

Kaimukī, O'ahu

Concerned Kanaka Maoli, Small Business Owner

808-375-6601

yellowonyellow@gmail.com

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned resident, ohana to Kanaka Maoli and dedicated steward of this 'āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Mahalo nu nui,
Kelly M. Lengel
Kealakekua, Moku O Keawe
808-443-4478

[Sent from AOL on Android](#)

To: Chair Dawn Chang

Department of Land and Natural Resources& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned resident of Hawaii to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area.

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

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despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

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deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka ‘oia‘i‘o,

April Leventhal

Pukalani, Maui

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

My name is William Reese Liggett and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1.

Native Hawaiians have long borne a disproportionate burden in watching Pōhakuloa's sacred 'āina be bombed, poisoned, and desecrated - for generations. The US Congress itself, in the 1993 Apology Resolution, recognized the intrinsic and unique relationship between the well-being of the Hawaiian people and their connection to 'āina. Yet the FEIS fails to account for the deep psychological, spiritual, and physical harms that will continue to be borne by the Native Hawaiian community in particular, should their demands for justice, healing, and reconnection with ancestral (and illegally stolen) 'āina at Pōhakuloa be ignored for another 65 years or longer.

Please reject this FEIS, to ensure that the Army fully accounts for the harms it has and will continue to inflict with its "retention" proposal, including to the Native Hawaiian community.

And do realize that however the final lease reads, the state must enforce the lease terms by periodical inspection and requirement for lease compliance and reparations for lease deviations, or else the operations-bent of the lessee's personnel will result in damage to the 'āina and its cultural features.

Mahalo nui for the opportunity to testify.

Sincerely,

Reese Liggett

William Reese Liggett Help Protect and Recover the Natural & Cultural Features of Wāwāmalu Beach!

808 732 4489r 808 222 2088c



TO: Board of Land and Natural Resources
Chairperson Dawn N.S. Chang
Kalanimoku Building
1151 Punchbowl Street
Honolulu, Hawai‘i 96813

FROM: Zach Lockwood
zlock@hawaii.edu

DATE: May 7, 2025

RE: Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai‘i

Aloha Chairperson Chang and Members of the Board,

My name is Zach Lockwood. I am a Honolulu resident and a third-year law student at the William S. Richardson School of Law. I respectfully request the Board of Land and Natural Resources decline acceptance of the United States Army’s Final Environmental Impact Statement (FEIS) for the proposed lease renewal at Pōhakuloa Training Area (PTA). The document fails to satisfy the disclosure requirements of Hawai‘i Revised Statutes (HRS) chapter 343 as further required under Hawai‘i Administrative Rules (HAR) chapter 11-200.1. Specifically, the FEIS omits essential groundwater data and as a result, fails to analyze key munitions constituents (MCs) that pose risks of groundwater contamination.

The United States Army Garrison-Hawai‘i (USAG-HI) identifies the region of influence for water resources as the Northwest Mauna Loa and West Mauna Kea aquifer sectors,¹ and explains that both aquifers contain fresh groundwater, are suitable for drinking, and are highly vulnerable to contamination.² Despite these acknowledgements, the USAG-HI bases its groundwater conclusions on two wells drilled in the 1960s, the exact locations of which are ambiguous, and two recently drilled wells located only in the West Mauna Kea aquifer system. No monitoring occurs down-gradient of the live-fire “Impact Area” within the Northwest Mauna Loa sector. By extrapolating sparse up-gradient data to the entire region, the USAG-HI concludes that surface water–groundwater connectivity in the area is insignificant in the area, which overlooks the structurally complex subsurface flow dynamics of the West Hawai‘i aquifers.³ In fact, recent

¹ The Anaeho‘omalu and Waimea aquifer systems, which the USAG-HI also references in the FEIS, comprise the entirety of the Northwest Mauna Loa and West Mauna Kea aquifer sectors, respectively. JOHN F. MINK & L. STEPHEN LAU, WATER RES. RSCH. CTR., *AQUIFER IDENTIFICATION AND CLASSIFICATION FOR THE ISLAND OF HAWAI‘I: GROUNDWATER PROTECTION STRATEGY FOR HAWAI‘I* 16-17, 23 (1993).

² U.S. ARMY GARRISON–HAWAI‘I, ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA, FINAL ENVIRONMENTAL IMPACT STATEMENT, VOLUME I: EIS DOCUMENT 3-189 (2025) [hereinafter FEIS].

³ See HERBERT A. PIERCE & DONALD M. THOMAS, MAGNETOTELLURIC AND AUDIOMAGNETOTELLURIC GROUNDWATER SURVEY ALONG THE HUMU‘ULA PORTION OF SADDLE ROAD NEAR AND AROUND THE PŌHAKULOA TRAINING AREA, HAWAI‘I 9 (2009) (“In recent years, research and groundwater wells have demonstrated that the island hydrology is much more complex and that much larger quantities of water are stored within Mauna Kea

research “support[s] the interpretation of the Kīholo region as a preferential drain for *modern recharge* in the Humu‘ula Saddle region.”⁴ This finding directly contradicts USAG-HI’s assertion “that minimal direct recharge occurs to these aquifers from infiltration of rain that falls on these lands.”⁵

The USAG-HI also minimizes the role of surface runoff as a contaminant pathway to groundwater resources. It asserts that non-point pollutants from live-fire training have “less than significant impact” on groundwater because they will dilute or biodegrade during infiltration,⁶ yet the munitions section elsewhere concedes that “[m]obilization of MCs typically occurs from surface water flow” and “can infiltrate to groundwater.”⁷ This internal inconsistency is not resolved by data and disregards research by the Humu‘ula Groundwater Research Project, an effort initiated in partnership with the Army, which suggests that the hydrogeology of Mauna Kea’s flanks “may have implications for transport of recharge to the ‘basal’ groundwater system on its coastal flanks.”⁸ Rather than investigate, the USAG-HI “recommends additional testing” of a newly discovered perched aquifer located at one of the two remaining existing wells in the area,⁹ thereby acknowledging that critical hydrogeologic questions remain unanswered.

By failing to install down-gradient wells and ignoring the potential risks MCs pose to groundwater, the FEIS does not “adequately disclose and describe” groundwater impacts as HAR section 11-200.1-28(b) requires.

For these reasons, I ask the Board to withhold acceptance of the FEIS unless and until the Army installs monitoring wells down-gradient of the Impact Area, analyzes groundwater for the full suite of applicable munitions constituents,¹⁰ and incorporates the latest hydrogeologic findings into a comprehensive fate-and-transport model.

