

From: [Emma Macey](#)
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 10:44:17 PM

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,

Emma Macey
Oahu, HI

From: [Julie Agno](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to Reject Pohakuloa EIS
Date: Wednesday, May 7, 2025 6:49:58 PM

Aloha BLNR board members,

I Julie Agno, as an individual resident of Hawaii Island, am strongly opposed to any further military occupation, bombing, improper management of feral undulates, lack of access to cultural and hunting lands for Hawaii Island Residents, and desecration of the land at Pohakuloa. I urge you to REJECT the Final EIS on Pohakuloa that is extremely deficient in a number of areas.

1. Pohakuloa is classified as a State Conservation District, the highest protected land status. Bombing, shelling and military pollution are not compatible land uses in a conservation district. The full extent of military destruction at Pohakuloa has not been thoroughly investigated.
2. The Final EIS inadequately addresses concerns for protection of endangered plant and animal species at Pohakuloa, and with the federal environmental budget cuts it appears protection of endangered species will be further limited in the future making conservation and land healing necessary.
3. The military cultural impacts and environmental assessments are superficial and insufficient. The US military has been bombing and shelling Pohakuloa for more than 80 years, and yet more than half of Pohakuloa hasn't had an assessment survey of cultural and historic sites. What they have surveyed and found have they disclosed or been forthcoming??
4. The increasing fire risk at PTA is inadequately addressed. Pohakuloa is a dry windy area in the center of Hawaii Island. The Final EIS says that military bombing and shelling has started 1261 wildfires at PTA since 1975. It also notes that prior to 2012 data is incomplete so the number of fires could actually be higher. The final EIS also says that the wildfire risk will only be increasing in the future due to more and more extremes of climate change. One fire started on PTA in 2022, a year before the Lahaina fire, burned more than 12,000 acres off the base destroying endangered species habitat.
5. The Army completely understates the quantity of Depleted Uranium (DU) weapons fired at PTA and the Hazards. The EIS states 400 DU spotting rounds for the Davy Crockett Nuclear weapon system. Army Hawaii Garrison Colonel Howard Killian testified before the Hawaii County Council in 2008, that based on the number of people certified to fire the Davy Crockett weapon system at PTA, TWO THOUSAND DU spotting rounds were fired at PTA. This is after years of denial by the Army that any DU was fired at PTA. It is likely that additional DU penetrating rounds were also fired at PTA. Col. Killian testified that DU was not prohibited from being used in training until 1996. DU has a half life of 4.5 Billion years and when DU metal is hit with high explosives it burns and turns into DU oxide particles that can be carried long distances in the wind. Dr. Lorrin Pang, MD, listed in the top 3% of America's best doctors, who spent 25 years in the Army medical corps has stated that inhaling DU oxide particles is the most deadly form of radiation. It can travel through the lymph system causing various cancers. It also causes birth defects and even genetic damage passed to future generations. Dr. Pang has said that Pohakuloa should be ringed 360 degrees with proper

air filters for a full year to really see what toxins are coming off the base.

7. DLNR Staff K. Tiger Mills of Office of Conservation and Coastal Lands notes in a letter dated April 30, 2025 (HA 25-173) additional information the Final EIS should address, including —

A. A response to the Hawaii County Council regarding Resolution 639-08 based upon comments our organization and others raised in the draft EIS process

B. Additional discussion on the rare environmental setting on the high-elevation sub-alpine tropical dryland ecosystem.

C. A complete inventory of archeological sites that have been or may be impacted by military training.

8. Comments by DLND staff Ryan Okano, Division of Aquatic Resources, April 29, 2025 about impacts to aquatic resources that need to be addressed.

9. PTA base commander LTC T. Alvarado has refused to participate in public town hall forums on Pohakuloa.

I submit this testimony in hopes that the board will take action to protect Pohakuloa and give this state conservation lands the protection and healing it deserves!

REJECT THE EIS!

Julie Agno

From: [James Akau](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1 - James Akau
Date: Wednesday, May 7, 2025 7:19:21 PM

Ke aloha nui Chair Chang and Members of the Board of Land and Natural Resources:

Eo mai nei, my name is James Akau from the historical plantation town of Pāhala in the majestic district of Kaʻū. I would like to take this opportunity to respectfully encourage you to reject the insufficient FEIS in Item D-1.

The public trust doctrine: Article XI, Section I of the Hawaiʻi Constitution (adopted in 1978) states that: "For the benefit of present and future generations, the State and its political subdivisions shall conserve and protect Hawaiʻi's natural beauty and all natural resources, including land, water, air, minerals, and energy sources, and shall promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of the self-sufficiency of the State. All public natural resources are held in trust by the State for the benefit of the people" (Sproat 2015, 739). 'Ōiwi kin, or relations: our lands, waters, trees, fish, etc. are legally defined as "public trusts."

The public trust doctrine, represented 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.

Additionally, Native Hawaiians have long borne a disproportionate burden in witnessing Pōhakuloa's sacred 'āina be bombed, poisoned, and desecrated - for generations. The US Congress itself, in the 1993 Apology Resolution, recognized the intrinsic and unique relationship between the well-being of the Hawaiian people and their connection to 'āina. Yet the FEIS fails to account for the deep psychological, spiritual, and physical harms that will continue to be borne by the Native Hawaiian community in particular, should their demands for justice, healing, and reconnection with ancestral (and illegally stolen) 'āina at Pōhakuloa be ignored for another 65 years or longer. Rejecting this incomplete and unlawful document ensures that the Army fully accounts for the harms it has and will continue to inflict with its "retention" proposal, including to the Native Hawaiian community.

Accordingly, I urge you to please uphold the law and your mission, and REJECT the FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

I leo mahalo nau nō

--

James J. Akau
Kahuku Ranch Kahu 'Āina/Caretaker
Kamehameha Schools
92-7405 Mamalahoa Hwy. Nā'ālehu, Hawaii 96772
(c) (808) 640-4792

‘A‘ohe ‘ulu e loa‘a i ka pōkole o ka lou

From: [Julia Akoteu](#)
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 7:59:37 PM

My name is Julia Akoteu, and I am writing from Hercules, California, 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 deep spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, igniting wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is deeply flawed and dishonest. It fails to acknowledge the full extent of environmental degradation, cultural harm, and decades of community opposition. It assumes future compliance without addressing the military's long history of neglect, environmental destruction, and disregard for both state law and county resolutions—like the one passed in 2008 calling for an end to live-fire training and cleanup of contamination.

The courts have already ruled that the State has failed in its duty to care for this land. Approving this EIS and renewing the lease without full accountability would be a betrayal of your trust responsibilities and would allow for the continued destruction of a sacred place that never should have been used for war training in the first place.

I respectfully urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range—it is sacred. It is time to protect and heal this 'āina, not enable its further destruction.

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

Mahalo for your time and consideration,

Julia Akoteu

Hercules, CA

From: [Val Amoguis](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, May 7, 2025 8:09:52 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,

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.

5. Threat to Water Resources and Public Health

Pōhakuloa sits atop the island's primary aquifer recharge zone. The mountain is a vital source of fresh water for Hawai'i Island, feeding streams and groundwater that sustain our ecosystems and communities. Pollution from military activities—including chemical contaminants and unexploded ordnance—poses a serious threat to this water supply. These toxins can seep into the soil and groundwater, putting the health of our people at risk. Despite this danger, the military has demonstrated a lack of accountability in cleaning up after its operations. On an island with limited resources, we cannot afford to compromise the purity of our most essential life source.

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,

75-177 Ala Onaona

Kailua-Kona HI 96740

Valen Amoguis
808-491-3244

amoguisval@gmail.com

From: [Shani Anderson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on FEIS for 5/9 meeting
Date: Wednesday, May 7, 2025 9:40:24 PM

Hello,

My name is Shani Anderson. I am a resident of Hawaii. I am writing to request that the BLNR reject the army's final environmental impact statement.

Thank you.

From: [Arriana Angela](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Stop The Desecration Of Pōhakuloa
Date: Wednesday, May 7, 2025 9:38:13 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

The State has a Constitutional Obligation to Mālama 'Āina:

As affirmed by the Hawai'i Supreme Court (*Kahaulelio v. DLNR*, 2019), “the State has ‘the highest duty to preserve and maintain the trust lands’ — a duty rooted in the constitutional obligation to *mālama 'āina*, to care for the land.” The Court emphasized that the State's trustee obligations exist even without proven lease violations, noting the duty is proactive and preventative.

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,
Arriana S.
Oahu

From: [Jacelyn Auna](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Oppose the FEIS
Date: Wednesday, May 7, 2025 7:15:05 PM

Aloha,

My name is Jacelyn Auna. I am a Kanaka maoli of Keaukaha Hawaiian Homestead on the Island of Hawai'i,

I strongly oppose the U.S. Military FEIS.

The State of Hawai'i has a duty to the indigenous people, the Native Hawaiian people of this Aina. A duty to protect and preserve the sacred lands of this Aina. A duty to include the indigenous people in all steps and in all discussion and consultation with the Environmental Impact Statement. A duty to be transparent with all those who is impacted the most, again which is the indigenous people, the Native Hawaiian.

STOP failing us!

REJECT the FEIS!!!

-Jacelyn Auna

From: [Hiilei Bacalso](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Agenda Item D-1
Date: Wednesday, May 7, 2025 9:36:54 PM

Aloha,

As a Hawaiian cultural practitioner, I urge the BLNR to reject Agenda Item D-1. The Army has not done its legal homework and continues to disrespect sacred ‘āina.

Mahalo,
Hiilei Bacalso

Sent from my iPhone

From: [Kalani Baer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, May 7, 2025 7:16:29 PM

I would like to testify via zoom.

Mahalo,
Kalani Baer

Written testimony:

I do not support the renewal of a lease to the US Army. This lease is harmful to the lāhui on so many levels. I live on Hawaii Island. I don't want my island to be a bombing playground for soldiers. Stop the harm. Stop destroying and hurting our aina and our Hawaiian people. Enough is enough. My grandparents, my kūpuna lived and were displaced through this hellish treatment and now I am here watching the same desecration. STOP
Shouldn't have to explain why bombing a place is not okay.

From: [Lauren Ballesteros](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 4:50:32 PM

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

My name is Lauren and I respectfully urge you to please do the right and necessary thing: **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. 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. Without the necessary 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.

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

Mahalo nui for the opportunity to testify!

Sincerely,
Lauren Ballesteros-Watanabe

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

Date: 05/07/25

Aloha Chair Chang and Members of the Board,

My name is Leimaile Barrett, and I am a member of **Hui Aloha ‘Āina o Honolulu**. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army’s proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen ‘āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this ‘āina.

The most egregious failures of the FEIS 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 'oia'i'o,

Leimaile Barrett
Kaimukī, O'ahu
Hui Aloha Aina o Honolulu

From: [Hoku Mama](#)
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 8:04:40 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 'oia'i'o,
Hokulani Beale
Moanalua, Oahu
Kanaka Oihi
Hokumama@aol.com
909 556 2274

Sent from my iPhone

From: [Sarah Begley](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] rejecting the army's EIS for pōhakuloa
Date: Wednesday, May 7, 2025 3:54:53 PM

to whom it may concern,

I am a Hawaiian and a resident of Maui and I hope you REJECT the army's final EIS for the Pōhakuloa Training Area. The army's EIS is not complete or adequate to address the many concerns listed. Please listen to the Hawaiian people and reject this EIS.

Sarah Begley

From: [Seifrah](#)
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 4:04:35 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Sarah Blichfeldt, 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.

Our land is way too valuable to be bombing practice. It is home to native endangered species that cannot be found anywhere else in the world. By destroying their habitats, we destroy their chances of survival, and with it an understanding of our land, life, and the environmental history of the land as well. Too many native species and wahi pana have already been lost. These unique species and places are what determine hawaii's identity and distinction from Polynesia and the rest of the world. These are not disposable resources.

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

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

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

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

Mahalo for your time and consideration,
Sarah Blichfeldt
Maunaloa, O'ahu

From: [Boisvert-Jorgensen](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 6:33:58 PM

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

Please reject the FEIS!
Rejecting it will uphold your public trust obligations as well as our bedrock environmental law.

Mahalo,
Denise Boisvert
Honolulu

From: [tbh](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1: Please OPPOSE Pohakuloa FEIS
Date: Wednesday, May 7, 2025 9:03:14 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.

Other testimonies will make clear that the FEIS is inadequate and should be rejected on several grounds, including the following:

- * 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 FEIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina

But my personal primary objections are as follows:

The FEIS does not include remedies for past cumulative environmental/physical, economic, cultural, spiritual, and psychological damages already inflicted by the U.S. Army's misuse of this land over the entire length of the current lease.

The FEIS should include requirements that the Army mitigate these damages, at least environmentally and economically.

In addition to full remediation of all physical environmental damage, the Army should also be required to provide the following financial compensation:

- Payment of fair market rent retroactive to the start of the current 65-year lease, plus interest.

This retroactive revenue should first be used to compensate the estates of beneficiaries of the 1920 Hawaiian Homes Commission Act who have died on the Department of Hawaiian Homelands homestead wait list, followed by beneficiaries still on the wait list.

This retroactive revenue should then be used to compensate the Office of Hawaiian Affairs for all past under-payments of ceded lands revenue dating back to 1978

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.

Ownership of these lands should then be returned to Native Hawaiian ownership, in a

form and manner to be determined by Native Hawaiians.

Sincerely,

Thomas Brandt
Honolulu

7 May, 2025

Aloha Board of Land and Natural Resources Board Members,

I strongly oppose the United States Army's proposed retention of leased lands at Pōhakuloa Training Area, and I strongly urge the BLNR to reject the Army's EIS.

The continued desecration of Pōhakuloa, an area rich with history, culture, and environmental significance is unacceptable and should not be allowed to further continue. How can the ongoing use of live-fire and bombing in impact areas not contaminate the environment? In what world would this be considered safe for life, whether that of plants, animals, land, and water? When has the United States Army *ever* acted as a pono steward of 'āina, kai, ea, a me ka po'e o Hawai'i or elsewhere in the world, for that matter? The U.S. 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.

Ua hewa. Ua lawa. The U.S. Army is not welcome to continue ravaging and desecrating Hawai'i; it never was. It is well past the time to demilitarize Hawai'i, and **the BLNR has the responsibility to do what is right and protect Hawai'i's land and natural resources. As such, I urge the BLNR to oppose the US Army's retention of leased lands and to reject the Army's FEIS for Pōhakuloa.**

Sincerely,

'Iolani Brosio

From: [Kasie Bullock](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] pōhakuloa testimony
Date: Wednesday, May 7, 2025 8:45:19 PM

i am sending this email today to show my opposition in the united states army retaining the land at pōhakuloa, hawai‘i. i am advocating for all whom may be reading this to reject the united states army environmental impact statement.

in their eis they state they want to retain infrastructure investments; while having an existing contract ending august 16, 2029 it is irresponsible of the united states military to put such investments in an area that is soon to expire or it is manipulative of the united states government to use it as grounding to renew their contract. in their eis they state “to allow for future modernization.” according to link 1 Army modernization will be driven by technology and data. according to link 2 The U.S. will spend trillions of dollars building infrastructure to develop technologies needed to succeed on battlefields. The men and women of future wars will be inside a secured facility using computers to employ munitions on hostile targets. Soldiers will employ autonomous weapons, some with lasers, which utilize Artificial Intelligence (AI) to execute targets according to mission plans. link 3 which is the army data plan states: With the fires growing in range and automation and forces increasingly dispersed on the battlefield, speed of decision to neutralize critical targets can have rapid cascading effects to allow our forces to penetrate, disintegrate, and then exploit in order to win. Integration and speed of information is achieved through data and data analytics.

the statement of “to allow for future modernization” is a war threat by the army’s own sources and definition.

the eis also states “to maximize use of the impact area”

there are three types of impact areas, temporary, dedicated, and high-hazard.

it would be manipulative to use a temporary impact area as grounding to renew a contract given the understanding of its expiration. if it is either dedicated or high-hazard, it strictly goes against the core foundation of the hawaiian culture and ethics for the debris associated with live-fire and projectiles that have been historically and consistently neglected from any clean up initiatives by the united states government and/or military; poisoning everyone around them with intentional contaminants.

the united states military has caused repeated harm to the people and land. from soil contamination, threats to the water table, destruction of native ecosystems, releasing of toxic and hazardous elements; such as beryllium, aluminum, arsenic, and uranium to name a few.

threats to the water table is a threat to the life, liberty, and the pursuit of happiness, and prosperity of every single living organism that relies upon such sources; including humans, aquatic species, aves species, reptiles, amphibians, down to micro-organisms of fungi and bacteria-we are all extremely negatively impacted by, including but not limited to death.

using live-fire and projectiles grossly neglects any and all levels of protection for all endangered species that is both federally and state enforced thru various laws.

i am asking you to reject the united states army proposal to renew their contract in pōhakuloa, hawai‘i as a means to protect, preserve, and conserve the natural land for today, tomorrow, and for our future generations that we will depend upon.

link 1: https://www.army.mil/article-amp/280353/sustaining_and_maintaining_the_armys_modernization_efforts

link 2: <https://www.armyupress.army.mil/Journals/NCO-Journal/Archives/2023/July/Future-Weapons-Technology-of-2040/>

link 3: https://www.army.mil/e2/downloads/rv7/about/2022_army_data_plan.pdf

From: [Kalae Calderon](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] OPPOSITION
Date: Wednesday, May 7, 2025 5:02:43 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,
Kalae Calderon

From: [Tori Campbell](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] testimony
Date: Wednesday, May 7, 2025 8:55:49 PM

Aloha,

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

I say this because

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

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

Mahalo,

Tori Campbell

From: [Rebecca Canright](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please safeguard our scenic lands.
Date: Wednesday, May 7, 2025 3:55:33 PM

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

As a young person, I care deeply about protecting our natural resources. I respectfully urge you to do the right thing, and reject the 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.

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

Mahalo nui for the opportunity to testify.

Warmly,

Rebecca

Frigate birds fly for months over the ocean and can engage in both regular sleep and use half their brain at a time to sleep during soaring or gliding flight.



Compassion for all creatures great and small.

From: [Clementine Chamberlain](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in opposition to the approval of the Army's FEIS, Meeting Item D-1, 5-9-25
Date: Wednesday, May 7, 2025 7:46:25 PM

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

My name is Clementine Chamberlain. I reside in Leahi, Oahu, and I am writing to express my strong opposition to the approval of the Army's Final Environmental Impact Statement (FEIS) for the Pōhakuloa Training Area (PTA).

Pōhakuloa is not just any place—it is a wahi pana and wahi kūpuna, a sacred, ancestral place. It is home to irreplaceable Native Hawaiian cultural sites and some of Hawaii's most endangered species. The Army has already admitted to widespread contamination, not just in Pōhakuloa, but anywhere they have touched in Hawai'i. Similarly, the Army cannot prove that this contamination has not spread into water or ecosystems—the army gatekeeps this information, as well as any safety procedures or spill data. They also delete critical information from their FEIS and other public access record(s). Fires, endangered species, and climate harms have been dismissed without evidence, and the FEIS they have submitted evades Hawaii law by ignoring very obvious cumulative impacts.

The approval of this FEIS does not reflect the will of Native Hawaiians, the traditional caretakers of this land, and does not reflect your constitutional responsibility to the public trust of the water that feeds and provides for Hawai'i. In *Kahaulelio v. DLNR* in 2019, the state of Hawaii has already been proven to breach its constitutional trust duty by failing to reasonably monitor and inspect trust lands at Pōhakuloa leased to the US military, failing to ensure compliance with cleanup and safety provision, failing to take action after learning of possible contamination, and failing to document efforts and provide transparency to the public. Ultimately, the potential approval of this FEIS does not reflect what is pono.

In today's political climate, where science is being dismissed daily, where federal dollars are being pulled based on wrongful agendas, and where the very idea of 'āina protections are being booted daily, I urge you to be on the right side of history. It is unacceptable and wrong that anyone gets to flit around laws and regulations that were created to protect our 'āina. These safeguards exist for a reason. Demand the Army clean up their mess, and rightfully restore the land to its natural state to begin a much-needed process of healing and restoration.

Thank you for considering my testimony in your final decision, and allowing me to use my voice on this important matter.

Ke aloha 'āina,
Clementine Chamberlain

From: [Lehuanani chang](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] reject army's eis
Date: Wednesday, May 7, 2025 8:02:24 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

Ke aloha mau,
Lisa Lehuanani Chang

From: [Jacqueline Nunez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda item D-1
Date: Wednesday, May 7, 2025 9:05:00 PM

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

My name is Jacqueline Chico 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,
Jacqueline Chico*

From: [Aidan Chun](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 6:19:45 PM

Aloha Chair Chang and Members of the Board,

My name is Aidan Chun. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

The most egregious failures of the FEIS 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 'oia'i'o,
Aidan Kukunaokala Chun
Honolulu, 'O'ahu

From: [Shayna Cohen](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa - No Action Alternative Testimony
Date: Wednesday, May 7, 2025 8:46:29 PM

Dear Land Board Members:

In response to the Army's EIS, concerning retention of the leased lands at Pōhakuloa, I am writing to express support for Alternative E.S.8.4, No Action Alternative, with some changes. Because the Army's lack of demonstrated ability or will to be a good steward of the land, I support ceasing or severely limiting training activities in the area. The use of live-fire and bombing raises concerns about environmental contamination, safety, and long-term degradation of the land and water. Reasonable access to government-owned utilities can be allowed, and cultural stewardship should be transferred over to indigenous and environmental leaders.

The renewal of the lease and approval of the EIS conflicts with the BLNR's constitutional duty to mālama 'āina.

Thank you for thinking of the health of us all. Be well,

Shayna Cohen

Hilo, Hawaii

Shayna Cohen
shaynarosecohen@gmail.com

From: [Sean Connelly](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: Stop the Desecration of Pōhakuloa
Date: Wednesday, May 7, 2025 9:11:39 PM

Testimony of Sean Connelly

Artist & Building Practitioner

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

RE: Opposition to the U.S. Army's Final EIS for Pōhakuloa Training Area

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

My name is **Sean Connelly**. I am an artist and building practitioner from O'ahu currently based in Hawai'i and New York, and I write to register my unequivocal **opposition** to the U.S. Army's Final Environmental Impact Statement (FEIS) and its proposal to retain 23,000 acres of leased lands at the Pōhakuloa Training Area. My work centers on **justice-advancing architecture** and **Indigenous land restoration**, and I come before you not only as someone who designs physical spaces, but as someone with an expertise in the study and witness of the **ongoing harm** militarized landscapes inflict upon Hawai'i.

I am compelled to testify not only as a Hawai'i resident, but because the continued threat of bombing inflicts upon me profound emotional, psychological, and cultural harm that directly endangers my well-being and violates my right to feel secure in my homeland.

Pōhakuloa is Today's Kaho'olawe

We must confront the **repetition of history**. For nearly 50 years, Kaho'olawe was used as a bombing range, leaving behind fractured caprock, contaminated soils, unexploded ordnance, lost groundwater, and cultural scars still healing to this day. It took generations of resistance—from prominent cultural leaders to everyday caretakers—to finally stop that bombing. Yet now, in 2025, the same pattern looms at Pōhakuloa.

Today, Pōhakuloa harbors endangered species, storied landscapes, and sacred cultural sites. And yet, nearly 20,000 acres have already burned as a result of military activity. **Depleted uranium** is in the soil, at risk of becoming airborne with every detonation, threatening our land, water, and people in ways that are **immediate and compounding**. The FEIS fails to address these grave realities. It offers no **adequate biological or cultural surveys**, no comprehensive plan to prevent further contamination, and no consideration for alternative public uses of this land. Even more troubling, the Department of Land and Natural Resources' **own staff** have cited the Army's repeated **refusal** to engage with or respond to critical issues raised throughout this review process.

Why the FEIS Must Be Rejected

1. **Inadequate Environmental and Cultural Impact Analysis**
2. **No Meaningful Mitigation** for critical ecosystems and sacred sites
3. **Ongoing Depleted Uranium Contamination** left unaddressed

4. Violation of Conservation District Protections

5. Breach of the State's Constitutional Duty to mālama 'āina, as affirmed in *Kahaulelio v. DLNR* (2019)

There is a Better Future—Rooted in 'Āina

As a senior author of the 2024 research article '**Āina as Resilience**, published in *Frontiers in Sustainability*, I have worked alongside over **50 community-based organizations** across Hawai'i—part of a growing movement of '**Āina Organizations** dedicated to restoring land and water for the benefit of us all. They map out a **resilience economy** driven by **reciprocal relationships** with the land, one that yields food security, cultural revitalization, and healing. Their work proves we do **not** have to accept militarization as our economy's cornerstone. When we nurture 'āina, 'āina nurtures us in return.

The Army has had decades to show it can operate under these stewardship values—and it has failed. The time has come to **end the lease** so the land can begin to **heal**.

Urgent Call to Action

I urge this Board to **reject the Army's FEIS**, to stand by the findings of your staff, and to uphold your constitutional responsibility to protect Hawai'i's lands and people. **Do not repeat the mistakes of Kaho'olawe**. This is the moment to restore truth, kuleana, and reverence for the land—so that generations from now, our children inherit a Hawai'i defined not by bombing ranges, but by the profound resilience of **aloha 'āina**.

Mahalo for your time and consideration.

Respectfully,

Sean Connelly
Artist & Building Practitioner
Hawai'i / New York

Formal Statement Opposing the Pōhakuloa Training Area Lease Renewal

To: Hawai‘i Board of Land and Natural Resources (and relevant State/Federal Officials)

Subject: Opposition to Renewal of Lease for Pohakuloa Training Area (PTA) Firing Range, Hawai‘i Island

Dear Honorable Board Members and Decision-Makers,

I write to formally **oppose the renewal of the U.S. Army’s lease for the Pōhakuloa Training Area (PTA) Firing Range** on Hawai‘i Island. This opposition is grounded in serious environmental and public health concerns, as well as profound political and historical issues. **For the reasons detailed below – including documented depleted uranium contamination, conflicts of interest in the Army’s health risk assessment, the U.S. military’s destructive environmental legacy in Hawai‘i, and the unresolved injustice of Hawai‘i’s sovereignty – I urge you to deny the lease renewal.** Instead, the PTA lands should be returned for remediation, conservation, and Native Hawaiian stewardship.

Environmental and Health Risks at Pōhakuloa

Pōhakuloa Training Area is the largest live-fire range in Hawai‘i, encompassing nearly 23,000 acres of state land between Mauna Kea, Mauna Loa, and Hualālai. These public lands have been leased to the Army since 1964 for a nominal fee of **\$1 for 65 years**. Decades of intensive military use have left a legacy of unexploded ordnance, **wildfires**, and most alarmingly **radiological contamination from depleted uranium (DU)**.

In 2006, the Army confirmed the presence of DU in PTA’s impact area – specifically from **Davy Crockett** nuclear weapon training rounds used in the 1960s. The Army’s own **Baseline Human Health Risk Assessment (BHHRA)**, completed in June 2010 by a contractor (Cabrera Services), identified **714 depleted uranium spotting rounds** dispersed on the PTA. That assessment evaluated potential radiation dose and chemical toxicity risks from DU in the soil. It considered multiple exposure pathways – including

incidental ingestion of DU-contaminated soil, inhalation of DU dust, skin contact, and direct gamma radiation exposure – across various scenarios (maintenance workers, construction workers, cultural site monitors or visitors, soldiers, and even hypothetical subsistence farmers at the boundary).

The 2010 BHHRA concluded that the DU present at PTA posed no immediate health danger: estimated radiation doses and chemical hazard indices were orders of magnitude below U.S. Environmental Protection Agency (EPA) safety thresholds. For example, the worst-case lifetime cancer risk for a soldier was calculated at $\sim 4 \times 10^{-9}$ (far below the EPA's 1×10^{-6} level of concern), and the highest hazard index for chemical toxicity was $\sim 2 \times 10^{-5}$ (far below the benchmark of 1). In plain language, the Army asserted that **“no adverse human health impacts are likely to occur as a result of exposure to [depleted] uranium present in the soil at PTA.”**

However, **this rosy conclusion is undermined by significant uncertainties and limitations** in the study's data and methodology. ****First**, the BHHRA was not based on comprehensive new sampling of the PTA environment, but largely on **limited prior sample data and modeling assumptions**. In fact, only a small number of DU fragments were ever recovered during initial surveys, providing an incomplete picture of the contamination's extent. The “714 rounds” figure itself was an estimate derived from archival records and models, not a physical accounting. ****Second**, the assessment made **optimistic exposure assumptions** – for instance, that access to the impact area is tightly controlled, exposure durations would be short, and that no one resides on or very near the PTA (apart from occasional cultural practitioners or trespassers). These assumptions may not hold in all cases (e.g. hunters or hikers have been known to stray near training areas), and they could underestimate risk if conditions change (such as more frequent training or unauthorized access). Notably, even as the Army publicly downplayed the risks, it required anyone granted access to PTA's ranges to sign waivers explicitly **acknowledging that “the entire reservation is dangerous and unsafe” due to the presence of unexploded ordnance and DU, and that DU particles could be inhaled or ingested causing health effects**. This contradiction casts doubt on the Army's assurances of safety.

****Most importantly, the BHHRA entirely excluded certain exposure pathways due to lack of data – especially groundwater contamination.** The 2010 study stated: *“Currently, there is no information to show that either groundwater or surface water near the site may have been affected by historical activities at PTA. Additionally, the size of the DU fragments and the depth of groundwater is sufficiently deep so as to preclude migration; therefore, these media are excluded from further evaluation in the BHHRA.”* In other words, because the Army **had not studied** whether DU was leaching into water, it assumed it was not a problem. This assumption is highly questionable. At the time, it was believed that the **water table lay over 300 meters (1000 feet) below the surface** at PTA. Yet subsequent independent hydrological research in the Saddle Road area found perched aquifers and groundwater **much shallower than expected – in one case, only ~500 feet deep**. The Army itself is now drilling wells in the area to tap water for PTA, proving that groundwater is both accessible and “plentiful” under the training area. Thus, **the absence of DU in groundwater was never demonstrated – it was merely assumed**. No comprehensive well testing for uranium has ever been conducted in and around PTA, leaving the community without assurances that their future water resources are safe. This glaring gap underscores the **incomplete and potentially misleading nature of the Army’s risk assessment**. A credible study would have investigated whether decades of live-fire (including high-explosive detonations) might have helped mobilize DU particles through soil toward subsurface water, instead of simply declaring the risk “precluded” with no data.

In summary, **while the Army’s contractor report portrayed DU at PTA as a non-issue, its conclusions rest on sparse data and convenient assumptions** (e.g. limited sampling, optimistic exposure scenarios, and ignoring groundwater pathways). A **more precautionary and scientifically robust approach** is needed to truly assess the contamination. Until an independent, thorough study is done, **significant uncertainty remains about the long-term health risks of the DU left in PTA’s soil and the environment**. It is unacceptable to simply trust the Army’s self-interested assessment when the stakes – the health of Hawai‘i’s people and ecology – are so high.

Conflict of Interest in the Army's Assessment & Need for Independent Review

The **credibility of the 2010 BHHRA is further compromised by the circumstances of its preparation.** It was *commissioned by the U.S. Army and prepared by a private consulting firm (Cabrera Services, Inc.),* under contract to the Army's Joint Munitions Command. This represents a **clear conflict of interest:** the entity responsible for the pollution (the Army) paid for the study that concluded the pollution was harmless. No matter how professional the contractor, the **incentive is strong to produce conclusions favorable to the client's interests** – in this case, minimizing liability and clearing the way for continued live-fire training. Indeed, the Army immediately used Cabrera's report to assure the public that DU at PTA *"pose[s] no threat"* and that "no likely adverse impacts" will affect anyone on or near PTA. Such pronouncements, coming from a paid Army public relations release, cannot substitute for truly independent science.

In contrast, the **appropriate agency to evaluate health hazards like DU objectively is the federal Agency for Toxic Substances and Disease Registry (ATSDR).** ATSDR is a public health agency under the U.S. Department of Health and Human Services, created by Congress to provide independent expertise on environmental health threats (as part of the Superfund law). Its mission is to **"protect communities from harmful health effects related to exposure to hazardous substances"** and to *"serve the public through responsive public health actions to promote healthy and safe environments and prevent harmful exposures."* Unlike a defense contractor, ATSDR has **no stake in military operations.** It works in the public interest, alongside state and local health officials, to assess toxic exposures and recommend interventions. ATSDR has investigated contaminants at numerous military sites around the country, often providing community members with more transparent and health-focused reviews than those of the polluting agency.

Regrettably, ATSDR has not yet conducted an independent health assessment at PTA. The State of Hawai'i should formally invite ATSDR (or a similarly independent expert body) to review the site.

