

**From:** [Kahealani Kawamoto](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony : Opposition to US Army - Kāko'o Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:47:12 AM  
**Attachments:** [Testimony\\_Opposed to US Army proposal for Pōhakuloa.docx](#)

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Aloha mai kākou,

I write this to you today to voice my unwavering opposition to the U.S. Army's proposal to retain the leased lands at Pōhakuloa. This wahi pana is not merely a parcel of land; it is a sacred site, a living testament to our ancestors, and a vital part of our cultural and environmental heritage. The prolonged desecration of this land has inflicted irreparable harm, and it is imperative that we take a stand to protect it for future generations.

Pōhakuloa is deeply intertwined with Hawaiian spirituality and cultural practices. It is considered a place set apart, a realm for elemental spirits rather than human habitation. The land is dotted with caves and lava tubes, serving as the resting place for countless iwi kūpuna. The very piko (center) of the island lies on Pōhakuloa's eastern border, underscoring its profound spiritual importance. Over the past six decades, military activities at Pōhakuloa have caused extensive environmental damage. The area has been subjected to nearly 900 wildfires since 1975, many ignited by live-fire training exercises. These fires have devastated native vegetation, including endangered species such as the palila, a honeycreeper, and the 'ōpe'ape'a.

The use of depleted uranium (DU) munitions during the 1960s has left a legacy of radioactive contamination in the soil. The Army's own Environmental Impact Statement acknowledges the presence of DU, raising concerns about potential health risks to both wildlife and future generations. Additionally, the Army's activities have led to the creation of numerous dump sites within the Conservation District, contradicting the very purpose of this land designation, which is to conserve, protect, and preserve important cultural and natural resources. The State of Hawai'i has a constitutional duty to protect Native Hawaiian rights and interests. Article XII, Section 7 of the Hawai'i State Constitution reaffirms and shall protect all rights customarily and traditionally exercised for subsistence, cultural, and religious purposes by Native Hawaiians. The continued military use of Pōhakuloa undermines these rights and the state's obligation to mālama 'āina (care for the land).

It is time to end the desecration of Pōhakuloa. The land has endured enough. The U.S. The Army's activities have inflicted lasting damage on our cultural heritage, our environment, and our community. We must not allow this sacred place to continue to be used as a site for military exercises. I urge the Board of Land and Natural Resources to reject the Army's proposal to retain the leased lands at Pōhakuloa. Let us honor our ancestors by protecting this wahi pana and ensuring that it remains a place of reverence and restoration for generations to come.

Mahalo for your time and consideration,

Alyssah Kahealani Lehua Kawamoto  
Pu‘ukapu, Hawai‘i

**Supporting Documents and References:**

- Ka Wai Ola: The Army and Pōhakuloa [Ka Wai Ola](#)
- Ka Wai Ola: Army Impacts on Hawaiian Trust Lands Examined at Pōhakuloa and on O‘ahu [Ka Wai Ola](#)
- Honolulu Civil Beat: Hawaii Agencies Criticize A Big Island Military Training Site Amid Push for Lease Renewal [Honolulu Civil Beat](#)
- Hawai‘i State Constitution, Article XII, Section 7 [Hawaii State Legislature](#)

**From:** [Rodger Hansen](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Opposition to Final Environmental Impact Statement (FEIS) for Military Lease Renewal at Pōhakuloa.  
**Date:** Thursday, May 8, 2025 11:01:18 AM

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Aloha DLNR board members,

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

I strongly urge you to vote NO on Agenda Item D-1 and reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army for the continued military use of Pōhakuloa.

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

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

Mahalo for your consideration,  
Rodger Hansen  
Hakalau HI 96710

**From:** [Genesis Avina](#)  
**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 9:49:00 AM

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

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

1. Continued Desecration of Sacred Sites

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

2. Environmental Irreversibility

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

3. Illegitimacy of U.S. Military Occupation

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

4. Failure to Uphold the Public Trust Doctrine

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

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



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

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

Me ka 'oia'i'o,  
Genesis Avina  
Honolulu, Oahu  
(626) 532-5713

**From:** [Rexie Ah Chong](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Deny lease renewal at Pohakuloa  
**Date:** Thursday, May 8, 2025 9:51:55 AM

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Aloha,

There is nothing natural about what is occurring and has occurred for too long in Pohakuloa. There is the argument of cultural ignorance and misuse of land by the U.S. Army, but there is too the argument of causing safety issues with chances of wildfires or polluting the environment for inaccessibility of the future generations. There is also the argument of how much land is devalued by the Army at the extremely low price for its lease - this pilina or connection between the Army and the land, our home, is toxic in many ways.

The BLNR has the privilege of ensuring our land and natural resources are well managed & preserved for our future. Do you want your grandchildren to grow up accustomed to the echoes and trembling of bombs heavily dropping on the ground or the sound of bullets rambling in the distance while we endure them that they're safe? This is not preservation.

Please do not renew the ARMY's lease at Pohakuloa. Already, waiting until it ends 4 years from now is devastating to the land and natural resources. Please use your power with aloha aina in your minds & hearts.

Malama Pono,  
Rexie Ah Chong

**From:** [Maka Gibson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 9:55:31 AM

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

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

I visited Hawai'i Island in both February and March and drove by Pōhakuloa multiple times and it broke my heart to see our 'Āina used and abused that way by the U.S. Army. It is a wahi pana and is so closely tied to Mauna Kea, so it is so pilau that the Army to come into our home and disrespect our 'Āina.

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,  
Maka Gibson

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**Maka Gibson**  
pronouns: she | her | hers  
808.291.2034

**Ua ola loko i ke aloha.**  
Love gives life within.

**From:** [Kale Kanaeholo](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 9:52:44 AM

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

‘O wau ‘o Kale Kanaeholo and I respectfully urge you to do the right thing, and **reject** the clearly insufficient FEIS in Item D-1.

Kānaka Maoli 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.

Me ka ha‘aha‘a,  
Kale Kanaeholo

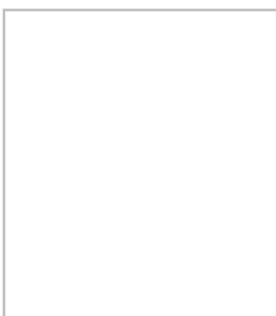
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"He makemake ko‘u e pololei ka moolelo o ko‘u one hanau, aole na ka malihini e ao ia‘u i ka moolelo o ko‘u lahui, na‘u e ao aku i ka moolelo i ka malihini." -S. M. Kamakau, *Ke Au Okoa* 16 Okatoba 1865 ([Buke 1, Helu 26](#))

*I want the history of my homeland to be correct. The foreigner shall not teach me the history of my people, I shall teach the foreigner.*

**Kale Kanaeholo, M.A.**

Graduate Assistant, History | Ph.D. Candidate, History  
President, Phi Alpha Theta (Alpha Beta Epsilon)  
Ke Kulanui o Hawai‘i ma Mānoa



2530 Dole Street  
Sakamaki Hall B406  
Honolulu, Hawai'i 96822

**Email:** [kalek8@hawaii.edu](mailto:kalek8@hawaii.edu) | [Department Profile](#)

**From:** [Melemac](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pls Reject Army's EIS for Pohakuloa  
**Date:** Thursday, May 8, 2025 9:48:23 AM

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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,  
Mele McPherson  
Kawaihae, Hawaii

**From:** [Jo Mendoza](#)  
**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 9:59:11 AM

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Aloha Members of the Board of Land and Natural Resources,

My name is Iris Mendoza, and I am writing to strongly oppose the approval of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed extension of the U.S. Army's lease.

Pōhakuloa is not just a conservation district—it is a wahi pana, a sacred and historically rich area that contains one of the few remaining sub-alpine tropical dryland ecosystems in the world. This land holds immense cultural and spiritual importance for Kānaka ʻŌiwi. For more than sixty years, the military has caused significant harm to this area—through bombings, contamination from depleted uranium, repeated wildfires, and failure to uphold the terms of the original \$1 lease from 1964.

The Final EIS fails to present an honest or complete picture. It downplays the long-term environmental and cultural damage and ignores decades of community resistance. It assumes compliance going forward without addressing the military's track record of neglect and past violations of state law and local resolutions—such as the 2008 call to stop live-fire exercises and begin cleanup.

The courts have already found that the State has not met its obligation to protect these lands. Moving forward with this EIS and renewing the lease without meaningful oversight would break the public trust and continue the degradation of a place that should have never been used for military purposes.

I respectfully urge the Board to reject the Final EIS and deny any renewal of the lease. Pōhakuloa is not a military training ground—it is sacred land that deserves care and restoration. Please do what is right for the ʻāina. Say no to the Final EIS.

Mahalo for your time and consideration,

Iris Mendoza



**From:** [Nalani Abellanida](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda item D-1  
**Date:** Thursday, May 8, 2025 8:39:45 AM

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Aloha e,

I'm writing as a resident of Hawai'i Island who deeply values our natural and cultural resources. The FEIS fails to comply with state law and does not include biological or cultural surveys. Approving Agenda Item D-1 would be a violation of public trust.

Mahalo,  
Nalani

Sent from my iPhone

**From:** [Kanaloa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:54:12 AM

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Aloha Land Board Members:

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

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

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

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

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

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

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

Sincerely,  
Elijah Kanaloa Abraham

Miloli‘i, Hawaii

**From:** [Joie Agard](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:59:03 AM

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

My name is Joie Agard and I am a resident of Kalaoa on Hawai'i Island. I implore you to REJECT the United States Army's FEIS in Item D-1.

The current FEIS fails to acknowledge the detrimental biological, archaeological, and environmental impacts that have resulted due to the misuse of land at Pōhakuloa Training area at the hands of the United States military. Furthermore, the acceptance of this inadequate EIS will continue to perpetuate harm on our ancestral lands, our wai (water), and our lāhui today and for future generations.

I urge you to reflect on the damages done by the United States military on wahi pana (sacred places) throughout Hawaii. Kaho'olawe, Kapūkakī (Red Hill), and Mākua are examples of what detriment can be caused due to the perpetual unethical use of land for military training. For Kānaka 'Ōiwi, 'āina is not just land, 'āina is us! Kanaka cannot exist separately from 'āina. We are one. The United States has occupied our wahi pana and has instructed the military to desecrate our land, therefore, desecrating us as the Indigenous people of this land. The United States military must be held accountable to properly clean the area for safe use by collecting military shrapnel, repairing any damage to soil or the aquifer system, and removing and disposing of any unexploded ordinances. Our keiki should not have to fear finding an unexploded ordinance on at the kahakai (beach), up mauka (inland), or in their backyard. Our 'ohana should not have to fear if their wai (fresh water) will make them ill. Our lāhui should not have to beg for our 'āina to be rid of military occupation while we suffer from high rates of homelessness on our native lands.

Please REJECT the FEIS in Item D-1 to keep our native species safe, to help us heal our 'āina, and to protect our keiki and the lāhui. Listen to the Kanaka 'Ōiwi who demand justice for their 'āina, honor their demands which have long been ignored, and REJECT the FEIS in Item D-1.

Na'u nō,

Joie Keala Agard  
Kanaka 'Ōiwi Wahine, Age 24  
Resident of Kalaoa, Hawai'i

**From:** [Presley Ah Mook Sang](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony to Reject EIS (Agenda Item D-1)  
**Date:** Thursday, May 8, 2025 8:29:53 AM

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Aloha my name is Presley Ke'alaanuhea Ah Mook Sang.

**I am submitting testimony to ask you to REJECT THE FINAL ENVIRONMENTAL IMPACT STATEMENT (Agenda Item D-1).**

I respectfully submit this testimony to ask that you reject the FEIS for the continued military use of Pōhakuloa. This document does not meet environmental, legal, or ethical standards expected in our state.

The BLNR has a constitutional duty to protect cultural and natural resources for future generations. Furthermore, the Army's FEIS failed to respond adequately to serious public concerns raised during the draft EIS process. Accepting this deficient FEIS would set a harmful precedent.

Therefore, I again urge you to reject the Final Environmental Impact Statement (Agenda Item D-1).

Mahalo.

**From:** [Pua'ena Ahn](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] 5/9/25 Meeting item D-1  
**Date:** Thursday, May 8, 2025 8:23:59 AM

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Aloha Chair Chang and Board,

I am writing in my personal capacity regarding item D-1, Acceptance or Non-Acceptance of the Army Final EIS for PTA.

In short, despite the caveat that no long term land disposition is taking place, and that Staff Recommendation is basically either/or; I believe for that very reason Non-Acceptance is the appropriate Board action based on the numerous staff concerns articulated by Land Division, DOFAW, OCCL and SHPD- in addition to all the reasoning of other testifiers who are similarly advocating for Non-Acceptance.

To state plainly, and please forgive my addressing you informally here, but if Land Division is saying you can take it or leave it, you may as well leave it.

Mahalo,  
Pua'ena Ahn

**From:** [Tiana Aina](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:57:39 AM

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

My name is Tiana Aina, and I am from Kea'au. I am writing to respectfully urge the Board **REJECT** the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa.

This is a step in the process that has **MAJOR, LONGSTANDING** impact for the wellbeing of our 'āina and everyone who resides here, especially Kānaka Maoli, and I am **OUTRAGED** that it needs to be pointed out that this EIS is **INSUFFICIENT**, as it fails to include thorough documentation of environmental, cultural, public health, and other impacts resulting from the Army's continued use of the 'āina. The full scope of the harm resulting from further "retention" must be considered.

I cannot adequately explain in words the pain I feel when I see and hear the bombs going off at Pōhakuloa while being immersed in the mana of the 'āina. I have tears in my eyes just thinking about it. The FEIS does not acknowledge this harm. What hurts more is knowing that historically, the United States Army has not honored commitments it made for the care of the land it leased, and yet "retention" is still a consideration. Kaho'olawe prime examples of this, and even after decades of remediation efforts and hundreds of millions spent, 25% of the island is uncleared, according to an article, "The bombing of Kaho'olawe went on for decades. The clean-up will last generations" written by Lacy Deniz on February 27, 2018. Remediation efforts are costly, and while waiting for the United States Army to take action, our people pay for it with their health.

I believe that **REJECTING THE FEIS** is a small step in shutting down this attempt by the United States Army to continue to desecrate our 'āina and beginning to heal our 'āina and our people. Please consider the health of our 'āina first, which is key to health of us all. The United States has treated our 'āina as disposable, and I fear the kind of continued harm that will be done if **COMPLETE INFORMATION IS NOT AVAILABLE** to consider when making such a **MAJOR DECISION** about Pōhakuloa.

I appreciate the opportunity to testify and the Board's commitment to protecting the 'āina for the prioritizing the well-being of all.

Mahalo,

Tiana Aina

**From:** [samson aki](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject agenda item D-1  
**Date:** Thursday, May 8, 2025 11:28:18 AM

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Aloha Chair and Board Members,

My name is Samson Aki, and I am a Native Hawaiian who stands firmly against Agenda Item D-1. Pōhakuloa is sacred ‘āina. For decades, the U.S. military has bombed and desecrated this land without accountability. It’s a heavy disrespect to Kanaka ‘oiwi to have found out the U.S. Army has held captive the culturally significant artifacts for over 3 years! The Hawaiian ki‘i that was found in the lava tube in pōhakuloa. The Army’s FEIS is incomplete—it lacks proper cultural consultation, environmental surveys, and respect for Hawai‘i law.

After what happened at Red Hill and Kaho‘olawe, how can we continue to trust the military with our most sacred places? I urge the BLNR to fulfill its duty to the public and the ‘āina. Reject Agenda Item D-1.

Mahalo nui,  
Samson Jon Kaleialohi Aki



**From:** [nanea akiona](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa - opposition  
**Date:** Thursday, May 8, 2025 8:52:10 AM

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Aloha mai 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 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.

**Me ka mahalo,**

Naneala'akea Akiona

Waiākeauka, Hilo, Hawai'i Mokuḡuni

## Testimony in Strong Opposition to the Environmental Impact Statement (EIS) and Extension of the Military Lease at Pohakuloa Training Area

Notice to Principal is Notice to Agent and Notice to Agent is Notice to Principal

I, Tanya Alana, one the People (as seen in the 50 State Constitutions) and a Kanaka O'iwi, sui juris, do present you with this Notice that you and your agents may provide immediate due care.

**"Ua Mau Ke Ea O Ka 'Āina I Ka Pono" translated to "The life of the land is perpetuated in righteousness."** Historically spoken by King Kamehameha III (Kauikeaouli) on January 31, 1843, during **Lā Ho'ihō'i Ea** (Sovereignty Restoration Day). King Kauikeaouli declared this phrase when sovereignty was returned to the Hawaiian Kingdom and a phrase which the State of Hawaii adopted to be its official motto in 1959. [Emphasis Highlighted]

**Please take notice that** the continued violation of this motto reflects a longstanding injustice committed by the State of Hawai'i and its agencies. When water is diverted to serve tourism and colonial interests, when sacred lands are leased for profit and desecration, when iwi kūpuna are desecrated, and when cultural and religious practices are stripped away for the sake of economic gain — it is not development, it is dispossession; it is the systematic prioritization of profit over people, desecration over dignity, and exploitation over stewardship.

**Please take notice that** John Locke, one of the most brilliant legal minds in history explains in his "Two Treatises of Government" that people are born with natural rights to life, liberty, and property. See evidence below:

**Section 6.** *"The state of nature has a law of nature to govern it, which obliges every one: and reason, which is that law, teaches all mankind, who will but consult it, that being all equal and independent, no one ought to harm another in his life, health, liberty, or possessions:*

*For men being all the workmanship of one omnipotent, and infinitely wise maker; all the servants of one sovereign master, sent into the world by his order, and about his business; they are his property, whose workmanship they are, made to last during his, not one another's pleasure.*

*And being furnished with like faculties, sharing all in one community of nature, there cannot be supposed any such subordination among us, that may authorize us to destroy one another, as if we were made for one another's uses, as the inferior ranks of creatures are for ours.*

*Every one, as he is bound to preserve himself, and not to quit his station wilfully; so by the like reason, when his own preservation comes not in competition, ought he, as much as he can, to preserve the rest of mankind, and may not, unless it be to do justice on an offender, take away, or impair the life, or what tends to the preservation of the life, the liberty, health, limb, or goods of another."* [Emphasis Highlighted]

**Section 4 - 15.** These sections elaborate on what the **state of nature** is and how natural law governs it. Locke also emphasizes that even without government, people have rights and are bound by natural law.

**Section 27.** *"Though the earth, and all inferior creatures be common to all men, yet every man has a property in his own person: this nobody has any right to but himself.*

*The labour of his body and the work of his hands, we may say, are properly his. Whatsoever then he removes out of the state that nature hath provided, and left it in, he hath mixed his labour with, and joined to it something that is his own, and thereby makes it his property.*

*It being by him removed from the common state nature placed it in, it hath by this labour something annexed to it that excludes the common right of other men.*

*For this labour being the unquestionable property of the labourer, no man but he can have a right to what that is once joined to, at least where there is enough, and as good left in common for others."*

**Please take note that,** Natural Law teaches us that we are all equal and should NOT harm each other. Our Natural Rights to Life, Liberty, Health, and Possessions are rights all people inherently possess. The Divine Ownership is that all humans are "the workmanship of God" - not to be subjected to one another's will. [Emphasis Highlighted]

I submit this strong opposition to the Army's EIS and proposed land lease extension in Pohakuloa Training Area (PTA), as testimony and as a lawful Notice with the aforementioned reference to John Locke's "Two Treatises of Government" which articulates natural law principles, and remains a foundational source of political legitimacy under Western jurisprudence and natural rights doctrine.