Respectfully submitted,

Zach Lockwood

and possibly other volcanoes on the Island of Hawaii.”); SCOT K. IZUKA ET AL., *VOLCANIC AQUIFERS OF HAWAI‘I—HYDROGEOLOGY, WATER BUDGETS, AND CONCEPTUAL MODELS* 103 (2018) (explaining that “confirmation of the perched condition is problematic”).

⁴ Joseph K. Fackrell et al., *Stable Isotopes of Precipitation and Groundwater Provide New Insight into Groundwater Recharge and Flow in a Structurally Complex Hydrogeologic System: West Hawai‘i, USA* 28 *HYDROGEOLOGY J.* 1191, 1201 (2020) (citation omitted) (emphasis added).

⁵ FEIS, *supra* note 2 at 3-193.

⁶ *Id.* at 3-190.

⁷ *Id.* at 3-115.

⁸ Donald M. Thomas et al., Presentation at American Geophysical Union Fall Meeting, San Francisco, California: New Insights into the Influence of Structural Controls Affecting Groundwater Flow and Storage Within an Ocean Island Volcano, Mauna Kea, Hawai‘i (Dec. 16, 2015), <https://agu.confex.com/agu/fm15/webprogram/Paper84879.html>.

⁹ *Id.* at 3-194.

¹⁰ At minimum, this should include investigations into persistence of RDX, HMX, perchlorate, and metals in groundwater resources.

To BLNR,

I am afraid that this testimony will fall upon deaf ears, but nevertheless, I am submitting this with the hopes that you will listen in earnest. The lease of Pōhakuloa should not be renewed. I have been driving on the highway coming from Kona to Hilo and witnessed an ordinance projected over the highway I presume as part of their training. I felt that I was at risk of harm when this occurred. I presume this was an accidental release as I cannot imagine that it was purposeful to shoot over a traveled highway. Regardless, I witnessed this reckless behavior first-hand. I've also been in Mauna Kea Park when ordinances have gone off, shaking the ground throughout the area. America needs to bomb its own land in America if they need to train! These lands belong rightfully to the Hawaiian Kingdom. Under this belligerent occupation, BLNR bears the responsibility of stewardship of the land, therefore, you must hold the military accountable for cleaning up the unexploded ordinances as well as the depleted uranium left by the shelling of the land, before considering any type of lease renewal. Failure to do so would be a failure of your responsibility. Pōhakuloa is NOT a waste land, it is sacred to Kanaka Maoli, and in your role as BLNR, you are called to honor that.

Further, I urge you as BLNR board members to reject the American Military's EIS. The EIS does not address the environmental & cultural impacts to the area as the Army has not shown themselves to be willing or able to be proper stewards of the land. They display themselves as entitled to the point of being oblivious to the community. The DLNR & the OCCL both found that the military's use of Pōhakuloa is not consistent with the conservation land use. Please reject the EIS & never renew the lease for the military to destroy the land & poison our air & water.

--

Mahalo,

Steve Loo

(808)216-7100

Aloha Board of Land and Natural Resources,

My name is Elilai Louch, a junior at Hālau Kū Māna. I am submitting this testimony in strong opposition to the Final Environmental Impact Statement (FEIS) for the proposed renewal of military leases on Hawaiian lands, at Pōhakuloa. I also call for an immediate and permanent end to all negotiations regarding renewing these leases, which are set to expire in 2029.

In 1964, the State of Hawai‘i leased over 29,000 acres of public lands, many of them so-called “ceded lands,” to the U.S. military for the outrageous sum of \$1 per year. This decision enabled the military to conduct destructive live-fire exercises, destroy sacred lands, and leave behind unexploded ordnance and depleted uranium. Which is very detrimental to the Hawaiian population in the area, not only their environment and cultural, but also self. Depleted uranium is very harmful to the human body. It will alter the DNA of the people who ingested it. It will also effect the many generations to come.

This is not about negotiating a better deal. There is no amount of money that can justify the continued desecration of aina. These lands are not vacant training grounds, they are sacred, storied, and irreplaceable. Like Kaho‘olawe before it, these lands must be returned to the people and to the earth. Enough is enough. I urge the Board of Land and Natural Resources and Governor Green to honor their commitments to future generations and reject the FEIS in full. End all negotiations. Restore the ‘āina. Return what was never freely given. Again, I am submitting this testimony in strong opposition to the Final Environmental Impact Statement (FEIS) for the proposed renewal of military leases on Hawaiian lands, at Pōhakuloa.

Me ka ha‘aha‘a,

Elilai Louch

elilai.louch@halaukumana.org

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Elilai Y. Louch

Hālau Kū Māna Public Charter School

Grade 11

Papa Lo‘i Project

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

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Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR’s kuleana to mālama ‘āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

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The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for

destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'ōia'i'o,

Marina Mainard

Kilauea Kauai HI

9165477256

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Rachael Kamalei Malapit

Kealakekua, Hawaii

Kanaka Maoli

8084829348

Aloha Chair and Members of the Board of Land and Natural Resources:

I am writing to urge the Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (FEIS) regarding the retention of approximately 22,750 acres of state-owned conservation land at Pohakuloa Training Area (PTA) when the current lease expires in August 2029.

The Army's FEIS fails to adequately address significant environmental and cultural concerns that must be prioritized over military interests. As stewards of state lands held in public trust, the BLNR has a responsibility to protect these lands for future generations, not continue a harmful arrangement that began in 1964 when the Army obtained the parcel for a mere \$1.

Environmental Concerns

Pohakuloa is classified as a sub-alpine tropical dryland forest—one of the world's rarest ecosystems. This irreplaceable land provides critical habitat for the endangered nēnē (Hawaiian goose), the 'ōpe'ape'a (Hawaiian hoary bat), and numerous other endemic species found nowhere else on Earth. The FEIS acknowledges but fails to sufficiently mitigate potential harm to native species, water resources, and soil through live fire exercises and toxic contamination.

The Army's own documentation reveals a troubling history of environmental degradation: between 2012 and August 2024 alone, 96 fires were recorded on the parcel, burning approximately 19,328 acres. The FEIS itself predicts increasing wildfire risk due to climate change, yet proposes to continue activities that have repeatedly caused such fires.

Cultural Impacts and Legal Obligations

The Hawai'i Supreme Court ruled in 2019 that state officials failed to ensure the military upheld its duties to clean up Pohakuloa, finding that this failure harmed Hawaiian cultural interests. The Court explicitly stated that "as trustee, the State must take an active role in preserving trust property and may not passively allow it to fall into ruin." Approving the FEIS would directly contradict this legal ruling.

