

From: [Cherae Meheula-Solomon](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Thursday, May 8, 2025 6:39:51 AM

Aloha Members of the Board of Land and Natural Resources,

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

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

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

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

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

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

Mahalo,
Cherae Meheula-Solomon
Halawa, Hawaii

From: [Malia Rodrigues](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Thursday, May 8, 2025 6:58:11 AM

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,
Malia Rodrigues
Waimanalo, O'ahu

From: [Alondra Acosta](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 12:16:33 AM

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.

Mahalo nui loa.

From: [Kawika Aipa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT the Army's EIS
Date: Thursday, May 8, 2025 4:08:09 AM

Testimony to Oppose the Army's EIS for Pōhakuloa

Aloha mai kakou,

My name is Kawika Aipa and I urge the BLNR to reject the Army's EIS.

As a Hawaiian, I stand to protect our sacred wahi kūpuna—places that connect us to our ancestors and our spiritual heritage. The proposed military activities at Pōhakuloa threaten to desecrate these sacred sites and further entrench the ongoing colonization of our lands. I have serious concerns that the military is unable to uphold the role of steward of these lands.

The illegal overthrow of our Kingdom, acknowledged by the Apology Resolution (Public Law 103-150), still impacts us today. Our Hawai'i State Constitution and Hawai'i Revised Statutes recognize our rights to protect our cultural and natural resources. International laws, like the UNDRIP, affirm our right to self-determination and consent over our lands.

Many Kanaka Maoli—those born in Hawai'i and those living abroad—are disconnected from their homeland due to systemic barriers like the high cost of living. Future generations deserve the right to access, care for, and honor our sacred wahi, like Pōhakuloa

I also call for demilitarization—to decommission military sites like Pōhakuloa—and to restore our sovereignty. Our sacred sites are not strategic assets—they are life-giving spaces deserving of reverence and protection.

Mahalo for respecting our rights and listening to the voices of our people.

Kawika Aipa
aipatouch@gmail.com

From: [Kylie Akiona](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 12:41:08 AM

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: Noelani Akiona

Date: 8 May 2025

Aloha Chairperson and Members of the Board,

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

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

The most egregious failures include:

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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, snails, 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.

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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. As a kupa'āina o Kipapa, from Ka'ala to Maunakea, our 'āina deserves to be free of military occupation. You have the right—and the fiduciary 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,

Noelani Akiona
'Ewa moku, O'ahu
Hui Aloha Aina o Honolulu

From: [Kara Akiyama](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 12:14:08 AM

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

My name is Kara Akiyama and I am from Honolulu. I respectfully urge you to do the right thing, and REJECT the clearly insufficient FEIS in Item D-1. I am tired of the military blatantly taking advantage of the Hawaiian islands and tired of the violence they do the aina. After the red hill disaster we really need to make clear that we are paying attention to their actions and require accountability and transparency.

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.

Sincerely,

Kara Akiyama

From: [Karine Alvarez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Thursday, May 8, 2025 6:57:04 AM

Aloha, I'm submitting this testimony on behalf of my keiki and future generations. Without proper surveys and consultation, this FEIS is meaningless. Reject Agenda Item D-1.

Thank you

Karine Alvarez

Karine Alvarez

Ola Clinical Skin Care & Massage Therapy LLC

808.298.9512

291 Ho'okahi Street, Suite #206, Wailuku, HI, 96793

From: [Maya Anderson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the U.S. Army's EIS
Date: Thursday, May 8, 2025 2:41:24 AM

My name is Maya Anderson, and I am submitting this testimony in strong opposition to the U.S. Army's Environmental Impact Statement (EIS) and any lease renewal or continued occupation of state lands at Pōhakuloa Training Area.

The U.S. military's use of these lands has caused irreparable environmental damage and ongoing cultural desecration. The EIS fails to fully acknowledge the extent of harm already inflicted on Hawai'i's fragile ecosystems, endangered species, and sacred cultural sites. For decades, military exercises have contaminated the soil and water, destroyed native habitats, and restricted Native Hawaiian access to ancestral lands and practices.

As stewards of Hawai'i's 'āina, it is your kuleana to uphold the principles of sustainability, justice, and cultural respect. Continued military occupation contradicts these values. The Army's EIS is an inadequate attempt to justify decades of environmental degradation, including the presence of unexploded ordnance, toxic waste, and erosion, all of which threaten not only biodiversity but also community health and cultural survival.

I urge you to reject the Army's request for lease renewal. Instead, begin the process of remediation and restoration after decades of continuous environmental assault. The BLNR has a duty to protect public lands—not to perpetuate their misuse.

Mahalo for your time and attention to this critical matter. I ask you to stand for the land, for the people, and for future generations.

From: [Clare Apana](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] ""FEIS for PoDo not approvehakuloa
Date: Thursday, May 8, 2025 6:04:33 AM

Testimony submitted by Clare Apana , President of Malama Kakanilua
Agenda item D1

We urge this board to reject the 'feis and require further information gathering of cultural items disturbed and moved or destroyed and their final disposition . Further archeology is required to be able to determine the need for protection of cultural sites, cultural artifacts, ceremonial objects and most important the need for more information and planning decisions to protect any iwi kupuna.

DO THE NECESSARY FACT FINDING, ARCHEOLOGY AND COMMUNITY CONSULTATION FIRST.MAKE YOUR DETERMINATION WITH ALL NECESSARY INFORMATION TO ASSURE OUR IWI KUPUNA HAVE BEEN PROTECTED.In the Intermediate Court's ruling in Malama Kakanilua b BLNR It was determined that the board did not adequately protect ancestral burials of . It also recognizes the property interest of Malama Kakanilua and plaintiffs to ancestral burials. We ask that this board allow for the protection of our iwi kupuna who are at risk during the activities of the army on these sacred lands. The 'American Indian Religious Freedom law and Hawaii law article 12-7 protects the rights of Kanaka Maoli to their traditional and customary practices of which malama iwi kupuna and malama 'aina are part of.

We do not agree that a 106 process and intervention can be dismissed as unnecessary.

Sincerely,

Clare Apana

Malama Kakanilua

From: [C.Kalā Asing](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT POHAKULOA EIS
Date: Thursday, May 8, 2025 5:19:12 AM

Aloha, this testimony calls on the BLNR to **REJECT** the final EIS for Pohakuloa.

1. Pohakuloa is Hawaiian land.
2. Using Hawaiian land for U.S. Imperialism is desecration.
3. The U.S. army is responsible for immeasurable damage to our land and water with no plans for clean up in sight.
4. Just as in Kaho`olawe and Mākua, the U.S does not NEED Pohakuloa for training. The army simply wishes to use Hawai`i as a base in the pacific, which we do not and never have consented to.
5. The army amidst widespread contamination, but refuses to assess or clean up.
6. The army cannot prove that contamination has not spread into water or ecosystems.
7. The army refuses to share safety procedures or spill data and deletes critical information.
8. Fires, effects to endangered species and climate impacts are dismissed without evidence.
9. The FEIS evades Hawai`i law by ignoring obvious cumulative impacts.

I urge the BLNR to REJECT the final EIS for Pohakuloa and DENY any further lease to the U.S. military.

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Chauncey K P P L Asing
Mauna Kea Forest Restoration Coordinator
PCSU/RCUH
Division Of Forestry and Wildlife
19 E. Kawili Street
Hilo, Hi 96720
Office: 808-974-4228
Cell: 808-960-1801
Fax: 808-974-4226



From: [Daniel Barcenas](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Oppose/Reject
Date: Thursday, May 8, 2025 6:42:58 AM

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,
Daniel Bárcenas
Kapolei, HI
Danielbarcenass58@icloud.com
2542308394

From: [Kepa Barrett](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area
Date: Thursday, May 8, 2025 6:23:49 AM

May 8, 2025

Aloha Chair Chang and Members of the Board,

My name is Kēpa Barrett, and I am a member of Hui Aloha ʻĀina 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.

I am a Kanaka Maoli born & raised on the islands of Hawaiʻi, Maui, and Oʻahu. I am also a Hawaiian Immersion graduate with a degree in Environmental Analysis and a minor in Economics, and I've worked in the environmental conservation sector in Hawaiʻi for over 15 years.

These are not simply "state lands"—they are stolen ʻāina 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 ʻāina.

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,

W. Kepa Barrett

Honolulu, O'ahu

Sustainability & 'Āina-based Learning Manager

From: [Cheryl Boroumand](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 6:43:21 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

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

2. Environmental Irreversibility

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

3. 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,
Cheryl Boroumand
Maui

mum1001@gmail.com

From: [Pomai Brandt](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written Testimony
Date: Thursday, May 8, 2025 7:05:20 AM

Aloha Chairperson and Members of the Hawai‘i Board of Land and Natural Resources:

I write today on behalf of my kūpuna, kānaka ‘ōiwi, and community members deeply committed to the protection of Pōhakuloa Training Area—‘āina that holds sacred cultural sites and critical habitats. We stand in strong opposition to the U.S. Army’s Final Environmental Impact Statement (FEIS) and respectfully urge you to reject any continuation of their lease and live-fire operations on these lands.

Pōhakuloa is far more than an expansive landscape; it is the embodiment of our ‘ike kupuna and the resting place of our ancestors. The Army’s current activities—especially repeated bombing and live-fire exercises—have:

- Burned nearly 20,000 acres of cultural and ecological critical habitat
- Threatened Hawai‘i’s most endangered species through habitat destruction and contamination
- Introduced serious risks of unexploded ordnance, heavy metals, and depleted uranium leaching into ‘āina and wai

This scale of bombing on sacred ground is not only environmentally destructive but also a profound assault on our lāhui’s spiritual and cultural mana. Military training of this magnitude, with its thunderous detonations and scorched earth tactics, cannot coexist with the duty to mālama ‘āina enshrined in our State Constitution.

The FEIS is fatally flawed in that it:

- 1. Fails to provide an adequate Environmental and Cultural Impact Analysis**
- 2. Offers no real plan to mitigate damage to wahi pana and native ecosystems**
- 3. Leaves unresolved concerns about depleted uranium and long-term contamination**
- 4. Contradicts the Conservation District’s mandate to protect natural and cultural resources**
- 5. Undermines BLNR’s constitutional kuleana to mālama ‘āina for present and future generations**

We implore you: do not allow another day of indiscriminate bombing on lands that belong to Hawai‘i’s people. Reject the Army’s FEIS in its entirety and demand the immediate cessation of all live-fire operations. Only then can we embark on a genuine process of healing, restoration, and reconciliation with our sacred ‘āina.

Mahalo nui loa for your thoughtful consideration and steadfast commitment to the land, culture, and future of Hawai‘i.

Me ka ha‘aha‘a,

Pōmaika‘i Brandt
Hilo, Hawai‘i
May 5, 2025

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Ke one holu i Waiolama

Ms. Pōmaika‘i Brandt
Ka ‘Umeke Kā‘eo PCS
1500 Kalanianaʻole Ave.
Hilo, HI 96720
Kelepona *telephone*: [808.961.0470](tel:808.961.0470)
Kelepa‘i *fax*: [808.933.0975](tel:808.933.0975)

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From: [Lorna Brown](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 6:53:32 AM

Reject the U.S. Army's FEIS. It is incomplete.

Lorna Brown
Kailua-Kona

From: [Shantee Brown](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 6:39:02 AM

Please reject the U.S. Army's FEIS due to it being incomplete

Aloha Board members,

My name is Shantee Brown. I was raised in Waikōloa and live in Kailua-Kona. I submitted public comments for the draft EIS and second draft EIS. The Army gives generic, inadequate responses to community concerns in every category. They do not acknowledge our lived experiences or recommendations by local experts. I agree with DLNR staff that the FEIS should include impacts to connected lands such as federally owned lands. We should also have current + independently done testing for depleted uranium, heavy metals, and noise from bombing and aircraft. When jets fly over Kona they fly low 3-5 times and sometimes in the evening. They should not be flying so close to homes. It's very stressful because it sounds like we are being attacked.

Thank you,
Shantee Brown

From: [Meredith Buck](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1, Regarding Pōhakuloa
Date: Thursday, May 8, 2025 2:02:53 AM

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

My name is Meredith Buck and I am a resident of Kailua Kona, Hawaii.

I am writing to urge the BLNR to reject the US Army's Final Environmental Impact Statement for extending its use of the lands at Pōhakuloa Training Area on Hawai'i Island.

There are many reasons this FEIS is insufficient — spanning from the environmental and cultural to the legal and practical. I echo the many testimonies submitted that detail these issues at length.

I believe that this FEIS lacks perspective and trust because it was performed by the party that is attempting to maintain tenure over the lands in question. While this is the method outlined by the law, it leaves too much room for failure in assessment. Considering the history of this project, and the widespread dissent it has engendered across the Pae 'Āina, I'm not convinced the Army's survey team is able to identify and own up to all of the shortcomings in its promise to practice aloha 'āina. If the EIS fully accounted for depleted uranium, critical habitat, iwi kūpuna, the burden on native and local communities, the aquifer system, AND the colonial history of America's militarized presence in Hawai'i, maybe we'd have a starting point. But warfare and healthy habitats & culture don't mix anyway, so the way I see it, there's no way this FEIS can go through.

In that light, I encourage the BLNR to reject the US Army's FEIS for continued occupation of Pōhakuloa.

I appreciate the time you've taken to consider this and many other testimonies on this issue. Thank you for your hard work. I am available for contact by this email address should any questions arise.

Mahalo nui loa,

Meredith Buck
96740

From: [Kaila Eliz. Chang](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 6:36:53 AM

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.

Mahalo for your time and consideration. I hope you will do right by the people of Hawai‘i and the ‘Āina that you are a steward of. If you would like to further discuss this topic feel free to email this email chain or at kchangfreitas@gmail.com.

Me ka ‘oia‘i‘o,
Kaila Elizabeth Chang Freitas
Kanaka Maoli

From: [Jenifer Ching](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony for May 9
Date: Thursday, May 8, 2025 4:57:17 AM

Personal Testimony on the Bombing of Pōhakuloa on the Big Island

As a resident of the Big Island and a steward of our sacred lands, I feel compelled to share my heartfelt testimony regarding the ongoing bombing of Pōhakuloa. This area has long been a site of military training and operations, severely affecting our land, water, and wildlife. The military's presence in Pōhakuloa is not just an issue of land use; it represents a profound disregard for the cultural and ecological integrity of our island.

Detrimental Effects of Bombing at Pōhakuloa

1. Land Degradation:

- Bombing has led to severe soil erosion and compaction. The explosive impacts cause fragmentation of the landscape, disrupting ecosystems and preventing the natural growth of native flora.
- The introduction of heavy machinery and military equipment has left scars in the land, and the continuous activity has resulted in a loss of biodiversity.

2. Water Contamination:

- Runoff from training exercises often contains toxic chemicals, which seep into the groundwater and nearby water bodies, posing a threat to drinking water sources.
- The contamination affects not only the surface water but also aquifers that supply water to local communities and ecosystems.

3. Wildlife Disruption:

- The bombing exercises create noise and physical disturbances, driving away native wildlife and disrupting their habitats. Many endangered species, such as the Hawaiian monk seal and various birds, are particularly vulnerable.
- Fragmentation of their habitats due to military operations leads to reduced breeding success and population declines of native species.

4. Cultural Impact:

- Pōhakuloa is not just land; it is a sacred site for many Native Hawaiians. The bombing desecrates culturally significant landscapes and disrupts traditional practices, including practices tied to land stewardship and resource management.

Timeline of Impact

- Initial Military Occupation (1960s): The U.S. military began extensive training operations at Pōhakuloa, marking the start of major ecological disruption and cultural dislocation.
- Impact Escalation (1970s-1990s): Increased activity and enhanced bombing techniques led to noticeable deterioration in soil quality and native species populations. Reports of wildlife displacement and habitat loss became more frequent.
- Continuous Decline (2000s-Present): Recent studies highlight alarming levels of chemical

contamination in local water sources. The erosion of the land and biodiversity has reached critical levels, necessitating urgent action.

Urgent Demand for Military Withdrawal

The military must no longer be allowed to lease and bomb this sacred land. Immediate action should be taken to cease all military operations in Pōhakuloa.

- Timeline for Equipment Removal: The military could efficiently remove equipment and operations in approximately 6 months, given proper logistical support and planning.
- Estimated Time for Ecological Regeneration: After military withdrawal:
 - Immediate Recovery (1-3 Years): Initial recovery of soil quality and some vegetation may begin quickly, as natural processes take over.
 - Long-Term Recovery (10-30 Years): Full ecological regeneration, including the return of native wildlife and restoration of the landscape, could take decades. Restoration efforts would be essential to support resilience and biodiversity.

Conclusion

We are at a critical juncture. The ongoing desecration of Hawaiian land and resources is not sustainable or justifiable. Pōhakuloa deserves protection and restoration, not bombs and machinery. It is time to stand together to advocate for our land, water, wildlife, and cultural heritage. We must demand an end to military operations and commit to a path of healing and regeneration for future generations.

It's time to take care of our home.

Aloha,
Jenifer Ching

From: [Hannah Coburn](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written testimony in opposition of the army's proposed retention of leased lands at Pōhakuloa
Date: Thursday, May 8, 2025 6:54:33 AM

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 to the proper stewards and begin a real process of healing and restoration.

Sincerely,
Hannah Ka'iulani Coburn
Kalaeloā, O'ahu

From: [Larissa Cordeira](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 6:46:38 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 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.

As a licensed Kanaka Maoli psychologist, I know the impact damage to our 'aina has on the mental health of our people. It's all a cycle. Our relationship to our land is a vital part of our mental health. When we take care of it, the land takes care of us. I urge you to please do what is pono and stop the military use at Pōhakuloa.

Me ka 'oia'i'o,

Larissa Cordeira, Psy.D.
Waipi'o, 'Oahu
Licensed Clinical Psychologist
(808) 492-9006

From: [Jayden Curry](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 12:05:47 AM

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kama'aina 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. We can't have the chance of radioactive debris such as alpha particles, beta particles, and gamma radiation which all are emitted by Depleted Uranium (DU), to seep into our waters and our delicate ecosystems allowing to harm endangered species with also putting public safety at risk. 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.

It is a disgrace that the State of Hawai'i has once again put their own needs in front of the people's needs, personally doing and knowing that our Kanaka Maoli and Kama'aina having to move away from Hawai'i in the results of outrageous cost of living throughout the islands, while this State's Government leased 23,000 acres to U.S. Army for only one dollar is a slap in the face to the people of this land, that was in the 1950s and it's now 2025, we have an opportunity to rewrite a wrong today.

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,
Jayden Curry
Mililani, O'ahu

From: [Kiana Davis](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 6:34:45 AM

Aloha Members of the Board of Land and Natural Resources,

My name is Kiana Mae Davis, and I am writing as a concerned Kanaka Maoli in strong opposition to the acceptance of the Final Environmental Impact Statement for Pōhakuloa Training Area and the renewal of the U.S. Army's lease. And I respectfully urge you to reject the FEIS. 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. The BLNR has a constitutional duty to protect cultural and natural resources for future generations. Critical questions about endangered species, iwi kūpuna, and sacred sites are left unanswered by the FEIS. Approving this EIS would be a failure of that trust—permitting further destruction rather than conservation. Also, by accepting the FEIS you would be continuing to ignore the harm being done to us Native Hawaiians and the 'āina at Pōhakuloa. 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. My ancestors took care and protected the land, so I must do the same. We cannot continue to let the military bomb and desecrate the land. 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. I would also like to add concerns over depleted uranium in the soil. Exposure to depleted uranium is linked to cancer and other negative health impacts. It is our kuleana to mālama 'āina and to take care of each other. The time to act is now. Reject this EIS. Return the land to its rightful caretakers. And let the healing of Pōhakuloa begin. Mahalo for your time.