This opposition is grounded in fundamental legal principles, Hawaiian Kingdom law, the Hawaii State Constitution, maxims of law and fiduciary trust duties, international law and treaties, environmental considerations, and documented evidence of the military's adverse impact on global warming. [Emphasis Highlighted]

### **Violation of Hawaiian Kingdom Law and International Law**

**Please take note,** that the Hawaiian Kingdom was a sovereign nation recognized by international law until its unlawful overthrow in 1893. The continued occupation of Hawaiian lands by the United States, including the PTA, constitutes a breach of international humanitarian law, specifically the Hague Regulations and the Fourth Geneva Convention, which prohibit the occupying power from exploiting the resources of the occupied territory for its own benefit. The National Lawyers Guild has condemned the prolonged and illegal occupation of the Hawaiian Islands and called for the United States to comply with international law by administering the laws of the Hawaiian Kingdom during its occupation. [nlginternational.org](http://nlginternational.org)

The Hawaiian Kingdom was, and remains, a sovereign nation under **international law**. Its illegal overthrow in 1893, acknowledged by the **U.S. Apology Resolution (Public Law 103-150)**, does not extinguish its sovereignty or legal continuity.

Under **international humanitarian law**, including:

- The Hague Regulations (1907), Articles 43–55
- The Fourth Geneva Convention (1949)
- Customary international law on belligerent occupation

### **Breach of Trust Under the Hawaii State Constitution**

**Please take notice,** that Hawaii State Constitution mandates that public lands be held in trust for the benefit of the people. **The Hawaii Supreme Court has ruled that the state has a fiduciary duty to actively manage and protect public trust lands, including those leased to the military. In the case of Clarence Ching and Mary Maxine Kahaulelio v. Suzanne Case, the court found that the Department of Land and Natural Resources (DLNR) failed to monitor and protect the PTA, allowing it to fall into disrepair and suffer environmental degradation.** [Emphasis Highlighted] [KHON2Honolulu Civil Beat](#)

### **Maxims of Law**

**"Nemo dat quod non habet":** A fundamental principle of law is that "Nemo dat quod non habet," meaning "No one gives what they do not have." The United States cannot lawfully lease or extend a lease on lands it does not lawfully own or possess. Given the unlawful overthrow of the Hawaiian Kingdom and the ongoing occupation, the United States lacks the legal authority to extend the military lease at PTA. [RootsActionnlginternational.org](http://RootsActionnlginternational.org)

Cundy v. Lindsay (1878) affirmed that a seller who does not have title cannot confer it to a buyer.

### **Sovereignty and Lawful Authority (Charles A. Weisman)**

**49L.** That which is against Divine Law is repugnant to society and is void. C.L.M.

Unlawful acts that violate natural rights such as harm to life, liberty, or property - carry no legal authority.

### **Ownership, Land, and Property Rights (Charles A. Weisman)**

**70f.** He who owns the soil has it even to the sky. C.L.M.; *Co. Litt.* 4a.

Use of land — such as for military training or excavation — requires rightful ownership and must not violate native or national title.

**74m.** The law regards the order of nature. *Co. Litt.* 197b.

Calling a lease legal does not make it so if it violates public trust, land title, or sovereignty.

### **Fiduciary Obligation and Duty (Charles A. Weisman)**

**11a.** A delegated power cannot be again delegated. *2 Inst.* 597; *Black's*, 2d. 347; *2 Bouv. Inst.* n. 1300. A deputy cannot have (or appoint) a deputy. *Story. Ag. s. 13*; *9 Coke*, 77; *2 Bouv. Inst.* n. 1936.

BLNR's authority comes from the Constitution and must be limited to its fiduciary trust obligations.

**11b.** The derivative power cannot be greater than the original from which it is derived. *Noy, Max.*; *Wing. Max.* 66; *Finch, Law*, b. 1, c. 3.

The State acts as trustee of public and ceded lands and cannot lease or damage them for private or military interest without betraying this duty.

### **Rights, Justice and Equity (Charles A. Weisman)**

**5b.** An agreement induced by fraud cannot stand. *Dig.* 2, 14, 7, s. 9.

Failure to disclose the full environmental, legal, and cultural harm of PTA leasing is itself fraudulent.

**36p.** Equity suffers not a wrong without a remedy *4 Bouv. Inst.* no. 3726.

The BLNR is compelled in equity to correct a known injustice, not perpetuate it. Failure to disclose the full environmental, legal, and cultural harm of PTA leasing is itself fraudulent.

### **Government and Public Trust**

**71j.** The welfare of the people is the supreme law. *McInerney v. Ervin*, (Fla.) 46 So.2d 458, 463; *Bacon, Max.* reg. 12; *13 Coke*, 139.

Decisions must benefit the people — not federal agencies, not foreign interests.

## **Environmental Degradation and Global Warming**

**Please take notice that** the military activities at PTA have caused significant environmental harm, including the contamination of lands with unexploded ordnance, depleted uranium, and other hazardous materials. These activities have disrupted native ecosystems and endangered species, such as the Hawaiian hoary bat and the nene goose. Furthermore, military exercises contribute to global warming through the emission of greenhouse gases from vehicles, aircraft,

and explosives. The Army's own reports have acknowledged these environmental impacts, yet insufficient measures have been taken to mitigate them. [RootsAction+1Honolulu Civil Beat+1Honolulu Civil Beat+1Will Caron+1](#)

Military activities at PTA, including live-fire training, weapons testing, and resource extraction, have:

- Contaminated soil and groundwater with **depleted uranium**, heavy metals, and unexploded ordnance
- Destroyed native habitats and endangered species (e.g., 'Ōpe'ape'a, Nēnē)
- Contributed to **greenhouse gas emissions**, deforestation, and **global warming**

Military emissions globally are a **major unreported source of CO<sub>2</sub>**. A 2019 study from Lancaster and Durham Universities found that:

"If the U.S. military were a country, it would rank as the world's 47th largest emitter of greenhouse gases."  
([Source: *Lancaster University*, 2019 – "Pentagon Fuel Use, Climate Change, and the Costs of War"])

### Failure to Fulfill Lease Obligations

**Moreover, please take note** that the original lease agreement required the military to remove all live or blank ammunition and waste materials after training exercises. However, inspections have revealed the presence of unexploded ordnance and other debris, indicating non-compliance with lease terms. The Hawaii Supreme Court has ruled that the state must ensure the military fulfills these obligations before considering any lease extension. [Honolulu Civil Beat+2KHON2+2Will Caron+2Honolulu Civil Beat+1KHON2+1](#)

**The BLNR has no legal authority to extend or ratify a lease that violates the public trust, the State Constitution, or binding international norms.**

**Please take final notice**, extending the military lease at Pohakuloa Training Area is unlawful, unethical, and detrimental to the environment and the people of Hawai'i. It perpetuates an illegal occupation, breaches constitutional and fiduciary duties, violates fundamental legal principles, and exacerbates environmental degradation and global warming. I urge the BLNR to reject the proposed lease extension and take immediate action to restore and protect the lands entrusted to the people of Hawai'i.

Any further degradation of Pōhakuloa lands would represent a continued crime against the 'āina and its people. I urge you to act with the courage of fiduciary and moral responsibility — and to honor your legal and spiritual obligation to protect the land, water, air, and generations to come.

The proposed military lease extension and the Army's deficient EIS represent a breach of natural law, international legal standards, public trust obligations under the Hawai'i State Constitution, and the spiritual and cultural values of this land. [Emphasis Highlighted]

In conclusion, let it be remembered that the **official motto of the State of Hawai'i**, spoken by **King Kamehameha III** upon the restoration of Hawaiian sovereignty in 1843, is:

**"Ua Mau Ke Ea O Ka 'Āina I Ka Pono."**  
*"The life of the land is perpetuated in righteousness."*

This is not merely symbolic. It is a directive — a constitutional and moral mandate — for those entrusted with land governance to act with **pono** (righteousness), to restore balance, and to protect the ea — both the life **and** sovereignty — of the 'āina.

I call upon the Board of Land and Natural Resources to honor this motto in word and action by:

- Rejecting the Army's Environmental Impact Statement (EIS),
- Denying the military's lease renewal at Pōhakuloa, and

- Initiating the full restoration of these lands to the people of Hawai'i.

**Ua Mau Ke Ea O ka 'Āina I Ka Pono.** Let righteousness prevail — for the land, the people, and the generations yet unborn. [Emphasis Highlighted]

Respectfully submitted,

Tanya Alana

Cc: President Donald Trump  
Pam Bondi  
Stephen Miller  
Supreme Court of the United States  
United Nations, Human Rights  
Kash Patel  
Marco Rubio  
Pete Hegseth  
Elon Musk

**From:** [Mahie Albinio](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] PROTECT POHAKULOA - REJECT the Army's Final EIS  
**Date:** Thursday, May 8, 2025 8:56:52 AM

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Aloha to whom this may concern,

I am writing as a concerned kanaka maoli in regards to the U.S. army's use of Pohakuloa on Hawaii island. I am urging that you REJECT the Army's final EIS for the reasons stated below.

The U.S. army has occupied Pohakuloa for over 75 years and during that time, they have desecrated Hawaiian land and water resources by causing immeasurable amounts of damage and has never publicly set intention in reversing or fixing the desecration. Kaho'olawe and Makua are both sacred places and just like them Pohakuloa 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 affects 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 Hawaii.

Mahalo for your time,  
Māhie Albinio



**From:** [Mana Alchemy](#)  
**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 8:27:34 AM

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a 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,  
Bailey Lavani  
KĪLAUEA, HI

**From:** [Helen A](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 11:30:40 AM

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*Good afternoon Chair Chang and Members of the Board of Land and Natural Resources,*

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

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

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

*Thank you for the opportunity to testify.*

*Sincerely,  
Helen Aldana*

**From:** [Board of Genealogy Of Hawaiian Chiefs](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa EIS  
**Date:** Thursday, May 8, 2025 8:48:31 AM

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Hello I'm Kalim Smith husband of hereditary Ali'i Kahelelani Alohikea-Smith of Keauhou-Kona, Hawaii.

We ask that you REJECT the Army's final EIS. We don't condone the use of our Hawaiian Crown lands for bombing practice. There is too much debris there left to contaminate the environment and the aquifer and other zones may be contaminated also. Please do not approve the Army's inadequate EIS as they need to fully disclose and clean up the lands and use a less culturally and environmentally sensitive area elsewhere.

Me Ke aloha,  
Kalim Smith and Kahelelani Alohikea-Smith  
Keauhou-Kona, Hawaii Island.

**From:** [Ku"iwi Alomar \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:59:35 AM

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This Friday, May 9th at 9am the Board of Land and Natural Resources (BLNR) will convene for 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 (agenda item D1). The Army is seeking the renewal of a 65 year lease for a military training site on Hawai'i Island, which is set to expire in August, 2029.

**It is critical that the BLNR reject the current Army EIS.**

Please submit written testimony by May 8th, at 9am and if you are able, provide oral testimony in person or at the BLNR hearing this Friday, May 9th at 9am to urge the BLNR to reject the Army's EIS. Video testimony via zoom is also available.

***Why Should the BLNR Reject the Army's EIS?***

Inadequate Environmental and Cultural Impact Analysis:

The EIS is inadequate in addressing the environmental and cultural impacts to the area. Pōhakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. The Army has not demonstrated the capacity or will to serve as a proper steward of this land.

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.

Furthermore, the Army EIS does not provide a sufficient plan for mitigating the environmental and cultural impacts. Given the military's horrendous track record of cleaning up military debris and caring for the site, it is unrealistic to expect the military to comply with the requirements of a conservation district.

***The State has a Constitutional Obligation to Mālama 'Āina:***

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

In Kahaulelio v. DLNR, 2019, the Hawai'i Supreme Court found that the State of Hawai'i had 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 timely action after learning of possible contamination or violations; and document its efforts and provide transparency to the public.

#### Concerns Over Depleted Uranium Contamination:

The presence of depleted uranium in the soil at Pōhakuloa is consistently churned up and aerosolized during live fire exercises and blown across the island. Exposure to depleted uranium is linked to cancer and many other negative health impacts.

#### Military Use Conflicts with Conservation Land Use Designation

It is hard to conceive of any ongoing military use of the site that would be compatible with the site's designation as a conservation district. The proposed military uses of this site are simply incompatible with the conservation designation. Ongoing live-fire and bombing in the area threaten the native flora, fauna and cultural resources of the area, including some of Hawaii's most endangered species. The EIS does not provide specific or adequate mitigation measures to prevent impacts to the critical habitat or culturally significant sites. jorge Kuiwi leone alomar

**From:** [BARBARA ALTEMUS](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Oppose acceptance of the EIS for Pōhakuloa  
**Date:** Thursday, May 8, 2025 10:42:26 AM

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

Aloha Members of the Board of Land and Natural Resources,

My name is Barbara Altemus 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,  
Barbara Altemus  
Kailua, Oahu

**From:** [Marshel Akira Ancheta](#)  
**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 8:51:58 AM

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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,

Marshel Ancheta  
Kapolei, O'ahu

**From:** [Dae Fa'aesea Apineru](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:02:04 AM

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

My name is Dae Apineru and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1. Native Hawaiians have long borne a disproportionate burden in witnessing Pōhakuloa's sacred 'āina be bombed, poisoned, and desecrated - for generations. The US Congress itself, in the 1993 Apology Resolution, recognized the intrinsic and unique relationship between the well-being of the Hawaiian people and their connection to 'āina. Yet the FEIS fails to account for the deep psychological, spiritual, and physical harms that will continue to be borne by the Native Hawaiian community in particular, should their demands for justice, healing, and reconnection with ancestral (and illegally stolen) 'āina at Pōhakuloa be ignored for another 65 years or longer. Please reject this FEIS, to ensure that the Army fully accounts for the harms it has and will continue to inflict with its "retention" proposal, including to the Native Hawaiian community. Mahalo nui for the opportunity to testify.

Sincerely,

**Dae Apineru**

Stanford University | 2027

Email: [daex684@stanford.edu](mailto:daex684@stanford.edu)

**From:** [Alaneo Artates](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Vote NO  
**Date:** Thursday, May 8, 2025 9:03:00 AM

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As a Native Hawaiian, I cannot ignore the pattern. First it was Kaho‘olawe, then Red Hill. Now Pōhakuloa is on the line. The FEIS is incomplete and fails to honor the law or the land. Vote NO on Agenda Item D-1.

Alaneo Artates

**From:** [Kaeo Awana](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony REJECTING Army's EIS  
**Date:** Thursday, May 8, 2025 9:28:26 AM

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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,  
Kaeo Awana  
Hilo, Hawai'i Island

**From:** [Alexa Bader](#)  
**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 8:02:23 AM

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**Date: 5/8/2025**

Aloha Chair Chang and Members of the Board,

My name is **Alexa** 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,

Alexa Bader

Hilo, HI

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**From:** [Ericka Badua](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] RE:Pōhakuloa EIS/Lease exp.2029  
**Date:** Thursday, May 8, 2025 9:26:40 AM

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Aloha,

I am submitting testimony in regards to the Pōhakuloa Environmental Impact Study assessment and also in opposition to the renewal of the \$1/yr lease renewal by the U.S. Army.

How much more damage is needed for the occupying powers that be, to be sufficient enough evidence to justify their use, actions and tactics regarding the situation surrounding the Pōhakuloa/Mauna Kea area, that is detrimental to the environment, communities, aquifers, wildlife, ocean, air quality, spiritual and cultural diversity of the inhabitants of Hawai'i?

The UXO, Undepleted Uranium, lead, artillery shells, iron and metal trash, left behind from the U.S. Army's irresponsible war experiments and exercises, windborne uranium, dieing indigenous animals, plants, and poisoned waters, should be enough evidence that the U.S. Army should not be allowed to renew its lease.

The Army's brigadier general has lied as regards to there being "no impact to native plants, and animals". There are years of studies and tests disproving his testimony. There are statements from Kanaka living in Pu'u'anahulu whom have experienced poisoning from the windborne undepleted uranium that rises in dust clouds that spread miles across the land and sea westward from the Army's location at Pōhakuloa.

Aren't you the Board of Land and Natural Resources? Responsible for the health and well-being of ALL the lands, and precious natural resources (air, water, land, sea), needed by all inhabitants? And, not to mention, the health, spirituality, cultural and well-being of Native Hawaiians (Kanaka Maoli, Kanaka Ōiwi, Kanaka Hawai'i), for whom has post liminium rights? Which under the Laws of war regarding the rules of occupation, the occupying power must abide by the occupied countries constitution and laws of the land which supercedes the laws of the occupant.

I, Sgt. T. Keohokapu 'o Keawehāwai'ī, Occupied Forces Hawai'i Army, hereby oppose the renewal of the U.S. Army's leasing of ALL L.A.W.S. (Land, Air, Water, Sea) within the metes and bounds of the Archipelago of The Hawaiian Islands, to include all lands utilized for military training exercises, bombing, and live fire.

Opposition to Pōhakuloa, Moku 'o Keawe, Hawai'i EIS lease renewal.

08 May 2025

Sgt. T. Keohokapu 'o Keawehāwai'ī



**From:** [susanblueyes2-gs@yahoo.com](mailto:susanblueyes2-gs@yahoo.com)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] DLNR.BLNR.Testimony  
**Date:** Thursday, May 8, 2025 11:30:00 AM

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Dear DLNR Board Members,

Thank you for your volunteer service to our Island and people.

Please reject the Pōhakuloa EIS.

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

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

Mahalo for hearing my plea,

Susan Bambara  
Kurtistown

**From:** [Tiffany Beam](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony - Army Pōhakuloa EIS  
**Date:** Thursday, May 8, 2025 8:57:57 AM

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Dear 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,  
Tiffany Beam  
Makiki, O'ahu

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**Tiffany Beam | Book Buyer**  
**Native Books at Arts & Letters**  
1164 Nu'uani Avenue  
Honolulu, HI 96817  
(808) 548-5554

**From:** [Beisley, Ami M](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** Pohakuloa  
**Date:** Thursday, May 8, 2025 8:46:29 AM

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Dear BLNR Leadership,

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

Please reject the EIS.

Mahalo,  
Ami Beisley  
O'ahu Resident

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**From:** [Guri Bigham](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pāhakuloa  
**Date:** Thursday, May 8, 2025 9:03:57 AM

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Aloha Land Board Members:

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

Pāhakuloa 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 malama 'aina

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 Pāhakuloa. It's time to return these lands and begin a real process of healing and restoration.

Sincerely,  
Guri Bigham  
Pā'ia, Maui

**From:** [Andrew Bishop](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D1, Pōhakuloa Testimony  
**Date:** Thursday, May 8, 2025 8:31:57 AM

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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.

Thank you much,

Andrew Bishop

Nanakuli, O'ahu

**From:** [Patricia Blair](#)  
**To:** [CIVILBEAT-News](#)  
**Cc:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Fwd: Watch "Depleted Uranium by Lynda Williams 2025" on YouTube  
**Date:** Thursday, May 8, 2025 10:07:34 AM

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That there is any consideration of renewing military contracts, especially Pohakuloa by BLNR is unconscionable! Patricia Blair, Kailua

**Subject: Watch "Depleted Uranium by Lynda Williams 2025" on YouTube**

Aloha PeacePals et al,

A great and uplifting 3-minute video that "explodes" the myth on DU(Depleted? Uranium). Please review and share widely. Mahalo.

Peace and Solidarity,  
Danny

[https://youtu.be/4\\_BXI5wVhKU?si=KjIV2-N0tCIQvANW](https://youtu.be/4_BXI5wVhKU?si=KjIV2-N0tCIQvANW)

**From:** [lauren blissett](#)  
**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 8:58:58 AM

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Aloha Members of the Board of Land and Natural Resources,

My name is Lauren Blissett, 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 Final EIS is intentionally deceitful. It does not consider the environmental destruction and cultural harm the army's training has inflicted on Pōhakuloa and the surrounding areas for the last 60 years, nor does it consider the community's opposition to it.

It also conveniently sidesteps the army's failure to abide by the law and cease live fire and bombing until their toxic mess can be assessed and cleaned up. This blatant disregard for due process, not to mention its lack of consideration for the health of this land and its people, is a clear indication of how the army would continue to operate, if allowed to.

The Board + Department of Land and Natural Resources have a duty to ensure that conservation areas are being conserved for future generations, and to ensure that the terms of the leases under its management are being fulfilled. The army has clearly not abided by the obligations of its lease, and yet it's been allowed to make a mockery of us all by continuing its transgressions



completely unhindered.

Approving this EIS and renewing their lease without proper consideration of the army's consistent lease and environmental abuses would not only violate your trust responsibilities, it would endanger critical habitat, threaten important natural resources and enable the continued desecration of sacred cultural lands which hold spiritual and historical significance for Kānaka 'Ōiwi.