The FEIS acknowledges that continued military use would have "significant adverse impacts" on cultural practices and environmental justice but fails to propose adequate solutions. The Office of Conservation and Coastal Lands has stated clearly that the proposed use is inconsistent with Conservation District designations and state land use policy, concluding that the "no action alternative would provide the best benefits to the land, cultural resources and traditional Hawaiian practices."

Reasonable Alternatives

The Army has alternative training facilities available, while Hawai'i has only one Pohakuloa. Conservation and cultural restoration represent a more appropriate future for these lands. The FEIS fails to adequately consider full cleanup and restoration alternatives that would honor both the land's conservation status and its cultural significance.

The days of the military leasing culturally significant conservation lands for nominal amounts are over. The BLNR should reject this FEIS and require the Army to fulfill its existing lease obligations to clean up and restore the land to its original condition before the lease expires in 2029.

Conclusion

I respectfully ask the BLNR to:

1. Reject the Army's FEIS as inadequate and inconsistent with the land's conservation designation
2. Require complete removal of unexploded ordnance and environmental remediation of the leased lands
3. Fulfill the state's obligations as trustee by prioritizing environmental protection and cultural interests over military use
4. Pursue the "no action" alternative, which would best serve the land's long-term protection

The decisions you make today will determine whether future generations inherit protected, restored lands or lands further degraded by military use. I urge you to reject the FEIS and choose the path of environmental and cultural stewardship.

Me ka ha'aha'a, Carlos Manalo

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

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Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR’s kuleana to mālama ‘āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai‘i State Constitution, DLNR is legally bound to conserve and protect Hawai‘i’s natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha ‘āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka ‘oia‘i‘o,

Eli marcotte

Kalihi, Oahu

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

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Me ka 'oia'i'o,

Bianca Martin

Kailua, Oahu

Aloha,

I'm writing to say that I plead the BLNR to REJECT the Army's Final EIS for Pohakuloa Training Area.

I say this because

1. The army openly admits on numerous occasions that bombings and training exercises causes widespread contamination and refuses to clean it up or even assess it
2. The army cannot prove that contamination hasn't already to the watershed and surrounding ecosystems.
3. The army won't share safety procedures or spill data and leaves out critical information
4. The Army's actions create fires, harms endangered species and harms local climate and the issues are dismissed without evidence
5. The Final EIS evades Hawaii law by ignoring obvious cumulative impacts.
6. The area is critical for the protection of federally listed endangered plant and animal species.

For these reasons I demand that the BLNR REJECTS, not simply doesn't act or accepts but FULLY REJECTS the Army's final EIS.

Mahalo,

Kirkland Keoni Mawae

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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Me ka 'ōia'i'o,

Jennifer K Mitchell

Kailua Kona, Hawaii

Kanaka Maoli

Gethawn@icloud.com

May 7, 2025

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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Me ka ‘oia ‘i ‘o,

Jordan Naihe

Kamuela, Hawaii

Kanaka Maoli

808-748-1205

[j naihe@gmail.com](mailto:jnaihe@gmail.com)

Aloha,

My name is Malia Nakamura. I respectfully submit this testimony to ask that you reject the FEIS for the continued military use of Pohakuloa. The document does not meet environmental, legal, or ethical standards expected on our Hawai'i Island. The Army's failure to consult "Aha Moku or meaningful analysis of cultural impacts is reason enough to reject the FEIS. The FEIS leaves critical questions unanswered about endangered species, iwi kupuna, and sacred sites. The most critical and concerning is the impact of the bombing that the Army has done for years right on the land that sits above the largest aquifer, an irreplaceable and most valued resource. The FEIS also ignores the relationship between Native Hawaiians and the 'Aina at Pohakuloa.

As a member of the community, I believe the BLNR has a constitutional duty to protect sacred lands, and also to protect cultural and natural resources for future generations. Therefore, I urge you to reject item D-1, the Final Environmental Impact Statement. Uphold your mission, the law, and the rights of the Hawaiian people.

Mahalo nui,

Malia Nakamura

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

My name is Laurel and I respectfully urge you to do the right thing and reject the clearly insufficient FEIS in Item D-1.

This FEIS disregards clear Hawai'i law, as even DLNR staff repeatedly point out in the staff submittal. The Army is not above the law, and yet they refuse to address basic legal requirements, such as analyzing the environmental and cultural impacts that will take place on federal lands, and completing basic surveys so that a true objective assessment can be made about the impacts of proposed military "retention" of 'āina in Pōhakuloa.

Please uphold the law, and your mission, and reject this incomplete and unlawful document.

Accordingly, I urge you to please REJECT the FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,

Laurel Nakanishi

Aloha kākou,

My name is Christian Navao-Auza. I am a Kanaka Maoli, an educator, and a parent. I am submitting this testimony in strong opposition to the Final Environmental Impact Statement (FEIS) for the proposed renewal of military leases on Hawaiian lands. I also call for an immediate and permanent end to all negotiations concerning these leases, which are set to expire in 2029.

We cannot ignore the history tied to these lands. In 1964, the State of Hawai‘i leased over 29,000 acres of public lands—many of them so-called "ceded lands"—to the U.S. military for just one dollar per year. This decision allowed for destructive live-fire training, the desecration of sacred sites, and the contamination of our ‘āina with unexploded ordnance and depleted uranium.

Places like Makua Valley, Pōhakuloa, Kahuku, Kawaiiloa, Pu‘uloa (Pearl Harbor), and Kapūkakī (Red Hill) have endured nearly 70 years of environmental harm and cultural disruption—all under the justification of "national defense." Yet, as the late Hawaiian leader George Helm once asked: *“What is national defense when what is being destroyed is the very thing the military is entrusted to defend?”*

This is not a matter of negotiating better terms. No financial offer can justify the continued desecration of our ancestral lands. These areas are not empty training grounds—they are sacred, storied, and irreplaceable. The damage already done is deep, and in many cases, irreversible. Renewing these leases sends a devastating message: that military power is more important than cultural preservation, environmental justice, and the rights of Native Hawaiians.

The FEIS fails to adequately address the long-term and cumulative impacts of military occupation. It disregards the historical trauma, cultural loss, and environmental degradation experienced by our communities. Decades of broken promises, failed stewardship, and lack of accountability have eroded public trust. There is no future worth building that begins with bombs and ends with more suffering.

We’ve seen this before. We will not repeat the mistakes of the past. Like Kaho‘olawe, these lands must be returned to the people and allowed to heal. Enough is enough.

I respectfully urge the Board of Land and Natural Resources and Governor Josh Green to reject the FEIS in its entirety. End the lease renewal negotiations. Restore the ‘āina. Return what was never freely given.