From: [Theodore Deponte](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject pohakuloa Environmental Impact Statement
Date: Thursday, May 8, 2025 7:08:16 AM

Aloha , I am a born and raised 10th generation local in opposition of the renewal of pohakuloa military contract! They have not fulfilled their Environmental Impact Statement requirement's for renewal of their contract they have violated and desecrated many cultural sites throughout the saddle road area creating a dangerous nuisance to the public playing war games on sacred grounds. Enough is enough we the people of Hawaii Do NOT support pohakuloa's future on our mauna ! Leaving opala and unexploded ordinances on sacred lands should be illegal for any and everyone! Please respect our people ,our culture , and most importantly our aina !!! We don't need them making another "red hill " situation or creating dangerous situations for the public . We also don't need them eradicating animals with helicopters etc!!!! Please stop all the devastation and don't allow renewal without the proper Environmental Impact Statement fully conducted and fully fulfilled along with open access to that EIS for the public to verify compliance and completion of the military's obligations under The EIS requirements.

Sent from my iPhone

From: [Venetta Enos](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject EIS renewal of lease at Pōhakuloa
Date: Thursday, May 8, 2025 6:49:04 AM

Aloha Land Board Members:

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

- . Inadequate Environmental and cultural impact Analysis
- . Lack of sufficient plans to mitigate impacts to cultural and natural resources.
- . Concerns about 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 duties to mālama aina.

This is my testimony to express strong opposition to the U.S. Army's proposed retention of leased lands at Pohakuloa Training Area and to urge the land board to reject the Army EIS.

Sincerely,
Venetta Rhoda Owana Kaohelani Enos
Hilo, Hawaii

Testimony of Hui Aloha 'Āina o Hilo

May 7, 2025

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

Aloha e Chair Chang and Members of the Board,

As a branch of Ka 'Ahahui Hawai'i Aloha 'Āina, more commonly known as "Hui Aloha Aina", and specifically the Hilo branch who represents our membership of Hilo, Puna, Ka'ū, and Hāmākua, we strongly urge the Board of Land and Natural Resources to vote "NO" on accepting the Army's Final Environmental Impact Statement (FEIS) for Pōhakuloa Training Area. We oppose both the retention of any lease at Pōhakuloa and the acceptance of this deeply flawed and deceptive environmental document.

As part of the Hawaiian Kingdom Crown Lands that were administered directly by our ali'i, these lands and waters of Pōhakuloa, and many others like it, were held in trust for the benefit of the Hawaiian people. They were so special to our people, our nation, and our histories that the only person entrusted with its care was the King or Queen. Bound by a constitution, these rulers consistently and relentlessly advocated for the protection of these resources, wahi kūpuna, and wahi pana.

For over 65 years, the Army has bombed, burned, and poisoned Pōhakuloa. The U.S. military is responsible for immeasurable and irreparable environmental damage, yet is taking no accountability, avoiding any clean-up efforts, and anticipating no end in sight. With track records such as Kaho'olawe, Makua, Kapukākāi, and this time Pōhakuloa – it would be foolish to think that the Army or U.S. military would change its practice now, or in the future.

The Army's FEIS is not a document of accountability, but rather a document of evasion and disrespect. It admits widespread contamination at Pōhakuloa, yet the Army refuses to assess the full extent of the damage or propose a clean-up plan. They cannot prove their weapons and toxins haven't contaminated our water or ecosystems—because they haven't looked. They hide safety procedures, withhold spill data, and delete key information from public reports.

We know that there were once healthy forests and cloud belts that straddled the region, yet the Army denies the volatility of its current state, dismissing; fire threats, risks to endangered species, and the worsening effects of climate change—without scientific evidence or serious analysis to back their claims. Worst of all, the FEIS ignores cumulative impacts, as though the destruction of Pōhakuloa exists solely in a vacuum.

While we stand here today, facing the unwelcome and illegal occupation of Hawai'i by the United States, the greatest affront to Hawaiians that can be committed is the continued

desecration and internment of Pōhakuloa by the U.S. military. Dually, the ramifications of allowing such behavior in such a sensitive space reach far beyond Hawai'i's shores. Allowing the U.S. military free access to Hawai'i's soil, without consequence, could only serve to reflect this board's complicity in the spreading of U.S. imperialism and hegemony across the world – as that is the only product and use the military sees for this space. This is the same type of hegemony that saw to it our own illegal occupation, starting in 1893.

Beyond an environmental review or rubber stamp, this is a pacifier being handed to us by an agency that could care less about our safety or our laws. This agreement is only designed to continue the occupation and degradation of Hawaiian lands and waters. Accepting this FEIS would not just be irresponsible—it would be complicity in Pōhakuloa's continued harm.

As the families, communities, residents, and those who will be most affected by your decisions on this matter – and who for 65+ years have fought against the desecration of Pōhakuloa – we ask for you to do right by the land and its people, and the opportunity to do so is now.

We urge you: do not accept this Final EIS. Do not allow the U.S. Army to retain lands at Pōhakuloa. Uphold your duty to protect Hawaiian land. The future of our 'āina and our lāhui depends on it.

"E ho'omau i ke kūpa'a no ke aloha i ka 'āina."
Hui Aloha 'Āina o Hilo

Sarah Nī'au Wakana, Pelekikena (*President*)

Makoa Freitas, Hope Pelekikena (*Vice President*)

Maile Lavea-Malloe, Pu'ukū (*Treasurer*)

Kini Ka'awa, Kākau 'Ōlelo (*Corresponding Secretary*)

StormyLee Swain, Kākau 'Ōlelo Palapala (*Recording Secretary*)

Kealia Prince, Luna Ho'omalū (*Sergeant-at-Arms*)

Testimony of Hui Aloha 'Āina o Hilo

May 7, 2025

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

Aloha e Chair Chang and Members of the Board,

As a branch of Ka 'Ahahui Hawai'i Aloha 'Āina, more commonly known as "Hui Aloha Aina", and specifically the Hilo branch who represents our membership of Hilo, Puna, Ka'ū, and Hāmākua, we strongly urge the Board of Land and Natural Resources to vote "NO" on accepting the Army's Final Environmental Impact Statement (FEIS) for Pōhakuloa Training Area. We oppose both the retention of any lease at Pōhakuloa and the acceptance of this deeply flawed and deceptive environmental document.

As part of the Hawaiian Kingdom Crown Lands that were administered directly by our ali'i, these lands and waters of Pōhakuloa, and many others like it, were held in trust for the benefit of the Hawaiian people. They were so special to our people, our nation, and our histories that the only person entrusted with its care was the King or Queen. Bound by a constitution, these rulers consistently and relentlessly advocated for the protection of these resources, wahi kūpuna, and wahi pana.

For over 65 years, the Army has bombed, burned, and poisoned Pōhakuloa. The U.S. military is responsible for immeasurable and irreparable environmental damage, yet is taking no accountability, avoiding any clean-up efforts, and anticipating no end in sight. With track records such as Kaho'olawe, Makua, Kapukākāi, and this time Pōhakuloa – it would be foolish to think that the Army or U.S. military would change its practice now, or in the future.

The Army's FEIS is not a document of accountability, but rather a document of evasion and disrespect. It admits widespread contamination at Pōhakuloa, yet the Army refuses to assess the full extent of the damage or propose a clean-up plan. They cannot prove their weapons and toxins haven't contaminated our water or ecosystems—because they haven't looked. They hide safety procedures, withhold spill data, and delete key information from public reports.

We know that there were once healthy forests and cloud belts that straddled the region, yet the Army denies the volatility of its current state, dismissing; fire threats, risks to endangered species, and the worsening effects of climate change—without scientific evidence or serious analysis to back their claims. Worst of all, the FEIS ignores cumulative impacts, as though the destruction of Pōhakuloa exists solely in a vacuum.

While we stand here today, facing the unwelcome and illegal occupation of Hawai'i by the United States, the greatest affront to Hawaiians that can be committed is the continued

desecration and internment of Pōhakuloa by the U.S. military. Dually, the ramifications of allowing such behavior in such a sensitive space reach far beyond Hawai'i's shores. Allowing the U.S. military free access to Hawai'i's soil, without consequence, could only serve to reflect this board's complicity in the spreading of U.S. imperialism and hegemony across the world – as that is the only product and use the military sees for this space. This is the same type of hegemony that saw to it our own illegal occupation, starting in 1893.

Beyond an environmental review or rubber stamp, this is a pacifier being handed to us by an agency that could care less about our safety or our laws. This agreement is only designed to continue the occupation and degradation of Hawaiian lands and waters. Accepting this FEIS would not just be irresponsible—it would be complicity in Pōhakuloa's continued harm.

As the families, communities, residents, and those who will be most affected by your decisions on this matter – and who for 65+ years have fought against the desecration of Pōhakuloa – we ask for you to do right by the land and its people, and the opportunity to do so is now.

We urge you: do not accept this Final EIS. Do not allow the U.S. Army to retain lands at Pōhakuloa. Uphold your duty to protect Hawaiian land. The future of our 'āina and our lāhui depends on it.

"E ho'omau i ke kūpa'a no ke aloha i ka 'āina."
Hui Aloha 'Āina o Hilo

Niau Wakana, Pelekikena (*President*)
Makoa Freitas, Hope Pelekikena (*Vice President*)
Maile Lavea-Malloe, Pu'ukū (*Treasurer*)
Kini Ka'awa, Kākau 'Ōlelo (*Corresponding Secretary*)
StormyLee Swain, Kākau 'Ōlelo Palapala (*Recording Secretary*)
Kealia Prince, Luna Ho'omalū (*Sergeant-at-Arms*)

From: [Raul Nohea Goodness](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1 : Reject the FEIS for Pohakuloa Training Area
Date: Thursday, May 8, 2025 6:35:27 AM

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

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

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

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

Mahalo for your work and time on this matter,

Sincerely,
Raul Nohea Goodness
Wailuku, Maui

From: [Sharon Gottfried](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Thursday, May 8, 2025 6:14:29 AM

Aloha kākou,

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's activities on this land are not consistent with proper stewardship, 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. There is NO land in the State of Hawaii or adjacent waters that should be used in this manner.

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.

Sincerely,
Sharon D Gottfried
Wainiha, Kaua'i

From: [Katherine Hachmeister](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 5:03:44 AM

Aloha e Chair Chang and Members of the Board of Land and Natural Resources, My name is Katherine Hachmeister and I am from Honolulu. I respectfully urge you to do the right thing, and REJECT the clearly insufficient FEIS in Item D-1. As the DLNR staff submittal makes clear, the FEIS fails to include needed biological and archaeological surveys, turns a blind eye to environmental impacts on federal lands, and downplays obviously significant threats to endangered native birds and wildlife - among many other issues. Accepting this dangerously deficient document may accordingly result in actions that threaten the permanent and inadvertent loss of native species, iwi kūpuna, and historic properties, among other deep and immeasurable harms to the public interest. Accordingly, please REJECT the FEIS put forward in Agenda Item D-1. Mahalo nui for the opportunity to testify. Sincerely,

Katherine Hachmeister

From: [K.H](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Thursday, May 8, 2025 6:07:26 AM

Land Board Members:

As a nature educator, 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.

Most sincerely,

Kimberly Harvell

From: [Christina Henline](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa opposition
Date: Thursday, May 8, 2025 12:03:28 AM

Aloha,

My name is Christina Henline and I do not support the military using Pohakuloa as a training center. I grew up in Hilo and am proud to be a native Hawaiian who will continue to try my best to protect our native land from destruction. It is way too valuable and we must protect our 'aina! Pohakuloa is Hawaiian land and should be returned to its rightful owners.

I can feel it in my bones that the US military has already caused enough damage to the land and water in the area of and surrounding Pohakuloa as they have done with Kahoolawe and many other "training areas" across the Hawaiian islands, and they do little to nothing to repair or compensate for the damage they have caused.

I reject the army's final EIS.

Mahalo nui for taking the time to read my testimony.

Sincerely,
Christina K. Henline



www.fishflags.com
(808) 936-1909

From: [Heather Hewahewa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Thursday, May 8, 2025 4:08:57 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 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 ka 'ōia'i'o,
Heather Hewahewa
Keaau, Hawai'i
hfwahewahewa@comcast.net

From: [Chauncey HH](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Submitted Written Testimony — Agenda Item D1: REJECT the US Army EIS of the Pōhakuloa Training Area
Date: Thursday, May 8, 2025 7:07:06 AM

aloha kākou;

to whom it may concern,

I am submitting this testimony to record my immense opposition to accepting the US Army's EIS of the Pōhakuloa Training Area. **Reject the Us Army EIS of Pōhakuloa Train Area.** Concurrently, I strongly oppose any further leasing of these lands to the US Army.

By head, heart, and hand;
with seed, soil, and stone;
you must be enlightened, determined, and resolute to this land.

Take your heart in your throat, the sweat on your palms, and stand up to this institution.

Mahalo,
Chauncey Hirose-Hulbert

From: [Gary Hooser](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [Gary Hooser](#); [Gary Hooser](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1 - Please confirm receipt
Date: Thursday, May 8, 2025 4:45:42 AM

To: Board of Land and Natural Resources

RE: Testimony for Agenda Item D-1, scheduled for May 9th 2025

From: Former Hawai'i OEQC Director, Gary Hooser

Aloha Land Board Members

I am writing to urge you to reject the Army's FEIS relating to the proposed retention of leased lands at Pōhakuloa Training Area.

According to the EIS: "Because the Army's Proposed Action involves retention of State-owned land, this EIS also must fulfill the Hawai'i EIS statute and implementing rule, codified in Hawai'i Revised Statutes (HRS) Chapter 343..."

As the former Director of the Hawai'i Office of Environmental Quality Control (2011 - 2012), my job was to manage the administration of HRS Chapter 343, and to educate State agencies on its key elements.

I am keenly aware of the requirements of HRS Chapter 343, Hawai'i's EIS statute and am testifying without reservation whatsoever, that the Army's FEIS and related documentation are totally inadequate.

The Department of Land and Natural Resources own staff report states,

"Throughout the EIS process, Staff had and continues to have concerns with the following;

1. That the contents of the draft/final EIS do not fully declare the environmental implications of the proposed action and does not discuss all reasonably foreseeable consequences, and
2. The data and analysis do not commensurate with the importance of the impacts. "

The FEIS analysis of "direct impacts" falls far short of a complete analysis and I encourage Land Board Members to closely review the comments provided by the Sierra Club of Hawai'i and other environmental stewards who have closely examined the EIS and submitted testimony.

The lack of a complete and proper analysis of the "direct impacts" is by itself sufficient reason to reject the FEIS.

Another huge concern is the almost non-existent review, documentation, and/or research on "indirect, secondary, and cumulative impacts" that are absolutely required for any HRS Chapter 343 compliant FEIS.

For example there is minimal discussion on the type of "ordinance" that will be deployed such

as - explosive size and types, uranium tipped, chemical weapons, laser and or magnetic cannons now under development - and others.

What are the anticipated direct and long term impacts from the various weapons systems? How will the “residue” from the use of these weapons be “cleaned up”? Where will the “clean-up” materials (possibly toxic) be deposited? What materials will go into landfills located in Hawai‘i County? What materials will be shipped outside of Hawai‘i, and to where?

All weapons listed must be transported to and from the subject area. What are potential impacts of incidents that may occur at the harbor, airport, or along the highways during such transportation?

The entities listed as possible users and beneficiaries of the Pōhakuloa Training Area include foreign and “multinational” entities. What are the secondary impacts of training foreign or multinational armies on Hawai‘i soil? Will the adversaries of these foreign countries consider Hawai‘i now their adversary because of our support and assistance to their enemies?

These questions and more, must be asked and examined as legitimate “secondary and indirect” impacts.

The U.S. Army’s FEIS for Pōhakuloa is woefully inadequate and I strongly urge the State Board of Land and Natural Resources to reject it.

Gary Hooser
Former OEQC Director
Former Hawai‘i State Senator
Ohelo Road, Kapaa, Hawai‘i
808-652-4279

From: [kelii ioane](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Thursday, May 8, 2025 6:52:37 AM

My name is Kelii W. Ioane Jr. I am here to testify against the profane desecration that the United States Army has been engaged in with the bombing of Pohakuloa. No more bombs in Hawaii. Go bomb Russia.

[Sent from Yahoo Mail for iPad](#)

From: [Kayla James](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony - May 2025
Date: Thursday, May 8, 2025 5:14:24 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned 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.

Me ka 'ōia'i'o,
Kayla James
Kapolei, Oahu
808-203-8420

From: [astroguy05](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT THE EIS FOR PTA NOW
Date: Thursday, May 8, 2025 6:46:34 AM

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

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

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

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

Mahalo nui for the opportunity to testify.

Sincerely,

Jody

From: [Kaua Kama](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Army's EIS and Lease Renewal for Pōhakuloa, Hawai'i Island
Date: Thursday, May 8, 2025 6:42:20 AM

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

I am writing to respectfully urge the Board to reject the U.S. Army's Environmental Impact Statement (EIS) and deny the lease renewal for the Pōhakuloa Training Area (PTA) on Hawai'i Island.

Pōhakuloa is not simply a military training zone; it is a sacred and storied landscape — an 'āina kapu — situated between Mauna Kea and Mauna Loa, two of the most revered wahi pana (storied and sacred places) in all of Polynesia. According to oral traditions and recorded mo'olelo, this area is part of the piko (center) of the Hawaiian Islands and a vital component of the high-altitude wao akua — the realm of the gods.

The late scholar Mary Kawena Pukui identified this region as a place of spiritual transition, where souls would journey in the afterlife. Furthermore, multiple kūpuna and cultural practitioners have affirmed Pōhakuloa's significance as a place used for traditional practices, offerings, and ceremonial access between Mauna Kea and Mauna Loa (see testimonies from the 2014 EIS scoping meetings and legal filings in Ching v. Case).

In 2019, the Hawai'i Intermediate Court of Appeals affirmed in Ching v. Case that the State has a constitutional duty under Article XI, Section 1 of the Hawai'i State Constitution to protect and preserve public trust resources. The ongoing and proposed military use of Pōhakuloa violates this duty, especially given the continued lack of environmental remediation, the presence of unexploded ordnance, and the ongoing desecration of cultural sites identified in previous archaeological surveys.

The Army's EIS fails to meet its obligation to engage in genuine, informed consultation with cultural practitioners and to present a meaningful plan for long-term stewardship of these lands. Instead, it continues a legacy of harm under the guise of national security — while marginalizing the voices of Native Hawaiians, scientists, and community members who have long sounded the alarm.

I respectfully urge the BLNR to uphold its trust responsibilities and stand in pono by rejecting the Army's EIS and denying the lease extension. It is time to return Pōhakuloa to the people of Hawai'i for proper healing, restoration, and cultural stewardship.

Mahalo for your time and consideration.

