

From: [Kailey Souza](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa testimony
Date: Wednesday, May 7, 2025 1:14:19 PM

Aloha mai nei kakou. ‘O Kailey Souza ko’u inoa. No O’ahu mai au. Noho wau ma ka moku ‘o Wai’anae, ma ke ahupua’a ‘o Lualualei, ma ke alanui ‘o Leihoku. ‘O Pu’u Mā’ili’ili ko’u mauna. Umikāmāhā o’u makahiki. Aia au ma ka papa ‘Ewalu.

Aloha my name is Kailey Souza. I am 14 years old, im in the 8th grade at a Hawaiian charter school called Ka Waihona o Ka Na’auao on the island of O’ahu. As a kanaka maoli I don’t want the lease renewed for the Pohakuloa or any other US base on our ‘Āina because for over 40 years now we as the Hawaiians have tried so hard to bring back the land that was once taken away from us and as a young true Hawaiian I feel so much pain that all my ancestors felt when we were being overthrown or killed or even thrown off our own land. Like why do you think it is okay to take something that is not yours and destroy our culture right in front of us. In conclusion this is why I don’t want the lease to be renewed because of all the pain that we have already been through. Mahalo for your time.

From: [Maile Risch](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony opposing the final environmental impact statement (EIS) For U.S. military use of Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 1:11:50 PM

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Hawaii Resident 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,
Maile Risch
Makawao, Hawai‘i**

Sent from my iPhone

From: [michaela.arnold](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 1:11:24 PM

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,

[michaela Arnold]
[San Pedro , Mainland]
[beachparty26@yahoo.com]

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

Aloha e Chair Chang and Esteemed Committee Members,

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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.

Me ka 'oia'i'o,

Kawaiohawaiki Anakalea-Kila

Oahu, Hawai'i

Kanaka Maoli / Cultural Practitioner

808-628-1117

From: [Pana'ewa Andrade](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 3:09:23 PM

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 'Ōiwi/Native Hawaiian 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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4. Failure to Uphold the Public Trust Doctrine

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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,

John Kauanoelopana'ewa Andrade
Kalaoa, Hawai'i
Kanaka 'Ōiwi/Native Hawaiian
panaewa.andrade@gmail.com

From: [Corey Asano](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony - PLS REJECT ARMY's EIS
Date: Wednesday, May 7, 2025 3:40:21 PM

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

RE: Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area

Submitted by: Corey Asano

Date: 5/7/2025

Aloha Chairperson and Members of the Board,

My name is Corey Asano, and I am a member of Hui Aloha Aina o Honolulu. I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposed retention of approximately 22,750 acres of public, seized, and sacred land at Pōhakuloa Training Area (PTA). I urge the BLNR to **reject this EIS in full**.

This EIS is deeply flawed. It is incomplete, evasive, and in clear violation of HRS Chapter 343. The document fails to disclose critical information, evades legal responsibilities under the public trust doctrine, and offers no meaningful mitigation for the widespread harm the Army has already caused.

The most egregious failures include:

- **Toxic Contamination with No Cleanup Plan**

The FEIS acknowledges heavy metals and hazardous waste (lead, diesel, ammunition remnants) at PTA but does not offer a credible plan to monitor or clean them. The Army's claim that minimal rainfall reduces risk ignores the presence of shallow aquifers and the possibility of long-term groundwater contamination.

- **Fire Risk Minimization**

Over 2,000 wildfires have occurred at PTA since training began in 1943 — more than 1,000 of them directly caused by Army activity. Despite this staggering number, the FEIS offers little in terms of wildfire prevention or response planning, a glaring omission especially during Wildfire Awareness Month.

- **Outdated and Insufficient Air Quality Data**

The most recent air quality monitoring cited in the FEIS dates back to 2007. No current data is provided to assess the impact of decades of training and combustion activities on surrounding communities and ecosystems.

- **Lack of Comprehensive Cultural Survey and Consultation**

The Army has failed to survey vast areas of the land — including sections confirmed to contain Native Hawaiian cultural and historic sites. The FEIS also notes the presence of iwi kūpuna but fails to ensure full consultation with Island Burial Councils as required under state law.

- **No Incidental Take Permit for State Lands**

While the Army operates under an incidental take permit for RIMPAC in marine

environments, there is no such permit disclosed for PTA. This means there is no accountability for the ongoing harm to endangered birds, plants, and other protected species — several of which are known to inhabit the leased lands.

- **Neglect of Cumulative and Long-Term Impacts**

The FEIS narrowly focuses on the 23,000 acres of state land without meaningfully considering the interconnectedness of the 110,000+ adjacent federally held acres. The Army's continued refusal to acknowledge this cumulative impact renders their environmental analysis incomplete and misleading.

- **Violation of Public Trust and Fiduciary Duty**

These lands are "ceded" lands — held in trust for the benefit of Native Hawaiians and the public. The state has a legal and moral responsibility to ensure these lands are not desecrated or mismanaged. The FEIS fails to account for the significance of this trust relationship and instead treats the land as a disposable training ground.

- **Military Activity is Incompatible with Conservation Lands**

Large portions of the state-leased lands at PTA fall within the Conservation District, where military training activities — including live-fire, munitions testing, and heavy vehicle use — are **not allowed** under Hawai'i law. The BLNR's own Office of Conservation and Coastal Lands has previously stated that such uses are inconsistent with the purposes of the Conservation District. The FEIS does not resolve this contradiction and makes no effort to align the proposed land use with state zoning and land use regulations.

REJECT THIS EIS. PROTECT 'ĀINA. HONOR YOUR DUTY.

This Board is not bound to accept an EIS that fails to inform, fails to mitigate, and fails to protect. The Army has had decades to prove it can care for this land—and has only shown harm. You have the right—and the responsibility—to say enough.

Reject this EIS. Refuse to rubber-stamp desecration. Stand for Pōhakuloa, for Hawai'i, and for future generations.

Mahalo for your time and consideration.

Me ka 'ōia'i'o,

Corey Asano
Kaneohe, Oahu

From: [Julie Au](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject FEIS for PTA
Date: Wednesday, May 7, 2025 2:37:10 PM

Aloha kākou,

I am writing as a Native Hawaiian mother and activist to urge you to reject the US Military's FEIS for PTA.

You have ample standing and an outright kuleana to reject the Army's FEIS. No one should have to convince those who work to protect Hawai'i's land and natural resources that BOMBING the land is bad for the environment. You know that it is. I cannot fathom anything worse for the land and our precious resources. You cannot in good conscious allow this desecration and colonial violence to continue. If you stand for Hawai'i and our people, you must reject the FEIS.

Pōhakuloa is a wahi pana but more than that it is Hawaiian land. It is not the Army's land and they have been the worst possible tenants. They have spent the last 70 years bombing that land. They have not cleaned up ordinances for decades. They have irreparably damaged the land and the resources there. They have downplayed their impact to the environment and our culture for decades. They have and will continue to ignore community voices and concerns, but you must not ignore us. We will not stand and let this violence continue.

Reject the Army's FEIS for PTA. Enough is enough.

Me ke aloha 'āina,
Julie Au

'Āina Momona
Director of Education, Research, Outreach
Make 'āina momona again!

From: [Kay Bee](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 3:09:53 PM

ATTN: 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).

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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

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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.

Me ka 'ōia'i'o,
Kuuipo Buchin
Kea'au, HI
321-424-7748



May 9, 2025

Chairperson Dawn Chang & Members of the Board
Board of Land & Natural Resources, State of Hawaii
1151 Punchbowl St. #132
Honolulu HI 96813

RE: BLNR Meeting 5/9/2025 Support for Pohakuloa Training Area

Thank you for volunteering to serve our state in the capacity you do. I know it involves many hours of reading, research and careful consideration on a broad range of subjects.

I speak in strong support for the Boards review and acceptance of the Final Environmental Impact Statement (FEIS). My understanding of the respect and expertise of the Army to identify solutions to address concerns that will further preserve lands of cultural, environmental and agricultural values within the scope of PTA lands including the leased lands has been done with sincere respect and professionalism.

The Army has the same goal that I as a resident of Hawaii Island have, to live in harmony with our neighbors. Without the Armies' presence our Hawaii Island community would lose out on far too many services and features necessary to be a well-rounded, safe community. The training facilities for our firefighters, police, and law enforcement is just one important aspect. The first responder skills and abilities the army provides along several miles of a major access road enables commerce to move comfortably for local workers/residents and visitors alike.

In the interest of time, I will stop listing information I know the FEIS provides you and close by asking that you please accept the FEIS and allow this process to move to the next step forward for success.

With Aloha,

Mary Begier, Realtor®

Referral & Relocation Certified / 1998 Aloha Aina Realtors Choice Award
Certified Residential Specialist / Certified Residential Broker
2001 Realtor® of the Year Hawaii Assoc. of Realtors®
2001 Realtor® of the Year Hawaii Island Board of Realtors®
2002 Realtor® of the Year Honolulu Board of Realtors®
2003 President Honolulu Board of Realtors®
2006-2013 Hawaii Island Commissioner Hawaii State Foundation on Culture & the Arts
2007 President Hawaii Island Board of Realtors®
2008-09 President Rotary Club of Hilo Bay
2009-2010 President Hawaii Island Chamber of Commerce
2010-2011 Chair Hawaii State Foundation on Culture & the Art
2013 Community Hero Award from Hawaii Invasive Species Council
2015 Hawaii Island Chamber Athena Award Recipient
2016-24 OEQC/EAC Advisory Member Hawaii Island
2022-25 HICC Chair of Military Affairs Committee
2022-25 NAR BOD Medium Board Representative

Robin Campaniano
3525 Lelehune Place
Honolulu, Hawai'i 96822
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) AND the Air Force Civilian Advisory Council, 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,

Robin Campaniano
Member, Chamber of Commerce Military Affairs Council
Member, Air Force Civilian Advisory Board

From: [Chelzin Dane Caspino](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 2:11:22 PM

Aloha, I am Dane Caspino, a 13-year-old student on O'ahu. I don't want the lease renewed for Pohakuloa or any other U.S base on our aina because of the destruction and killing of our aina, and I do not wish to see this happen to our land for any longer. This suffering has gone on for 60+ years for our Motherland, getting bombed, broken, and poisoned. One example of this is the Red Hill incident. On May 6, 2021, a fuel movement at the Red Hill Fuel Storage Facility caused a pipeline joint failure that released over 19,000 gallons of JP-5 jet fuel onto the tunnel floor. Which also means the water people drink and use for other purposes. Over 9000 families got sick from contaminated water. In closing, I don't want the lease renewed for Pohakuloa or any other U.S base on our aina.