Mahalo,

Christian Navoa-Auza

--

C. Kalikiano Navoa-Auza

Halau Ku Mana Public Charter School

Grade 11

Papa Lo'i Project

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

My name is Lory Ono, and I respectfully urge you to do the right thing, and REJECT the clearly insufficient FEIS in Item D-1.

As the DLNR staff submission makes clear, the FEIS fails to include needed biological and archaeological surveys, turns a blind eye to environmental impacts on federal lands, and downplays obviously significant threats to endangered native birds and wildlife - among many other issues. Accepting this dangerously deficient document may accordingly result in actions that threaten the permanent and inadvertent loss of native species, iwi kūpuna, and historic properties, among other deep and immeasurable harms to the public interest.

Accordingly, please REJECT the FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,

Lory Ono

Aloha,

My name is Cyrus Ortogero, and I go to Hālau Kū Māna school in Honolulu. I am writing to ask you to say no to the Army's plan to keep using the land at Pōhakuloa for bombing and training.

A long time ago, in 1964, the State of Hawai'i let the military use over 30,000 acres of land for just \$1. That land is very special to Native Hawaiians. It has plants, animals, and sacred places that are important to our culture. But the military has used it for things like shooting, dropping bombs, and leaving behind dangerous weapons. That has hurt the land, the water, and the people.

The Army says they need the land for practice. But I believe the health of the land and the people is more important than more bombs. We need to protect the 'āina, not destroy it more.

The military has already done enough damage. We shouldn't let them stay longer. These lands are not theirs to use. They belong to the people of Hawai'i and to the future.

Please do the right thing. Say NO to the Army's plan. Help protect our 'āina and our culture.

**Mahalo,
Cyrus Ortogero
Hālau Kū Māna**

Aloha,

I'm writing to express my strong opposition to the U.S. Army's retention of leased lands at the Pōhakuloa Training area, and urge the land board of to reject the Army's EIS.

Pōhakuloa is not just a piece of land- it is a wai pani, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites, and home to some of Hawaii's most endangered species.

The Army has not demonstrated the capacity or will to properly serve as steward's of the land, and the EIS fails to meaningfully address the concerns.

For example, the Army's actions resulted in the burning of nearly 2,000 acres, including critically habitat for our native flora and fauna. This is completely unacceptable.

Additionally, the on going use of live-fire and bombing raises serious concerns about the environmental contamination, safety, and long degradation of the impacted areas of both the land and water.

Military activities of this nature is simply not compatible with conservation, cultural activities, and Aloha Aina. Enough is enough.

The FEIS is insufficient and should be rejected on several grounds.

Inadequate environmental and cultural impact analysis.

Lack of sufficient plans to mitigate impacts to cultural and natural resources.

Concerns about completed uranium have gone addressed.

Military usage is incompatible with the conservation district designation.

The approval of the EIS ultimately conflicts with the BLNR's constitutional duty to Malama Aina.

I urge the members of the land board to respect the land, the culture, the people of Hawai'i, by rejecting the Army's FEIS request for Pōhakuloa. It's time to return the land and begin the process of healing and restoration.

Sincerely yours,

Kimberly K. Oshiro

[Sent from AOL on Android](#)

Aloha e Members of the Board of Land and Natural Resources,

My name is Amy Owan, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka ʻŌiwi. For over 60 years, the military has desecrated this ʻāina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land.

Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the ʻāina.

Reject the Final EIS.

Mahalo for your time and consideration,

Amy Owan

Kapolei, Hawai'i, O'ahu

Sent from my iPhone

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4. Failure to Uphold the Public Trust Doctrine

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Me ka 'oia'i'o,

Cheyenne Pearce

Sent from my iPhone

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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Me ka 'oia'i'o,

Brittany Penaroza

Ewa Beach, O'ahu

Surfer, Native Hawaiian born and raised on O'ahu.

Aloha kākou,

My name is Ethan Porter of He'eia, O'ahu and I am writing to urge the Board to reject the Environmental Impact Statement provided by the United States Military for the Pōhakuloa Training Area on Hawai'i Island.

Many oppose the amounts of paperwork and filings needed to develop land in our islands. The bureaucracy has caused a chokehold of paperwork and fees and can delay essential projects for our islands. Some may question why we have these processes, but they would not be in place without merit.

The burden of the Environmental Impact Statement process is for the applicant to prove that their actions on a piece of land will be minimal or mitigated to prevent damage to our 'āina. In my family, we value the 'ōlelo no'eau: "He ali'i ka 'āina, he kauwa ke kanaka," and we do our utmost to live by that. The EIS process is in place to guarantee that everyone in our islands should do the same.

As a teacher of Hawaiian History, I cannot think of any ali'i that would tolerate the kind of treatment that the United States Military continues to display towards our 'āina. They have continually overreached and overwhelmed the lands they have been loaned. Pu'uloa is a superfund site, Kaho'olawe is debilitated, Mākua is continually on fire, and Kapūkakī leaks poison into our aquifer. It will take many years before we unearth all of the environmental damages left on the myriad military sites that take up nearly a quarter of our land. It must stop now.

It is my belief that the United States Military is unable to prove with efficient evidence that any new lease agreement will prove minimal adverse effects to our environment. The only EIS report that this Board should accept is a clean up plan.

Please deny this EIS.

Ke aloha nō,
Ethan Porter

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhaku'loa begin.

Me ka 'oia'i'o,

William Price

Pahoa, Hawaii

Kanaka Maoli

Willprice1986@gmail.com

Sent from my iPhone

Aloha mai, I respectfully submit this testimony to request that you reject the FEIS for the continued military use of Pōhakuloa. This document fails to meet the environmental, legal, or ethical standards expected in our state.

For decades, the U.S. military's use of Pōhakuloa Training Area (PTA) on Hawai'i Island has exemplified a blatant disregard for Hawai'i state law, environmental protections, and the cultural and spiritual rights of Kānaka Maoli (Native Hawaiians). The land—culturally sacred and ecologically vital—has been misused, desecrated, and militarized under the guise of national defense, with little to no meaningful accountability or transparency. The 133,000-acre area, once used for traditional food gathering, spiritual ceremonies, and cultural practices, has been transformed into a live-fire training zone. This violates Hawai'i's Public Trust Doctrine, which mandates that state lands—especially ceded lands like Pōhakuloa—be managed for the benefit of present and future generations, with special regard for Native Hawaiian rights and access. Yet, instead of upholding these responsibilities, state and federal authorities have allowed toxic contamination, unexploded ordnance, and ecosystem degradation to continue unchecked. Numerous legal cases and public testimonies have highlighted the military's failure to conduct adequate environmental assessments, cultural impact studies, or to engage meaningfully with Native Hawaiian communities. Live-fire exercises have destroyed native flora and fauna, disturbed burial grounds, and rendered once-sacred spaces inaccessible or dangerous. The land that once nourished both body and spirit is now poisoned—literally and figuratively.