Me ka ha'aha'a,

E. Kaulilinoe Kama

From: [Emily Kawamoto](#)
To: [DLNR.BLNR.Testimony](#)
Date: Thursday, May 8, 2025 6:47:31 AM

Sent from my iPhone Aloha, my name is Leimamo Kawamoto. 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,
Leimamo Kawamoto

From: [Kaehukai Keala](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony - urge the land board to reject the Army's EIS
Date: Thursday, May 8, 2025 6:50:56 AM

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,

Kaehukaihaamainae Keala

Oahu Island

From: [Kekoa Kealoha](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: Reject the Army's EIS for Continued Use of Pōhakuloa
Date: Thursday, May 8, 2025 12:27:05 AM

Aloha,

My Name is Kekoaopololū Kealoha and I am writing to strongly urge the Board of Land and Natural Resources (BLNR) to reject the Army's EIS submitted for continued use of Pōhakuloa Training Area (PTA) for the purposes of Live Fire practice.

As a Native Hawaiian, I have serious concerns about the Army's ability to properly steward this land and this latest EIS is an excellent example of the Army's tendency to omit important findings. All branches of the military have done incredible disservices to our people and our land through continued destruction of our natural and cultural resources.

Frequently, we hear of the Army's plea to allow continued use of Hawaiian lands for the purpose of live fire training, but I don't find these pleas to be particularly persuasive because they never address WHY they need OUR 'āina to do it, they never provide a realistic plan for HOW to accomplish this, and they have never fulfilled their commitment to clean up after themselves. It is unjust and irresponsible to allow the Army or any military branch's continued use of Hawaiian land.

The State of Hawai'i has a duty to protect Hawaiians and our pilina to 'āina. The state cannot fulfill this duty if it accepts the Army's EIS.

Mahalo for your time and consideration.

Kekoaopololū Kealoha
(808) 464-5803

From: [Hokuokalani Keliikuli](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Urging Rejection of Army's FEIS for Pōhakuloa
Date: Thursday, May 8, 2025 5:39:32 AM

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 respectfully urge the Land Board to reject the Army's Final Environmental Impact Statement (FEIS).

Pōhakuloa is not merely a tract 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. For decades, the Army has failed to demonstrate the care and stewardship this land requires, and the FEIS falls far short of addressing the significant cultural, environmental, and legal concerns at stake.

The Army's track record speaks for itself: nearly 20,000 acres—much of it designated critical habitat—have already been damaged or destroyed by military-caused fires. This level of harm is unacceptable. The continued use of live-fire training and bombing further threatens the land, water, and all who depend on them. The long-term environmental consequences, including contamination and irreversible degradation, remain deeply concerning and largely unaddressed.

Simply put, military activities on this scale are fundamentally incompatible with the values of conservation, cultural integrity, and *aloha 'āina*.

The FEIS should be rejected for the following reasons:

- **Inadequate analysis** of environmental and cultural impacts
- **No meaningful plan** to mitigate harm to cultural and natural resources
- **Ongoing concerns** about depleted uranium and other contaminants remain unresolved
- **Inconsistency** with the area's conservation district designation
- **Violation** of the BLNR's constitutional duty to *mālama 'āina*

I urge you to honor the land, uphold your kuleana, and stand with the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. It is time to return these lands and begin a genuine process of healing, restoration, and accountability.

Mahalo for your consideration,

S. Hōkūokalani Keliikuli
Kumu papa 2, Ka 'Umeke Kā'eo PCS
113 Kuawa St.
Hilo, 96720

received this transmission in error please notify the sender immediately by e-mail or contact Ka 'Umeke Kā'eo at its@kaumeke.net and then delete this message from your system.

From: [Lizzy Laliberty](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT the final EIS for PTA
Date: Thursday, May 8, 2025 1:13:41 AM

Aloha BLNR,

Here's why you have an obligation to reject the EIS for PTA:

- DU
- endangered species "takes" (what a sick word)
- FIRES! a lot of them! 800+
- Live fire training and bombing 24/7 causing desecration of air, land and water
- Disrespect for culture, land, resources
- Lies! how can this entity be trusted?!
- NO benefit to people of Hawaii island.
- Majority of people want Army gone from PTA. Does that matter?
- EIS are a political tool and not meant to actually mitigate harms.

We are asking you to do your jobs by upholding the mission of your agency. Protect the lands, water and air for the people of Hawaii.

Sincerely,
Liz Laliberte
Hilo, HI

From: [Gabrielle Langkilde](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 1:08:02 AM

Aloha Chair Chang and Members of the Board,

My name is Gabrielle Langkilde, and I am the executive editor of Pasefika Presence Magazine. On behalf of my organization, 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.

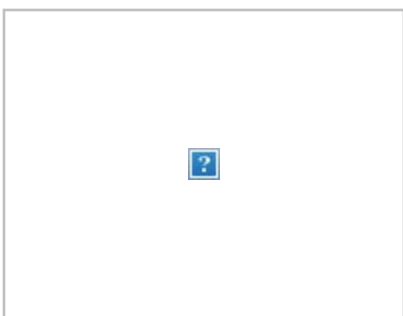
Me ka 'oia'i'o,

Gabby Langkilde
Honolulu, Oahu

Executive Editor

Email: glangkilde@pasefikapresence.org

[LinkedIn](#)



... a magazine for the voices of the Pacific

pasefikapresence.org



From: [Leona Leialoha](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Thursday, May 8, 2025 2:37:38 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 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,
Leona Leialoha
Keaukaha, Hawai'i island
[Kanaka Maoli

From: [Ekini Lindsey](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Thursday, May 8, 2025 6:00:40 AM

Aloha, my name is Ekini Lindsey, and

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. Below are my strong views in opposition!!

Waiemi, Hanaipo'e, Waiaua, Pu'u Hoku'ula, Pu'u Holoholo Kū, Kalai'eha, Pu'u Ke'e Ke'e.

I respectfully invoke these names, which signify ahupua'a(land division) and pu'u (hill sites) surrounding Mauna A Wakea and Pōhakuloa. Equally important, I call forth the names of my ancestors- Thomas John Weston Lindsey, William Miller Seymour Lindsey, George Miller Seymour Lindsey, and George Mahalopiha Lindsey, my forefathers whom traversed these sacred lands while employed by John Palmer Parker from 1847 to the 1960's. In addition, in 1881 ascent of Mauna A Wakea by Queen Emma and her entourage, William Seymour Lindsey, accompanied the Queen due to his knowledge of the mountain and witnessed the "ceremonial cleansing" at Lake Waiau, highlighting the interconnectedness of sacred sites from mountain to sea. These are the mo'olelo or stories that are documented and were shared to me by my kūpuna. From pristine land to destruction,

the military's perceived arrogance over the years, protesting for their future while claiming to care about cultural sites, land stewardship, and indigenous matters, is perplexing. How can they simultaneously express concern for the land and engage in destructive activities like bombing and desecration, seemingly without logical explanation. Enough is Enough!!!

We urge the Military to vacate our islands immediately!!! The devastating impact of their presence has been WAR based and destruction from the world, which contradicts the values of aloha āina that we, as islanders, hold dear. We are against WAR, against BOMBS, against Military actions that KILL and destroy people. With their presence here, it's like we, Kānaka are condoning such behavior.

Fortunately, my Kūpuna, whom I previously mentioned, did not live to witness such tragedy; however, as a Waimea Kānaka and considering the impact on future generations, we experience this torture daily.

The onus is on you, BLNR, tainted by the blood of thousands who lost their lives across the globe, trained at the Pohakuloa Training Area (PTA). Auē!!!

Ka Ahahui Hawaii Aloha Aina (Hui Aloha Aina)

May 7, 2025

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

Aloha Chair Chang and Members of the Board,

Ka Ahahui Hawaii Aloha Aina, more commonly known as “Hui Aloha Aina” is made up of branches across Ko Hawai‘i Pae ‘Āina. We strongly urge the Board of Land and Natural Resources to vote “NO” on accepting the Army’s Final Environmental Impact Statement (FEIS) for Pōhakuloa Training Area. We oppose both the retention of any lease at Pōhakuloa and the acceptance of this deeply flawed and deceptive environmental document.

Pōhakuloa is not just land—it is Hawaiian Crown lands and is therefore to be used for the benefit of the Hawaiian people. It is ‘āina kapu, sacred land, and part of the national territory of the Hawaiian Kingdom, illegally occupied by the United States. To allow the U.S. military to continue occupying and desecrating this ‘āina is an act of betrayal—not only of Native Hawaiians, but of this entire land’s rightful future.

For over 65 years, the Army has bombed, burned, and poisoned Pōhakuloa. The U.S. military is responsible for immeasurable environmental damage, with no accountability, no clean-up, and no end in sight. The 2019 Hawai‘i State Supreme Court ruling on Ching v Case found that the State of Hawai‘i failed to uphold its constitutional duty to “mālama ‘āina”, to protect this trust land and failed to hold the Army accountable. This is the consequence of giving the U.S. military free rein over our ‘āina. It cannot be repeated.

Just like Kaho‘olawe and Mākua, the Army does not need Pōhakuloa. Global military strategy is moving away from ground invasions. The only reason the Army wants Pōhakuloa is to continue using Hawai‘i as a launchpad for U.S. imperialism across the Pacific—without our consent, and at the cost of our ‘āina and our people.

The Army’s FEIS is not a document of accountability—it is a document of evasion and disrespect. It admits widespread contamination at Pōhakuloa, yet the Army refuses to assess the full extent of the damage or propose a clean-up plan. They cannot prove their weapons and toxins haven’t contaminated our water or ecosystems—because they haven’t looked. They hide safety procedures, withhold spill data, and delete key information from public reports.

The Army dismisses fire threats, endangered species risks, and the worsening effects of climate change—without scientific evidence or serious analysis. Worst of all, the FEIS evades Hawai‘i law by ignoring cumulative impacts, as though the destruction of Pōhakuloa exists in a vacuum.

This is not an honest environmental review—it is a rubber stamp designed to continue the occupation and degradation of Hawaiian land and water. Accepting this FEIS would not just be irresponsible—it would be complicity in continued harm.

We urge you: do not accept this Final EIS. Do not allow the U.S. Army to retain lands at Pōhakuloa. Uphold your duty to protect Hawaiian land. The future of our ‘āina and our lāhui depends on it.

Pa‘a ka Lamakū o ke Aloha ‘Āina,
Ka Ahahui Hawaii Aloha Aina, Central Body

K. ‘Ilima Long, Honolulu
Corey Asano, Honolulu
Makoa Freitas, Hilo
Alaka‘i Kapanui, Hilo
Maile Lavea-Malloe, Hilo
Puaokamele Dizon, Lahaina
Ke‘eaumoku Kapu, Lahaina
U‘ilani Kapu, Lahaina
Niau Wakana, Hilo
Nani Rogers, Kaua‘i

From: [Téa Loren](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 12:02:46 AM

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

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

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

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

Mahalo nui for the opportunity to testify.

Sincerely,
Daphné Loren

From: [Kalani Low](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa bombing
Date: Thursday, May 8, 2025 5:24:58 AM

It's time that the u.s. military stop using Hawaii as it's dump site. They just dump gas into our water, they bombed Kahoolawe to the point where no one can use it. Pohakuloa EIS isnt really line up with Malama 'āina now does it? When is it enough? It's time that we start REFUSING the u.s. army any more land leases due to the misuse of the land and how they have broken public trust for "mission readiness". Meanwhile, more Hawaiians are leaving Hawaii and foreigners coming into Hawaii. When can Hawaii be for the Kanaka again? I strongly oppose the u.s. using Pohakuloa as a waste site where they bomb Pohakuloa and refuse to clean up their mess

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

Date: 5/8/25

Aloha Chair Chang and Members of the Board,

My name is Maluhia Low and I am a Kānaka ʻŌiwi advocate for the protection of our lands and resources, 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 ʻāina 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 ʻāina.

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 Pōhaku'loa, for Hawai'i, and for future generations.

Mahalo for your time and consideration.

Me ka 'oia'i'o,

Maluhia Low
Maui

From: [Jennifer Lum](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa's FEIS
Date: Thursday, May 8, 2025 4:28:16 AM

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

My name is Jen Lum and I am from 'Ewa Beach. 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,

Jen Lum, 'Ewa Beach

From: [Charla Manuel](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] A"ole Pōhakuloa
Date: Thursday, May 8, 2025 12:41:10 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 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,
Charla Napuaonalani Manuel
Moku O Keawe
Kanakanā Maoli
16-2082 Pikake Drive
Pahoa, HI 96778

Charla Manuel
(808) 936-1855

From: [Mahina](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Rejecting the Final EIS for U.S. Military Use of Pōhakuloa
Date: Thursday, May 8, 2025 5:42:45 AM

Aloha e Chair Chang and Esteemed Committee Members,

As a kanaka 'ōiwi and lineal descendant of the Big Island of Hawai'i, I urge you to reject the Final Environmental Impact Statement (EIS) submitted by the U.S. military in support of continued use of the Pōhakuloa Training Area.

Pōhakuloa is a place of deep cultural and spiritual significance to kanaka 'ōiwi and houses ancient trails, heiau, and iwi kūpuna. The military has failed in the past and in this report to assess the historical significance and artifacts at Pōhakuloa. Additionally, military activity has repeatedly bombed and bulldozed these sacred spaces — violating the terms of the lease and the duty to mālama 'āina. And this is not only a legal violation — it causes deep mental and spiritual pain to our community to see the bodies of Native Hawaiians desecrated in this manner.

Additionally, the EIS greatly understates the environmental damage caused by historical and continual military activity. Pōhakuloa is home to endangered plants and animals and the use of live ammunition, nuclear weapons, chemical contaminants, and heavy artillery has poisoned soil and disrupted the fragile ecosystems. No mitigation plan within the EIS adequately restores what has already been lost. 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.

Please stand on the side of justice and reject this EIS. Please protect Pōhakuloa from further desecration.

Mahalo nui,

— Mahina Martinson
New York City, NY / Waimea, HI

From: [Shannon Matson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in Opposition to Agenda Item D-1
Date: Thursday, May 8, 2025 6:28:02 AM

Aloha Chair Chang and Members of the Board,

As a resident of this ‘āina my entire life, as a parent of two keiki born and raised here, as someone who enjoys breathing clean air and drinking clean water, I am **strongly urging 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 and potentially already have seeped 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 mission of the BLNR 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 air, our health, and our cultural identity.

Mahalo,

Shannon Matson

Hawai‘i Island Resident

Sent from my iPhone

From: [H. Doug Matsuoka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Win Win for Hawaii and US Army: Rejecting the Army's EIS and returning Pohakuloa to Hawaii
Date: Thursday, May 8, 2025 12:47:10 AM

Testimony for hearing 5/9/2025 re US Army EIS

I am a 72 year old life-long resident of Hawaii. I testify for the rejection of the US Army's EIS and the return of Pohakuloa to Hawaii after the Army rehabilitates the land/aina. This may seem to be an impossible task given the level of contamination by exploded and unexploded ordinance, toxic contamination of soil and water, including by radioactive depleted uranium. In addition to the physical devastation to the area, the destruction of historical sites of cultural significance was not even mentioned in the EIS. It seems impossible to reclaim and rehabilitate from this level of degradation, but that is precisely the point.

This sort of devastation of land is widespread in times of war and the wars currently in process will require post-war rehabilitation. I do not need to mention the current zones of conflict where billions of dollars and hundreds of thousands of tons of explosives are being deployed.

All these war zones will need post-war Reclamation & Rehabilitation (hereinafter R&R). I do not believe this level of R&R currently exists. The R&R of Pohakuloa will require the development of new technologies that can be funded by the expanded 1 trillion-dollar defense budget being requested by the president. There is little doubt that these technologies can be developed by the same contractors who currently develop weapon systems, and by the same RFP process. Weapons of war are immune from requiring any kind of Return on Investment (ROI) other than efficacy in the national interests.

Once developed, these new technologies will be in high demand throughout the world, and will be able to participate in the R&R of all the places so wracked by war at this very moment. The ability to R&R war-torn land quickly to an historically unprecedented level will change the nature of foreign policy and warfare altogether. But that is a subject for another time and place.

Sincerely,

H. Doug Matsuoka
hdougtestimony@gmail.com

From: [Rebecca Mattos](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 7:05:38 AM

Aloha e Chair Chang and Members of the Board of Land and Natural Resources, My name is Rebecca Mattos and I am an educator with Sustainable Coastlines Hawai'i. I respectfully urge you to do the right thing, and REJECT the clearly insufficient FEIS in Item D-1.

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

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

Mahalo nui for the opportunity to testify.

Sincerely,

Rebecca Mattos

From: [Noelani Mengel](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1, EIS Pohakuloa
Date: Thursday, May 8, 2025 4:56:49 AM

Aloha,

My name is Noelani Mengel, I am a second generation Native Hawaiian residing in California.

I reject the Army's EIS for Pohakuloa. Pohakuloa is a critical habitat that is home to endangered and endemic animals and plants.

The military has not been transparent with the community in regards to our ancestors and their bones, why are they moving them, what protocol was done to ensure their safety and respect. No more bombing, no more occupation.

mahalo
Noelani

Aloha e Board Members,

I am writing to strongly OPPOSE agenda item D.1. I am urging you to vote AGAINST the acceptance of this highly incomplete FEIS before the 30 day deadline to do so passes.

The FEIS submitted by the US Army on April 18th does not fulfill the required responsibilities of their tenancy agreement. There is insufficient and outdated information on the impacts of these military training activities on vulnerable and protected native wildlife, burial sites, archaeological cultural artifacts, and our water supply. The army has failed to clean up any of the toxic and dangerous munitions waste left behind by their “exercises” from the past 60 years and completely failed to mālama ‘āina as they have been ordered by the determinations of the Ching vs. Case case.

The US military has no business bombing protected lands its own authority has allocated for conservation in the first place. There is nothing environmentally safe or sustainable about detonating explosives that leave behind toxic debris and extremely dangerous unexploded ordnance from failed “tests,” creating toxic runoff containing severe public health and safety hazards such as lead, depleted uranium, and white phosphorus right above the central aquifer of Hawai‘i. It is completely irresponsible and a spit in the face to all the people of Hawai‘i to expect our complacency as the central water aquifer is potentially compromised in this way, most especially to Kānaka Maoli whose ancestral grave sites are also being desecrated, cultural inheritance and material history being stolen and/or destroyed, and land-based cultural lifeways are being jeopardized by this reckless and incompetent oversight. This violation creates psychological, emotional, and spiritual trauma for Kānaka Maoli who are the rightful stewards and protectors of this land, and universally endangers any and all people that live here. Additionally, the US military has been awarded an overly generous rental agreement of \$1 for its 65 year lease which has never been paid off to the public’s knowledge. Again, this reckless and incompetent management severely fails to meet its bare minimum obligations to these lands entrusted to its care.

Ultimately, these facts are all reflective of the fact that the US military has no business bombing Crown and Government lands seized from the Hawaiian Kingdom through fraudulent annexation and illegal occupation of a sovereign and internationally recognized nation. The colonial occupiers will never fulfill the terms of their agreements because their interests are profiteering off mass death and destruction through imperial conquest worldwide to finance the greed and affluence of the ultra-wealthy 1%. The people of the global majority demand enough already! We demand peace, accountability, and clean air, water, and soil for all the children of every generation to come! The people of Hawai‘i do not consent to the desecration of sacred lands in order to field test weapons later to be used on the children of our relatives overseas! Demilitarize Hawai‘i and free Oceania! Return to the land to its lineal descendants, those properly equipped to recognize, steward, and sustain the true waiwai (wealth). We demand leadership and oversight of our natural resources that serve the public’s wellbeing first and center our community’s sustainability and resilience in the face of climate change. The US

military has proved that they are unfit to handle this kuleana (responsibility) time and time again, from Kaho'olawe to Red Hill.