From: [Elena Chang](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 2:50:40 PM

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

My name is Elena Chang, and I respectfully urge you to **REJECT** the clearly insufficient FEIS in Item D-1.

As the DLNR staff submittal 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 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.

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 does not have the information it needs to even begin upholding these public trust duties.

Please do the right thing and **REJECT** the FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,
Elena Chang

From: [anthonyw808](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 3:32:52 PM

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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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.

Anthony Wrightsman Chen
Honolulu, HI

From: [Micaleh Crane-Worley](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Section D-1
Date: Wednesday, May 7, 2025 3:23:57 PM

Aloha,

I am a Hawaii state resident opposing the Acceptance of the FEIS for the Army Training Land Retention Program at Pōhakuloa Training Area. The Army's use of this land has poisoned the soil. They do not clean up their ordinances nor bullet casings. They have done irreparable damage to the land and disrupted a precious ecosystem. Their use of this land should not be extended ever.

Thank you,
Micaleh Crane-Worley
949-409-5253

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Aloha 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,

Jamaris DeJesus

1438 Dominis St Apt A

Honolulu, HI 96822

From: [Jolie Des Forge](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] testimony.
Date: Wednesday, May 7, 2025 2:12:07 PM

Aloha I am Jolie , a 13 year old student on oahu and I do NOT want the lease to be renewed . I have learned about what you did to the island and to our ancestors . It is very sad that you have lied to our people about protecting us and our land. You are not taking care of our land by bombing and leaving your mess there to sink into our land. I have been learning about our past and how long you have been bombing that area. The land is dying because you guys are using bad things and substances on our land makes our hearts hurt as a native hawaiian.

I do not want the lease to be renewed for the military because what you guys did and are doing now.

From: [Noah D](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] re: Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Wednesday, May 7, 2025 1:21:14 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Noah Hanohano Dolim 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,
Noah
Kunia, O'ahu & Hilo, Hawai'i

To whom it may concern,

I urge you to reject the Army's final environmental impact statement for the Army Training Land Retention at Pōhakuloa Training Area. The final EIS is insufficient, and should be rejected on several grounds.

Firstly, the Army has not provided adequate plan for mitigating the environmental and cultural impacts of their activities at Pōhakuloa. Pōhakuloa is a wahi pana containing irreplaceable Hawaiian cultural sites and is also a critical habitat for over two dozen of Hawai'i's threatened and endangered endemic species. In addition having an insufficient plan going forward, the Army has already proved to be an inadequate steward of the land, burning over 20,000 acres which included critical habitat for some of Hawai'i's most endangered native flora and fauna. Further, allowing the military to conduct live fire exercises on state owned land is in direct conflict with the Conservation Land designation of this area and should not be permitted. This also conflicts with BLNR's constitutional duty to mālama 'āina.

In addition to the insufficient mitigation of environmental and cultural impacts, continuation of live fire exercises also poses a health risk to residents. Upon impact of munitions with the soil, depleted uranium is churned up and blown across the island. Exposure to depleted uranium has been linked to cancer and other negative health impacts, and thus the Army's activities at Pōhakuloa directly endanger the population of Hawai'i Island.

For these reasons, approval of the Army's current EIS would be an ill-advised abdication of BLNR's duty to the people of Hawai'i. Please reject it.

Sincerely,
Bailey Donahue

To whom it may concern,

I urge you to reject the Army's final environmental impact statement for the Army Training Land Retention at Pōhakuloa Training Area. The final EIS is insufficient, and should be rejected on several grounds.

Firstly, the Army has not provided adequate plan for mitigating the environmental and cultural impacts of their activities at Pōhakuloa. Pōhakuloa is a wahi pana containing irreplaceable Hawaiian cultural sites and is also a critical habitat for over two dozen of Hawai'i's threatened and endangered endemic species. In addition having an insufficient plan going forward, the Army has already proved to be an inadequate steward of the land, burning over 20,000 acres which included critical habitat for some of Hawai'i's most endangered native flora and fauna. Further, allowing the military to conduct live fire exercises on state owned land is in direct conflict with the Conservation Land designation of this area and should not be permitted. This also conflicts with BLNR's constitutional duty to mālama 'āina.

In addition to the insufficient mitigation of environmental and cultural impacts, continuation of live fire exercises also poses a health risk to residents. Upon impact of munitions with the soil, depleted uranium is churned up and blown across the island. Exposure to depleted uranium has been linked to cancer and other negative health impacts, and thus the Army's activities at Pōhakuloa directly endanger the population of Hawai'i Island.

For these reasons, approval of the Army's current EIS would be an ill-advised abdication of BLNR's duty to the people of Hawai'i. Please reject it.

Sincerely,
Bailey Donahue

From: [Adric Ellis](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] pohakuloa testimony
Date: Wednesday, May 7, 2025 1:14:54 PM

aloha my name is adric and i go to a hawaiian charter school on oahu and i feel that the leas should not be renewed and think about this it's not only affecting the land this is affecting our lahui and we should really consider how much this is affecting us because just how long were we fighting for our land we fought for red hill then mauna kea and now for this leas and pohakuloa really think about it thats why we shouldn't pass the leas

From: [Adam Fiebs](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, May 7, 2025 3:10:25 PM

Hello Ms. Dawn Chang

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,
Adam Fiebelkorn
Seattle , WA USA
adam.fiebs@gmail.com

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 Supporting Acceptance of the Final EIS for Army Training Land Retention at Pōhakuloa Training Area

Dear Chairperson Chang and Members of the Board:

I write to express my full support for the U.S. Army's request to retain Pōhakuloa Training Area (PTA) lands. As a Hawai'i Island resident serving on the Military Affairs Committees for both the Hawai'i Island Chamber of Commerce and Hawai'i Business Roundtable, and as a PTA Advisory Council member since 2016, I've witnessed firsthand the Army's commitment to responsible stewardship.

Through these positions, I have observed the care, diligence, and real resources that the U.S. Army has applied to the cultural and environmental aspects of its land management and community stewardship at PTA. The Army invests over \$12M annually in biological and cultural resources management actions throughout its training land in Hawai'i. They are committed to environmental stewardship and protection, guided by federal regulations. Efforts include managing the preservation of dozens of endangered plants and animals, propagating rare native plants, stocking a seed bank, and managing over 1200 archaeological sites through monitoring, preservation, and surveying. Mitigation measures outlined in the EIS include developing a formalized access plan for Native Hawaiian organizations, individuals, and cultural practitioners, and ensuring cultural resources staff monitor construction projects to prevent impacts. The EIS analyzes potential impacts on biological resources and historic and cultural resources and practices, demonstrating the Army's focus on these sensitive areas.

PTA has also proven to be an invaluable support to Hawai'i Island's emergency services entities and infrastructure. The Army at PTA provides support to community emergency response. PTA is crucial for supporting and training the Hawai'i National Guard, local first responders, and law enforcement. The capability to respond to emergencies on Mauna Kea, Mauna Loa, and particularly along the Daniel K. Inouye Highway is vital for our island community. The PTA Fire and Rescue team acts as first responders in the Saddle Road area, handling emergencies and fighting wildfires alongside county and state personnel. Non-profit organizations like the Red Cross and youth groups also utilize PTA.

As the only Army Major Training Area in Hawai'i, PTA is irreplaceable for maintaining operational readiness across the Indo-Pacific. Its unique terrain and scope make it the only training area in Hawai'i capable of accommodating collective live-fire and maneuver training above company level. Retaining this state-owned land is essential for U.S. Army Hawaii to meet training requirements and maximize existing infrastructure investments.

The Army has conducted a comprehensive public participation process for this joint NEPA-HEPA document, holding public meetings and review periods. While acknowledging concerns, the Army is working to balance preservation of cultural lands with maintaining vital training capacity.

Supporting land retention continues a relationship benefiting our community, with Army expenditures supporting local employment and businesses. I urge the Board to accept the Final Environmental Impact Statement.

Mahalo for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Fujimoto". The signature is stylized with a large "J" and "F".

Jason Fujimoto

Hawaii Island Resident

Member, Military Affairs Committee, Hawaii Island Chamber of Commerce

Member, Military Affairs Committee, Hawaii Business Roundtable

Member, Pohakuloa Training Area Advisory Council



May 7, 2025

Chairperson Dawn Chang and Members of the Board
Board of Land and Natural Resources of the 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:

As a member of the Hawaii Business Roundtable and as the Executive Chairman of Servco Pacific Inc., 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 current and complex challenges they face across the Indo-Pacific. PTA's unique terrain, scope, and proximity to the U.S. Indo-Pacific Command headquarters make it irreplaceable for joint exercises, disaster response, and mission-critical coordination. PTA is also an essential training ground for Hawai'i's first responders, including fire, police, and emergency medical personnel.

The military is a key economic driver of Hawai'i's economy. It infuses billions of dollars into our economy, and Hawai'i ranks second among the states in military spending per capita. It provides over 56,000 net jobs and is potentially the foundation of new, diversified industries like advanced manufacturing and cybersecurity. Our relationship with the military is truly an asset.

I urge the Board to carefully review and accept the Final Environmental Impact Statement ("FEIS"). 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.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Mark H. Fukunaga", with a long horizontal flourish extending to the right.

Mark H. Fukunaga
Executive Chairman

From: [Jocelyn Grandinetti](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 3:25:37 PM

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

My name is Jocelyn Whei-Tsi Grandinetti, and I respectfully urge you to REJECT the clearly insufficient FEIS in Item D-1.