This is not just a case of environmental neglect—it is cultural erasure. By denying access to land essential for 'ohana-based subsistence practices like hunting and gathering, and by desecrating spaces central to Native Hawaiian spirituality, the military presence at Pōhakuloa has perpetuated a cycle of harm, trauma, and dispossession. It is an ongoing occupation—both of land and of identity.

We will not let this continue.

As Kānaka Maoli and stewards of these lands, we demand demilitarization. We demand the return of our 'āina. We demand that Hawai'i's laws protecting Indigenous rights, environmental integrity, and sacred traditions be enforced, not ignored. We call for the end of lease renewals, the restoration of damaged lands, and the prioritization of cultural and ecological healing.

Pōhakuloa is not just a training ground. It is a wahi pana, a living, breathing embodiment of our history, our connection to 'āina, and our future. The time for accountability is now.

Mahalo.

Na'u,

Lovia Starry Publico

KALO KRU LLC

808-430-7698

www.kalokru.com

Copy / Paste + Add your mana'o 🙏

Email to: blnr.testimony@hawaii.gov

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this 'āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Justin Riddleberger

Waialua, Oahu

Sent from my iPhone

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

My name is Jodi Robinson and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1.

The public trust doctrine, embodied in our state constitution, requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources, and in protecting the interests of the present and future beneficiaries of the trust. Without cultural surveys, biological opinions, or a good faith assessment of alternative beneficial uses of the long-abused 'āina at Pōhakuloa - all things missing from the FEIS - the BLNR simply lacks the information it needs to even begin upholding these public trust duties. I urge the BLNR to reject this sorely deficient FEIS, as an affront to its responsibilities under our constitution and the public trust.

Accordingly, please REJECT the FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,
Jodi Robinson

Nuʻuanu, Oʻahu, Hawaiʻi

Written Testimony to the Board of Land and Natural Resources (BLNR)

Aloha Chair and Members of the Board:

I am submitting testimony in strong opposition to the renewal of any lease—current or future—that would allow the U.S. military continued use of land, water, or airspace in or near our island home, particularly at Pōhakuloa. Even as a settler-ally for 30+ years, I have witnessed decades of abuse to our island home and the Kānaka Maoli lands, waters, and airspaces. Under the current federal administration, the threat of further militarization poses a serious and immediate danger to Hawai‘i and the broader Pacific region. The first 100 days of this administration have already revealed a troubling “shock and awe” approach—prioritizing aggression over stewardship, and expansion over accountability.

If access to our lands, waters, and skies is granted without question or oversight, we can expect these harmful policies to have even greater, more devastating impacts on our environment, our communities, and our way of life. Now is the time to stand firm in protecting our ‘āina from further destruction.

It is deeply concerning that our communities must continually expend time and energy to defend the basic principle that bombing and militarized use of land is harmful—not only to the environment but to the health, safety, and cultural well-being of Hawai‘i’s people. This reality reflects a broader pattern of environmental injustice and colonial disregard for our home and Kānaka Maoli ‘āina. **STOP THE MADNESS.** Now is time for honest, transparent, pono leadership! Radical honesty and action to protect and preserve our island home, Pacific Island network, and larger planet is **REQUIRED**. It is not somewhere in the future but **NOW**.

For decades, the military has caused irreparable damage to native ecosystems, endangered species, clean water sources, sacred sites, and public trust lands. The historical and ongoing destruction of Pōhakuloa is well documented, and it is unacceptable to allow this harm to continue under renewed leases. There is no place needed to conduct “testing” and “training” as this is a guise.

As stewards of our public lands, I urge the BLNR to reject any proposal to extend or renew military leases on state land now and in the future. The protection and restoration of Hawai‘i’s unique and fragile environment must be the priority. Our lives literally are dependent on your actions now and moving forward in a strategical and mindful focus on Hawaiian values for the maximum benefit of all, including the Earth.

Mahalo for your time. Aloha ‘āina a me ola i ka wai!

Mahalo piha,

Bonnie Ross

Instructor, English Department Kapi'olani Community College and School of Cinematic
Arts UH Mānoa

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **Pōhakuloa Training Area**, and to **urge the land board to reject the Army's EIS**.

Pōhakuloa is not just a piece of land—it is a **wahi pana**, a sacred and storied place, home to irreplaceable **Native Hawaiian cultural sites** and some of Hawai'i's most **endangered species**. The Army has not demonstrated the capacity or will to serve as a proper steward of this land, and the FEIS fails to meaningfully address these concerns.

For example, the Army's actions have already resulted in the **burning of nearly 20,000 acres**, including designated **critical habitat** for native flora and fauna. This is unacceptable. Additionally, the ongoing use of live-fire and bombing in the impact area raises serious concerns about **environmental contamination, safety, and long-term degradation** of both the land and water.

Military training activities of this scale are simply not compatible with conservation, cultural integrity, or **aloha 'āina**. Enough is enough.

The FEIS is insufficient and should be rejected on several grounds:

- *Inadequate Environmental and Cultural Impact Analysis*
- *Lack of a sufficient plan to mitigate impacts to cultural and natural resources*
- *Concerns about depleted uranium on the site have gone unaddressed*
- *Military usage is incompatible with the conservation district designation*
- *The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina*

I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by **rejecting the Army's FEIS** for Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration.

Sincerely,

Moriah Salado

Kihei Hi 96753

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this 'āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR's kuleana to mālama 'āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o,

Saxon Sawai

Waipahu, Oahu

Ph:8082271739

Apologies, previous testimony was missing my Civic Club name under my signature, resubmitting to correct that (only difference). Please disregard first submittal.

Aloha Chair Chang and members of the Board,

We are testifying to **OPPOSE - Acceptance** of the Final EIS for the Army Training Land Retention at Pohakuloa Training Area.

This EIS is incomplete as key components were omitted or not included, as well as specific alternatives were not fully analyzed, but is needed for BLNR to have an accurate understanding of the impacts of this lease renewal application, and to make an informed decision.