Please strongly reject this woefully insufficient FEIS and hold the US military accountable to its crimes and responsibilities. Cast your vote in favor of the rights of the people, the land, the ancestors of the land and the future children of the land by VOTING NO on agenda item D.1.

From: [Kanani Miyamoto](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Renewal of the Military Lease at Pōhakuloa
Date: Thursday, May 8, 2025 6:43:32 AM

n

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

My name is Kanani Miyamoto, and I am writing in strong opposition to the renewal of the U.S. military lease of lands at Pōhakuloa Training Area (PTA) on Hawai‘i Island. As a Kanaka Maoli concerned community member and artistic and community worker, I am deeply disturbed by the continued occupation and desecration of sacred lands by military operations.

Pōhakuloa is not just a remote training ground but a sacred and ecologically significant wahi pana (storied place). For generations, Native Hawaiians have known this area as a vital part of our spiritual and cultural landscape. It is home to endangered species, fragile ecosystems, and countless sites of cultural and historical significance. Yet for over 65 years, the U.S. military has bombed, polluted, and desecrated this ‘āina.

This is not theoretical — we have evidence of contamination by depleted uranium, unexploded ordnance, and the ongoing destruction of land that should be protected, not militarized. The Department of Land and Natural Resources (DLNR) has a constitutional mandate under the Public Trust Doctrine to protect Hawai‘i’s natural and cultural resources for current and future generations. Renewing this lease would be a violation of that duty.

Additionally, the military has not demonstrated adequate care, stewardship, or respect for these lands. Promises of remediation, cultural sensitivity, or community benefit have consistently been broken. The people of Hawai‘i deserve better than vague assurances and more of the same destruction.

I urge you to listen to the voices of Kānaka Maoli, cultural practitioners, scientists, environmental advocates, and the wider community who call for demilitarization and proper stewardship of our sacred places. It is time to return Pōhakuloa to the people and the ‘āina. Let healing begin by saying **no** to this lease renewal.

Mahalo for your time and consideration.

Respectfully,

Kanani Miyamoto

From: [Cindy Montgomery](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony
Date: Thursday, May 8, 2025 6:05:55 AM

To Whom it May Concern:

My name is Cindy Montgomery. As a resident of the Hawai'i 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,
Cindy Montgomery
66-1741 Akulani St.
Kamuela, HI

From: [Leila Morrison](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 6:11:15 AM

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

My name is Leila Morrison and I am from Waimea on the Island of Hawai'i. 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,

Leila Morrison

From: [K Moses](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] end military lease
Date: Thursday, May 8, 2025 3:40:24 AM

they have proven they are not a good partner.

their track record is denegration.

they have failed to act in life affirming ways.

i say NO to lease renewal.

definitely NO.

From: [Karen Murray](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to the Army FEIS, Agenda Item D-1
Date: Thursday, May 8, 2025 2:04:33 AM

To: BLNR,

My name is Karen Murray. I am writing in opposition to accepting the Army's Final Environmental Impact Statement for Pohakuloa. As EIS's are often inadequate and a general ruse to check off a box on a list of requirements, this is an insincere effort at best.

Military live fire training, especially in Hawaii, is outdated and out of touch with the social fabric being formed across borders online. In addition, our small islands took a long time to form. The live-fire training, even without depleted uranium, eat up and pollute our precious living space; land, water and air.

We are living in "smart" times with no WISDOM. We are stuck with the systemic mindset of overconsumption and have not caught up with the wisdom of our ancestors. Our ancestors lived within their means, in the world filled with respect for the 'aina and other beings in life relationships.

The US military has a poor track record for responsible stewardship as demonstrated with the Red Hill Fuel Tanks and by the many hours, years, it stole from the lives of our people to hold them responsible.

Please reject the Final Environmental Impact Statement in Agenda Item D-1.

Thank you,

Karen Murray

From: [Jordan Nakamura](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Army EIS re: Pohakuloa
Date: Thursday, May 8, 2025 12:10:04 AM

Aloha e Board of Land and Natural Resources,

I am strongly advocating that the BLNR reject the Army's final EIS. The proposed retention of Pohakuloa, given the demonstrably abysmal track record of the environmental damages and mismanagement that the land, air, and water have suffered and are under imminent threat to sustain in the near future under the tenure of the military cannot be ignored. As a lifelong kama'aina, and a mahi ai farm worker with a background in conservation education, I strongly advise that the Board reject this document which severely downplays the significant and adverse impacts of the Army's use of Pohakuloa.

The army has had a longstanding history of contaminating land and refusing to remediate the damage. Some of said damages have proven to be incredibly complex to begin to reverse, such as the Kapukaki fuel and fire-retardant spills that remain banked somewhere in the rock over Oahu's largest aquifer. In regards to Pohakuloa, the latest EIS fails to prove that contamination from extensive and ongoing weapons testing and chemical storage and handling have not spread into vital water sources and other ecosystems.

We know that the navy and army have created what has become a reliable pattern of omitting or refusing to clearly provide safety information, reports, health and safety procedures and spill or damage data, statuses of iwi kupuna sites and other culturally significant sites, the status of endangered species on military property, and the health and environmental impact of its activities on people who are immediately connected to the affected ecosystems.

Furthermore, the military has solidified a disturbing habit of deleting important information which is the public's right to access and be educated on adequately.

The specific threat of fires stemming from the environmental changes taking place as a result of the army's land tenure as well as activities which easily and frequently ignite wildfires has not been adequately assessed or reported. The obvious detriment and escalating threat to vulnerable species and ecological functions are dismissed, lacking evidence to reinforce the army's unique stance of detached and indifferent confidence in their statement of low to irrelevant impact. Furthermore, the duty of remediating the fires increasingly is falling on to local fire prevention staff either very tangential or unrelated to the military, who nonetheless need to make up for the army's lack of fire prevention concern or infrastructure.

The numerous cumulative impacts that extend beyond the incredibly narrow timeframe outlined in the EIS cannot be allowed to be deemed acceptable assessment.

The BLNR has an obligation to the people of Hawai'i to do the right thing in calling this document out for what it is: the latest misleading attempt to characterize the army as a suitable steward of Pohakuloa, when the reality is they have been the clear abusers and polluters of this land to a degree that will become exponentially detrimental the longer this land remains under their control and jurisdiction. The omissions, distortions of accurate impact studies, and severe downplaying of adverse environmental impacts make the final EIS unacceptable. Please uphold the values of the people of Hawai'i as well as the mission of the BLNR, and reject this latest EIS proposed by the army.

Mahalo nui,
Jordan Kapono Nakamura

From: [Leonard Nakoa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Army EIS statement
Date: Thursday, May 8, 2025 6:09:23 AM

HOWZIT, I an fully against the Army's E.I.S statement. Due to a lot of misinformation and lack of important research. Shoots. I would also like to testify remotely. Please respond to my request.

From: [Sancia Miala Shiba Nash](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT the Army's Final EIS
Date: Thursday, May 8, 2025 6:53:18 AM

Aloha kākou,

My name is Sancia Miala Shiba Nash, I'm a documentary filmmaker from Maui currently living in O'ahu. I am writing to ask for the BLNR to reject the Army's Final EIS.

For over a century, the U.S. military has poisoned and desecrated Hawaiian land. Many of these former and current military bombing sites across the archipelago remain uninhabitable. The U.S. Army, well aware of its contamination at Pōhakuloa, refuses to restore and clean it up, and therefore should not be allowed to continue its training practices there. The negative impacts of U.S. army presence, environmentally and culturally must be considered and acted upon to ensure the wellbeing of future generations and all life forms in these islands. E ola!

Mahalo for your time.
Sancia Miala

Sancia Miala Shiba Nash
puuhonua-society.org/nmoka-cataloging
sanciamiala.com

From: ["Auli"i Nathaniel](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] OPPOSE Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Thursday, May 8, 2025 6:30:54 AM

Aloha Members of the Board of Land and Natural Resources,

My name is ‘Auli‘i Nathaniel, 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. The military has been a poor steward of this ‘āina. When Maunaloa erupted, people were told to they shouldn’t wander of the Saddle not because of the volcanic dangers but because of unexploded ordnances. This particular warning felt emblematic of the relationship the military has had with Hawai‘i. It should be kapu because it is sacred, not because it has been so poorly treated by humans as to be an infinite danger. Pohakuloa - the piko of this island - has been bombed, poisoned with depleted uranium, been the lit on fire, and it’s fragile ecosystem hangs in the balance. And all for a dollar? It is shocking that renewal is even on the table at all.

I urge the BLNR to reject the Final EIS and deny the lease renewal.

Mahalo for your time and consideration,

‘Auli‘i Nathaniel

Volcano, Hawai‘i

From: [Joshlyn Noga](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] End the lease!
Date: Thursday, May 8, 2025 6:43:56 AM

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,
Joshlyn Noga

From: [Melissa Lehua Novikoff](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Non- Renewal - Opposition to Agenda Item D1 – Non-Renewal of Military Lease at Pōhakuloa Training Area
Date: Thursday, May 8, 2025 6:20:28 AM

I strongly oppose the renewal of the 65-year lease for military use of land at Pōhakuloa Training Area (PTA) and urge the State to *cease all military activity, including live-fire drills, bombing, and non-compensatory actions in Area D-1*. I also call for the State to *reject the Final Environmental Impact Statement (EIS)* for the Army's proposed land retention. The EIS is inadequate and fails to sufficiently assess the profound environmental and cultural harms associated with continued military activity.

Pōhakuloa is a wahi pana — a sacred, storied place that holds deep significance for Native Hawaiian culture and history. It is also a critical ecological site, home to endangered species found nowhere else on Earth. Continued military occupation and live-fire exercises are incompatible with its *conservation district designation* and violate the intent of environmental protections.

The Army has demonstrated an inability and unwillingness to be a responsible steward of this land. For instance:

- Nearly **20,000 acres** have been burned under Army management, including habitat critical to endangered species.
- The **ongoing use of live-fire and bombing** poses serious risks of long-term environmental contamination, water degradation, and public health harm — especially due to the **aerosolization of depleted uranium**, a known health hazard linked to cancer and other illnesses.
- The **Final EIS lacks sufficient mitigation plans**, failing to address both the immediate and cumulative impacts on the land and the community.

Furthermore, the **Hawai'i Supreme Court in *Kahaulelio v. DLNR* (2019)** reaffirmed that the State has "*the highest duty to preserve and maintain trust lands,*" even in the absence of lease violations. The Court ruled that the State breached its duties by failing to:

- Adequately monitor military use,
- Enforce cleanup and safety measures,
- Take prompt action when contamination or violations occurred, and
- Maintain transparency and documentation.

These failures continue today, and the military's track record offers no reason to believe future compliance or care will improve.

Conclusion:

The continued military use of Pōhakuloa is in clear conflict with the values of mālama 'āina and the State's constitutional trust obligations. The land must be restored and protected — not

further damaged under another decades-long lease. I respectfully urge you to:

- **Deny the renewal of the military lease (Agenda Item D1),**
- **Cease all military activity at Pōhakuloa, and**
- **Reject the Final Environmental Impact Statement.**

Protect the ‘āina. Uphold your trust duty. Say no to further military use of Pōhakuloa.

Mahalo for your consideration,

Melissa Lehua Novikoff

From: [Michael Gervacio Olivas](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Thursday, May 8, 2025 6:41:44 AM

Certainly. Here's a more formal version of your statement:

To the Honorable Members of the Board of Land and Natural Resources,

My name is Michael Gervacio-Olivas, and I am submitting this testimony in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area, as well as to the proposed renewal of the United States Army's lease of these lands.

Pōhakuloa is designated as a conservation district and recognized as a *wahi pana*—a storied and sacred landscape of profound spiritual and historical significance to Kānaka 'Ōiwi. It is also home to one of the last remaining sub-alpine tropical dryland ecosystems in the world. For over six decades, this sacred land has suffered extensive degradation at the hands of the military, including bombardment, contamination with depleted uranium, frequent wildfires, and persistent violations of the terms set forth in the original 1964 lease agreement, which was issued for the nominal sum of one dollar.

The Final EIS, in its current form, is deeply flawed and misleading. It fails to accurately or adequately account for the extensive environmental damage, cultural desecration, and sustained public opposition that have defined the military's presence at Pōhakuloa. Moreover, it presumes future compliance without addressing the Department of Defense's long-standing pattern of noncompliance with state regulations and county resolutions—particularly those adopted in 2008 that explicitly called for a cessation of live-fire exercises and the remediation of existing contamination.

It is important to note that the judiciary has already determined that the State has failed in its duty to protect these lands. To approve this Final EIS and proceed with the lease renewal absent genuine accountability would constitute a dereliction of your fiduciary and public trust responsibilities. It would also further enable the continued desecration of a place that should never have been subjected to military exploitation.

I respectfully urge the Board to reject the Final Environmental Impact Statement and to deny the lease renewal. Pōhakuloa is not a bombing range—it is sacred land that must be restored and protected, not subjected to further harm.

I implore you to uphold your kuleana to the 'āina and the people of Hawai'i. Reject the Final EIS.

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Aloha,

Michael Gervacio-Olivas

Salinas, California

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From: [Jonathan Osorio](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony RE. Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai'i,
Date: Thursday, May 8, 2025 6:26:34 AM

Members of the Board of Land and Natural Resources

My name is Jonathan Kay Kamakawiwo'ole Osorio. I am a thirty year professor of Hawaiian Studies and currently the dean of the Hawai'inuiākea School of Hawaiian Knowledge at the University of Hawai'i. I am also the president of KAHEA the Hawaiian Environmental Alliance, whose testimony you have already received. Finally, I was born and raised on Hawai'i island and was actually on the 'āina of Pōhakuloa and witnessed military training as a child accompanying my father, Army Reserve Captain Elroy Osorio, on a father son weekend in 1961.

I have a sense of kuleana for that 'āina as every one of you on this board should also possess, and I must say that given the Army's failure, in their FEIS, to provide anything in the way of assurance to the public that it is not causing harm to that 'āina, and that the effect of those harms may very well extend to our people, you must reject this FEIS. Below is the conclusion of our KAHEA testimony

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

I am certain that I do not need to detail the history of US military occupation in Hawai'i and the impacts that their presence here have had on our environment, from superfund sites in Pu'uloa to the devastation of Kaho'olawe. But the US military has also had a profound social and political impact on Hawai'i, enabling the seizure of our Kingdom government and the dispossession of over 2 million acres of Crown and Government lands from the Hawaiian people.

Following the attack on Pearl Harbor, the US military ruled Hawai'i under martial law until October, 1943, a period in which the territorial legislatures, courts and governor's authority were suspended along with the constitutional rights of all of Hawai'i's residents. In the aftermath of the second world war, the US military enjoyed tremendous political influence and was able to engineer remarkable leases with state agencies such as the 23,000 acre lease on Pōhakuloa with the Department of Hawaiian Homelands for \$1.00.

Today, the political crisis in the United States, coming from the erratic and harmful edicts of its president, demand a much stronger protection of our lands and people by the State of Hawai'i and by our county governments as well. In particular, the President's denial of climate change and indifference to environmental damage **will** guide the practices and operations of the military. Therefore, this Board must do what neither the Army nor its Commander in Chief will do: demand comprehensive study and rigorous examination of the impact military use is having on any of the lands of our pae'āina that it uses, and refuse to issue or renew any leases unless the highest standards of environmental impact review are employed.

Our testimony demonstrates that nothing approaching such standards are evident in this FEIS.

I believe that you have no alternative but to reject it.

Jonathan K Osorio, PhD
Wahiawā, Hawai'i

From: [Aloha P](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 5:03:17 AM

Aloha Chair Case and Members of the Board,

I strongly oppose the U.S. Army's Final Environmental Impact Statement for Pōhakuloa.

For 60 years, the Army has caused environmental and cultural harm — wildfires, depleted uranium, and the destruction of irreplaceable 'āina — and paid just \$1 for the land. This EIS does not address these harms or offer a real plan for cleanup.

If the Army cannot restore the land, they should not be allowed to stay on it. Please reject this EIS.

Mahalo,
Aloha Paakaula

From: [Hali Pacheco](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written Testimony Pacheco, Kanoe
Date: Thursday, May 8, 2025 6:23:52 AM

Aloha,

Please find my written testimony calling for the BLNR to reject the Army's final EIS statement.

https://docs.google.com/document/d/1w_YAHyT_ce8NkeGYNL5VzwIVrx9RpZ6-/edit?usp=drivesdk&oid=105324066662569221770&rtpof=true&sd=true

Mahalo,
Kanoe

Hali Kanoelani Pacheco
Hoapili Academic Support Specialist
University of Hawai'i Maui College
310 Ka'ahumanu Ave, Kahului, HI 96763

From: [Leon No'eau Peralto](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony re: Opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area; Reject the Army's EIS
Date: Thursday, May 8, 2025 1:16:26 AM

Aloha Land Board Members:

I am writing as a Kanaka 'Ōiwi of Hāmākua, Hawai'i 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. These lands are part of Ka'ohe, Hāmākua, which is home to our largest aquifer on this island—a source of life for all who call this island home. 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. Let Kaho'olawe stand as an important reminder of the dire ramifications and irreparable harm of military abuse of our homelands, and also of the regenerative healing that comes with returning 'āina to its ancestral stewards. It's time to return these lands to the people of Hawai'i to begin a genuine process of healing and restoration. The future generations of this place are depending on us.

From: [Angel Permito-Kaheaku](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa – Reject the U.S. Army's Final EIS
Date: Thursday, May 8, 2025 12:58:53 AM

Aloha mai kākou,

My name is Angel Permito-Kaheaku. I am a kanaka maoli and resident of Hawai'i and I oppose the continued use of Pōhakuloa for military training due to the harmful impacts to 'āina, including the contamination of water and destruction of the surrounding ecosystem.

I am writing to respectfully submit this testimony requesting that the Board of Land and Natural Resources rejects the U.S. Army's Final EIS for the Army Training Land Retention at the Pōhakuloa Training Area.

The U.S. Army has admitted to contamination, yet fails to adequately assess and clean up the contamination from their training activities. The U.S. Army has also failed to provide:

1. Transparency in the safety procedures or spill data from the training site
2. A sufficient plan in mitigating environmental or cultural impacts

Hawai'i has seen similar activities on Kaho'olawe and in Mākua and I understand the (past and present) activities that occur at military practice sites risk irreparable damages to our 'āina – I will never consent to the desecration of 'āina.

--

Me ka ha'aha'a,

Angel Permito-Kaheaku
(808)753-8357

From: [Reyna Pila](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 2:53:24 AM

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

My name is Reyna Pila from Honolulu. 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,

Reyna Pila

From: [Dylan Pilger](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area
Date: Thursday, May 8, 2025 4:37:07 AM

Date: May 8th, 2025

Aloha Chair Chang and Members of the Board,

My name is Dylan Pilger. I hold a Bachelor of Science in Biochemistry, a Master of Public Health specializing in Native Hawaiian and Indigenous Health, and am a proud 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. This is particularly important when considering prior usage of aqueous film-forming foams containing per- and poly-fluoroalkyl substances which are known to be long-lasting in the natural environment and associated with a wide-range of negative health impacts.