As the DLNR staff submittal 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. 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.

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

Mahalo nui for the opportunity to testify.

Sincerely,

Jocelyn Whei-Tsi Grandinetti

From: [Lisa Grandinetti](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's EIS for Pohakuloa
Date: Wednesday, May 7, 2025 1:52:07 PM

THE ARMY ADMITS WIDESPREAD CONTAMINATION-BUT REFUSES TO ASSESS OR CLEAN IT UP.

THE ARMY CANNOT PROVE THAT CONTAMINATION HASN'T SPREAD INTO WATER OR ECOSYSTEMS.

THE ARMY WON'T SHARE SAFETY PROCEDURES OR SPILL DATA- AND DELETES CRITICAL INFORMATION.

FIRES, ENDANGERED SPECIES, AND CLIMATE HARMS ARE DISMISSED WITHOUT EVIDENCE.

THE FEIS EVADES HAWAII LAW BY IGNORING OBVIOUS CUMULATIVE IMPACTS.

I urge you to reject the army's EIS for Pohakuloa.

Thank you,
Lisa Grandinetti

From: [Adeline Griffin](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, May 7, 2025 1:30:43 PM

I oppose Agenda Item D-1 because the FEIS disregards Native Hawaiian rights, community input, and environmental protections. This is not what pono stewardship looks like.

I submit this testimony out of concern for our endangered species and cultural heritage. The FEIS skips critical surveys and assessments. This is not acceptable. Please reject it.

Mahalo Berta Guzman

Sent from my iPhone

From: [Kealakai Hammond](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pohakuloa
Date: Wednesday, May 7, 2025 1:49:19 PM

Aloha,

BLNR exists to protect our public trust resources, not to rubber-stamp federal military actions. Agenda item D-1 must be rejected so our laws and values are respected.

Mahalo,

Kealakai Hammond
Honolulu, HI

From: [Ryley Hampton](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, May 7, 2025 1:08:13 PM

Aloha I am Ryley and I am a 14 year old 8th grader from Oahu that goes to a Hawaiian public charter school. I don't want the lease renewed for Pohakuloa or any US base on our 'Āina because I just want to go to Makua valley and appreciate the land without being afraid of getting killed because when the military was done with the bombing they didn't want to clean up after themselves. I also just want to be able to go visit our native land, not just Makua and be able to see the people and things that belong there. Not bombs or army tanks. But Kanaka Maoli, Kupuna and the native trees and plants that have millions of traces back to my ancestors. Another reason I don't want the lease renewed is because the land is my family, the land is what gave me life and what lets me still live on today and seeing our native land being destroyed without even being able to have a say about how the land feels. That is why I have to speak up and I don't want it to be renewed because the aina can't speak so I have to be the voice. In closing I don't want the lease to be renewed for the US military at Pohakuloa or any other base.

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 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,

Adia Poli'ahu Hoeffken

Kula, Maui

Pukana mai ke Kula Kaiapuni o Kekaulike

(808)359-0093

From: [Lynn Hollihan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject D-1
Date: Wednesday, May 7, 2025 2:42:00 PM

The Army's proposed retention of Pōhakuloa perpetuates injustice. This land deserves healing, not more destruction. Reject Agenda Item D-1 and stand for the people.

From: [Linda Hsieh](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Wednesday, May 7, 2025 2:28:23 PM

Aloha Land Board Members:

Mahalo for your time and consideration. 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,
Linda Hsieh
Kea'au, Hawai'i

From: [George Hudes](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Item D1: Army FEIS for Pohakuloa
Date: Wednesday, May 7, 2025 1:38:04 PM

To: State of Hawaii Land Board Members

From: George M. Hudes, Honolulu, HI

Subject: US Army's FEIS for Pohakuloa

I urge you to reject the Army's FEIS for Pohakuloa. Military use of Hawaii's lands has proven extremely destructive over many decades and - given the basic & necessary elements of such military training exercises - the likelihood of continued negative environmental and cultural effects is overwhelming. Additionally, the purposes for which the US military is & has been employed around the world are - to say the least - all too often of questionable ethical and political purpose; this should inevitably be taken into consideration in the commitment of any of Hawaii's precious State resources to the US military.

Thank you.



May 7, 2025

Re: Agenda Item D: Decision Making Regarding the Final Environmental Impact Statement (FEIS) for the Army Training Land Retention at Pōhakuloa

Aloha e Chair Chang and Members of the Board,

Hui Aloha Aina o Honolulu, a membership-based branch of Ka Ahahui Hawaii Aloha Aina (a.k.a. Hui Aloha Aina), strongly urges you to vote to reject, or “not accept” the Final Environmental Impact Statement (FEIS) for continued military use of Pōhakuloa. We reject this FEIS and oppose any new lease or retention by the U.S. Army for Pōhakuloa Training Area.

The Army’s FEIS admits contamination at Pōhakuloa but refuses to study or clean it up. They cannot prove pollutants haven’t reached water sources or ecosystems—because they haven’t looked. They obscure spill data, delete safety documents, and refuse to share basic procedures with the public.

The FEIS brushes aside wildfires, endangered species, and climate change without evidence. It blatantly ignores cumulative impacts—failing the requirements of Hawai’i law. This is unacceptable by any ethical standard.

The Army’s FEIS is not a sincere assessment of environmental impact but rather a bureaucratic cover for the continued desecration of our ‘āina. Accepting this document would send a clear message that even when the military admits harm, there are no consequences—not at Red Hill, not at Pōhakuloa, not anywhere. We are far past settling for such abusive standards.

As a Hui Aloha Aina branch based on O‘ahu, we speak from direct experience of what happens when the U.S. military is not held accountable. In 2021, the U.S. Navy's fuel storage facility at Red Hill contaminated O‘ahu’s drinking water with 20,000 gallons of jet fuel, sickening hundreds, forcing families from their homes, and threatening our island’s most critical aquifer. Despite clear evidence, the military denied, downplayed, and delayed at every step. They still haven’t taken full responsibility or completed the cleanup.

This is not ancient history; it is still happening. Pōhakuloa is Red Hill in slow motion: toxic contamination, no accountability, and a refusal to tell the truth or clean it up. The same arrogance, secrecy, and violence toward our ‘āina and people are present here, too. We will not let it happen again.



Pōhakuloa is Hawaiian national land—seized under illegal occupation and bombed without consent. It is not a training ground. It is not the Army's to destroy. Enough is enough.

We urge the Board to reject this FEIS and oppose the retention of Pōhakuloa by the U.S. Army. Hawai'i deserves better than military occupation disguised as stewardship. Ua lehulehu a manomano ka 'ikena a ka Hawai'i. We know the truth.

Me ka 'oia'i'o,
Hui Aloha Aina o Honolulu, Central Committee

K. 'Ilima Long
Joy Lehuanani Enomoto
Kylie Noelani Akiona
Kawaipuna Kalipi
Lauren Taijeron
Kawena Kapahua
Hilina'i Sai-Dudoit
Noel Shaw
Corey Asano



May 7, 2025

Testimony from KAHEA: THE HAWAIIAN-ENVIRONMENTAL ALLIANCE to the Board of Land and Natural Resources, urging REJECTION of the U.S. Army's Final Environmental Impact Statement for Training Land Retention at Pōhakuloa Training Area, Item D-1

To Members of the Board of Land & Natural Resources,

PROTECTING

NATIVE HAWAIIAN

CUSTOMARY &

TRADITIONAL RIGHTS AND

OUR FRAGILE

ENVIRONMENT

KAHEA: The Hawaiian-Environmental Alliance, a Hawai'i nonprofit, asks you to **REJECT** the U.S. Army's Final Environmental Impact Statement (FEIS) for Training Land Retention at Pōhakuloa Training Area (PTA). PTA encompasses 132,000 acres of federal and state-controlled land. State leases for 23,000 acres expires on August 16, 2029. The Army is proposing an unspecified "real estate" action to retain 22,750 acres, for continued military training.

The FEIS fails to disclose information needed for any meaningful decision-making on the many acts that could constitute the Army's "real estate" actions for these public trust lands. At minimum, the FEIS should be rejected for failing to include the following information:

(1) What is the extent of contamination from past, present, and future military actions?

a. The FEIS discloses significant lead and heavy metal contamination in PTA lands caused by live fire training. The Army's surface soil sampling detected the following in site soils: antimony, arsenic, cobalt, copper, iron, 1-methylnaphthalene, lead, manganese, naphthalene, selenium, silver, total petroleum hydrocarbons (TPH) as diesel range organics (DRO) and residual range organics, and zirconium. FEIS V1 at 3-106.

b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact when areas that are more likely to be affected haven't been studied. FEIS V1 at 3-193.

c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not sampled all of its lands "to determine the presence or absence of munitions constituents." FEIS V2 at D-210.

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it

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KAHEA: the Hawaiian-Environmental Alliance is a non-profit 501(c)3 working to protect the unique natural and cultural resources of the Hawaiian islands. KAHEA translates to English as "the call."

already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) What will it take to restore occupied lands?

a. The FEIS is required to assess impacts of retaining 22,750 acres of public trust lands for military training. Assessing these impacts requires knowing whether the Army can restore these lands, the means by which restoration would occur, and to what degree restoration would occur. What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." FEIS V1 at 3-122.

b. How much will restoration cost? The existing leases only require: "Weapons and shells used in connection with training activities are to be removed to the extent that technical and economic capability exists and provided that expenditure for removal would not exceed the fair market value of the land." DEIS V.1 at 3-14 (emphasis added). Left unchallenged, the Army could simply say that it's too expensive to clean up and leave their mess behind - in fact, the inclusion of such language incentivizes them to do so.

c. The Army said it will comply with the "Comprehensive Environmental Response, Compensation, and Liability Act" (CERCLA), which requires remedial action concerning stored hazardous substances, "necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken before" transferring the land back. However, the Army will not be clear on what this will mean, changing its stance on whether it stores hazardous substances on state lands (see #3c) and refusing to disclose any remediation actions.

d. The federal Defense Environmental Restoration Program/ Formerly Used Defense Sites ("DERP") and the DERP Military Munitions Response Program ("MMRP") are currently the sole means to address military munitions remediation efforts on a statewide scale." DLNR 4/11/2025 Submittal D-4, exh. 4 at 5 (<https://dlnr.hawaii.gov/wp-content/uploads/2025/04/D-4.pdf>). DERP is implemented under the Superfund Amendments and Reauthorization Act ("SARA"), which expanded CERCLA. At its April 11, 2025 meeting, the Board expressed concern about the Army Corps' lack of reporting on ongoing remediation efforts for former-military lands on O`ahu and Hawai`i under these various federal programs. Remediation work for 29,000 acres of the Waikoloa Training Area ("WTA") cost \$217.7M and the projected cost to complete remediation of the rest of the 101,055 acres of WTA will cost \$720M. WTA closed in 1946 and is still being cleaned. By contrast, PTA has been actively used for military operations since 1943 - indicating a much longer, more expensive, and difficult remediation effort.