An **unbiased investigation** would likely address the deficiencies of the Army's study – for example, by examining the full extent of DU distribution (through comprehensive soil sampling and mapping), testing nearby ground and surface water for any trace of uranium, and evaluating long-term exposure risks to downwind/downstream communities under various scenarios (such as wildfires stirring up DU-laden dust, or expanded public access if the land is ever returned). Without such independent scrutiny, **allowing the Army to continue high-intensity use of the land would be irresponsible**. We cannot simply “take the Army's word for it” that everything is safe, when that Army has a vested interest in minimizing the appearance of risk.

Broader U.S. Military Environmental Harm in Hawai‘i

This lease renewal decision does not occur in a vacuum. It comes after **a long history of U.S. military activities causing environmental damage in Hawai‘i**, often with disastrous consequences for the land and people. This broader context raises serious doubts about any promises of stewardship or safety that accompany the Army's request, and it highlights the need for heightened scrutiny and precaution.

- **Kaho‘olawe – a Cautionary Tale:** The island of Kaho‘olawe, sacred to Native Hawaiians, was seized by the U.S. Navy during World War II and used as a live-fire bombing range for decades. From the 1940s through the 1980s, the military pounded the island with **hundreds of thousands of pounds of ordnance**, including everything from naval shelling to aerial bombing. The result was **near-total devastation of the island's ecosystem**. When Kaho‘olawe was finally returned to the State of Hawai‘i in 1994 after years of protest, it was **littered with unexploded bombs**. The Navy's partial cleanup removed or destroyed over **28,000 pieces of unexploded ordnance**, yet **roughly 25% of Kaho‘olawe remains contaminated and off-limits** because it is still too dangerous. The island's topsoil was pulverized or eroded; invasive species and erosion now choke the landscape where native forests once stood. Even after two decades of restoration efforts, large swaths of the island are barren hardpan where nothing will grow. Kaho‘olawe stands as a stark warning: **military “stewardship” of Hawaiian lands has often led to long-lasting if not**

permanent damage, and cleanup efforts, even when well-funded, can never fully restore what was lost.

- **O‘ahu’s Red Hill Water Disaster:** In recent years, Hawai‘i witnessed one of its worst environmental crises as a direct result of military negligence. At the Navy’s **Red Hill Bulk Fuel Storage Facility** on O‘ahu – a massive underground fuel tank farm built in the 1940s above a critical aquifer – **jet fuel leaked into the island’s drinking water supply**. In May 2021, a pipeline error caused ~20,000 gallons of fuel to burst from the aging tanks; the fuel seeped unseen into the ground for months. By November 2021, residents in and around Joint Base Pearl Harbor–Hickam discovered their tap water was foul-smelling and oily – laced with petroleum. **Thousands of men, women, and children suffered rashes, hair loss, vomiting, and other symptoms from the contaminated water**. The Navy at first insisted the water was safe, even as local health authorities warned families not to drink it. Ultimately the truth could not be denied: tests found **alarming levels of diesel and gasoline in the water** (140,000 ppb of diesel-range hydrocarbons, where 400 ppb is the safe limit). Over **4,000 military and civilian families had to be evacuated** from their homes to hotels, and a major groundwater aquifer that serves urban Honolulu was poisoned. This catastrophe was *entirely preventable*: the Navy knew for years that the WWII-era Red Hill tanks were corroding and leaking (a **27,000-gallon leak had occurred in 2014**, and many smaller leaks before and after), but repeatedly downplayed the risk and resisted calls to upgrade or remove the facility. The Red Hill crisis has severely eroded public trust in the military’s assurances. It demonstrated in painful fashion that **when the military tells Hawaiians not to worry, that everything is under control, the reality can be the opposite**. Environmental safeguards were neglected until disaster struck. The lesson for Pōhakuloa is clear: **we must not wait for a calamity (such as a DU exposure incident or a wildfire-driven dispersal of radioactive dust) to finally force action**. Proactive prevention and precaution are the only wise course.

- **Other Examples – Makua and Beyond:** Numerous other instances underscore this pattern. At **Mākua Valley** on O‘ahu, years of Army live-fire training ignited wildfires that

destroyed native forests and archaeological sites, and left behind unexploded munitions that have prevented Native Hawaiians from accessing sacred sites. At **Pearl Harbor**, decades of military-industrial activity left the harbor sediments so contaminated with heavy metals and PCBs that fish are unsafe to eat. Even at PTA itself, repeated training exercises have ignited large brushfires on the adjacent mountainsides, damaging habitat for endangered species. From the mountains to the ocean, **the U.S. military footprint in Hawai‘i has often resulted in toxic pollution, ecosystem degradation, and risks to public safety.** This track record cannot be ignored when evaluating whether to extend the Army’s use of yet more Hawaiian land.

In light of this history, the **Army’s promises to be a responsible steward at Pōhakuloa carry little weight.** The community has heard similar assurances before – that bombing would not harm an island, or that fuel tanks were safe – only to be faced with the devastating consequences later. **Issuing a new lease to continue high-impact training at PTA, especially for decades longer, would dangerously repeat the mistakes of the past.** It would also send a message that Hawai‘i’s lands can continue to be treated as expendable war-playgrounds rather than cherished ‘āina (land) to be protected.

Political and Cultural Context: Sovereignty and Justice for Hawai‘i

Beyond the environmental and health factors, the decision on PTA’s lease is intertwined with issues of **political justice and the rights of Native Hawaiians.** The very presence of the U.S. military in Hawai‘i – and its control of vast lands – is rooted in an **illegal overthrow and occupation** that has never been fully addressed. In **1893, the independent Hawaiian Kingdom was overthrown with the involvement of U.S. diplomatic and military agents**, against the will of Queen Lili‘uokalani and her people. President Grover Cleveland himself acknowledged that this regime change was an **“act of war”** committed by the United States, **“an invasion... by the use of armed forces”** resulting in the overthrow of a friendly government. The Hawaiian Kingdom was annexed by the United States without a referendum, and Native Hawaiians **“never directly relinquished their claims to their inherent sovereignty... or over their national lands to the United States.”** This quote from the U.S. Congress’s 1993 Apology Resolution is not

just rhetoric – it is a statement of historical fact that Native Hawaiians **did not consent** to the loss of their nation or lands.

The lands at Pōhakuloa are part of the so-called “**ceded lands**” – the roughly 1.8 million acres of former Hawaiian crown and government lands taken by the Republic of Hawai‘i and later ceded to the U.S. at annexation. Upon statehood in 1959, these lands were entrusted to the State of Hawai‘i to be held in public trust for, among other purposes, “the betterment of the conditions of Native Hawaiians.” To lease thousands of acres of such land to the U.S. Army (essentially for free, at \$1) so that it can be bombed and polluted is a profound betrayal of that trust. **It is a cruel irony that Native Hawaiians are expected to accept the continued desecration of their ancestral lands by the very government that took those lands illegally**, all in the name of “national defense” for a nation that was built on denying Hawaiian self-determination.

We must also consider that **Native Hawaiians today lack any federal recognition or formal voice in this process**. Unlike hundreds of Native American tribes and Alaska Natives, **Native Hawaiians are not recognized as having a sovereign government-to-government relationship with the United States**. There is no Native Hawaiian tribal government that the federal or state authorities are required to consult regarding military use of Hawaiian lands. This absence of political status – itself a consequence of the overthrow – means that the Native Hawaiian community often finds itself marginalized in decisions about its own land. **Proceeding with the lease renewal without addressing this representational disparity would continue the pattern of Indigenous disenfranchisement**. However, Native Hawaiians have not been silent: many have spoken out through public comments, lawsuits, and activism to oppose the misuse of their lands. As an example, the Hawai‘i County Council (Big Island) in 2008 overwhelmingly passed a resolution calling for a halt to live-fire training at PTA until the DU contamination is cleaned up. That resolution also urged a range of safety measures and better oversight – yet, to date, **the Army has taken none of the actions the local community requested**. This demonstrates the **disconnect between the military’s agenda and the will of Hawai‘i’s people**.

Culturally, the area of Pōhakuloa is part of the sacred landscape of the island. It lies between Mauna Kea and Mauna Loa, mountains revered in Hawaiian tradition. Scattered across PTA are numerous **Native Hawaiian cultural sites, shrines, and ancient trails** – tangible reminders that this land was actively used and cared for by Hawaiians for generations, long before it became a training ground. Every explosion and stray bullet risks damaging irreplaceable archaeological and cultural resources. Many Native Hawaiians see the ongoing bombing of Pōhakuloa as a **desecration of their ancestors' land**, compounding the trauma of the Kingdom's overthrow.

In the broader context of reconciliation and justice, **returning Pōhakuloa to the Hawaiian people would be a meaningful step**. The U.S. Congress in 1993 apologized for the illegal overthrow and pledged to support reconciliation efforts. Taking concrete action now – by refusing to extend the military's lease and instead prioritizing healing of the land and restoration of Hawaiian stewardship – is an opportunity to honor that pledge. Conversely, granting yet another long-term lease (the Army is seeking a 30-year extension past 2029) would effectively extend the desecration and military occupation at Pōhakuloa for another generation, delaying justice even further.

Conclusion and Appeal

In conclusion, **I urge you in the strongest terms to deny the lease renewal for Pōhakuloa Training Area** and to begin the process of environmental restoration and return of these lands to their rightful stewards. This recommendation is based on a clear record of facts and principles:

- **The environmental and health risks at PTA are real and insufficiently understood.** The Army's own reports acknowledge the presence of toxic **depleted uranium** on site, yet their assessment was based on limited data and convenient assumptions that downplay potential dangers (notably ignoring groundwater pathways and long-term exposure uncertainties). We cannot gamble with the health of Hawai'i's people, water, and 'āina based on one contractor's optimistic conclusion – especially when that contractor worked for the Army and not the community.

- **There is a glaring conflict of interest in relying on the Army's self-assessment.** An independent review by ATSDR or a similar body is needed to truly evaluate PTA's health hazards. Until that happens and proves the area completely safe (which is doubtful given the unanswered questions), the prudent course is to halt activities that could exacerbate contamination and to refuse prolonging the Army's tenure.

- **The U.S. military's track record in Hawai'i counsels extreme caution.** From Kaho'olawe's craters and unexploded bombs to the poisoned aquifer of Red Hill, Hawai'i has too often suffered when military promises of safety proved hollow. The state and its people have paid dearly for these mistakes. You now have the chance to avoid another such scenario by preventing further damage at PTA before it's too late.

- **Fundamental justice for Native Hawaiians requires a change in course.** Pōhakuloa is Hawaiian land, taken without consent. Native Hawaiians have never ceded their sovereignty or their love for this 'āina. Continuing to let it be bombarded and contaminated is incompatible with Hawai'i's values of **aloha 'āina (love and respect for the land)** and the state's trust obligations to its Indigenous people. Instead, returning the land and cleaning it up would be a step toward reconciling past wrongs and empowering Native Hawaiian stewardship. As long as PTA remains under lease for live-fire training, the injustices of the overthrow and occupation are literally etched into the landscape with every explosion.

Therefore, I respectfully call upon the Board and all relevant authorities to reject the Army's lease renewal request. The current lease, set to expire in 2029, should be the last. Planning should begin now for a responsible transition: **the U.S. Army must be held to its obligation to remediate the DU and any other contamination it caused**, remove unexploded ordnance to the maximum extent feasible, and restore the terrain as much as possible. The end of the lease would not mean the end of responsibility – rather, it would mark the beginning of a new chapter in which this land is **rehabilitated and conserved for future generations**. Imagine PTA transformed from a conflict zone into a pu'uhonua

(sanctuary) – a place of native dryland forest restoration, cultural practice, and education about the fragile ecology of Hawai‘i’s highlands. This vision cannot take root until the destructive training activities cease.

Finally, denying the lease renewal will send a powerful message of **respect for Native Hawaiian rights and sovereignty**. It tells the world that Hawai‘i values its people and environment over continued militarization. It shows that we are willing to repair past harms rather than perpetuate them. In practical terms, it could also save the State of Hawai‘i from future liability and expense – for if another environmental disaster were to occur under an extended lease, the State (as landowner) and the public would inevitably bear many of the costs.

In summary, extending the PTA lease is high-risk, unjust, and unnecessary. The U.S. military can meet its training needs elsewhere (or by modernizing tactics to be less land-intensive), but the people of Hawai‘i have only one ‘āina. We must protect it. I urge you to choose the path of **aloha ‘āina and justice** by saying no to the lease renewal and yes to healing the land and righting historical wrongs.

Mahalo for your careful consideration of this testimony. The community is watching this process with hope that our voices will be heard. **For the sake of Hawai‘i’s environmental integrity, public health, and the rights of its indigenous people, please deny the Pohakuloa lease extension and begin the work of restoration now.**

Respectfully,

Anthony Russell deJetley

Part-Native Hawaiian and U.S. Veteran

From: [Kiyomi Deschamps](#)
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 8:09:22 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Kiyomi Deschamps, 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,
Kiyomi Deschamps
Oakland, California

Aloha Members of the Board of Land and Natural Resources,

My name is Liz Doyle of Hanalei Kaua'i, 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.

My fellow community members and inter-island community don't need to recite why this opposition is so strong. The details you must be already aware of. This is an opportunity to do right by the violating terms of the original \$1 lease granted in 1964. The time has come to end by desecrating the land, bombing, contaminating it with depleted uranium, wild fires, etc.

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.

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 negligence.

Mahalo for your time and consideration,
Elizabeth Doyle
Hanalei, Kaua'i

From: [Joell Edwards](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Agenda item D1
Date: Wednesday, May 7, 2025 8:23:50 PM

Aloha Land Board Members,

My name is Joëll Edwards and I'm writing to you from Wainiha, Kaua'i, where I live, work, and have the honor of being part of this community. I own a small country market here that's built on aloha 'āina — we source locally, we support our community, and we try every day to live in a way that honors this place.

I am writing to express my deep and personal opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area. I urge you, with everything in me, to reject the Army's Final Environmental Impact Statement (FEIS) and take a stand for the future of Hawai'i.

Pōhakuloa is not just land. It is sacred ground — a living, breathing wahi pana filled with stories, ancestors, and life that cannot be replaced. When bombs are allowed to fall on this land, with fires to destroy native ecosystems, resulting in contamination seeping into the soil and water — it's not just damaging nature, its severing a relationship that is foundational to the kānaka and kama'āina

The Army has already burned nearly 20,000 acres. That's not just a statistic — that's a tragedy. That's forest, habitat, and cultural history gone. And they want to continue. The live-fire, the bombing, the desecration — this is not stewardship.

The FEIS is not enough. It does not address the gravity of what's at stake, and it certainly doesn't reflect the values that the people of Hawai'i, hold dear:

- It fails to provide real accountability for environmental and cultural damage.
- It ignores the unresolved issue of depleted uranium and its health implications.
- It offers no serious plan for mitigation or restoration.
- It goes against the intent and purpose of conservation lands.
- And most importantly, it violates the BLNR's constitutional kuleana to mālama 'āina.

This is a moment that will be remembered. Will we be the generation known for allowing sacred land to be further destroyed? Or will we be the ones who said: enough. This ends now.

Please, for the sake of this 'āina, and for all kanaka, reject this EIS. Return these lands. Let the healing begin.

With all my aloha,

Joëll M Edwards

Wainiha, Kaua'i

From: [Marie Edwards](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony opposing agenda item regarding final EIS for Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 9:28:05 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Marie Calma 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,

Marie Calma

Ewa Beach, Hi, 96706

[Sent from Yahoo Mail for iPhone](#)

From: [rose elovitz](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Submission for Agenda Item: D1
Date: Wednesday, May 7, 2025 5:07:00 PM

Aloha BLNR board members,

My name is Rose Elovitz, I write to you with the demand that you reject the us army's EIS proposal for Pōhakuloa. I found their insufficient study lacking in vital research and information necessary to defining the army's impact throughout their occupation. This lack left me with multiple questions. First and foremost, what is the impact of all the heavy metals and leads found in Pōhakuloa on the aquifer and soil? How likely is it that these substances will find their way into the water supply, causing damage to plants, animals, and humans alike? We have a right to worry as their track record in poisoning water and harming aquifers is quite extensive. Second of all, the army acknowledges parcels of land, both under state and federal jurisdiction, that fail to have survey data incorporated into the EIS. How can we understand the extent of the damage they cause to 'āina if they omit over 110,000 acres worth of impact data from their findings? Finally, outside of the biannual RIMPAC desecration exercises, the army DOES NOT have an incidental take permit. This means as a Federal entity the army must refrain from any acts that "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect endangered or threatened species of aquatic or wildlife, or cut, collect, uproot, destroy, injure, or possess endangered or threatened species of aquatic or land plants..." Since they have a permit for the RIMPAC exercises there is acknowledgment that there are endangered/threatened species in Pōhakuloa and that the army's actions necessitate an incidental take permit. Shouldn't they have to have a permit for training year round? And since they don't, are they even allowed to be exploiting Pōhakuloa as a place for live fire training? How will all of these failures on behalf of the army and their fake environmental impact survey impact their duty to clean up their mess once they leave? Under the current lease conditions and the decision of Ching vs Case, the army MUST clean up after themselves. I worry the carelessness they demonstrate in this FEIS to illustrate the grave damage they have caused to Pōhakuloa will result in their continued failure to abide by these stipulations. I once again urge the BLNR board to reject the us army's EIS proposal for Pōhakuloa.

From: [Lily Engle](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to REJECT the Army's FEIS
Date: Wednesday, May 7, 2025 4:32:11 PM

Aloha BLNR Board Members,

My name is Lily Engle. I am writing urgently to ask that you reject the army's Environmental Impact Statement on Pōhakuloa as a passionate member of the community and believer in the right of Hawaiian land to exist undefiled by the United States military. The Environmental Impact Statement in regards to the sacred grounds of Pōhakuloa is a deficient analysis of the army's true effect on the environment and fails to address critical issues, a handful of which I will summarize here.

For one, there have been no studies adequately addressing the presence of heavy metals such as lead and magnesium in the soil and their impact on the aquifer, and unreliable information on the air quality in the leased area (the last monitor was in 2007). Damningly, since the army started live-fire training at the PTA in 1943, there have been over 2,000 fires there, over 1,000 of which were caused exclusively by army activity; additionally, there has been no monitoring of greenhouse gas emissions. These environmental concerns are heightened when you consider that the state-owned land at PTA provides a potential habitat for 20 federally listed plant species, two federally listed invertebrates, three federally listed bird species, and one protected mammal species. Significant areas of the land in question have been seriously under-surveyed for cultural resources. The land that is the subject of the FEIS is only 23,000 acres out of 111,000 PTA federal land and the remainder of which go unaddressed in the document.

I support the no action alternative and no land retention by the military. For the reasons stated and for the failure of the EIS to honestly and thoroughly address the myriad inconsistencies and fallacies underlying the retention of Pōhakuloa by the United States military, please consider this call to action as we attempt to preserve the hallowed ecosystems here in Hawai'i and honor the land that has been leased to the military up to this point and which will hopefully return to the hands of Kānaka Maoli as rightful stewards and conservators of this 'āina. The state is responsible for the public trust and for future generations' right to a safe and intact Pōhakuloa. Mahalo.

Signed,
Lily Engle, member of Hui Aloha 'Āina o Honolulu

From: [Phillippe Fernandez-Brennan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for the BLNR to Reject the Current Army EIS
Date: Wednesday, May 7, 2025 8:36:18 PM

Aloha Land Board Members,

I am writing to urge you to **reject the U.S. Army's Environmental Impact Statement (EIS)** for the retention of leased lands at **Pōhakuloa Training Area**.

Pōhakuloa is not merely land—it is **wahi pana**, sacred and storied, home to irreplaceable **Native Hawaiian cultural sites**, and critical habitat for **some of Hawai'i's most endangered species**. The Army has not proven itself a responsible steward. In fact, its actions have already resulted in **irreparable harm**, including the burning of nearly **20,000 acres** of fragile landscape and habitat.

The Army's ongoing use of live-fire and bombing in this conservation district raises serious concerns about **toxic contamination**, **cultural desecration**, and the **long-term degradation** of water, soil, and biodiversity. **Depleted uranium**, known to have been used at the site, is a glaring and unresolved issue that threatens both public health and ecological integrity.

The EIS is fundamentally flawed:

- It fails to provide a **thorough or honest analysis** of environmental and cultural impacts.
- It lacks **concrete, enforceable mitigation plans**.
- It **ignores community opposition** and valid scientific concerns.
- It directly contradicts the **constitutional duty of the BLNR to mālama 'āina**—to protect Hawai'i's lands for present and future generations.

Military activities of this magnitude are **incompatible** with the principles of conservation, cultural respect, and environmental responsibility. Continuing down this path only perpetuates harm.

It is time to end this legacy of destruction. I urge you to stand with the 'āina (land), ka lāhui Hawai'i (the people), and the future of Hawai'i by **rejecting the Army's EIS** and beginning the process of healing and restoration at Pōhakuloa.

Me ka 'oia'i'o,

Phillippe Rivera Fernandez-Brennan



Phillippe R. Fernandez-Brennan, M.Ed.
UH Mānoa, Curriculum Studies | PhD Candidate
pfgalici@hawaii.edu
Hālau Kū Māna Public Charter School
Curriculum and Assessment Specialist
Kumu | Mathematics and Science
[Learn More About my Work](#)

From: [Brennan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protecting Pōhakuloa
Date: Wednesday, May 7, 2025 8:55:37 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 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 to 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,
Stephen Fernandez-Brennan
Makiki, O'ahu

From: [Wendell Figueroa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa item D-1
Date: Wednesday, May 7, 2025 8:34:30 PM

Aloha mai,

My name is Wendell Figueroa and I submit this testimony for item D-1, As a lifelong kia'i 'āina, a father, and a proud member of the Protect Kaho'olawe 'Ohana. I stand firmly in opposition to the Army's Environmental Impact Statement (EIS) and the continued lease and desecration of Pōhakuloa Training Area. My experience witnessing firsthand the devastation caused by militarization on Kaho'olawe has only strengthened my resolve to speak for the 'āina that cannot speak for itself.

Pōhakuloa, like Kaho'olawe, is not merely a piece of land—it is a sacred space with deep cultural, ecological, and spiritual significance. It is our responsibility to ensure that it is no longer subjected to bombing, desecration, and contamination under the false premise of national defense. The Army's EIS fails to address decades of irreparable damage, nor does it justify any future use that would continue the destruction. Their presence on this land has been marked by broken promises, toxic legacies, and blatant disrespect for Native Hawaiian values and stewardship.

I have walked the grounds of Kaho'olawe. I have held the shattered coral and stood on land scarred by explosives. I see those same wounds forming—and deepening—at Pōhakuloa. To continue this lease would be to perpetuate trauma, not just to the land, but to our people. The BLNR must hold firm in its kuleana to protect and preserve public trust lands. Pōhakuloa deserves the same chance at healing that Kaho'olawe is still fighting for.

I urge you, from one protector to another, to listen not to the noise of bureaucracy, but to the voice of the 'āina. The time to end this desecration is now. Reject the EIS. End the lease. Begin the healing.

Me ka ha'aha'a,
Wendell Figueroa

Sent from my iPhone

From: [Alema Fitisemanu](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please Reject FEIS
Date: Wednesday, May 7, 2025 7:51:27 PM

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

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

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

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

Sincerely,
Alema Fitisemanu

From: [Sam Foote](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Army EIS Testimony
Date: Wednesday, May 7, 2025 9:34:25 PM

I urge the Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. This environmental review is inadequate. It is missing key information, including biological and cultural surveys; ignores impacts to adjacent federal lands, a clear requirement under state law; turns a blind eye to threats to endangered species and their habitats, impacts to cultural resources and practices, and even the risk of aquifer contamination; and fails to fully describe alternative uses of the leased areas that could serve the public interest. The EIS fails to disclose the degree to which munitions continue to litter public land. The Department of Land and Natural Resources staff submittal itself calls out the Army for repeatedly refusing to address their concerns throughout the EIS process. The BLNR to stand by its staff, the community, and its mission and reject this poorly written, incomplete, and seemingly bad-faith attempt to disregard Hawai'i's Environmental Protection Act.

I urge the BLNR to ensure that future decision-making on any revised EIS and on any other matter concerning Pōhakuloa is held on Hawai'i Island. Those communities most directly impacted by - and who have the most intimate familiarity with - the lands and activities at issue must be allowed to speak directly to BLNR decision makers regarding what may be proposed for their 'āina and their moku, potentially for generations to come.

I urge the BLNR to require full transparency in any discussions and negotiations between DLNR staff and federal officials regarding the proposed military retention of any and all military-leased lands going forward. This includes regular and timely reporting regarding natural and cultural resources ma uka to ma kai, public and practitioner access, hazards to public health and safety, iwi kūpuna and historic properties, environmental remediation, climate destabilization, land valuations, mechanisms for retention, and alternative uses beyond military activity.

From: [Nani Friedman](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Wednesday, May 7, 2025 7:52:39 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Nani Friedman, and I am strongly against 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.

This hearing should not be a technical procedure of checkboxes and paperwork, but rather an opportunity for moral intervention for what is right for the people and what is right for the land.

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,

Nani Friedman

From: [Ronald Fujiyoshi](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [Maxine Kahaulelio](#); [Euel Ray Kamaau](#); [Jon Evans](#); [Greg Herbst](#); [vkahumoku@gmail.com](#); [Terina Fa'agau](#); [Clarence Ching](#); [rikikikihamana@gmail.com](#); [kepakekoa@gmail.com](#); [Kealoha Piscotti](#)
Subject: [EXTERNAL] Testimony on D-1, Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Retention at Pohakuloa Training Area, Island of Hawaii.
Date: Wednesday, May 7, 2025 8:13:05 PM
Attachments: [Dear members of the Board of Land and Natural Resources.docx](#)

Dear members of the Board of Land and Natural Resources,

Mahalo for the opportunity to testify on D_1, Decision Making Regarding the Acceptance of Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pohakuloa Training Area (PTA), Island of Hawai`i Tax Map Keys (TMKs) (3): 4-4-015:008; 4-4-016:005; and 7-1-004:007.

My name is Ronald Susumu Fujiyoshi. I live at 1196 W. Kawaihewa Street, Hilo, Hawai`i 96720. I first moved to Hilo in 1957, married a Hilo person and have used Hilo as my permanent address ever since. I am also the treasurer of Ohana Ho'opakele, one of the native Hawaiian organizations that the U.S. Army at Pohakuloa lists as an NHO. Although my permanent address is in Hilo, I served together with my spouse as missionaries of the United Church of Christ for 28 years, 20 of which were in Asia. My church, the United Church of Christ, has been named six times in Public Law 103-150 signed into law by President Clinton on November 23, 1993. This law "To acknowledge the 100th anniversary of the January 17, 1893 overthrow of the Kingdom of Hawaii, and to offer an apology to Native Hawaiians on behalf of the United States for the overthrow of the Kingdom of Hawaii." This law states, "Whereas, the indigenous Hawaiian people never directly relinquished their claims to their inherent sovereignty as a people or over their national lands to the United States, either through their monarchy or through a plebiscite or referendum." If this is true, then the Executive Orders assigning the lands of the Pohakuloa Training Area are invalid. The two Executive Orders that so-called "ceded" land to the U.S. Army were the following:

Governor's Executive Order No. 1719 dated January 26, 1956 that Ceded to the Army 758.3 Acres, and

Presidential Executive Order No. 11167 dated August 15, 1964 that Ceded to the Army 84,057 Acres.

The Kingdom of Hawaii was a "Neutral" nation. In other words, it did not permit the use of any of its lands by a foreign military power.

The Board of Land and Natural Resources, which has the responsibility to care for the leased lands in question, knows that the live firing of weapons has and is still damaging the land, plant and animal life, and the water aquifer of a huge area on Hawaii Island. The kupuna on Mauna Kea who were in the kupuna tent witnessed first-hand the explosions on the PTA. The world has acknowledged the damage of Climate Change and its effect on the world. The U.S. Military is one of the worst culprits of Climate Change.

Dear Board members, why isn't this hearing being held on Hawaii Island, the location of the PTA? We, representing much of the public, as you to do the right thing. Please reject the U.S. Army's EIS as woefully inadequate!

Mahalo for the opportunity to testify on behalf of Ohana Ho`opakele and for myself and my ohana!

From: [Elijah Gamboa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition against the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 5:08:29 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,
Elijah Gamboa
Honolulu, Hawai'i

--
Elijah Gamboa
Hana No'eau 10th Grade Project
Halau Ku Mana PCS

From: [Edith Garcia](#)
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 5:31:57 PM

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,

Edith Garcia
Hilo, HI
8083216897

From: [laureen.garcia](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Wednesday, May 7, 2025 4:09:52 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,

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,
Noelani Garcia
Waimanalo ,Hi
[Kanaka Maoli / Cultural Practitioner / Title if applicable]
[Contact Information Email to: blnr.testimony@hawaii.gov]

To:
Chair Dawn Chang
Department of Land and Natural Resources
& Honorable Committee Members

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

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

1. Continued Desecration of Sacred Sites

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

2. Environmental Irreversibility

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

3. Illegitimacy of U.S. Military Occupation

The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful

annexation of the Hawaiian Kingdom. Therefore, its continued use of Hawaiian lands for destructive military purposes is a direct violation of international law, self-determination, and the political rights of Kanaka Maoli.

4. Failure to Uphold the Public Trust Doctrine

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

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

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

Me ka 'oia'i'o,
Noelani Garcia
Waimanalo, Hi
[Kanaka Maoli / Cultural Practitioner]

From: [Rachel Gaul](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Item D1
Date: Wednesday, May 7, 2025 4:39:27 PM

I strongly oppose Agenda Item D-1. The Army has failed to consider peaceful, community-based alternatives to military occupation at Pōhakuloa. You must require a better plan.

Rachel Gaul

Sent from my iPhone

From: [Kanani Giddens](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject (EIS)
Date: Wednesday, May 7, 2025 8:59:55 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 ‘oia‘i‘o,

Kananiokaaina C. Giddens

Waimānalo, O‘ahu

Kanaka Maoli

808-853-8069

From: [Mai Hall](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Land Board Pohakuloa
Date: Wednesday, May 7, 2025 6:01:10 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.

As a spouse of an active duty Airman, and a Native Hawaiian, my needs as a Hawaiian must come first. He Hawaii au, mau a mau. I am Hawaiian now and forever. I cannot sit by and allow the military to keep desecrating Hawaiian lands. Look what the Navy did to Kahoolawe. The Army has many other lands to train at and to practice its amphibious warfare and bombing. Better yet, you can train in California where there is lots of land to destroy.

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.

The military population is unsustainable in Hawaii. Hawaiians have always been a sustainable people. We care for our lands and clean up our messes. Give us back our lands and we will clean it up the way it should be. To nourish our people, and so our legacy may live on. Do what is pono, what is just and right. Mahalo.

E malama pono,

Mai K. Hall

"A'ole pau ka `ike i ka halau ho`okahi"

~Not all knowledge is learned in the same place

~ One can learn from many sources

From: [Kiri Lou Halmos](#)
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 8:54:22 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 'oia'i'o,
Kiri Lou Halmos
Nānākuli, O'ahu
Kanaka Maoli
INPEACE ECE Educator - 'Ohana Advocate
8082923675

From: [Joseph Han](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 9:26:45 PM

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

My name is Joseph Han, an Assistant Professor in English at the University of Hawai'i at Mānoa, and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1.

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

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

Mahalo nui for the opportunity to testify.

Sincerely,
Joseph Han

--

Joseph Han | he/they
Assistant Professor in Creative Writing
University of Hawai'i at Mānoa, Kuykendall Hall 617
Author, [Nuclear Family](#) (Counterpoint Press, 2022)
<http://joseph-han.com/>

From: [Rain Hannsz](#)
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 7:09:22 PM

Aloha Members of the Board of Land and Natural Resources,

My name is Rain Hannsz, and I am writing to alert you of my 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,
Rain Hannsz
Princeville, Kauai

From: [Cory](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] NO to Pōhakuloa EIS/ May 9 item D 1
Date: Wednesday, May 7, 2025 8:20:34 PM

Aloha DLNR board members,

Thank you for your volunteer service.

Please reject the Pōhakuloa EIS.

Please heed the voices of respected community leaders who have enumerated the many flaws and shortcomings of the EIS.

Other attempts at military lease renewals are coming up soon, so your decision today will set a course not only for Pōhakuloa, but also for other cherished Hawai'i lands..

mahalo,

Cory Harden, Hilo

From: [dhpuukoa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Wednesday, May 7, 2025 8:46:52 PM

Aloha mai kākou,

As a Native Hawaiian, I strongly oppose Agenda Item D-1. Pōhakuloa is sacred ‘āina, and for too long it has been bombed, desecrated, and treated like a wasteland. The Army’s FEIS is incomplete and fails to respect our laws, our culture, and our identity. We are taught to mālama the land because the land is our ancestor. I ask the Board to fulfill its public trust duty and reject this harmful and unlawful document. Let Pōhakuloa begin to heal.