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,

Dylan Pilger
Mō'ili'ili, O'ahu
Hui Aloha 'Āina o Honolulu

From: [Bratche Power](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Final EIS
Date: Thursday, May 8, 2025 12:46:18 AM

Hello,

My name is Maeve Whelan, and I'm writing to strongly oppose 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, and holds great spiritual and historical significance for Kānaka 'Ōiwi. For more than 60 years, the military has been desecrating this 'āina by bombing it, by contaminating it with depleted uranium, by starting wildfires, and by violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It ignores or downplays decades of environmental destruction, cultural harm, and community opposition. It presumes future compliance without taking seriously the military's historical harmful behaviors 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,
Maeve Whelan, Indiana

From: [In Place](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Thursday, May 8, 2025 4:40:46 AM

Land Board Members:

As a nature educator, 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,
Taira Restar



Taira Restar

In Place

inplacelearning.org

"The land is the real teacher." Robin Wall Kimmerer

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

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

Dear Chairperson Chang and Members of the Board:

I am MGen Edward V. Richardson, Retired State Adjutant General for the State of Hawaii and a member of the Chamber of Commerce of Hawaii's Military Affairs Council (MAC). I am writing in full support of the U.S. Army's request to retain training lands at the Pohakuloa Training Area (PTA)

PTA allows our military forces based in Hawaii with the ability to train year-round in terrain that that is like what they would normally encounter in the Pacific. As you know, training is the key to success in combat and denying from our troops of tough realistic training is something that we would not want to do.

I urge you and members of the board to review the Final Environmental Impact Statement. I am sure that the Army is making a sincere effort to identify solutions that will preserve lands of cultural and agricultural value while ensuring that training missions can continue. Hopefully you will agree with our assessment.

There is also a need to determine a fair way to compensate the State and the people of Hawaii for the use of PTA.

PTA has been with us for more that 82 years. The demands of World War II created the need for a place to train that could accommodate the two Marine Divisions slated to be based on the Big Island and Maui.

The 4th Marine Division and the 5th Marine Division participated in 4 major amphibious landings on Kwajalein, Saipan, Tinian and Iwo Jima. These landings were conducted within a 12 month and paved the way toward building the airfields needed for our B-29 bombers whose bombings ended the war in Japan.

Thank you again for your service and kind attention to this very important issue.

Sincerely,

MGen Edward V. Richardson USAF (Ret)

From: [‘Āina Momona](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] PTA Testimony
Date: Thursday, May 8, 2025 4:55:45 AM

Board of Land and Natural Resources
State of Hawai‘i
Department of Land and Natural Resources
1151 Punchbowl Street
Honolulu, Hawai‘i 96813

RE: Request to Defer Decision on the Final Environmental Impact Statement for the Pohakuloa Training Area Long-Term Lease Renewal

Aloha Chair Chang and Members of the Board,

On behalf of ‘Āina Momona, I write to respectfully urge the Board of Land and Natural Resources to defer acceptance of the Final Environmental Impact Statement (FEIS) for the proposed long-term lease renewal of the U.S. Army’s Pohakuloa Training Area (PTA). The Army’s FEIS fails to satisfy the requirements of Hawai‘i Revised Statutes Chapter 343 because it is based entirely on outdated data and does not include any new biological or archaeological field surveys. As a result, there is no current inventory of the natural and cultural resources present on these public trust lands—lands that are ecologically vital, culturally sacred, and deeply tied to Native Hawaiian identity and practice.

I write to you not only as the founder of ‘Āina Momona, but as someone who has spent a lifetime standing up for Hawai‘i’s lands, ocean, and people. Nearly 50 years ago, we sought to reclaim Kaho‘olawe because we knew that it was wrong to use our beloved ‘āina for testing weapons and preparing for war. It was wrong then. It remains wrong now. These are *ceded lands*—lands taken from the Hawaiian Kingdom and held in trust by the State—and they must be treated with care, accountability, and respect. You as members of the BLNR have the kuleana to hear our voices, for as Native Hawaiians, we are the voice of this land.

The Army has had decades to prepare for the expiration of its lease at PTA. The 2029 deadline is no surprise. It was not sudden. It has been on the horizon since the lease was first signed in 1964. The Army’s failure to conduct timely biological and archaeological surveys is not the result of circumstance—it is the result of neglect, mismanagement, and arrogance. The Board should not be pressured or influenced by arbitrary timelines. The burden of this failure lies solely with the Army, and they deserve no sympathy from DLNR or anyone else. Allowing a long-term lease renewal to proceed without new field surveys, without a good faith effort to understand what resources exist on these lands, and in ignorance of how our community feels about a lease renewal would be a clear violation of HRS Chapter 343 and a betrayal of the Board’s responsibilities under the public trust doctrine. The FEIS provides no updated archaeological inventory, no current biological data, and no real understanding of how this proposal might impact burials, sacred sites, endangered species, or traditional practices. This is not pono—and it is not legal.

These 23,000 acres are not just lands on a map—they are part of our collective inheritance. Under Article XII, Section 7 of the Hawai‘i State Constitution, you are obligated to protect Native Hawaiian traditional and customary rights. You cannot do that without knowing what

is on the land. And right now, the Army has made sure you don't.

Our community has made it perfectly clear that the renewal of these leases will have a severe impact on our environment and our cultural practices. There are those of us who have risked our lives to stop the U.S. Military from bombing our land. In 2026, we will mark the 50th anniversary of the Kaho'olawe landings—when our people took on the U.S. military and won. That movement was not only about reclaiming an island, but about protecting the very soul of our homeland. The question before you now is whether you will uphold that legacy—or allow history to repeat itself.

We respectfully call on this Board to defer acceptance of the FEIS until such time as the Army revises the document to include updated, comprehensive biological and archaeological field surveys. These studies must provide a current and good faith disclosure of the cultural and environmental resources present on state lands. They must include the voices and concerns of our people. Only then can you make a lawful and informed decision. Only then can you fulfill your kuleana to the land and to our future generations.

Mahalo for your time, your service, and your courage in standing up for what is right.

Me ka 'oia'i'o,

Walter Ritte

Founder, 'Āina Momona

--

Donate to 'Āina Momona: <https://secure.actblue.com/donate/aina-momona>

Walter Ritte, Founder

'ĀINA MOMONA

P.O. Box 924 | Ho'olehua, HI 96729

www.kaainamomona.org

From: [shelbie rosa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 5:34:29 AM

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,

Mahalo,
Shelbie Rosa
Oahu, Hawaii

From: [Tiffany](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Thursday, May 8, 2025 12:48:10 AM

Aloha Members of the Board of Land and Natural Resources,

My name is Tiffany Sabado, 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,
Tiffany Sabado
Kāne'ohe, Hawai'i

From: [Davina Sanders](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Subject: Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Thursday, May 8, 2025 6:18:35 AM

Oh honest Americans, Members of the Board of Land and Natural Resources:

Hear me, Davina Sanders, and "lineal descendant" of aina Pōhakuloa. I am writing to express 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 an invaluable ecosystem. It also holds deep spiritual and historical significance as a sacred cultural landscape for Kānaka ʻŌiwi and my ohana. For over six decades, this ʻāina has suffered desecration by the military through bombings, contamination, wildfires, and breaches of the original lease terms.

The Final EIS fails to adequately address the extensive environmental damage, cultural harm, and community opposition accumulated over the years. It presumes future compliance without acknowledging the military's history of neglect and repeated violations of state law and county resolutions demanding a cessation of live fire and a cleanup of existing contamination.

Given the courts' ruling on the State's failure to protect this land, approving the EIS and renewing the lease without proper accountability would be a violation of your trust responsibilities, enabling further destruction of a place that should never have been designated for military training.

I implore the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa deserves to be healed and protected, not further harmed.

Please stand for the ʻāina and reject this Final EIS.

Mahalo for your time and consideration.

Sincerely,
Davina Sanders
Hauula, Oahu, Hawaii

E hele i kahi ʻē, E hele pēlā
Kū aʻe a hele i waho a
E hoʻi nō ʻai i kou kahu
E hoʻi kou hale
E ʻai na lapu kou lōlō

From: [Ryan Saunders](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] BLNR should reject current Army EIS May 2025
Date: Thursday, May 8, 2025 4:21:28 AM

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.

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.

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,

Ryan Saunders

Honolulu

From: [Sandy S.](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Testimony
Date: Thursday, May 8, 2025 5:28:05 AM

I urge you to reject the EIS for Pohakuloa for the following reasons:

The state has a constitutional duty to Malama ‘Aina, approval of the EIS runs counter to that duty for many reasons, but here are a few I feel are most important:

- The US Army is not taking care to protect sacred sites. Pohakuloa is a wahi pana, the Army does not have an adequate plan to mitigate the cultural and environmental impacts of the damage they are doing.
- Pohakuloa is zoned as State Conservation Land. Allowing the military to bomb the land and have live fire exercises is counter to what the land is intended for. These lands are meant to be preserved, not destroyed.
- The Army is not cleaning up after themselves and they have no intention of doing so in the future. They haven't even cleaned up the depleted uranium they left sixty years ago and they openly admit to leaving all ammunitions from exercises where they land, for "safety reasons". Who's safety? It certainly isn't for the people of Hawaii. Have we not learned anything from years of the military coming in, destroying the environment, and leaving a mess for the state to pick up? This has got to stop and we need our state government to stand up for what is right.
- Pohakuloa is home to several endangered species of birds and over two dozen endemic plant species that are listed as endangered, threatened, or species of concern.

I urge you to do what is right and follow your Constitutional duty to protect Hawaii.

Respectfully,
Sandra Schafer
76-4326 Kinau St
Kailua Kona, HI

From: [Isaiah Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Isaiah Smith Testimony: REJECT Army's EIS for Pōhakuloa
Date: Thursday, May 8, 2025 7:05:02 AM

Aloha, my name is Isaiah Smith, current resident of Makiki but originally from Hawai'i Island. As kama'aina of Moku o Keawe, the issue of Pōhakuloa is near and dear to my heart and I call on the department to REJECT the Army's EIS on the grounds of

- The army's admittance to contamination of the environment but the refusal to clean up or even assess the contamination.

- The lack of disclosure of sacred sites/sites of historical and cultural importance to the Native Hawaiian people. Though at least in one instance there was some reasoning (albeit still not great) for the non-disclosure of funerary items and burial site, it shows the lack of disclosure overall and there needs to be more investigation and inclusion of cultural sites like that in the EIS.

- The lack of proof that contamination has not and/or cannot occur to local water sources due to ordinances, chemicals used etc at Pōhakuloa.

- The fact that the army will not share safety procedures or spill data to authorities and the public and deletes critical information involving this.

- The lack of inclusion in the EIS of cumulative impacts on the environments of Pōhakuloa by the Army's presence.

AND

- The lack of evaluation on the direct and/or indirect dangers caused to endangered species and vulnerable ecosystems in Pōhakuloa and its surrounding areas.

Even a couple of these reasons should be grounds for the refusal of the Army's EIS of Pōhakuloa, please refuse their EIS and also ultimately I would like the Army's lease to not be renewed for Pōhakuloa. Mahalo nui for your time

Sincerely yours,
Isaiah Smith

From: [Michelle Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Thursday, May 8, 2025 4:57:49 AM

Aloha my name is Michelle Smith,

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

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

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

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

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

3. Failure to meet public trust duties:

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

4. Harm to Native Hawaiians is ongoing and ignored:

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

5. Dangerous precedent if this FEIS is accepted:

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

6. Avoidable harm from lack of surveys:

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

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

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

8. Final ask:

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

From: [Menehune Soap](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa No to new lease
Date: Thursday, May 8, 2025 6:45:11 AM

As a kanaka 'O'iwi and a United States Navy veteran, I am opposed to the lease renewal. There are 113 military bases in Ko Hawai'i Pae Aina alone, more than any other place in the United States. For too long the military has gotten away with poisoning our drinking water, destroying our aina and blocking kanaka from their gathering and religious rights. How would you feel if every time you wanted to go to church you had to ask the Government for permission? There is no reason at all to continue leasing out lands to the military, it does not benefit Hawai'i as a whole. I don't understand how you guys can continue to support the destruction of Hawai'i and its people. The continental United States is large enough to accommodate the military and its operations. Get them out of Hawai'i and return the lands to the Hawaiian people so we can once again become sustainable. Stop catering to the Military and take care of the people of Hawai'i. No country wants Hawai'i but the United States, that's who we need protection from. These lands are still Hawaiian kingdom lands per International Law, per United Nations, per Hague Convention. And let's not forget Larson v Hawaiian kingdom, where the outcome states Hawaii is under illegal occupation by the United States. Be for real!!

Mahalo
Leinani Graf
LS2 USN Retired

From: [Lahela Spencer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Pohakuloa
Date: Thursday, May 8, 2025 5:41:18 AM

Aloha, my name is Lahela Spencer . 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,
Lahela Spencer

From: [Robert Tan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to Renewal of US Military Lease at PTA
Date: Thursday, May 8, 2025 7:02:34 AM

Aloha Honorable Representatives of Hawai'i,

I hope this email finds you well. I am writing to express strong opposition and urging you to reject the renewal of the U.S. military lease at the Pōhakuloa Training Area on the Big Island.

For decades, military activity at Pōhakuloa has contributed to environmental degradation, contamination of sacred lands, and the desecration of cultural heritage sites. The land has already endured extensive damage from bombing, live-fire training, and hazardous waste, with long-lasting consequences for native ecosystems and community health.

It is deeply troubling that while the State is considering implementing a “green fee” on tourism to help address the climate crisis and environmental degradation, it simultaneously allows one of the most polluting institutions in the world—the U.S. military—to continue destructive practices on Hawai'i's public lands.

The continued leasing of these lands for military purposes disregards the expressed concerns of Native Hawaiian communities, environmental scientists, and residents who seek a future rooted in sustainability, respect for 'āina, and cultural preservation.

Hawai'i's public lands must be protected for future generations. The time has come to end the leasing of sacred and sensitive lands to entities that treat them with violence rather than care. Instead, we should invest in restoring these areas, honoring Native Hawaiian stewardship, and building a future rooted in peace, sustainability, and respect for 'āina.

Mahalo for your time and your leadership on this critical issue.

Kind regards,
Robert

From: [Lani](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 6:40:25 AM

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,
Lani Tokunaga-Rabin
Oahu

From: [bubba boo boo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Thursday, May 8, 2025 3:33:05 AM

My name is Brian Vaughn and I live in Berkeley, California. I'm writing to encourage the cessation of any contract allowing the military to continue using the Hawaiian Islands as a practice range for heavy ordinance.

My father was a WW2 veteran and I understand the importance of our military being in Hawaii - well trained and at the ready. However, the island of Hawaii is the youngest land in the U.S. and should be preserved for prosperity.

While this training is essential to our military's readiness and practicing in a different area may present logistical challenges and increased costs - another solution should be found.

Sincerely, Brian Vaughn.

From: eeekadog@yahoo.com
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 5:31:15 AM

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

My name is Clifford Wassman and I am from Mililani. I respectfully urge you to do the right thing and reject the clearly insufficient FEIS in Item D-1.

The Military has been a poor steward of the land and you have a duty to all of us to protect our limited natural and cultural resources.

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 testify.

Sincerely,

Clifford Wassman

From: [Aiko Yamashiro](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for agenda item D-1
Date: Thursday, May 8, 2025 7:04:08 AM

Aloha,

My name is Aiko Yamashiro and I am from Kāne'ohe. I am writing to request the BLNR reject the FEIS on Pōhakuloa. It is deficient and disrespectful to the magnitude of the place and the many people of our community who love and care for it.

It is all our responsibility and privilege to mālama our 'āina for past, present, and future generations.

Thank you for your leadership,
Aiko Yamashiro

From: [Anela Akau-LaClair](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Thursday, May 8, 2025 7:50:17 AM

Aloha,

My name is Anela Akau-LaClair and I am submitting testimony on behalf of myself and my 'ohana for item D.1 on the agenda to strongly urge the BLNR to reject 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.

The army admits to contamination caused by training activities but has not conducted adequate assessments to map the extent of the contamination and prove that contamination hasn't spread into water or ecosystems. Additionally, the army has admitted to the finding of cultural artifacts within the training area and has not conducted thorough surveys to determine the extent of culturally significant resources. The refusal to complete biological and archaeological surveys could lead to the permanent loss of endangered species, iwi kūpuna, and cultural artifacts.

The FEIS ignores the relationship that Native Hawaiians have with the 'āina of Pōhakuloa. It fails to account for the harms to health, identity, and spirituality caused by six decades of bombing and desecration. As a lifetime resident of Waimea, Hawai'i I come from a long line of Hawaiians that lived off these lands for generations and to experience and feel the bombs destroying and polluting my home is heartbreaking.

Not only should the BLNR reject the FEIS and not allow renewal of the army's lease for Pōhakuloa but they should revoke the current lease and prevent any further harm and neglect to these heartlands of Hawai'i.

Mahalo for upholding your kuleana to protect and preserve the lands and resources of Pōhakuloa.

From: [makaulaclair](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for D1 to reject FEIS PTA
Date: Thursday, May 8, 2025 7:36:39 AM

Aloha,

My name is Mia Akau-LaClair and I am submitting testimony on behalf of myself and my 'ohana for item D.1 on the agenda to strongly urge the BLNR to reject 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.

The army admits to contamination caused by training activities but has not conducted adequate assessments to map the extent of the contamination and prove that contamination hasn't spread into water or ecosystems. Additionally, the army has admitted to the finding of cultural artifacts within the training area and has not conducted thorough surveys to determine the extent of culturally significant resources. The refusal to complete biological and archaeological surveys could lead to the permanent loss of endangered species, iwi kūpuna, and cultural artifacts.

The FEIS ignores the relationship that Native Hawaiians have with the 'āina of Pōhakuloa. It fails to account for the harms to health, identity, and spirituality caused by six decades of bombing and desecration. As a lifetime resident of Waimea, Hawai'i I come from a long line of Hawaiians that lived off these lands for generations and to experience and feel the bombs destroying and polluting my home is heartbreaking.

Not only should the BLNR reject the FEIS and not allow renewal of the army's lease for Pōhakuloa but they should revoke the current lease and prevent any further harm and neglect to these heartlands of Hawai'i.

Mahalo for upholding your kuleana to protect and preserve the lands and resources of Pōhakuloa.

Mia Akau-LaClair

From: [Audrey Alvarez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Re: We demand BLNR reject the U.S. Army's PŌHAKULOLOA FEIS
Date: Thursday, May 8, 2025 7:54:23 AM

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,
Audrey Alvarez
Honolulu, HI

[Sent from Yahoo Mail for iPhone](#)

From: [Wyatt Bartlett](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area
Date: Thursday, May 8, 2025 7:44:42 AM

Date: 2025-05-08

Aloha Chair Chang and Members of the Board,

My name is Wyatt Bartlett, and I am a concerned citizen and kama‘āina of Hawai‘i nei. 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,

Wyatt Bartlett
Honolulu, O'ahu
Hawai'i

From: [Holokai Brown](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] EIS for Pohakuloa
Date: Thursday, May 8, 2025 7:41:40 AM

Hello,

I would like to testify that the EIS for Pohakuloa is inadequate. The military has not been a good steward of the land and their lease should not be renewed.