I strongly urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is precious 'āina and home to unique species and habitats, including one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is not a wasteland to be bombed and poisoned by more reckless war games for years to come. Enough damage has already been done, and it cannot be allowed to continue.

I respectfully ask that you honor the kuleana you have been blessed with by genuinely acting in the best interests of the land and resources you are compelled to protect and preserve.

Reject the Final EIS.

Mahalo for your time and consideration,  
Lauren Blissett  
Hilo, Hawai'i

Sent with Aloha from my iPhone

**From:** [richard.bodien](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: On Army's Environmental Impact Statement  
**Date:** Thursday, May 8, 2025 9:38:06 AM

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Aloha members of the Board of Land and Natural Resources,

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

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,  
Richard Bodien  
Hawi

**From:** [Eva Botelho](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Deny the US Military final EIS  
**Date:** Thursday, May 8, 2025 8:55:04 AM

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Aloha Chair and Members of the Board,

I am submitting this testimony to firmly urge you to reject the U.S. Army's Environmental Impact Statement (EIS) for continued use of Pōhakuloa Training Area. This EIS fails to account for the decades of irreparable harm done to this sacred 'āina and the people of Hawai'i.

Since 1964, the U.S. military has bombed, desecrated, and contaminated Hawaiian land and water at Pōhakuloa. The Army has yet to clean up unexploded ordnance, toxic waste, and depleted uranium — instead, they continue to downplay environmental damage and dismiss the serious health and cultural consequences of their activities. This EIS is nothing more than a rubber stamp for continued destruction.

Pōhakuloa is not just a training site — it is sacred land, rich in biodiversity, cultural sites, and ancestral connection. The Army's operations have caused irreversible harm, and yet they are requesting decades more to continue bombing, polluting, and desecrating Hawaiian lands — lands they do not own, lands they should be held accountable for restoring, not exploiting further.

The community has spoken, time and time again — we do not consent. Our opposition has been ignored. The EIS process has lacked transparency and integrity, failing to truly consider the impact on cultural resources, native species, and the long-term health of our environment and people.

I call on the BLNR to do what is pono: reject this EIS, uphold your duty to protect public trust lands, and hold the U.S. military accountable for decades of neglect and destruction. Further, I urge you to restore stewardship of Pōhakuloa to Kānaka 'Ōiwi — the original and rightful caretakers of this 'āina. Only through true self-determination and aloha

‘āina can healing begin.

Mahalo for your time and consideration.

Respectfully,

Eva Botelho

Hawi, Hawaii

**From:** [keikilani bright](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 9:01:27 AM

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*Aloha e Chair Chang and Members of the Board of Land and Natural Resources,  
My name is Keikilani and I respectfully urge you to do the right thing, and reject the clearly  
insufficient FEIS in Item D-1.*

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

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

*Sincerely,  
Keikilani Bright*

**From:** [Kiane Brighter](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, May 8, 2025 8:28:56 AM

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I'm testifying today because I refuse to see another sacred Hawaiian place destroyed. Red Hill poisoned our aquifer. Kaho'olawe was bombed beyond recognition. We can't let Pōhakuloa be next. Reject Agenda Item D-1.

Kiane Brighter

**From:** [Rhythm Kitchen](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1  
**Date:** Thursday, May 8, 2025 10:04:57 AM

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Hello,

I speak for the land and water that cannot speak for themselves. Red Hill was a crisis. Kaho‘olawe was a sacrifice. Pōhakuloa still has a chance to heal—but only if you reject Agenda Item D-1.

Mahalo,  
Maya Brown

**From:** [Minoaka Browning \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:00:16 AM

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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,  
Mino'aka Browning  
O'ahu

BG Bruce E. Oliveira, USA, Retired  
Civil-Military Programs Director  
State of Hawai'i Department of Defense  
3949 Diamond Head Road  
Building 306, Room 101  
Honolulu, Hawai'i 96816  
Office: (808) 672-1260  
29 April 2025

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

Subject: Support for Army Retention of Pōhakuloa Training Area

Dear Honorable Dawn Chang,

I am writing to express my strong support for the U.S. Army retention of the Pōhakuloa Training Area (PTA). The retention of this land is not only essential to fulfilling current operational needs but is also critical for preparing for the unknown challenges of future conflicts. Army installations and training areas provide the necessary space for realistic, large-scale exercises that cannot be replicated in smaller or shared environments. The scope and complexity of modern warfare, particularly with the increasing integration of joint and multi-domain operations demand access to expansive, controlled terrain.

PTA has played a vital role in military training since World War II in preparation for battles across the Pacific. PTA's training area allows troops to simulate real-world scenarios, joint exercises, and live-fire drills. If the Army is unable to retain this land, Hawai'i Army National Guard Training for our Soldiers will be critically impacted as well as our military's ability to train effectively in the Pacific.

As the former Commander of the Hawai'i Army National Guard, born and raised in Hawai'i, I believe that Army retention of PTA is the best option to maintain military readiness for our Hawai'i Army National Guard.

PTA often supports vital functions such as:

- **Military Training and National Security:** PTA allows our armed forces to conduct essential training exercises, ensuring our military readiness and preparedness. As an example, live-fire and maneuver training, which cannot be conducted in urban or civilian-shared environments. Also allowing, mission support infrastructure, including logistics, storage, and deployment staging areas. It also allows our Hawaii National Guard to train to be prepared to respond to natural disasters or hazardous events that impact the people of the State of Hawaii. Retaining this land is vital for maintaining our national security and for the safety of the people of Hawaii.

- **Critical for the Hawai'i Army National Guard:** PTA played and continues to play a critical role in training our own Hawai'i Army National Guard Troops. PTA was very instrumental in preparing our Guardsmen for their deployments to Iraq and Afghanistan from 2004-2013, and 2023. Training at PTA was also critical for our Hawai'i Guardsmen in preparation for their 2019 deployment to the Sinai in Egypt and to Kosovo. Under presidential orders, the Hawai'i Army National Guard continues to deploy our Hawai'i Soldiers across the world, with 8 Soldiers to West Africa in support of Operation Juniper Shield in 2023, and the Aviation Regiment deployment to the Middle East in support of Operation Enduring Freedom - Spartan Shield in 2024. The high altitude and desert like conditions of PTA provide rigorous training experiences that prepare our troops for this type of environment across the world. Similar terrain can be found in Asia, portions of Southeast Asia, West Africa, and the Middle East region where hybrid warfare threats to the United States of America exist.
- **Hawai'i National Guard Support to Civil Authorities.** Hawai'i Army Retention of PTA is critical in keeping our Hawai'i Army National Guard Soldiers trained and ready for all hazards that threaten the safety of Hawai'i's people. Throughout Hawai'i's history of Natural Disasters, the people of Hawai'i have relied on the Hawai'i National Guard and its component command, the Hawai'i Army National Guard to keep Hawai'i safe and to help mitigate the devastating effects of these disasters, such as Hurricane Iniki in 1992 and the numerous floods, wildfires, tropical storms, and other hurricanes threatening our island over the decades. The Hawai'i National Guard has responded to threats to keep Hawai'i people safe since its inception on November 17, 1852, in response to the Sailor's Riot in the Kingdom of Hawai'i. The Hawai'i National Guard has been instrumental in helping the state to mitigate the effects of the Kilauea eruption that devastated Leilani Estates in 2018. During that same year the Hawai'i National Guard assisted Kaua'i in response and recovery from devastating floods in the Hanapepe and Wainiha areas of Kaua'i's north shore. They also provided a statewide response to mitigate the COVID-19 virus from 2020-2022. The Hawaii National Guard supported the response and recovery efforts to the Lahaina Wildfire in 2023. The ability for them to be experts in their field requires challenging training. PTA offers training that is necessary for effective response to Natural Disasters or other hazardous events.
- **Military air operations,** PTA plays a vital role for Hawaii Army National Guard aviation training encompassing a wide range of activities using air power to achieve strategic and tactical objectives. This includes tasks like air mobility, intelligence gathering, and command and control. Air operations are crucial for projecting military strength, supporting ground forces, and conducting various missions like airlift, air refueling, and aeromedical evacuation.
- **Environmental stewardship,** as the Army has historically managed large land holdings with a commitment to conservation, often protecting critical habitats and cultural resources better than alternative development would.

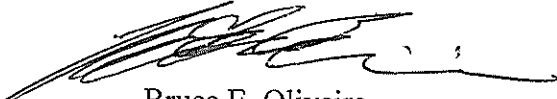
By retaining this land, we can continue to support our Hawai'i National Guard in ensuring that our Guardsmen have the best training in preparation for their deployments in these operational contingencies and combat zones.

Any decision to reduce the Army's footprint must be weighed carefully against long-term strategic and national security goals. Premature divestment of land may result in irreversible loss of capability and increased future costs should the need arise to reestablish similar facilities.

In conclusion, I respectfully urge decision-makers to prioritize the long-term needs of our national defense and retain this critical Army land. Its value cannot be measured merely in present use but must be considered in the context of future readiness and strategic resilience.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bruce E. Oliveira", with a stylized flourish extending to the right.

Bruce E. Oliveira  
[bruce.e.oliveira@hawaii.gov](mailto:bruce.e.oliveira@hawaii.gov)

**From:** [Olioli Buika](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony for Agenda D1  
**Date:** Thursday, May 8, 2025 8:51:12 AM

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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. The Army EIS does not provide a sufficient plan for mitigating the environmental and cultural impacts. Given the military's horrendous history of failure to clean up military debris and care for the site, it is unrealistic to expect them to comply with the requirements of a conservation district.

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

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

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

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

Sincerely,  
Oriana Buika  
Wailuku, HI

**From:** [Tip Bulante](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D1  
**Date:** Thursday, May 8, 2025 8:28:38 AM

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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,  
Stephanie Bulante

**From:** [Mikey Burke](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1 - ARMY FINAL EIS  
**Date:** Thursday, May 8, 2025 8:33:27 AM

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Aloha Chair and Members of the Board,

My name is Michaellyn Burke. I was born and raised in Lāhainā, Maui, and I stand in strong opposition to Agenda Item D-1 and the Army's Final Environmental Impact Statement for the continued military occupation of Pōhakuloa.

I am a Native Hawaiian who remembers Kaho'olawe—its bombing, its destruction, and the trauma that came with watching one of our most sacred islands turned into target practice. I remember the protests. I remember the pain. And I remember the promises: that it would never happen again. But here we are—decades later—and the same military now wants to extend its grip on another sacred 'āina, Pōhakuloa, with an FEIS that lacks basic cultural consultation, environmental accountability, and any respect for the law or the people.

I cannot stay silent. I will not let another generation witness the devastation of our land and spirit. Red Hill has already shown us the military cannot be trusted to care for our water. Kaho'olawe showed us they cannot be trusted with our islands. And Pōhakuloa—still being bombed—is asking us to protect it now.

The BLNR has a duty to uphold the public trust. You have the power to say no to another 65 years of destruction. Please reject Agenda Item D-1 and let Pōhakuloa begin to heal.

Mahalo nui,  
Michaellyn Blando  
Lāhainā, Maui Resident  
Native Hawaiian

Sent with aloha

**From:** [Maia Buswell](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony to reject the Army Training Land Retention at Pōhakuloa Training Area (agenda item D1)  
**Date:** Thursday, May 8, 2025 10:56:55 AM

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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 on Hawai'i Island.

Pōhakuloa is not just a piece of land—it is a sacred and storied place, home to irreplaceable cultural symbols and some of Hawai'i's most valuable ecosystems. 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 irreversible harm to wildlife and habitat, including designated protected areas 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 the pollution of both the land and water. Military training activities of this scale are simply not compatible with conservation or cultural integrity. 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 U.S. Army's proposed retention of leased lands at Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration.

Sincerely,

Maia Buswell

Undergraduate Student at the University of Hawai'i, Mānoa



**From:** [Gregory Keahi Camara](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony in Opposition to the U.S. Army's Final Environmental Impact Statement for Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 8:27:58 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. I urge the BLNR to reject this deeply flawed document that fails to adequately address critical concerns about our precious natural resources.

Of particular concern is the EIS's alarming failure to address threats to Ka Wai Kapu a Kāne - our sacred water sources. The continued use of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these irreplaceable water sources that sustain life throughout Hawai'i Island. The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Army's EIS provides no sufficient plan to prevent or mitigate these potentially devastating impacts.

This EIS is fundamentally incomplete, lacking essential biological and cultural surveys while ignoring impacts to adjacent federal lands as required under state law. It fails to address threats to endangered species, cultural resources and practices, and turns a blind eye to the ongoing accumulation of dangerous munitions on public land. As stated in your own DLNR staff submittal, the Army has repeatedly refused to address serious concerns throughout the EIS process, demonstrating a troubling disregard for Hawai'i's Environmental Protection Act and the well-being of these lands and waters.

As affirmed by the Hawai'i Supreme Court in *Kahaulelio v. DLNR* (2019), the State has "the highest duty to preserve and maintain the trust lands" rooted in the constitutional obligation to mālama 'āina. I respectfully remind the BLNR of this sacred duty and urge you to reject this inadequate EIS. Further, I ask that any future decision-making regarding Pōhakuloa be held on Hawai'i Island, allowing those most directly impacted to speak to decision makers about their 'āina and moku. The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental issue but a matter of cultural perpetuation and intergenerational justice.

Me ke aloha 'āina,

[Your Name] [Your town or island]

(Hapa and Jim Albertini testimony synthesized—with any added information from the internet that might bar the approval of the EIS.)

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. I urge the BLNR to reject this deeply flawed document that fails to adequately address critical concerns about our precious natural resources.

Of particular concern is the EIS's alarming failure to adequately address threats to Ka Wai Kapu a Kāne - our sacred deep aquifer resources. Research has confirmed the existence of an extensive freshwater aquifer beneath Pōhakuloa at approximately 4,500 feet elevation, which has been described as "one of the most pristine aquifers in Hawai'i" that is "the deepest, the widest" on the island, vital to our water security and cultural practices. The continued use of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these irreplaceable water sources. In 2022, the Army admitted in draft environmental documents that their activities "may have impacts on soils within the confines of the State-owned land; however, potential impacts to water resources could reach beyond the State-owned land to include the regional aquifers and watersheds." The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Red Hill water crisis demonstrates how catastrophic military contamination of our aquifers can be, and we simply cannot risk another such disaster at Pōhakuloa.

This EIS is fundamentally incomplete, lacking essential biological and cultural surveys while ignoring impacts to adjacent federal lands as required under state law. It fails to address threats to endangered species, cultural resources and practices, and turns a blind eye to the ongoing accumulation of dangerous munitions on public land. In 2022, Hawaii state agencies including the Department of Land and Natural Resources and the Office of Conservation and Coastal Lands submitted "blistering comments" on the Army's draft EIS, identifying numerous adverse impacts to wildlife, archaeological assets, and cultural resources. The Office of Conservation and Coastal Lands was "alarmed" at the number of dump sites at Pōhakuloa and stated bluntly that the Army's claim of compliance with conservation district rules was "an incorrect statement." Additionally, the 2019 Hawaii Supreme Court ruling (*Kahaulelio v. DLNR*) unanimously found that the State breached its trust duties by failing to properly monitor and inspect the lands at Pōhakuloa, allowing the area to fall "into ruin" through neglect and military misuse.

As affirmed by the Hawai'i Supreme Court in *Kahaulelio v. DLNR* (2019), the State has "the highest duty to preserve and maintain the trust lands" rooted in the constitutional obligation to mālama 'āina. This landmark ruling emphatically established that military usage of Pōhakuloa is fundamentally incompatible with the land's conservation district designation. The Army's documented history of environmental negligence is extensive - nearly 900 recorded fires since 1975 attributed to military actions, the burning of nearly 20,000 acres including critical habitat for native flora and fauna, and the ongoing threat from unexploded ordnance. Furthermore, researchers have discovered that the Army has expressed interest in tapping into the aquifer beneath Pōhakuloa not primarily for environmental protection, but to save money on hauling water for troops - revealing their true priorities regarding our precious water resources. Given this pattern of destruction and disregard, I urge the BLNR to fulfill its constitutional duty by rejecting this inadequate EIS and preventing further degradation of these sacred lands and waters. The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental

issue but a matter of cultural perpetuation, water security, and intergenerational justice for all of Hawai‘i Island.

Me ke aloha ‘āina,

[Your Name]

[Your town or your island]

(Rewrite as a Hawai‘i state law expert)

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. I respectfully urge the BLNR to exercise its statutory authority under HRS § 343-5 to reject this legally deficient document. As the body charged with fulfilling the State's constitutional mandate to "conserve and protect Hawai‘i's natural beauty and all natural resources" (Article XI, Section 1), the Board has not just the authority but the affirmative legal obligation to deny acceptance of an EIS that so fundamentally fails to meet the standards established in HAR § 11-200.1-13 for content requirements of environmental impact statements.

Of particular concern is the EIS's alarming failure to adequately address threats to Ka Wai Kapu a Kāne - our sacred water sources. Research has confirmed the existence of an extensive freshwater aquifer beneath Pōhakuloa at approximately 4,500 feet elevation, which has been described as "one of the most pristine aquifers in Hawai‘i" that is "the deepest, the widest" on the island, vital to our water security and cultural practices. The continued use of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these irreplaceable water sources. In 2022, the Army admitted in draft environmental documents that their activities "may have impacts on soils within the confines of the State-owned land; however, potential impacts to water resources could reach beyond the State-owned land to include the regional aquifers and watersheds." The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Red Hill water crisis demonstrates how catastrophic military contamination of our aquifers can be, and we simply cannot risk such gross negligence at Pōhakuloa.

This EIS is legally deficient under HAR § 11-200.1-24, which explicitly requires that an EIS "shall contain a summary of unresolved issues and either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the issues." The Army's proposal is located within Conservation District lands, subject to DLNR's exclusive jurisdiction under HRS § 183C-3, where permissible uses are strictly limited under HAR § 13-5. The Army's activities - including live-

fire training and bombing - constitute a violation of HAR § 13-5-30(c)(4), which requires that the proposed land use "will not cause substantial adverse impact to existing natural resources within the surrounding area, community, or region."

The Office of Conservation and Coastal Lands has already determined that the Army's claim of compliance with conservation district rules was "an incorrect statement," creating a legal bar to acceptance of this EIS. Furthermore, under HRS § 171-58, which governs the disposition of water resources on public lands, the Board is obligated to protect groundwater resources as public trust assets. The Hawai'i Supreme Court in *Waiāhole I* (94 Hawai'i 97, 9 P.3d 409) established that the public trust doctrine places an affirmative duty on the Board to ensure "the continued availability and existence of its water resources for present and future generations." The 2019 *Kahaulelio v. DLNR* ruling (144 Hawai'i 124, 439 P.3d 111) further clarified that the State has breached its trust duties through its failure to properly monitor and protect the lands at Pōhakuloa, creating a binding precedent that compels rejection of this EIS.

The Hawai'i Supreme Court in *Kahaulelio v. DLNR* (2019) unequivocally affirmed that the State has "the highest duty to preserve and maintain the trust lands," establishing a heightened standard of review for any action affecting ceded lands. This duty is not merely aspirational but creates a legal obligation under Article XII, Section 4 of the Hawai'i Constitution. The court recognized the BLNR's duties as "proactive and preventative" – meaning the Board must anticipate and prevent harm before it occurs, not merely respond to it. Under HRS § 205A-4, which mandates that all agencies "enforce the objectives and policies" of the coastal zone management program, the Board must ensure the protection of aquifer resources that ultimately connect to coastal ecosystems.

The Army's documented history of environmental negligence – nearly 900 recorded fires since 1975, burning of 20,000 acres of critical habitat, and depositing unexploded ordnance – constitutes prima facie evidence of non-compliance with HAR § 13-5-30(c)(8), which requires that "the proposed land use will not be materially detrimental to the public health, safety, and welfare." Under the precautionary principle, firmly established in Hawai'i environmental jurisprudence by the Supreme Court in the *Waiāhole* cases and reaffirmed in *In re 'Īao Ground Water* (128 Hawai'i 228, 287 P.3d 129), the Board has a legal obligation to reject activities that pose potential threats to public trust resources when scientific uncertainty exists. The Board's failure to reject this EIS would itself constitute an independent breach of trust duties actionable under HRS § 607-25, which provides for citizen suits to enforce environmental laws. I therefore urge this Board to fulfill its constitutional and statutory obligations by rejecting this legally deficient EIS, as anything less would constitute an abdication of your sworn duties as trustees of our public lands and waters.