(3) FEIS lacks estimates and analysis of accumulating contamination.

a. In addition to the harm that has already occurred, how much worse will land contamination get with continued Army operations? What practices does the Army follow to prevent munitions contaminants from accumulating? The Army says it follows Standard Operating Procedures that are not available for public disclosure. FEIS V2 at D-211. The EIS only gives a vague summary. FEIS V2 at E-15 & E-16.

b. The EIS does not tell us how much contamination has accumulated, despite these potential procedures, nor the impacts of the Army's ongoing use of PTA.

c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous waste storage on PTA State lands.¹ Has hazardous waste spilled on state lands? Where are these records? The Army instructed us to file a Freedom of Information Act to obtain hazardous waste transportation manifests.

(4) Why can't the Army start cleaning up now?

a. The state Department of Health ("DOH") commented "There is no need for the Army to wait for the end of the lease period to address known and potential contamination under [federal laws]. Sites identified in the first and second Draft EIS documents . . . that are on state land and no longer within currently active range locations should begin the cleanup process as soon as possible." FEIS V2 at D-223.

b. The Army flagged this comment as "not resolved". The information should be included in the FEIS.

(5) Have contaminants entered groundwater? How does the Army know either way?

a. The Army says there's no evidence that it has, but also "[g]roundwater quality data are limited"; researchers recommended sampling groundwater in shallower aquifers; and no one has done this sampling or analysis. FEIS V1 at 3-193.

b. Without completing the research, how can the Army discount the spread of contaminants, especially highly soluble perchlorate, into these water bodies?

(6) Could contaminants have impacts on human health?

a. DHHL "feel[s] strongly" that the Army should do long-term air-quality and water-table testing at PTA. FEIS V2 at D-220. The Army declined, pointing to a one-year air quality monitoring program in 2007 that did not find levels outside standards and that the aquifer is very deep. However, the Army admits there is a shallow aquifer that has not been tested despite recommendations to do so.

b. The FEIS is inconsistent on this issue. It discloses there are "potentially complete exposure pathways for human receptors from contaminants within the State-owned land surface soils" but because the same is not true for water and sediment, contaminants are "unlikely to impact public health." FEIS V1 at 3-107.

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible

¹ The draft EIS conceded "the Army would continue to truck hazardous substances and [petroleum, oils, lubricants (POLs)] from Kawaihae Harbor to PTA and to truck used POLs, used hazardous substances, and hazardous wastes from PTA to either Hilo or Kawaihae Harbor for shipping off-island to the U.S. mainland or other areas for recycling, reuse, or disposal, as necessary". 2d DEIS V.1 at 3-111.

exposure limit for some job duties, which might lead to increased blood lead levels”. FEIS V1 at 3-117. Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA should be assessed.

a. The FEIS only considers impacts of continuing military training on 22,750 acres of State lands, even though these training operations are inextricable from the entire 132,000 acres of PTA. What are the true cumulative impacts of these operations? How does PTA as a whole impact Hawai‘i’s economy? Housing availability? Native species supposedly “habituated” to the sound of military training and potentially exposed to munitions contaminants?

b. What alternatives are foreclosed by using these lands and resources for military training? Land Board staff also point out this is missing from the FEIS. 5/9/2025 Submittal at 23.

(8) Why does the military start so many fires?

a. Between 1975 and August 2024, there were 1,261 fires of which 1007 fires were due to military activities. FEIS V1 at 3-283. What military activities initiated these fires? How? Pōhakuloa is a TERRIBLE, fire prone place to do military training. Yet, the Army rejects proposals to relocate training - only mitigation for monitoring fires and inhibiting invasive grass growth.

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” FEIS V2 at D-214. The FEIS does not assess impacts on different listed species.

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,² but does not track its own emissions? Why does the Army not disclose aggregated GHG data for all of PTA that it suggests it has?

b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.” FEIS V1 at 4-16. How can it reach this conclusion if it does not have data?

(10) Existing mitigation proven insufficient by ongoing impacts.

a. The FEIS concedes ongoing impacts from past PTA operations - which the Army proposes to continue indefinitely. FEIS V1 at 4-11 - 4-25.

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires

² www.aljazeera.com/news/2023/12/12/elephant-in-the-room-the-us-militarys-devastating-carbon-footprint

and to formalize an access agreement with Native Hawaiian groups and individuals. FEIS V1 at 3-220. As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

c. For all other impacts, the Army will just continue existing mitigation measures. But these are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. 5/9/2025 Submittal at 23

d. The FEIS excluded many lands from its survey of historic properties, including iwi kupuna, on state lands. FEIS V1 at Fig. 3-8. How can the Army assess impacts to cultural resources if it does not even know if they are there?

Far from providing a comprehensive reference, the Army's FEIS obstinately refuses to disclose the foreseeable harms their actions cause to Hawai'i's land, water, cultural resources, and its people. If the Army does not know, the Board should reject the FEIS and require the Army to conduct necessary investigations as part of this environmental review process and not relegate these important issues to some unaccounted-for future scenario.

Thank you for considering our testimony.

KAHEA Board & Staff 2025

From: [Laura Johnson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, May 7, 2025 2:04:39 PM

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

My name is Laura Johnson 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,
Mrs. Laura Johnson
Kailua Kona*

From: [Jeffrey Kahaunaele](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 2:14:53 PM

Aloha, my name is Jeffrey Kahaunaele. I am a thirteen-year-old student at Ka Waihona o ka Na'auao. I do not want the lease renewed for Pohakuloa or any other U.S. base on our 'Aina because I have studied in school that the bombing in Pohakuloa is very wrong and the land there is very sacred to us native Hawaiians. Also, the lease costs only \$1 for 65 years. I have also studied that the Military has used white phosphate, which is very illegal in Hawaii and poisons our sacred 'Aina. Also, the Military has already eradicated Kaho'olawe. Another thing is that the Military poisoned the aquifer that goes to 70% of the island of O'ahu. In closing, I do not want the lease renewed for Pohakuloa or any U.S. base.

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,

Jendale Hauoli Keola Lucia Kahuanui

Honolulu, Oahu
Kanakanaka Maoli
808-979-4188
Sent from my iPhone



Hawai'i Island Chamber of Commerce

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TESTIMONY BEFORE THE BOARD OF LAND AND NATURAL RESOURCES

Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai'i

Friday, May 9, 2025 at 9:00 AM

Aloha Chairperson Chang and members of the Board of Land and Natural Resources,

The Hawai'i Island Chamber of Commerce is a 501(c)(6) non-profit organization representing more than 350 member businesses and non-profit organizations, individual members and thousands of employees across the of Hawai'i Island. Our mission is to provide leadership and advocacy to foster a successful business environment in East Hawai'i.

Pōhakuloa Training Area (PTA) is a premier military training facility in Hawai'i and the Pacific. It plays a vital role in our local economy, directly employing 230 individuals and contributing approximately \$74 million annually. PTA also serves as a critical emergency response hub, often being the first to respond to incidents along the Daniel K. Inouye Highway, and provides ongoing support to our community through education, outreach, and public safety partnerships. The Hawai'i Island Chamber of Commerce's vision is to enhance our community's quality of life through a strong, sustainable economy. PTA supports this vision through significant local infrastructure projects—such as Quonset huts, rock quarries, and drainage systems—that frequently involve local contractors. Additionally, visiting soldiers infuse our economy with travel and spending.

PTA's value to our island extends beyond economics. The training area is instrumental in supporting Hawai'i's First Responders and law enforcement agencies. The Hawai'i Police Department, Hawai'i Civil Defense Agency, State Office of Homeland Security, Hawai'i Emergency Management Agency, and other emergency response entities regularly utilize PTA to conduct essential training that ensures readiness and public safety. PTA's facilities provide a challenging and realistic training environment crucial for maintaining preparedness.

Moreover, PTA has a long-standing mutual aid agreement with the County of Hawai'i, significantly enhancing emergency response capabilities in the region. PTA provides critical support within a 500-square-mile area across the Saddle Road region and responded to 121 emergency calls in 2022 alone. These included wildfires, motor vehicle accidents, lost hikers, and other emergencies—demonstrating PTA's indispensable role in protecting our community.



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Importantly, the retention of PTA is vital for the readiness of the Hawai'i Army National Guard and its continued support to civil authorities. Since its inception in 1852, the Hawai'i National Guard has played a pivotal role in disaster response and community safety—from the Sailor's Riot during the Kingdom of Hawai'i to more recent efforts like the Kīlauea eruption in 2018, the Hanapēpē and Wainiha floods, statewide COVID-19 response from 2020–2022, and the Lahaina wildfire in 2023. These operations required highly trained personnel, and PTA remains the premier location in the state where such mission-critical training can occur.

The Hawai'i Army National Guard's use of PTA dates back to 1950, when the 487th Field Artillery Regiment first surveyed the site for training. Today, PTA continues to serve as a key location where our Guard units develop the leadership, operational, and planning capabilities needed to respond effectively to natural disasters and other hazards across the state.