Thank you,
Holokai Brown

From: [Christina Busby](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Decision-making on the Army's Final EIS for the Pōhakuloa Training Area
Date: Thursday, May 8, 2025 7:29:57 AM

Aloha kākou,

My name is Christina Busby. I am a former public school teacher, a current PhD student at UH Mānoa, and a Native Hawaiian resident of Honolulu. I am writing to urge the Board of Land and Natural Resources to reject the US Army's Final Environmental Impact Statement for the Pōhakuloa Training Area. The board must reject the Army's FEIS outright as insufficient in addressing the issues of conservation zoning, UXO clean up, water table evaluation, and cultural impacts. The BLNR must reject the FEIS because the Army has already admitted widespread contamination but refuses to assess or clean it up. The Army cannot prove that contamination has not spread into water or ecosystems. Further, fires, endangered species, and climate harms are dismissed without evidence. And finally, the FEIS evades Hawai'i law by ignoring obvious cumulative impacts.

Along with rejecting the FEIS, the BLNR must also implement the following:

- An immediate ceasefire on all conservation lands in Pōhakuloa and the Army must not be allowed to apply for re-zoning classification
- An immediate and complete survey of the total acreage, including clean-up and restoration efforts with the millions of dollars that the Army is annually allotted
- And finally, re-address the Cultural Impact Assessment (CIA) and the effects of bombing the energetic piko of Hawai'i

The people of Hawai'i, especially the Indigenous people of this land, are demanding an end to the military leases and an end to the bombing and destruction of our sacred, ancestral lands. In Hawaiian cosmogony, 'āina is a living entity and a family member. The Hawaiian people are direct descendants of the land itself. The bombing is a direct attack on our kūpuna. The US military has caused irreparable harm and damage to the Hawaiian islands through its use of land and ocean for live fire training, the storage of weapons and fuel, and many other uses. It is time to demilitarize Hawai'i and return these leased lands back to the stewards of the 'āina for protection and conservation of these precious resources and archaeological sites.

It's time for the US military to clean up its mess and help the land and the people heal. It's time to take accountability for decades of pollution and abuse of the land, which is the sacred ancestor of Native Hawaiian people. It's time to be pono and return the land back to

Native Hawaiians. These sites have been blocked off to the people who are the rightful stewards of these places, blocked off to people who have unique knowledge of these lands. We are prevented from fully practicing our culture and caring for our sacred sites.

To ensure a future world where all living things thrive, the Pacific Ocean must be healthy. And in order for our ocean to be healthy, we must have a demilitarized and denuclearized Pacific. The survival of our planet and all living things depends on this. Let's start here and now. Instead of a dominating military presence at Pōhakuloa, I imagine the military and community working together to clean and repair the land. There are so many possibilities beyond power, control, imperialism, and destruction. I refuse to believe a narrative that says military domination of these lands is the best possible outcome. We must be forward-thinking and look to the future. We must imagine, together, the world we want our descendants to inherit, and we must work now to cultivate that future. We need 'āina in order to live and to create; instead, the US military has brought bombs, poison, destruction, and death, all under the guise of "protection." We need 'āina for growing food and building homes, and both are impossible if we continue to give the US military a free pass to make our 'āina uninhabitable. BLNR is responsible to the 'āina. You must be pono, do the right thing!

Mahalo,

Christina Busby

From: [Krystal Chavez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's Final EIS
Date: Thursday, May 8, 2025 7:29:32 AM

Aloha to whom may be receiving this email,

I am writing to urge that you REJECT the Army's final EIS for the reasons stated below. POHAKULOA IS HAWAIIAN LAND and is therefore SACRED. The U.S is responsible for tremendous amounts of damage and has never publicly set any intention in reversing or fixing the desecration. Kaho'olawe and Makua are both sacred places and just like them Pōhakuloa should stop being bombed and desecrated.

The army has admitted the widespread contamination and cannot prove that it hasn't leached into our ecosystems and water. Which is a public safety concern and puts our health at risk. The army refuses to share spill data and deletes critical information. If they should continue they must be held accountable for the damage done since it involves essential resources and effects our already fragile environment.

Please be a voice for the people and work in favor of protecting Hawaiian lands, Hawaiian people and the communities that reside within Hawai'i.

Mahalo,
Krystal Chavez

From: [Kainani Clark](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for agenda item D-1
Date: Thursday, May 8, 2025 7:14:46 AM

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

My name is Kainani Clark, I am a Kanaka Maoli mother of 3, and I live in Waimea on Hawaii Island. 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.

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 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.

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,

Kainani Clark

From: [Shauna Cordero](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in OPPOSITION of US Military FEIS for POHAKULOA
Date: Thursday, May 8, 2025 7:27:50 AM

To the Board of Land & Natural Resources,

I am submitting this testimony in firm opposition to the U.S. military's FEIS & lease renewal at Pōhakuloa, and I do so not just as an individual, but as a kanaka maoli whose connection to this land stretches back generations. My ancestors resided here before the illegal overthrow of the Hawaiian monarchy in 1893, and their stewardship of this 'āina is a responsibility I carry today. This is my home—my ancestral and present home—and it deserves more than continued abuse at the hands of the U.S. military. Today, I am the last of my siblings still residing in Hawai'i, while the rest of my family has been displaced, forced to leave due to the lasting effects of colonization and the military's presence. The same forces that have devastated Pōhakuloa have also pushed my own family away from the land that should sustain us.

For over 70 years, Pōhakuloa has been subjected to live-fire training, turning sacred ground into a dumping site for weapons, destruction, and disregard. There has been no ordinance cleanup since 1964, and the military has made it clear that it has no intention of addressing the contamination—citing "safety concerns" while continuing the very activities that pose the greatest danger to the land. This does not even begin to address the irreversible damage to the unique ecosystems on the island. How is it safe to leave weapons buried in the earth, but not safe to remove them?

This is not just about Pōhakuloa. We have seen the consequences of military occupation time and again—most recently at Red Hill on O'ahu, where fuel contamination has poisoned our water, sickened families, and forced communities to fight for clean, uncontaminated resources. How many times must we witness this kind of destruction before actual change occurs?

The people of Hawai'i have spoken. We do not support this lease renewal. We do not condone continued militarization at the expense of our ecosystems, our safety, and our future.

Pōhakuloa is not just land—it is history, culture, and life. It is time to put stewardship over exploitation.

I urge the Board of Land & Natural Resources to reject the Final Environmental Impact Statement and deny the lease renewal. Hawai'i deserves better.

Me ka ha'aha'a,
Shauna Cordero [SHRM-CP](#)

(808) 896-7488 ,

From: [Keoni DeFranco](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's Final EIS
Date: Thursday, May 8, 2025 7:32:26 AM

Aloha kākou.

I call on the BLNR to reject the Army's Final EIS.

The BLNR has a trust duty to reject this EIS. The Army admits to widespread contamination but refuses to clean it up. The Army cannot prove that contamination hasn't spread into our water table or ecosystems. The Army is withholding safety procedures and spill data, while also deleting critical information. The Fires on the property endangered species and climate is harmed with no remorse. The FEIS evades Hawaii Law by ignoring the cumulative impacts of live fire occurring at PTA regardless if live fire is occurring on the state leased lands or not, that is where the barracks and weapons are stored. The BLNR should listen to the people of Hawaii and reject the EIS.

From: [Dirty Roots](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakulani
Date: Thursday, May 8, 2025 7:51:20 AM

Stop bombing, no more polluting our water, end of discussion

From: [kimberely dixon](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Rejection of US Army's EIS
Date: Thursday, May 8, 2025 7:48:42 AM

To whom it may concern,

I implore the US Army to cease the bombing practice on sacred lands on the Hawaiian Islands. It is tone deaf for the US Army to continue this practice, knowing these are sacred lands to the Kanaka Maoli. These egregious actions must cease and the US Army needs to find another testing site or different way. It is shameful that this practice still exists and while it may have begun in ignorance it can no longer be claimed as ignorance. This is a willful act of atrociousness against the indigenous people, their ancestors and legacy.

Please withdraw,
Kimberely Keli'ikoa Dixon

Kimberely A. Dixon M.S. MOL
Executive Consulting, Coaching & Motivational Speaker
Focused intervention Team (FITCOG) Vice-Chair
Former 3 to PhD, Co-Chair
Trillium Family Services, Board Member
PCC, Adjunct MSD
Former Crisis Response Team (CRT) Portland Police Bureau, Volunteer
Celebrant
503-449-1449

Without changing our patterns of thought, we will not be able to solve the problems we created with our current patterns of thought. —Albert Einstein

“Life is not a spectator sport....get in the game, play hard and seize every opportunity to be and share your best self”. kd

From: [Melanie Leilā Dudley](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 7:18:35 AM

TESTIMONY IN STRONG OPPOSITION TO THE FINAL EIS FOR PŌHAKULOA

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

My name is Leilā Dudley. I was born and raised in the ahupuaʻa of Pāpaʻikou on Hawaiʻi Island and have dedicated my life to ʻāina education and conservation. I write to you today with urgency and deep concern to strongly oppose the U.S. Army's Final Environmental Impact Statement (FEIS) for the proposed military retention of Pōhakuloa Training Area.

This document is not just inadequate—it is dangerous. It attempts to justify the continued desecration of 23,000 acres of our public trust lands with missing data, unanswered questions, and blatant disregard for Hawaiʻi's environmental laws. It acknowledges toxic contamination but offers no credible plan for cleanup. It ignores impacts to endangered species, cultural resources, and the health of the surrounding ecosystems and communities. It fails to assess alternative uses that could serve the public good. Even DLNR staff have documented the Army's pattern of refusing to engage in good faith.

The acceptance of this FEIS would be a betrayal of your mission to protect the land and resources of Hawaiʻi for present and future generations. This is not just about military training—this is about the future of our island's most vital resource: water.

Pōhakuloa sits atop one of the largest and most significant aquifers in all of Hawaiʻi. This aquifer nourishes ecosystems from mauna to makai, supports endangered species, and sustains human communities across Hawaiʻi Island. In the most isolated archipelago on Earth—where our freshwater supply is limited, finite, and sacred—this is a resource we cannot afford to gamble with.

As someone who has spent years restoring native forests, educating youth in Hawaiian lifeways, and grounding students and teachers in aloha ʻāina, I am outraged that such a place continues to be treated as expendable. Pōhakuloa is a wahi pana, a living piko, where ancient moʻolelo and modern science converge to affirm its central role in our island's well-being.

As a mother of three, I think every day about the world we are leaving to our children. How can I teach them to mālama ʻāina if our decision-makers continue to permit its destruction? To bomb this land is to bomb their future. I feel that truth even more deeply as a parent. What are we passing on to our keiki if we choose silence and complicity over protection and kuleana? I want my children to grow up in a Hawaiʻi where clean water runs beneath sacred lands, where we fight for the places that feed us, and where truth and accountability outweigh the power of military might. To accept this FEIS is to look the other way as our aquifers are poisoned, our laws are violated, and our kūpuna and keiki are dishonored.

I urge you—no, I demand that you reject this FEIS. Stand for ‘āina. Stand with your own staff. Stand with the people of Hawai‘i. Stand for our future generations. Hold the Army accountable and require a real, transparent process grounded in law, science, and community voice. Let future hearings be held on Hawai‘i Island, where the people most impacted can speak directly to you.

Ua lawa ka hewa. Enough is enough.

Me ka ‘ōia‘i‘o,

Leilā Dudley + Makahanaloa, Leialoha & Pi‘imauna Frazier

Program Coordinator, Pilina ‘Āina

M.S., Tropical Conservation Biology and Environmental Science

Mother, Educator, Cultural Practitioner, Aloha ‘Āina Advocate

From: [Nick Frazier](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 7:21:16 AM

TESTIMONY IN STRONG OPPOSITION TO THE FINAL EIS FOR PŌHAKULOA

Vice President, Makahanaloa Fishing Association

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

My name is Nick Frazier. I am a lifelong fisherman, a father, and the vice president of the Makahanaloa Fishing Association located in Hilo Palikū. I submit this testimony in firm opposition to the U.S. Army's Final Environmental Impact Statement (FEIS) for Pōhakuloa Training Area.

As someone who lives by and with the rhythms of the ocean, I understand how every drop of freshwater that feeds our streams and coastlines matters. Our wai comes from the mountains—filtered through forests, lava, and aquifers—and it nourishes our nearshore fisheries, our families, our ecosystems. Pōhakuloa sits on one of the largest aquifers in all of Hawai'i. Any threat to that water source is a threat to all of us: plants, animals, and people alike.

This FEIS, as submitted by the Army, is not just flawed—it is unacceptable. It fails to include key cultural and biological surveys, avoids serious consideration of alternative uses, and admits to contamination without offering a cleanup plan. This kind of negligence would never fly from a local fishing family, a farmer, or a small business owner—why should the military be held to a different standard?

The Army has had decades to clean up its mess. Instead, they come to you again with an incomplete document, hiding behind technical language, sidestepping accountability, and asking for a blank check to continue bombing sacred 'āina with no timeline, no end in sight.

We cannot keep poisoning the places that feed us. Hawai'i is the most isolated island chain in the world. Our freshwater, our food systems, our fisheries—everything we need to survive—depends on clean, functioning ecosystems. Pōhakuloa is not a wasteland. It is a wahi pana. It is living, and it deserves protection.

As a father and native Hawaiian, I think about what kind of island we're leaving behind for our keiki. We teach them to mālama i ka 'āina and mālama i ke kai—but what message are we sending if we allow the continued desecration of one of our most vital freshwater sources?

I urge the BLNR to reject this Final EIS. Uphold your responsibility to protect Hawai'i's land and water. Require full transparency, hold the Army accountable, and move future hearings

to Hawai'i Island so our communities can speak face to face.

We fish to feed our people. We protect water so it can protect us in return. Do not let this decision trade our future for more destruction.

Ua lawa. Enough already.

Me ka 'oia'i'o,

Nick Frazier

Vice President, Makahanaloa Fishing Association

Fisherman, Father, Cultural Practitioner, Aloha 'Āina advocate, Steward

From: [Carol Gaylord](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT THE ARMY'S EIS
Date: Thursday, May 8, 2025 7:36:21 AM

Why reject the EIS?

There has been NO adequate Environmental and Cultural Impact Analysis!

Pōhakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of our most endangered species.

The Army has burned nearly 20,000 acres, including designated critical habitat for native flora and fauna.

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

I am indigenous and i demand a rejection of the Army's EIS!

Mahalo-

Carol Gaylord
808-690-1178
536 Kaimake Loop
Kailua 96734

From: [Shannon Pōmaika'i Hennessey](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 7:31:17 AM

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

My name is Shannon Pōmaika'i Hennessey and I respectfully urge you to do the right thing, and REJECT the clearly insufficient FEIS in Item D-1.

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

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

Mahalo nui for the opportunity to testify.

Sincerely,

Shannon Pōmaika'i Hennessey
shanphennessey@gmail.com

From: [Brailey Hirose-Hulbert](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written Testimony Submission Brailey H.H. Testimony — Agenda Item D1: REJECT the US Army EIS of the Pōhakuloa Training Area
Date: Thursday, May 8, 2025 7:55:44 AM

aloha kākou;

to whom it may concern,

I am submitting this testimony to record my immense opposition to accepting the US Army's EIS of the Pōhakuloa Training Area. Reject the Us Army EIS of Pōhakuloa Train Area. Concurrently, I strongly oppose any further leasing of these lands to the US Army.

With urgency,
Brailey Hirose-Hulbert

From: [fred hofer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject EIS
Date: Thursday, May 8, 2025 7:33:37 AM

Aloha BLNR members,

I, Fred Hofer , am strongly opposed to any further bombing and desecration at Pohakuloa. We 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. It's a no brainer! 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 Trump's environmental budget cuts it appears protection of endangered species will be further trashed.
3. The military record of environmental contamination and failed cleanup in Hawaii is staggering. Tens of millions of live rounds from a wide variety of weapons systems have been fired from the lease lands firing points into the Federally seized (not owned) lands of the 51,000 acre impact area. The military didn't even pay 1 cent for the 84,000 acres of Hawaii crown and government lands seized by a Presidential executive order in 1964 under President Lyndon B. Johnson. Our organization has documented 57 present or former military sites on Hawaii island totaling more than 250,000 acres of military contamination. The present PTA commander LTC Timothy Alvarado has the gall to say " We (the military) are stewards of the land." Please list all the various weapon systems fired into the PTA impact area and the number of rounds fired over 80 plus years.
4. 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 does that tell you?
5. 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.
6. 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. See press release below of Oct. 1, 2023

An invitation to PTA Commander LTC Tim Alvarado to speak and answer questions at a public meeting

FOR PUBLIC RELEASE Oct. 1, 2023

Mailed to:

Pohakuloa Training Area (PTA) Commander

An invitation to PTA Commander LTC Tim Alvarado to speak and answer questions at a public meeting

FOR PUBLIC RELEASE Oct. 1, 2023

Mailed to:

Pohakuloa Training Area (PTA) Commander

LTC Tim Alvarado

PO Box 4607, Hilo HI 96720

also emailed to

Amy Phillips

PTA PAO to be delivered to LTC Alvarado

Phillips, Amy CIV USARMY USAG (USA) <amy.phillips.civ@army.mil>

Aloha LTC Alvarado,

Our organization hosts public community meetings on the 2nd and 4th Mondays of the month at the Kea'au Community Center from 6-8 PM.

We would like to invite you to come and make a presentation about PTA and respond to community concerns. Our proposed possible meeting dates for you are Monday Oct. 23rd or Nov. 13th. If neither of these dates are good for you please propose a better date (2nd and 4th Mondays of the Month).

Some community concerns expressed about PTA include the following:

1. What possible toxins are blowing in the dust, wind, and smoke off PTA from more than 75 years of bombing and shelling, including the use of Depleted Uranium (DU) radiation rounds at PTA? It has been suggested that an independent authority install air filters 360 degrees surrounding the base at government expense to see what might be coming off the base. What is your evaluation of PTA's lack of response to Hawaii County Council's resolution 639-08 passed in July 2008 by a vote of 8-1 calling on 8 actions to be taken by PTA. (Copy enclosed with letter sent to PO Box 4607, Hilo HI 96720)
2. There are growing concerns about spreading wildfires started at PTA from bombing and shelling. Is PTA, located in the dry, windy center of Hawaii Island, our "Lahaina" fire waiting to happen?
3. There are growing concerns, in light of Military Red Hill fuel contamination of the the aquifer on Oahu about toxins from PTA possibly contaminating the drinking water of Hawaii Island. Were military toxins found in the two water wells drilled at PTA 10 years ago? Were the water wells tested for a wide range of military toxins? Why aren't those wells being used by PTA instead of paying \$2 million yearly to haul water to PTA?
4. What are the military plans for clean up of all the Unexploded Ordnance (UXO) and other toxins on the entire 133,000- acres of PTA? I note that maps of PTA say "All of PTA should be considered a Dud Hazard Area."
5. It's been reported that less than half of PTA has been surveyed for cultural sites. Why the delay in doing cultural surveys for the entire base?
6. There are growing community concerns about not renewing or canceling the State lease of

23,000 acres for 65 years at a total cost of \$1 and the rescinding of the US presidential executive order in 1964 that seized 84,000 acres of Hawaiian crown and government lands indefinitely for zero costs.