Furthermore, I respectfully remind the Board that HRS § 171-58(g) requires that any lease of water rights must ensure that the use "is consistent with the public interest and the State water resource strategy, including the protection of stream waters for instream uses." The Army's proposal fails to adequately address its compliance with this statutory requirement. Given the weight of these legal authorities, I submit that the Board not only has the discretion to reject this EIS but faces potential legal liability under the public trust doctrine if it approves an EIS that so clearly fails to safeguard our most precious natural resources.

Me ka ha'aha'a, [Your Full Name] [Your Town or Island]

(Blend first 2 testimonies with legal testimony)

## Testimony in Opposition to the U.S. Army's Final Environmental Impact Statement for Pōhakuloa Training Area

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. I respectfully urge the BLNR to exercise its statutory authority under HRS § 343-5 to reject this legally deficient document. As the body charged with fulfilling the State's constitutional mandate to "conserve and protect Hawai'i's natural beauty and all natural resources" (Article XI, Section 1), the Board has not just the authority but the affirmative legal obligation to deny acceptance of an EIS that so fundamentally fails to meet the standards established in HAR § 11-200.1-13 for content requirements of environmental impact statements.

Of particular concern is the EIS's alarming failure to adequately address threats to Ka Wai Kapu a Kāne - our sacred deep aquifer resources. Research has confirmed the existence of an extensive freshwater aquifer beneath Pōhakuloa at approximately 4,500 feet elevation, which has been described as "one of the most pristine aquifers in Hawai'i" that is "the deepest, the widest" on the island, vital to our water security and cultural practices. The continued use of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these irreplaceable water sources. In 2022, the Army admitted in draft environmental documents that their activities "may have impacts on soils within the confines of the State-owned land; however, potential impacts to water resources could reach beyond the State-owned land to include the regional aquifers and watersheds." The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Red Hill water crisis demonstrates how catastrophic military contamination of our aquifers can be, and we simply cannot risk another such disaster at Pōhakuloa.

This EIS is fundamentally incomplete and legally deficient under HAR § 11-200.1-24, which explicitly requires that an EIS "shall contain a summary of unresolved issues and either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the issues." It lacks essential biological and cultural surveys while ignoring impacts to adjacent federal lands as required under state law. The Army's proposal is located within Conservation District lands, subject to DLNR's exclusive jurisdiction under HRS § 183C-3, where permissible uses are strictly limited under HAR § 13-5. The Army's activities - including live-fire training and bombing - constitute a violation of HAR § 13-5-30(c)(4), which requires that the proposed land use "will not cause substantial adverse impact to existing natural resources within the surrounding area, community, or region."

In 2022, Hawaii state agencies including the Department of Land and Natural Resources and the Office of Conservation and Coastal Lands submitted "blistering comments" on the Army's draft EIS, identifying numerous adverse impacts to wildlife, archaeological assets, and cultural resources. The Office of Conservation and Coastal Lands was "alarmed" at the number of

dump sites at Pōhakuloa and stated bluntly that the Army's claim of compliance with conservation district rules was "an incorrect statement," creating a legal bar to acceptance of this EIS. Furthermore, under HRS § 171-58, which governs the disposition of water resources on public lands, the Board is obligated to protect groundwater resources as public trust assets. The Hawai'i Supreme Court in *Waiāhole I* (94 Hawai'i 97, 9 P.3d 409) established that the public trust doctrine places an affirmative duty on the Board to ensure "the continued availability and existence of its water resources for present and future generations."

The 2019 Hawaii Supreme Court ruling (*Kahaulelio v. DLNR*) unanimously found that the State breached its trust duties by failing to properly monitor and inspect the lands at Pōhakuloa, allowing the area to fall "into ruin" through neglect and military misuse. This landmark ruling emphatically established that military usage of Pōhakuloa is fundamentally incompatible with the land's conservation district designation and creates a binding precedent that compels rejection of this EIS.

The Hawai'i Supreme Court in *Kahaulelio v. DLNR* (2019) unequivocally affirmed that the State has "the highest duty to preserve and maintain the trust lands," establishing a heightened standard of review for any action affecting ceded lands. This duty is not merely aspirational but creates a legal obligation under Article XII, Section 4 of the Hawai'i Constitution rooted in the constitutional obligation to *mālama ʻāina*. The court recognized the DLNR's duties as "proactive and preventative" – meaning the Board must anticipate and prevent harm before it occurs, not merely respond to it. Under HRS § 205A-4, which mandates that all agencies "enforce the objectives and policies" of the coastal zone management program, the Board must ensure the protection of aquifer resources that ultimately connect to coastal ecosystems.

The Army's documented history of environmental negligence is extensive – nearly 900 recorded fires since 1975 attributed to military actions, the burning of nearly 20,000 acres including critical habitat for native flora and fauna, and the ongoing threat from unexploded ordnance – constitutes *prima facie* evidence of non-compliance with HAR § 13-5-30(c)(8), which requires that "the proposed land use will not be materially detrimental to the public health, safety, and welfare." Furthermore, researchers have discovered that the Army has expressed interest in tapping into the aquifer beneath Pōhakuloa not primarily for environmental protection, but to save money on hauling water for troops - revealing their true priorities regarding our precious water resources.

Under the precautionary principle, firmly established in Hawai'i environmental jurisprudence by the Supreme Court in the *Waiāhole* cases and reaffirmed in *In re ʻĪao Ground Water* (128 Hawai'i 228, 287 P.3d 129), the Board has a legal obligation to reject activities that pose potential threats to public trust resources when scientific uncertainty exists. The Board's failure to reject this EIS would itself constitute an independent breach of trust duties actionable under HRS § 607-25, which provides for citizen suits to enforce environmental laws. I therefore urge this Board to fulfill its constitutional and statutory obligations by rejecting this legally deficient EIS, as anything less would constitute an abdication of your sworn duties as trustees of our public lands and waters.

Furthermore, I respectfully remind the Board that HRS § 171-58(g) requires that any lease of water rights must ensure that the use "is consistent with the public interest and the State water resource strategy, including the protection of stream waters for instream uses." The Army's proposal fails to adequately address its compliance with this statutory requirement. Given the weight of these legal authorities, I submit that the Board not only has the discretion to reject this EIS but faces potential legal liability under the public trust doctrine if it approves an EIS

that so clearly fails to safeguard our most precious natural resources.

The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental issue but a matter of cultural perpetuation, water security, and intergenerational justice for all of Hawai‘i Island.

Me ke aloha ‘āina,

[Your Full Name] [Your Town or Island]

(After reading the EIS [only could find summaries], further strengthen the blended testimony)

Testimony in Opposition to the U.S. Army's Final Environmental Impact Statement for Pōhakuloa Training Area

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of up to 22,750 acres at Pōhakuloa Training Area. I respectfully urge the BLNR to exercise its statutory authority under HRS § 343-5 to reject this legally deficient document. As the body charged with fulfilling the State's constitutional mandate to "conserve and protect Hawai‘i's natural beauty and all natural resources" (Article XI, Section 1), the Board has not just the authority but the affirmative legal obligation to deny acceptance of an EIS that so fundamentally fails to meet the standards established in HAR § 11-200.1-13 for content requirements of environmental impact statements.

Inadequate Protection of Ka Wai Kapu a Kāne - Our Sacred Water Resources

Of paramount concern is the EIS's alarming failure to adequately address threats to Ka Wai Kapu a Kāne - our sacred deep aquifer resources. Research has confirmed the existence of an extensive freshwater aquifer beneath Pōhakuloa at approximately 4,500 feet elevation, which has been described as "one of the most pristine aquifers in Hawai‘i" that is "the deepest, the widest" on the island, vital to our water security and cultural practices. The continued use of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these irreplaceable water sources.

In 2022, the Army admitted in draft environmental documents that their activities "may have impacts on soils within the confines of the State-owned land; however, potential impacts to water resources could reach beyond the State-owned land to include the regional aquifers and watersheds." The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Red Hill water crisis demonstrates how catastrophic military contamination of our aquifers can be, and we simply cannot risk another such disaster at Pōhakuloa.

Confirmed Depleted Uranium Contamination

The Army initially denied using depleted uranium (DU) in Hawai'i, but in 2007 was forced to confirm the presence of DU at both Schofield Barracks and Pōhakuloa Training Area. The DU originated from the Davy Crockett Weapon System, a battlefield nuclear-capable weapon tested in Hawai'i in the 1960s. When DU rounds explode or are disturbed by ongoing live-fire exercises, uranium particles can become aerosolized and carried by wind across Hawai'i Island. With a half-life of 4.5 billion years, this contamination represents a permanent threat to public health and water resources.

The Hawai'i County Council passed Resolution 639-08 in July 2008 calling for a halt to activities at Pōhakuloa that create dust until there is an assessment and cleanup of the DU. Yet the Army has failed to comply with this resolution and has continued live-fire training. The Army's Final EIS acknowledges that under all proposed alternatives (1, 2, and 3), "significant adverse impacts could occur on land use (land tenure), biological resources, cultural practices, and environmental justice," but provides inadequate mitigation measures.

#### Incomplete and Inadequate Documentation of Unexploded Ordnance

The EIS fails to adequately address the Army's legal obligation to clear unexploded ordnance (UXO) from the training area. A Hawai'i judge has previously ordered state officials to submit a plan for monitoring and inspecting ordnance cleanup at Pōhakuloa, finding that the Army had breached its lease obligations by not cleaning up UXO. The Department of Land and Natural Resources has specifically noted that "all lands excluded from the lease renewal must be swept for unexploded ordnance and other hazardous materials before returning to the Department of Land and Natural Resources," yet the EIS does not provide a comprehensive plan for this essential remediation.

According to the EPA, the Department of Defense "suspects or acknowledges contamination by military munitions of an estimated 15 million acres of land" nationwide, with cleanup costs estimated between \$8 billion and \$35 billion. The Army's EIS grossly underestimates the scope, cost, and timeline required for proper remediation of Pōhakuloa.

#### Legal Deficiencies of the EIS

This EIS is fundamentally incomplete and legally deficient under HAR § 11-200.1-24, which explicitly requires that an EIS "shall contain a summary of unresolved issues and either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the issues." The Army's proposal is located within Conservation District lands, subject to DLNR's exclusive jurisdiction under HRS § 183C-3, where permissible uses are strictly limited under HAR § 13-5. The Army's activities - including live-fire training and bombing - constitute a violation of HAR § 13-5-30(c)(4), which requires that the proposed land use "will not cause substantial adverse impact to existing natural resources within the surrounding area, community, or region."

In 2022, Hawaii state agencies including the Department of Land and Natural Resources and the Office of Conservation and Coastal Lands submitted "blistering comments" on the Army's draft EIS, identifying numerous adverse impacts to wildlife, archaeological assets, and cultural resources. The Office of Conservation and Coastal Lands was "alarmed" at the number of dump sites at Pōhakuloa and stated bluntly that the Army's claim of compliance with conservation district rules was "an incorrect statement," creating a legal bar to acceptance of this EIS.



Furthermore, under HRS § 171-58, which governs the disposition of water resources on public lands, the Board is obligated to protect groundwater resources as public trust assets. The Hawai‘i Supreme Court in *Waiāhole I* (94 Hawai‘i 97, 9 P.3d 409) established that the public trust doctrine places an affirmative duty on the Board to ensure "the continued availability and existence of its water resources for present and future generations."

#### Binding Legal Precedent: *Kahaulelio v. DLNR* (2019)

The 2019 Hawaii Supreme Court ruling (*Kahaulelio v. DLNR*) unanimously found that the State breached its trust duties by failing to properly monitor and inspect the lands at Pōhakuloa, allowing the area to fall "into ruin" through neglect and military misuse. This landmark ruling emphatically established that military usage of Pōhakuloa is fundamentally incompatible with the land's conservation district designation and creates a binding precedent that compels rejection of this EIS.

The Hawai‘i Supreme Court unequivocally affirmed that the State has "the highest duty to preserve and maintain the trust lands," establishing a heightened standard of review for any action affecting ceded lands. This duty is not merely aspirational but creates a legal obligation under Article XII, Section 4 of the Hawai‘i Constitution rooted in the constitutional obligation to *mālama ‘āina*. The court recognized the BLNR's duties as "proactive and preventative" – meaning the Board must anticipate and prevent harm before it occurs, not merely respond to it.

Under HRS § 205A-4, which mandates that all agencies "enforce the objectives and policies" of the coastal zone management program, the Board must ensure the protection of aquifer resources that ultimately connect to coastal ecosystems.

#### Documented History of Environmental Negligence

The Army's documented history of environmental negligence is extensive – nearly 900 recorded fires since 1975 attributed to military actions, the burning of nearly 20,000 acres including critical habitat for native flora and fauna, and the ongoing threat from unexploded ordnance – constitutes *prima facie* evidence of non-compliance with HAR § 13-5-30(c)(8), which requires that "the proposed land use will not be materially detrimental to the public health, safety, and welfare."

Between 2012 and August 2024 alone, 96 fires were recorded on the parcel, burning approximately 19,328 acres. The Final EIS acknowledges that the wildfire risk will only increase due to "increased potential for drought from changes to regional temperatures and precipitation patterns due to climate change." Despite this, the Army has failed to implement adequate fire prevention and response measures.

Furthermore, researchers have discovered that the Army has expressed interest in tapping into the aquifer beneath Pōhakuloa not primarily for environmental protection, but to save money on hauling water for troops - revealing their true priorities regarding our precious water resources.

#### The Precautionary Principle and Public Trust Doctrine

Under the precautionary principle, firmly established in Hawai‘i environmental jurisprudence by the Supreme Court in the *Waiāhole* cases and reaffirmed in *In re 'Īao Ground Water* (128 Hawai‘i 228, 287 P.3d 129), the Board has a legal obligation to reject activities that pose

potential threats to public trust resources when scientific uncertainty exists. The Board's failure to reject this EIS would itself constitute an independent breach of trust duties actionable under HRS § 607-25, which provides for citizen suits to enforce environmental laws.

I therefore urge this Board to fulfill its constitutional and statutory obligations by rejecting this legally deficient EIS, as anything less would constitute an abdication of your sworn duties as trustees of our public lands and waters.

Furthermore, I respectfully remind the Board that HRS § 171-58(g) requires that any lease of water rights must ensure that the use "is consistent with the public interest and the State water resource strategy, including the protection of stream waters for instream uses." The Army's proposal fails to adequately address its compliance with this statutory requirement. Given the weight of these legal authorities, I submit that the Board not only has the discretion to reject this EIS but faces potential legal liability under the public trust doctrine if it approves an EIS that so clearly fails to safeguard our most precious natural resources.

The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental issue but a matter of cultural perpetuation, water security, and intergenerational justice for all of Hawai'i Island. If we have learned anything from the Red Hill water crisis, it should be that we cannot trust military assurances about protection of our water resources, and we cannot wait until after contamination has occurred to take action.

Me ke aloha 'āina,

[Your Full Name] [Your Town or Island]

(Update with new section that addresses the default approval concern)

Testimony in Opposition to the U.S. Army's Final Environmental Impact Statement for Pōhakuloa Training Area

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of up to 22,750 acres at Pōhakuloa Training Area. I respectfully urge the BLNR to exercise its statutory authority under HRS § 343-5 to reject this legally deficient document. As the body charged with fulfilling the State's constitutional mandate to "conserve and protect Hawai'i's natural beauty and all natural resources" (Article XI, Section 1), the Board has not just the authority but the affirmative legal obligation to deny acceptance of an EIS that so fundamentally fails to meet the standards established in HAR § 11-200.1-13 for content requirements of environmental impact statements.

## Inadequate Protection of Ka Wai Kapu a Kāne - Our Sacred Water Resources

Of paramount concern is the EIS's alarming failure to adequately address threats to Ka Wai Kapu a Kāne - our sacred deep aquifer resources. Research has confirmed the existence of an extensive freshwater aquifer beneath Pōhakuloa at approximately 4,500 feet elevation, which has been described as "one of the most pristine aquifers in Hawai'i" that is "the deepest, the widest" on the island, vital to our water security and cultural practices. The continued use of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these irreplaceable water sources.

In 2022, the Army admitted in draft environmental documents that their activities "may have impacts on soils within the confines of the State-owned land; however, potential impacts to water resources could reach beyond the State-owned land to include the regional aquifers and watersheds." The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Red Hill water crisis demonstrates how catastrophic military contamination of our aquifers can be, and we simply cannot risk another such disaster at Pōhakuloa.

### Confirmed Depleted Uranium Contamination

The Army initially denied using depleted uranium (DU) in Hawai'i, but in 2007 was forced to confirm the presence of DU at both Schofield Barracks and Pōhakuloa Training Area. The DU originated from the Davy Crockett Weapon System, a battlefield nuclear-capable weapon tested in Hawai'i in the 1960s. When DU rounds explode or are disturbed by ongoing live-fire exercises, uranium particles can become aerosolized and carried by wind across Hawai'i Island. With a half-life of 4.5 billion years, this contamination represents a permanent threat to public health and water resources.

The Hawai'i County Council passed Resolution 639-08 in July 2008 calling for a halt to activities at Pōhakuloa that create dust until there is an assessment and cleanup of the DU. Yet the Army has failed to comply with this resolution and has continued live-fire training. The Army's Final EIS acknowledges that under all proposed alternatives (1, 2, and 3), "significant adverse impacts could occur on land use (land tenure), biological resources, cultural practices, and environmental justice," but provides inadequate mitigation measures.

### Incomplete and Inadequate Documentation of Unexploded Ordnance

The EIS fails to adequately address the Army's legal obligation to clear unexploded ordnance (UXO) from the training area. A Hawai'i judge has previously ordered state officials to submit a plan for monitoring and inspecting ordnance cleanup at Pōhakuloa, finding that the Army had breached its lease obligations by not cleaning up UXO. The Department of Land and Natural Resources has specifically noted that "all lands excluded from the lease renewal must be swept for unexploded ordnance and other hazardous materials before returning to the Department of Land and Natural Resources," yet the EIS does not provide a comprehensive plan for this essential remediation.

According to the EPA, the Department of Defense "suspects or acknowledges contamination by military munitions of an estimated 15 million acres of land" nationwide, with cleanup costs estimated between \$8 billion and \$35 billion. The Army's EIS grossly underestimates the

scope, cost, and timeline required for proper remediation of Pōhakuloa.

### Legal Deficiencies of the EIS

This EIS is fundamentally incomplete and legally deficient under HAR § 11-200.1-24, which explicitly requires that an EIS "shall contain a summary of unresolved issues and either a discussion of how such issues will be resolved prior to commencement of the action, or what overriding reasons there are for proceeding without resolving the issues." The Army's proposal is located within Conservation District lands, subject to DLNR's exclusive jurisdiction under HRS § 183C-3, where permissible uses are strictly limited under HAR § 13-5. The Army's activities - including live-fire training and bombing - constitute a violation of HAR § 13-5-30(c)(4), which requires that the proposed land use "will not cause substantial adverse impact to existing natural resources within the surrounding area, community, or region."

In 2022, Hawaii state agencies including the Department of Land and Natural Resources and the Office of Conservation and Coastal Lands submitted "blistering comments" on the Army's draft EIS, identifying numerous adverse impacts to wildlife, archaeological assets, and cultural resources. The Office of Conservation and Coastal Lands was "alarmed" at the number of dump sites at Pōhakuloa and stated bluntly that the Army's claim of compliance with conservation district rules was "an incorrect statement," creating a legal bar to acceptance of this EIS.

Furthermore, under HRS § 171-58, which governs the disposition of water resources on public lands, the Board is obligated to protect groundwater resources as public trust assets. The Hawai'i Supreme Court in *Waiāhole I* (94 Hawai'i 97, 9 P.3d 409) established that the public trust doctrine places an affirmative duty on the Board to ensure "the continued availability and existence of its water resources for present and future generations."