Mahalo, Mr. Donald Harp
Sent from my iPhone

From: [Isabella Hashimoto](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Wednesday, May 7, 2025 9:35:36 PM

Dear BLNR Leadership,

I implore you to reject the Army's final EIS of Pōhakuloa. The bombing desecrates the 'āina, causes environmental harm, and contaminates our water. There is no justification for these actions.

Please reject the EIS.

Mahalo,
Isabella Hashimoto
O'ahu Resident

From: [Helen Hastedt](#)
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 8:56:40 PM

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

Aloha Chair Chang and Esteemed Committee Members,

I am writing today as a concerned resident of Hawai‘i and a committed steward of the ‘āina to urge you to reject the Final Environmental Impact Statement (EIS) that supports the continued use of the Pōhakuloa Training Area (PTA) by the U.S. military.

Pōhakuloa is not just a training ground—it is a deeply significant landscape with ecological, cultural, and spiritual importance. For over seven decades, this area has endured extensive harm due to military operations. Rather than embodying responsible land management, the submitted EIS represents a path toward continued degradation and disconnection from the values of stewardship and accountability.

I respectfully submit this testimony to highlight four urgent concerns:

1. Ongoing Destruction of Culturally and Ecologically Important Sites

Pōhakuloa contains ancient trails, sacred sites, and burial areas that deserve the highest level of respect and protection. Military activities have repeatedly resulted in the bombing and bulldozing of these areas. This contradicts the Department of Land and Natural Resources’ duty to safeguard culturally and environmentally sensitive sites.

2. Severe and Lasting Environmental Damage

The environmental impacts outlined in the EIS drastically understate the long-term harm caused by decades of military use, including contamination of soil and water, threats to endangered species, and widespread habitat destruction. No mitigation measures proposed in the EIS sufficiently address the damage already done, nor do they provide a convincing basis for continued military occupation.

3. Lack of Alignment with Community Values and Historical Context

The continued use of Pōhakuloa for military purposes disregards a long history of opposition and deep concern from the local community. It is critical to recognize and reckon with this historical context and the longstanding calls for demilitarization and environmental restoration.

4. Failure to Uphold the State's Public Trust Responsibilities

Under Article XI, Section 1 of the Hawai'i State Constitution, DLNR has a legal and moral responsibility to protect Hawai'i's natural and cultural resources for the benefit of current and future generations. Approving this EIS would be a breach of that duty and a disservice to the people of Hawai'i.

As stewards of the land, we must prioritize conservation, healing, and justice over continued exploitation. I respectfully urge this committee to act in alignment with its responsibilities and the will of the community by rejecting the EIS and working toward the restoration of Pōhakuloa.

Thank you for your time and consideration.

Sincerely,

Helen K Hastedt

Honolulu, O'ahu

Environmental Science Graduate Student

From: [Mahie Hochuli](#)
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 9:39:36 PM

Aloha Members of the Board of Land and Natural Resources,

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

Pōhakuloa is not just land—it is a sacred wahi pana, a conservation district, and home to one of the last remaining subalpine tropical dryland ecosystems on Earth. For Kānaka 'Ōiwi, it is a storied and spiritual landscape. And for over six decades, it has been desecrated—bombed, burned, contaminated, and neglected.

The Final EIS is deeply flawed. It whitewashes decades of harm—both environmental and cultural—and fails to meaningfully account for the Army's long history of noncompliance. It ignores ongoing community opposition, erases the calls for accountability, and assumes future stewardship where none has been demonstrated. The courts have already ruled that the State has failed in its duty to protect this 'āina. Why should we trust that failure to continue?

Approving this EIS and extending the lease would be a continuation of harm. It would be a violation of your kuleana to the land and to the people. Pōhakuloa should never have been a training ground for war. It is time to stop the damage, not reinforce it.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Stand for this 'āina. Stand for what is sacred.

Mahalo for your time and consideration,
Māhie Hochuli
Kaua'I, Hawai'i

From: [Mark Holst](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for BLNR Agenda Item D-1 on Friday, 5-9 - Pōhakuloa
Date: Wednesday, May 7, 2025 8:30:23 PM

Aloha,

Please reject the US Army's Environmental Impact Statement (EIS) for the Pōhakuloa Training Area.

The EIS does not properly inventory native Hawaiian 'iwi bones, cultural artifacts and cultural sites.

The Army's EIS also does not provide for how these native Hawaiian family graves and sites will be protected..

These are fatal flaws in the EIS.

Please reject the Army's EIS.

Mahalo,

Mark Holst

76-222 Keakealani Drive

Kailua Kona, HI 96740

From: [Delphine Homerowski](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 4:28:17 PM

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

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

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

Additionally, 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.

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

Mahalo nui for the opportunity to testify.

Sincerely,
Delphine Homerowski

From: [Liana Honda](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] No lease renewal for Pohakuloa
Date: Wednesday, May 7, 2025 7:19:40 PM

BLNR Board -

This testimony is in opposition of the re-lease of Pohakuloa to the military. The bombing, the desecration, and the disregard of sacred and vital land has gone on long enough.

Bombing on Hawai'i Island - unacceptable. Just as it was unacceptable in Makua Valley as well as on Kahoolawe.

Let Pohakuloa be cleaned up. Let its wounds heal.

Aloha nui -

Liana Iaea Honda
Resident of Ka'ohe
(808) 960-1977

From: [Noelani Hochuli](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa - May 9, 2025
Date: Wednesday, May 7, 2025 9:36:19 PM

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

Aloha Members of the Board of Land and Natural Resources,

My name is Raynelle Noelani Hochuli 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,
Raynelle Noelani Hochuli
Kapaa, Kaua'i, Hawaii

From: [Sam Ikehara](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1 - Sam Ikehara
Date: Wednesday, May 7, 2025 9:18:01 PM

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

My name is Sam Ikehara. I was born and raised on O‘ahu and I am the granddaughter of two men who both served in the U.S. military and were awarded for their service. Like many in Hawai‘i, my family's history is entangled with the U.S. military. I am writing today because that has been our past--both my family's and Hawai‘i's more largely--but it does not have to be our future. I am deeply opposed to the U.S. Army's proposed retention of the lands that make up Pōhakuloa Training Area (PTA), and I respectfully urge you all to reject the Army's environmental impact statement.

I received my Ph.D. in American Studies from USC, and I was recently hired by UH Mānoa as a professor in the same department. One of the classes that I am tasked with teaching is called "American Environments," where I share with students the cultural and political histories and presents of what we have come to regard as "natural" and "built" environments, with a focus on Hawai‘i. Unfortunately, my teaching on this topic inevitably must address the long history of negligence and mismanagement that characterize much U.S. oversight of Hawaiian lands and waters. For example, how was the abundance of Pu‘uloa, which fed the entire island of O‘ahu and more, transformed into the "American environment" Pearl Harbor, one of the most contaminated sites in the world? In the class, we address questions such as these, and we discuss the competing arguments about these sites, such as the "need" for these sites by the U.S. military against the need of these sites for the sustenance and well-being of the people of O‘ahu.

Pōhakuloa Training Area is a site of inquiry in the class, where we consider how one of the world's rarest ecosystems--more specifically, a sub-alpine tropical dryland forest--which houses a number of endangered species indigenous to Hawai‘i is also a site of wide-spread contamination, regular (and preventable) wildfires, and live-fire training for which there is no regular clean-up. Your own staff mentioned in their report that they have concerns that there is a "lack of evaluation of impacts in the Federally owned impact area which is the main receiving area for live rounds being fired during training activities....any impacts to the impact area are expected to continue." The continuation of such environmental harm is especially concerning given that "the inventory of archaeological sites is incomplete" and that the FEIS suffers from a "lack of current studies and/or robust summaries to provide data and analysis regarding endangered biological resources."

Perhaps most significantly, your staff state explicitly that "military use is neither consistent with the overall objective nor the allowable uses in the Conservation District" and that the U.S. Army failed to offer any alternatives in which they could act in accordance with the Conservation District. The reality is that live-fire training--which endangers all communities, both human and nonhuman, both now in this moment and for generations to come through depleted uranium and other environmental impacts we cannot fully discern now--is and will never be compatible with the protections that should be guaranteed by conservation district status. I realize that the Army has argued in the past that the conservation district designation came after the signing of their lease and thus cannot be enforced. But right now is a crucial juncture in which BLNR has the opportunity to fulfill its mission of protecting Hawai'i's

natural and cultural resources, a mission that is embodied in the state constitution. I respectfully urge you to fulfill this responsibility by rejecting this FEIS.

I will be teaching this course at UH Mānoa for many years to come, and it is my hope that I will be able to share with future generations of students Pōhakuloa as an example of an environmental injustice that was ultimately corrected through community organizing as well as the support of brave leadership that was capable of demanding that the U.S. Army be held accountable for the harms it has long inflicted on these lands and waters. We can no longer allow them to desecrate and destroy Hawai'i. Please uphold the law and your responsibility that is written into the state constitution and REJECT the FEIS.

Mahalo nui loa for the opportunity to share testimony,
Sam Ikehara, Ph.D.

From: [Lindsey Ilagan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] AGENDA ITEM D-1: Written Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Wednesday, May 7, 2025 7:30:57 PM

Re: Agenda Item D-1

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

My name is Lindsey Ilagan. I submit this testimony in unwavering **OPPOSITION** to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area.

Simply, the EIS does **NOT** accurately describe the significant and complex impact of the U.S. military's destruction on Pōhakuloa.

Deeper, the EIS is fundamentally flawed. It is missing key information on the biological and environmental impact, failing to acknowledge impacts to adjacent federal lands, threats to already endangered species and their habitats, and threats of contamination of our precious aquifer. Beyond this, the EIS continues to fail in disclosing the degree of destruction, in particular the munitions littered across the 'āina. Accepting the EIS would be accepting that destruction is acceptable in conservation lands, which makes zero sense and is in direct opposition of State law and mālama 'āina. The cost of accepting this EIS will reverberate for generations and will be paid by not only us here today, but also our mo'opuna, our future kūpuna.

The EIS also fails to acknowledge key information about cultural impact, failing to describe the destruction and displacement of cultural resources, as well as alternative uses of the leased areas that could better serve our community. Frankly, destruction of this 'āina is a direct assault on Kānaka 'Ōiwi as the life of our people and the land are inseparable. When Pōhakuloa is desecrated, so is our very identity, historical continuity as a culture and people, and wellbeing of our lāhui, and is a violation of self-determination. As Kānaka 'Ōiwi yourselves, I know you understand.

Pōhakuloa is a sacred and storied wahi pana, rich with cultural significance, and as present is under the kuleana of our State to protect. It is also home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth, as well as the physical location of irreplaceable cultural artifacts and 'iwi kūpuna. It deserves reverence, not desecration.

Yet, for over six decades, the U.S. military has treated Pōkahuloa with reckless disregard. They have bombed the 'āina we hold sacred, contaminated it with depleted uranium, ignited wildfires, and violated the conditions of the 1964 lease that was granted for a single dollar.

Ultimately, the EIS is lacking and washes the military's long record of environmental degradation, cultural harm, and legal noncompliance. Whether you look at this from the

angle of environmental conservation, wildfire prevention, public health, cultural preservation, or compliance with State law, the answer is all the same: reject the EIS.

Mahalo, Lindsey Ilagan Kapolei, O'ahu

From: [Kilihea Inaba](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition of the Pōhakuloa EIS
Date: Wednesday, May 7, 2025 4:30:01 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**.

For too long we have allowed the destruction of our island. We know have the opportunity to deny further desecration by rejecting the Army's EIS (rightfully so).

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.

Me ka haahaa,

Kilihea Inaba

Kaloko, Kona, Hawai'i

From: [Tristan Inofinada \(2025\)](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 9:39:24 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. As a senior of Hālau Kū Māna Public Charter School, the continuation of the desecration of Pōhakuloa would further devastate the state of our sacred wahi pana for myself and my children to continue bearing. The continuation of this impact of desecration is devastating to the people of Hawai'i.

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,
Tristan Kamuela Ka'imipono Inofinada
Kalihi, O'ahu

--

"It is a blessing to be the color of earth, do you know how often flowers confuse me for home?"

- rupi kaur

Tristan Kamuela Ka'imipono Inofinada
Halau Ku Mana Public Charter School (HKM)

From: [Krystal Jacobs](#)
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 7:42:38 PM

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

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

Aloha Members of the Board of Land and Natural Resources,

‘O Krystal Kūpa`akamana`o Jacobs ko`u inoa. No Kapolei au, kahi o ko`u mau makua e noho nei. Noho au i Kaleponi i kēia manawa. Ke kākau nei au me ka mana`olana e loa`a iā `oe kēia me ka pu`uwai hāmama.

My name is Krystal Kūpa`akamana`o Jacobs, 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. Even from afar, I am called to protect the very land that I one day hope to return to. Please help ensure there is `āina for me to return

to.

Mahalo for your time and consideration,
Krystal Kūpa`akamana`o Jacobs
Kapolei, HI / Oakland, California

From: [Waikiki - Hawaii Condo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 6:44:45 PM

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

I am writing to ask you to reject the FEIS.

It is:

- inadequate,
- deficient,
- biased, and
- unacceptably and obviously skewed to keep control of state lands with leases that should be terminated immediately.

Mahalo,
Kim Jorgensen
Waikiki

From: [Kaili Kosaka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to U.S. Army EIS on Pohakuloa
Date: Wednesday, May 7, 2025 8:48:36 PM

Aloha Board of Land and Natural Resources,

I am writing to urge you to reject the U.S. army's Environmental Impact Statement.

As a resident of Hawaii Island, the continued presence of the Army at Pohakuloa poses a direct threat to the health and safety of my family and the many other residents that call Hawaii island home. The bombing, mismanagement of cultural and environmental resources, and lack of respect must end.

I have seen bombing drills, helicopter operations, heard the gun fire. The dirt kicked up over saddle is dangerous and obviously harms the native flora and fauna of our rapidly depleting dry land forest. We cannot believe the army is acting in the best interest of the land or being good stewards, when they blatantly destroying Pohakuloa.

This board has a responsibility to protect this land and its natural resources. The people of Hawaii and its future generations will remember the pivotal decision made today. We urge you to reject the Army EIS and stop the desecration of our beautiful island home. Please do the right thing.

Sincerely,
Kaili Mele Kaeo

From: [Jenesus Kahaialii](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to Agenda Item D-1
Date: Wednesday, May 7, 2025 8:33:35 PM

My name is Jenesus Kahaialii, and I was born and raised in Lahaina. I am writing to urge you to uphold your constitutional responsibility to protect Hawai‘i’s natural and cultural resources.

The BLNR has a constitutional duty under the public trust doctrine to safeguard these resources for present and future generations. The Army’s Final Environmental Impact Statement (FEIS) does not provide the data necessary for you to fulfill that duty. Approving this document would violate that responsibility.

I respectfully urge you to reject Agenda Item D-1.

Mahalo for your time and consideration,

Jenesus Kahaialii

From: [kaysha kahai-enos](#)
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 8:20:52 PM

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—

From: [Hulali Kahaikupuna](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] item D-1 testimony
Date: Wednesday, May 7, 2025 8:30:08 PM

Aloha my name is Hulali Kahaikupuna. I respectfully submit this testimony to ask that you reject the FEIS for continued military use of Pōhakuloa. This document does not meet environmental, legal or ethical standards expected in Hawai‘i. The people of Hawai‘i have been ignored for far too long. The 1993 Apology Resolution by former Bill Clinton acknowledges the relationship of the Native Hawaiians and their ‘āina. In order for this acknowledgement to be fulfilled, the military lease needs to come to an end. This will allow for the ‘āina to be returned and cared for the way it should be, allowing the ‘āina to thrive and serve its natural purpose. Mahalo for hearing my testimony.

Mahalo,
Hulali Kahaikupuna

From: [Hulali Kahaikupuna](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] item D-1 testimony
Date: Wednesday, May 7, 2025 8:39:56 PM

Aloha my name is Jerry Kahaikupuna. I am a concerned citizen writing in opposition to Agenda D-1. The Army's failure to consult 'Aha Moku or conduct meaningful analysis of cultural impacts is a reason enough to reject the FEIS. The refusal to complete biological and archaeological surveys which can lead to the permanent loss of endangered species, iwi kūpuna and cultural artifacts. This is unacceptable. Mahalo for hearing my testimony.

Mahalo,
Jerry Kahaikupuna

From: [Kuhao Kahaikupuna](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] item D-1 testimony
Date: Wednesday, May 7, 2025 8:03:20 PM

Aloha my name is Kūha‘o Kahaikupuna. As a young member of the community, I believe the BLNR has a duty to protect cultural and natural resources for future generations. The Army’s FEIS is incomplete and fails to consult properly with cultural practitioners. The FEIS leaves many questions unanswered about endangered species, iwi kūpuna and sacred lands. It should not move forward. Please deny the EIS. Mahalo for taking the time to hear my testimony.

Mahalo,
Kūha‘o Kahaikupuna

From: [Nanea Kahaikupuna](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] item D-1 testimony
Date: Wednesday, May 7, 2025 7:56:35 PM

Aloha my name is Nanea Kahaikupuna. I respectfully submit this testimony to ask that you reject the FEIS for the continued military use of Pōhakuloa. This document does not meet environmental, legal, or ethical standards expected in our state. The FEIS ignores the unique relationship between Native Hawaiians and the ‘āina at Pōhakuloa. As a young Native Hawaiian, I believe it is my responsibility to honor and protect the ‘āina of my kūpuna. I plan to continue to build pilina with the ‘āina, learning its history and traditions, while working towards preserving its natural resources for future generations. Mahalo for taking the time to hear my testimony.

Mahalo,
Nanea Kahaikupuna

From: [TARA KAHALEWAI](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] PROTECT PŌHAKULOA
Date: Wednesday, May 7, 2025 4:30:22 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 'oia'i'o,
Chentara Kahalewai
Maui, Hawai'i
Kanaka Maoli
808-468-8878

From: [kamalei](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Wednesday, May 7, 2025 4:22:54 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,
Kamalei Elizabeth Kaleoaloha Kaina
Papakōlea, O‘ahu, Hawaii

From: [Mae Kaler](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Training Area
Date: Wednesday, May 7, 2025 9:37:48 PM

I urge the Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. This environmental review is inadequate. It is missing key information, including biological and cultural surveys; ignores impacts to adjacent federal lands, a clear requirement under state law; turns a blind eye to threats to endangered species and their habitats, impacts to cultural resources and practices, and even the risk of aquifer contamination; and fails to fully describe alternative uses of the leased areas that could serve the public interest. The EIS fails to disclose the degree to which munitions continue to litter public land. The Department of Land and Natural Resources staff submittal itself calls out the Army for repeatedly refusing to address their concerns throughout the EIS process. The BLNR to stand by its staff, the community, and its mission and reject this poorly written, incomplete, and seemingly bad-faith attempt to disregard Hawai'i's Environmental Protection Act.

I urge the BLNR to ensure that future decision-making on any revised EIS and on any other matter concerning Pōhakuloa is held on Hawai'i Island. Those communities most directly impacted by - and who have the most intimate familiarity with - the lands and activities at issue must be allowed to speak directly to BLNR decision makers regarding what may be proposed for their 'āina and their moku, potentially for generations to come.

I urge the BLNR to require full transparency in any discussions and negotiations between DLNR staff and federal officials regarding the proposed military retention of any and all military-leased lands going forward. This includes regular and timely reporting regarding natural and cultural resources ma uka to ma kai, public and practitioner access, hazards to public health and safety, iwi kūpuna and historic properties, environmental remediation, climate destabilization, land valuations, mechanisms for retention, and alternative uses beyond military activity.

Sent from my iPhone

From: [Mahina Kaomea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 9:28:46 PM

Aloha Chair Chang and Members of the Board,

My name is Mahina Kaomea, and I am a member of Hui Aloha ‘Āina o Honolulu. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army’s proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen ‘āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to **reject this FEIS** and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this ‘āina.

The most egregious failures of the FEIS 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 'oia'i'o,
Mahina Kaomea
He'eia, O'ahu

From: [Karlee Kaono](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, May 7, 2025 9:15:24 PM

Aloha, my name is Karlee Ke'alahilani . 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.

Mahalo,
Karlee Ke'alahilani

From: [Jordan Kapeliela](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony in opposition
Date: Wednesday, May 7, 2025 9:18:19 PM

To the Board of Land and Natural Resources:

I submit this testimony in firm opposition to any lease renewal, extension, or land exchange related to the U.S. Army's continued occupation of the Pōhakuloa Training Area.

For over six decades, the military has used Hawaiian land to conduct destructive weapons training, leaving behind unexploded ordnance, toxic contamination, and depleted uranium—yet has failed to clean up a single acre. This is not speculation; it is documented fact. In 2018, the Hawai'i State Circuit Court ruled that the State violated its constitutional duty under the Public Trust Doctrine by failing to ensure the land was properly cared for. That decision stands unaddressed. No remediation. No justice.

Let us be absolutely clear: **Pōhakuloa is not empty land.** It is home to endangered species, cultural sites, and iwi kūpuna. Under Article XI, Section 1 of the Hawai'i State Constitution, the State is bound to protect and conserve these public trust resources for the benefit of present and future generations. Renewing this lease would be a betrayal of that mandate.

If a private tenant had poisoned conservation land for 65 years, failed to clean it up, and then asked for more—this Board would never approve it. To grant the military that privilege is not only hypocritical—it is immoral.

Security arguments ring hollow when weighed against the desecration of sacred land and the erosion of public trust. This is not just a land-use decision. It is a moral reckoning. Continuing this lease would signal to the people of Hawai'i and the world that laws, culture, and 'āina are negotiable—if you carry a big enough gun.

I call on you to do what is right. Not what is convenient. Not what is politically expedient. What is pono.

Reject the lease. Begin the healing.

Ua mau ke ea o ka 'āina i ka pono.

From: [Sheala Karratti-Humphries](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony regarding the rejection of the final EIS for the Army Training Land Retention at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 7:28:21 PM

I am a lifelong resident of Hawaii and kanaka maoli. I am asking the Board of Land and Natural Resources to reject the US Army's EIS as it inadequately addresses a multitude of environmental, cultural, and public safety concerns. The US Military as an institution has continually failed to be adequate stewards of the land and have violated many sacred and ecologically important sites across Hawaii.

All the money spent by the US Military is used to practice killing others (i.e., shooting live rounds, exploding ordnance, fuel) subsequently poisons the 'āina and wai. Imagine if that same amount of money was instead used to protect what makes Hawaii special—the trees, the animals, mountains, the people...hū! We could do some amazing things! I hope the Board of Land and Natural Resources rule in Hawaii's best interest by keeping our 'āina and wai healthy, ensuring a thriving future for Hawaii's people.

Thank you,
Sheala Karratti-Humphries

Sheala

From: [‘Alihilani Katoa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 5:34:20 PM

Aloha e Chair Case and Members of the Board,

My name is ‘Alihilani Katoa, and I am submitting this testimony as a community member of Hui Aloha ‘Āina o Honolulu. I am urging you to reject the Final Environmental Impact Statement (EIS) for the U.S. Army’s continued use of lands at Pōhakuloa Training Area (PTA).

This EIS is fundamentally insufficient in addressing and preventing the ongoing harm to Native Hawaiian bird species, including those already lost to us forever. The document passively lists species and survey data, but fails to account for the cumulative and irreversible impact of military activities on endemic birds—three of which have already gone extinct as a direct result of operations at PTA. These are not just data points. These are the devastating losses of Hawai‘i for the false sense of security that PTA provides.

The ‘Ō‘ū was once found in forests across Hawai‘i Island, including areas near Pōhakuloa, but has not been seen since the 1980s—lost to habitat destruction, avian malaria, and predation by introduced species. The Kāma‘o, a close relative of the ‘Ōma‘o (still found at PTA today), likely shared the Saddle Region. It too is extinct. The ‘Akialoa, a long-billed honeycreeper from MaunaKea’s high-elevation forests, is gone—every species of it. The Palila, now critically endangered, survives only on MaunaKea and relies entirely on the dwindling Māmane forest. These birds—once vibrant members of Hawai‘i’s ecosystems—have vanished or are vanishing due to habitat degradation, noise disturbance, and militarization.

Yet the Army’s reporting claims “no incidental takes” under the Migratory Bird Treaty Act in 2022–2023, ignoring decades of cumulative harm from habitat destruction, contamination, unexploded ordnance, and noise pollution. This narrow framing erases the truth. The ‘ua‘u (Hawaiian petrel), ‘akē‘akē (band-rumped storm petrel), and ‘io (Hawaiian hawk) continue to be pushed out of their habitats on State-managed lands, and the lack of species-specific research makes the Army’s conclusions questionable at best.

In 2024, \$1.3 million was invested to restore over 3,000 acres of native forest in upper MaunaKea, yet the EIS fails to explain how live-fire training and bombing at PTA, just upslope, won’t undermine these efforts. The contradiction is clear: the land can’t be restored and destroyed at the same time.

The EIS also notes that 38 bird species were observed but only five native birds were detected on State lands. This is not proof of “proactive management,” as the Army claims, it’s a warning. A warning that we are failing to preserve our native avifauna, many of which are culturally sacred and ecologically essential.

We, the lāhui, must stop accepting incomplete mitigation plans and vague assurances that lead to the slow erasure of our ‘āina and native species. It is our collective kuleana to protect our lands—not to let them be sacrificed for military convenience. We cannot allow the ongoing destruction of sacred spaces, endangered birds, and ancestral ecosystems to continue under the guise of national security.

Let us stand together—for our ‘āina, our native species, and the generations yet to come. **E kū‘ē, e kūpa‘a.** Demand real accountability, no more empty promises.

A hiki i ke aloha ‘āina hope loa

From: [Kahealani Keahi](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pohakuloa - Testimony
Date: Wednesday, May 7, 2025 5:29:54 PM

Aloha BLNR,

Hui Makaainana a Kalawahine, a Hawaiian Homelands beneficiary Native Hawaiian Organization, strongly opposes the continued desecration of aina, specifically in this case, Pohakuloa. We respectfully ask the Board to reject the Army's Final Environmental Impact Statement. Here are my reasons:

1. The Army admits widespread contamination but refuses to assess or clean it up.
2. The Army cannot prove that contamination hasn't spread into water or ecosystems.
3. The Army won't share safety procedures or spill data, and deletes critical information.
4. Fires, endangered species, and climate harms are dismissed without evidence.
5. The Final EIS evades Hawai'i law by ignoring obvious cumulative impacts.

Please help protect our land and resources by rejecting this EIS. Together with the natives of this land, we want the aina to heal and flourish again.

Ke aloha aina,
Kahealani Keahi
President
Hui Makaainana a Kalawahine

From: [PK](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Army's Final EIS for Pōhakuloa
Date: Wednesday, May 7, 2025 4:51:18 PM

Aloha BLNR,

I respectfully ask the Board to reject the Army's Final Environmental Impact Statement. Here are my reasons:

1. The Army admits widespread contamination but refuses to assess or clean it up.
2. The Army cannot prove that contamination hasn't spread into water or ecosystems.
3. The Army won't share safety procedures or spill data and deletes critical information.
4. Fires, endangered species, and climate harms are dismissed without evidence.
5. The Final EIS evades Hawai'i law by ignoring obvious cumulative impacts.

Please protect our land and resources by rejecting this EIS.

Mahalo,

Pi'imoku Keahi

From: [Kona Keala-Quinabo](#)
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 4:34:35 PM

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 'ōia'i'o,

Dr. Kona Keala-Quinabo



May 7, 2025

To: Hawai'i Board of Land & Natural Resources

From: Dr. Roxane Keli'ikipikāneokolohaka, Executive Director, Kia'i Kanaloa

RE: May 9, 2025 Mtg. Agenda Item D-1: Decision Making Regarding the Final EIS for the Army Training Land Retention at Pōhakuloa

Aloha,

On behalf of Kia'i Kanaloa, mahalo for this opportunity to provide written testimony regarding Agenda Item D-1: Decision Making Regarding the Final EIS for the Army Training Land Retention at Pōhakuloa. Our members from across the pae'āina serve as Kia'i to our Kanaloa forms. We strongly urge you to REJECT the Army's Final Environmental Impact Statement.

I am one of the many who testified before representatives of the U.S. Army Garrison Hawai'i in Hilo in April of 2024. The standing-room-only crowd overwhelmingly called for the No Action Alternative. In my testimony, I stated that the No Action Alternative was the first step of many that the military should be taking to begin to rectify its footprint that has manifested detrimental change to the landscape, habitat, and wildlife. Allowing continued military activity here further exacerbates the potentiality of severe, irreparable harm. In this Final EIS, the Army has failed to adequately respond to the many grave concerns brought forth in Hilo and at every other opportunity the public was given to speak to their occupation of Pōhakuloa. The military has grown accustomed to the standard practice of dismissiveness and defiance. The Army's countless failures have also been called out in the past by DLNR to no avail. By their own admission, they do not plan to clean up Pōhakuloa. We, the people of Hawai'i, will be at the mercy of that impact for generations.

And so now, we are here, and YOU are Hawai'i's last line of defense. The mission of the Hawai'i Board of Land & Natural Resources is stated to be to, "Enhance, protect, conserve and manage Hawai'i's unique and limited natural, cultural and historic resources held in public trust for current and future generations of the people of Hawai'i nei, and its visitors, in partnership with others from the public and private sectors." We call upon you in this inherent capacity of "Kia'i" to REJECT the Army's final EIS.

If your decision allows the Army to skirt responsibility and due process again, the integrity and function of the Board of Land & Natural Resources would be severely and irreparably diminished. As Hawai'i braces for the impending onslaught of attacks against the environment, culture, heritage and science by the Trump administration, we, the people of Hawai'i need the state legislators and agencies to genuinely serve Hawai'i as Kia'i of our 'āina and the public trust.

Me ka 'oia'i'o,

Roxane Keli'ikipikāneokolohaka

Kia'i Kanaloa, Executive Director



(808) 987-0453



kiaikanaloa@gmail.com

Mailing Address

1889-A Kīlauea Ave.
Hilo, HI. 96720

From: [Wendy Keliikoa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, May 7, 2025 7:58:46 PM

Aloha,

Please reject the US Army's EIS! On behalf of the Iwi Kupuna carelessly stored away in a shipping container in the hot area of Pohakuloa please reject the US Army's EIS! If that were your Iwi Kupuna, (like ours) and you realized that your Iwi Kupuna were violated and not given the proper dignity of having their remains go back to the caves where they were removed from or given back to the ohana, as a Kanaka wouldn't you be angry? Wouldn't it be a shame if we kanaka went to somewhere like Arlington National Cemetery and started removing their remains and bombing their "sacred" place, wouldn't the Americans be very upset? Think about it...

Mahalo Nui For Your Time,

Donovan Keliikoa

From: [Jonmarie Kerns](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] DO NOT RENEW
Date: Wednesday, May 7, 2025 6:17:00 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,
Jonmarie Kailoa Kerns
Kawaihae, Hawaii Island

From: [KALANIKIMBUILDERZ](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Wednesday, May 7, 2025 7:35:25 PM

Sent from my

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,
[milton Kalani Kim jr]
[honolulu,hawaii]
[Kanaka Maoli / Cultural Practitioner /
[kalanikimjr@yahoo.com

From: [Taelee Kimura](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Wednesday, May 7, 2025 9:25:55 PM

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

My name is Taelee Kawahinenanea Kimura, and I am 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 now is the time for the site to heal, not further destroyed.

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

Mahalo for your time and consideration,
TAELEE KAWAHINENANEA KIMURA, Kanaka 'pieu

Kilauea, Kaua'i, Hawai'i

Best regards,
Taelee Kimura

From: [Anne Krause](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 4:13:35 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,
Anne Krause
UH Manoa '78
Currently living in Illinois with Aloha in my Heart

From: [Sarah Tamashiro Kuaiwa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] TESTIMONY: Pohakuloa EIS
Date: Wednesday, May 7, 2025 6:26:30 PM

Aloha,

My name is Sarah Kuaiwa and I would like to submit the below testimony ahead of the May 9 BLNR meeting concerning the Army's EIS of Pohakuloa:

As lineal descendants of Kohala and Hamakua, 'ohana Kuaiwa calls on the BLNR to vehemently reject the Army's final EIS report. We believe that Pohakuloa should no longer be used by the Army for active fire training. The land has been abused for generations and needs to be healed, restored, and conserved. The land is not being protected by the state and is worse off being used by the Army.

Mahalo,
Sarah Kuaiwa

From: [Jessica K](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1 (testimony in opposition)
Date: Wednesday, May 7, 2025 3:57:31 PM

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

My name is Jessica Kuzmier and I am a resident of West Hawaii Island. I am writing to 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. 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 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.