First, Alternative 7 and Alternative 8 need to be fully analyzed as they are possibilities, even though they do not meet the needs of the applicant. Both Alternatives may benefit and be in alignment with DLNR's mission to "Enhance, protect, conserve and manage Hawaii's unique and limited natural, cultural and historic resources held in public trust for current and future generations of the people of Hawaii nei, and its visitors, in partnership with others from the public and private sectors" and thus should be fully analyzed and presented so that BLNR can make an informed decision regarding the environmental, natural, cultural, water, and historic resources of the property being considered. The stated purpose of this EIS is to provide BLNR the information needed to have a full, accurate, and complete understanding of the impacts of this application, in order make an informed decision, and without full analysis of Alternative 7 and Alternative 8, the EIS is incomplete.

Also missing from this EIS is the cost analysis of restoration of the site back to its original condition. The cost of cleanup and restoration back to the area's original condition is required to understand the current costs to clean up and restore the land, and is also need to understand the impacts of renewing the lease. As mentioned throughout the EIS, there are impacts to biology, water, air, historical and cultural sites, and geography and soils, which an understanding of current costs is needed to inform a decision to renew the lease. If the cost of cleanup and restoration is not included in this EIS, then BLNR is also not able to consider the financial impact of the proposed action, nor the alternatives provided. This limits BLNR's ability to fully understand the impact of this lease renewal application.

Another aspect that is overlooked in this EIS is the impact that "cultural access" has on the Native Hawaiian population. Cultural access in this EIS restricts access to having limitations on when someone may enter the area, where they may go, and having an escort required. There is an

impact of these restrictions and requirements that is not analyzed nor described in this EIS. In a time where mental health is of the utmost importance, limiting a Native Hawaiian's ability to practice their culture fully within the proposed lease area, must be analyzed and included within this EIS. Without this, BLNR is not provided a fully understanding of the cultural impact the lease renewal is requesting, and BLNR is not able to make a fully informed decision.

It is for these reasons that we ask the BLNR to **reject this EIS**, as it is incomplete and missing key analysis to make an informed decision on the lease renewal.

We would also like to add that, while supporters of this lease renewal and acceptance of this EIS may state that renewing the lease is of great benefit to the US Military and is needed, the benefit to the applicant is irrelevant to BLNR's mission, and thus should not hold any value in the decision to renew the lease nor accept the EIS. The decisions to accept the EIS and to renew the lease should be based on the completeness of the EIS and the benefit to BLNR's mission, which the proposed actions of the applicant, as well as the history of the applicant's current use of the land, does not.

Mahalo for your consideration,
Keoni Shizuma

Hulu Mamo Hawaiian Civic Club

To whom it may concern,

My name is Ian Sobolewski. I live in Ohio, USA. I'm a student of a hālau hula, so the importance of the protection of Hawaiian lands is instilled in me all the way out here.

The bombing of any Hawaiian land is an indescribable tragedy.

It is not only shameful from the culturally informed perspective, but from the environmental perspective as well. I have a BA degree in archaeology with a focus on land management. Island ecosystems are incredibly diverse and fragile. Outsider disturbances can cause mass extinctions. There is a reason why Hawaii is the extinction capital of the world. This is not inevitable or unavoidable. Bombings like have occurred at Pōkahuloa are direct causes for habitat destruction, water contamination, and other unimaginable harm to the land health.

Pōhakuloa is a land where many were laid to rest. It is a land of religious and cultural importance of which I hear of in songs and hula. It was a land of ecological refuge and can be so again.

Pōhakuloa needs time to recover and become restored. This land does not need violence and destruction.

To allow the bombing to continue would be immeasurably shameful.

I urge you to listen to everyone pleading to reject the army's final environmental impact statement.

Thank you for reading my statement.

Aloha kakou,

My name is Hokukuanalia Sunia. While I hold no personal title or claim to the lands in question, I am a child of this aina. As a student, a native Hawaiian, and someone who carries the kuleana to care for this place we all call home, I submit this testimony in STRONG OPPOSITION to the Final Environmental Impact Statement (FEIS) for the proposed renewal of military leases on Hawaiian lands. I also call for an immediate and permanent end to any further negotiations regarding these leases, which are set to expire in 2029.

The history of harm to these lands is undeniable. In 1964, over 29,000 acres of public lands, many so-called “ceded lands,” were leased to the U.S. military for just \$1 per year. This opened the door to destructive live-fire exercises, the desecration of sacred places, and contamination from unexploded ordnance and depleted uranium. For nearly seven decades, places like Makua Valley, Pohakuloa, Kahuku, Kawailoa, Puuloa (Pearl Harbor), and Kapukaki (Red Hill) have borne the weight of this destruction, all in the name of “national defense.” Yet, as the late Hawaiian leader George Helm once asked, “What is national defense when what is being destroyed is the very thing the military is entrusted to defend?”

This is not a matter of better terms or more compensation. No dollar amount can justify the ongoing desecration of aina. These lands are not empty training grounds; they are sacred, storied, and irreplaceable. The damage already inflicted is deep and, in many places, irreversible. To renew these leases would be to declare that military might is valued above cultural survival, environmental justice, and the rights of the Native people of this place.

The FEIS fails to confront the cumulative harm, historical trauma, and cultural impact that military occupation has caused. Decades of broken promises, poor stewardship, and lack of accountability have eroded public trust. Healing cannot begin with more bombs and continued destruction.

As a child of this land, I cannot stand by while future generations inherit poisoned soil, contaminated water, and sacred places reduced to targets. It is our kuleana to act with courage and clarity. Like Kaho‘olawe before it, these lands must be restored to the people and the earth. Enough is enough.

I urge the Board of Land and Natural Resources and Governor Green to honor their duty to future generations. Reject the FEIS in its entirety. End the negotiations. Restore the aina. Return what was never freely given.

E mau ke ea o ka aina i ka pono.

With aloha,

Hokukuanalia Sunia

hokukuanalia.sunia@halaukumana.org

--

Hokukuanalia Sunia

Halau Ku Mana Public Charter School

Grade 11

Papa Lo'i

My name is Davie-ann Momilani Thomas.

For the Army's Final EIS. Please hear my words.

Here are my words

For friday...

He Hawai'i au. I am Hawaiian.

I also still live among The US military of many years. I am their victim to Their environmental toxins.

BLNR as you vote on Friday - listen in silence ... pōhakuloa calls you to VOTE to REJECT the final Environmental Impact Statement from the Army

Mahalo

Sincerely,

Davie-ann Momilani Thomas

[Sent from Yahoo Mail on Android](#)

Aloha Members of the Board of Land and Natural Resources,

My name is Steven Thomas, and I am writing in **TOTAL** opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

There is no disputing the power of the U.S. military or the State of Hawai'i. What has been ignored over the past 133 years is that that power has also been masquerading around as rightful authority and jurisdiction, which, contrary to appearances it does not have.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Steven Thomas

Mililani, Hawai'i (Oahu resident)

Email to: blnr.testimony@hawaii.gov

Subject: Testimony in Opposition to U.S. Army's Final EIS for Pohakuloa Training Area

Aloha Chair and Members of the Board of Land and Natural Resources:

I am writing to urge the Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (FEIS) regarding the retention of approximately 22,750 acres of state-owned conservation land at Pohakuloa Training Area (PTA) when the current lease expires in August 2029.