### Binding Legal Precedent: *Kahaulelio v. DLNR* (2019)

The 2019 Hawaii Supreme Court ruling (*Kahaulelio v. DLNR*) unanimously found that the State breached its trust duties by failing to properly monitor and inspect the lands at Pōhakuloa, allowing the area to fall "into ruin" through neglect and military misuse. This landmark ruling emphatically established that military usage of Pōhakuloa is fundamentally incompatible with the land's conservation district designation and creates a binding precedent that compels rejection of this EIS.

The Hawai'i Supreme Court unequivocally affirmed that the State has "the highest duty to preserve and maintain the trust lands," establishing a heightened standard of review for any action affecting ceded lands. This duty is not merely aspirational but creates a legal obligation under Article XII, Section 4 of the Hawai'i Constitution rooted in the constitutional obligation to *mālama 'āina*. The court recognized the DLNR's duties as "proactive and preventative" – meaning the Board must anticipate and prevent harm before it occurs, not merely respond to it.

Under HRS § 205A-4, which mandates that all agencies "enforce the objectives and policies" of the coastal zone management program, the Board must ensure the protection of aquifer resources that ultimately connect to coastal ecosystems.

### Documented History of Environmental Negligence

The Army's documented history of environmental negligence is extensive – nearly 900

recorded fires since 1975 attributed to military actions, the burning of nearly 20,000 acres including critical habitat for native flora and fauna, and the ongoing threat from unexploded ordnance – constitutes prima facie evidence of non-compliance with HAR § 13-5-30(c)(8), which requires that "the proposed land use will not be materially detrimental to the public health, safety, and welfare."

Between 2012 and August 2024 alone, 96 fires were recorded on the parcel, burning approximately 19,328 acres. The Final EIS acknowledges that the wildfire risk will only increase due to "increased potential for drought from changes to regional temperatures and precipitation patterns due to climate change." Despite this, the Army has failed to implement adequate fire prevention and response measures.

Furthermore, researchers have discovered that the Army has expressed interest in tapping into the aquifer beneath Pōhakuloa not primarily for environmental protection, but to save money on hauling water for troops - revealing their true priorities regarding our precious water resources.

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Under the precautionary principle, firmly established in Hawai'i environmental jurisprudence by the Supreme Court in the Waiāhole cases and reaffirmed in *In re 'Īao Ground Water* (128 Hawai'i 228, 287 P.3d 129), the Board has a legal obligation to reject activities that pose potential threats to public trust resources when scientific uncertainty exists. The Board's failure to reject this EIS would itself constitute an independent breach of trust duties actionable under HRS § 607-25, which provides for citizen suits to enforce environmental laws.

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Furthermore, I respectfully remind the Board that HRS § 171-58(g) requires that any lease of water rights must ensure that the use "is consistent with the public interest and the State water resource strategy, including the protection of stream waters for instream uses." The Army's proposal fails to adequately address its compliance with this statutory requirement. Given the weight of these legal authorities, I submit that the Board not only has the discretion to reject this EIS but faces potential legal liability under the public trust doctrine if it approves an EIS that so clearly fails to safeguard our most precious natural resources.

The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental issue but a matter of cultural perpetuation, water security, and intergenerational justice for all of Hawai'i Island. If we have learned anything from the Red Hill water crisis, it should be that we cannot trust military assurances about protection of our water resources, and we cannot wait until after contamination has occurred to take action.

### Urging Explicit Rejection Rather Than Allowing Default Acceptance

I respectfully acknowledge the Board's significant workload and the complexities of this issue. However, I must emphasize that under Hawaii's environmental laws, if the Board does not make an explicit determination on the acceptance of a Final EIS within the 30-day review period, the document is deemed accepted by default. In a matter of such critical importance to

our islands' environment, water resources, and cultural heritage, allowing this EIS to be accepted through procedural default rather than substantive review would constitute a severe abdication of the Board's constitutional and statutory responsibilities to protect public trust resources.

Therefore, I strongly urge the Board to schedule a vote on this Final EIS before the 30-day deadline and to explicitly reject the document based on the substantial legal and scientific deficiencies outlined above. Failing to take explicit action, and thus allowing default acceptance, would not only undermine public confidence in the environmental review process but would potentially expose the Board to legal liability under the public trust doctrine as established in the Waiāhole and Kahaulelio cases.

Me ke aloha ‘āina,

[Your Full Name] [Your Town or Island]

(Re-read EIS summaries and see if I missed anything)

Testimony in Opposition to the U.S. Army's Final Environmental Impact Statement for Pōhakuloa Training Area

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of up to 22,750 acres at Pōhakuloa Training Area. I respectfully urge the BLNR to exercise its statutory authority under HRS § 343-5 to reject this legally deficient document. As the body charged with fulfilling the State's constitutional mandate to "conserve and protect Hawai‘i's natural beauty and all natural resources" (Article XI, Section 1), the Board has not just the authority but the affirmative legal obligation to deny acceptance of an EIS that so fundamentally fails to meet the standards established in HAR § 11-200.1-13 for content requirements of environmental impact statements.

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In 2022, the Army admitted in draft environmental documents that their activities "may have impacts on soils within the confines of the State-owned land; however, potential impacts to water resources could reach beyond the State-owned land to include the regional aquifers and watersheds." The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Red Hill water crisis demonstrates how catastrophic military contamination of our aquifers can be, and we simply cannot risk another such disaster at Pōhakuloa.

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Under HRS § 205A-4, which mandates that all agencies "enforce the objectives and policies" of the coastal zone management program, the Board must ensure the protection of aquifer resources that ultimately connect to coastal ecosystems.

#### Army's Own Final EIS Acknowledges Significant Adverse Impacts

The Army's own Final Environmental Impact Statement (April 2025) explicitly acknowledges that under all proposed alternatives (Alternatives 1, 2, and 3), "significant adverse impacts could occur on land use (land tenure), biological resources, cultural practices, and environmental justice." While the Army claims to have "identified measures in the Final EIS to mitigate these adverse impacts," these proposed mitigations are wholly inadequate given the scale and severity of the potential damage.

The Army's preferred Alternative 2 (Modified Retention) seeks to retain approximately 19,700 acres of state land, which is only about 14% less than the current lease. This minor reduction fails to meaningfully address the fundamental incompatibility of military training activities with conservation district lands. The Army's mitigation proposals largely consist of procedural measures rather than substantive protections for water resources, cultural sites, and native



ecosystems.

Notably, the Final EIS admits that the No-Action Alternative (not renewing the lease) would have "significant beneficial impacts on land use, cultural practices, and environmental justice" - a clear admission that the military's current and proposed future use of these lands is harmful to Hawaii's environment, culture, and people.

#### Documented History of Environmental Negligence

The Army's documented history of environmental negligence is extensive – nearly 900 recorded fires since 1975 attributed to military actions, the burning of nearly 20,000 acres including critical habitat for native flora and fauna, and the ongoing threat from unexploded ordnance – constitutes prima facie evidence of non-compliance with HAR § 13-5-30(c)(8), which requires that "the proposed land use will not be materially detrimental to the public health, safety, and welfare."

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Furthermore, researchers have discovered that the Army has expressed interest in tapping into the aquifer beneath Pōhakuloa not primarily for environmental protection, but to save money on hauling water for troops - revealing their true priorities regarding our precious water resources.

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I therefore urge this Board to fulfill its constitutional and statutory obligations by rejecting this legally deficient EIS, as anything less would constitute an abdication of your sworn duties as trustees of our public lands and waters.

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Island. If we have learned anything from the Red Hill water crisis, it should be that we cannot trust military assurances about protection of our water resources, and we cannot wait until after contamination has occurred to take action.

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Therefore, I strongly urge the Board to schedule a vote on this Final EIS before the 30-day deadline and to explicitly reject the document based on the substantial legal and scientific deficiencies outlined above. Failing to take explicit action, and thus allowing default acceptance, would not only undermine public confidence in the environmental review process but would potentially expose the Board to legal liability under the public trust doctrine as established in the Waiāhole and Kahaulelio cases.

Me ke aloha ‘āina,

Gregory Keahi Camara, Waiākea Uka, Hawai‘i

**From:** [Keahi & Jordan Camara](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] PTA EIS Rejection  
**Date:** Thursday, May 8, 2025 8:30:07 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area. I urge the BLNR to reject this deeply flawed document that fails to adequately address critical concerns about our precious natural resources.

Of particular concern is the EIS's alarming failure to address threats to Ka Wai Kapu a Kāne - our sacred water sources. The continued use of live-fire training and bombing in this sensitive area poses an unacceptable risk of contamination to these irreplaceable water sources that sustain life throughout Hawai'i Island. The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Army's EIS provides no sufficient plan to prevent or mitigate these potentially devastating impacts.

This EIS is fundamentally incomplete, lacking essential biological and cultural surveys while ignoring impacts to adjacent federal lands as required under state law. It fails to address threats to endangered species, cultural resources and practices, and turns a blind eye to the ongoing accumulation of dangerous munitions on public land. As stated in your own DLNR staff submittal, the Army has repeatedly refused to address serious concerns throughout the EIS process, demonstrating a troubling disregard for Hawai'i's Environmental Protection Act and the well-being of these lands and waters.

As affirmed by the Hawai'i Supreme Court in *Kahaulelio v. DLNR* (2019), the State has "the highest duty to preserve and maintain the trust lands" rooted in the constitutional obligation to mālama 'āina. I respectfully remind the BLNR of this sacred duty and urge you to reject this inadequate EIS. Further, I ask that any future decision-making regarding Pōhakuloa be held on Hawai'i Island, allowing those most directly impacted to speak to decision makers about their 'āina and moku. The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental issue but a matter of cultural perpetuation and intergenerational justice.

Me ke aloha 'āina,

Jordan Camara

Waiākea Uka, Hilo, Hawai'i

**From:** [Kelsey Carlos-Keliikipi](#)  
**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 11:31:09 AM

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Aloha Members of the Board of Land and Natural Resources,

My name is Kelsey Carlos-Keliikipi, 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.

Pohakuloa is not simply land; it is living ancestor, sacred 'āina, where the bones of kupuna lie between Maunakea and Maunaloa.

This is the heart of Hawaii Island, once safeguarded as Hawaiian Kingdom crown and government lands but then stolen by a regime led by settler sugar plantation oligarchs, then "ceded" to the United States and now carved and poisoned by decades of U.S. military control. Since World War II, the U.S. Marines have used Pōhakuloa as a proving ground, linking it to the campaigns of Iwo Jima, Saipan, and to Camp Tarawa. But the war did not end; it was institutionalized, absorbed into the machinery of the military-industrial complex, and repackaged as permanent occupation after the war.

Today, the bombs still fall, and the poisons run deep.

Depleted uranium, unexploded ordnance, and chemical residues seep into the earth, threatening the aquifer that sustains life on Hawaii Island. Endangered species like the palila fight for survival in a landscape shattered by artillery, while sacred sites tied to 'Umi-a-Liloa, one of the island's most revered chiefs, stand desecrated or fenced away.

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,

Kelsey Carlos-Keliikipi  
Wai‘anae, O‘ahu

**From:** [nomi carmona](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Oppose Agenda Item D-1  
**Date:** Thursday, May 8, 2025 11:46:12 AM

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Aloha,

I stand in opposition to Agenda Item D-1.

The Army's refusal to consult cultural practitioners is unacceptable and shows bad faith.

Please reject this FEIS and place a priority on legitimate consultation with Hawaiian cultural practitioners.

Mahalo,

Nomi Carmona

**From:** [Hi'ilei Casco](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 9:29:02 AM

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

My name is Hi'ilei Casco and I am from Wai'ehu, Lāhaina, and Kaupō, Maui. I am also a licensed attorney in Hawai'i with certificates in Native Hawaiian Law and Environmental Law. I respectfully urge you to do the right thing and reject the clearly insufficient FEIS in Item D-1.

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

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

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

Mahalo nui for the opportunity to testify.

Hi'ilei K. Casco

**From:** [Stacey Casco](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 10:18:56 AM

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

My name is Stacey Ann L. Casco and I am from Kaupō, Maui. 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,



Stacey Ann L. Casco, Resource Manager  
Joseph & Josephines LLC  
[www.josephinesmaui.com](http://www.josephinesmaui.com)  
(808) 281-8047



**From:** [ayla castillo](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] TESTIMONY FOR AGENDA ITEM D-1  
**Date:** Thursday, May 8, 2025 10:03:31 AM

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Aloha e Board Members,

I am writing to express my strong opposition to agenda item D.1. I strongly urge you to vote against the acceptance of the FEIS that the US Army submitted on April 18 before the 30 day deadline has passed. Allowing such a careless and egregious Environmental Impact Statement to be accepted will erode accountability and transparency in the management of lands that are crucial to our communities, natural resources, and cultural practitioners.

The FEIS that is being proposed by the Army is just as incomplete as the original draft that was proposed two years ago. The Army has failed to address key concerns such as cumulative environmental impact, the impact on the water table not only from toxic run off such as lead, depleted uranium, and white phosphorus but also the impact of bombing a central water aquifer for the last 60 years. Other concerns that have been voiced many times include the cultural impact on Kanaka Maoli being forcibly dispossessed from THEIR energetic piko, cumulative impacts that the so called training within Pohakuloa has had on endangered species which the Army is obligated to mitigate, the UXO in Pohakuloa and the Army's inability to clean up or restore any of the occupied lands to their original conditions, not to mention that to the public's knowledge, the Army has failed to pay the rental fee of one dollar for 65 years.

The Army's failure to properly address any of these issues puts their disregard for the rights of Kanaka Maoli and their obligation to malama aina as the current tenant on full display. This Board therefore, has the RESPONSIBILITY of safeguarding the lands that are held in the trust of the State for the benefit of the people of Hawaii. I ask you now: how does the bombing of our land, the poisoning of our air and water, and the disconnection from our iwi kupuna and sacred sites benefit anybody, be they Kanaka or haole?

I wish to also strongly emphasize that the Army's irreverent destruction of our sacred spaces here in Hawaii Nei is deeply reminiscent of the illegitimate state of Israel's destruction of Gaza, Palestine. I have no doubt that if it were allowed, all branches of the US occupational military would play whatever war games and drop whatever bombs suited them at any time with impunity, much as we see happen every two years with RIMPAC. The people of Hawaii would surely benefit from clean waters, lands and air, and we all know that the military will never provide those things since they are in direct opposition to the function of the US Military Industrial Complex. The time to end the destruction and desecration has long since passed, but it is never too late to uphold morality and ethics over profit and imperialism.

In closing, I strongly urge the Board to remember the Hawai'i State Supreme Court determination that the State of Hawai'i has an obligation to uphold the principle of "mālama 'āina" and ensure the protection and stewardship of the lands entrusted to its care, including those leased to the military. The Board must take this kuleana seriously and vote no on agenda item D.1.

Moving forward, it is the demand of Hawaiian people that Board meetings concerning this issue be held ON Hawaii nui instead of putting the burden of travel onto kupuna, Kanaka, and other concerned residents. This burden is undue and while written and virtual testimony is an option, we all know that those are not the equivalent of addressing the Board alo i ke alo. If the Army can have their scoping meetings in Waimea, then surely the State department dedicated to the management of our lands and waters can find a way to allow the people of Hawaii nui to properly address this issue.

**From:** [Eleven Castro \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:59:20 AM

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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,Ulu

Just like we did on Kaho'olawe, Hawaiian practitioners have been engaging in Makahiki Ceremonies for almost a decade now to bring peace and fertility to Pōhakuloa.

**From:** [Kanoa Castro](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony: Pohakuloa Lease  
**Date:** Thursday, May 8, 2025 8:14:32 AM

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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,  
Rand Kanoa Castro  
Waimea, Moku o Keawe

**From:** [Napuaʻiʻi Chan \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:07:28 AM

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## **We stopped the bombing of Kahoʻolawe, now it's time to stop the bombing of Pōhakuloa!**



## **Stop the Desecration of Pōhakuloa, Urge BLNR to reject the Army's EIS!**

This Friday, May 9th at 9am the Board of Land and Natural Resources (BLNR) will convene for 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 (agenda item D1). The Army is seeking the renewal of a 65 year lease for a military training site on Hawaiʻi Island, which is set to expire in August, 2029.

**It is critical that the BLNR reject the current Army EIS.**

Please submit written testimony by May 8th, at 9am and if you are able, provide oral testimony in person or at the BLNR hearing this Friday, May 9th at 9am to urge the BLNR to reject the Army's EIS. Video testimony via zoom is also available.

### ***Why Should the BLNR Reject the Army's EIS?***

Inadequate Environmental and Cultural Impact Analysis:

The EIS is inadequate in addressing the environmental and cultural impacts to the area. Pōhakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawaiʻi's most endangered species. The Army has not demonstrated the capacity or will to serve as a proper steward of this land.

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.

Furthermore, the Army EIS does not provide a sufficient plan for mitigating the environmental and cultural impacts. Given the military's horrendous track record of cleaning up military debris and caring for the site, it is unrealistic to expect the military to comply with the requirements of a conservation district.

***The State has a Constitutional Obligation to Mālama 'Āina:***

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

In Kahaulelio v. DLNR, 2019, the Hawai'i Supreme Court found that the State of Hawai'i had 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 timely action after learning of possible contamination or violations; and document its efforts and provide transparency to the public.

**Concerns Over Depleted Uranium Contamination:**

The presence of depleted uranium in the soil at Pōhakuloa is consistently churned up and aerosolized during live fire exercises and blown across the island. Exposure to depleted uranium is linked to cancer and many other negative health impacts.

## Military Use Conflicts with Conservation Land Use Designation

It is hard to conceive of any ongoing military use of the site that would be compatible with the site's designation as a conservation district. The proposed military uses of this site are simply incompatible with the conservation designation. Ongoing live-fire and bombing in the area threaten the native flora, fauna and cultural resources of the area, including some of Hawaii's most endangered species. The EIS does not provide specific or adequate mitigation measures to prevent impacts to the critical habitat or culturally significant sites.

## What You Can Do to Protect Pōhakuloa

To provide written testimony:

Submit written testimony via e-mail to [blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov) by May 8th at 9am, below is sample testimony, please personalize as you see fit.

To provide in-person testimony:

Attend live at 1151 Punchbowl St. Room 132 (Kalanimoku Building), Honolulu, Hawai'i.

Please arrive at least fifteen (15) minutes prior to the meeting start time in order to add your name to the sign-in sheet.

To provide video testimony:

Send your request to [blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov). Include your name and the agenda item on which you would like to testify (D1). Once your request has been received, you will receive an email with the Zoom link. Requests may be made during the meeting.

LIVE STREAM: <https://www.youtube.com/live/oWZU3uaHxp4>

## Sample Testimony:

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,



Burdie Chan

Posted by HAPA May 5, 2025!



Just like we did on Kaho‘olawe, Hawaiian practitioners have been engaging in Makahiki Ceremonies for almost a decade now to bring peace and fertility to Pōhakuloa.


P.O. Box 431, Hilo, Hawai‘i

96721

(808) 769-4646

Share on social



Check out our website — 

**From:** [Karen Chan](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Rejection of Army's EIS  
**Date:** Thursday, May 8, 2025 8:30:46 AM

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Hello,

The Army's EIS needs to be rejected. The inadequate Environmental and Cultural Impact Analysis has no sufficient plan to mitigate impacts to cultural and natural resources. The concerns over the depleted uranium on site have gone unaddressed and military usage of this area is not conducive to conservation. The Army has burned nearly 20,000 acres of this land, destroying native flora and fauna which is valuable habitat for the world's most endangered species. This "analysis" has countless gaps and is wholly unacceptable. Please reject it.

Thank you,  
Karen Chan

**From:** [Karen Chan](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Re: Rejection of Army's EIS  
**Date:** Thursday, May 8, 2025 9:27:12 AM

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Forgot to add that I am a resident of Honolulu, HI

On Thu, May 8, 2025 at 8:30 AM Karen Chan <[karenmc@hawaii.edu](mailto:karenmc@hawaii.edu)> wrote:

Hello,

The Army's EIS needs to be rejected. The inadequate Environmental and Cultural Impact Analysis has no sufficient plan to mitigate impacts to cultural and natural resources. The concerns over the depleted uranium on site have gone unaddressed and military usage of this area is not conducive to conservation. The Army has burned nearly 20,000 acres of this land, destroying native flora and fauna which is valuable habitat for the world's most endangered species. This "analysis" has countless gaps and is wholly unacceptable. Please reject it.