Beyond disaster readiness, PTA actively engages with the local community through events like Experience PTA Day, guided tours, school programs, public speaking engagements, and participation in parades. PTA also supports youth programs like Civil Air Patrol and Boys and Girls Club, and maintains active involvement in community organizations. These efforts have helped build trust and strengthen the relationship between PTA and the people of Hawai'i Island.

In closing, the Hawai'i Island Chamber of Commerce strongly supports the continued use of State-owned lands by the U.S. Army at Pōhakuloa Training Area. Its economic, emergency response, and community engagement contributions are irreplaceable, and its role in supporting our National Guard and first responders is crucial for ensuring the safety and resilience of Hawai'i's people.

Sincerely,

Carla Kuo
Executive Officer
Hawai'i Island Chamber of Commerce

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

My name is Ariana and I am from Hale'iwa, Oahu. 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 does not have 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.

Thank you,

Ariana Lanzer

From: [Bianca Lindsey](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Wednesday, May 7, 2025 3:35:37 PM

Aloha!

Our environment and cultural heritage are under constant pressure. The Army's FEIS ignores this reality and proposes more of the same. Vote no on Agenda Item D-1.

Mahalo!

Bianca Lindsey

From: [Paxton Lum](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, May 7, 2025 2:11:02 PM

Aloha, my name is Paxton Pomaikai Elau Lum Kou Inoa. I am a 13-year-old student at Kawaihona Public Charter School on Oahu. As a 7th grader, I'll be writing this note. I don't want the lease renewed for Pohakuloa or any other military base on our aina because I'm a 7th-grade student who has been studying what our military people are doing, and I wouldn't wanna see it keep going for how many more years. Look at Kaho'olawe, it's trashed, and we could still renew it and restart. Our aina, known as our great grandma, is getting hurt because of the bombing, and we don't know that they might take over all over Oahu, and it has a bad reputation.

From: [Leinaala Maka-Adric](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Wednesday, May 7, 2025 1:31:15 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Leinaala Maka-Adric, 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,
Leinaala M
Lihue, Kauai

From: [Hiilani Makahanaloa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D-1 opposition - Hi'ilani Makahanaloa
Date: Wednesday, May 7, 2025 1:28:23 PM

Aloha,

Aloha my name is Hi'ilani Makahanaloa and I am writing in opposition of agenda item D-1. As a member of the community, I believe the BLNR has a duty to protect sacred lands. The Army's FEIS is incomplete and fails to consult properly with cultural practitioners. It should not move forward. Please deny the EIS for the following reasons:

1. The Army's FEIS failed to respond adequately to serious public concerns raised during the draft EIS process.

- Their responses are not commensurate with the scale of cultural, environmental, and legal impacts raised.

2. Disregard for Hawai'i law and legal process:

- The FEIS disregards clear Hawai'i law, as pointed out by DLNR staff.
- The Army is not above the law, yet refuses to complete cultural and environmental impact assessments on federal lands.
- This undermines the state's legal authority and process.

3. Failure to meet public trust duties:

- The BLNR has a constitutional duty to protect cultural and natural resources for future generations.
- Without proper biological and cultural surveys, the Board cannot fulfill its public trust responsibilities.
- The FEIS leaves critical questions unanswered—about endangered species, iwi kūpuna, and sacred sites.

4. Harm to Native Hawaiians is ongoing and ignored:

- The FEIS ignores the unique relationship between Native Hawaiians and the 'āina at Pōhakuloa.
- The 1993 Apology Resolution acknowledges this relationship, yet the FEIS fails to account for the harms to health, identity, and spirituality caused by six decades of bombing and desecration.

5. Dangerous precedent if this FEIS is accepted:

- Accepting this deficient FEIS would set a harmful precedent.
- Future applicants may use this as an excuse to bypass proper environmental and cultural review.
- It weakens the integrity of BLNR's oversight for years to come.

6. Avoidable harm from lack of surveys:

- The refusal to complete biological and archaeological surveys could lead to the permanent loss of endangered species, iwi kūpuna, and cultural artifacts.
- These are irreplaceable connections to culture, history, and identity.

7. Army's failure to consult 'Aha Moku is unacceptable:

- The Army refused to consult with 'Aha Moku despite clear instructions from DLNR staff.
- This shows a pattern of bad faith, ignoring lawful consultation requirements and community voices.

8. Final ask:

- Therefore, I urge you to reject the Final Environmental Impact Statement (Agenda Item D-1).
- Uphold your mission, the law, and the rights of the Hawaiian people.

Mahalo,
Hi'ilani Makahanaloa

From: [Logan Malaki](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] POHAKULOA TESTIMONY
Date: Wednesday, May 7, 2025 2:15:32 PM

POHAKULOA TESTIMONY

Aloha, my name is Logan Malaki. I am 13 years old and a student at Ka Waihona. The reason why I would like the State not to renew the release is because in the future I wouldn't want to go to Hawaii Island and see the Aina damage, or very, very unclean. Also, looking back in history, the military is giving off a bad look because of what they did to Kaho'olawe. That bums me out because I will never be able to experience the luxurious and beautiful land. Also, in the future, I want to be able to go to Hawaii Island and see how beautiful it is. In conclusion, this is the reason why I wouldn't want the state to renew its lease



May 7, 2025

**MEETING OF THE BOARD OF LAND
AND NATURAL RESOURCES
Agenda Item D-1**

May 9, 2024, 9:00 a.m.

DLNR Boardroom, Kalanimoku Building
1151 Punchbowl St., Room 132

**Re: TESTIMONY IN STRONG OPPOSITION TO ACCEPTANCE OF THE FINAL ENVIRONMENTAL
IMPACT STATEMENT FOR ARMY TRAINING LAND RETENTION AT PŌHAKULOA
TRAINING AREA (ITEM D-1).**

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

Please accept these comments submitted by the Center for Biological Diversity (Center) in **STRONG OPPOSITION of Agenda item D-1**, the Final Environmental Impact Statement (FEIS) for the U.S. Army's proposed long-term retention of 22,750 acres of state-owned land at Pōhakuloa Training Area (PTA). Based on the record before you—including the Department of Land and Natural Resources (DLNR) staff submittal, agency comments, and extensive public input—the Board must reject the FEIS pursuant to Hawai'i Administrative Rules § 11-200.1-28.

The Center is a non-profit 501(c)(3) membership corporation dedicated to the protection of native, threatened, and endangered species and the habitats they depend on to survive. Through science, policy, and environmental law, the Center is actively involved in the protection of Hawaiian wildlife and wild spaces. The Center has more than 88,000 members throughout the United States, including Hawai'i, with a direct interest in ensuring the protection of Hawaiian species and the habitat they depend upon to survive.

The FEIS fails to meet the requirements of Chapter 343 and HAR § 11-200.1. It omits critical data, misrepresents scientific research, minimizes significant adverse impacts, and undermines the public's ability to participate meaningfully in decisions that will affect generations to come. In its current form, this document does not support informed decision-making and cannot be lawfully or responsibly accepted by the Board.

The FEIS is deficient from the outset because it lacks essential biological and archaeological surveys for large portions of the lands under consideration. This includes

unsurveyed areas that the Army proposes to retain for continued high-intensity military training. As confirmed by the State Historic Preservation Division (SHPD), many of these lands may contain unrecorded Native Hawaiian burials, cultural sites, and rare ecological communities. The absence of these surveys makes it impossible to evaluate the full extent of the impacts of the Proposed Action. Moving forward without this data ignores well-established environmental review principles and violates the legal standard requiring that agencies disclose and analyze impacts before decisions are made.

The Army's treatment of endangered species and native ecosystems is also deeply flawed. The FEIS relies heavily on outdated and limited field surveys, some of which involved only hours of observation during unsuitable weather. It dismisses the risks posed to dozens of rare and federally protected species found at PTA, including 'ōpe'ape'a, nēnē, pueo, and palila, without providing meaningful or updated biological analysis. The document repeatedly asserts, without credible evidence, that wildlife have habituated to years of explosive training activities and extreme noise exposure. In reality, the best available science shows that repeated military disturbance—including noise exceeding 115 decibels—alters foraging behavior, disrupts reproductive success, and can result in long-term population declines. Yet the Army conducted no species-specific assessments and offered no site-specific mitigation commitments, in clear violation of HEPA, NEPA and the Endangered Species Act.

Similarly, the FEIS's discussion of wildfire is superficial and inadequate. Wildfires at PTA have been frequent, large-scale, and directly linked to training activities. Yet the Army has failed to provide updated fire modeling, an enforceable fire management plan, or a meaningful evaluation of the cumulative ecological damage caused by decades of repeated burns. SHPD rightly raised concerns about the impact of fire on cultural and historic sites, noting that previous fires have already damaged significant properties. Despite this, the FEIS fails to offer formal mitigation protocols, or any mechanism to protect iwi kūpuna and sacred landscapes from future destruction.

Cultural access remains another unaddressed area of concern. The Army claims it will develop a formal access plan to mitigate impacts to Native Hawaiian cultural practices, but provides no detail, timeline, or binding commitment to ensure access for cultural and lineal descendants. SHPD has called for guaranteed access to burial areas and cultural sites, but this essential recommendation has not been incorporated into the FEIS. The Army's vague and discretionary language fails to ensure that Native Hawaiian rights will be respected or restored during the proposed lease term.

Perhaps most egregiously, the FEIS ignores known and suspected contamination at PTA. Despite longstanding concerns over unexploded ordnance, heavy metals, fuel spills, and other toxins, the Army offers no recent groundwater or soil testing data. Given PTA's location atop porous lava substrates that contribute to Hawai'i Island's freshwater recharge, this omission represents an unacceptable risk to public health and environmental integrity. The lack of

baseline environmental testing undermines all assurances made about safety, long-term stewardship, or eventual remediation.