The Army's FEIS fails to adequately address significant environmental and cultural concerns that must be prioritized over military interests. As stewards of state lands held in public trust, the BLNR has a responsibility to protect these lands for future generations, not continue a harmful arrangement that began in 1964 when the Army obtained the parcel for a mere \$1.

Environmental Concerns

Pohakuloa is classified as a sub-alpine tropical dryland forest—one of the world's rarest ecosystems. This irreplaceable land provides critical habitat for the endangered nēnē (Hawaiian goose), the 'ōpe'ape'a (Hawaiian hoary bat), and numerous other endemic species found nowhere else on Earth. The FEIS acknowledges but fails to sufficiently mitigate potential harm to native species, water resources, and soil through live fire exercises and toxic contamination.

The Army's own documentation reveals a troubling history of environmental degradation: between 2012 and August 2024 alone, 96 fires were recorded on the parcel, burning approximately 19,328 acres. The FEIS itself predicts increasing wildfire risk due to climate change, yet proposes to continue activities that have repeatedly caused such fires.

Cultural Impacts and Legal Obligations

The Hawai'i Supreme Court ruled in 2019 that state officials failed to ensure the military upheld its duties to clean up Pohakuloa, finding that this failure harmed Hawaiian cultural interests. The Court explicitly stated that "as trustee, the State must take an active role in preserving trust property and may not passively allow it to fall into ruin." Approving the FEIS would directly contradict this legal ruling.

The FEIS acknowledges that continued military use would have "significant adverse impacts" on cultural practices and environmental justice but fails to propose adequate solutions. The Office of Conservation and Coastal Lands has stated clearly that the proposed use is inconsistent with Conservation District designations and state land use policy, concluding that the "no action alternative would provide the best benefits to the land, cultural resources and traditional Hawaiian practices."

Reasonable Alternatives

The Army has alternative training facilities available, while Hawai'i has only one Pohakuloa. Conservation and cultural restoration represent a more appropriate future for these lands. The FEIS fails to adequately consider full cleanup and restoration alternatives that would honor both the land's conservation status and its cultural significance.

The days of the military leasing culturally significant conservation lands for nominal amounts are over. The BLNR should reject this FEIS and require the Army to fulfill its existing lease obligations to clean up and restore the land to its original condition before the lease expires in 2029.

Conclusion

I respectfully ask the BLNR to:

1. Reject the Army's FEIS as inadequate and inconsistent with the land's conservation designation
2. Require complete removal of unexploded ordnance and environmental remediation of the leased lands
3. Fulfill the state's obligations as trustee by prioritizing environmental protection and cultural interests over military use
4. Pursue the "no action" alternative, which would best serve the land's long-term protection

The decisions you make today will determine whether future generations inherit protected, restored lands or lands further degraded by military use. I urge you to reject the FEIS and choose the path of environmental and cultural stewardship.

Me ka ha'aha'a,

Lorasia Ieru-Toilolo

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

My name is Deborah Umiamaka, and I am writing to respectfully urge you to reject the Final Environmental Impact Statement (FEIS) in Agenda Item D-1.

The public trust doctrine, as stated in our state constitution, requires the BLNR to act with due diligence and prudence in managing Hawai'i's natural and cultural resources for the benefit of present and future generations. The FEIS for Pohakuloa is clearly insufficient: it lacks essential cultural surveys, biological opinions, and a good faith assessment of alternative beneficial uses for this long-abused 'āina. Without this critical information, the BLNR cannot fulfill its constitutional and public trust responsibilities.

Rejecting this deficient FEIS is the only way to uphold your duty to protect our resources and our communities. I urge you to do the right thing and reject the FEIS presented in Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,
Deborah Umiamaka

This is my written Testimony to BLNR to REJECT (not accept) the final EIS on Pohakuloa.

REJECT THE FINAL EIS on Pohakuloa

Mahalo,

Tamara Umiamaka

85175 Farrington Hwy

Waianae Hawaii 96792

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR’s kuleana to mālama ‘āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'ōia'i'o,

Kyra Viveiros

Kailua, Oahu

Kanaka Maoli / Lomi Practitioner

May 7, 2025

Aloha BLNR Members

It seems that nothing is being done at Pohakuloa about cleaning up the mess that is plaguing the our Aina for the last 70 so years. Are you forgetting there are people living here, families with children pets and livestock who depend on you to keep a safe and healthy environment for they're well being. We the people definitely reject the final EIS from the military because as of now they have not done any major cleanup that they should have been doing years ago. Do not forget that each and every one of you belong to this mokupuni and took the oath to protect and preserve the quality of life we all deserve. This includes you and your families as well, don't let them poison all of us. KŪ (stand up) for what is PONO (right) (We The People) is what it's supposed to be, not who has the most money. So think about you families, and your children, and your nā mo'opuna, and think of them when you vote on this issue

Mahālo , and Malama

Danny Wassman

Aloha e Chair Chang and Members of the Board of Land and Natural Resources,

My name is Joe Wat and I respectfully urge you to do the right thing and reject the clearly insufficient FEIS in Item D-1.

This FEIS disregards clear Hawai'i law, as even DLNR staff repeatedly point out in the staff submittal. The Army is not above the law, and yet they refuse to address basic legal requirements, such as analyzing the environmental and cultural impacts that will take place on federal lands, and completing basic surveys so that a true objective assessment can be made about the impacts of proposed Army "retention" of 'āina in Pōhakuloa.

Please uphold the law, and your mission, and reject this incomplete and unlawful document.

"Formerly used military lands" are scattered throughout our pae 'āina, from Kaho'olawe to the back of Kahalu'u where I live and work. The total lack of military accountability for cleaning these lands is a disservice to all future generations of community in Hawai'i. How big can our hopes and dreams be when we're limited to walking trails between posts where land has been cleared to 4 feet?

Without an environmental and cultural impact statement that addresses and acknowledges the weight of this cost to lāhui, I urge you to please REJECT the FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,

Joe Wat

Aloha Land Board Members,

I write to voice my firm opposition to the U.S. Army's proposed lease retention at Pōhakuloa Training Area and to urge the Board to reject its Final Environmental Impact Statement (FEIS). Pōhakuloa is not merely land—it is a wahi pana, a sacred place entwined with Native Hawaiian history, culture, and some of our most critically endangered species. The Army has repeatedly failed to prove itself a responsible steward, and the FEIS neglects to address these failures adequately.