Thank you,  
Karen Chan

**From:** [Umi Ching](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1 testimony  
**Date:** Thursday, May 8, 2025 8:15:33 AM

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

My name is Umi and I am a kanaka maoli from slopes of Mauna Kea namely Kainehe, 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.

Me ke aloha,  
Umi a Liloa Ching-Nakama

**From:** [jacob.chinn](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:20:12 AM

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

My name is Jacob Chinn 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,  
Jacob Chinn

8 Mei 2025

Dear Board of Land and Natural Resources,

I am writing in **strong opposition** to the lease renewal and EIS of what is currently the United States Army Pōhakuloa Training Area on Hawai'i island. The reasons are as follows: Lack of inclusion of historical items (funerary objects in particular) in the EIS, continued environmental degradation and displacement of endangered species, and overall harm to the environment and natural resources.

My name is Brissa Christophersen and I am a research associate at the Maui Bird Conservation Center and kama'āina of Maui and a lineal descendant from 'ohana on Kaua'i and Hawai'i islands. I am testifying as a citizen of Hawai'i and not on behalf of the organization I work for. At the Maui Bird Conservation Center we have worked tirelessly over many years to rear Palila in our conservation breeding program due to their declining numbers in their native habitat, which are the slopes of Mauna Kea. Major threats for the Palila are infectious avian disease and habitat loss and degradation, which is directly linked to the use of Pōhakuloa Training Area as a space for open live fire and weapon practice. If this lease were to be reapproved in 2029, there may not be hope for the Palila, which is estimated to have a remaining wild population of less than 700; which should be alarming. By not approving this lease renewal, there would be greater opportunity to resist extinction and prevent critically endangered species from disappearing from the landscape forever.

Additionally, this lease should not be renewed because of the lack of inclusion of historical items in the Environmental Impact Statement provided for the Pōhakuloa Training Area. It is disappointing that federal agencies continue to lie on public records—this has dissolved the trust that the public has (if any at all) with the government to protect our cultural and natural resources. This also includes protecting the aquifer below Pōhakuloa; the continued pollution and bombing of these sites continue to degrade these resources and contaminate drinking water for the public and native ecosystems that rely on this water.

Again, I am urging your board to **REJECT the Army's FINAL EIS and do not approve their lease renewal**. The activities that this agency has been conducting while leasees are not conclusive to supporting conservation and preservation of endangered species, cultural resources, or natural resources.

Mālama,

Brissa Christophersen

**From:** [Barryn Chun](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [HAA Honolulu](#)  
**Subject:** [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 8:44:51 AM

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Aloha Chair Chang and Members of the Board,

My name is Barryn Chun, 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,

Barryn Chun  
Kane'ohe, O'ahu  
Hui Aloha 'Āina o Honolulu



**From:** [Valerie](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT the Army's Final EIS, Protect Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:03:11 AM

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Aloha mai kākou,

I urge you to reject the Army's final EIS. Pōhakuloa is Hawaiian land and should no longer be desecrated by U.S. militarism. The U.S. Army is responsible for immeasurable damage to our lands and water with no plans for clean up.

Despite the U.S. Army's acknowledgement of widespread contamination, it has made no plans to assess the extent of the damage nor to clean it up and restore the lands. The U.S. Army's lack of comprehensive assessment means that there is no evidence the contamination has not spread into water or ecosystems and, furthermore, the U.S. Army does not share safety procedures or spill data, effectively erasing access to critical data that directly affects the public.

The final EIS evades Hawai‘i law by ignoring cumulative impacts of the U.S. Army's damage which include increased risk of fire, harm to endangered species, and climate destruction.

Ke aloha nō,  
Valerie

| Valerie J. Clack | 46-040 Konane Place #3817 Kanehoe, HI 96740 | (808) 989-2957 |

**From:** [mike clark](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 10:39:11 AM

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Please immediately discontnue using Puhakola area for weapons training.

Sincerely

Michael Dan K. Clark

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

**From:** [Kalohi Clift \(2027\)](#)  
**To:** [DLNR.BLNR.Testimony](#); [Kauai Naniolo](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, May 8, 2025 8:52:36 AM

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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 properly steward this land, and the FEIS fails to address these concerns meaningfully.

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,  
Ronnie Clift  
from Halau Ku Mana



**From:** [Beth Coffey](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 11:07:32 AM

---

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

My name is Beth Coffey and I am from Ewa Beach, O'ahu. 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,

Beth Coffey



UNITED STATES MARINE CORPS  
MARINE CORPS BASE HAWAII  
BOX 63002  
KANELOE BAY, HAWAII 96863-3002

5 May 25

Chairperson Dawn N. S. Chang  
DLNR Main Office Kalanimoku Building  
1151 Punchbowl St. Honolulu, HI 96813

SUBJECT: Support for Approval of the Final EIS for Pōhakuloa Training Area

Aloha Chair and Members of the Board,

I am writing in strong support for the acceptance of the Final Environmental Impact Statement (EIS) for the U.S. Army's continued use of state-owned lands at Pōhakuloa Training Area (PTA) on Hawai'i Island. I respectfully urge the Board to review and approve the Final EIS, recognizing the critical role PTA plays in advancing national security, supporting our local communities, and protecting Hawai'i's unique cultural and environmental resources.

PTA is critical to the training and readiness of the Marines who are responsible for protecting the Indo-Pacific area of operations. The scale, geographic conditions, and infrastructure at PTA enable training which cannot be replicated at any other site in the mid-Pacific. As Marine units progress towards deployment, PTA provides the opportunity to integrate individual skills and learn to operate together as a team, under realistic conditions, and at a realistic scale. For decades, PTA has served as the "last stop" for Marines to prepare before deploying forward into harm's way. The foundational value of this training to deterring aggression and maintaining peace within the region cannot be overstated.

We acknowledge the impact that live fire training has on the island, as well as the deep responsibility we bear as both stewards of the land and members of the community. We also acknowledge that through history, the military's execution of these responsibilities has been imperfect. We earnestly strive to make decisions and act in a manner worthy of our responsibilities as both defenders of the nation and stewards of the land, and eagerly seek the opportunity to engage more deeply to this end.

Economically, the continued use of PTA supports local jobs, contracts, and small businesses, providing both direct and indirect benefits to Hawai'i Island and the state as a whole. Retaining access to these training lands strengthens not only our defense capabilities, but also Hawai'i's economic resilience.

I respectfully urge the Board to approve the Final EIS and recognize that a balanced approach—one that supports military readiness, safeguards cultural and environmental resources, and enhances local economic opportunity—is both possible and necessary.

Mahalo for your thoughtful consideration.

Sincerely,

JEREMY W. BEAVEN  
Commanding Officer  
Marine Corps Base Hawai'i

**From:** [Kim Compoc](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject Final EIS on Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:57:35 AM

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May 8, 2025

Board of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809  
[blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

**RE: Reject Final EIS on Pōhakuloa**

Aloha e BLNR members,

Mahalo for this opportunity to submit testimony on the Environmental Impact Statement on Pōhakuloa. My name is Kim Compoc, and I teach US history at the University of Hawai'i - West O'ahu. However, I submit this testimony as an individual. I am proud to add my name to the growing consensus that this EIS must be rejected and allow this offensive lease to expire. It is out of the question for this lease to be renewed. Please listen to the will of the people and do the right thing! End this lease, demand reparations, and begin the clean-up of Pōhakuloa.

The Board of Land and Natural Resources has a constitutional obligation to mālama `āina. To approve this lease would constitute a conflict with that obligation. It is important to note the Army's long and shameful history of contaminating and abusing these 20,000+ acres. As you well know, in 2018 Judge Gary Chang ruled that the Army's lease has been an utter failure:

"Defendants have failed to preserve and protect the Subject Lands as required by their duties as a trustee of the public land trust. Defendants have **failed to malama `āina** the Subject Lands under the Said Lease. These failures constitute a breach of Defendants' trust duties that apply to the Subject Lands. This failure has harmed, impaired, diminished, or otherwise adversely affected Plaintiffs' cultural interests in the Subject Lands."

Given this long and embarrassing history of failure, it's shocking that the Army would seek to renew its lease. This contamination impacts the land, the water, and the dignity of the people. While I am not Kanaka Maoli, my

Filipino family has been in Hawai'i for over 100 years, and we care for this land too. We feel the pain Hawaiian people describe in watching their ancestral lands desecrated one generation after another. People in power need to listen to the people and do the right thing.

The "training" that is conducted on Pōhakuloa is neither necessary nor honorable. On the contrary, the incessant bombing only furthers the permanent war agenda and makes the US a laughing stock. The U.S. continues its hyperfunding of the military while it defunds education, climate science, health care, and supports for the elderly and the disabled. Rather than joining with international partners to prepare for climate catastrophes like we had on Maui, we are preparing for needless wars against imaginary enemies, and abusing Hawaiian land in the process.

Although I teach at UHWO, I have several distance education students from Hawai'i island, as well as many military students. They all speak about their love for the land, and their eagerness to find jobs that contribute to that purpose. They know it is a terrible injustice that so many of our students have had to join the military to get an education or buy a home. They know the military has created great harm in Hawai'i and in the world, and they are ready to end the war economy and build the green economy. They know that ending the lease on Pōhakuloa would be a step in the right direction.

It's time to stop the madness. BLNR, do the right thing.

With respect,

Kim Compoc, Ph.d.

Assistant Professor of History

University of Hawai'i - West O'ahu

{she/her}



Antionette Correia

1547 Noelani St

Pearl City Hawaii

APPROVE the Environmental Impact Statement

Training is vital for our military to prepare to protect us from foreign enemies. Pohakuloa Training Area is the only place in Hawaii suitable for this purpose. The US Army will be moved to California or Guam. The Hawaii National Guard will have to fly to California or Guam to train. Hawaii will suffer immensely both strategically and economically.

In 2002 I was privileged to attend the closing of Kamehameha Bishop Estate JROTC which was established in 1916 by the Hawaiian Kingdom. Recognizing the importance of military training for young Hawaiian men JROTC was required for all students attending KSBE for two years. KSBE was a military school. The cadets were activated shortly after the bombing of Pearl Harbor to protect our citizens for the potential Japanese invasion.

It was a solemn day with many tears shed by those who attended. For 114 years military training was recognized as vital to our Kanaka warriors.

Today our military are part of our Hawaii and they need to train. Taking away the Pohakuloa Training Facility will leave Hawaii with no suitable training area. Listen to our Kapuna who knew the importance of the ability to defend HAWAII.

Antoinette Correia

8087210401

**May 8, 2025**

Aloha Chair Chang and Members of the Board,

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

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

**The most egregious failures of the FEIS include:**

**Toxic Contamination with No Cleanup Plan**

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

**Fire Risk Minimization**

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

**Outdated and Insufficient Air Quality Data**

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

**Lack of Comprehensive Cultural Survey and Consultation**

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

**No Incidental Take Permit for State Lands**

While the Army operates under an incidental take permit for RIMPAC in marine environments, there is no such permit disclosed for PTA. This means there is no accountability for the ongoing harm to endangered birds, plants, and other protected species — several of which are known to inhabit the leased lands.

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

The FEIS narrowly focuses on the 23,000 acres of state land without meaningfully considering the

interconnectedness of the 110,000+ adjacent federally held acres. The Army's continued refusal to acknowledge this cumulative impact renders their environmental analysis incomplete and misleading.

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

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

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

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

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

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

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

Mahalo for your time and consideration.

Me ka 'ōia'i'o,

Ruth Coules  
Honolulu, Oahu  
Hui Aloha Aina o Honolulu

**From:** [Tamara A. Paltin](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa lease  
**Date:** Thursday, May 8, 2025 8:19:25 AM

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Aloha e BLNR members,

Mahalo for the opportunity to testify on this very important matter and for your service to our communities. I am strongly opposed to the acceptance of the military's Final Environmental Impact Statement. For over 70 years Pohakuloa, which is a sacred place to kanaka maoli, has been used as a live fire zone. It has contaminated our aina and wai, they have never fully disclosed how the presence of depleted uranium has occurred, they have not cleaned up ordinances and waste since 1964 and they have caused environmental and cultural harm. I do not mean to conflate issues but the US military presence in Hawai'i leaves a significant legacy of environmental harm as well as harm to human health with examples such as Kaho'olawe, Kapukaki (Red Hill), Makua Valley, and on occasion ordinances still wash up in the Kanaha and Makena areas of Maui, please do not allow this to continue as we continue to clean up after them. The US military is downplaying the damage, for example not including the presence of burial artifacts and other sacred sites that exist, they have ignored community and cultural voices for decades and are now asking you, who are charged with protecting our natural resources for this to continue on for more decades. Please do not accept this flawed Final Environmental Impact Statement which leaves out significant information. Please stop the US military from continuing to bomb our sacred sites and environment at Pohakuloa. In closing, this federal administration is working on rooting out government waste, it seems it would be cheaper for them to do this training exercises on their own continent, if they must continue why expend so much gas and resources to fly here and continue to desecrate and destroy our ecosystems and resources which you have been charged with protecting.

Mahalo for your time and consideration,

Tamara Paltin

Councilmember West Maui, raised in Hilo, Hawaii

**From:** [Hunter Cox](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:31:52 AM

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*Aloha e Chair Chang and Members of the Board of Land and Natural Resources,  
My name is Hunter Cox and I respectfully urge you to do the right thing, and reject the  
clearly insufficient FEIS in Item D-1.*

*The public trust doctrine, embodied in our state constitution, requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources, and in protecting the interests of the present and future beneficiaries of the trust. Without cultural surveys, biological opinions, or a good faith assessment of alternative beneficial uses of the long-abused 'āina at Pōhakuloa - all things missing from the FEIS - the BLNR simply does not have the information it needs to even begin upholding these public trust duties. I urge the BLNR to reject this sorely deficient FEIS, as an affront to its responsibilities under our constitution and the public trust.*

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

*Sincerely,  
Hunter Cox*

**From:** [Jennifer Crawford](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony to reject Army's EIS on Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:55:20 AM

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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,

Jennifer Kau‘ionālani Crawford

Nānākuli, O‘ahu

**From:** [Kahelelaniokahakai Cruz](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa  
**Date:** Thursday, May 8, 2025 8:52:26 AM

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Aloha aina kakou,

This testimony is in opposition of the US army's destruction and occupation of Pohakuloa. I urge BLNR to do what's right for the land and all people of Hawaii. Here are some of the core reasons to reject the EIS:

1. The army has disclosed the widespread contamination. This will only increase. It is extremely detrimental to the health of the land, vegetation, people, and all other living things. It is extremely disturbing that the army refuses to clean up the ordinance. However, this is not surprising given the history of the army and other branches of the military in Hawaii. We must do better as a community and the people who call Hawaii home.
2. The army has not been honest about spill data, safety procedures, and has hidden and deleted critical information about toxicity and spills. This mirrors the handling of Kapukaki, Red Hill.
3. The army cannot prove that there is no contamination or spread into water and ecosystems. Kapukaki, Red Hill, is another example of blatant disregard for the environment, water, and the people. As the body entrusted with this decision making, it is imperative that you protect the people, land, and water.

The cumulative impacts of all these years of warfare activities and toxic substances has not been shared or studied with any sort of integrity. The disregard for endangered species and the people of Hawaii is unacceptable. Not to mention the climate crisis we are in as global citizens. We already know the impacts of bombing, misuse of land, and the deadly combination of all of this with the current climate crisis. Not to mention the breach of "land stewardship" for the natives of this land. This is a military occupation and we have never relinquished our rights to our land.

This is an easy decision to make. The truth is easy, pono is important. The EIS should be rejected. Pohakuloa should be protected. Pohakuloa is not for the army, it is for the pae aina and the people.

Mahalo,  
Kahelelaniokahakai Cruz



**From:** [Nowelo Heath-Cruz \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] For Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:49:49 AM

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Aloha Land Board Members:

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

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

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

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

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

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

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

Me ke Aloha,  
Nowelo Heath-Cruz  
Hālau Kū Māna PCS



Board of Land and Natural Resources  
DLNR Boardroom, Kalanimoku Building, 1151 Punchbowl Street, 1st Floor  
Online via Zoom Meeting ID: 867 3731 9705

May 8, 2025

Re: Opposition to the EIS & Lease Renewal for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai‘i, Tax Map Keys (TMKs) (3): 4-4-015:008; 4- 4-016:005; and 7-1-004:007.

Aloha Chair Dawn Chang and members of the Board,

**The Moanalua Gardens Foundation opposes the acceptance of the Final Environmental Impact Statement for the Army Training Land Retention at Pōhakuloa.** In addition, we oppose the renewal of any of the U.S. Military leases set to renew in 2029, including the lease for Pōhakuloa.

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

The Army’s actions have already resulted in the burning of nearly 20,000 acres, including designated critical habitat for native flora and fauna. This is unacceptable. Additionally, the ongoing use of live-fire and bombing in the impact area raises serious concerns about environmental contamination, safety, and long-term degradation of both the land and water. Military training activities of this scale are simply not compatible with conservation, cultural integrity, or aloha ‘āina. Enough is enough.

**The Moanalua Gardens Foundation opposes the approval of the EIS and the renewal of the lease with the military for Pōhakuloa.** However, if the BLNR decides to accept the EIS or renew the lease, we ask that the BLNR write into the lease language that guarantees the Military will do the following and holds them accountable to do so:

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

Mahalo nui loa for your time and consideration. Please feel free to contact me at 808.468.1686 or by email at [ian@mgfhawaii.org](mailto:ian@mgfhawaii.org) with any questions or to discuss how we can collaborate.

Me ke aloha pumehana,

Ian Keali'i Custino, ABD  
Executive Director, MGF Hawai‘i

**From:** [Julianna Davis](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:55:33 AM

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

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

The public trust doctrine, embodied in our state constitution, requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources, and in protecting the interests of the present and future beneficiaries of the trust. Without cultural surveys, biological opinions, or a good faith assessment of alternative beneficial uses of the long-abuses ‘āina at Pōhakuloa - all things missing from the FEIS - the BLNR simply does not have the information it needs to begin upholding these public trust duties.

I urge the BLNR to reject this deeply insufficient FEIS put forward in Agenda Item D-1.

Mahalo nui for the opportunity to testify.

Sincerely,  
Julianna Davis

**From:** [LJ Deren](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:30:14 AM

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Aloha Land Board Members:

My name is LJ and 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,  
LJ Deren

**From:** [Sierra Dew](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] comments on Pohakuloa EIS  
**Date:** Thursday, May 8, 2025 10:12:05 AM

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Aloha,

My name is Sierra Dew, and I am writing to express serious concerns regarding the Army's Environmental Impact Statement (EIS) for Pōhakuloa.

Pōhakuloa is a sacred and ecologically critical place, home to some of the most endangered species and irreplaceable Hawaiian cultural sites. The Army has already burned nearly 20,000 acres, including areas of critical habitat. In addition, there are deeply troubling omissions in the EIS — including the failure to acknowledge certain culturally significant findings, with concerns that more may have been excluded.

The Army has breached its constitutional trust responsibilities by failing to:

Reasonably monitor and inspect these lands;

Ensure compliance with cleanup and safety provisions outlined in the lease;

Take timely and appropriate action when contamination or violations were suspected or discovered;

Document and share efforts transparently with the public.

There are also ongoing concerns regarding depleted uranium contamination and the long-term impacts on the health of our land, water, and people.

I urge you to reject this EIS in its current form and hold the Army accountable to the highest standards of cultural respect, environmental stewardship, and public transparency.

Mahalo,  
Sierra Dew

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[Sierra Dew](#)

**From:** [Jill Dietmeyer](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 10:16:59 AM

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Aloha e Chair Chang and Members of the Board of Land and Natural Resources. I am from Pearl City and previously from Kailua-Kona, Hawai'i.