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, Jessica Kuzmier, West Hawaii Island

From: [Shawn Labrador](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Wednesday, May 7, 2025 5:12:06 PM

There is no justification for approving a document that ignores DLNR staff recommendations and omits required cultural and biological surveys. Please vote no on Agenda Item D-1.

Shawn Kanani Kekahio Labrador

Sent from my iPhone

From: [Maile Lavea-Malloe](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1: REJECT the Final EIS
Date: Wednesday, May 7, 2025 8:49:46 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,

Maile Lavea-Malloe

Puualala, Makahanaloa, Pepekeo, Hawaii

From: [West LeClay](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Item D1
Date: Wednesday, May 7, 2025 8:21:49 PM

Aloha, please reject Agenda Item D-1. This document leaves out critical protections for endangered species and cultural heritage. We cannot allow this negligence to go unchallenged.

West LeClay
(808)294-8719
wleclay@gmail.com

Sent from my iPhone

From: lehua27@gmail.com
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony of Rejection
Date: Wednesday, May 7, 2025 5:07:46 PM

Aloha,

I am testifying a non-acceptance of the Final Environmental Impact Statement (EIS)

Pohakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawaii's most endangered species. The Army has not demonstrated the capacity or will to serve as a proper steward of this land.

The EIS is inadequate in addressing the environmental and cultural impacts to the area.

Mahalo!
Lehua

From: [Alison Lewis](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] May 9, 2025 BLNR hearing agenda item 1: opposed
Date: Wednesday, May 7, 2025 7:47:07 PM

May 7, 2025

Greetings Board Members,

This testimony is in OPPOSITION to BLNR approving the US Army's EIS on Pōhakuloa training area lands. Please do not approve the EIS.

I am Alison Lewis. I am a combat veteran of the Gulf War. I live on the island of Kaua'i. This is my Testimony AGAINST approving the Army's EIS, a part of the process of trying to extend their time of use of Pōhakuloa lands on Moku o Keawe.

The continued military use of Pōhakuloa lands will erode public trust of DLNR, regardless of input sessions, procedural checklists, and any other stage dances. It will make liars out of civilian administrators (like BLNR board members) who claim they are "committed to protecting Hawaiian land and honoring the Hawaiian people."

The abuse and misuse of Hawaiian lands threatens the safety of every US serviceman in Hawaii. Hawaiian nationals feel a deep and justified resentment at the desecration of their lands. Bombing and shelling does not protect Hawaii. Instead, it endangers the health and safety of Hawaii's people and future generations. Military bombing and shelling desecrates cultural and historic sites at PTA. Military toxins are carried long distances in the strong winds that blow through the area. The toxins risk contaminating Hawaii Island's aquifers below Pōhakuloa in the center of Hawaii Island. Military bombing and shelling has started 1261 wildfires at PTA since 1975 according to the military final EIS on Pōhakuloa. The military also says that data prior to 2012 is incomplete so the actual number of fires could be higher. The final EIS also says that the wildfire risks will only increase in the future with the extremes of climate change increasing. Claims that PTA plays a crucial role in national security, cultural preservation, and environmental stewardship are a FRAUD. Bombing is Desecration. Polluting the Air, Land, and Water with Deadly Toxins is Desecration. The "state" of Hawaii needs to stop allowing ANY of it! Make the Military Clean up it's Toxic Mess & Return the Stolen Land to the Hawaiian People.

Please consider: what level of "national benefit" does the USA think justifies the destruction of places that are sacred to a people? And do YOU agree with that?? The USA government claims to be saving the world from fascist dictators (like Saddam Hussein), saying that such dictators will wantonly destroy things that are precious and irreplaceable to people. But in the name of "staying prepared" to do this world-saving, the USA itself wantonly destroys things that are precious and irreplaceable to people (Kaho'olawe, Ka'ula, Pōhakuloa)!

It is irrational and psychotic. Don't be a part of it. Help to stop it!

I beg you to thoroughly read the testimonies that the people, especially kanaka maoli, have sent you. They are begging you to save what is sacred to them. Don't just scan over the documents and then check a small square somewhere that says you "gathered public input." Have honor, have integrity. Be trustworthy. Use your power as a board member to perpetuate GOOD instead of evil. What legacy do you want to leave for your grandchildren?

What will they think of your actions, once they are grown up and understand this world and see your intentional effects on it?

Board members, your answer should be “NO,” to the Army’s EIS. Do not approve it.

Alison Lewis

Darryl K. Lindsey
200 Upper Kimo Drive
Kula, HI 96790
Ltclindsey@gmail.com
808.987.5200
May 7, 2025

Honorable Dawn S. Chang
Chairperson
Members of the Board
Board of Land and Natural Resources
Honolulu, HI 96809

Subject: Support for Army Retention of Pōhakuloa Training Area

Dear Ms. Chang

I am writing to express my strong support U.S. Army retention of the Pōhakuloa Training Area (PTA). PTA has played a vital role in military training since World War II¹ in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercises², and live-fire drills.³ If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.⁴

As a resident of Hawai'i, born and raised in Hilo, and retired army officer, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard.

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

Critical for the Hawai'i Army National Guard: PTA played and continues to play a critical role in training our own Hawai'i Army National Guard Troops. PTA was very instrumental in preparing our Guardsman for their deployments to Iraq and Afghanistan from 2004-2013, and 2023.⁵ Training at PTA was also critical for our Hawai'i Guardsmen in preparation for their 2019

¹ Koehnen, F. J. (2015). *Been There Done That Back to Hilo*. Hilo, Hawaii, United States of America: Lyman Museum and Mission House, (143,144)

² <https://www.dvidshub.net/image/8098598/jpmrc-24-01>

³ <https://www.dvidshub.net/image/6533705/range-qualification-and-training-pohakuloa-training-area>

⁴ https://www.army.mil/article/269078/pta_continues_to_draw_dignitaries_due_to_critical_mission_in_the_pacific

⁵

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

deployment to the Sinai in Egypt and to Kosovo. Under presidential orders, the Hawai'i Army National Guard continues to deploy our Hawai'i Soldiers across the world, with 8 Soldiers to West Africa in support of Operation Juniper Shield⁶ in 2023, and the 2-641 Aviation Regiment deployment to the Middle East in support of Operation Enduring Freedom - Spartan Shield in 2024.⁷ By retaining this land, we can continue to support our Hawai'i National Guard in ensuring that our Guardsman have the best training in preparation for their deployments in these operational contingencies and combat zones.

Having served in both Iraq and Afghanistan, pre deployment training at PTA provided realistic training in similar environments which I experienced overseas. The reality is training at PTA better prepared soldiers and saved lives.

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

Sincerely,

Darryl K. Lindsey

// Darryl K. Lindsey//

6

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

7

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

From: [Kayla Lindsey-Asing](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [Kayla Asing](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1 (May 2025)
Date: Wednesday, May 7, 2025 5:20:04 PM

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

My name is Kayla Lindsey-Asing and I respectfully urge you to do the right thing and **REJECT the clearly insufficient Final Environmental Impact Statement (FEIS)** for the U.S. Army's continued use of public, "ceded" lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island **in Agenda Item D-1 (May 2025).**

The FEIS, as submitted, fails on multiple critical fronts. It lacks the necessary biological and cultural surveys, omits key assessments of alternative land uses, and neglects to address serious and ongoing environmental impacts—particularly to endangered native species and iwi kūpuna. These omissions make it impossible for the Board to meet its constitutional obligations under the public trust doctrine, which requires due diligence and prudent stewardship of Hawai'i's natural and cultural resources for both present and future generations.

For generations, Native Hawaiians have endured the desecration of sacred 'āina at Pōhakuloa, where bombing, contamination, and destruction have left lasting psychological, spiritual, and physical harm. The U.S. Congress itself, in the 1993 Apology Resolution, recognized the intrinsic and unique relationship between the well-being of the Hawaiian people and their connection to 'āina. Yet this FEIS fails to account for those impacts or honor that relationship. Accepting this dangerously deficient document would perpetuate harm and silence the voices of the community who have long called for accountability and the restoration of ancestral lands.

Accordingly, **I strongly urge the Board to reject this FEIS** and uphold your responsibilities to Hawai'i's people, 'āina, and future.

Mahalo nui for the opportunity to testify.

me ka ha'aha'a

na Kayla Lindsey-Asing



Kayla Lindsey-Asing
Event & Program Facilitator
kaylas@hawaii.edu

'Imiloa | Ke Kulanui o Hawai'i ma Hilo
600 'Imiloa Place
Hilo, HI 96720
(808) 932-8901

CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use,

dissemination, copying, or storage of this message or its attachments is strictly prohibited.



Ka Moku‘āina ‘o Hawai‘i
Ka ‘Oihana Kumuwaiwai ‘Āina
Board of Land and Natural Resources
DLNR Boardroom, Kalanimoku Building, 1151 Punchbowl Street, 1st Floor
Online via Zoom Meeting ID: 867 3731 9705

9:00 AM, May 9, 2025

Via E-mail: <blnr.testimony@hawaii.gov>

Re: 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.

Aloha Chair Dawn Chang and members of the board,

The Prince Kuhio Hawaiian Civic Club opposes the acceptance of the Final Environmental Impact Statement for the Army Training Land Retention at Pōhakuloa. Further, the club stands in solidarity with the Association of Hawaiian Civic Clubs and fully supports Association Resolution NO. 2024-59 and Resolution NO. 2024-58. We urge the Board of Land and Natural Resources to take a firm stance on the issues surrounding the U.S. Military leases that expire in 2029.

Pōhakuloa Training Area is more than just a piece of land; it is a wahi pana, a sacred and storied place that is home to irreplaceable Native Hawaiian cultural sites and some of Hawai‘i’s most endangered species. The U.S. Army has not demonstrated the capacity or will to serve as a proper steward of this land, and the Final Environmental Impact Statement (FEIS) fails to meaningfully address these concerns.

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.

However, if the BLNR decides to accept the FEIS or renew the lease, we ask that the BLNR write into the lease language that guarantees the Military will do the following and holds them accountable to do so:

1. **Ensure the military completely restores leased land.**
2. **Provide fair compensation for leased land.**
3. **Provide reasonable access to Native Hawaiians for cultural practices.**
4. **Provide enhancements to the surrounding environment and communities.**

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

We 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.

Founded in 1964, the Prince Kuhio Hawaiian Civic Club (PKHCC) was established to promote the education and social welfare of people of Hawaiian ancestry. Its objectives include supporting high ethical standards in business, industry, and professional fields.

PKHCC urges the board to please *reject* the FEIS put forward in Agenda Item D-1.

Mahalo for your attention and consideration.

Me ke aloha,

Norman Llanos
Pelekikena
president@pkhcc.org

From: [Haumea Lucas](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Haumea Lucas Testimony
Date: Wednesday, May 7, 2025 9:17:12 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,
Haumea Lucas

Lāhainā, Maui

From: [Thaxton Lukela](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Re: The Acceptance or Non-Acceptance of the (EIS) for the Pōhakuloa Training Area on the May 9th agenda
Date: Wednesday, May 7, 2025 8:49:49 PM

I oppose and reject the acceptance of the EIS for the Pohakuloa Training Area. The us army and every other branch of the us military has repeatedly shown through history, an inability to honestly and properly manage any and all past (and future) promises/directives and has proven to be a very incompetent government entity. In other words, anything under the title: "united states" is already WRONG, DISHONEST AND UNTRUSTWORTHY.

Thaxton Lukela
Pauline Lukela

From: [Allison Lum](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa EIS
Date: Wednesday, May 7, 2025 5:09:56 PM
Attachments: [Pōhakuloa EIS Testimony Template.docx](#)

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: Allison Lum

Date: May 7, 2025

Aloha Chairperson and Members of the Board,

My name is Allison Lum, 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.

Allison Lum

From: [Ilima-Lei Macfarlane](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Urging BLNR to Reject the EIS
Date: Wednesday, May 7, 2025 8:04:29 PM

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

My name is Ilima-Lei Macfarlane. I was born and raised on the island of O‘ahu, and I am a proud Native-Hawaiian woman who cares deeply for this ‘āina and for the generations that will come after us.

I’m writing to urge you from the deepest part of my being: Please reject the Army’s Final Environmental Impact Statement.

For far too long, our lands have been taken, bombed, polluted, and left to die at the hands of the military. Look at what’s been done to Kaho‘olawe and Mākua Valley—our sacred lands turned into war zones. Even after decades of damage, they still haven’t been restored or made safe. The military has a long track record of destruction, and an even longer one of refusing to clean up after itself.

But this harm isn’t just to the land. It’s to the people—especially Native-Hawaiian women.

Wherever military presence expands, so does violence against Indigenous women. Native-Hawaiian women have experienced increased rates of sexual violence, exploitation, and trafficking in the shadows of military bases. We’ve become collateral damage in the name of “training.” This EIS doesn’t speak to that. It doesn’t speak to the trauma we carry, the lives impacted, or the communities that have been fractured. Our voices, our stories, and our truths have been left out—again.

We never consented to this. And we’re done being ignored.

As a kanaka woman, as a protector of this land, and as someone who wants nothing more than for my future keiki to see a demilitarized Hawai‘i, I am asking you—do what is pono. Reject this EIS. Do not allow further desecration under the name of military necessity. Stand with the people. Stand with our wāhine. Stand with the ‘āina.

Sincerely,
Ilima-Lei Macfarlane | Founder
Nā Wahine Toa Foundation

From: [Bryzon Maesaka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in opposition to the approval of the Army's FEIS, Meeting Item D-1, 5-9-25
Date: Wednesday, May 7, 2025 5:27:07 PM

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

My name is Bryzon Maesaka. I am from Wai'anae Moku, and I am writing to express my strong opposition to the approval of the Army's Final Environmental Impact Statement (FEIS) for the Pōhakuloa Training Area (PTA).

Pōhakuloa is not just any place—it is a wahi pana and wahi kūpuna, a sacred, ancestral place. It is home to irreplaceable Native Hawaiian cultural sites and some of Hawaii's most endangered species. The Army has already admitted to widespread contamination, not just in Pōhakuloa, but anywhere they have touched in Hawai'i, including **Makua Valley**, my community's piko. Similarly, the Army cannot prove that this contamination has not spread into water or ecosystems—the army gatekeeps this information, as well as any safety procedures or spill data. They also delete critical information from their FEIS and other public access record(s). Fires, endangered species, and climate harms have been dismissed without evidence, and the FEIS they have submitted evades Hawaii law by ignoring very obvious cumulative impacts.

The approval of this FEIS does not reflect the will of Native Hawaiians, the traditional custodians of this land, and does not reflect your constitutional responsibility to the public trust of the water that feeds and provides for Hawai'i. In *Kahaulelio v. DLNR* in 2019, the state of Hawaii has already been proven to breach its constitutional trust duty by failing to reasonably monitor and inspect trust lands at Pōhakuloa leased to the US military, failing to ensure compliance with cleanup and safety provision, failing to take action after learning of possible contamination, and failing to document efforts and provide transparency to the public. Ultimately, the potential approval of this FEIS does not reflect what is pono.

In today's political climate, where science is being dismissed daily, where federal dollars are being pulled based on wrongful agendas, and where the very idea of 'āina protections are being booted daily, I urge you to be on the right side of history. It is unacceptable and wrong that anyone gets to flit around laws and regulations that were created to protect our 'āina. These safeguards exist for a reason. Demand the Army clean up their mess, and rightfully restore the land to its natural state to begin a much-needed process of healing and restoration.

Thank you for considering my testimony in your final decision, and allowing me to use my voice on this important matter.

Ke aloha 'āina,

Bryzon Maesaka

From: [Elaine SanJose](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 6:32:44 PM

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

My name is Elaine Poipe Keali‘iwahāmanā and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1.

As a Lāhui ‘Ōiwi/ Kanaka Maoli (of blood/natives) & it's Lāhui Hawai‘i (Hawaiian subjects), have long borne a disproportionate burden in watching Pōhakuloa's sacred ‘āina be bombed, poisoned, and desecrated - for generations. My ‘ohana (family) and I live in the 10 mile radius eastward of Pōhakuloa Training Area. West winds that flow through these ‘āina does blow the toxic particles to our ‘āina located at the old Humu‘ula Sheep Station aka Humu‘ula Ka‘la‘i‘eha Ranch where we lay our heads to rest.

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

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

Mahalo nui for the opportunity to testify.

Me ke aloha pumehana,

Elaine Poipe Keali‘iwahāmanā Makai‘o- SanJose

P.O.Box 6329
Hilo, Hawai‘i O Keawe
96720-5226

(808) 747-1048

humuularanch1847@gmail.com

From: [esanjose](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 6:49:04 PM

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

My name is Elaine Poipe Keali‘iwahāmanā and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1.

As a Lāhui ‘Ōiwi/ Kanaka Maoli (of blood/natives) & it's Lāhui Hawai‘i (Hawaiian subjects), have long borne a disproportionate burden in watching Pōhakuloa's sacred ‘āina be bombed, poisoned, and desecrated - for generations. My ‘ohana (family) and I live in the 10 mile radius Eastward of Pōhakuloa Training Area. West winds that flow through these ‘āina does blow the toxic particles to our ‘āina located at the old Humu‘ula Sheep Station aka Humu‘ula Ka‘la‘i‘eha Ranch where we lay our heads to rest.

The US Congress itself, in the 1993 Apology Resolution, recognized the intrinsic and unique relationship between the well-being of the Hawaiian people and their connection to ‘āina. Yet the FEIS fails to account for the deep psychological, spiritual, and physical harms that will continue to be borne by the Lāhui ‘Ōiwi/ Kanaka Maoli (of blood/natives) & it's Lāhui Hawai‘i (Hawaiian subjects), in particular, should their demands for justice, healing, and reconnection with ancestral (and illegally stolen) ‘āina at Pōhakuloa be ignored for another 65 years or longer.

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

Mahalo nui for the opportunity to testify.

Me ke aloha pumehana,

Elaine Poipe Keali‘iwahāmanā Makai‘o-SanJose

Residence:
38-250 Mauna Kea Ala Hawai‘i O Keawe, Ko Hawai‘i Pae ‘Āinapuni‘ole 96720

Mailing: P.O. Box 6329
Hilo, Hawai‘i 96720

(808)-747-1048

epkmsj@gmail.com

From: [Paola](#)
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 8:43:09 PM

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,

Paola Makani

Honaunau, Big Island

From: [Misha Maldonado](#)
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 5:43:20 PM

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.

My name is Misha Maldonado, and I send this statement on behalf of myself, my children, and their future generation.

Me ka ‘oia‘i‘o,

Misha Michael Kehaulani Maldonado
Wai'anae, O'ahu
808-780-3888

From: [Lanakila Mangauil](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Wednesday, May 7, 2025 9:08:28 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**.

As a kanaka maoli, as a kama 'āina, as a kia'i mauna, as a kumu hula, as a human being! I full heartedly demand the End of the militaries assault upon my ancestral homeland! This is a direct attack on kanaka maoli and our ohana that is the lands, the trees and animals in the heart of our island. This is also a constant threat to the waters of our island, and to the minds and hearts of our people, of our whole island community.

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,
Joshua Lanakila o Ka 'Āina I Ka Pono Mangauil
Honoka'a, Hawai'i Moku

From: [Malia Marquez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Fwd: Pōhakuloa agenda item D-1
Date: Wednesday, May 7, 2025 7:11:33 PM

Re-sending with agenda item.

----- Forwarded message -----

From: **Malia Marquez** <maliamarquez71@gmail.com>
Date: Tue, May 6, 2025, 1:33 PM
Subject: Pōhakuloa
To: <blnr.testimony@hawaii.gov>

Aloha Kākou,

Im writing to you to ask you, the BLNR, our Board that should be protecting our LAND and NATURAL resources to REJECT the Army's final Environmental Impact Statement.

They have been bombing our 'āina, our Earth Papa for over SEVENTY years!?!? And what's makes it even worse (as if ANY thing could be worse than that), the Army doesn't even clean up their ordinances! They have created detrimental impacts on our 'āina, our Pōhakuloa, by contaminating our wai and our lands.

How much more are we going to allow? Enough is enough. We don't owe the army anything! It's actually the opposite. They owe Hawai'i for all of the destruction, desecration and harm that they've done on numerous islands.

Please do the PONO thing. Do what ANY steward of our land would do and protect our 'āina and natural resources! To do ANY thing other than protect Pōhakuloa would be careless and pono'ole.

Please protect and help Pōhakuloa, these lands that have been abused for far too long. Mahalo for your time on this extremely sensitive and important issue.

Me ka ha'aha'a,
Malia Lum-Kawaihoa Marquez

From: [KITTY MARTIN](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT FAULTY E.I.S.
Date: Wednesday, May 7, 2025 8:49:39 PM

It is unconscionable that this government would accept such an incomplete E.I.S. , thereby putting thousands of human beings at risk on the Big Island. For money.

Please REJECT this manipulation !

Kathryn Martin
13-6274 Kapoho Kalapana Bch Rd
Pahoa HI 96778

From: [DaKine](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1" in your subject line
Date: Wednesday, May 7, 2025 7:09:45 PM

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

My name is Jason Marvel 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,
Jason Marvel

From: [Milani Maybin](#)
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 8:31:14 PM

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

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.

Respectfully,

Milani Luning
Kailua, O'ahu
Milanimaybin@gmail.com

From: [Ashlie McGuire](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] We demand BLNR to reject the US army's Pōhakuloa FEIS
Date: Wednesday, May 7, 2025 9:40:11 PM

Aloha,

My name is Ashlie McGuire and I am a longtime resident of Hawai'i. I spent my childhood on the beaches of Kihei, Maui looking at Kaho'olawe. I saw the desecration that had been caused by the U.S. military and their bombing practice. I heard the stories from the earlier generations about how they watched the bombs fall. This land is sacred to the Hawaiians, so the act of even using artillery and bombs here is desecration and deplorable. This land is also home to a multitude of diverse flora and fauna that exist no where else in the world, and should be heavily protected. The FEIS fails to meet the basic requirements of Hawaiis environmental review laws, and does not provide the public or this Board with the information needed to make an informed and lawful decision. There is missing information about the human and environmental safety concerns, clear evidence of toxic contamination with no plans to clean it up, and failure to conduct proper testing in groundwater despite knowing this contamination exists and poses potential health hazards. With the ongoing fire hazards this poses, among so many other problems, this is and has clearly been a problem for a long time. The Army's FEIS should be rejected and frankly their lease should be terminated. This is unwanted and downright dangerous. The FEIS does not meet the legal or ethical standards for protecting Hawaii's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept this FEIS with so many critical issues. I ask you you 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. Better yet have them do all of this and then have them LEAVE. Demilitarization of Hawai'i is our only safe path forward in the face of climate change.

Sincerely,
Ashlie McGuire
Ka'ū, Hawaiiinui

Board of Land and Natural Resources
Kalanimoku Building
1151 Punchbowl Street
Honolulu, HI 96813

RE: Decision-Making Regarding Final EIS for Pōhakuloa

May 9, 2025

Aloha mai kākou,

Mai ka pi‘ina a ka lā puka i Ha‘eha‘e a i ka mole ‘olu ‘o Lehua,‘ano‘ai kākou.

There is a deep, familial connection between the land and the people who live on it intrinsically woven into the histories and genealogies of Native Hawaiians. We see this pilina (relationship) in oral traditions as early as the Kumulipo, one of Hawai‘i’s foremost cosmogonic genealogies, and mo‘olelo (story) of Hāloanakalaukapalili, the first kalo plant and the elder sibling of all Native Hawaiians. In order to protect and preserve this connection to the land, the Council for Native Hawaiian Advancement expresses our **strong support for the Non-Acceptance of the Final Environmental Impact Statement (FEIS) for the Army Training Land Retention at Pōhakuloa Training Area.**

The FEIS for the United States Army’s lease at Pōhakuloa does not inspire confidence that the U.S. Army has the means or desire to protect and preserve these places of cultural, historical, and biological significance. 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.

This is not the first nor the last time we must negotiate for the proper stewardship of our land. The U.S. military’s failure of restoration and cleanup at Kaho‘olawe and Kalaeloa has created a dubious record for itself. This ongoing record leads us to believe that they are disinterested in, or incapable of, stewarding such an important piece of cultural, historical, and biological significance. BLNR should move forward with the non-acceptance for its land lease at Pōhakuloa.

E mālama,

Madelyn McKeague
Director of Advocacy, CNHA

From: [Sandra McLagan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please reject the army's EIS
Date: Wednesday, May 7, 2025 9:11:25 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,
Sandra McLagan
Kailua, Oahu

From: ainaulufarms@yahoo.com
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 8:07:21 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,
Jeffrey Michael
Lahaina Maui

Aloha.

Jeffrey

From: aliwritesfunny@icloud.com
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to Approval of Final EIS for Pōhakuloa Training Area Land Retention
Date: Wednesday, May 7, 2025 4:14:12 PM

Dear Chairperson and Members of the Board of Land and Natural Resources,

I am writing to express my strong opposition to the approval of the Final Environmental Impact Statement (EIS) concerning the U.S. Army's proposal to retain approximately 19,700 acres of state-owned land at the Pōhakuloa Training Area (PTA) on Hawai'i Island.

The PTA encompasses a unique and fragile ecosystem, home to endangered species such as the Hawaiian nēnē goose and the hoary bat. Continued military training activities have historically led to environmental degradation, including wildfires and habitat destruction.

Moreover, the land holds significant cultural and historical importance to Native Hawaiians. The ongoing military use has disrupted access to sacred sites and has been a source of cultural and spiritual distress for the local communities.

Given these concerns, I urge the Board to:

1. Deny approval of the Final EIS until a comprehensive and independent assessment of the environmental and cultural impacts is conducted.
2. Ensure meaningful consultation with Native Hawaiian organizations and cultural practitioners to address longstanding grievances and to incorporate traditional knowledge into land management decisions.
3. Explore alternative land uses that prioritize conservation, cultural preservation, and sustainable community development over continued military occupation.

The stewardship of Hawai'i's natural and cultural resources is a responsibility that must be approached with the utmost care and respect. I implore the Board to consider the long-term implications of this decision and to act in the best interests of the land and its people.

Mahalo for your attention to this critical matter.

Sincerely,

Ali Miller

aliwritesfunny@icloud.com

From: [Alex Miller](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] testimony supporting rejection of the US Army's EIS for Pohakuloa
Date: Wednesday, May 7, 2025 7:39:42 PM

To whom it may concern:

My name is Alex Miller, I am a resident of Hawai'i. I am writing to urge the BLNR to REJECT the US Army's Final EIS for Pohakuloa Training Area.

The US Army has proven time and again that they are not responsible or safe stewards of the land in Hawai'i. From Kaho'olawe to Makua to Red Hill, the US Armed Forces have continued to desecrate sacred places, cause harm to Hawai'i residents, and endanger the fragile ecosystem. They have no plans to clean up any land they have destroyed or used for target practice in the past. We simply cannot trust them with further "stewardship" for any land in Hawai'i as they have proven that they will mislead and lie to the public and government agencies to hide the severity of their contamination and destruction of our resources and land.

Furthermore, the Army does not and has never had the consent of Native Hawaiians to occupy the land at Pohakuloa or use it for military exercises. Pohakuloa is land meant to be held in trust for Native Hawaiians, not used to further the US war machine.

I strongly urge you to REJECT the Army's final EIS.

Mahalo,
Alex Miller

From: [Chanda Min](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, May 7, 2025 9:17:49 PM

There is no way to justify another 65 years of bombing and desecration. The Army's FEIS is incomplete and unacceptable. Reject Agenda Item D-1 now.

Please stop the bombing.

Mahalo,
Chanda Min

From: [Mareva Minerbi](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Insufficient FEIS in item D1
Date: Wednesday, May 7, 2025 11:59:25 PM

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

I respectfully urge you to **reject the Army's insufficient FEIS in item D1** 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

Please **reject the FEIS put forward in Agenda Item D1.**

Sincerely,
Mareva Minerbi

From: [Camille Monson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Agenda Item D - 1
Date: Wednesday, May 7, 2025 8:37:28 PM

Aloha Department of Land and Natural Resources,

The FEIS fails to analyze environmental impacts on federal lands, which are integral to the proposed lease retention. This violates the intent of Hawai'i's environmental policy laws, which require full and integrated disclosure. I urge you to reject Agenda Item D-1.

Mahalo,

Camille Monson

From: [Kupuna Moopuna](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [Kupuna Moopuna](#)
Subject: [EXTERNAL] BLNR Meeting May 9, 2025 - Testimony for Agenda Item D-1: REJECT
Date: Wednesday, May 7, 2025 7:51:48 PM

Kūpuna for the Mo'opuna

committed to the well-being of Hawai'i for the next generations to come

kupuna4moopuna@gmail.com

Meeting of the Board of Land and Natural Resources

DATE: May 9, 2025

TIME: 9:00 a.m.

PLACE: DLNR Boardroom, Kalanimoku Bldg

"Testimony for Agenda Item D-1"

REJECT the Clearly Insufficient FEIS in Item D-1

Aloha,

We, Kūpuna for the Mo'opuna, a hui of Hawaiian Homes Commission Act kūpuna beneficiary farmers from Pana'ewa, Hawai'i, urge the Board of Land and Natural Resources to **REJECT THE CLEARLY INSUFFICIENT FINAL ENVIRONMENTAL IMPACT STATEMENT IN ITEM D-1.**

Born and raised on the Island of Hawai'i, we have first-hand experience with the deep psychological, spiritual, and physical harm inflicted upon the community, especially the Native Hawaiian community. We have suffered, and will continue to suffer, should our demands for justice, healing, and reconnection with ancestral and illegally stolen 'āina at Pōhakuloa be ignored for another 65 years or longer. Hewa!

To ensure that the Army fully accounts for the harms it has and will continue to inflict on Hawai'i and her people with its "retention" proposal, **please reject this FEIS.**

~Kūpuna for the Mo'opuna
Pana'ewa, Hawai'i

From: [Alfredo Moreno](#)
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 9:39:20 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,

Alfredo Moreno

Keaau, HI.

Disabled Veteran,
Wounded Warrior

808-229-8713

From: [Jeffrey Moreno](#)
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 5:41:37 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,

Jeffrey Moreno

Kilauea, Kaua‘i

Kanaka Maoli / Maori / Cultural Practitioner

Phone Number: (808)482-9844

Email: thejeffersonexperience@gmail.com

From: [Krystina Morse](#)
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 6:03:51 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 'ōia'i'o,
Krystina, Morse

From: [Lipine Muraki](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa - Army's final EIS
Date: Wednesday, May 7, 2025 7:56:47 PM

To the Board of Land and Natural Resources,

I urge you to please **reject** the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. This environmental review is inadequate. It is missing key information, including biological and cultural surveys; ignores impacts to adjacent federal lands, a clear requirement under state law; turns a blind eye to threats to endangered species and their habitats, impacts to cultural resources and practices, and even the risk of aquifer contamination; and fails to fully describe alternative uses of the leased areas that could serve the public interest. The EIS fails to disclose the degree to which munitions continue to litter public land. The Department of Land and Natural Resources staff submittal itself calls out the Army for repeatedly refusing to address their concerns throughout the EIS process. We are asking the BLNR to stand by its staff, the community, and its mission and reject this poorly written, incomplete, and seemingly bad-faith attempt to disregard Hawai'i's Environmental Protection Act.

Mahalo nui,
Lipine Muraki-Griffin

From: [Chloe Murphy](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa Testimony
Date: Wednesday, May 7, 2025 8:09:19 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,

Chloe Murphy

Pūpūkea, O'ahu

This message is the property of Kamehameha Schools 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 Kamehameha Schools at webmaster@ksbe.edu and then delete this message from your system.

From: [Brent Nagami](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 7:44:29 PM

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

My name is Brent Nagami and I am from Mililani, 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.

Mahalo nui for the opportunity to testify.

Sincerely,

Brent Nagami

From: [Uilani Naipo](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [U'ilani Naipo](#)
Subject: [EXTERNAL] Agenda D-1
Date: Wednesday, May 7, 2025 9:04:58 PM

Aloha e Chair Chang and The Board of Land and Natural Resources,

‘O wau ‘o U‘ilani Naipo no Moku o Keawe. I request you NOT ACCEPT the Final EIS for agenda item D-1.

*With the feedback from DLNR’s Divisions regarding the deficiency of the EIS along with the noted concerns of significant threats to endangered native birds and wildlife, iwi kūpuna, and historical sites, there is no choice but only thing to do in order to uphold your mission (to) enhance, protect, conserve and manage Hawaii’s unique and limited natural, cultural and historic resources. That one thing is to **REJECT the FEIS,!***

I hope the Board has been or will be afforded a cultural and environmental visit to Pōhakuloa to ‘ike maka the concerns of the Divisions and the many who are testifying.