7. What are the current number of live-rounds, and listing of all the various types of rounds, fired at PTA. Is it 15 million, 20 million, 25 million? The last figure I believe released about 20 years ago noted 14.8 million live rounds fired annually at PTA. What other rounds, besides live rounds, have been fired at PTA?

The above are just some of the concerns I have heard expressed in the community. There will no doubt be many others, but these are starters.

We will be grateful for your attendance and addressing these questions and others in a mutually respectful gathering. Mahalo.

Sincerely,
Jim Albertini, president of Malu 'Aina

cc: general public, elected officials, news media

10. On page 11 of the 32 pages of the DLNR staff executive summary Discussion, it states: The final EIS does not "fully declare the environmental implications of the proposed action," and that the Board has not been given the "full range of responsible opinion on environmental effects." It further states that this issue has been consistently raised since the first draft EIS.

I rest my case. Bombing and shelling desecrates cultural and historic sites at PTA. Polluting the air, land, and water with deadly toxins is Desecration. Make the military clean up its toxic mess and return the lands to the Hawaiian people.

Reject do not Accept the Pohakuloa Final EIS

Jim Albertini
5/6/25

This letter has been sent by Jim Albertini and his organization i freely quote it here in full &

I also used his testimony to testify myself as he explained and expressed much more clearly the facts and the concerns than I ever could

I urge you to reject that "EIS" , a pity fully inadequate instrument.

With all due respect;
Fred Hofer
Hilo
May 8, 2025

From: [Megan Ikemoto](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final EIS for Army Training Land Retention at Pōhakuloa (Agenda Item D1)
Date: Thursday, May 8, 2025 7:42:51 AM

Aloha,

I am writing to express my strong opposition to the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, listed as agenda item D1.

The Army is seeking renewal of a 65-year lease for a military training site on Hawai‘i Island, which is currently set to expire in August 2029. It is critical that the Board reject this Final EIS, as it is inadequate in addressing the profound 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. The EIS fails to fully recognize or mitigate the irreversible harm that continued military use would impose on this land.

The Army has not demonstrated the capacity or will to act as a proper steward of Pōhakuloa. Over decades, its presence has contributed to the degradation of this sacred landscape, and the potential long-term consequences extend beyond ecological damage. The health of our communities—those very people the military has sworn to protect—is also at risk. Contaminants and other environmental hazards associated with military training can have generational health impacts, lingering in the body and affecting future generations.

I respectfully urge the BLNR to reject the current Final EIS and deny the lease renewal. Our ‘āina, our cultural heritage, and the well-being of our people must come first.

Mahalo for your time and consideration.

Me ka ‘oia‘i‘o,
Megan Ikemoto

Hālau Kū Māna Public Charter School

--

Mahalo,

*Megan Ikemoto
M.Ed STEMS2
Student Services (6-12)
Ko Kula Kai Kumu*

"Asking for help isn't giving up. It's refusing to give up." - Charlie MacKesy

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From: [kelii ioane](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa lease extension
Date: Thursday, May 8, 2025 7:54:17 AM

My name is Kelii W. Ioane Jr. I am here to testify against a lease extension for the u.s. army at Pohakuloa. The u.s. military has shown a complete disregard for the 'aina and people of Hawaii. They left Kahoolawe in tatters, Waiakane Valley and the Kamaka ohana has been severely traumatized by the effects of the bombing there. The u.s. military has shown themselves to be a pollution nightmare in our fragile ecosystem. Stop the bombing.

[Sent from Yahoo Mail for iPad](#)

From: [penny kaae](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D1 FEIS Testimony
Date: Thursday, May 8, 2025 7:19:32 AM

Date: May 8 2025

Chairperson and Members
Board of Land and Natural Resources
Department of Land and Natural Resources
1151 Punchbowl Street, Room 130
Honolulu, Hawai'i 96813

RE: Opposition to Submittal D-1 – FEIS PTA Groundwater Impacts Associated with Pōhakuloa

Aloha Chair and Members of the Board,

I submit this letter in firm opposition to Submittal D-1, based on deep concern for the integrity of Hawai'i's groundwater-dependent ecosystems, and in alignment with the Public Trust Doctrine that governs water resources under the State Constitution and the mandates of the Commission on Water Resource Management (CWRM).

Though Pōhakuloa is located inland, the hydrological and ecological connectivity between its aquifers and nearshore springs is clear. Groundwater from the region feeds into coastal ecosystems that sustain critical biodiversity and support constitutionally protected Native Hawaiian traditional and customary practices. Species such as pālahalaha, 'ele'ele, 'ama'ama, and āholehole—all tied to Native subsistence, ceremony, and identity—depend on these groundwater-fed habitats.

As noted in the Division of Aquatic Resources' (DAR) comments, there remains significant uncertainty regarding the quality and quantity of groundwater beneath Pōhakuloa and how its degradation would impact these culturally and ecologically vital systems. Pursuant to the precautionary principle embedded within Hawai'i's Public Trust Doctrine, the State has an affirmative duty to refrain from actions that risk irreparable harm to public trust resources—particularly when scientific certainty is lacking.

Submittal D-1 fails to meet this standard. It lacks sufficient environmental review, does not adequately account for the interconnectedness of upland groundwater and coastal ecosystems, and does not reflect meaningful consultation with Native Hawaiian stakeholders. Under the Public Trust, the burden is on the proponent—not the public—to demonstrate that the proposed action will not harm trust resources. This threshold has not been met.

Accordingly, I respectfully urge the Board to reject Submittal D-1. No further action should be taken until:

- A comprehensive and culturally competent Environmental Impact Statement is completed;
- Best management practices for groundwater protection are updated and enforced;
- Meaningful beneficiary and community consultation is conducted; and
- The potential cumulative and long-term impacts to nearshore groundwater-dependent ecosystems are fully understood.

As trustees of Hawai'i's natural resources, the Board must act with the highest degree of caution and care. The health of our wai, our ecosystems, and our people are not expendable.

Mahalo for your attention and commitment to upholding your constitutional responsibilities.

Penny Kaae
Hui Aloha Puukapu Homestead Association

From: [Ku Kahakalau, Ph.D.](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's FEIS for Pōhakuloa
Date: Thursday, May 8, 2025 7:13:04 AM

Aloha Land Board Members:

Please accept this testimony expressing my and my family's strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and REJECT THE ARMY's EIS.

For native Hawaiian practitioners, like our 'ohana, Pōhakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites, beloved iwi kūpuna and some of Hawai'i's most endangered species. In our efforts to mālama this wahi pana, we initiated Makahiki ceremonies at Pōhakuloa in 2018, when Lt. Col. Loreto V. "JR" Borce Jr. was in command, to pray for peace and regeneration of this sacred area and we will not seize until the bombing of Pōhakuloa is stopped. Conducting these ceremonies at Pōhakuloa has allowed us to witness first hand the horrendous destruction of this beautiful 'āina by the US military, including thousands of acres of burned sites, unexploded ordinances and military trash left all over.

Clearly, since taking over this wahi pana, the Army has not demonstrated the capacity or the will to serve as a proper steward of this land. In addition, use of live-fire and bombing in the impact area continues to raise serious concerns about environmental contamination, safety, and long-term degradation of both the land and water.

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." Allowing ongoing military training activities at Pōhakuloa is simply not in line with preserving and maintaining these trust lands and their conservation district designation.

We urge you to reject the FEIS, which is insufficient for the following reasons:

- Inadequate Environmental and Cultural Impact Analysis
- Lack of a satisfactory plan to mitigate impacts to cultural and natural resources
- Unaddressed concerns about depleted uranium on the site

We implore the members of the land board to please respect our 'āina and Hawai'i's host

culture, and stand by your constitutional duty to mālama ‘āina, by rejecting the Army’s FEIS for Pōhakuloa. It’s time to return these lands to the people of Hawai‘i, so that healing and restoration can begin and Hawai‘i can advance in it’s efforts to become a trauma-informed state.

Me ka pono,

Kū Kahakalau, Ph.D. and ‘Ohana
Kukuihaele, Hawai‘i Island

--

Kū Kahakalau, Ph.D.
48-5525 Waipi‘o Valley Road
Honoka‘a, Hawai‘i 96727
(808) 775-0867
(808) 937-6854 (cell)

PŪPŪKAHI I HOLOMUA - UNITED WE WILL PROGRESS!

From: [Waylon Kaina](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Oppose Army's Environmental Impact Statement
Date: Thursday, May 8, 2025 7:12:47 AM

Aloha,

I am writing to testify against the further desecration and environmental impacts that the military/army has caused and will continue to do in Hawaii, especially for this cause at Pohakuloa. This is land that holds water that feeds Hawaii island and anything that it dumped, burned, or ammunition that depletes toxins into the watershed of the island is an absolute NO for me.

I am also opposing because what the U.S. military has done and continues to do to lands that are not theirs, is destroy it. Yet they have not put in any effort, which is their rightful duty is to clean up what they have done. Moreover, to want to renew the lease for further destruction to "our" lands is not pono.

It is a hard 'A'OLE, NO!

Mahalo.

Ka'imi Kaina

KA LĀHUI HAWAI‘I

Testimony of Ka Lāhui Hawai‘i

Before the Board of Land and Natural Resources

May 9, 2025 – Agenda Item D-1

RE: OPPOSITION to Acceptance of the Final Environmental Impact Statement (FEIS) for Army Training Land Retention at Pōhakuloa Training Area

Aloha Chair Chang and members of the Board,

Ka Lāhui Hawai‘i, a Native Hawaiian initiative for self-governance, submits this testimony in *strong opposition* to the acceptance of the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army for the proposed retention of 23,000 acres of public trust lands at Pōhakuloa on Hawai‘i Island.

We urge the BLNR to REJECT this FEIS for the following reasons:

1. Even the DLNR staff submittal highlights serious deficiencies.

The staff submittal does not recommend acceptance. Instead, it outlines two distinct options—one of which is to reject the FEIS on the basis that it "does not comply with applicable law and does not adequately disclose the environmental impacts of the proposed action." Additionally, multiple divisions within DLNR raised critical concerns (Exhibit A):

- The State Historic Preservation Division (SHPD) found the FEIS lacked sufficient wildfire mitigation for cultural sites, failed to guarantee access for Native Hawaiian lineal descendants, and did not survey large areas for archaeological resources.
- SHPD also called for formal communication protocols between the Army and SHPD, citing a history of delayed or inadequate reporting on impacts to cultural sites.

These concerns go to the heart of environmental compliance and confirm that the FEIS is incomplete, particularly for a site as ecologically sensitive and culturally significant as Pōhakuloa.

2. The FEIS is legally and scientifically insufficient.

Many of the serious concerns raised by community members during both public review periods were not addressed or resolved. The FEIS fails to adequately assess:

- Risks from depleted uranium and other unexploded ordnance;
- Ongoing environmental degradation from live-fire training and wildfires;
- The full cultural and cumulative health impacts to Hawai‘i Island communities;
- The incompatibility of military training with the land’s conservation district status.

KA LĀHUI HAWAI‘I

3. This land is part of the Public Land Trust.

In *Kahaulelio v. DLNR (2019)*, the Hawai‘i Supreme Court held that the State had violated its trust obligations by failing to monitor and protect these same lands. It emphasized that the State must proactively safeguard these lands—not wait for proof of harm. To accept this FEIS now, after already being found in breach, would be a failure of fiduciary duty.

4. The Army has paid only one dollar to desecrate these lands for decades.

The U.S. Army’s Pōhakuloa Training Area sits on stolen Hawaiian Kingdom government and crown lands, leased for just \$1 over 65 years. Renting 23,000 acres of sacred ‘āina for a dollar a year is not stewardship—it is a profound devaluation of our land and a violation of our kuleana. Much is owed to Kānaka Maoli who have borne the brunt of this destruction for generations. The State must not compound this historical injustice by approving a deficient environmental review today.

5. Pōhakuloa is part of a broader system of militarized exploitation.

The continued use of Pōhakuloa as a training ground is part of a broader U.S. military strategy that has devastated Indigenous lands across the Pacific—from Hawai‘i to Guåhan to the Marshall Islands. Using our ‘āina to prepare for war and occupation abroad makes us complicit in the ongoing displacement, destruction, and genocide of other Indigenous peoples. We refuse to allow our lands to be used as a launching pad for violence.

Ka Lāhui Hawai‘i calls on this Board to fulfill its constitutional trust responsibilities and reject this deeply flawed FEIS.

Stand with the lāhui. Stand for truth, for kuleana, and for the protection of our ‘āina. There is still time to make things right.

No lease. Stop the desecration. Land Back.

Me ka ‘ōia‘i‘o,
Ka Lāhui Hawai‘i

From: [Ana-Melissa Kea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Written Testimony
Date: Thursday, May 8, 2025 7:18:07 AM

Aloha,

As a Native Hawaiian, soon-to-be mother, and citizen, I strongly oppose Agenda Item D-1. The FEIS would lock in another 65 years of environmental and cultural damage, which is in direct conflict with State's Constitutional responsibility to mālama 'āina.

Please do not let that happen.

Mahalo for your consideration.

Mahalo piha,

Ana-Melissa Kawehionālani Kea-Scott

From: [Alyssa Marcos](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony re: Pōhakuloa
Date: Thursday, May 8, 2025 7:21:32 AM

To Whom It May Concern:

I am writing to formally express my strong opposition to the U.S. Army's Environmental Impact Statement (EIS) for continued military use of lands at Pōhakuloa. The proposed actions are incompatible with the responsibilities we share to care for Hawai'i's natural, cultural, and community resources. The EIS fails on multiple fronts and does not justify further military occupation or use of these lands.

1. Incompatibility with Conservation District Designation

Pōhakuloa sits within a state-designated Conservation District—land that is meant to be preserved for its natural, cultural, and ecological value. Military training activities, including the use of live munitions, off-road vehicles, and other disruptive operations, are fundamentally incompatible with the goals and legal framework of conservation land use. Continued use under these conditions violates both the spirit and the letter of Hawai'i's land use protections.

2. Lacking Protection of Endangered Species

Despite decades of occupation, the Army has not demonstrated adequate stewardship or commitment to protecting endangered flora and fauna native to the area. The EIS provides no credible assurance that future training activities will prevent further degradation of habitat or prevent harm to already vulnerable species. Conservation cannot be a side note—it must be the foundation of any decision involving these lands.

3. Failure to Remediate Contamination

The Army has repeatedly failed to clean up contamination caused by its own activities, including unexploded ordnance, heavy metals, and other pollutants. This negligence poses significant risks to ecosystems, cultural practitioners, and future generations. Until comprehensive cleanup has been completed and verified by independent bodies, the Army should not be granted continued access.

4. Cultural and Archaeological Disregard

The EIS fails to adequately address or respect the many cultural and archaeological sites present at Pōhakuloa. These sites are not just historic artifacts—they are living parts of Hawai'i's identity and spiritual landscape. The Army's superficial assessments and mitigations reflect a broader pattern of disregard for Native Hawaiian rights and traditions.

5. Fire Risk and Environmental Hazards

The use of live fire and other military activities has increased the risk of wildfires, which have already devastated large swaths of land and endangered nearby communities. The EIS offers insufficient planning or accountability mechanisms to mitigate this risk or to respond effectively to fire outbreaks.

6. Community Input Ignored

Community opposition to continued military use has been clear and consistent. Yet, the Army's EIS process appears to marginalize public testimony and concerns, reducing them to

procedural checkboxes rather than incorporating them meaningfully into the planning process. This is an affront to democratic process and local self-determination.

7. Threats to Water Aquifers and Long-Term Sustainability

Finally, the EIS fails to guarantee long-term protection of critical water sources and aquifers beneath and around the Pōhakuloa Training Area. Contamination of these resources would have irreversible consequences for the health, agriculture, and sovereignty of the surrounding communities.

In summary, the Army's Environmental Impact Statement does not sufficiently justify continued military occupation of Pōhakuloa. The risks to our conservation lands, endangered species, cultural heritage, and vital resources far outweigh any perceived benefits. I urge decision-makers to reject this EIS and to begin a process of demilitarization, cleanup, and return of the land to its rightful stewards.

Me ka 'oia'i'o,

Kahaku Marcos

From: [Janessa Maxilom](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa! Reject Final EIS from the U.S. Military
Date: Thursday, May 8, 2025 7:13:14 AM

Ua Mau Ke Ea O Ka ‘Aina I Ka Pono

Aloha mai kākou,

I submit this testimony not only as a concerned citizen, but as a Kanaka Maoli who carries the kuleana of ancestral responsibility and the enduring connection to our ‘āina within me. I write with profound grief and deep aloha for Pōhakuloa—a sacred and storied landscape that has nourished our people for generations and now suffers under the ongoing strain of military occupation and environmental degradation.

This issue extends far beyond questions of land use or policy compliance. It strikes at the core of our identity, our history, and our collective right as Kānaka Maoli to maintain a living relationship with our ancestral lands. The Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area represents a critical failure—both in its inability to account for the cultural and spiritual significance of this ‘āina, and in its disregard for the lasting damage caused by decades of bombing, live-fire exercises, and toxic contamination.

Contrary to how it has been portrayed in the EIS, Pōhakuloa is not "vacant land." It is a living landscape, imbued with the presence of our kūpuna, inhabited by endangered native species, and home to sacred cultural sites that ground our mo‘okū‘auhau (genealogy) and sustain our sense of place. The concept of *aloha ‘āina* is not abstract; it is an active practice of love, responsibility, and protection. When the land is harmed, our people are harmed.

The EIS fails to acknowledge this fundamental truth. It downplays cultural and ecological impacts, disregards generations of community testimony, and proposes superficial “mitigations” that do not come close to addressing the scope of the injustice. Environmental monitoring and limited access do not amount to restoration or reconciliation. The continued militarization of Pōhakuloa constitutes a direct violation of our rights and perpetuates the systemic erasure of our culture.

As we envision a just future, it is essential to center *EAducation*—an education grounded in ‘ike kūpuna (ancestral knowledge), cultural practice, and aloha ‘āina. Our keiki deserve more than the remnants of a bombed-out landscape. They deserve to inherit an ‘āina that is thriving, to learn the names of its winds and rains, to walk its trails, and to hear the stories embedded in its stones. *EAducation* ensures that our history is not only preserved, but lived. It cultivates generations of stewards who understand that caring for the land is inseparable from caring for our people.

For these reasons, I Janessa Noelani Maxilom, strongly urge the rejection of the Final Environmental Impact Statement for the Pōhakuloa Training Area. I further call for the return of Pōhakuloa to its rightful stewards—the Hawaiian people—and for a genuine, sustained process of consultation with Native Hawaiian cultural practitioners, kūpuna, and community leaders. The health of our ‘āina, the integrity of our culture, and the future of our lāhui depend on it.

Mālama,
Janessa Noelani Maxilom

From: [James Maioho](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [James Maioho](#)
Subject: [EXTERNAL] May 9th BLNR Testimony
Date: Thursday, May 8, 2025 7:41:41 AM

One need look **NO FURTHER** than the Executive Summary to see that there has **NOT** been an adequate study done. This to me is evidenced by the legal argument laid out by the military to avoid having to reveal the most impactful actions that are really outside of it's proper scope and purpose. The military leases, especially at the historical lease rate of \$1.00 should be allowed to expire and the land cleared and returned to safety at the expense of US Military.

Throughout the EIS process, Staff had and continues to have concerns with the following:

1. That the contents of the draft/final EIS do not fully declare the environmental implications of the proposed action and does not discuss all reasonably foreseeable consequences; and
2. The data and analysis do not commensurate with the importance of the impacts.