I respectfully urge you to reject the clearly insufficient FEIS in Item D-1. The BLNR must exercise DUE DILIGENCE managing our natural and cultural resources. You simply do not have enough information to make a good faith assessment at Pohakuloa and you should demand more complete environmental impact data and assessment. The Army must fully account for the harm it has and will inflict on the Native Hawaiian community. Please require the needed biological and archaeological surveys to understand without question, the effects on endangered native species and historic properties. It is your kuleana to have all the facts.

*Jill Dietmeyer PT, DPT, LMT*

**OrthoSport Hawaii**  
**745 Fort St #116**  
**Honolulu, HI 96813**  
**Phone: (808) 599-5500**  
**Fax: (808) 373-3666**  
**[www.OrthoSport.com](http://www.OrthoSport.com)**

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**From:** [Pawehi Domingo \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, May 8, 2025 8:51:09 AM

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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.

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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,  
AleahBella Pawehimekealohaikapualena Domingo  
Halau Ku Mana

**From:** [Jeremiah Domingo-Lavea \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:05:11 AM

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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.

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

Concerns about depleted uranium on the site have gone unaddressed

Military usage is incompatible with the conservation district designation

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

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

Sincerely,  
Jeremiah Domingo-Lavea

Posted by HAPA May 5, 2025!




Just like we did on Kaho'olawe, Hawaiian practitioners have been engaging in Makahiki Ceremonies for almost a decade now to bring peace and fertility to Pōhakuloa.

P.O. Box 431, Hilo, Hawai'i  
96721  
(808) 769-4646

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Check out our website — 

**From:** [Julia Donath](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Stop the desecration of Pōhakuloa  
**Date:** Thursday, May 8, 2025 9:25:57 AM

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Aloha,

As a social worker and educator in the Hawai'i community I'm writing to express my disapproval of extending the U.S. military's lease at Pōhakuloa.

An Environmental Impact Statement cannot possibly capture the cultural trauma, environmental injustice and community violence unleashed by accepting this request. Historically and presently, the US military are not good stewards of the land. In an era of rapidly increasing environmental pressures, climate violence, and toxic aftermaths that primarily impact indigenous Hawaiians and youth, we cannot accept this proposal.

Please deny their request to increase their lease and instead, let's problem solve avenues to restore Pōhakuloa, give Hawaiians agency, and give our youth something to be hopeful about. Our youth should be graduating from school with job opportunities to restore and heal their island and community. There are better ways of relating to this land than selling it off to be desecrated, bombed, abused and polluted. Our community needs a new blueprint, and rejecting this proposal is a first step.

Thank you,

Julia Donath

Sent from my iPhone

**From:** [Cyn](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony - Agenda Item D1  
**Date:** Thursday, May 8, 2025 9:42:47 AM

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May 9, 2025

Aloha e Board Members,

I am writing to express my strong opposition to agenda item D.1. I strongly urge you to vote against the acceptance of the FEIS that the US Army submitted on April 18 before the 30 day deadline has passed. Allowing such a careless and egregious Environmental Impact Statement to be accepted will erode accountability and transparency in the management of lands that are crucial to our communities, natural resources, and cultural practitioners. It is my position as a beneficiary and lineal descendant of the Kanaka Maoli people that these lands are seized Hawaiian Kingdom Crown and Government lands and are not for any department of the State of Hawai'i to lease or otherwise transfer to the US military at all.

The FEIS that is being proposed by the Army is just as incomplete as the original draft that was proposed two years ago. The Army has failed to address key concerns such as cumulative environmental impact, the impact on the water table not only from toxic run off such as lead, depleted uranium, and white phosphorus but also the impact of bombing a central water aquifer for the last 60 years. Other concerns that have been voiced many times include the cultural impact on Kanaka Maoli being forcibly dispossessed from our energetic piko, cumulative impacts that the so called training within Pohakuloa has had on endangered species which the Army is obligated to mitigate, the UXO in Pohakuloa and the Army's inability to clean up or restore any of the occupied lands to their original conditions, not to mention that to the public's knowledge, the Army has failed to pay the rental fee of one dollar for 65 years.

The Army's failure to properly address any of these issues puts their disregard for the rights of Kanaka Maoli and their obligation to malama aina as the current tenant on full display. This Board therefore, has the kuleana of safeguarding the lands that are held in the trust of the State for the benefit of the people of Hawaii. I ask you now: how does the bombing of our land, the poisoning of our air and water, and the disconnection from our iwi kupuna and sacred sites benefit anybody, be they Kanaka or haole?

I wish to also strongly emphasize that the Army's irreverent destruction of our sacred spaces here in Hawaii Nei is deeply reminiscent of the illegitimate state of Israel's destruction of Gaza, Palestine. I have no doubt that if it were allowed, all branches of the US occupational military would play whatever war games and drop whatever bombs suited them at any time with impunity, much as we see happen every two years with RIMPAC. The people of Hawaii would surely benefit from clean waters, lands and air, and we all know that the military will never provide those things since they are in direct opposition to the function of the US Military Industrial Complex. The time to end the destruction and desecration has long since passed, but it is never too late to uphold morality and ethics over profit and imperialism.

In closing, I strongly urge the Board to remember the Hawai'i State Supreme Court determination that the State of Hawai'i has an obligation to uphold the principle of "mālama 'āina" and ensure the protection and stewardship of the lands entrusted to its care, including those leased to the military. The Board must take this kuleana seriously and vote no on agenda item D.1.

Moving forward, it is the demand of Hawaiinui people that Board meetings concerning this issue be held ON Hawaiinui instead of putting the burden of travel onto kupuna, Kanaka, and other concerned residents. This burden is undue and while written and virtual testimony is an option, we all know that those are not the equivalent of addressing the Board alo i ke alo. If the Army can have their scoping meetings in Waimea, then surely the State department dedicated to the management of our lands and waters can find a way to allow the people of Hawaiinui to properly address this issue.

Aloha Aina Oiaio,

Kauanuialeimaka Doyle

**From:** [Makana Dudoit](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] STOP the Bombing of Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:49:29 AM

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Aloha mai e nā 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.

Me ka ha'aha'a a ke aloha 'āina,  
Makanamaikalani Dudoit  
Hālau Kū Māna



**From:** [Tania duPont](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT ARMY'S EIS FOR POHAKULOA  
**Date:** Thursday, May 8, 2025 8:58:37 AM

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I am a concerned citizen writing to express my dissent with the Army's EIS for Pohakuloa.

The EIS is not adequate:

Conservation District Compatibility - unresolved

Protection of endangered species - inadequately addressed

Environmental contamination and cleanup - deferred

Cultural impacts and environmental assessments - superficial and insufficient response

Evaluation of alternatives - inadequate

Fire risk and suppression - inadequately addressed

The military cannot be allowed to continuously degrade this land and the people who belong to it. PROTECT POHAKULOA.

**From:** [Benjamin Enos](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohaku  
**Date:** Thursday, May 8, 2025 8:17:26 AM

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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,  
Benjamin Umi Kalā-i Enos  
Hawaii Island

Sent from my iPhone

**From:** [Kahau Enos](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa  
**Date:** Thursday, May 8, 2025 8:23:09 AM

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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.

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. 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.

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

The FEIS should be rejected! These are just a few examples as to why:

- 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.

With all the koko flowing through my veins,

HENSLEY KAHAUNANI ENOS JR  
KAAAWA, HAWAII

**From:** [Pono Enos](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the Army's EIS.  
**Date:** Thursday, May 8, 2025 8:05:18 AM

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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.

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. 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.

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

The FEIS should be rejected! These are just a few examples as to why:

- 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.

With all the koko flowing through my veins,

CHRISTOPHER IMIPONO ENOS

Hilo, HI

**From:** [georgia eyerman](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, May 8, 2025 8:55:18 AM

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

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

The public trust doctrine, embodied in our state constitution, requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources, and in protecting the interests of the present and future beneficiaries of the trust. Without cultural surveys, biological opinions, or a good faith assessment of alternative beneficial uses of the long-abused 'āina at Pōhakuloa - all things missing from the FEIS - the BLNR simply does not have the information it needs to even begin upholding these public trust duties. I urge the BLNR to reject this sorely deficient FEIS, as an affront to its responsibilities under our constitution and the public trust.

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

Mahalo nui for the opportunity to testify.

Sincerely,  
Georgia Eyerman

**From:** [Isabell Feki](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the Army's EIS Testimony  
**Date:** Thursday, May 8, 2025 10:10:48 AM

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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.

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,

Isabell H. Feki

Native Hawaiian resident of Big (Hawaii) Island

**From:** [Breanne Fong](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT FEIS (Agenda Item D-1)  
**Date:** Thursday, May 8, 2025 8:11:43 AM

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

My name is Breanne Fong and I am from Niu, Kona, O'ahu. 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.

Other reasons the BLNR should reject the Army's Final EIS include: 1) the Army admits widespread contamination but refuses to assess or clean it up; 2) the Army cannot prove that contamination has not spread into water or ecosystems; 3) the Army won't share safety procedures or spill data and deletes critical information; 4) fires, endangered species, and climate harms are dismissed without evidence; 5) the FEIS evades Hawai'i Law by ignoring obvious cumulative impacts.

It is evident how harmful accepting the Army's Final EIS would be -- to not only the environment and 'āina but Hawaiian culture and people's ability to connect with the 'āina and take care of it. Hawai 'i has already gone through enough pain and suffering due to the impacts of the military, namely the bombing on Kaho'olawe and the ongoing desecration of Mauna Kea along many other instances where Hawaiian culture and 'āina are being actively harmed. Please do not perpetuate the erasure of Hawaiian culture and ongoing harm to 'āina and overall lāhui.

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,

Breanne Fong



**From:** [Pili](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Opposition to U.S Army lease  
**Date:** Thursday, May 8, 2025 8:54:21 AM

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Aloha Land Board Members:

I am a 10th grader of Hālau Kū Māna and i am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **Pōhakuloa Training Area**, and to **urge the land board to reject the Army's EIS**.

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

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

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

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

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

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

Me ke aloha,  
Pili Freed

**From:** [Ku'ulei Fujiyama](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa EIS at BLNR  
**Date:** Thursday, May 8, 2025 8:50:15 AM

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Aloha Land Board Members:

I'm writing to express my **firm opposition** to the U.S. Army's request to retain leased lands at Pōhakuloa Training Area and to ask that the land board reject the Army's Final Environmental Impact Statement.

Pōhakuloa is far more than a training ground—it is a wahi pana, a sacred and storied place that holds deep cultural significance and is home to cultural sites and fragile ecosystems. Unfortunately, the Army has not proven to be a responsible caretaker of this land, and the FEIS does not adequately address the serious concerns raised by the community.

Over the years, the Army's presence has led to severe damage, including wildfires that scorched nearly 20,000 acres—some of which include critical habitats for native species. This level of harm is alarming. The continued use of live-fire exercises and bombing in the area brings additional risks of contamination and long-term harm to the land, water, and all who depend on them.

The scale and nature of military activities at Pōhakuloa are simply incompatible with the values of conservation, cultural respect, and aloha 'āina.

There are multiple reasons the FEIS should not move forward:

- It fails to provide a thorough analysis of environmental and cultural impacts.
- It lacks a solid plan to reduce damage to natural and cultural resources.
- It does not sufficiently address concerns about contamination, including depleted uranium.
- Military activity does not align with the area's conservation designation.
-

Most importantly, approving this EIS goes against the BLNR's constitutional responsibility to mālama 'āina.

I ask the board to honor its kuleana to Hawai'i's land and people by rejecting the Army's proposal. Let's start the work of returning these lands and caring for them with the respect they deserve.

Me ke aloha 'āina,  
Kelsy Fujiyama  
Hālau Kū Māna

**From:** [Ashley Galacgac](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Stop The Desecration Of Pōhakuloa  
**Date:** Thursday, May 8, 2025 9:01:16 AM

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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**.

Land ought to be cared for, not be used for training grounds for warfare with soldiers practicing how to wield bombs and weapons in Hawai'i and then ultimately launching death and destruction globally. Military training activities of this scale are simply not compatible with conservation, cultural integrity, or **aloha 'āina**. There are land stewards and cultural practitioners who have the knowledge and skills to lead and to act in ways that are good for the life and health of the land, water, and people here in Hawai'i. **Pōhakuloa and lands across the pae 'āina ought to be in the hands of the people again.**

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**. I have participated in listening sessions by the army about the EIS process and witnessed a multitude of people express concerns. This draft only confirms the U.S. military's prerogative to enact violence on land, water, and people regardless of what the people say.

Land Board Members have the kūleana to listen to the people and have the opportunity to do what is right and uphold the constitutional duty to mālama 'āina. This weekend is Mothers' Day and we need to be reminded that 'āina is an ancestor who gives birth to life. Know that this EIS does not even address how the violence of the U.S. military permeates into the communities where the safety of women, girls, and māhu are impacted. As there is violence enacted on the land, military personnel contribute to the rise of domestic violence, intimate partner violence, and the sex trade in Hawai'i.

Reject the Army's EIS and hold the Army accountable for the **burning of nearly 20,000 acres**, including designated **critical habitat** for native species. Live-fire and bombing means **environmental contamination, safety, and long-term degradation** of land, water, and people.

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. End the leases/. It's time to return these lands and begin a real process of healing and restoration. Mahalo for the opportunity to provide testimony.

Sincerely,

Ashley Ancheta Galacgac  
O'ahu

**From:** [Mamie Lawrence Gallagher](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] A"ole continue bombing at Pohakuloa  
**Date:** Thursday, May 8, 2025 9:00:03 AM

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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,

Mary A. B. Lawrence Gallagher (Mānoa, currently, but of Hawai'i and Maui)

ancestrally)

and my haumana:

Alicia B. - age 7

Lola B. - age 11

Reef B. - age 8

Claire C. - age 9

Jack F. - age 10

Orion Star K-H. - age 11

Luke K. - age 9

Koa K. - age 10

Cecilia M. - age 8

Oscar M. - age 10

Nari R. - age 11

Gabby S. - age 9

Avni T. - age 6

Maya T. - age 8

Orion W. - age 8

Noa Y. - age 12

Portia Z. - age



**From:** [Mekhi Gamboa \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:00:41 AM

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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,  
Mekhi Gamboa

Hālau Kū Māna Public Charter School

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*Mahalo,*

*Mekhi Gamboa*

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

**From:** [Nalani R Garmon](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa Lease Extension  
**Date:** Thursday, May 8, 2025 10:08:30 AM

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Aloha, my name is Nalani Garmon, I am from Hilo and was raised in both Waimea and Hilo. My mother is Ulunui Kanaka'ole, a full Hawaiian Indigenous practitioner and my father is Captain Ezra T Garmon, JR, USMC retired. They have both passed and I speak of them in the present because they are ever present, always with me.

I mention very briefly who my parents are because I want you to understand that I am not just "another angry Hawaiian" - I know what it means to the military to have Pohakuloa in its grasp. I know what it means to the Nation of the United States to have that space to run drills. My father gave nearly 40 years of his life to the country - and all of our childhood as well - so I know all too well what it means.

But enough is enough.

The US has done far more harm than good for our - and many other - Indigenous lands. Our resources on an island in the middle of the ocean are finite and the military has shown their disregard for those resources for many decades on every island it occupied and bombed. It's time to say, enough before there is nothing left for my children's children.

I could cite former and present EIS reports, chants and mo'olelo, but that's been covered to ad nauseum. I will just say as an Indigenous person, a child of two worlds, a mother and grandmother, and Native practitioner: stop taking from us. Stop demanding that we provide for you and the rest of the nation you are loyal to. Stop weaponizing aloha as if we owe you. We do not owe you and we want our sacred spaces back.

Mahalo,

Nālanī Garmon Sent from the center of my universe

**From:** [Olivia Gegen](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:26:12 AM

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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,  
Olivia Gegen

Anahola, Kaua'i

**From:** [Reed Geritz](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Rejection of the Army's Environmental Impact Statement  
**Date:** Thursday, May 8, 2025 9:07:05 AM

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Hello,

My name is Reed Geritz and I'm emailing you all to let you know that the Army's Environmental Impact Statement is harmful to maintaining the culture of Native Hawaiians, which should be the topic of highest consideration in any decision making like this. Here are some more detailed reasons it needs to be rejected:

- 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 is the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina

In addition to this, the army has already burned 20,000 acres of land home to Native Hawaiian cultural sites, native species, and native flora and fauna. They have already shown that they have no concern for Native Hawaiian culture and they need to be held accountable. Please stand with the Hawaiian people and reject the EIS.

Thank you.

-Reed Geritz

**From:** [Ana Giliberti](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa EIS testimony  
**Date:** Thursday, May 8, 2025 8:08:53 AM

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

**Date: 05/09/25**

Aloha Chair Chang and Members of the Board,  
My name is Ana Giliberti.

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.

Ana Giliberti  
MSCP, MFT-I  
808 517 6412  
Sent from my iPhone

**From:** [Kaya Givensel](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1  
**Date:** Thursday, May 8, 2025 10:02:48 AM

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Aloha Chair and Members of the Board,

I strongly oppose Agenda Item D-1. Pōhakuloa is not just land—it is sacred, and it carries the spirit of our ancestors.

The Army's FEIS ignores our cultural values, fails to conduct proper surveys, and dismisses the voices of our people. This is not pono. I urge you to reject this incomplete and harmful document and fulfill your responsibility to protect what is sacred.

Mahalo nui,  
Kaya Givensel

**From:** [Jennifer Gonsalves](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Pōhakuloa! Reject the Army's FEIS and Uphold Your Duty to Mālama 'Āina  
**Date:** Thursday, May 8, 2025 8:59:41 AM

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**Aloha Land Board Members,**

As a Native Hawaiian educator and cultural practitioner, I am writing to express my deep opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and to urge the Board of Land and Natural Resources to reject the Army's Final Environmental Impact Statement (FEIS).

**Pōhakuloa is not just a training site—it is sacred ground. A *wahi pana*.** A place woven with ancestral knowledge, rich cultural history, and home to fragile ecosystems found nowhere else on Earth. This 'āina deserves reverence, not continued destruction.

Over the years, **the Army's presence has resulted in devastating harm to the land**, including the burning of nearly 20,000 acres—land that includes critical habitat for endangered native species. These are not isolated incidents; they are symptoms of an extreme failure of stewardship.

One of the most urgent and unaddressed threats is **depleted uranium contamination**. The Army has admitted to its use at Pōhakuloa, and yet the danger is ongoing. During live-fire exercises, depleted uranium in the soil is disturbed, aerosolized, and carried by the wind across the island. Exposure to this toxic substance has been linked to cancer and numerous serious health conditions. The Army's EIS fails to adequately acknowledge or address this public health hazard.

**The Army has not demonstrated the care, responsibility, or cultural understanding necessary to protect and honor this place.** Continued bombing, live-fire training, and the presence of unexploded ordnance endanger the health of the land, water, and people. Cultural sites continue to be disrespected, and the FEIS does not offer sufficient plans to prevent further harm.

This kind of military use is **not** aligned with the purpose and spirit of the conservation district designation. It also directly conflicts with the BLNR's constitutional **kuleana to mālama 'āina**.

As someone committed to the wellbeing of future generations, **I urge you to stand in pono. Say no to the Army's FEIS.** Let us begin the necessary process of returning and restoring Pōhakuloa, so healing can truly begin.

**Me ka ha'a ha'a,**  
*Jennifer Gonsalves*

Pauoa, O'ahu



**From:** [Cassandra Rayne](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D-1 Acceptance/NonAcceptance of FEIS  
**Date:** Thursday, May 8, 2025 8:13:38 AM

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Aloha Board Members:

I am against the acceptance of the Army's Final EIS regarding the training areas at Pōhakuloa for two primary reasons.

**1) The EIS does not address several areas which it is required to address under the law, including:**

- The failure to disclose incidents related to the cultural artifacts found in the area
- The failure to address the impacts on cultural artifacts and the impact on the native Hawaiians
- The failure to address the lack of surveying the area for cultural artifacts which could be destroyed or impacted by continue

It is also inadequate in areas such as freshwater management and impacts on wildlife.