He kauā ha‘aha‘a wale nō,

U‘ilani Naipo

Moku o Keawe

From: [Jessica Nakamura](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: BLNR MUST REJECT the U.S. Army's Pohakuloa FEIS
Date: Wednesday, May 7, 2025 6:14:05 PM

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

I strongly urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army regarding its proposed continued abuse of 22,750 acres of public trust land at the Pōhakuloa Training Area (PTA) on Hawai‘i Island.

The FEIS fails to meet fundamental requirements under Hawai‘i’s environmental laws. Instead of addressing the serious concerns raised by the community and experts during the draft review process, this final version falls short—raising new alarms while ignoring or sidestepping essential questions:

- The Army has confirmed toxic contamination on these state lands—including lead, arsenic, petroleum compounds, and other harmful substances—with no concrete plan or timeline for clean-up.
- Despite the clear threat of contamination spreading through highly permeable soils and shallow groundwater systems, comprehensive testing still has not been done.
- The Army continues to withhold its Standard Operating Procedures, claiming they help prevent contamination, yet refusing to share them publicly.
- No meaningful assessment has been done on potential health impacts—particularly for nearby residents and cultural practitioners who may be exposed through air, water, or soil.
- The analysis deliberately avoids looking at the full environmental impact of PTA’s 132,000-acre footprint, fragmenting the review in a way that undercuts accountability.
- Military activities have sparked over 1,000 wildfires since 1975, posing a major threat to native ecosystems, including endangered species like the Palila.
- The climate impacts are glossed over, with incomplete greenhouse gas data and unsubstantiated claims about emissions reductions.

This document falls far short of the legal and ethical standards that should guide our decisions about land stewardship. Accepting this FEIS would not only ignore those standards—it would endanger the land, the water, and the communities that depend on them.

We have already seen, with examples like Kaho’olawe, how it takes generations to restore the damage the U.S. military so carelessly inflicts on our ‘aina. We already know that the ones who should be making decisions about what happens with Hawai‘i’s land and resources are kanaka maoli, who preserved and protected these islands for centuries and who still fight to protect them today. We already know that Indigenous stewardship of land and resources has overwhelmingly positive effects for the environment and for the people who live in that environment. We should not have to keep rehashing these basic principles.

Mahalo for your time and accepting your kuleana to protect Hawai‘i from those who would

continue to harm and exploit.

Sincerely,
Jessica Nakamura
Kahului, Maui
jessinaka21@gmail.com

From: [Ila Nako](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D-1 Acceptance/Non-Acceptance of FEIS
Date: Wednesday, May 7, 2025 7:48:57 PM

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

‘O Ila Pohaikealohaikaleihulu Nako ko‘u inoa. He keiki o nā kuahiwi mākolukolu o Hawai‘inui. 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.

Me ka ha‘aha‘a,
Ila P. Nako

From: [Christina Navoa-Auza \(2028\)](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Wednesday, May 7, 2025 6:37:27 PM

BLNR Military Leases Testimony

Mai Kalihi no au ka ‘āina o ka makani Haupe‘epe‘e a me ka ua Po‘olipilipi, ano ‘ai kakou, ‘O Kilikina Navoa-Auza ko‘u inoa. I come from the ahupua‘a of Kalihi and my wind is Haupe‘epe‘e along with my rain Po‘olipilipi. I am a Native Hawaiian haumana (student) attending Hālau Kū Māna New Century Public Charter School. As a Native Hawaiian haumana in Hawai‘i, I have the kuleana to fight for the rights of our people, whether that fight be big or small

In many of our classes here, we are privileged to be immersed in our Hawaiian culture and modern-day issues, such as this new issue that has come to the attention of our 9th-grade papa (Class). This issue being the BLNR Military lease from many resources, I can understand that the U.S Military has a lease on Pohakūloa on Hawai‘i Island, and your lease will soon run short. By looking at the Final Environmental Impact Statement, you had put out from my perspective, I feel that you don’t understand what ‘āina is and ‘āina is living, breathing person, we must persevere for her as much as we can, so you now that you have used her for four years and I am 100% sure your request shouldn't be renewed. This ‘āina that you are occupying holds special meaning within Hawaiians. Pōhakuloa is known as sacred land where our ancestors once roamed and still roam to this day. This ‘āina that seems to mean so much to you guys (U.S Military) you aren’t even taking the time to malama her. You guys don’t see the communities you are affecting and the generation after and now that will have to live with this hewa. Remember the quote, He wa‘a he moku, he moku he wa‘a which means what we have is limited and to think of everything as your last. We are only limited to this beautiful ‘āina we live on today and the more we let issues like this happen the more we let the people we look down on us win and we can’t let them win. So I urge you the people in front of me to stand up for what’s right and to the people who claim to have our best interest in mind to actually do something about it this isn’t about money this is about the people.

From: [Kelsey Oliver](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa testimony
Date: Wednesday, May 7, 2025 8:53:20 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,
Kelsey Oliver, PhD
Honolulu, Oahu



Kelsey Oliver, Ph.D., BCBA (she/her)

Assistant Professor

Department of Special Education

[Kelsey Oliver's Zoom Room](#)

Respecting the 'āina (land) we gather upon, I acknowledge the 'āina of Wist Hall in Pa'akea, in the ahupua'a of Mānoa. This territory is revered by Native Hawaiian/kanaka maoli/kanaka as Papahānaumoku, their ancestral grandmother. I recognize Queen Lili'uokalani's sacrifice, yielding Hawaiian lands under duress. Hawai'i remains an illegally occupied state of America.

From: [Sherina Ong](#)
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 7:14:52 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 resident of Hawai'i 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,
Sherina Ong
Captain Cook, Big Island

From: [Jamaica Osorio](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] "Testimony for Agenda Item D-1"
Date: Wednesday, May 7, 2025 5:19:56 PM

Aloha Chair Chang and Members of the Board,

My name is Jamaica Osorio, and I am a member of **Hui Aloha 'Āina o Honolulu**. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

The most egregious failures of the FEIS 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 'oia'i'o,

Dr. Jamaica H Osorio

Associate Professor of Indigenous & Native Hawaiian Politics

Wahiawa, HI

Member of Hui Aloha 'Āina o Honolulu

From: [Malia Osorio](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Final EIS Statement re: Pōhakuloa Training Area (PTA)
Date: Wednesday, May 7, 2025 6:01:36 PM

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

Date: May 7, 2025

Aloha Chair Chang and Members of the Board,

My name is Malia Osorio and I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

The most egregious failures of the FEIS 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 'oia'i'o,
Malia Osorio
Wahiawā, O'ahu

From: [Cassandra NM Park](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT Army EIS for Pohakuloa
Date: Wednesday, May 7, 2025 7:23:50 PM

Aloha BLNR Board Members,

I am writing to you to request that the Board of Land and Natural Resources REJECT the Army's EIS for the Pohakuloa Training Area. I ask you to reject this as a Native Hawaiian and as a PhD in Public Health student. From a Hawaiian worldview we know that human health is directly tied to the health of the land. The Army has not acted in good faith on behalf of the neither the people nor the land of the area.

I ask that you allow Pohakuloa to heal once again so that future generations can care for the land as our ancestors once did.

Mahalo nui,
Leihua Park

From: [Kimberly Patterson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to U.S. Army's EIS and Continued Desecration of Pōhakuloa Training Area Submitted by: KIMBERLY PATTERSON
Date: Wednesday, May 7, 2025 8:37:47 PM

Aloha mai kākou,

My name is Kimberly Patterson, and I am writing to strongly urge the Board of Land and Natural Resources to reject the U.S. Army's Environmental Impact Statement (EIS) and deny the continuation of any military lease at Pōhakuloa. As a resident of Hawai'i, a Hawaiian, a teacher, and a steward of this 'Āina, I speak out with deep concern and kuleana for what has occurred—and continues to occur—at Pōhakuloa.

For decades, the Army has used Pōhakuloa as a training ground, a bombing range, and a dumping site for weapons and toxic waste. What they have left in their wake is irreversible damage to sacred lands, endangered species habitats, and the integrity of Native Hawaiian culture and history. The desecration of iwi kūpuna, the contamination of soil and water, and the disruption of ecosystems show clear and sustained abuse of the land. No EIS can mask the truth: the Army has failed to uphold its legal and moral responsibility to mālama 'Āina.

Let us be clear: Pōhakuloa is not just vacant land or military real estate. It is a sacred wahi pana, a living temple, holding centuries of ancestral memory and spiritual importance to the Kanaka 'Ōiwi. To extend the lease would be to further violate our Constitution, which mandates the protection of ceded lands for the benefit of Hawai'i's people. It would also ignore court rulings requiring proper stewardship. The Army's track record shows they are not capable of honoring or protecting this land.

We must draw a line. Enough is enough. I respectfully demand that the BLNR do its duty to protect our public trust lands by rejecting the Army's EIS and ending the military's access to Pōhakuloa. Let us begin the healing process by returning the land to a place of peace, restoration, and respect.

Ua lehulehu a manomano ka 'ikena a ka Hawai'i.

The wisdom of the Hawaiian people is great and vast.

Let that wisdom guide your decision.

Mahalo nui for your time and consideration.

Kimberly Patterson
High School Language Arts Teacher
Hawaiian Studies Advisor
Driver's Education Instructor and
Driver Education Coordinator
Hawaii Academy of Arts & Science PCS
15-1397 Homestead Rd., Pahoa, HI 96778
PO Box 1494, Pahoa, HI 96778
(808) 965-3730 (808) 965-3733fax (808) 557-4269 cell

kpatterson@haaspcs.net

DRIVER'S ED WEBSITE:

<https://sites.google.com/haaspcs.net/haas-de-courseinfo/home?authuser=2>

"He pūnāwai kahe wale ke aloha"

Love is a spring that flows freely.

Love is without bounds and exists for all.

From: [Sydney Patterson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: We Demand BLNR to Reject the U.S. Army's Pohakuloa FEIS
Date: Wednesday, May 7, 2025 9:24:03 PM

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

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

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

Key issues that warrant immediate rejection include:

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

This FEIS does not meet the legal or ethical standards for protecting Hawai‘i's lands, waters, ecosystems, or communities. Accepting the FEIS would be detrimental to our community and the future of our home.

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

Sincerely,
Sydney Patterson
sydneykpatterson01@hawaii.rr.com

From: [Wren Patton](#)
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 6:30:48 PM

Dear BLNR Members -

My name is Wren Patton, 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,

Wren Patton
Honolulu, Hawaii

From: [Patrick Pua](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 4:23:19 PM

Submitted by: Patrick Pua
Date: 5/7/2025

Aloha Chairperson and Members of the Board,

My name is Patrick Pua and 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.

Patrick Pua

From: [Makalapua Pelletier](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa
Date: Wednesday, May 7, 2025 7:38:44 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 to 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,
Makalapua 'Alohilani Pelletier
Mililani, Hawai'i

From: [Mari Quinn](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 9:30:59 PM

Aloha Chair Chang and Members of the Board,

My name is Mariko Quinn, and I am a member of **Hui Aloha 'Āina o Honolulu**. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

The most egregious failures of the FEIS 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,

Mariko Quinn
He'eia, O'ahu

From: [Elizabeth Rago](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's final EIS
Date: Wednesday, May 7, 2025 4:44:59 PM

Aloha,

My name is Elizabeth Rago, a resident of Kahuku, HI.

I'm writing to urge the BLNR to please reject the EIS submitted for Puhakuloa. The US Army has failed to care for this land and continue to harm the land and her Hawaiian peoples.

Please consider this and other voices opposing the EIS.

Thank you.

Respectfully,

Elizabeth J. Rago

CONFIDENTIALITY NOTICE:

This communication may contain CONFIDENTIAL and PRIVILEGED information for the sole use of the intended recipient(s). Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient (or authorized to receive on behalf of the recipient), please contact the sender by reply E-MAIL and delete all copies of this message. Thank you.

From: [Rustin R](#)
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 4:46:33 PM

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,
Rustin Raquino
Wahiawa, Oahu
rraqui989@gmail.com

From: [Carmela Resuma](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's EIS of Pōhakuloa
Date: Wednesday, May 7, 2025 8:33:46 PM

Dear BLNR Leadership,

I implore you to reject the Army's final EIS of Pōhakuloa. The bombing desecrates the 'āina, causes environmental harm, and contaminates our water. There is no justification for these actions.

Please reject the EIS.

Mahalo,

Carmela Resuma

O'ahu Resident

From: [Hulali Reyes](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testifying on item D-1
Date: Wednesday, May 7, 2025 5:13:11 PM

*Aloha 'o Hulali Reyes ko'u inoa,
I respectfully submit this testimony to ask that you reject the FEIS for the
continued military use of Pohakuloa. This document does not meet
environmental, legal, or ethical standards expected in our state.*

From: [Ikaika Reyes](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testifying on item D-1
Date: Wednesday, May 7, 2025 5:17:36 PM

***Aloha my name is Ikaika Reyes.
I am a concerned citizen writing in opposition to Agenda Item D-1.
The Army's failure to consult 'Aha Moku or conduct meaningful
analysis of cultural impacts is reason enough to reject the FEIS.
Mahalo***

From: [Kiana Reyes](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testifying on item D-1
Date: Wednesday, May 7, 2025 3:58:24 PM

Aloha my name is Kiana Reyes.

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 Capital EIS.

Mahalo,

Kiana K. Reyes
Business Owner
(808)727-9764

Kanu Aloha
111 Pueo Drive
Kula, HI 96790
kiana87maui@gmail.com
www.kanualoha.org

From: [Jennifer Riordan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for 5/9/25 meeting
Date: Wednesday, May 7, 2025 9:15:46 PM

Aloha e Chair and Board Members of BLNR,

My name is Jennifer Riordan, and I am submitting this testimony as a concerned Native Hawaiian and resident of Hawai‘i island. I respectfully urge the Board **not to accept the U.S. Army's Environmental Impact Statement (EIS)** for the retention of State lands at Pōhakuloa or other military training areas.

The EIS fails to adequately address the significant and long-standing harm that military use has caused to Hawai‘i’s land, water, and cultural resources. It also does not provide a clear, enforceable path to environmental justice or restoration. The cumulative impacts of decades of live-fire training, unexploded ordnance, and toxic contamination—especially on lands like Pōhakuloa and Makua—cannot be overlooked or minimized. These are not just training grounds; they are sacred places with ecological, cultural, and historical significance.

The Army’s continued use of these lands perpetuates environmental degradation and disrespects the will of many community members who have voiced strong opposition over the years. The EIS inadequately considers alternative land uses, restoration plans, or meaningful community input. Instead, it reads as a justification for the status quo, which has already proven harmful to both the ‘āina and its people.

As stewards of Hawai‘i’s public lands, the BLNR has a responsibility to uphold the public trust and to prioritize the long-term health of our ecosystems and communities over military convenience. Accepting this EIS would set a dangerous precedent—one that signals disregard for both Native Hawaiian rights and environmental stewardship.

I urge you to reject the Army’s EIS and call instead for full cleanup, restoration, and the return of these lands to the people of Hawai‘i.

Mahalo for your time and for standing for the future of our islands.

Sincerely,

Jennifer Riordan

From: [Jade Rivera](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: We Demand BLNR to Reject the U.S. Army's Pohakuloa FEIS
Date: Wednesday, May 7, 2025 6:29:31 PM

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

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

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

Key issues that warrant immediate rejection include:

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

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

Sincerely,
Jade Rivera
Hilo, Hawai‘i

jadelarivera17@gmail.com

From: [Mario Rivera](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Wednesday, May 7, 2025 6:50:18 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 'oia'i'o,
[Mario Rivera]
[Hilo, Hawaii]
[Kanakanaka / Cultural Practitioner /
[8087563069]

Sent from my iPhone

From: [kuulei salzer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] NON-ACCEPTANCE: 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,
Date: Wednesday, May 7, 2025 8:50:19 PM

NON-ACCEPTANCE- Decision Making Regarding the Acceptance or Non-Acceptance of the Final EIS for the Army Training Land Retention at Pōhakuloa Training Area

DATE: May 7, 2025

POSITION: NON-ACCEPTANCE THE FINAL EIS

Aloha Chairperson and Members of the Board,

My name is Ku‘uleialohaonālani Salzer, and I strongly urge the Board of Land and Natural Resources to **reject** and to not accept the Final Environmental Impact Statement (EIS) for the Army’s proposed retention of approximately 23,000 acres of state land at the Pōhakuloa Training Area (PTA) on Hawai‘i Island.

The EIS does not sufficiently account for the cumulative impacts of over 70 years of military activity at PTA. Thousands of acres have already been degraded by live-fire training, unexploded ordnance, and contamination from hazardous materials. The lack of a comprehensive environmental remediation plan is unacceptable. Retaining this land without a clear, enforceable commitment to cleanup continues a legacy of environmental injustice.

We cannot ignore the painful lessons of Kaho‘olawe, where, decades after the bombing ceased, vast areas remain contaminated with unexploded ordnance. Despite the Navy’s promises to fully clean the island, only about 10% was cleared to a depth of four feet — leaving much of the land still dangerous and inaccessible. Accepting this EIS risks repeating that same failure at Pōhakuloa. We cannot allow another generation to inherit a poisoned and desecrated ‘āina, justified by the illusion of “temporary” military use.

The EIS gives insufficient weight to alternatives, including the option of **non-retention** or transition to peaceful, community-based land stewardship. A truly responsible EIS would investigate demilitarization pathways and prioritize community, conservation, and cultural use over continued militarization.

Accepting this EIS would be contrary to the principles enshrined in the Hawai‘i State Constitution, including the **public trust doctrine**, the protection of natural and cultural resources, and the duty to uphold Native Hawaiian rights. It also runs counter to the State’s climate goals and its commitment to mālama ‘āina (care for the land) and aloha ‘āina (love for the land).

As trustees of our land and natural resources, the BLNR must hold the Army accountable for its past and ongoing impacts. Acceptance of this EIS without genuine cleanup, restitution, and transition planning would amount to a rubber stamp on continued harm. We urge you to stand on the side of ‘āina, culture, and community, not destruction and militarization.

Pōhakuloa has given enough. The ‘āina and its people have borne the burden of military occupation for too long. It is time to return this sacred land to the care of its rightful stewards. Please, do not accept this EIS.

Mahalo for your time and consideration.

Me ke aloha,

Ku‘uleialohaonālani Salzer

From: [Sage Seibert](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Wednesday, May 7, 2025 8:45:27 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,
Sage Seibert
Honolulu, Oahu
Kanaka Maoli

From: [Leo Nahe Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda D-1 - Testimony for BLNR to Reject the Army's FEIS for Pōhakuloa
Date: Wednesday, May 7, 2025 7:41:56 PM

Aloha Board,

I am writing to urge you to REJECT the army's environmental impact statement. The EIS is far from adequate and paints an inaccurate picture of the impact that the US Army has had and continues to have on Pōhakuloa. The US Army has shown us time and time again that they are not good stewards of the 'āina.

Aside from the nearly 20,000 acres of 'āina that has been burned and damaged, amongst the grounds are many native flora and fauna that are directly in harm's way. There have also been zero efforts to clean the 'āina that the US Army has violently and belligerently desecrated. Clearly, the practices of the US Army do not comply with the conservation designation given the direct harm they are causing .

Enough is enough.

Do your part and reject this FEIS.

Mahalo,

Alexis Leo Nahenahemailani Smith
Wai'ehu, Maui

From: [Kanilea Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 6:49:52 PM

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

My name is Kanilea Smith and I am from Oahu. 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 disregards clear Hawai‘i law, fails to include necessary 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.

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

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 ā nui for the opportunity to testify.

Sincerely,

Kanilea Smith

From: [Madeline Sofranac](#)
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 4:47:27 PM

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 'oia'i'o,
Doctor Madeline Sofranac
Waimea, Moku o Keawe
PO Box 484
Kamuela, HI 96743

From: [Eha Souza](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, May 7, 2025 5:08:44 PM

Aloha mai kākou. Regarding Agenda Item D-1, I am alarmed that the Army has ignored Hawaiian law and refused to complete required surveys. This FEIS is unacceptable and must be rejected.

‘Ehā Souza

From: [Ishmael Stagner](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] ### OPPOSE EIS and renewal of leases
Date: Wednesday, May 7, 2025 4:15:21 PM

Aloha Mai Kakou:

My name is Carmael Stagner, a kanaka oiwi with roots in Mahukona.

This testimony is submitted in opposition to any and all further use of Pohakuloa by the United States military.

Please do not renew any leases that further destroys our ability to heal.

Instead, agree to restore the aina through the hiring of Hawaiians to practice our healing protocols as delineated in the 1978 Hawaii State Constitution Article XII, Section 7.

Pay reparations to the lineal descendants of the ahupuaa the military has destroyed.

Use your western methodologies and hire Hawaiians to make decisions about Pohakuloa. Provide us the infrastructure for housing, schooling and working the aina as is our birthright.

Mahalo Nunui,

Carmael K Stagner
(808) 673-0143

1065 Kawaiahao Street #1801
Honolulu, HI 96814

From: [Nohea Stoner](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Wednesday, May 7, 2025 6:12:22 PM

Aloha to the entirety of the Bureau of Land and Natural Resources department and to whomever else it may concern.

My name is Nohea Leilani Stoner Lecker. I am a native Hawaiian descendant & lifetime resident born and raised on the Eastside of the island of Maui. Hawai'i is my Home and it is mine as well as all of our kūleana to act and speak in her honor & to protect her at all costs. Our precious ecosystems that keep our world in optimal balance are being threatened and our lives as well as those who will come after us truly depend on it.

I am writing in regards to the event that will be taking place Friday, May 9th, concerning the Army's proposed lease renewal that would allow the US military to continue their intrusive training activities on the lands of Pōhakuloa for an additional 65 years. When I read the receipts of past damages done under their stewardship, there's not a bone in my body that believes they are deserving of such an extension. For example, when a hypothetical person repeatedly drives impaired, has gotten in a car accident or 2 under the influence and has proved to be a hazard to their environment & lives of those around them-it is not unreasonable to revoke that person's license privileges & access to those privileges.

This is my testimony urging BLNR to reject the Army's environmental impact statement on several grounds:

- 1) Inadequate Environmental & Cultural Impact Analysis.
- 2) There's no sufficient plan to mitigate impacts to cultural & natural resources.
- 3) Concerns about depleted Uranium on the site have gone unaddressed.
- 4) Military usage is incompatible with the conservation designation.
- 5) The approval of the EIS directly goes against BLNR's constitutional duty to mālama 'āina.

Pōhakuloa is a wahi pana. A sacred & storied site Home to irreplaceable Native Hawaiian cultural sites & some of the most endangered species. The Army has already burned 20,000 acres. Including designated critical habitats for native flora and fauna. That in which they still have not provided sufficient plans on mitigating or cleaning up the devastating mess they have already made.

It also goes to mention the Kahaulelio vs DLNR trial of 2019 where the Supreme Court found that the State of Hawaii had breached its constitutional trust duties by failing to :

- Reasonably monitor & inspect trust lands at Pōhakuloa leased to the U.S Military.
- Ensure compliance w cleanup & safety provisions detailed in that lease were being honored.
- take action after it was revealed that possible contamination & violations had occurred.
- Document efforts and provide transparency to the public.

Lastly, Depleted Uranium in the soil is overturned and aerosolized during live fire exercises and blown across the island. DU is linked to cancer and other negative health impacts.

The proposed usage of this site are incompatible with a conservation designation. Ongoing

live fire and bombing in the area threaten the native species and cultural resources of the area.

Once again I am urging BLNR to do what is pono and not put our precious Pōhakuloa in the hands of those who have dirtied her soil poisoned her waters and have no intent on cleaning up the damage already done

Mahalo nui for your time care and understanding.

Signed Nohea Leilani Stoner Lecker

From: [Okalani Tallett](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] In opposition of EIS for Pohakuloa training area
Date: Wednesday, May 7, 2025 4:36:39 PM

Aloha,

I am writing in opposition of the EIS for Pohakuloa Training area. The military has done nothing but cause fires, bombed our land, polluted water, cause irreversible damage to surrounding areas which included protected and in dangered animals and insects and caused damage to endemic habitats found no where else in the world. The military DOES NOT contribute or help Hawaiians or locals as the say they do but do just the opposite. Their ILLEGAL presence on this land is a statement to which the “are protecting us” is an insult!!! I oppose the EIS, the renewing OF ANY MILITARY LEASE and ask that they be removed from Hawai’i all together!!!

Mahalo,

Nolan Okalani Tallett

GT Evolution Homes/Capital

From: [Chaleia Tamashiro](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] No more desecration
Date: Wednesday, May 7, 2025 9:34:40 PM

Dear BLNR Leadership,

I implore you to reject the Army's final EIS of Pōhakuloa. The bombing desecrates the 'āina, causes environmental harm, and contaminates our water. There is no justification for these actions.

Please reject the EIS.

Mahalo,
Chaleia Tamashiro
O'ahu Resident

From: [Patti Tamura](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 8:19:34 PM

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

My name is Patti Tamura and I am from Honolulu, Hawaii. I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1.

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

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

Mahalo nui for the opportunity to testify.

Sincerely,

Patti Tamura

Patti



SIERRA CLUB OF HAWAI'I

Testimony to
Board of Land and Natural Resources

May 9, 2025

9:00 AM

Conference Room 132

Testimony on 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.

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

The Sierra Club of Hawai'i, on behalf of its over 20,000 members and supporters, urges you to **REJECT** the clearly deficient environmental impact statement (EIS) contemplating the Army's proposed "retention" of public and "ceded" lands it currently leases within the Pōhakuloa Training Area.

The Sierra Club of Hawai'i echoes the comments and concerns submitted by the Sierra Club Hawai'i Island Group, as well as that of Department of Land and Natural Resources staff, regarding the many deficiencies in the EIS before you today. These include the lack of analyses of secondary impacts such as those that may occur on federal lands – a basic requirement of the environmental review law; the lack of archaeological surveys and biological opinions needed to assess potential impacts to historic properties and endangered and native species; the lack of a good faith consideration of opposing views, particularly with regards to alternative uses of the currently leased lands and documented threats to endangered native wildlife; and the downplaying of significant unresolved issues, including the incompatibility of military live-fire training with conservation district rules, among many, many others.

While any of the above concerns would be sufficient grounds for rejection, the Sierra Club of Hawai'i does wish to emphasize that the Board's fiduciary responsibilities only further counsel the non-acceptance of the FEIS.

The Board is likely well aware of its fiduciary obligations with respect to the Pōhakuloa lands at issue, including under the public trust and the public land trust, both of which require that Board members follow "the same strict standards applicable to private trustees."¹

These include the duties to "administer the trust solely in the interests of the [trust] beneficiaries," to "deal impartially when there is more than one beneficiary," and to "use reasonable skill and care to make trust property productive."² Other trust obligations include the state's – and Board's

¹ Ahuna v. Dept. of Haw. Home Lands, 64 Haw. 327, 339 (1982); see also Ching v. Case, 145 Hawai'i 148, 170 (2019); In re Waiāhole, 94 Hawai'i 141-43 (2000).

² Office of Hawaiian Affairs v. Hawai'i Comty. Dev. Corp. Of Haw., 117 Hawai'i 174, 194 (2008).

- duty to “protect and maintain the trust property and regulate its use”;³ to apply the precautionary principle when faced with scientific uncertainty, and “not postpon[e] effective measures to prevent environmental degradation”;⁴ and to “take the initiative in considering, protecting, and advancing public rights in the resource at every stage of the planning and decisionmaking process.”⁵

Simply put, the EIS will only frustrate and confound the ability of the Board to fulfill these fundamental trust responsibilities.

Duty to Administer Trust Resources Solely for the Interests of the Beneficiaries

First, the EIS fails to provide information that would enable the BLNR to ensure that the public trust and public land trust lands at issue will be administered “solely for the interests of the [trust] beneficiaries.” It lacks a good faith assessment of alternative potential uses of these lands, necessary to determine whether conceding to the Army’s proposed land retention would “solely” serve the interests of trust beneficiaries – including the present and future generations who are beneficiaries of the public trust,⁶ and the native Hawaiian and general public beneficiaries of the public land trust.⁷ **A comparison between future uses is critical to ensuring that any disposition of the lands at issue is “solely” for these beneficiaries’ interests, rather than the Army’s.**

The EIS similarly lacks the robust, objective, and specific information needed to determine the potential impacts of the Army’s proposed land retention on the interests of trust beneficiaries. This includes data, analyses, and specific plans the Board needs to assess the risk of permanent loss of endangered species and historic properties; the foreclosure of Native Hawaiian traditional and customary practices protected under the public trust; the impacts of wildfires; the proliferation of debris, UXO, and toxic chemicals and heavy metals across the landscape; and the generations-long if not permanent alienation of these lands; among others. Without such information, the Board, again, will not be able to determine if the Army’s proposed land retention unduly serves the Army’s interests over that of trust beneficiaries.

Duty to Treat Beneficiaries Equally

Second, the EIS fails to provide sufficient information and analyses for the Board to assess and address the unique and deep burdens that will be placed on Native Hawaiian beneficiaries of the public trust and public land trust, as necessary to treat all beneficiaries “impartially.”

As noted above, the public land trust recognizes two beneficiary classes, native Hawaiians and the general public. As both the Hawai’i legislature and U.S. Congress have recognized, “the health and well-being of the Native Hawaiian people is intrinsically tied to their deep feelings and attachment to the land”;⁸ accordingly, actions that impact ‘āina may inflict particular harms on the Native Hawaiian beneficiaries of the trust. However, the EIS fails to provide specific information necessary for the Board to assess the extent to which Native Hawaiians’ attachment to the lands at issue may be particularly burdened by the Army’s proposed land retention.

³ Ching, 145 Hawai’i at 170.

⁴ Waiāhole, 94 Hawai’i at 154.

⁵ *Id.* at 143. (emphasis added).

⁶ HAW. CONST. ART. XI SEC. 1.

⁷ HAW. CONST. ART. XII SEC. 4.

⁸ Pub. L. 103-150; House Concurrent Resolution 6 HD1 SD1 (Reg. Sess. 2013).

This includes, but is not limited to, information needed to fully assess threats and impacts to archaeological sites and properties, place-based cultural practices, endangered and native species, and the land itself. Without such information, the Board cannot even begin to meaningfully address the inequities and disproportionate harms that its Native Hawaiian beneficiaries may suffer, in comparison to the general public – as a necessary first step to ensuring that all public land trust beneficiaries are treated impartially.

Duty to Protect and Regulate Trust Resources

Third, as described above, the EIS does not provide sufficient information for the Department to identify the full range of trust lands and resources that may be impacted under the Army's retention proposal. Without such information, the Board will not be able to carry out its duty to protect and regulate such resources in the administration of the trust lands at issue.

Application of the Precautionary Principle

Fourth, the Hawai'i Supreme Court has reaffirmed the importance of the precautionary principle as an essential mechanism to upholding the public trust. This principle demands that government decisionmakers exercise caution, and take proactive measures to prevent environmental degradation in the face of uncertainty. The EIS' glaring lack of sufficient scientific and cultural information creates significant uncertainty regarding the potential impacts to trust lands and resources, such that the only precautionary approach feasibly available to the Board would be to reject the EIS. Much more complete and specific information is clearly needed before the Army should be allowed to advance its retention proposal beyond this critical environmental impact statement phase.

Protecting and Advancing Public Rights at Every Stage of Planning and Decisionmaking

Finally, the public trust requires that government decisionmakers consider, protect, and advance public rights at every stage of planning and decisionmaking. This clearly includes decisionmaking regarding this EIS, which will be the foundation of planning and future discussions and decisions by and between the Board and the Army, regarding the disposition of the trust lands and resources at issue. Notably, the EIS process is the only clear, comprehensive mechanism to gather information that will be critical to upholding the Board's, and state's, fiduciary obligations. Rejecting this EIS, which as described above would frustrate the Board's ability to fulfill its trust duties, is therefore the only prudent action to take.

Accordingly, the Sierra Club respectfully but strongly urges the Board to uphold the integrity of our environmental review law, fulfill its fiduciary obligations under our public trust and public land trust, and protect the long-abused 'āina of Pōhaku'loa, by REFUSING TO ACCEPT the FEIS before you today.

Mahalo nui for your consideration of this matter.

.

From: [Bert Thornburg](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Final Impact Statement Testimony
Date: Wednesday, May 7, 2025 4:00:49 PM

I am strongly against accepting this final impact statement and moving forward with a new lease. I've heard many stories from those who train there that they feel something and spirits around them at night when they're laying to rest. If you let service members testify I'm sure they'd tell you this if not pressured from superiors. Just saying. This is not just locals saying this. Many from CONUS also stated it who aren't from here.