Staff's main concerns are as follows:

1. 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. USAG-HI has stated that under the *"Under the No Action Alternative ...the Army would have no land access to the impact area...which would cease or severely limit Army activities in those areas."* According to the State Historic Preservation Division (SHPD) and numerous commenters on the draft EISs, the impact zone is home to numerous historic and cultural properties, including 'iwi kupuna. USAG-HI also states that the 2018 Section 106 Programmatic Agreement for PTA determined that *"previously military training and related activities have had adverse impacts on historic properties at PTA, primarily within the impact area."* Thus, by USAG-HI retaining the State lands through a long-term land disposition, any impacts to the impact area are expected to continue.

Refer to Volume I, Section 3.4, page 3-71 or page 179 of the electronic file for USAG-HI's discussion on Historic and Cultural Resources and Cultural Practices.

2. Staff and SHPD have concerns that the inventory of

archaeological sites is incomplete. It became recently known to the Department that a number of artifacts were taken from State lands into USAG-HI possession and that USAG-HI believes NAGPRA to be the controlling authority. The Department disagrees as historic properties located on State lands are the property of the State and by

allowing NAGPRA to prevail, the Department would no longer have rights as HRS, Chapter 6E would no longer be the controlling authority.

3. Lack of current studies and/or robust summaries to provide data and analysis regarding endangered biological resources. Most concerning is that USAG-HI is proposing to conduct studies after the EIS is completed (a 2025 Programmatic Biological Opinion (BO) and an invertebrate survey) when those studies should have been done beforehand in order to provide the most current information in the EIS document. Further the 2025 BO is anticipated to include two species, the anthracinan yellow-faced bee and the Blackburn's sphinx moth that Staff had previously noted was lacking data and analysis to determine impacts.

Refer to Volume I, Section 3.3, page 3-27 or page 135 of the electronic file for USAG-HI's discussion on Biological Resources.

4. That military use is neither consistent with the overall objective nor the allowable uses in the Conservation District and that a rule amendment to allow such use may not be a likely scenario. USAG-HI did not include any other alternatives in which they could comply with the Conservation District, i.e. applying for a Land Use District Boundary Amendment to move PTA out of the Conservation District into a more appropriate district designation that would allow for military use.

Refer to Volume I, Section 5.3.2, page 5-16 or page 482 of the electronic file for USAG-HI's discussion on the consistency of their proposed action with the Conservation District.

Military abuse and use of these lands should be ended at the first legally possible point. Under NO circumstances should this be renewed. The DLNR has failed in many of it's efforts to protect our IWI Kupuna and this downward trend MUST, Must be reversed!

I would also like to testify in person.

Best Regards,

Ho'ilina Strategies

James J. Maioho

808-459-1313

From: [Leimana Spencer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Thursday, May 8, 2025 7:27:22 AM

Aloha Chair and Members,

My name is Rogers Naihe. I was born and raised on Hawai‘i Island, and I am a cultural practitioner who honors our kūpuna and sacred ‘āina through protocol, chant, and ceremony. I strongly oppose Agenda Item D-1.

Pōhakuloa is a sacred and living place, not a military training ground. The Army’s FEIS is incomplete, lacking cultural consultation, surveys for iwi kūpuna, and basic respect for Hawaiian knowledge and law. This document does not meet legal or spiritual standards.

I urge you to fulfill your kuleana and reject this unlawful FEIS. Let Pōhakuloa begin to heal.

Mahalo nui,
Rogers Naihe

From: [Skye Narvaez](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] BLNR Testimony: Final EIS Pōhakuloa (agenda item D1)
Date: Thursday, May 8, 2025 7:36:00 AM

Testimony to the Board of Land and Natural Resources

REJECT Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area (agenda item D1)

May 8, 2025

Aloha,

My name is Skye Narvaez and I am a Native Hawaiian who was raised on this moku and who has the most respect and aloha for this ‘āina and the kuleana to mālama ‘āina.

I am writing to urge the Board to reject the EIS for failing to address the environmental, cultural, and socio-economic impacts on this wahi pana.

Pōhakuloa is a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of our most endangered species. The Army has burned nearly 20,000 acres, including designated critical habitat for native flora and fauna and they have failed to provide a sufficient plan for mitigating these environmental and cultural impacts.

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

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

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

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

As an overview, I am urging BLNR to reject the final EIS on these grounds :

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

Mahalo for your time,

Skye Narvaez

1560 Kikaha St.

Hilo, HI 96720

(808) 896-1022

the3littlems@gmail.com

From: [Nenehiwahiwa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject or Require Revision of Army Pohakuloa EIS
Date: Thursday, May 8, 2025 7:46:08 AM

Aloha

The costs of the Army's training at Pōhakuloa are not worth the impacts they have on our aina - our environment and our culture - and their omission of sacred objects from the EIS (<https://www.hawaiinewsnow.com/2025/05/08/army-answers-why-discovery-significant-burial-objects-not-included-pohakuloa-eis/>) is evidence that they have not considered the impacts of their training in the way our people would.

I urge you to Reject or Require Revision of Army's Environmental Impact Statement.

Thank you

From: [Steffany Wong Pacheco](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's EIS on Pōhakuloa
Date: Thursday, May 8, 2025 7:18:02 AM

To whom it may concern,

I strongly urge you to reject the Army's EIS on Pōhakuloa and request a new EIS to be completed with multiple stakeholders outside the Army to be consulted.

The army's current EIS does not adequately discuss or provide solutions for the negative effects it has had on cultural and natural resources. Army usage also does not align with Pōhakuloa's conservation designation and put community's commitment to mālama 'aina.

Concerns around the presence of depleted uranium on the site have also gone unaddressed. It is necessary for the Army to communicate a plan to mitigate and remedy this in their EIS.

Again, I urge you to reject the Army's EIS and request a new EIS to be completed with multiple stakeholders outside of the Army to be consulted.

Mahalo,
Steffany Pacheco
Waiau, O'ahu o Kākuhihewa

From: [Shaw Pascua](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 7:47:08 AM

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

Date: May 8, 2025

Aloha Chair Chang and Members of the Board,

My name is Shaw Pascua, 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,

Shaw Pascua

Waipahu, O'ahu
Hui Aloha Aina o Honolulu

From: [Vance Patao](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] I Oppose Agenda item D1
Date: Thursday, May 8, 2025 7:23:14 AM

I am a concerned resident of Hawai'i Island, and I oppose Agenda Item D-1. This FEIS lacks critical cultural and environmental reviews and must be rejected.

From: [Nā 'Ōiwi NYC Maoli](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final EIS for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 7:53:39 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli and steward of this 'āina to strongly 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.

Aloha 'Āina!

Me ka 'ōia'i'o,
Kaina Quenga
Hilo, Hawai'i
Kanaka Maoli / Cultural Practitioner
646 522 7707

From: [Alejandra](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area
Date: Thursday, May 8, 2025 7:09:15 AM

May 8, 2025

Aloha Chair Chang and Members of the Board,

My name is **Alejandra Rivas**, 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. I would also like to add that at least 3 generations of Ali'i have worshiped at heiau built by 'Umi-a-Līloa in Pōhakuloa. The destruction of these sacred cultural sites is devastating beyond comprehension.

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,

Alejandra Rivas

Honolulu, O'ahu

Hui Aloha 'Āina o Honolulu

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

Subject: Opposition to the U.S. Army's Final Environmental Impact Statement (FEIS) for Pōhakuloa Training Area

Aloha e nā luna o ka BLNR,

My name is Keilani Rose, and I submit this testimony in firm opposition to the U.S. Army's Final Environmental Impact Statement (FEIS) concerning the Pōhakuloa Training Area (PTA). I urge the BLNR to reject the Army's proposal based on the following points:

1. Pōhakuloa is Hawaiian Land.

Pōhakuloa resides on Hawaiian lands. The Hawai'i State Constitution mandates that all public natural resources are held in trust by the State for the benefit of its people. As articulated in Article XI, Section 1, the State must conserve and protect Hawai'i's natural beauty and all natural resources, and promote their development and utilization in a manner consistent with their conservation.

2. Utilizing Hawaiian Land for U.S. Military Activities Constitutes Desecration.

The continued use of Pōhakuloa for military training, including live-fire exercises, has led to significant environmental degradation. Notably, the Army has acknowledged the presence of contamination, including the use of depleted uranium munitions in the 1960s.

3. The U.S. Army Has Caused Irreparable Harm to Our Lands and Waters Without Adequate Remediation Plans.

The Army's activities have resulted in widespread contamination and environmental damage. Despite acknowledging these impacts, there is a lack of comprehensive plans for cleanup or remediation, raising concerns about the long-term health of the ecosystem and public safety.

4. The Army Does Not Require Pōhakuloa for Training.

Historical precedents, such as the return of Kaho'olawe and Mākua Valley, demonstrate that the military can and has operated without these lands. The use of Pōhakuloa for training purposes is wasteful, unnecessary violation, especially given the environmental and cultural costs.

5. Hawai'i Has Not Consented to Being a Military Base in the Pacific.

The use of Hawaiian lands for military purposes has too often proceeded without the explicit consent of the Native Hawaiian people. This lack of consent underscores the obligation to reevaluate and rectify historical injustices.

Reasons for BLNR to Reject the Army's FEIS:

1. Admission of Widespread Contamination Without Adequate Assessment or Cleanup Plans.

The Army's FEIS acknowledges environmental contamination but fails to provide a thorough assessment or concrete plans for remediation, violating the State's duty to protect natural resources.

2. Inability to Prove Contamination Has Not Affected Water or Ecosystems.

There is insufficient evidence to ensure that contaminants have not leached into water sources or adversely affected ecosystems, posing potential risks to public health and biodiversity.

3. Lack of Transparency Regarding Safety Procedures and Environmental Data.

The Army has been criticized for not sharing safety protocols or spill data and for deleting critical information, hindering public oversight and accountability.

4. Dismissal of Fire Risks, Endangered Species, and Climate Harms Without Substantial Evidence.

The FEIS inadequately addresses the risks of wildfires, threats to endangered species, and climate change impacts, lacking comprehensive analysis and mitigation strategies.

5. Evasion of Hawai'i Law by Ignoring Cumulative Environmental Impacts.

The FEIS fails to consider and be transparent regarding the cumulative impacts of military activities, contravening Hawai'i's environmental laws that require such assessments to protect public trust resources.

BLNR's Authority and Duty:

The BLNR has both the authority and the **constitutional duty** to reject the Army's FEIS. The Hawai'i Supreme Court has emphasized the State's obligation to uphold the public trust doctrine, ensuring the protection and preservation of natural resources for current and future generations.

Conclusion:

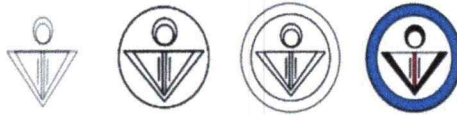
Given the substantial environmental degradation, lack of remediation plans, and legal obligations under the public trust doctrine, I urge the BLNR to reject the U.S. Army's Final Environmental Impact Statement for Pōhakuloa. Upholding your duty to protect Hawai'i's natural and cultural resources is paramount.

Me ka ha'aha'a (with humility),

Keilani Rose

Kanaka Maoli

May 8, 2025



Ko'i'ula

BLNR

Date: 5/7/25

Testimony for Agenda Item D-1

REJECT the FEIS for Agenda Item D-1

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

We are Ko'i'ula, an active NHO on Maui. Our mission is to perpetuate, preserve, and steward all natural and cultural resources and to protect and conserve the `āina.

We respectfully urge you to do the right thing and reject the insufficient FEIS in Item D-1.

This FEIS disregards clear Hawai'i law, as even DLNR staff repeatedly point out in the staff submission. The Army must 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 proper objective assessment can be made about the impacts of proposed military "retention" of `āina in Pōhakuloa.

Please uphold the law.

Mahalo for your support.


Ko'i'ula Treasurer

From: [Leiana Sing-Kahalehau](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] DON'T renew lease to Army for POHAKULOA
Date: Thursday, May 8, 2025 7:22:40 AM

ALOHA AINA,
Stop BOMBING OUR AINA

As a kanaka
I speak for my KUPUNA that have passed! my 'Ohana, ku'u keiki & ku'u mo'opuna!

Our aina is not for BOMBING, take it to the continental USA and go bomb there!!!!

Do NOT RENEW THEIR LEASE at POKAKULOA OR ANY MILITARY BASES IN HAWAII and make them
clean up what mess they made!

POHAKULOA (HAWAII) they don't even use the water there! They bring in water by truck. How safe is it for all
of us all?

KAHO'OLawe IS STILL A MESS!
(MAUI COUNTY)

PAUKUKALO (MAUI)

RED HILL water is still not safe! (OAHU)

STOP ALL HAWAI'I LAND LEASE TO OUTSIDERS. We are not American! We are ok Hawai'i pai aina!
Kingdom of Hawai'i!

GOD IS NOT HAPPY WITH ALL THE WRONG DOINGS

From: [Sonny Sing-Kahalehau](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] STOP THE BOMBING
Date: Thursday, May 8, 2025 7:32:32 AM

I testify to NOT renew the army military lease of Pōhakuloa

From: [William Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] We Demand BLNR to Reject the U.S. Army's Pohakuloa FEIS
Date: Thursday, May 8, 2025 7:37:31 AM

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

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

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

Key issues that warrant immediate rejection include:

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

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

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

Sincerely,
William Smith
Puna, Hawai‘i
Mountain View elementary school

From: [Harley Souza](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Thursday, May 8, 2025 7:51:10 AM

To whom it may concern,

Please reject the Army's final environmental impact statement. He ali'i ka 'āina, he kauwā ke kānaka.

Mahalo nui!
Harley Souza

From: [Leimana Spencer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Thursday, May 8, 2025 7:26:17 AM

Aloha Chair and Members,

My name is Leimana Spencer. I was born and raised on Hawai‘i Island, and I am a cultural practitioner who honors our kūpuna and sacred ‘āina through protocol, chant, and ceremony. I strongly oppose Agenda Item D-1.

Pōhakuloa is a sacred and living place, not a military training ground. The Army’s FEIS is incomplete, lacking cultural consultation, surveys for iwi kūpuna, and basic respect for Hawaiian knowledge and law. This document does not meet legal or spiritual standards.

I urge you to fulfill your kuleana and reject this unlawful FEIS. Let Pōhakuloa begin to heal.

Mahalo nui,
Leimana Spencer

Sent from my iPhone

From: [Chase Strickland](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Thursday, May 8, 2025 7:28:01 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka 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,
Chase M Strickland
Ewa Beach, 'Oahu
808-780-7285

From: [Anahera M.T](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Thursday, May 8, 2025 7:40:42 AM

Aloha mai kākou,

My name is Anehera Tevaga. I am a student at Kamehameha Schools and a cultural practitioner who was raised to honor and protect our ‘āina. I stand in strong opposition to Agenda Item D-1 and the Army’s Final Environmental Impact Statement (FEIS) for the continued use of Pōhakuloa.

As a young Hawaiian, I’ve learned that our lands are sacred—that they carry the mana of our kūpuna and the responsibility of our future. Pōhakuloa is not just a place; it is a living part of our identity, our stories, and our culture. The Army’s FEIS shows no respect for this. There were no proper surveys, no cultural consultation, and no accountability for decades of bombing and harm.

I represent the next generation, and I am asking you to listen. If we don’t protect places like Pōhakuloa now, what will we have left to pass down? Please fulfill your kuleana and reject this FEIS. Let Pōhakuloa heal—for our people, and for the future of Hawai‘i.

Mahalo nui,
Anehera Tevaga
Kamehameha Schools student
Cultural Practitioner

From: [Chris Thomason](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Aole Pohakuloa, Save Hawaii, Return Our Rights, Save Our Water
Date: Thursday, May 8, 2025 7:51:51 AM

I and my organizations are strongly against this EIS passing.

It mentions nothing about the bones and burials Pohakuloa constantly discovers and disturbs. The US Constitution 1st Amendment guarantees religious freedom yet You bomb my goddess every day. This is like us sending missiles to Saturn for all You secret satanists, or us literally putting Jesus on the cross for all You supposed Christians. THIS IS MY CROSS AND YOU MURDER MY JESUS EVERY DAY!!~!

Finally and most important is FRESH WATER, our most precious resource on Earth and also here on Moku o Hawaii. Soon we will not be able to drink our own water and your European masters and Dark Occult will have total control over us here on the most sacred land mass ever. Right now we have millions of year of fresh water for millions of people. Soon we will have not a drop drinkable. Uranium is one thing but the Theramite and other explosive ordinances knowingly drain down into the aquafer every day by your hands and sinister plans. We who live here will drink it all and be sick from it. IS THIS YOUR PLAN!? YOU ARE KILLING US ALL and removing all hope for our future progeny here on Hawaii by completely destroying the most important fresh water source on Earth.

Shameful destruction of the sacred and most precious there is MUST STOP.

PLEASE I BEG OF YOU TO BE REASONABLE and KIND and BE the SPIRIT OF ALOHA, not the means of it's destruction. AUWE! AUWE!!

In Love, Christopher Thomason o Kalaoa Kona Hawaii Nei
Kona Koa is OPPOSED

73-1026 Ahulani St
96740
HAWAIIAN KINGDOM

"Strange is our situation here upon earth. Each of us comes for a short visit, not knowing why, yet sometimes seeming to a divine purpose. From the standpoint of daily life, however, there is one thing we do know: That we are here for the sake of others ... for the countless unknown souls with whose fate we are connected by a bond of sympathy. Many times a day, I realize how much my outer and inner life is built upon the labors of people, both living and dead, and how earnestly I must exert myself in order to give in return as much as I have received." - Albert Einstein

From: [Crystal Thornburg-Homcy](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] vote no on Agenda Item D-1
Date: Thursday, May 8, 2025 7:34:13 AM

As someone who values Hawaiian culture and environmental stewardship, I am deeply concerned. The FEIS does not meet legal standards and ignores cultural impacts. Please vote no on Agenda Item D-1.

Mahalo,
Crystal

Crystal Thornburg-Homcy
P.O. Box 606
Haleiwa Hawaii
96712
USA

https://urldefense.com/v3/_http://www.beyondthesurfacefilm.com_!!LIYSdFfckKA!2zhDMPBXJ0MRoi5dFRrT2QJ-BppYJdGGAIVYeDgRcB_KZkVVVoQ30Dt4MoslLuZ8CfrXC4LunnYz6AOfGAEnY9irHZqjLS

From: [Mariko Whitenack](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 7:18:52 AM

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

My name is Mariko Whitenack and I respectfully urge you to do the right thing by REJECTING 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.

Not only will this harm the public interest, but in particular, 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.

Furthermore, by accepting such a shoddy FEIS, the BLNR will set a dangerous precedent, making 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.

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

Mahalo nui for the opportunity to testify.

Me ke aloha,
Mariko Whitenack

From: [Kanani Wylie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Thursday, May 8, 2025 7:19:01 AM

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,

Kanani Wylie

Hawaii Island

From: [Kait Young](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony opposing final EIS for pohakuloa training area
Date: Thursday, May 8, 2025 7:29:41 AM

Aloha Members of the Board of Land and Natural Resources,

My name is Kaitlyn Young, 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,
Kaitlyn Young, Pahoā, Hawaii