The FEIS also fails to fairly or rigorously evaluate the No Action Alternative. The Army dismisses this alternative without serious analysis of the environmental, cultural, and legal benefits of remediating and restoring state lands for conservation, cultural use, and public access. This violates the very core of environmental review—providing decision-makers and the public with an objective comparison of options to inform a reasoned and lawful decision. Finally, we note that DLNR staff and divisions, including SHPD, provided detailed comments highlighting many of these deficiencies. The staff submittal appropriately refrains from recommending acceptance and instead presents the Board with the legal option to reject the FEIS. That is the only responsible and lawful course of action. The document before you is not adequate under HAR § 11-200.1-28. It fails to disclose significant impacts, does not rely on the best available science, omits critical data, and disregards key cultural and environmental responsibilities of the State.

For these reasons and more, the Center respectfully requests the Board **reject the Final Environmental Impact Statement**. Doing so is essential to uphold Hawai'i's environmental laws, protect endangered species and cultural heritage, and honor the public trust in state lands. The Army must revise and resubmit a lawfully sufficient EIS that includes the necessary data, analyses, and mitigation to support an informed and responsible decision. Until then, this process cannot and should not proceed.

/s/ Maxx Phillips

Maxx Phillips, Esq.

Hawai'i and Pacific Islands Director, Staff Attorney

Center for Biological Diversity

1188 Bishop Street, Suite 2001

Honolulu, Hawai'i 96813

(808) 284-0007

MPhillips@biologicaldiversity.org

From: [Jean McKeague](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Wednesday, May 7, 2025 2:16:31 PM

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,
Jean Mckeague
Keaukaha, Hawaii

Aloha Land Board Members:

I am writing to express my personal 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 to me as Kanaka Ōiwi and as someone dedicated to restoring our Native ecology professionally. 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,
Taylor Ka'ili McKenzie

From: [Kaiea Medeiros](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's EIS
Date: Wednesday, May 7, 2025 3:21:05 PM

Aloha,

My name is Kaiea Medeiros and I am encouraging BLNR to reject/deny the army's EIS of Pōhakuloa.

The state needs to uphold their kuleana of, Ua mau ke ea o kai 'āina i ka pono. Nothing about the Army's or military actions are pono to 'āina by any stretch of the imagination.

Be better. So what's pono.

Aloha 'āina 'oia'i'o.

Mālama.

From: [dterlep08](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Wednesday, May 7, 2025 1:16:54 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Dalyn Meheula-Solomon, 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,
Dalyn Meheula-Solomon
Aiea, Hawaii

From: [Leilani Nevarez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 3:42:05 PM

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,

Leilani Nevarez

Honolulu, Hawai'i

Kanaka, Native Hawaiian born in Waikiki, Military Wife,, mother of 3 keiki & Educational Assistant for DOE

(808) 497-6915

From: [Ezra Noa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 2:10:40 PM

Aloha, I am Ka'ano'i Noa, a 13-year-old student on O'ahu. I don't want the lease Renewed for Pokakuloa or any other US base on our 'Aina, because the bombs are ruining our 'Aina, because they get into the soil and later get in our crops, drinking water, and injure Animals. Also, as a Hawaiian, Malama Aina is important because it saves and helps our land. In closing, I don't want the lease renewed for the US military at Pohakuloa or any other base.

From: [Lala Nuss](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to REJECT (not Accept) the Final EIS on Pōhakuloa
Date: Wednesday, May 7, 2025 2:57:54 PM

Aloha mai,

I am a resident of Moku o Keawe. I am submitting written testimony to REJECT the Pōhakuloa EIS as it is incomplete and insufficient from both an environmental and cultural perspective. The EIS mentions “possible impacts on human, cultural, and natural environment”, without specifying exactly how each may be affected. I advocate for a CIS and a new Traditional Cultural Practices (TCP) study, as the one that the Army currently uses is from 2012. The current TCP study claims there to be no way to determine impact to cultural resources because of the “lack of literature”, yet it didn’t utilize any Hawaiian language resources. The current TCP goes off the basis that there’s a “lack of information on literature concerning cultural practices and beliefs related to saddle road”. This is completely untrue. A CIS and new TCP study should be conducted to determine the impact to cultural resources and practices, before this EIS can be accepted.

Pōhakuloa is home to several endangered native species: the ‘io (hawk), nēnē (goose), ‘u‘au (petrel), palila (a honeycreeper) and the ‘ōpe‘ape‘a (Hawaiian hoary bat). In addition, 15 bird species protected under the Migratory Bird Treaty Act are found at Pōhakuloa. There are two dozen endemic plant species at Pōhakuloa that are considered endangered, threatened or “species of concern.”

In addition to the inefficient EIS concerns, directly beneath Pōhakuloa, at an elevation of about 4,500 feet, is a massive aquifer, likely the largest in the pae ‘āina and a critical freshwater resource for the island. With the jet fuel leak at Red Hill that imperiled O‘ahu’s main aquifer still fresh in our collective memory, the image of bombs exploding over the water table at Pōhakuloa is terrifying. The artillery impact zone is so large (51,000 acres) and contaminated that it is considered too dangerous to clean. The entirety of the training area is located on land zoned for conservation. There is probably no activity more diametrically opposed to the purpose and function of conservation land than military live-fire training and maneuvers.

Mahalo for your consideration.

Me Ke Aloha,

Laurien "Lala" Nuss
her/she/we
Conscious Concepts
'ĀINA | ARTS | EQUITY
consciousconcepts808.com
consciousconcepts808@gmail.com
808.258.5117



'A'ohe hana nui ke alu 'ia.

"No task is too big when done together by all."

Ōlelo No'eau # 142



Native Hawaiian LEGAL CORPORATION

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Phone (808) 521-2302 • Fax (808) 537-4268 • www.nativehawaiianlegalcorp.org



Testimony to the BOARD OF LAND AND NATURAL RESOURCES

Relating to 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

May 9, 2025

9:00 a.m.

DLNR Boardroom

Aloha e Chair Chang and members of the Board of Land and Natural Resources:

The Native Hawaiian Legal Corporation, on behalf of PIHA,¹ a Native Hawaiian organization comprised of cultural and religious practitioners, urges the Board of Land and Natural Resources to **reject** the final environmental impact statement ("FEIS") for the public trust lands leased by the U.S. Army at Pōhakuloa, because it does not meet the legal standards for acceptance. Department of Land and Natural Resources ("DLNR") staff has clearly described the document's severe flaws and shortcomings in the materials for this meeting. Those concerns render the FEIS unacceptable. BLNR should insist on an FEIS with sufficient information necessary for it to fulfill its fiduciary duties when making decisions about Pōhakuloa, as required by Hawai'i law.

The land at issue is "held by the State in trust for the benefit of Native Hawaiians and the general public." *Ching v. Case*, 145 Hawai'i 148, 152, 449 P.3d 1146, 1150 (2019). As trustee, BLNR has "the highest duty to preserve and maintain the trust lands." *Id.* at 162, 449 P.3d at 1160.² This kuleana includes the duty to mālama 'āina, or care for the land. *See id.* at 162 n.26,

¹ PIHA's purpose is to affirm and maximize the protection, conservation, rehabilitation, and healing of Hawai'i's sacred lands and waters.

² As the Hawai'i Supreme Court explained:

Under the Hawai'i Constitution, all public natural resources are held in trust by the State for the common benefit of Hawai'i's people and the generations to come. Additionally, the constitution specifies that the public lands ceded to the United States following the overthrow of the Hawaiian Monarchy and returned to Hawai'i upon its admission to the Union hold a special status under our law. These lands are held by

449 P.3d at 1160 n.26. It is impossible to fulfill the state's obligations to 'āina and beneficiaries of the trust duty with a deeply flawed EIS that falls short of the state's own expectations.

To their credit, DLNR staff has provided the BLNR with the legal rules and standards for sufficiency of an FEIS and provided a detailed analysis of the FEIS's shortcomings. *See* Hawai'i Administrative Rules ("HAR") § 11-220.1-28(a) ("Acceptability of a final EIS shall be evaluated on the basis of whether the final EIS in its completed form, represents an informational instrument that fulfills the intent and provisions of chapter 343, [Hawai'i Revised Statutes ("HRS")], and adequately discloses and describes all identifiable environmental impacts and satisfactorily responds to review comments."); *see also* HAR §§ 11-200.1-27. The staff submittal recognizes that the FEIS fails to address impacts to the federally-owned impact area of Pōhakuloa; relies on an incomplete archaeological inventory and outdated studies on endangered biological resources; and provides unsatisfactory responses to staff's comments on the draft EIS. Staff also raised concerns that military use is inconsistent with the conservation district and that the FEIS failed to include any other alternatives that would comply with the allowable uses within that land use district.

PIHA and its members share staff's concerns as beneficiaries of the public land trust keenly aware of the trauma at Pōhakuloa and the failure of the FEIS to disclose the condition of the land that the army has devastated for decades. Auntie Maxine Kahaulelio, PIHA member and one of the named plaintiffs in *Ching v. Case*, 145 Hawai'i 148, 449 P.3d 1146 (2019), has personally observed shell casings littering the ground at DLNR's annual inspections of Pōhakuloa. In response to the Hawai'i Supreme Court holding that BLNR must "reasonably monitor trust property to ensure it is not being harmed" and ensure the army's compliance with the lease, *id.* at 177-78, 449 P.3 at 1175-76, a court ordered management plan recommends that DLNR inspect approximately 500 acres of the army's lease area every year (approximately two percent of the entire leased area). Since 2022, DLNR has conducted three inspections covering less than 1,200 acres of the leased lands at Pōhakuloa (approximately five percent of the leased area); it has not seen the rest. For the purpose of today's decisionmaking, BLNR must rely on the army to fill in the blanks. Yet the FEIS does not disclose the condition of the remaining 21,550 acres in terms of the amount of munitions that still have not been cleaned up.³ If shell casings and other debris were observed in the planned inspection areas, the

the State in trust for the benefit of Native Hawaiians and the general public. Accordingly, our constitution places upon the State duties with respect to these trusts much like those of a common law trustee, including an obligation to protect and preserve the resources however they are utilized.

Ching, 145 Hawai'i at 152, 449 P.3d at 1150.