Mahalo,
Bert Thornburg
Sent from my iPhone

From: [Shane Veinent](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Wednesday, May 7, 2025 5:01:55 PM

Aloha. The FEIS MUST be rejected. The military on Pohakuloa is HEWA! Pohakuloa is positioned over one of the biggest water aquifers in the world. You would think it to be common sense that we would collectively be doing everything we can to protect that. Please reject the FEIS.

From: [Lorraine Waianuhea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1: REJECT U.S. Army EIS
Date: Wednesday, May 7, 2025 8:55:59 PM

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

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

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

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

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

Mahalo nui for the opportunity to provide testimony.

Sincerely,
Lorraine Waianuhea

From: [Jay Warner](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohaku Loa lease
Date: Wednesday, May 7, 2025 9:23:39 PM

To whom it may concern,

I've become aware of the upcoming renewal of the military lease of the Pohaku Loa lands. I'm not in favor of a continuation of same type of lease.

Please count me as a "No" vote. More in depth consideration needs to be taken. The land is precious, and although military training is very important, our lands here on our very small island need protection.

Mahalo, James Robert Warner

Sent from my iPhone

From: [Taylor Warner](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Training Area EIS Testimony
Date: Wednesday, May 7, 2025 7:59:03 PM

Aloha,

I worked at Pohakuloa Training Area as part of the botanical team, monitoring and surveying for the 15 endangered plant species. This plateau is a sacred place to our people. I been to all of the training areas and surveyed almost every ecosystem type at pta in search of rare plants. I have witnessed first hand the desecration of this sacred land. Every day witnessing live fire training, I was sent out in the field down wind of white phosphorus by range control, I experienced RIMPAC with thousands of solidiers using and bombing our 'aina. I witnessed locations with radiation, the impact area which will never be safe for our people to visit and experience, the army is polluting our land with depleted uranium and toxic chemicals. On the western side of the training area I have walked the Alanui o 'Umi, an ancient trail over 400 years old. The military bulldozed a road directly over this ancient trail. The present occupation and practices is significantly impacting the environment and cultural resources at Pohakuloa every single day. Our land and community needs better management.

I urge the Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. This environmental review is inadequate. It is missing key information, including biological and cultural surveys; ignores impacts to adjacent federal lands, a clear requirement under state law; turns a blind eye to threats to endangered species and their habitats, impacts to cultural resources and practices, and even the risk of aquifer contamination; and fails to fully describe alternative uses of the leased areas that could serve the public interest. The EIS fails to disclose the degree to which munitions continue to litter public land. The Department of Land and Natural Resources staff submittal itself calls out the Army for repeatedly refusing to address their concerns throughout the EIS process. The BLNR to stand by its staff, the community, and its mission and reject this poorly written, incomplete, and seemingly bad-faith attempt to disregard Hawai'i's Environmental Protection Act.

I urge the BLNR to ensure that future decision-making on any revised EIS and on any other matter concerning Pōhakuloa is held on Hawai'i Island. Those communities most directly impacted by - and who have the most intimate familiarity with - the lands and activities at issue must be allowed to speak directly to BLNR decision makers regarding what may be proposed for their 'āina and their moku, potentially for generations to come.

I urge the BLNR to require full transparency in any discussions and negotiations between DLNR staff and federal officials regarding the proposed military retention of any and all military-leased lands going forward. This includes regular and timely reporting regarding natural and cultural resources ma uka to ma kai, public and practitioner access, hazards to public health and safety, iwi kūpuna and historic properties, environmental remediation, climate destabilization, land valuations, mechanisms for retention, and alternative uses beyond military activity.

Thank you for time,

Taylor Warner

From: [Savannah Villarreal Wheeler](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written Testimony for Agenda Item D1- Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 7:23:14 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**. As a scientist and lifelong conservationist I must remind you that Hawai'i is the world's leader in highest extinction rate of birds. 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- inevitably harming civilians directly.

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 to 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,

Savannah Villarreal Wheeler

Resident of Kailua-Kona

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

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

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.

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

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

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. Please uphold the law, and your mission, and reject this incomplete and unlawful document. It's time to return these lands and begin a real process of healing and restoration. Accordingly, I urge you to please **REJECT** the FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,

Kristel Whippy

Palolo Valley, 'Oahu

LLM from William S. Richardson School of Law

E: kris25@hawaii.edu

From: [Jonny Wichman](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 9:24:32 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,
Jonathan Wichman

From: [Moanaw](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, May 7, 2025 8:49:57 PM

From a place of aloha and kuleana, I urge you to reject Agenda Item D-1. This FEIS does not fulfill legal obligations or community trust.

Mahalo
Moana Wietecha

From: [Pete Wilson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 5:42:20 PM

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

My name is Peter Wilson 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,
Peter Wilson*

--

Peter Wilson
13-927 Kahukai Street
Pahoa HI 96778
808-557-8108

From: [megan.wong](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Wednesday, May 7, 2025 8:19:46 PM

Testimony Opposing Acceptance of the Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa (Agenda Item D1)
Submitted to the Board of Land and Natural Resources
Friday, May 9, 2025

Aloha Chair Case and Members of the Board,

My name is Megan Wong, and I strongly urge you to reject the Final Environmental Impact Statement (EIS) submitted by the U.S. Army for the retention of land at Pōhakuloa Training Area.

This EIS fails to adequately address the severe environmental, cultural, and spiritual impacts of continued military use of Pōhakuloa—a wahi pana, a sacred and storied place, cherished and protected by generations of Kānaka ‘Ōiwi. The Army’s 65-year lease is set to expire in 2029, and they now seek to renew their grip on over 23,000 acres of stolen crown and government lands. But they have yet to demonstrate the basic respect, accountability, or stewardship that this ‘āina deserves.

The environmental record is devastating: unexploded ordnance, depleted uranium, chemical contamination, and desecration of endangered species habitat. The cultural record is no better—sacred sites destroyed, access denied, and protocols disregarded. How can we trust an institution that has already proven incapable of mālama?

The Army’s EIS glosses over this legacy. It does not reflect the voices of the people most impacted, and it does not offer genuine alternatives or remediation plans. It is simply not pono.

BLNR has a responsibility to uphold the public trust and protect the Aina

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,

Megan Wong

Wainiha, Kauai

From: [Ari Wood](#)
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 6:21:49 PM

Aloha Members of the Board of Land and Natural Resources,

My name is [Full Name], 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,

Ari Wood

From: [Areerat Worawongwasu](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 6:35:01 PM

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

My name is Aree Worawongwasu, and I am PhD student at the University of Hawai‘i at Mānoa. I strongly urge you to reject the U.S. Army’s Final Environmental Impact Statement (FEIS) in Agenda Item D-1.

At the heart of this issue is the undeniable truth that the lands at Pōhakuloa are stolen Hawaiian lands—public “ceded” lands that were taken illegally and without the consent of the Native Hawaiian people. These are not just lands for lease—they are ‘āina kupuna, sacred ancestral lands that have been bombed, poisoned, and desecrated for generations under U.S. military occupation.

The 1993 Apology Resolution by the U.S. Congress acknowledged both the illegality of the overthrow of the Hawaiian Kingdom and the profound relationship between Native Hawaiians and their ancestral lands. And yet, the FEIS disregards this history and fails to address the deep psychological, spiritual, and physical harms inflicted on Native Hawaiians by continued military control and destruction of their ‘āina.

To accept this deficient FEIS is to further entrench that harm, and to extend a legacy of illegal occupation and environmental violence. At minimum, the Army must follow a full and lawful review process that begins to reckon with the truth: that the land it seeks to “retain” does not belong to it.

For 60 years, the Army has used Pōhakuloa for live-fire training, resulting in extensive environmental degradation, including over 1,000 wildfires, toxic contamination, the destruction of endangered species habitat, and the desecration of sacred cultural sites. Despite this long history of harm, the FEIS fails to meet even the most basic requirements under Hawai‘i law. It lacks complete biological and archaeological surveys, ignores cumulative impacts, and disregards alternative uses of these lands—rendering it wholly inadequate for BLNR’s review.

Please reject the FEIS. Do not allow another 65 years of military occupation, harm, and denial of justice on Hawaiian land.

Mahalo nui for your time and the opportunity to testify,
Aree Worawongwasu.

--

Areerat (Aree) Worawongwasu | อารีรัตน์ วรวงศ์วุฒ
PhD Student, University of Hawai‘i at Mānoa
MA (En-Route to PhD), University of Hawai‘i at Mānoa
BA, New York University

Gender Justice Chair, [Academic Labor United](#)

**Testimony in Opposition to Agenda Item D-1
Submitted in Personal Capacity**

To: Chair Dawn Chang and Honorable Members of the Board of Land and Natural Resources

Re: Final Environmental Impact Statement (FEIS) for Military Lease Renewal at Pōhakuloa

Aloha Chair Chang and Members of the Board,

My name is Laura Acasio, and I am submitting this testimony in my personal capacity to **strongly urge you to vote NO on Agenda Item D-1 and reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army for the continued military use of Pōhakuloa.**

The FEIS is fundamentally flawed. It fails to meaningfully consult Native Hawaiian cultural practitioners and ‘Aha Moku councils, and it does not adequately analyze or mitigate the long-term cultural, environmental, and health harms caused by decades of live-fire training and bombing at Pōhakuloa. This sacred ‘āina sits directly above a critical aquifer that supplies drinking water to communities on Hawai‘i Island. Continued military use threatens the health and safety of residents due to contamination risks from munitions, unexploded ordnance, and toxic chemicals that may seep into our groundwater.

Moreover, the Army has repeatedly dismissed the deeply rooted cultural significance of this land. Pōhakuloa is not an empty training ground—it is a *wahi pana*, a storied and sacred landscape. The desecration of these lands through bombing and military activity retraumatizes Native Hawaiians and disregards our collective responsibility to uphold the public trust doctrine that obligates the State to protect lands held in trust for future generations.

The Board’s mission is to enhance, protect, conserve, and manage Hawai‘i’s unique and limited natural, cultural, and historic resources held in public trust for current and future generations, with the goal of preserving these resources for both residents and visitors. Approving this FEIS would be in direct conflict with that mission. I respectfully urge you to uphold your kuleana and reject this FEIS. Vote no on Item D-1. Our future depends on courageous decisions made today to protect our ‘āina, our water, our health, and our cultural identity.

Mahalo for your consideration,

Laura Acasio, Hilo, Hawaii, Moku ‘O Keawe

From: [Koki Atcheson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Submission item D-1 (Pōhakuloa Training Area) May 9, 2025 Board Meeting
Date: Wednesday, May 7, 2025 10:34:25 PM

Aloha Land Board Members:

I am writing as an individual 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.

I humbly submit the following testimony grounded in evidence, amplified from voices I trust who know this issue deeply and have a relationship to Pōhakuloa. Despite wondering if this letter could possibly make a difference, I submit it in recognition that it is never too late to speak out against injustice and unsafe and unacceptable land use actions.

This moment and decision marks a critical juncture, key in defining the future of both Pōhakuloa and the legacy of the Board of Land and Natural Resources. Thank you for maintaining your constitutional duty and holding 'āina, which includes people, at the top of mind as you consider this agenda item.

I have learned and will now share once more the following messages and realities of Pōhakuloa and the FEIS:

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 to 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,
Koki Atcheson
O'ahu resident

From: [Sanoe Awai](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa Reject the EIS
Date: Wednesday, May 7, 2025 10:08:04 PM

Aloha, my name is Sanoe Awai, and I am submitting testimony in strong opposition to agenda item D-1.

I respectfully urge you to reject the Final Environmental Impact Statement (FEIS) for the continued use of Pōhakuloa by the United States military. The military must not be allowed to circumvent the legal and procedural safeguards that protect Hawai‘i’s land, environment, and cultural heritage. Acceptance of this FEIS would set a dangerous precedent—one that undermines the authority of Hawai‘i’s own review processes and opens the door for future applicants to sidestep critical environmental and cultural oversight.

The U.S. military is not above the law. It is essential that all entities, regardless of their power or influence, are held to the same standards of accountability and respect for our ‘āina and our people.

Mahalo for considering my testimony.

-Sanoe Awai

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

Date: 5/8/2025

Aloha Chair Chang and Members of the Board,

My name is Zoe and I am a member of Jewish Voice for Peace Hawai'i. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of Hawai'i.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

Some of the most egregious failures of the FEIS 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.

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.

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.

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 'oia'i'o,

Zoe B.

Honolulu, Hawai'i

Jewish Voice for Peace Hawai'i

From: [Erica](#)
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 10:08:04 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 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,
Erica Brenner
Kealahakua, Big Island
ebrenner808@gmail.com

From: [Skyler Carreira \(2027\)](#)
To: [DLNR.BLNR.Testimony](#); [Kauai Naniolo](#)
Subject: [EXTERNAL] Testimony
Date: Wednesday, May 7, 2025 10:09:46 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,
Skyler Carreira

From: [Kanoë Case](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Pōhakuloa EIS
Date: Wednesday, May 7, 2025 7:41:12 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,
Kanoeuluwehianuhea Case
Moku O Keawe, Hawaii Island
Lineal descendent Ohana O 'Awini

From: [Kenji Cataldo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Regarding the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 9:44:26 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 the Pōhakuloa Training Area and to urge the BLNR to reject the Army's EIS.

Pōhakuloa is a wahi pana, 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 Pōhakuloa, and the FEIS fails to meaningfully address these concerns.

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 and incompatible with the site's designation as conservation land. The ongoing use of live-fire and bombing in the impact area also raises serious concerns about environmental contamination and the long-term degradation of both the land and water, precious and limited resources that must be prioritized for our island communities to experience genuine security. Military training activities of this scale are simply not compatible with conservation, cultural integrity, or aloha 'āina. The EIS is insufficient and should be rejected on several grounds:

- Inadequate environmental and cultural impact analysis
- Lack of sufficient planning to mitigate impacts to cultural and natural resources
- Concerns about depleted uranium on the site that have gone unaddressed
- Incompatibility of military training with the conservation district designation.

To underscore this last point, I want to highlight the Army's own admission in section 3.2.6.1 of the EIS that their proposed retention of Pōhakuloa explicitly violates the rules of land use in a conservation district (3-22). The EIS's analysis assumes a rule amendment and the authorization of a special subzone to circumvent the conservation zoning of Pōhakuloa. We cannot accept this brazen intention to change the rules at the expense of the conservation needs of this site and the long-term sustainability of these lands belonging to the public trust.

In short, the approval of the EIS would conflict with the BLNR's constitutional duty to 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,
Kenji Cataldo

From: [Jordan Cho](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT FEIS
Date: Wednesday, May 7, 2025 9:41:52 PM

Aloha my name is Jordan,

I am a concerned citizen writing in opposition to Agenda Item D-1. The Army's failure to consult 'Aha Moku or conduct meaningful analysis of cultural impacts is reason enough to reject the FEIS.

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.

Our sacred lands deserve to be protected and cared for.

Mahalo,

Jordan Cho

From: [Jessie Cleghorn](#)
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 11:09:31 PM

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 a me ka mana,
Kaleinohea Cleghorn
Pu'u Kapu, Waimea, Hawaii Island
Mother, Teacher, Kanaka Maoli, Hula Practitioner

From: [Clow C](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Rejecting the Army's FEIS
Date: Wednesday, May 7, 2025 10:12:04 PM

Aloha Land Board Members,

By this email, I wish to express my opposition to the U.S. Army's proposed retention of leased lands at **Pōhakuloa Training Area**. I urge the land board to reject the Army's EIS.

I have learned over the years that Pōhakuloa is an important land for several endangered, endemic species and for the Native Hawaiian culture and practices that surround their cultural sites.

Ecologically, 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.

Almost 20,000 acres have been destroyed, burned, endangering native flora and fauna and degrading the environment, both land and water, creating long-term negative effects on the ecology and ecosystem of this part of the island.

Military training activities of this scale are simply **not compatible with ecology**, conservation, cultural integrity, or aloha 'āina, an important local notion that guides ecological responsibility and awareness of the precious resources of the land and waters.

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 thank you for respecting the land, the culture, and the people of Hawai'i by **rejecting the Army's FEIS** for Pōhakuloa, and for beginning to restore the natural habitats, and protect the earth.

Our planet, our islands are precious and we must act now to protect them for generations to come and to ensure our future.

Sincerely,

Mary Clow

From: [Attorney Naomi Cohen](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] reject Army's bogus impact report
Date: Wednesday, May 7, 2025 10:20:11 PM

Aloha BLNR:

Our island is a rare treasure. Born from the sea, with a unique nature all her own. Military leases destroy our fragile and unique habitat and species, pollute it, and poison the air, land, and water.

The Army's Environmental Impact Report is a self-serving mockery meant to propagate the interests of the army, not the betterment of this island or her people. The only just decision is to reject the bogus report, anything else will be an invitation for corruption and destruction in the name of war and its machinery, completely incompatible with the interests of our island.

Naomi Cohen
Kurtistown, HI

From: [Leslie Colter](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Wednesday, May 7, 2025 11:33:41 PM

REJECT the Inadequate EIS for POHAKULOA!

Leslie Colter
Lea_PunaSolutions@yahoo.com
808.938.9374

From: [Jennifer Engle](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to REJECT the Army's FEIS
Date: Wednesday, May 7, 2025 11:37:39 PM

Aloha BLNR Board Members,

My name is Jenny Engle. I am writing urgently to ask that you reject the army's Environmental Impact Statement on Pōhakuloa as a passionate member of the community and believer in the right of Hawaiian land to exist undefiled by the United States military. The Environmental Impact Statement in regards to the sacred grounds of Pōhakuloa is a deficient analysis of the army's true effect on the environment and fails to address critical issues, a handful of which I will summarize here.

For one, there have been no studies adequately addressing the presence of heavy metals such as lead and magnesium in the soil and their impact on the aquifer, and unreliable information on the air quality in the leased area (the last monitor was in 2007). Damningly, since the army started live-fire training at the PTA in 1943, there have been over 2,000 fires there, over 1,000 of which were caused exclusively by army activity; additionally, there has been no monitoring of greenhouse gas emissions. These environmental concerns are heightened when you consider that the state-owned land at PTA provides a potential habitat for 20 federally listed plant species, two federally listed invertebrates, three federally listed bird species, and one protected mammal species. Significant areas of the land in question have been seriously under-surveyed for cultural resources. The land that is the subject of the FEIS is only 23,000 acres out of 111,000 PTA federal land and the remainder of which go unaddressed in the document.

I support the no action alternative and no land retention by the military. For the reasons stated and for the failure of the EIS to honestly and thoroughly address the myriad inconsistencies and fallacies underlying the retention of Pōhakuloa by the United States military, please consider this call to action as we attempt to preserve the hallowed ecosystems here in Hawai'i and honor the land that has been leased to the military up to this point and which will hopefully return to the hands of Kānaka Maoli as rightful stewards and conservators of this 'āina. The state is responsible for the public trust and for future generations' right to a safe and intact Pōhakuloa. Mahalo.

Me ka ha'aha'a,

Jenny Engle
Concerned resident of Honolulu

Sent from my iPhone

From: [Lily Engle](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 10:16:56 PM

Aloha BLNR Board Members,

My name is Lily Engle. I am writing urgently to ask that you reject the army's Environmental Impact Statement on Pōhakuloa as a passionate member of the community and believer in the right of Hawaiian land to exist undefiled by the United States military. The Environmental Impact Statement in regards to the sacred grounds of Pōhakuloa is a deficient analysis of the army's true effect on the environment and fails to address critical issues, a handful of which I will summarize here.

For one, there have been no studies adequately addressing the presence of heavy metals such as lead and magnesium in the soil and their impact on the aquifer, and unreliable information on the air quality in the leased area (the last monitor was in 2007). Damningly, since the army started live-fire training at the PTA in 1943, there have been over 2,000 fires there, over 1,000 of which were caused exclusively by army activity; additionally, there has been no monitoring of greenhouse gas emissions. These environmental concerns are heightened when you consider that the state-owned land at PTA provides a potential habitat for 20 federally listed plant species, two federally listed invertebrates, three federally listed bird species, and one protected mammal species. Significant areas of the land in question have been seriously under-surveyed for cultural resources. The land that is the subject of the FEIS is only 23,000 acres out of 111,000 PTA federal land and the remainder of which go unaddressed in the document.

I support the no action alternative and no land retention by the military. For the reasons stated and for the failure of the EIS to honestly and thoroughly address the myriad inconsistencies and fallacies underlying the retention of Pōhakuloa by the United States military, please consider this call to action as we attempt to preserve the hallowed ecosystems here in Hawai'i and honor the land that has been leased to the military up to this point and which will hopefully return to the hands of Kānaka Maoli as rightful stewards and conservators of this 'āina. The state is responsible for the public trust and for future generations' right to a safe and intact Pōhakuloa. Mahalo.

Signed,
Lily Engle, member of Hui Aloha 'Āina o Honolulu

Chair Dawn Chang: Board of Land and Natural Resources
BLNR Committee Members Smith, Canto, Ono, Barns, Char and Yoon
Department of Land and Natural Resources

May 7, 2025

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

Aloha mai e Chair Chang and Honorable BLNR Committee Members,

I'm submitting testimony as a concerned Kanaka 'Ōiwi and po'e aloha 'āina to implore you all to **REJECT** the Final Environmental Impact Statement (FEIS) submitted in support of continued military use of the Pōhakuloa Training Area (PTA).

I grew up on Hawai'i island... seeing, hearing, feeling the fatal concussions of military use and abuse of our 'āina. For over 70 years, this landscape has endured relentless degradation under U.S. military occupation. The submission of the FEIS is literally a checking off the box of the require public consultation by the military that allows the continued desecration of this 'āina and significant aquifer.

I offer this testimony on behalf of our lāhui to raise my concerns:

Environmental Contamination

The military through the years have proven to be unreliable and unaccountable stewards of our 'āina, aquifers and kai. They have continually contaminated our soils, water tables, and ocean and will clean up only when they are forced to by lawsuits. The military has often withheld or delayed information, hampering public health responses and trust. Have we not learned from the Red Hill disaster that will continue to adversely affect our drinking water on O'ahu? Over 27,000 gallons of jet fuel knowingly leaked, contaminating the O'ahu drinking water system affecting 93,000 people. We now are enduring a long-term threat to the Southern O'ahu Basal Aquifer, which supplies over **77% of Honolulu's drinking water**.

Depleted Uranium (DU) was uncovered at Pōhakuloa and Schofield Barracks from old spotting rounds used in live fire training. These radioactive contaminants are known to leach into groundwater or remain in soil, posing long-term exposure risks. Are you willing to allow the military to now poison the Hawai'i island aquifer?

Unexploded Ordnance (UXO): Thousands of UXOs remain across former and current training sites, rendering large areas of 'āina unusable and dangerous. Please do not forget Kaho'olawe, Mākua, Lualualei, Kahana, Waikoloa, Waimea, Schofield, and numerous landscapes throughout our archipelago that are irreparably damaged. Despite a \$400M+ cleanup, Kaho'olawe is still riddled with UXOs and is unsafe for full public access.

Soil degradation and erosion: Craters, fire, and vehicle damage disturb natural processes, increase sediment runoff which damage our reef ecosystems that provide us food and protection from storm events, and destroy native vegetation and organisms..

Cultural desecration: Military training has wantonly desecrated heiau, iwi kūpuna, and sacred land and seascapes. 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. When is enough, enough? The EIS gravely underestimates the environmental, cultural and socio-economic 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. The well-being and health of our communities are directly tied to the well-being and health of our environment.

U.S. Military Occupation: The U.S. military presence at Pōhakuloa stems from an illegal overthrow and unlawful annexation of the lawful 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 Native Hawaiians.

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 protection and conservation.

I implore this committee to stand as pono human beings and embody aloha 'āina today and for the generations that come behind us. You will be remembered not by your deference to the status quo and military power, but by your courage to stand up for the only homeland we have!

Aloha 'āina,
Malia K. Evans
Ko Hawai'i Pae 'Āina
evansmas@hawaii.edu

From: [Dana Lacy](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] OBJECTION to the EIS
Date: Wednesday, May 7, 2025 10:29:52 PM

Aloha,

My name is Dana Fergerstrom and I am writing in OBJECTION of the submitted EIS.
The physical desecration and disrespect of our aina and culture will no longer be tolerated by our community.

Finding significant cultural artifacts and not disclosing them is absolutely absurd! It should have been disclosed upon immediate discovery and the fact that it wasn't is just one of the many reasons the US military are terrible stewards and should NOT have their lease extended.

Military presence in Hawai'i needs to be pau. Enough already! Please let our aina heal.

Mahalo,
Dana

Sent from my iPhone

From: [kapulei flores](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject EIS for PTA
Date: Wednesday, May 7, 2025 11:21:23 PM

TO: Board of Land and Natural Resources (BLNR)

Aloha,

I am writing to ask that you REJECT the final EIS for the army training land retention at Pōhakuloa Training Area.

The EIS does not adequately reflect the historic and ongoing harm that the military has inflicted on rare and endangered wildlife, such as our native birds and snails. Hawai'i is the bird extinction capital of the world, and the military has had a large impact on that. Pōhakuloa is known critical habitat for our native ecosystem and the level of loss, destruction, and desecration that has been perpetuated by the military is not thoroughly shown in the EIS document.

This EIS does not even mention our native snails, kāhuli, that have been found there as seen in bishop museums findings. <https://acrobat.adobe.com/id/urn:aaid:sc:VA6C2:f502ed2a-7356-4779-9531-46ebf992a842>

The BLNR has an affirmative duty and legal obligations to protect the natural and cultural resources, public land trust, and rights of the public and Kanaka Maoli (aka Native Hawaiians) connected with the lands referred to as Pōhakuloa.

Please REJECT this EIS for the betterment of our land, people, health & longevity of Hawai'i.

Mahalo for your time and consideration,

Kapulei Flores

From: [Elyse Fujioka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Army FEIS Testimony
Date: Wednesday, May 7, 2025 10:52:20 PM

Aloha kākou,

I am writing to express my strong opposition of the U.S. Army's proposal to retain the lease for the lands wherein the Pōhakuloa Training Area currently resides, and to urge the Land Board to **reject** the Army's final EIS.

The final EIS lacks a sufficient plan to mitigate impacts to cultural and environmental resources within Pōhakuloa. The Military's continued usage of this wahi pana is antithetical to the preservation of this land for Native Hawaiian people. Pōhakuloa cannot be considered a conservation district when there continues to be live fire training -- the two do not go together.

The stewardship of native species in the area referred to in Section 3 is insufficient. The Army continues to put some of Hawaii's most endangered species at risk. The land remembers. There is an endless list of long-term impacts environmentally and culturally, both seen and unforeseen, that the military training within the past 61 years has caused.

Continuing live fire training at Pōhakuloa puts not only the land at risk, but our community too. The BLNR has a constitutional duty to take care of this land. The community has been largely outspoken about the Military's occupation of Pōhakuloa. The chance to protect Hawai'i for future generations of kānaka 'ōiwi is now, by rejecting the FEIS.

Mahalo,
Elyse Fujioka

From: [Kara Fujita](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] TESTIMONY OPPOSING AGENDA ITEM D1: REJECTION OF U.S. ARMY'S FINAL EIS FOR PŌHAKULOA TRAINING AREA
Date: Wednesday, May 7, 2025 11:54:51 PM

Aloha Chair and Board Members:

I write to you today not just as a concerned citizen, but as someone born and raised in Hawai‘i, with ancestral ties to this ‘āina including a career working internationally in sustainability innovation with deep awareness of Hawai‘i's role on the global stage with the precedence we are setting. I urge the BLNR to reject the Army's Final Environmental Impact Statement (FEIS) regarding the retention of leased lands at Pōhakuloa Training Area.

Pōhakuloa is a wahi pana—a sacred and storied place—that holds tremendous cultural significance to Native Hawaiians and is home to some of Hawai‘i's most endangered species. The area includes **one of the last remaining sub-alpine tropical dryland ecosystems in the world** and is **home to nearly two dozen endemic threatened or endangered plant species**. [Ka Wai Ola](#) Each bomb that falls on this land is not just striking soil, but destroying part of our collective and environmental heritage and determining the literal face of this earth for future generations.

Constitutional and Moral Obligations:

The military's primary duty under the U.S. Constitution is to "provide for the common defense" of American citizens. Yet in pursuing this lease renewal, they contradict this very mission. How can an institution sworn to protect American lives simultaneously justify destroying the natural systems that sustain those lives? This represents a profound moral contradiction and arguably a dereliction of their constitutional duty.

The Hawai‘i State Constitution explicitly recognizes in Article XI, Section 1 that "all public natural resources are held in trust by the State for the benefit of the people." **This constitutional provision creates a sacred obligation for the BLNR to protect these lands for present and future generations—not to surrender them for military exercises that could be conducted elsewhere.**

Our Connection to the Land:

As Hawaiians and island residents, we understand what those from continental perspectives may not understand: we are not separate from nature—we are nature. The elements that compose our bodies are the same elements found in the lava fields and native forests of Pōhakuloa. **When we destroy these ecosystems, we are quite literally destroying ourselves.**

In Hawaiian wisdom, we recognize the concept of kuleana—both privilege and responsibility. The military claims it needs this land for national security, but what greater security threat exists than the climate crisis now threatening our islands with rising seas, devastating wildfires, and extreme weather events? **The recent catastrophic fires in Maui and ongoing climate disasters remind us that true security lies in environmental protection, not its destruction.**

Alternative Options and Military Accountability:

The Desert Training Center (DTC) in the Mojave Desert and Sonoran Desert has historically served as a major military training facility spanning California and Arizona. [Wikipedia](#) This facility encompasses 18,000 square miles, making it "the largest military training-maneuver area in the world." [Blm](#) **Why, then, is the Army so determined to continue bombing sacred Hawaiian conservation lands when superior alternatives exist?**

We must ask: If American taxpayers fund the military, and if the military exists to protect American interests, then why does the military refuse to protect one of America's most precious and irreplaceable resources—our unique island ecosystems? ***When the military has viable training alternatives in places like the Mojave Desert***, their insistence on Pōhakuloa suggests that Hawaiian lands and Hawaiian lives are somehow valued less than military convenience.

The Federal Trust Responsibility to Native Hawaiians, established through numerous congressional acts, creates obligations for all federal agencies, including the military, to protect Native Hawaiian cultural resources and rights. **The military's continued destruction of sacred lands violates this trust responsibility.**

Legal and Procedural Failures:

The Hawai'i Supreme Court ruling in *Kahalelio v. DLNR* (2019) established that the State has breached its trust duties by failing to properly monitor these lands. The Court found that state officials had failed to ensure the military upheld its duties to clean up Pōhakuloa and had harmed Hawaiian cultural interests, stating that **"as trustee, the State must take an active role in preserving trust property and may not passively allow it to fall into ruin."** [West Hawaii Today](#)

The Department of Land and Natural Resources and the Office of Conservation and Coastal Lands have submitted "blistering comments" about the military's use of the land, noting "adverse impacts" to animals, archaeological assets, and cultural resources. [Honolulu Civil Beat](#) **The expert agencies of our own state government recognize what the military refuses to acknowledge: that this land cannot sustain further military abuse.**

Environmental Justice:

This issue represents a clear case of environmental injustice. **The military chose Hawai'i for training not because it's the only suitable place**, but because historically, Hawaiian lands have been easier to appropriate and exploit than mainland resources. "The military is even using our Hawaiian home lands... while our people wait 40 years on the waiting list. How much more are they going to take from us?" [Ka Wai Ola](#)

The National Environmental Policy Act (NEPA) requires federal agencies to consider environmental justice impacts. The Army's FEIS fails to adequately address the disproportionate impact on Native Hawaiians who have already lost vast tracts of land to military use.

Conclusion:

In the face of our current climate emergency—with rising seas threatening our shorelines, intensifying storms, and increasing wildfire risk—**the military's insistence on bombing conservation lands is not just misguided; it's dangerous.** As climate change accelerates,

intact ecosystems like Pōhakuloa become ever more precious for carbon sequestration, water retention, and biodiversity preservation.

I ask you to consider: **What will we tell future generations? That we allowed one of the world's rarest ecosystems to be destroyed for military exercises that could have been conducted elsewhere?** Or that we stood firm, protected our sacred land, and recognized that true security comes from living in balance with the natural world?

I respectfully urge the Board to **reject the Army's FEIS** and begin the process of healing and restoration for this sacred land. **As the U.S. military itself has acknowledged climate change as a national security threat, it's time they align their actions with this understanding and find alternative training sites that don't sacrifice irreplaceable Hawaiian ecosystems.**

Me ka mahalo nui,

Kara L. Fujita

Honolulu, Hawai'i

From: [Keala Fung](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for agenda item D1
Date: Wednesday, May 7, 2025 11:18:27 PM

Aloha Chair Chang and Members of the Board,

My name is Keala Fung, and I am a member of **Hui Aloha ‘Āina o Honolulu**. I write in strong OPPOSITION to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army’s proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen ‘āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this ‘āina.