The Army's Record Speaks for Itself

- **Environmental Destruction:** Nearly 20,000 acres—including designated critical habitat—have been burned due to Army activities, devastating native ecosystems.
- **Cultural Disregard:** Live-fire exercises and bombing persist in the impact area, risking irreversible harm to cultural sites and contaminating land and water.
- **Unanswered Risks:** Concerns about depleted uranium and long-term environmental degradation remain unresolved.

Why the FEIS Must Be Rejected

1. **Inadequate Analysis:** The FEIS lacks rigorous assessment of environmental and cultural impacts.
2. **No Meaningful Mitigation:** There is no credible plan to protect natural or cultural resources.
3. **Legal Conflict:** Military use violates the conservation district's purpose and the BLNR's constitutional duty to mālama 'āina.

Enough is enough. Pōhakuloa deserves healing, not further exploitation. I implore the Board to stand for the land, our culture, and future generations by rejecting this FEIS. The return of these lands must mark the beginning of true restoration.

Mahalo for your time and stewardship,
Kardeen H. Wong

The small arms and artillery live fire training at Pohakuloa is damaging the environment. Additionally the training events are a noise pollution problem for "nearby" residents as far away as Waimea town. Not to mention the historical live fire burden, that has left traces of depleted uranium and other toxic pollutants within the land... and hopefully not the water table. What is the State of Hawaii gaining by allowing the US military and specifically the US Army to train at Pohakuloa? The DOD budget can afford a lease on State lands, with noise and environmental agreements attached. If this land is so valuable for training, then why can't the US Army work with the local government and community to make sure they aren't a danger or nuisance for residents?

I would like to see the US Army's use of the land at Pohakuloa terminated, but at a minimum, I think the US Army should truly evaluate what their actions are doing to the Island of Hawaii and to the people who make this island their home. The State has the authority to make the US Army toe a well defined line. You folks have the authority to require them to make sure their EIS submission meets the standards of 2025 and not those of 65 years ago.

Please reject the US Army's Final EIS submission. Thank you. -C. Young

Aloha members of the Board of Land and Natural Resources,

I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration.

Sincerely,

Christine Otto Zaa

Kaimukī

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Subject: Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned resident of the Earth and steward of this ‘āina to urge your firm rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land. It is sacred—a wahi pana rooted in ancestral knowledge, ceremony, and responsibility. For over 70 years, this sacred landscape has endured relentless degradation under U.S. military occupation. The submission of this EIS represents not responsible stewardship, but a continuation of the desecration and dispossession of our homeland.

I offer this testimony on behalf of our lāhui to raise four urgent and interconnected concerns:

1. Continued Desecration of Sacred Sites

Pōhakuloa is rich in cultural and spiritual significance, housing ancient trails, heiau, and iwi kūpuna. Military activity has repeatedly bombed and bulldozed these sacred spaces, despite legal and ethical protections. This is a violation not only of Native Hawaiian religious and cultural rights but of the DLNR’s kuleana to mālama ‘āina.

2. Environmental Irreversibility

The EIS gravely underestimates the environmental damage caused by decades of military activity. The use of live ammunition, chemical contaminants, and heavy artillery has poisoned soil, threatened endangered species, and disrupted fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost—let alone justifies further occupation.

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

As trustees of the land under Article XI, Section 1 of the Hawai'i State Constitution, DLNR is legally bound to conserve and protect Hawai'i's natural and cultural resources for present and future generations. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation.

In the face of pressure from federal agencies, I implore this committee to stand on the side of justice, pono, and true aloha 'āina. The legacy you leave will be remembered not by your deference to power, but by your courage to protect the most sacred and irreplaceable parts of our homeland.

The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin.

Me ka 'oia'i'o

Sandra ZAFFARANO

Fort Bragg, CA

Former resident of Puako, HI

Sent from Gmail Mobile

Testimony in Strong Opposition to Agenda Item D1 - Final Environmental Impact Statement for the Army Training Land Retention at Pohakuloa Training Area

Aloha nui e na lala o ke Komike 'Aina (BLNR),

'O wau no 'o Kawai Vierra, he wahine kanaka 'oiwi, he mama, he mo'opuna, a he kia'i 'aina. I come before you with a heavy but determined heart to oppose the acceptance of the U.S. Army's Final Environmental Impact Statement (EIS) for continued occupation and desecration of Pohakuloa.

Pohakuloa is not just land. It is wahi pana - storied and sacred. It is a living ancestor. It holds the bones, the memories, and the life-force of our people and of countless endangered species. No military report, no environmental impact statement, no lease can ever justify bombing such a sacred space. The 'aina cannot speak for itself in your meeting rooms - so I speak as one descendant of this land, and I ask you to fulfill your constitutional and ancestral duty to malama 'aina.

This EIS is grossly inadequate. It fails to account for the deep, irreversible damage already inflicted by 65 years of bombing, contamination, and neglect. Nearly 20,000 acres of habitat burned. Depleted uranium in our soil. Cultural sites bulldozed, ignored, or destroyed. This is not stewardship. This is desecration.

The Hawai'i Supreme Court already ruled in Kahaulelio v. DLNR that the State failed its duty to protect these trust lands. That ruling was not just about legal obligation. It was a reminder that the lands of Hawai'i are not up for sacrifice. The kuleana to protect Pohakuloa - to protect all conservation lands - lies with you. And kuleana is not passive. It requires courage. It requires you to say, "Enough."

There is no version of this military use that is compatible with the conservation designation. Firing live ammunition and detonating bombs on conservation land is not protection - it is destruction. This site is meant to conserve and perpetuate life, not to train for war.

I am pregnant with my next child. When I think of the kind of future I want for my keiki - and for all keiki o ka 'aina - it is not one where the most sacred places of our islands are poisoned, desecrated, and leased away for the profit and convenience of a foreign military. It is one where our state leaders, our Land Board, have the courage to ho'oponopono - to correct past wrongs and protect what is still left.

I urge you, as a mother, as a Native Hawaiian, and as someone who still believes in the values of this land - reject this EIS. Do not accept another generation of violence against Pohakuloa. Honor your highest duty to our 'aina, to our culture, and to our future.

Me ka ha'aha'a a me ke aloha 'aina,

Kawai Vierra

Kaua'i

Kanaka 'Oiwī Wahine, 'Ōhana Caregiver, and Kia'i 'Āina