³ Similarly, with the incomplete archaeological survey, the army has managed to avoid completing a meaningful cultural impact assessment, which is critical to PIHA and other Native Hawaiian practitioners. It has not documented all cultural and historic sites let alone assessed the intangible impacts to cultural heritage.

likelihood that the rest of the lease area is being properly cared for is highly unlikely. This is important baseline information that should be disclosed as part of the environmental review process.

Accepting an inadequate FEIS with these severe flaws raises serious legal issues and practical concerns about the ensuing impact on Pōhakuloa — a sacred place with deep historical and continuing significance to the culture and traditional practices of Native Hawaiians. This ‘āina has suffered severe trauma due to military and state mismanagement, including breaches of trust that have been litigated in the past. Looking ahead, the state must ensure that its decisions affecting Pōhakuloa comply with its significant trust duties. The FEIS is a legal tool to ensure that BLNR is empowered with information needed to do that for this ‘āina and all lands for which BLNR is responsible. BLNR cannot accept a broken tool to complete the important work ahead for this place.

As drafted, the FEIS does not properly function as an informational document, *see* HRS § 343-2, or comply with the purpose of the Hawai‘i Environmental Policy Act⁴; instead, it serves as a justification for continued degradation and desecration of Pōhakuloa. To approve a document that is unsatisfactory to your own staff and that would facilitate the use of this sacred land in a manner inconsistent with the law is the opposite of mālama ‘āina and the BLNR’s duties under the public trust.

Mahalo,



Ashley K. Obrey, Senior Staff Attorney
For PIHA

⁴ Pursuant to HRS chapter 343:

The legislature finds that the quality of humanity’s environment is critical to humanity’s well being, that humanity’s activities have broad and profound effects upon the interrelations of all components of the environment, and that an environmental review process will integrate the review of environmental concerns with existing planning processes of the State and counties and alert decision makers to significant environmental effects which may result from the implementation of certain actions. The legislature further finds that **the process of reviewing environmental effects is desirable because environmental consciousness is enhanced, cooperation and coordination are encouraged, and public participation during the review process benefits all parties involved and society as a whole.**

It is the purpose of this chapter to establish a system of environmental review which will ensure that environmental concerns are given appropriate consideration in decision making along with economic and technical considerations.

HRS § 343-1 (emphasis added).

From: [Shaylyn Kehaunani Ornellas](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony - Pohakuloa
Date: Wednesday, May 7, 2025 2:42:46 PM

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

‘O Shaylyn Kehaunani Ornellas ko’u inoa, 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.

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 strongly urge you to REJECT the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for healing, not further desecration.

Please help us stand for the ‘āina. Reject the Final EIS. Future generations need you to vote Pono.

Mahalo piha,

Shaylyn Kehaunani Ornellas

Ka ipuha’a, Kaua’i

Aloha, I am Haylee Viela, a **13 year old Hawaiian student** on O'ahu that attends Ka Waihona o Ka Na'auao. I do not want the lease renewed for pohakuloa or any other base on our 'āina because it will pollute our land, and it already has been done. If it had a good impact on our land then maybe I would reconsider it but since it has done bad things to our land then I think we should take it away. Also, think about the next generations because they will have to live in this mess #fordakeiki. And for me, I still have lots of time to live and I don't want to see our 'āina go into the wrong hands. And last but not least seeing what my ancestors have been surviving through. Coming to my closing I would not like the lease to be renewed to make our future better.

From: [Hauoli Pakele](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Stop the Desecration of Pōhakuloa
Date: Wednesday, May 7, 2025 3:22:37 PM

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,
Dean Lance H. Pakele
Keaukaha, Hawai'i

This message is the property of Ka 'Umeke Kā'eo and any attachments are confidential to the intended recipient at the e-mail address to which it has been addressed. If you are not the intended recipient, you may not copy, forward, disclose or use any part of this message or its attachments. If you received this transmission in error please notify the sender immediately by e-mail or contact Ka 'Umeke Kā'eo at its@kaumeke.net and then delete this message from your system.

From: [Kala'i Pakele](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 2:15:32 PM

Aloha, I am Kala'i Pakele, a 13-year-old student from Kawaihona. I do not want the lease renewed for Pohakuloa or any other US base on our aina because they're poisoning our land by releasing white phosphate. It hurts me watching our land get blown up. Growing up, every time I used to go down to Makua and I hated having to watch out where I stepped because the military had left undetonated bombs. I don't want the land to end up like Kaho'olawe, where the land has no water in the aquifers.

From: [Mei Linn Park](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa: reject the Army's EIS
Date: Wednesday, May 7, 2025 2:20:11 PM

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:

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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,

Mei Linn N. Park, PhD, MSW

From: [Reese Pelen](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pokahuloa Testimony
Date: Wednesday, May 7, 2025 2:12:37 PM

Aloha, I am Reese Pelen, a 13 year old that goes to KWON on Oahu. I don't want the U.S. to renew the lease for Pohakuloa because the U.S. base does NOT clean up the bombs after each year. What I do want is for them to leave and clean up all the bombs they shot. Just to let you know I AM a 13 year old kid and I AM in middle school. If a 13 year old can tell the U.S. what they're doing wrong then I think that you need to go back to school. Because how entitled are you to think that you can come into our island and take our island. Also having to bomb our island. Now please do NOT renew the lease because you're killing our island slowly. In closing, I do want them to leave this island but before that I, Reese Pelen want them to clean up the mess they made over 60+ years.

From: [Pokii Piilani](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa testimony
Date: Wednesday, May 7, 2025 2:15:13 PM

Aloha, I am Poki'i Aualii Pi'ilani, and I am a 13-year-old student living on Oahu. I do not want the lease renewed for Pohakuloa or another US base on our 'Āina, because we are supposed to Mālama our 'Āina, but I've seen that the US bases blow up thousands and thousands of land and vegetation, and calling it "practice". I'm mad about this because after bombing, no one cleans up the waste after the shootings and bombing. I'm only 13, and I can see that our land is dying, and we need to stop harming our 'Āina. How can we save our 'Āina? Stop bombing our land and renew the lease. In closing, I do not want the lease to be renewed for the US military at Pohakuloa or any other base.

Aloha, I am Nanea Puailihau, a 13 year old student at the school Ka Waihona o ka Na'auao in Nanakuli on the island of O'ahu. As a young hawaiian I don't want the lease removed for Pohakuloa or any other US base on our 'āina because it is not protecting our land and because I think it's kinda stupid for them to just use the land to supposedly practice bombing and also they don't even clean up after themselves. In closing, I don't want the lease removed for the US military at Pohakuloa or any other base.

From: [Napua Puaoi](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] reject agenda item D-1
Date: Wednesday, May 7, 2025 2:04:29 PM

There is no public trust without transparency, accountability, and lawful review. The FEIS fails all three. Please reject Agenda Item D-1.

From: [kaira.resch](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] FEIS in Item D-1
Date: Wednesday, May 7, 2025 1:33:13 PM

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

My name is Kaira Resch 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,
Kaira Resch

From: [Abigail Rose](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] End military leases on Pōhakuloa
Date: Wednesday, May 7, 2025 3:26:54 PM

As a long time resident and voter in Hawai‘i, I want to take this opportunity to speak out against the continued degradation of the land due to the Army’s continued use of Pōhakuloa. The area being used for military maneuvers is in a sacred area between the two mountains Mauna Loa and Mauna Kea.

There is nothing in this lease that benefits the Hawaiian people. The area is polluted with unexploded ordinance and other dangerous contaminants including depleted uranium.

We live on tiny islands where land is at a premium. Therefore, I oppose any bills that would seek to extend these \$1 leases. The army needs to clean up it’s mess and get out of Pōhakuloa.

Sincerely, Abigail Rose
Kapolei, Hi

From: [Forrest S](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony regarding military use of Pōhakuloa
Date: Wednesday, May 7, 2025 1:36:35 PM

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,

Forrest Scrutton
Winter Garden, Florida
405 southern pecan circle
971-803-0586

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

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island. This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data. There's a number of key reasons in which warrant immediate denial including that the land has already been contaminated with the following: lead, petroleum compounds, arsenic, and other munition constituents; and there's been no call to action in performing a cleanup. They've failed to keep contaminated soil, water, and air away from nearby communities and cultural practitioners. This is because they've never conducted comprehensive soil and groundwater tests, regardless of knowing there were risks in contamination developing through highly permeable soils and shallow aquifers. Due to the Army's lack of transparency, and refusal to disclose Standard Operating Procedures it holds limited contamination. The land is not safe. With over 1,000 fires caused by military activities since 1975, the U.S. Army has continued to threaten fragile species like the Palila. There's also incomplete greenhouse gas data and they're making unsupported claims and climate impacts. Lastly, there's been no cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review. This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk. I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Mahalo,

Aliyah Shklov

Honolulu/ Oahu

ashklov@gmail.com

Aloha I am Jaesha-Ann Silva I'm 13 years old and I go to Ka Waihona public charter school, as a hawaiian I know how spiritual my ancestors are and how much love and care they put into the islands of Hawaii. Having that sacred land that you use to bomb and destroy is causing so much Hawaiians to feel the pain of our beautiful land that was once held generations of hawaiian and as hawaiians we have lost so much of our culture and people that we love and cared for. I don't want the leas renewed for the pohakuloa or any other hawaiian land and its crazy because we have been fighting for that land back for 40 years and our ancestors our parents our brothers our sisters my family tried and died trying so I'm here asking for that land back so we can free our pain my pain from losing my family and the others that lost theres.

From: [Kele Sipman](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Army FEIS
Date: Wednesday, May 7, 2025 3:46:26 PM

Enough is enough! The army has already admitted to widespread contamination but what have they done to remedy the situation? We in Hawaii have so little let, do not let them ruin anymore of our land!
Ah-Sun Sipman

Sent from my iPhone

From: [Travis Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's EIS on Pōhakuloa
Date: Wednesday, May 7, 2025 1:04:56 PM

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,

Travis Smith
Waimanalo, Hawaii

Travis Smith
Primary Teacher/Grade 4
O: (808) 261-0707 ext. 5210



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,
Cherish Kawai Wa'a
Ewa Beach, Oahu
Kanaka Maoli
Contact Information
Mobile: 808-219-4855
Email: cherishwaa@gmail.com

From: [Jazmen Waiolama](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, May 7, 2025 2:03:32 PM

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).