The most egregious failures of the FEIS 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 'oia'i'o,

Keala Fung
Honolulu, HI

From: [Belinda Garcia](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written Testimony
Date: Wednesday, May 7, 2025 11:30:10 PM

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,
Belinda Solana Kalani Garcia
Pāhoa, Hawai'i Island
Kanaka Maoli
8089890451

B.G. Kalani

From: [Kalani Garcia](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] WRITTEN TESTIMONY, "A"ole!
Date: Wednesday, May 7, 2025 11:28:16 PM

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,
Belinda Solana Kalani Garcia
Pāhoa, Hawai'i Island
Kanaka Maoli
8089890451

From: [Sonja G](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 10:37:55 PM

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

My name is Sonja Giardina 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 does not have the information it needs to even begin upholding these public trust duties.

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.

I urge the BLNR to reject this FEIS put forward in Agenda Item D-1, as an affront to its responsibilities under our constitution and the public trust.

Mahalo nui for the opportunity to testify.

Sincerely,

Sonja Giardina

From: [Berta Guzman](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] SAVE POHAKULOA
Date: Wednesday, May 7, 2025 11:18:33 PM

Aloha my name is Berta Guzman

I respectfully submit this testimony to ask that you reject the FEIS for the continued military use of Pōhakuloa. This document does not meet environmental, legal, or ethical standards expected in our state.
if there is ever a time to listen & hear the people speak ...now is the time !!!

Mahalo & Aloha Berta Guzman

Sent from my iPhone

From: [Noelani Hochuli](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Final EIS for Pōhakuloa
Date: Wednesday, May 7, 2025 9:42:00 PM

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

Aloha Members of the Board of Land and Natural Resources,

My name is Nakoa Christian Hochuli, 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,
Nakoa Christian Hochuli
Kapaa, Kaua'i, Hawai'i

From: [Taylor Raine Holt-Maunakea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D1, Pohakuloa Testimony
Date: Wednesday, May 7, 2025 10:13:00 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.

Me ka ha'aha'a,
Taylor Holt-Maunakea

Wai'anae, O'ahu

From: [Emi Jenkins](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 11:07:11 PM

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

Date:

Aloha Chair Chang and Members of the Board,

My name is Emi Jenkins, and I am a member of **Hui Aloha ‘Āina o Honolulu**. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army’s proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen ‘āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this ‘āina.

The most egregious failures of the FEIS 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 'oia'i'o,

Emi Jenkins

--

she/her

Mō'ili'ili, O'ahu

HAA o Honolulu Member

(808) 224-8400

emi.t.jenkins@gmail.com

From: [MAKAMAE KAAWA](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] PTA
Date: Wednesday, May 7, 2025 11:00:23 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 ‘oia‘i‘o

Mahana Kaawa
187 King Ave
Hilo, Hawaii
Kanaka Maoli

From: [Kaliko Kalāhiki](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1, REJECT the FEIS
Date: Wednesday, May 7, 2025 10:18:22 PM

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

My name is Kaliko Kalāhiki, 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 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.

Mahalo nui for the opportunity to testify.

Sincerely,

Kaliko Kalāhiki

From: [Marlee Kamakaala-Miller](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Army EIS
Date: Wednesday, May 7, 2025 11:25:49 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.

The State has an obligation to mālama 'āina, respect the land. The on-going desecration and contamination of the land by the US Army does not align with the DLNR's mission statement, "Enhance, protect, conserve and manage Hawaii's unique and limited natural, cultural and historic resources..."

My 'ohana and I urge you all to reject the Army's EIS and not renew their lease.

Mahalo,

Marlee

From: [Moses Kaoui](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written Testimony: Final Environmental Impact Statement (EIS) for the Army Training Land Retention at PTA,
Date: Wednesday, May 7, 2025 11:40:34 PM
Attachments: [Letter of Support for Final EIS and Army Retention of PTA.pdf](#)

Aloha,

Attached is my written testimony for May 9, 2025 at 09:00 hours for the agenda item 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.

Mahalo,

V/R

Moses Kaoui Jr.
Brigadier General, USA Retired

1441 Kapiolani Blvd
Ste 1114 #710769
Honolulu, HI 96814-4406

NAICS Codes: 541611, 541612, 541613, 541618

From: [MaryLu Kelley](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] RE: Oppose U.S. Army's retention of Pōhakuloa Training Area, and reject the Army's EIS
Date: Wednesday, May 7, 2025 11:07:47 PM

Aloha Land Board Members:

I am writing from Kauai 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,

Mary Lu Kelley

Koloa, Kauai

From: [Briana Lagrimas Melendez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to protect Pōhakukoa
Date: Wednesday, May 7, 2025 10:01:05 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 this board to reject the Final Environmental Impact Statement (FEIS).

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. It is a place where the land remembers. The Army has repeatedly shown that it does not possess the capacity or the will to act as a proper steward of this sacred 'āina, and the FEIS fails to meaningfully address these long-standing concerns.

The Army's past actions have already led to irreversible damage, including the burning of nearly 20,000 acres—much of it designated critical habitat for native species. This is unacceptable. The continued use of live-fire and bombing in the area poses serious risks of contamination, destruction, and long-term degradation of the land, water, and ecosystem. The cost of such activities extends far beyond what we can physically see—it is a loss of life, identity, and future.

As a Native Hawaiian family, we did not grow up fluent in our mother tongue. But we made a conscious choice to reconnect—to learn not just the Hawaiian language, but the language of the 'āina. In doing so, our lives transformed. We began to see the world through the eyes of our kūpuna and understand that our relationship to this land is not one of ownership, but of kuleana.

He ali'i ka 'āina, he kauwā ke kanaka. The land is chief, and we are its servants. This 'Ōlelo No'eau reminds us that the land is not ours to exploit, but ours to serve and protect. When the land is destroyed, so too is our ali'i—our leader, our teacher, our source of life.

We speak today because our kuleana demands it. We use our leo to protect what cannot speak for itself, to stand against the injustice done to this 'āina and to future generations who will inherit the consequences of today's decisions. The impacts of military use reach beyond the visible—they scar the spirit of the land and the soul of our people.

The FEIS must be rejected on the following grounds:

- Inadequate environmental and cultural impact analysis
- Lack of a sufficient mitigation plan for damage to cultural and natural resources
- Failure to address serious concerns such as the presence of depleted uranium
- Incompatibility of military activity with the conservation district designation
- Conflict with the Board's constitutional duty to mālama 'āina

I urge the members of the Land Board: honor your kuleana, uphold the trust placed in you, and reject the Army's FEIS. The time has come to return these lands and begin a real process of healing. Not just for the 'āina, but for our people. We owe this to our kūpuna, to our keiki, and to the ali'i that is our land.

Mahalo for your time!

Briana Lagrimas -Melendez

From: [Tara Lanzer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] please REJECT the US Army's FEIS
Date: Wednesday, May 7, 2025 11:02:22 PM

Aloha,

As a Hawai‘i Island resident, I am reaching out to ask you to **please reject the Army's Environmental Impact Statement** for Pōhakuloa Training Area and do not move forward with a lease renewal for military training. The EIS is inadequate in addressing the environmental and cultural impacts to the area. Pōhakuloa 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, which are facing enough challenges without considering damages to the environment by the military. The ‘aina should be protected and honored, and the Army has not demonstrated the capacity or will to serve as a proper steward of this land, as they have not provided any plan to clean or correct any of the damages already made. Their incomplete and inaccessible SOPs and analyses of impact on contamination of groundwater, soil, and air also demonstrate this lack of reliability.

The FEIS doesn't meet the legal or ethical standards for protecting Hawai‘i's lands, water, endangered species, or communities. You must reject it.

Mahalo for you time,

Tara Lanzer
Hilo, Hawai‘i

From: [Kekupuohaoha Loo-Ching \(2027\)](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Wednesday, May 7, 2025 10:08:00 PM

Aloha Land Board Members,

Pōhakuloa is not just any piece of land—it is a *wahi pana*, a sacred and special place with deep cultural meaning. It holds important Native Hawaiian cultural sites and is home to some of the rarest plants and animals in Hawai‘i. The U.S. Army has not taken good care of this land, and their Final Environmental Impact Statement (FEIS) does not properly deal with the serious concerns shared by the community.

The Army has already caused major damage—almost 20,000 acres have burned, including areas that are supposed to be protected for endangered species. This is unacceptable. Ongoing bombing and live-fire training only make things worse, putting the environment, water, and people’s safety at risk.

Military training on this scale simply does not match with caring for the land, protecting culture, or practicing *aloha ‘āina*—love and respect for the land. It’s time for change.

There are many good reasons to reject the FEIS:

- The Army did not properly study how the training would harm the environment and cultural sites
- There is no strong plan to reduce the damage
- Concerns about depleted uranium haven’t been answered
- Military use doesn’t fit with the conservation status of the land
- Saying yes would go against BLNR’s duty to protect and care for the land

For all these reasons, I ask the land board to reject the Army’s FEIS and start the process of giving this land back and helping it heal. Me ke aloha,

Kekupu Loo-Ching
Honolulu, Hawai‘i

From: [M Loo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please REJECT the Army's Final EIS
Date: Wednesday, May 7, 2025 10:34:50 PM

May 7, 2025

Aloha Members of the Board of Land and Natural Resources:

I am writing to express my **100% opposition** to renewal of a 65-year lease for the U.S. Army at **Pōhakuloa**. I strongly request the Board **reject the Army's Final EIS** which is entirely inadequate in addressing the environmental and cultural impacts to this 'āina.

The widespread contamination, ongoing desecration, destruction of critical habitat, and lack of cooperation, transparency, or will by the U.S. Army to do right by the community, Kanaka Maoli, and the 'āina are **entirely unacceptable**.

The days of rampant and unchecked desecration and disrespect need to end! Approval of the Army's Final EIS by this Board would **directly conflict with your constitutional duty** to care for the lands of these islands. Please uphold your trust duty and **reject the FEIS**.

Mahalo for your vote to end this unacceptable madness,
Maile Loo-Ching
Kaimukī, O'ahu

From: [Debbie Misajon](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] No to extending Pohakuloa Training area
Date: Wednesday, May 7, 2025 10:45:16 PM
Attachments: [202504debbiesignature_75d9a8a4-4522-479f-a010-050273fdd748.png](#)

Please accept this email as my written testimony as a Big Island resident not in favor of renewing the lease that would continue military training at Pohakuloa.

If I have submitted this testimony in the wrong place, please respond with the correct email or site to submit testimony against renewing the lease at Pohakuloa.

Shiukd you have any questions, please contact me on [808-388-0696](tel:808-388-0696). Or email me dcmisajon@gmail.com or reply to this email.

Mahalo,
Debbie Misajon
PO Box 327
Papaikou, HI 96781
Tel: 808-388-0696

Get [Outlook for iOS](#)

DEBBIE MISAJON

FOUNDER OF THE COCONUT TRAVELER

+1-808-388-0696

Hawaii's only certified B Corp travel company specializing in luxury, customized journeys that contribute to the well-being of the islands. Each itinerary includes a Responsible Tourism Fee, donated to local volunteer organizations on Giving Tuesday.



Credit card and wire transfer fees are non-refundable. By reading this email, you agree to our Terms & Conditions, available on our website along with our latest Journal entry.

From: [Aku Maka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Wednesday, May 7, 2025 10:54:10 PM

'Both the ethnocide and ecocide the Pacific Islands continue to face are a result of militarization in the service of continued exploitation and control by powerful nations of the Global North...'

-Spencer, Fentress, Touch, Hernandez

"In the Pacific we find stolen lands a plenty, stolen kingdoms, islands transformed into fortresses, bodies and lands poisoned through military testing and an array of colonial bodies shipped off to war."

-Na'puti & Bevacqua

We demand you leave the island of Hawaii bc it's next to our sacred sites like Mauna Kea, Mauna Loa, Kilauea & much more

Military knows what they are doing to kānaka maoli, that this is environmental injustice, environmental racism yet their cruelty & entitlement knows no end

We should not have to explain why this needs to end now

I find it interesting that we never hear about Military polluting any of the other 49 states

From: [Prana Mandoe](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Vote Against Lease Extension for Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 10:12:03 PM

Aloha Board Members,

There are innumerable reasons to DENY the proposed retention of leased lands at Pōhakuloa Training Area, and I urge the land board to REJECT the U.S Army's Environmental Impact Statement. Still, I will keep my testimony simple and focus on one point:

Military use, including bombing, live-fire training, contamination and debris associated with these activities, and the stirring up of depleted uranium in the soil are NOT compatible with conservation zoning.

Conservation means "[the protection of plants and animals, natural areas, and interesting and important structures and buildings, especially from the damaging effects of human activity](#)" Bombing means "an attack or attacks on an area or place using bombs." (Cambridge Online Dictionary). Protection is the opposite of attacking. Protecting means keeping things safe. Attacking means harming.

Much of "Pōhakuloa Training Area," as this 'āina has been called for the past 61 years, is conservation land. That means land dedicated to keeping plants, animals (including endangered species), natural areas, and other structures of interest (such as heiau and storied Hawaiian cultural landscapes) SAFE FROM HARM.

I call upon you, Board Members, to fulfill your commitment to the Constitution of the State of Hawai'i by enforcing conservation zoning and conservation law through mālama 'āina. Do NOT continue to allow the lease of conservation land to the U.S. military, which literally attacks it. I have seen these bomb attacks on the 'āina with my own eyes, and heard them with my own ears, just by driving over Saddle Road.

In conclusion, as members of the Board of Land and Natural Resources of the State of Hawai'i, you have a duty to protect the State Constitution by protecting our lands, including conservation lands (and trust lands). The way to show you are doing an ethical job is to END the lease of Pōhakuloa to the U.S. Army. By definition, military training does not belong on conservation lands, because it attacks, not protects.

We urge you to fulfill your kuleana to the lands of Hawai'i that we love by voting NO on the continuance of the military lease.

Thank you for your prompt action protecting the lands of Hawai'i,

Prana Mandoe
Hilo, Hawai'i

From: [Kelsey Mapa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the US Army's Final EIS for Pōhakuloa
Date: Wednesday, May 7, 2025 10:46:32 PM

Aloha,

My name is Kelsey Mapa and I am writing to urge the Board of Land and Natural Resources to reject the US Army's Final Environmental Impact Study for the proposed retention of 23,000 acres at Pōhakuloa Training Area.

It is time to stop the destruction and desecration of Pōhakuloa and of all lands by the US military, the #1 institutional polluter on planet earth. The US Military releases more carbon emissions into the air than dozens of entire nation-states and, by doing so, they exacerbate the climate crisis and continue to make all of us less safe. We only have one home and all of us should be fighting to keep it from burning. Ending the US Military's Pōhakuloa Training Area lease would be a great first step in demilitarizing Hawai'i and truly protecting our land and natural resources, so we can enjoy a liveable planet for ourselves and future generations.

With centuries of wisdom passed down through generations, Kānaka Maoli are the best source of information about the land and our resources here in Hawai'i, yet the US Army's EIS is woefully insufficient in seeking and considering their perspectives. Kānaka Maoli are clear that the continued bombardment of Pōhakuloa by the US Army is a threat to the aquifer that lies below. We must listen to them.

Even without their input, it doesn't seem difficult to comprehend that polluting the earth with weapons and chemicals will affect the water table and eventually human life in Hawai'i. I am not that old, but in my lifetime, I have witnessed how the US Military cares for, or should I say fails to care for, our lands and resources. I have seen them leave their mess on Kaho'olawe; I've seen them spill chemicals near my home, on Haleakalā; everyone knows about the catastrophe at Kapūkakī/Red Hill; and those are just the disasters that made the news.

We are placing our trust in you. Please have the integrity to do what is best for the earth, our waters, and for the people of Hawai'i and reject the US Army's Final EIS for the proposed retention of 23,000 acres at Pōhakuloa Training Area. Enough already!

Mālama Pono,
Kelsey Mapa
Maui, Hawai'i

From: [Martha E. Martin](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please reject Army EIS , in Agenda Item D-1
Date: Wednesday, May 7, 2025 4:02:12 PM

Aloha BLNR,

My name is Martha E. Martin, and I have lived in Hawaii over 80 years. During my lifetime the military has for 60 years degraded Kahoolawe Island, Red Hill on Oahu, Pohakuloa on Hawaii Island, and other leased lands.

The proposed Army EIS fails to report the severe environmental damages it has caused from contamination left by exploded and unexploded munitions, toxic chemical and heavy metals contamination, and wildfires ignited.

The BLNR ought to protect public lands by stopping environmental destruction.

Please reject this Army EIS in Agenda Item D-1.

Mahalo,
Martha E.Martin
Kahului, HI 96732

From: [Madi Masek](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Stop bombing Pōhakuloa, Reject the US Army's FEIS
Date: Wednesday, May 7, 2025 9:42:22 PM

Aloha,

We need to protect Hawai'i's lands from being destroyed. The military destroys the land with their weapons, pollutes the soil & ocean with their runoff, and ignores the harm they do to 'āina, wai, and kaiāulu. The military leases cannot be renewed.

Mahalo
Madi Masek

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

Date: Wednesday, May 7th 2025

Aloha Chair Chang and Members of the Board,

My name is Niya Denise McAdoo, and I am a member of **Hui Aloha 'Āina o Honolulu**. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

The most egregious failures of the FEIS 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 'oia'i'o,

Niya Denise McAdoo
Honolulu, 'Oahu
Student

From: [Makahaloa Fishing Association](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in Opposition to Acceptance of EIS for Pōhakuloa
Date: Wednesday, May 7, 2025 9:46:57 PM

Aloha Land Board Members,

Mahalo for doing the work you folks do. I am writing to express my opposition to the continued leasing of State trust lands to the U.S. Army at Pōhakuloa and to ask the land board to reject the Army's EIS.

Pōhakuloa is wahi pana. We know this 'āina is home to irreplaceable cultural sites and some of Hawai'i's most endangered species. The U.S. Army has repeatedly shown that it is not a good steward of State lands and that the State of Hawai'i has very different values than the U.S. government. The Army's actions have already resulted in the burning of nearly 20,000 acres of Pōhakuloa. Last Sunday I drove saddle and it was a dustbowl.

Military training is not pono for conservation zoned land. The EIS is insufficient and should be rejected as it does not provide sufficient environmental mitigation for an activity because it is not appropriate! These are the hard decisions but also the simple ones.

Please perpetuate our lands in righteousness. Mahalo for considering this testimony.

Blake McNaughton

Kaupakuea Ahupua'a, Hawai'i Island

President, Makahaloa Fishing Association.

--



www.makahaloa.com

PO Box 83-1084 Pepe'ekeo Hi 96783

Ua ola no o kai i kai - Fishers live by their own efforts
'Ōlelo No'eau (2838)

From: [Mahina McRoberts](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa EIS Hearing Testimony
Date: Wednesday, May 7, 2025 10:32:01 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,
Mahina McRoberts
Waimānalo, HI

From: [Jeffrey Mermel](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT (Do NOT Accept) the Final EIS on Pohakuloa (PTA)
Date: Wednesday, May 7, 2025 11:09:34 PM

Aloha BLNR members:

As a tax payer and 49 year homeowner on Hawai'i Island, I urge you to REJECT (Do Not Accept) the Final EIS on Pohakuloa (PTA) for the following reasons:

1. The Final EIS says that military practices at Pohakuloa have started 1261 fires since 1975.
2. Furthermore, the Final EIS says the wildfire risk will only increase in the future due to climate change.
3. Pohakuloa is classified as a State Conservation District. This designation is the highest protected land category.
4. Live firing exercises and pollution by the Army are completely incompatible in a conservation district.
5. Is PTA polluting the aquifer beneath the base? Perhaps! WHY is the military not using the two water wells at PTA and instead is paying millions of dollars each year to haul water to PTA.

For these reasons, I urge the BLNR to REJECT the Final EIS at PTA.

Respectfully submitted,

Jeffrey Mermel
PO Box 342
Volcano HI 96785

From: [Jayson Mizula](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa EIS
Date: Wednesday, May 7, 2025 10:20:46 PM

As a long-time Hawai'i resident and a combat veteran, I urge you to do the right thing and reject the army's environmental impact statement. Please put the environment first, please put the people first, please put the future first and do not renew the lease of Pōhakuloa. The land needs to heal, not continue to suffer.

It doesn't take an expert to see the US and it's military have never anticipated the true environmental impact or any negative consequences of their actions.

You have an opportunity to do the right thing
The military doesn't deserve one more second in control of Pōhakuloa or anywhere else in Hawai'i.

From the devastation of Kaho'olawe and the unexploded ordnance left behind on every island including Molokai's Kalaupapa peninsula, to the contamination of Oahu's aquifer, navy raw sewage dumped into pearl harbor and space force fuel leaking atop Haleakala, to the remnants of agent orange, white phosphorus & depleted uranium leeching into the earth, to the wildfires started by bombing dry invasive grasses, to invasive species like the COCONUT RHINOCEROS BEETLE arriving on unchecked military aircraft, to the violent crimes committed by military members against local women and children, to the military's generous housing allowance exasperating Hawaii's housing crisis, the impact and consequences of the military's presence have been severe for Hawai'i and it's people.

The renewal of the military's lease of Pōhakuloa, like the continued militarization of Hawai'i & the Pacific in general, would be making the people of Hawai'i, the United States, and the world less safe, not more. It is in the interest of weapons manufacturers, not humanity and certainly not the environment.

Jason Robert Mizula
Honolulu, HI

From: [JMS](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Hear Our Cry
Date: Wednesday, May 7, 2025 10:35:30 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 'oia'i'o,
Jozette Momoa-Smythe
Kānaka Maoli

From: [Jake Muise](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] TESTIMONY BLNR Agenda Item: Army Training-Land Retention at Pōhakuloa Training Area - Disapprove
Date: Wednesday, May 7, 2025 10:34:17 PM

WRITTEN TESTIMONY

BLNR Agenda Item: Army Training-Land Retention at Pōhakuloa Training Area

Date of submission: 07/05/25

Jacob Muise, resident of Kahua, Hawaii.

1 ▪ Action Requested

I respectfully urge the Board of Land and Natural Resources (BLNR) to DISAPPROVE the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of approximately 22,750 acres at Pōhakuloa Training Area. Under HAR § 11-200.1-23(e), an EIS is deemed accepted if no decision is issued within 30 days. A silent acceptance would violate BLNR's proactive, preventative fiduciary duty affirmed by the Hawai'i Supreme Court in *Kahaulelio v. DLNR* (2019).

2 ▪ Four Hard-Stop Failures

****Failure 1 – Undefined Deal Terms (HAR § 11-200.1-13 completeness rule)****

The Executive Summary (p ES-14) and Volume I, § 2.3 (p 2-2) state that *“the form of the real-estate interest ... is unknown”* and *“the duration is also unknown.”* If acreage, boundary, and term are blank, BLNR cannot measure impacts or benefits. Approval under such uncertainty would be arbitrary and capricious.

****Failure 2 – Nominal Rent & No Cleanup Bond (HRS § 171-36; Trustee Duty of Loyalty)****

Lease S-3849 (Appendix F, pp 4–5) fixes payment at *“ONE DOLLAR (\$1.00) for sixty-five (65) years.”* There is no inflation clause, no performance bond, and the Army may terminate on six-months' notice. Meanwhile, UXO and PFAS remediation could exceed one hundred million dollars. A trustee must not exchange ceded conservation land for nominal consideration while absorbing huge liabilities.

****Failure 3 – Unfunded, Post-Dated Mitigation (HAR § 11-200.1-24(q))****

Every new mitigation measure—wildfire cameras, cultural-access plan, fencing—will start *“no later than October 2028 ... as funding becomes available.”* (Volume I, ES Table ES-4, pp ES-13–14). Promises contingent on a future congressional appropriation are not enforceable and do not satisfy HEPA's requirement that unresolved issues be fixed *“before”* an action is approved.

****Failure 4 – Missing Aquifer Protection Data (Public-Trust Water Duty, Waiāhole I)****

Volume I, § 2.3 footnote (p 2-25) concedes that live-fire “may affect regional aquifers and watersheds,” yet supplies no tracer study, vertical bore logs, or monitoring-well network. Ka Wai Kapu a Kāne—the 4,500-ft saddle aquifer—is Hawai‘i Island’s most pristine water source. Approving the EIS without hydro-geologic data contradicts the Supreme Court’s instruction that trustees must act on the best available science.

3 ▪ Independent Expert Warnings

- **U.S. EPA Region 9** (Appendix N) requests depleted-uranium plume modeling, PFAS delineation, a full UXO inventory, and consideration of shorter lease terms.
- **DLNR Office of Conservation & Coastal Lands** calls the Army’s conservation-district compliance claim “incorrect” and describes dump-site proliferation as “alarming.”
- **Commission on Water Resource Management** and **DOH-HEER** seek hydro-geologic modeling, new monitoring wells, and PFAS investigation.

4 ▪ Readiness & Jobs – Myth vs. Record

Claim: “PTA is indispensable for Indo-Pacific readiness.”

- **EIS fact:** PTA reached full capacity on only ~50 % of available training days; live-fire events are “episodic.” (Volume I § 2.3.3, p 2-24). A half-utilized range is, by definition, replaceable.

Claim: “Airspace is heavily used.”

- **EIS fact:** Restricted Airspace R-3103 was activated 147 days in two years—about one day in five (Volume I § 3.4, p 3-64). This is moderate, not critical, usage and can be rescheduled elsewhere.

Claim: “No alternative live-fire venue exists.”

- **EIS fact:** Alternatives rely on a 2017 internal study; the document never reevaluated options after the Army established the Joint Pacific Multinational Readiness Center (2021-24) that already conducts brigade-level live-fire in Alaska and Guam (Volume I § 2.3.6, p 2-31).

Claim: “Lease fuels local economy & jobs.”

- **EIS fact:** No PTA-specific payroll table appears in any volume. Volume I § 3.16 (p 3-285) identifies only **three** State wildfire positions tied to the leased parcel. Meanwhile, the lease rent remains \$1 for 65 years, while DLNR forest-carbon pilots value saddle lands at roughly \$80 per acre-year—an opportunity cost of at least \$1.8 million annually.

5 ▪ Additional Red-Flag Lease Clauses

- **Free extraction rights:** Lease § 23 grants the Army unrestricted use of all ground and surface water and quarry rock (Appendix F, p 11).
- **Cleanup cost cap:** Lease § 29 limits liability to the land’s fair-market value (Appendix F, pp 12-13).
- **Army adjudicates breaches:** Lease § 30 assigns disputes to the Army District Engineer; appeals go to the Secretary of the Army (Appendix F, pp 13-14).
- **Inspections optional:** Court-Ordered Management Plan log notes inspections are “recommended” and “subject to funding availability” (Appendix N).

- ****Self-inspected UXO clearance:**** Range SOP relies on units to police their own dud removal (Appendix E).

6 ▪ Proposed Motion Language

“The Board finds the Final Environmental Impact Statement incomplete under HAR § 11-200.1-24 because it lacks defined lease terms, duration, cleanup funding, aquifer-protection data, and enforceable mitigation schedules; because EPA, NPS, CWRM, DOH-HEER, and DLNR-OCCL identify unresolved data gaps; and because mitigation is postponed until FY 2029 contingent on future appropriations. The Board therefore DISAPPROVES the EIS and directs staff to develop a cleanup-performance bond and monitoring-well framework as prerequisites to any future disposition at Pōhakuloa.”

Closing

A \$1-per-century lease that postpones mitigation, lacks hydro-data, contains a cost-cap escape hatch, and lets the lessee judge its own breaches cannot meet Hawai‘i’s constitutional standards. Please reject the Final EIS and require the Army to return with a cleanup-first, data-driven plan backed by enforceable funds.

Mahalo for safeguarding our ‘āina and wai for present and future generations.

Jacob Muise

From: [Kuulani Muise](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in Opposition to the U.S. Army's Final EIS for Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 11:08:07 PM

Aloha Land Board Members,

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of up to 22,750 acres at Pōhakuloa Training Area. I respectfully urge the BLNR to exercise its statutory authority under HRS § 343-5 to reject this legally deficient document. As the body charged with fulfilling the State's constitutional mandate to "conserve and protect Hawai'i's natural beauty and all natural resources" (Article XI, Section 1), the Board has not just the authority but the affirmative legal obligation to deny acceptance of an EIS that so fundamentally fails to meet the standards established in HAR § 11-200.1-13 for content requirements of environmental impact statements.

Critical Material Omissions Render the EIS Legally Deficient

The Final EIS is fundamentally incomplete as it fails to specify essential terms that are necessary for the Board to make an informed decision. As documented in Volume III of the EIS itself, critical information is missing regarding:

1.
The form of real- estate interest (fee, lease, easement, exchange) the Army seeks
2.
The duration of the proposed land retention, which the Army admits "is unknown" and "must be negotiated later"
3.
Specific lease conditions and performance guarantees for restoration, cleanup, and access
4.
A comprehensive cleanup and restoration plan with associated costs

The Army's own language throughout the document—"unknown," "to be negotiated," "as funding is available"—demonstrates that this EIS fails to meet basic legal requirements for completeness. Under HAR § 11-200.1-24, an EIS "shall contain a summary of unresolved issues and either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the issues." The Army has provided neither.

Inadequate Protection of Ka Wai Kapu a Kāne

As a Wai a Kāne practitioner, what is of paramount concern to me is the EIS's alarming failure to adequately address threats to Ka Wai Kapu a Kāne—our sacred water sources. Research has

confirmed what our ka'ao and mele have told us for millennia—the existence of an extensive freshwater aquifer beneath Pōhakuloa. Sitting at approximately 4,500 feet elevation, it has been described as "one of the most pristine aquifers in Hawai'i" that is "the deepest, the widest" on the island, vital to our water security and cultural practices.

According to Ka Wai Ola (September 2024), this aquifer is "likely the largest in the pae 'āina and a critical freshwater resource for the island." The continuation of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these essential and irreplaceable water sources.

Notably, the Commission on Water Resource Management (CWRM) has explicitly requested a comprehensive hydro-geologic study and monitoring wells in their comments on the EIS, while DLNR's Engineering Division has flagged flood-control and drainage uncertainties. DOH Hazard Evaluation & Emergency Response (HEER) has also requested PFAS and lead investigations. These State agency concerns remain unaddressed in the Final EIS.

It's particularly alarming that the Army's primary interest in the aquifer appears to be for military use rather than protection—the U.S. Geological Survey publication (USGS OF-2009-1135) reveals that the Army conducted magnetotelluric surveys of the aquifer because they are "in need of a reliable potable water supply to sustain ongoing operations."

Confirmed Depleted Uranium Contamination

The Army initially denied using depleted uranium (DU) in Hawai'i, but in 2007 was forced to confirm the presence of DU at both Schofield Barracks and Pōhakuloa Training Area. The DU originated from the Davy Crockett Weapon System, a battlefield nuclear-capable weapon tested in Hawai'i in the 1960s. Each M101 spotting round contained approximately 6.7 ounces of DU alloy (92% DU, 8% Molybdenum). When DU rounds explode or are disturbed by ongoing live-fire exercises, uranium particles can become aerosolized and carried by wind across Hawai'i Island.

U.S. EPA Region 9 (October 8, 2020) formally warned that the Army must "clearly identify all contaminated areas... including the extent of depleted-uranium contamination... and the potential for off-range migration via air/dust and storm-water runoff." The EPA also advocated for shorter lease terms and a mitigation-heavy alternative.

Independent citizen radiation monitors have "detected radiation levels three to four times background levels in public areas around PTA" and documented "radiation spikes of 62 counts per minute" at locations five miles from PTA, according to residents of Waiki'i Ranch (Big Island Video News, June 2017).

Expert comments in the EIS flag the Army's depleted-uranium monitoring as using methods "insufficient to properly quantify impacts," effectively guaranteeing non-detection. Sediment samples were taken in places with no hydrologic connection to impact areas, undermining conclusions that DU is immobile.

Inadequate Mitigation Measures: Unfunded and Deferred

All new mitigation measures proposed in the Final EIS—including access for cultural practitioners, wildfire cameras, fencing, invertebrate studies, etc.—will only start "no later than October 2028"

and "as funding becomes available." The EIS explicitly states: "Should funding be available prior to FY 2029... measures will be implemented."

This approach fundamentally violates the principle that mitigation measures should be conditions precedent, not conditions subsequent. BLNR should require mitigation funding and schedules up-front, not after a lease is signed.

Incomplete and Inadequate Documentation of Unexploded Ordnance

The EIS fails to adequately address the Army's legal obligation to clear unexploded ordnance (UXO) from the training area. A Hawai'i judge has previously ordered state officials to submit a plan for monitoring and inspecting ordnance cleanup at Pōhakuloa, finding that the Army had breached its lease obligations by not cleaning up UXO.

The Army's own 2015 UXO memo on the Bazooka Range states: "Coupled with its accessibility to the public, the density of ordnance presents an imminent and substantial endangerment to public health and welfare."

Yet the Final EIS defers the entire UXO/contamination issue to an undefined, future CERCLA process. The Court-Ordered Management Plan (COMP) progress log in Volume III concedes inspections are merely "recommended" and "subject to funding availability." As the testimony rightly asks: "If inspections themselves are optional, how can BLNR attest the land is being safeguarded?"

Cultural Access and Traditional Practice Concerns

The Army's own Cultural Impact Assessment recorded 240 survey responses (63% completion) citing Makahiki ceremonies, burial care, gathering, and mo'olelo tied to the leased parcel. Traditional knowledge identifies Pōhakuloa as "a place set apart, a space meant for elemental spirits rather than human beings" and notes it contains "countless iwi kūpuna."

The Final EIS itself acknowledges that the No-Action Alternative (not renewing the lease) would have "significant beneficial impacts on land use, cultural practices, and environmental justice"—a clear admission from the Army that their continued presence harms these interests and life ways.

Legal Deficiencies of the EIS

This EIS is legally deficient under HAR § 11-200.1-24, which explicitly requires resolution of outstanding issues. The Army's proposal is located within Conservation District lands, subject to DLNR's exclusive jurisdiction under HRS § 183C-3, where permissible uses are strictly limited under HAR § 13-5.

The Army's activities—including live-fire training and bombing—constitute a violation of HAR § 13-5-30(c)(4), which requires that the proposed land use "will not cause substantial adverse impact to existing natural resources within the surrounding area, community, or region."

The National Park Service notes that PTA "minimally overlaps" the Mauna Kea National Natural Landmark—one of, if not the most geologically significant shield-volcano sites on earth. Approving live-fire next to a designated landmark (one that is incredibly culturally significant, no less)

conflicts with BLNR's caretaker role and creates additional legal exposure.

Binding Legal Precedent: Kahaulelio v. DLNR (2019)

The 2019 Hawaii Supreme Court ruling (*Kahaulelio v. DLNR*) unanimously found that the State breached its trust duties by failing to properly monitor and inspect the lands at Pōhakuloa, allowing the area to fall "into ruin" through neglect and military misuse. This landmark ruling emphatically established that military usage of Pōhakuloa is fundamentally incompatible with the land's conservation district designation and creates a binding precedent that compels rejection of this EIS.

The Court ruled that "as trustee, the State must take an active role in preserving trust property and may not passively allow it to fall into ruin." The court recognized the BLNR's duties as "proactive and preventative" – meaning the Board must anticipate and prevent harm before it occurs, not merely respond to it.

Army's Own Final EIS Acknowledges Significant Adverse Impacts

The Army's Final Environmental Impact Statement (April 2025) explicitly acknowledges that under all proposed alternatives (Alternatives 1, 2, and 3), "significant adverse impacts could occur on land use (land tenure), biological resources, cultural practices, and environmental justice." The Army claims to have "identified measures in the Final EIS to mitigate these adverse impacts," but as demonstrated above, these proposed mitigations are wholly inadequate, unfunded, and lack enforcement mechanisms.

Notably, the Final EIS admits that the No-Action Alternative (not renewing the lease) would have "significant beneficial impacts on land use, cultural practices, and environmental justice"—a clear admission that the military's current and proposed future use of these lands is harmful to Hawaii's environment, culture, and people.

The Precautionary Principle and Public Trust Doctrine

Under the precautionary principle, firmly established in Hawai'i environmental jurisprudence by the Supreme Court in the Waiāhole cases and reaffirmed in *In re 'Āao Ground Water* (128 Hawai'i 228, 287 P.3d 129), the Board has a legal obligation to reject activities that pose potential threats to public trust resources when scientific uncertainty exists. The Board's failure to reject this EIS would itself constitute an independent breach of trust duties actionable under HRS § 607-25, which provides for citizen suits to enforce environmental laws.

Federal and State expert agencies—including EPA Region 9, NPS, DLNR-CWRM and DOH-HEER—have formally advised that the Final EIS omits critical data on DU contamination, aquifer vulnerability, PFAS, flood routing, and cultural-landmark overlap. These uncertainties trigger the precautionary principle and compel rejection.

I therefore urge this Board to fulfill its constitutional and statutory obligations by rejecting this legally deficient EIS, as anything less would constitute an abdication of your sworn duties as trustees of our public lands and waters.

The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental issue but a matter of cultural perpetuation, water security, and intergenerational justice for all of Hawai'i

Island. If we have learned anything from the Red Hill water crisis, it should be that we cannot trust military assurances about protection of our water resources, and we cannot wait until after contamination has occurred to take action.

Explicit Rejection Rather Than Default Acceptance

I respectfully acknowledge the Board's significant workload and the complexities of this issue; however, in a matter of such critical importance to our islands' environment, water resources, and cultural heritage, allowing this EIS to be accepted through procedural default rather than substantive review would constitute a severe abdication of the Board's constitutional and statutory responsibilities to protect public trust resources.

I strongly urge the Board to schedule a vote on this Final EIS before the 30-day deadline and to explicitly reject the document based on the substantial legal, procedural, and scientific deficiencies outlined above. Failing to take explicit action, and thus allowing default acceptance, would not only undermine public confidence in the environmental review process but would potentially expose the Board to legal liability under the public trust doctrine as established in the Waiāhole and Kahaulelio cases.

Me ke aloha 'āina,

Ku'ulani Mui

Kahua, Hilopālikū, Hawai'i

From: [1marleyfan77](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT Army final EIS
Date: Wednesday, May 7, 2025 10:50:34 PM

Aloha,

For years, concerns around Pōhakuloa and other issues have been ignored, downplayed, or pushed through without real community engagement. From the lack of oversight on military training impacts, to inadequate enforcement of land stewardship responsibilities, the public has too often been left out of decisions that affect our ‘āina.

The EIS offers little analysis of freshwater (wai) and its importance in Native Hawaiian culture. It does not explain how military activities might affect these important resources.

Groundwater beneath PTA could be at risk, but the EIS doesn't include a full hydrogeological study to understand the long-term impacts of potential contamination.

While the Army says it tries to reduce water pollution, the EIS does not list specific monitoring programs to track contamination risks to groundwater over time.

Finally, there is no financial guarantee mentioned in the EIS to make sure cleanup or restoration will actually be completed in the future.

Mahalo,
Summer P. Noland

From: [Valerie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pohakuloa
Date: Wednesday, May 7, 2025 11:08:15 PM

My name is Valerie Ann Ornellas. My ancestors have been in the Hawaiian islands since the late 1800s. I am a 4th generation citizen of Hawaii. The final Environmental Environmental Impact Statement (EIS) should not be approved. The question is what kind of Hawaii will my grandchildren have when they grow older. Preserve and restore the land,. Clean up what has already been destroyed.

When is enough abuse to our aina going to stop? Is not 60 years of abuse to Hawaiian land ever going to stop? The pollution to and contamination of our precious land is a reflection of the colonial attitude of the United States of America. It's about time that BLNR do something for Hawaii's people. The military has proven their lack of stewardship on Kahoolawe, multiple tracts of land on Oahu and other areas. Wake up BLNR and represent Hawaii's cultural and environmental heritage. It's time to stand up for what is pono. Make it right!

Mahalo,
Valerie Ornellas
Wailua Homesreads, Kauai
Sent from my iPad

From: [Avalon Paradea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 10:57:47 PM

Aloha kākou, my name is Avalon Paradea and I am from Waikōloa, Kohala Hema, Moku o Keawe. I am writing to share my objection to the Final Environmental Impact Statement (FEIS) written in regards to the US Army's desire to retain 22,750 acres of State leased lands within the Pōhakuloa region.

First, I would like to detail my extreme disappointment in the responses I received on my comments on the second draft EIS:

Chemicals: In discussing my concerns with cumulative heavy metals and other harmful chemicals, I received no helpful feedback. I mentioned that the rapid accumulation of chemicals listed in 3.5.4.3 at the BAX V-10 is alarming and should be seen as a dangerous problem. The feedback I received included the ridiculous following statement: "...risk of contaminants mobilizing is not a concern as limited surface water and groundwater pathways on the State-owned land pose minor potential impact to soil and groundwater quality. The best available scientific data for groundwater and surface water quality was incorporated into this EIS." This is a wordy way of stepping around my very clear concerns and not addressing them directly.

Noise: I shared my experience in hearing military training from my home in Waikōloa, similar experiences of others in my region, and how these noises are disturbing. This was effectively dismissed in the Army's response. I also shared that there is ample scientific evidence that supports the harsh reality that such noises disturb wildlife; to this, I received the following response: "Section 3.3.4.4 acknowledges that noise can adversely impact wildlife and also provides studies that demonstrate wildlife noise habituation." If we are going to be realistic here, habituation is a rarity and my personal observations within the Pōhakuloa region support the truth that native birds and other wildlife are disturbed by military activity, both in response to noise and other effects. The Army does not care about the wellbeing of our more-than-human communities.

Erosion: I shared my concerns in regards to reduced native vegetation and the exposure of soils. In response, I got: "Impacts from maneuver training activities are monitored and managed through implementation of the ITAM program, which utilizes Best Management Plans to reduce erosion and runoff." This has to be a joke. There is no reduction in regards to erosion, soil exposure, or runoff. Anyone can see that the State leased lands have been, and continue to be, heavily degraded due to training activity. It is later mentioned that a fugitive dust air monitoring program was set up at PTA; I must insist on reiterating that such programs continue to fail in assessing how activity at Pōhakuloa leads to airborne dirt and

other elements in places downslope, including Waikōloa. I invite personnel to visit my home during one of our common dust storms and see how much they enjoy sitting on my lanai as dirt pelts down from upslope.

Water: Wai is precious and sacred. I am sick of seeing the Army continuously act as though water is anything less than the most vital element we, and all life, require to live. The EIS states, “the uniqueness [of this groundwater] is ‘irreplaceable’; and the vulnerability to contamination is classified as ‘High.’” And yet, in response to my concerns over water contamination, I received a long-winded description of how water contamination is not a concern. Contradictions abound.

Socioeconomics: I explained that the Army only employs around 1% of our population on Hawai‘i Island, and received a snarky retort that the Army actually employs 2.2% of the population when viewed in regards to the working population. This was a nitpicky and useless distinction. I also received the statement: “Additionally, employment is not the only metric used to analyze socioeconomic impacts on the local economy.” This statement should have been better explained; as it stands, it is vague and uninformative.

Cleanup: The Army continuously skirts around the very big, very serious issue of cleaning up their messes across the State leased lands. It is glaringly obvious that there is no intention in any such cleanup, regardless of the 2019 Ching vs. Case decision. I do not trust the Army to make things right in any capacity. The military never cleaned Kaho‘olawe, and I know Pōhakuloa won’t be any different. The Army is happy to defy the law and joyful in destroying ‘āina.

Destruction of ‘ōhi‘a: I shared a personal experience, while working at Pōhakuloa, of observing several ‘ōhi‘a trees that had been shot to death by military personnel. All I got in response was: “The Army takes management responsibilities very seriously as outlined in Table 3-12: Best Management Practices and Standard Operating Procedures Supporting Species and Habitat Management.” A boldfaced lie, truly. There is no care, no concern. I have no idea what this response was supposed to elicit from me, as it is basically a senseless word salad that does nothing to undo the serious harm I observed, let alone prevent similar violence from happening again. The Army would rather kill endangered wildlife and open our suffering ‘ōhi‘a for further contamination from ROD than to hand out repercussions to those who have bypassed their so-called “rules.”

I worked at Pōhakuloa as a cultural resources technician and specialist for 3.5 years and I have witnessed numerous atrocities across that landscape, many of which occurred on the State leased lands. While I worked there, artifacts were housed in an old quonset hut with structural issues, showing how little the military cares for the material past. There are iwi kūpuna throughout the region who deserve to rest and cannot do so while the land is being actively harmed. There are hundreds of fires caused by Army activity that have ravaged the

region. This includes the 2018 fire that occurred in a large section of land that had not previously been documented by the cultural resources team; when we finally began fieldwork, everything was charred and sites of interest had been compromised, artifacts destroyed in some instances. I anticipate that one day, we will experience a military-induced fire that will force our community in Waikōloa to evacuate, potentially razing the town entirely. There are piles upon piles of trash scattered everywhere, from bullet casings to MRE packages to electronics and everything in between.

My mother has been mysteriously ill since 2011 and suffers from a severe cough. Similarly, I have been ill since 2021. We live in Waikōloa, downwind from the training area. Our air quality is poor due to airborne particulates that rain down upon us from the Pōhakuloa region. This is an objective, observable fact. There has not been adequate testing to determine how such effects impact the health of nearby communities.

As long as this region is occupied by the US military, Kānaka 'Ōiwi are being actively disrespected and harmed. Individuals and practitioners who hold pilina with Pōhakuloa cannot safely visit this sacred landscape whenever they feel called to do so. 'Ike Hawai'i has been entirely thrown out in favor of letting a system of war decimate a complex ecosystem that fed hundreds of thousands of lives, human and otherwise, for countless generations. This region is classified as a conservation district; allowing the Army to use this space flies in the face of reason and sets a dangerous precedent. Preventative measures are a falsehood; no matter what, military occupation at Pōhakuloa will result in life-changing, intergenerational, long-term damage. The emotional, spiritual, and physical pain inflicted upon this land is palpable. For shame.

In conclusion, the FEIS is a poorly written document that does little to properly capture the full range of negative impacts caused by Army occupation. I reject this document and argue that it does not reflect the full scope of why these lands must be removed from military oversight. The alternative Actions provided in the FEIS are not well defined. The No Action Alternative remains the only sensible option. More explicitly, the only choice should be for the State leased lands to be returned to the State in such a way as to preserve them for proper stewardship by Kānaka 'Ōiwi community members and organizations henceforth.

I implore members of the BLNR to reject the FEIS and for the State leased lands at Pōhakuloa to be liberated from military occupation once and for all.

Mahalo for doing what is pono. Mālama 'āina, aloha 'āina, always.

Avalon Paradea

--

Avalon Paradea (they/them)

‘Āina-based creative, steward, & educator

MS, Tropical Conservation Biology and Environmental Science

www.avalonparadea.com

IG [@avalon.dawn.art](https://www.instagram.com/avalon.dawn.art)

Mālama ‘Āina, Aloha ‘Āina. All ways, always.

From: [JULIE PAUL](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the EIS for POHAKULOA
Date: Wednesday, May 7, 2025 10:06:35 PM

The EIS for Pohakuloa is inadequate and does not fully address the dangers of the area. Every year they invite local school students to come and this is extremely bad for their health.

I have tested high in uranium and retested 2 months later with the same results. I moved to the Big Island in 1978 and travelled to Kona too many times to count.

Due to my exposure I have done quite a bit of research. My exposure could lead to a higher risk of cancer.

It is common knowledge that the military has used depleted uranium in the weapons used at at Pohakuloa. It is also known the breathing in the slightest bit of uranium is poison to the body and one of the causes of cancer.

Please stop telling the public that it is safe at Pohakuloa. Please stop approving the military permits allowing for the use of depleted uranium. Please commit to a complete and full review of the entire area of Pohakuloa including a new EIS.

Aloha,

Julie Paul

From: davidsher@juno.com
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 9:58:27 PM

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

After 60 years of abusing Hawaiian land to be bombed, burned, and polluted, the army now has the audacity to submit a thoroughly inadequate FEIS for its continued use of public, “ceded” lands at the Pohakuloa Training Area (PTA) on Hawaii Island. Your own staff have raised serious concerns, citing the Army’s failure to follow basic legal requirements and its repeated disregard of clear and specific guidance.

This is unacceptable. I urge you to do the honorable thing and **REJECT the FEIS** put forward in Agenda Item D-1.

Mahalo for the opportunity to testify.
Sherry Pollack

From: [Ryan L](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to Army's Ideas for Pōhako
Date: Wednesday, May 7, 2025 10:10:58 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,
Ellie Lashlee Preciado

From: [Sabrina Prentice](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: We Demand BLNR to Reject the U.S Army's Pōhakuloa FEIS
Date: Wednesday, May 7, 2025 10:12:19 PM

Aloha Chair Case and Members of the Board of Land and Natural Resources. I am writing to implore you 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 on Hawai'i Island.

The FEIS has failed to meet the basic requirements of Hawai'i's environmental review laws and has not provided the public or this Board with any of the facts or information needed to make an informed or lawful decision on the matter. Instead of addressing concerns raised during the draft process, the Army's final document only raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

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

Overall, it is clear that if given the jurisdiction, the Army will continue to poison our soil and disturb the natural ecosystem of Pōhakuloa all while remaining vague and untruthful about the impact of their destruction. This is why I am asking you to reject this FEIS and require the army to conduct a full and lawful environmental review, complete with transparent data and a credible cleanup and mitigation plan. It is for the good of our island and its inhabitants that the Army is held accountable for the damage inflicted onto the land that they exploit. I have faith that this board will make a choice in this matter that serves to protect Hawai'i and its people.

Sincerely,
Sabrina Prentice

Kamuela, Hawai'i
sabrinap1110@icloud.com

From: [Shannon Rudolph](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT POHAKULOA EIS
Date: Wednesday, May 7, 2025 10:02:26 PM

Aloha,

I've been following this issue for decades.

The military has been TERRIBLE stewards of Pohakuloa from the very first weapon fired. The lease said they were supposed to clean up the ammo after every training, & it never happened once in many decades. The DLNR/BLNR are equally to blame for not holding them to their AGREEMENT for clean up.

Who knows what other toxins are scattered across these precious CONSERVATION lands, along with radiation contamination.

The E.I.S. is garbage and FAILS to address so many crucial issues.
DO NOT ACCEPT THIS EIS.

We know it's junk, and you know it's junk, too.
Stop kicking this can down the road.

Mahalo,

Shannon Rudolph - Kona
40 year Hawai'i Island resident

From: [Jack Runburg](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT the army's FEIS on Pohakuloa
Date: Wednesday, May 7, 2025 10:43:50 PM

Aloha,

I am writing today to voice my strong opposition to the United States military's continued occupation of Hawaiian lands. In particular, I urge the BLNR to reject the recent FEIS submitted by the army.

The BLNR has a duty to protect this land as executors of the states trust responsibilities. The military has destroyed countless acres of land across Hawaii. Kahoolawe, Makua, Pohakuloa, Red Hill. They have never been and never will be good stewards of these lands. In fact, the most recent FEIS provides no sufficient plans for mitigation of damage and pollution to the land. Because their interests are against the health of the land, BLNR must be against their interests.

BLNR has a responsibility to the people of Hawaii, who it serves, to reject this FEIS because the military cannot take care of the land at Pohakuloa.

—Jack Runburg

From: [Raquel Runnels](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area
Date: Wednesday, May 7, 2025 10:17:30 PM

Aloha Chair Chang and Members of the Board,

My name is Raquel Runnels, a Kānaka Maoli residing on O‘ahu. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army’s proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen ‘āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this ‘āina.

The most egregious failures of the FEIS 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.

'O au iho nō me ka 'oia'i'o,
Na Raquel S. Runnels
Wāhiawa, O'ahu
Pacific Justice & Reconciliation Center

Sent from my iPhone

From: [Syrissa Sacca](#)
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 11:41:44 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 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.

Please do the right thing. Allow the Land & its people behind to heal.

Me ka 'oia'i'o,
Syrissa Sacca
Hamakua Coast, HI
Land Steward / Student
Syrissa.sacca@gmail.com

From: [Katie Smither](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Hilo Resident Testimony on Pōhakuloa Training Area: Please Reject EIS & Lease Renewals
Date: Wednesday, May 7, 2025 10:43:26 PM

Aloha BLNR and whom it may concern,

Thank you for taking the time to receive and read testimony regarding lease renewals at Pōhakuloa Training Area (PTA). I am writing to ask you **please reject** the Final EIS in PTA's effort to continue leasing ~22,750 acres of state land and reject any lease renewals for state-owned lands.

Here on the island, we have witnessed the accelerating degradation of land condition at Pōhakuloa Training Area and the general area that is direct result of the ongoing activities at PTA and the lack of conservation effort to offset or compensate for the damage. It is obvious to me PTA has failed any commitment as a steward of these leased lands and therefore the lease should not continue. These negative impacts to the leased lands impact all of us living here.

I have witnessed in my daily drives past PTA:

1. Destruction of plant life and top soil condition resulting in increasing airborne dust and low visibility on windy days, which will likely get worse in the drying climate
2. Serious fires that spread downslope and destroy entire ecosystems on and off the PTA leased lands, which will likely further threaten our communities especially in the Waikoloa area
3. Destruction of plant life due to failing management of invasive species like goats and sheep which graze much of PTA leased lands to the dirt, making it impossible for native species to grow or recover
4. Nearly irreparable litter of ordinances across the land, the contents of which are unknown and have the potential to contaminate both land and water
5. Irreparable destruction of land through cinder mining for roads and construction
6. Destruction of native plants through the above activities, threatening species like māmane which many native birds need to survive in the area
7. Destruction of public resources like peace and quiet in nearby national parks, where citizens camping or hiking on Mauna Loa's slopes can still hear bombing at PTA

The activity at PTA is in direct conflict with citizen's needs and interests for the state lands of Hawai'i. As a taxpayer, I would like to see this EIS rejected and no leases renewed at Pōhakuloa Training Area. Please stand with the residents and reject the EIS and lease renewals at PTA.

Mahalo,

--

Katie Smither

--

84 Hoolaulea St
Hilo HI 96720

From: [Kapono S.](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Re: Testimony to the BLNR to REJECT THE ARMY EIS
Date: Wednesday, May 7, 2025 11:23:44 PM

Testimony Regarding Agenda Item D1 - Final Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhakuloa Training Area

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

I respectfully submit this testimony in absolute opposition to the acceptance of the Army's Final Environmental Impact Statement (EIS) for the continued leasing of lands at Pōhakuloa Training Area (PTA).

I call upon those who serve on the BLNR to reject this EIS on the following critical grounds:

1. Constitutional Breach of Public Trust Lands

The State of Hawai'i has a constitutional obligation under Article XII to protect and preserve public trust lands for the benefit of Native Hawaiians and the general public.

The Hawai'i Supreme Court has already ruled in *Ching v. Case* (2019) that the State breached its trust duties by failing to properly monitor and enforce the terms of the original lease.

Accepting this EIS would perpetuate this breach of trust for another 65 years.

The court explicitly found that the State has "an affirmative duty to preserve and protect the trust property," which has not been fulfilled at PTA.

2. Grossly Inadequate Compensation

The current lease rate of \$1 for 65 years represents an unconscionable undervaluation of these sacred and valuable public lands.

This nominal fee fails to provide fair market value as required by law and fails to generate adequate funds for proper land management.

A new 65-year lease at similarly token compensation would constitute a continued theft of public resources and deprive the State and beneficiaries of millions in rightful revenue.

The EIS fails to address fair market valuation or acknowledge the true economic cost of this arrangement.

3. Fundamental Incompatibility with Conservation

The lands in question are designated Conservation District lands that should be protected for future generations.

The documented contamination from depleted uranium, unexploded ordnance, and other military toxins directly contradicts conservation principles and the land's intended purpose.

Military training involving live-fire exercises and bombing is inherently destructive and cannot coexist with conservation objectives.

The EIS inadequately addresses these fundamental contradictions and fails to propose meaningful remediation for decades of environmental damage.

4. Inadequate Consultation and Cultural Impact Assessment

The EIS fails to adequately address impacts to Native Hawaiian traditional and customary practices, cultural sites, and access rights protected under law.

Numerous sacred sites, including heiau and burial grounds, remain at risk, with insufficient protection measures outlined in the document.

I respectfully remind the Board that you have both the authority and the duty to reject this deficient EIS.

The State has already been found in breach of its trust duties at PTA.

Accepting this document would constitute a willful perpetuation of that breach and a MISREPRESENTATION of your constitutional responsibilities.

The rejection of this EIS is not merely warranted—it is legally and morally required to uphold your FIDUCIARY DUTIES to the people of Hawai‘i.

no‘u ihi kapu,
Kaponou Aluli Souza

Kaponou Aluli Souza

www.ksmedical.co

Office: 808.223-9656

Fax: 808.566.0638

E kolo ana no ke ēwe i ke ēwe

The rootlet will creep toward the rootlets.

Those of like mind will seek out the same and support each other.

From: [Geoff Shaw](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D-1 acceptance/non-acceptance of FEIS
Date: Wednesday, May 7, 2025 10:19:13 PM

Dear Chairwoman Chang and other board members

I strongly recommend that the FEIS for continued use of the US military of state conservation lands for training purposes not be accepted. The FEIS does not adequately address the contradiction of using sacred land with numerous endangered and threatened species, historic and cultural sites, and a geologically unstable environment for military training. I would surmise that the main reason for this is that the use is incompatible but I am not surprised that the military continues to ignore that reality. Thank you for considering my perspective

Puna constituent Geoff Shaw

From: [Sie Subi](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please save Pōhakuloa from further desecration
Date: Wednesday, May 7, 2025 10:02:16 PM

Dear BLNR leadership and whom it may concern,

I request that you reject the US army's final EIS of Pōhakuloa. The continued use and abuse of the land, water, and environmental desecration that's been going on for generations needs to end now! The people who live here and call Hawai'i home yourself included benefit nothing from their actions at Pōhakuloa and it's time we put our islands first and take steps in protecting their future. I ask that you be the first step in doing the right thing reject and deny the US army's EIS request. Because my ohana believes no job is worth your soul and judgment before ke akua and I pray you and yours follow that path as well. Mahalo
Sierra Subiono
Kaimuki, Oahu

From: [Amanda Taber](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT the Army's EIS for Pohakuloa
Date: Wednesday, May 7, 2025 10:18:43 PM

To whom it may concern at the BLNR,

I encourage you to reject the army's EIS for Pohakuloa for the following reasons:

- The military has a problem track record of contaminating the land, and not cleaning it up.
- The contamination of the water from the Red Hill fuel tanks is an example of the continued irresponsibly of the military and their continued disregard for this land and disrespect for the people that live here.
- They have repeatedly misused the land without regard to its effect on other ecosystems in our islands.
- They have already destroyed the entire island of Koho'o'lawe.
- Enough is enough!

Mahalo,
Amanda Taber
Sent from my iPhone

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

Date: May 7, 2025

Aloha Chair Chang and Members of the Board,

My name is Lauren Taijeron, and I am a member of **Hui Aloha ‘Āina o Honolulu**. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army’s proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen ‘āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this ‘āina.

The most egregious failures of the FEIS 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 Pōhakuōa, for Hawai'i, and for future generations.

Mahalo for your time and consideration.

Me ka 'ōia'i'o,

Lauren
Honolulu O'ahu

From: [Nicki Tedesco](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, May 7, 2025 11:56:03 PM

Agenda Item D-1 is a slap in the face to every community member who took time to comment, testify, and share their truth. The Army ignored us. Reject this FEIS.

Nicole Ted

From: [Jimmy Trasport](#)
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 10:33:27 PM

Aloha members of the Board of Land and Natural Resources,

My name is James Trasport, Jr 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 and degraded.

Mahalo for your time and consideration,

James Trasport, Jr.
Honoka'a, Hawai'i 96727

From: [Mina viritua jr](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject inadequate EIS for Pōhakuloa and end all illegal leases of Hawaiian Lands to the military especially Pōhakuloa
Date: Wednesday, May 7, 2025 10:10:00 PM

Aloha My name is Mina Viritua Jr and I am a lineal descendant of Puna, Hilo, Kahalu`u, Kona and Miloli`i/Ho`opuloa.

I demand that you folks reject the inadequate EIS for Pōhakuloa and end the lease of our sacred lands the house the biggest freshwater source on the island to the occupiers of our Hawaiian Kingdom. The fact that Hawaii has no treaty of annexation to the US and the continued destruction of Hawaiian lands by the US military will eventually become a war criminal report and I look forward to that day.

The military has shown their disregard for our fresh water sources and the health and wellbeing of our people with bombing of Kaho`olawe, Red Hill and the poisoning of Pu`uloa aquifer and many other polluted `āina across Hawaii Pae `Āina due to military activity.

Please help keep our freshwater source clean and safe from the military and the belligerent occupation of Hawaii by the US. This decision is for the generations to come. What will your mo`opuna say and think about their kūpuna? Did they fight to keep Hawaiian waters clean or did they contribute to the poisoning of ka Wai a Kāne (waters of life)?

Have a great day.

Ke aloha nui,
Mina Viritua Jr

From: [Lehua Waianuhea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in Favor of Rejecting the EIS
Date: Wednesday, May 7, 2025 10:03:51 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 a wahi pana, a sacred and storied place. It is 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

An approval of the EIS would ultimately conflict with the BLNR's constitutional duty to 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 ka mahalo nui,
Lehua Waianuhea
Mokuokeawe, Waiākea

From: [Julie Warech](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, May 7, 2025 11:13:19 PM

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

Date: May 7, 2025

Aloha Chair Chang and Members of the Board,

My name is Julie Warech, community member and member of Jewish Voice for Peace Hawai'i. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

The most egregious failures of the FEIS 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

Best,
Julie Warech (they/them)

From: [Sarah Warren](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Stop military desecration of Pohakuloa
Date: Wednesday, May 7, 2025 10:12:49 PM

Aloha,

I am writing to oppose the ongoing desecration of Pohakuloa by the illegally occupying United States military.

I urge members of the BLNR to reject the fraudulent Environmental Impact Statement, which does not even scratch the surface of the decades of ongoing harm and violence to the land.

The very existence of a military training base anywhere on these islands is an act of ongoing colonial violence that is repugnant at best. In addition, there has been a complete lack of accountability to investigate legitimate concerns about toxins in the air and aquifer created by decades of reckless bombing.

Please reject the EIS and deny lease renewal to PTA.

Mahalo,
Sarah Warren

CONFIDENTIALITY NOTICE: This e-mail message, including any attachments, is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

From: [Robert Wilcox](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Dear BLNR Leadership, I implore you to reject the Army's final EIS of Pōhakuloa. The bombing desecrates the 'āina, causes environmental harm, and contaminates our water. There is no justification for these actions. Please reject the EIS. ...
Date: Wednesday, May 7, 2025 10:10:33 PM

Sent from my iPhone

From: [Kauakea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa bombing must stop
Date: Wednesday, May 7, 2025 9:51:47 PM

As a resident of Hawaii island I stand with the many who ask, know and pray that the aina at Pōhakuloa be returned to the Hawaiian people for restoration.

It is time,

Kauakea Winston
Hāmakua resident

808-754-5698

From: [Jayna](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Wednesday, May 7, 2025 11:02:04 PM

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

My name is Jayna Wong and I am from Kāheʻohe. I am writing to urge you to reject the FEIS in Item D-1. The FEIS is insufficient, fails to include biological and archaeological surveys, and disregards threats to native wildlife. No amount of "training" is worth causing hundreds of wildfires, contaminating the land, and desecrating sacred sites. The occupation of Pōkahuloa causes indisputable and disproportionate harm to the Native Hawaiian community, thus I strongly urge you to REJECT the FEIS in Agenda Item D-1.

Mahalo,
Jayna Wong

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

Date: May 7, 2025

Aloha Chair Chang and Members of the Board,

My name is Mackenzie Ozoa and I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

This EIS is a deeply flawed attempt to greenlight ongoing destruction. It is evasive, incomplete, and in violation of HRS Chapter 343. The Army has provided no assurance of environmental protection, no credible accountability, and no respect for the cultural and political status of this 'āina.

The most egregious failures of the FEIS 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 Pōhakuola, for Hawai'i, and for future generations.

Mahalo for your time and consideration.

Me ka 'oia'i'o,

Mackenzie Ozoa
Kailua, O'ahu

From: [Julia Gilman](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D1. Testimony Opposing Final EIS for Military Use of Pohakuloa Training Area
Date: Wednesday, May 7, 2025 9:35:27 PM

Aloha Board Members,

As a kama'āina I'm opposed to the continued use of public trust lands for military live-fire training, and urgently request you reject the Final Environmental Impact Statement (EIS) submitted by the U.S. Military.

In light of the jet fuel leaks at Red Hill, the military cannot be tasked with self-reporting their methodology for what they consider to be "significant impacts".

In the Final EIS volume 1, Section 3.5 Hazardous Substances and Hazardous Wastes, the Existing Management Measures (Section 3.5.4.14) and whole Environmental Analysis (Section 3.5.6) is unacceptable. For the military to be able to continue to occupy Pōhakuloa based on their own findings and conclusions is unconscionable.

For the sake of upholding DLNR's mission, please reject the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai'i.

Mahalo nui for your time in taking my written testimony.

Sincerely,

Julia M. Gilman
Kapolei, O'ahu