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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,

[Your Full Name]

[City, Island]

[Kanakanaka / Cultural Practitioner / Title if applicable]

[Contact Information]

From: [brittany walker](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] PROTECT POHAKULOA
Date: Wednesday, May 7, 2025 2:07:07 PM

TO WHOM THIS MAY CONCERN;

It is clear from DLNR staff submittals that this FEIS lacks necessary data and legal compliance. I urge you to reject Agenda Item D-1.

Sincerely,
Dr. Brittany Walker

From: [Diane Ware](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda item D-1 5/9/25
Date: Wednesday, May 7, 2025 1:31:49 PM

Aloha no Chair Chang and Members of the Board of Land and Natural Resources,

My name is Diane Ware from Moku o Keawe and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1. As the DLNR staff submittal 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.

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. I urge you to malama pono and not let the military to continue to disregard our people and rights.

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

Mahalo nui for the opportunity to testify.

Diane Ware
808-967-8642
P. O. Box 698
99-7815 Kapoha
Volcano HI 96785

From: [Alani Watson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 2:10:07 PM

Aloha, I am 'Alani a 12 year old student on O'ahu at Ka Waihona. I do NOT want the lease renewal for Pohakuloa or any other US base on Hawai'i because it is hurting the land and also polluting the air. It is also destroying sacred land. The US army is also disturbing this area that should be left alone for the Kanaka Maoli to take care of. Next lots of families ancestors might be buried their and you guys are just choosing to trash it and pollute it. They also should stop bombing it because it may be just land to them but to us and to our kupuna it is a very sacred place and Hawai'i is our mother. It is also very wrong because the island is being broken and it is going to end up like Kaho'olawe. They may think that they are protecting us from enemies but we were perfectly fine before they came and we are very resourceful. Instead of coming here and destroying our land so called protecting us they are the enemy cause even though they are trying to protect us from being destroyed they are the main ones destroying our 'aina. The enemy is only trying to come and get us because the US is here. In conclusion, I do NOT want the lease renewal for the US military at Pohakuloa or any other base.

Mahalo.

From: [Koh Ming Wei](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] OPPOSE US Army retention of Pōhakuloa
Date: Wednesday, May 7, 2025 2:23:03 PM

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.

Na'u me ke ha'a' ha'a,
Koh Ming Wei PhD.
Education for Sustainability
Māmaki Ola Farm and Education
East Rift Spirits
Center for Getting Things Started, Executive Director/Ecoliteracy Educator -
mingwei@c4gts.org
808 443-9231 (cell)

Wisdom demands a new orientation of science and technology towards the organic, the gentle,

the non-violent, the elegant and beautiful.
EF Schumacher

From: [Ariana Whalen](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 2:58:33 PM

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 beautiful Hawai'i 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.

Mahalo nui loa,
Ariana Whalen from Honolulu, HI

Ariana Whalen
[LinkedIn](#) | [Astrology & More...](#)

From: [Sofia H Wilt](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Lease Testimony
Date: Wednesday, May 7, 2025 2:40:17 PM

I am in strong opposition to renewing leases at Pohakuloa.

It is abusive to the land and Hawaiian culture to have War Games with long lasting damages on this sacred land.

I ask that the leases are NOT renewed.

Thank you -

Sofia Wilt, FDN-P
Kapaau Hawaii



SOFIA WILT FDN-P

Certified Functional Diagnostic Nutrition Practitioner

Phone · [808.896.6715](tel:808.896.6715)

Email · sofiacooks@gmail.com

Website · www.sofiafunctionalhealth.com

From: [John Witeck](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] BLNR Meeting & Testimony on Pohakuloa
Date: Wednesday, May 7, 2025 1:56:41 PM

Dear Board members,

I urge you to reject the final impact statement re the Army's use—i. e. harmful & toxic misuse—of the land at Pohakuloa. The land should be demilitarized and restored for public use.

Sincerely, John Witeck, Honolulu, Hawaii

[Sent from Yahoo Mail for iPhone](#)

From: [Ian Withy-Berry](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa
Date: Wednesday, May 7, 2025 3:47:55 PM

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,
Ian Withy-Berry
Kailua

From: [Dayton Wright](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 2:12:03 PM

Pohakuloa Testimony

Aloha, I am Dayton, a 12-year-old student at Ka waihona o ka na'auao. I don't want the lease to be renewed for Pohakuloa or any other U.S. base on our 'Āina because we as Hawaiians were taught to Malama our 'Āina, not destroy it. The military took over half of our land. The Hawaiian people's land. Even though the military provides us protection, at what cost? Our land is being destroyed, and soon, once the whole island is destroyed, the military will probably move on to another island, causing even more problems. Even though I'm saying all this, I'm only twelve. Being twelve doesn't change that I can save our land and return it to who it once belonged to. The military knows that they're doing the wrong thing. If they were to stop, Hawaiians would be able to replenish their farms and go back to how things were before. In conclusion, I don't want the lease renewed for the U.S. military at Pohakuloa or any other base because of all of these reasons.

Aloha mai kākou Chair Case and Members of the Land Board,

My name is *Puuoneomakapuu Johnson*, a Native Hawaiian born and raised in Waimānalo, O‘ahu. As a mother, nurse, and lifelong advocate for the health and well-being of our ‘āina and our lāhui, I write to express my **strong and urgent opposition** to the acceptance of the Army’s Final Environmental Impact Statement (FEIS) for the lease renewal of lands at Pōhakuloa Training Area (agenda item D1).

Pōhakuloa is not just any land. It is **wahi pana**, sacred and storied, carrying the weight of generations of ancestral connection. As a Native Hawaiian, I view this land through the lens of kuleana—our collective and sacred responsibility to care for and protect what has been entrusted to us. That kuleana extends to our public officials, including this Board, who are constitutionally bound to **mālama ‘āina** as public land trustees.

The Army’s documented track record at Pōhakuloa—burning nearly 20,000 acres, failing to mitigate contamination, and disregarding cultural sites—has already demonstrated a gross inability to serve as a responsible steward. The presence and aerosolization of depleted uranium only compounds the environmental and health threats, putting people, ecosystems, and cultural integrity at risk.

It is unacceptable that this FEIS glosses over the long-term cumulative impacts to this sacred landscape. It is woefully inadequate in addressing the irreversible environmental degradation, cultural desecration, and spiritual trauma associated with ongoing military training in a conservation district. There is no meaningful plan for remediation, restoration, or even accountability.

As affirmed by the Hawai‘i Supreme Court in *Kahaulelio v. DLNR* (2019), your obligation as land trustees is proactive, not passive. To accept this EIS is to ignore your duty to our land, our future generations, and to the people who call Hawai‘i home. It is also to betray the trust placed in you to act with care and justice.

I respectfully urge the BLNR to reject the Army’s EIS. Return Pōhakuloa to the people. Begin the work of healing and restoration. Uphold the values of aloha ‘āina that define us—not just in words, but in action. Me ka ha‘aha‘a a me ka ‘oia‘i‘o,

Puuoneomakapuu Johnson
Waimānalo, O‘ahu

From: [Pualilia Paikuli](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on item D-1
Date: Wednesday, May 7, 2025 2:51:20 PM

May 7, 2025

RE: Testimony in rejection of Agenda Item D-1

Aloha my name is Pualilia Paikuli; resident, business owner, a Native Hawaiian of Hawai'i County, currently living in Kealahou, Hawai'i.

I respectfully submit this testimony, in **opposition** to Agenda Item D-1.

I ask that you **reject** the Army's FEIS for continued military use of Pohakuloa.

The FEIS disregards clear Hawai'i law, as pointed out by DLNR staff.

The Army has refused to consult with 'Aha Moku despite clear instructions from DLNR staff.

The FEIS ignores the repercussions of the ongoing bombing and desecration of Pohakuloa and the unique relationship between Native Hawaiians and the 'aina at Pohakuloa.

The 1993 Apology Resolution acknowledges this relationship, yet the FEIS fails to account for the harms to the health of our island and people caused by the previous six decades of bombing. The desecration and bombing/dropping of exploding ordinances on the land which sits in the upper piko of our Island, the saddle between Mauna Kea and Mauna Loa, where all fresh water is collected and feed into our aquifer, is repulsive. How can our people and Island be healthy after this practice has been allowed to continue for almost 70 years?

The Army admits they do not clean up and **has not** cleaned up exploded ordinances and toxins accumulated over the past six decades. This is absolutely unacceptable!

If this FEIS is accepted, it will set a very dangerous precedent in which future applicants may use this as an excuse to bypass proper environmental and cultural review.

I urge you to uphold your mission, the law, and the rights of the Hawaiian people and to reject the Final Environmental Impact Statement (Agenda Item D-1).

Mahalo,
Pualilia Paikuli
PO Box 4577
Kailua Kona, HI 96745
808-896-4390

From: [Jaylee Peterson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] testimony
Date: Wednesday, May 7, 2025 2:44:39 PM

Aloha, I am Jaylee, a 13-year-old student on Oahu. I DO NOT want the lease to be renewed for Pohakuloa or any other U.S base on our 'Aina because I see how the U.S. military people treat the island and don't even think about cleaning up after bombing. They're just leaving their things and bombing equipment around the 'Aina and not even thinking about picking up after themselves. They use half of Hawaii's land for useless things and don't even think about us, but themselves, and that's not even their land. I don't like that they treat our home like it is their own, and they own it, but it should be the opposite. They think they own everything of ours because no one was saying anything to them, but they sure do not. In closing, I DO NOT want the U.S to renew the lease.

-Mahalo

From: [suntzuwong](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa EIS
Date: Wednesday, May 7, 2025 2:38:50 PM

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,
Mike Wong
808 333 0122

Sent from [Proton Mail](#) for iOS