**2) The EIS does not address the Army's failure to clean up from its past activities. The army's remediation efforts have not complied with its lease and are inadequate. The Army needs to revise the EIS to clarify how they will remediate to minimize impacts and acknowledge the mitigation that is yet to be completed under the first lease.**

Mahalo,

Cassandra

Cassandra Rayne Gross M.B.A.  
808-234-3969 / [raynecassandra@gmail.com](mailto:raynecassandra@gmail.com)

**From:** [sara.hagstrom](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Opposition to Army EIS  
**Date:** Thursday, May 8, 2025 8:43:33 AM

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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,  
Sara Hagstrom



**From:** [Tiare Lawrence](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D1  
**Date:** Thursday, May 8, 2025 11:53:25 AM

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Aloha Chair and Members of the Board,

We strongly oppose Item D-1, which proposes the renewal of the U.S. military lease of lands at Pōhakuloa. We urge you to deny the Final Environmental Impact Statement and refuse to grant any extension or new lease. This is a critical moment in our history. We must choose to protect the ‘āina, not perpetuate its destruction. Maui stands firmly with Hawai‘i Island. The time to restore Pōhakuloa is now. We have seen what military occupation looks like. It looks like Kaho‘olawe, cratered and poisoned. It looks like Makua Valley, contaminated and silenced. It looks like the continued desecration of Haleakalā, our sacred summit, leased to a military that has never earned our trust. This is not protection. This is American imperialism, and it has no place on our ‘āina. Over 29,000 Native Hawaiians remain on the waitlist for Hawaiian Homelands, while military personnel are housed across Hawai‘i using federal housing vouchers. Our people are being priced out, pushed aside, and ignored, while our lands are leased, bombed, and defiled. The military claims stewardship. We see contamination. They claim partnership. We see broken promises. They claim necessity. We see desecration. We say no to the renewal of the lease. We say no to the Final EIS. We say yes to demilitarization. We say yes to the healing of Pōhakuloa. We say yes to the protection of Haleakalā. And we say yes to the future of our people, free from the violence of occupation. Kāko‘o Haleakalā. Restore Pōhakuloa. Reject Item D-1. Deny the Final EIS. The time is now. ‘A‘ole hou.

Mahalo  
Kāko‘o Haleakalā

**From:** [J. Noelle Hall](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:41:11 AM

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Greetings,

I **reject** the Army's environmental impact statement (EIS) due to it being insufficient on several grounds:

- Fails to recognize that military use of this land is incompatible with the conservation designation
- There has been little to no transparency regarding both inspections and the procedures taken for clean up
- Fails to provide any sufficient records of archeological inventory and cultural artifacts
- Out-dated studies and records on endangered wildlife
- Fails to address concerns about depleted uranium on site
- Fails to comply with BLNR's constitutional duty to mālama 'āina

Furthermore, land desecration by military presence leaves generational scars for Kānaka Maoli. This harm has impacted us mentally, physically, emotionally and spiritually for **generations**.

I am a Kānaka Maoli and resident of Hilo, Hawai'i and again, I **reject** the army's insufficient EIS.

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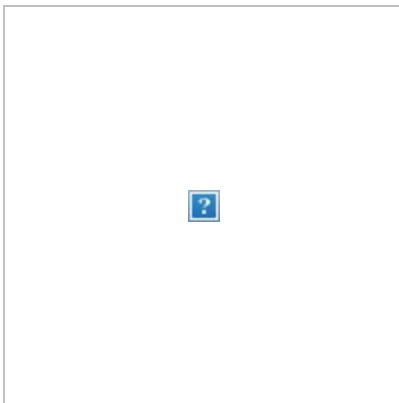
**J. Noelle Hall MA, LMHCA**

(She, hers)

206-687-4747

<https://momi.health/>

<https://www.therapyportal.com/p/mindovermatters98121/>



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**From:** [JNK Hall](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:38:18 AM

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To whom it may concern,

I am a Kānaka Maoli and resident of Hilo, Hawai'i.

I **reject** the Army's environmental impact statement (EIS) due to it being insufficient on several grounds:

- Fails to recognize that military use of this land is incompatible with the conservation designation
- There has been little to no transparency regarding both inspections and the procedures taken for clean up
- Fails to provide any sufficient records of archeological inventory and cultural artifacts
- Out-dated studies and records on endangered wildlife
- Fails to address concerns about depleted uranium on site
- Fails to comply with BLNR's constitutional duty to mālama 'āina

Furthermore, land desecration by military presence leaves generational scars for Kānaka Maoli. This harm has impacted us mentally, physically, emotionally and spiritually for **generations**.

Again, I **reject** the army's insufficient EIS.

Regards,  
Ku'u lei Hall

**From:** [Caelan & Heather O'Meara](#)  
**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 10:28:23 AM

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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.

Mahalo,  
Heather Haneberg-O'Meara, MSN, RN  
Ewa Beach, O'ahu

Sent from my iPhone

**From:** [Reyna Ramolete](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT the Army's FEIS in Agenda Item D-1.  
**Date:** Thursday, May 8, 2025 11:41:35 AM

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

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

The FEIS:

- Ignores environmental impacts on federal lands;
- Fails to include cultural and biological surveys to protect historic sites and prevent extinctions;
- Downplays clear threats to native birds and wildlife;
- Fails to identify alternative uses of the land;
- Fails to account for the mishandling of cultural artifacts;
- Fails to recognize that military training is not an acceptable use of the conservation district; and
- Fails to acknowledge the harms that desecration of 'āina inflicts on Native Hawaiians.

If the BLNR accepts 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 - at the expense of our natural and cultural resources, and Hawai'i's present and future generations.

Native Hawaiians have 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.

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

Mahalo nui,  
Reyna Ramolete Hayashi  
Honolulu, Hawai'i

--

Reyna Ramolete Hayashi

Dawn Hegger-Nordblom  
PO Box 791001, Paia, Hawaii 96779  
Phone: (808) 282-2141  
alaulapua@hotmail.com

May 8, 2024

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

I am testify on Agenda Item D-1 in my individual capacity.

My professional background is a land use planner. I have worked for the State Department of Land and Natural Resources (DLNR), Office of Conservation and Coastal Lands (OCCL) as the Senior Planner, for Maui County as a planner, for the State Hawaii Army National Guard as the National Environmental Policy Act Coordinator. I am the Vice-Chairperson on the Environmental Advisory Council.

Please vote “that the final EIS does not comply with applicable law and does not adequately disclose the environmental impacts of the proposed action, and thus rejects the final EIS as submitted by USAG-HI and IMCOM” before the Board of Land and Natural Resources (BLNR) as Agenda Item D-1, “Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai‘i, Tax Map Keys (TMKs) (3): 4-4-015:008; 4-4-016:005; and 7-1-004:007.”

Please vote before quorum is lost so the FEIS is not automatically accepted/approved in order to meet the May 14, 2025 deadline to either accept or not accept the final EIS.

The FEIS lacks an complete inventory of archeological sites, lack of current studies/robust summaries for endangered biological resources or current biological opinion, lack of invertebrate survey, alternative discussion section to move PTA out of the Conservation District with a Land Use District Boundary Amendment, potential negative noise impacts to wildlife and birds, insufficient Cultural Impact Assessment (CIA) due to lack of contact with knowledgeable persons with strong cultural connections to PTA, negative impacts to historic and cultural properties and 'iwi kupuna, compliance with Hawaii Revised Statutes (HRS) Chapter 195D, lack of incidental take license (ITL) and lack of a habitat conservation plan (HCP) for unavoidable take of state- listed species: 'Ope'ape'a, Nene, 'Io (Hawaiian hawk), Palila, 'Ake'a, 'U'au, Invertebrates, proposed clean-up activities should the State-leased lands be returned to the State public trust, lack of data on greenhouse gas emissions, and lack of coordination with the DLNR Historic Preservation Division and Division of Forestry and Wildlife.

The FEIS does not, "fully declare the environmental implications of the proposed action" and the BLNR may not have been given the "full range of responsible opinion on environmental effects."

The State Land Use Conservation District "was established to protect Hawaii's natural resources and encompasses various land types including watersheds, scenic areas, parklands, wilderness areas, beach reserves, and habitats for endemic plants and wildlife." Hawaii Administrative Rules (HAR), Chapter 13-5, Section 13-5-1 notes the purpose of Chapter 13 is to regulate the land use in the conservation district for the purpose of conserving, protecting, and preserving the important natural and cultural resources of the state through appropriate management and use to promote their long-term sustainability and the public health, safety, and welfare.

Military training is not an identified land use in the conservation district. The FEIS discusses a proposed rule amendment for a new subzone to allow military training. This is pure speculation and presumptuous of the FEIS that the DLNR and/or the BLNR would support the proposed action.

I understand that the BLNR has no control over military documents such as the Pōhakuloa Integrated Cultural Resources Management Plan (ICRMP) [https://home.army.mil/hawaii/application/files/4815/8379/7699/1\\_USAG-P\\_ICRMP\\_Hawaii\\_Final\\_Signed.pdf](https://home.army.mil/hawaii/application/files/4815/8379/7699/1_USAG-P_ICRMP_Hawaii_Final_Signed.pdf) (dated April 18, 2023).

The PTA should update the cultural resources management activities to discuss the 1,198 known archaeological sites and when the 39 sites will be added to the National Register of Historic Places. The ICRMP should: 1) identify and discuss the 326 sites that have been determined not eligible, 2) discuss the action for the 822 sites that are unevaluated from the 19th or 20th century, Traditional Hawaiian, Traditional Hawaiian and historic-era contexts, recent, and identify the period of significance, 3) survey the PTA High Hazard Impact Area and area outside the Impact Area, and 4) provide ongoing communications with State and County agencies.

Please determine "the final EIS does not comply with applicable law and does not adequately disclose the environmental impacts of the proposed action, and thus rejects the final EIS as submitted by USAG-HI and IMCOM" before the BLNR as Agenda Item D-1.

Mahalo

Dawn Hegger-Nordblom

**From:** [Hanaloa Helela](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the FEIS for Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:56:44 AM

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

*I am Hanaloa Helelā from Waikakalaua. As Kanaka 'Ōiwi Hawai'i and an Aloha 'Āina, I strongly recommend that you reject the grossly insufficient FEIS in Item D-1.*

*As written in Article XI, Section 1, provision 2, the public trust doctrine in the Hawai'i state constitution mandates that the BLNR 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 Pōhakuloa, the BLNR does not have adequate information to assess adverse impacts from the continued misuse and mismanagement of these sacred lands by the U.S. Army. The BLNR must fulfill its mandate to uphold the public trust and soundly reject this inadequate and deficient FEIS in Agenda Item D-1.*

*Aloha 'Āina me ka oia 'i'o,  
Hanaloa Helelā*

**From:** [Taytum H](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony in Regards to Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:34:36 AM

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Aloha Land Board Members:

My name is Taytum K Herrick and I come from Lahaina, Maui. 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. Another thing to mention, I just saw on HNN news from yesterday that the military FAILED to include findings of Hawaiian artifacts in a lava tube and that they decided to simply just remove them from the area.

Have we not learned from Kaho'olawe? I was just there last week to help build ceremonial alaloa, in hopes to heal the land from the decades of bombing. There, we clearly saw what the US military thinks of our native people and culture through heavy bombing on our grave sights and heiau. I even felt the bullet indentations into rocks with ancient petroglyphs as seeing our stories as "targets".

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.

Mahalo me ke Aloha,  
Taytum Keanuheaokaua Herrick

**From:** [Kelvin Ho](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa testimony  
**Date:** Thursday, May 8, 2025 8:04:29 AM

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Board of Land and Natural Resources  
State of Hawaii  
Department of Land & Natural Resources  
1151 Punchbowl St  
Honolulu, Hawaii 96813

Chairman Chang and Members of the Board

Thank you for the opportunity to voice strong opposition to renewing the military's lease on Pohakuloa. Its insane to allow the continued use of a sacred and environmentally extremely important watershed area as a target range. As a 30 year member of the Protect Kaho'olawe 'Ohana I urge you to read your mission statement and take it to heart for the people of Hawaii, their children and children's children.

Allowing this lease to continue will weaken the rights and health of Hawaii's people and continue to give precedence to the military dictating its will over the people of this land.

Have the courage to take a stand for what is pono and defer -deny this request.

Kelvin Ho  
PO box 769,  
Lawai Hi 96765



**From:** [Malie Holt Mizuguchi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony - BLNR to reject the Army's EIS @Pohakuloa  
**Date:** Thursday, May 8, 2025 8:44:20 AM

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Aloha,

My name is Mālie Holt-Mizuguchi. I was born, raised, and currently raise my children in the area of Kaumana, on the slopes of Mauna Kea.

I humbly ask for the BLNR to reject the Army's EIS.

The continued desecration and disrespect by the us army to the land, and by extension the Hawaiian people is unethical, unsustainable, and unsafe for the future of native plants and animals to the area and Hawaii's natural resources.

Mahalo,  
Mālie



08 May 2025

[blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

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

**Testimony in Support of the Pōhakuloa Training Area  
For consideration at BLNR Meeting – 09 May 2025**

Honorable Chairperson Chang and Members of the Board,

It is my privilege to provide this testimony on behalf of the Hawai'i Island Economic Development Board (HIEDB) incorporated as a private, member-based 501(c)3 in 1984 to provide and promote private sector support and expertise for balanced growth, developing and maintaining a strong economy for Hawai'i Island in partnership with Federal, State, County, and private resources. We strongly support and ask your approval of the continued use of Pōhakuloa Training Area (PTA).

PTA has a very positive and strong impact on Hawai'i Island's community, economy, growth and stability. The direct and ancillary jobs, contracts and business with local vendors and service providers, as well as, providing front-line and emergency first response to vehicular and other accidents in the Saddle Road area and on the summit of Mauna Kea, wild range fires, are some of the examples of the importance of PTA as a valuable and contributing member of our community.

While PTA's contributions extend well beyond the Army's primary mission of troop preparedness, it is important to recognize that primary mission includes providing necessary training, support, and life-saving skills upon which our community's sons, daughters, husbands, wives, fathers, mothers, neighbors and friends who serve including as members of the National Guard (Army and Air), military reserves, and regular military depend. Support in these areas is also provided to our civilian first responders, firefighters, and law enforcement personnel.

We humbly ask the Board to give full consideration to, and acceptance of the Final Environmental Impact Statement (FEIS) prepared and submitted. HIEDB believes the Army is working in good faith on multiple fronts including preservation and protection of cultural, historical, environmental, and other natural resources. More importantly, the Army has consistently demonstrated its commitment as a good neighbor and member of our community.

Mahalo for this opportunity to speak in support of our valued neighbor and friend.

Sincerely,

Jacqui Hoover  
Executive Director and COO

**From:** [Jocelyn Hueu](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony in Opposition to the Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 8:58:25 AM

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Aloha Chairperson and Members of the Board,

I am writing in *strong opposition* to the acceptance of the Final Environmental Impact Statement (EIS) submitted by the U.S. Army for the proposed retention of approximately 23,000 acres of public lands at Pōhakuloa Training Area (PTA) on Hawai‘i Island.

This EIS fails to adequately assess and address the grave cultural, ecological, and historical impacts of continued military use of this wahi pana—this sacred and storied place. Pōhakuloa is not merely a tract of land for military exercises; it is a living landscape, home to Native Hawaiian ancestral sites, cultural practices, and critically endangered species found nowhere else on Earth.

Despite decades of military control, there is no evidence that the Army has upheld its responsibilities as a steward of these lands. Instead, we have seen contamination from munitions, damage to cultural sites, and a consistent failure to engage meaningfully with Native Hawaiian communities. To extend this lease another 65 years—based on an incomplete and flawed environmental review—is to perpetuate harm and further alienate the people of Hawai‘i from our sacred places.

I respectfully urge the Board to reject the current EIS and deny its certification. The people of Hawai‘i deserve better. Our ‘āina deserves better. This moment calls for courage, kuleana, and respect for the cultural and environmental integrity of our islands.

Mahalo for considering this testimony and for your commitment to protecting Hawai‘i’s irreplaceable natural and cultural heritage.

Me ka ‘oia‘i‘o,

Jocelyn Hu'eu



May 8, 2025

To: Board of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawai'i 96809  
blnr.testimony@hawaii.gov

From: Huliauapa'a  
Native Hawaiian Organization  
PO Box 141  
Hakalau, HI 96710

**Subject: Opposition to the Final EIS and the U.S. Army's Proposed Retention of Leased Lands at Pōhakuloa Training Area**

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area (PTA) and to urge the Land Board to reject the Army's Environmental Impact Statement (EIS).

Pōhakuloa is a wahi pana, wahi kapu, wahi kupuna, and a continuous cultural landscape stretching from the Pu'uhuluhulu region in Hilo to Ahu a 'Umi Heiau in Kona, as well as the conservation lands surrounding Pu'u Kapele and Pu'uke'eke'e within the Kohala District. The name Pōhakuloa itself references a significant Native Hawaiian deity associated with canoe makers, ko'i (adze) specialists, and the protector of the waters of Kāne on Maunakea.

In the ka'ao of Kamiki and Maka'iole, Pōhakuloa is depicted as a vital landscape where water travels from the highest peak of our mauna to Lake Waiau, then to Pōhakuloa Gulch, and finally into the flat interior lands. These waters flow underground through caves and the aquifer. Pōhakuloa is also situated within the ahupua'a of Ka'ohe (Bamboo), named for the lush greenery that blankets the makai side of Mauna Kea and the water held within bamboo at its base. This name also highlights the ahupua'a characteristic of holding subterranean water known as the Pōhakuloa aquifer.

The existence of the Pōhakuloa aquifer was confirmed during water testing for the TMT project on Mauna Kea, revealing a unique dyke system separate from the main aquifer. The Army, however, did not permit testing for contaminants, and it was noted that the aquifer contains ancient water that has been stored for an extended period.

These examples demonstrate the profound cultural connection and significance of Pōhakuloa, which have been overlooked in previous Archaeological and Cultural Impact Assessment (CIA) studies. The Army's EIS fails to recognize Pōhakuloa's cultural importance within the broader 'āina mauna landscape, including the lands between Mauna Kea, Mauna Loa, and Hualālai. Furthermore, it disregards the perspectives and cultural knowledge of Native Hawaiian Organizations (NHOs) and the public.

PTA encompasses over 1,000 historic properties, including numerous features such as burial caves within the conservation district, cave systems with extensive archaeological evidence, thousands of pahoe pits used for ua'u bird catching, ahu with upright pōhaku, volcanic glass quarry sites, trails, cairns, and unique artifacts. Despite the Army's commitment to preserving these historic properties, many have been impacted or destroyed by military activities.



Additionally, PTA has revised the impact zone from its original footprint, decreasing the buffer area without formal documentation. Archaeological surveys conducted by previous cultural resource staff have documented numerous unexploded ordnance (UXOs) within training areas that were supposedly cleared. Furthermore, the state-leased lands are littered with remnants of ammunition, bomb materials, MRE trash, spent ammunition, abandoned military equipment, and other debris. Military archaeological features often contain trash deliberately concealed within cave openings.

Contrary to Army statements, depleted uranium (DU) has been identified at PTA. Independent UXO consultants have discovered 2-4 areas containing DU, yet the Army has downplayed the findings, stating that the amount is insignificant. This lack of transparency raises concerns about the Army's honesty and commitment to addressing potential environmental hazards.

The Final EIS is insufficient and should be rejected for the following reasons:

- Inadequate environmental and cultural impact analysis
- Lack of a comprehensive mitigation plan for cultural and natural resources
- Unaddressed concerns about depleted uranium contamination
- Incompatibility of military use with conservation district designation
- Conflict with the BLNR's constitutional duty to mālama 'āina

Huliauapa'a respectfully urges the Land Board to honor the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. The Army has not demonstrated the capacity or commitment to be responsible stewards of this sacred land, and the FEIS fails to adequately address these critical concerns.

Mahalo for your consideration,

Kelley Lehuakeapuna Uyeoka, MA  
Executive Director  
Huliauapa'a  
[www.huliauapaa.org](http://www.huliauapaa.org)

**From:** [Jadie Iijima](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for the Rejection of the Army's Final EIS Re: Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 8:26:45 AM

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

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

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

For example, the Army's actions have already resulted in the burning of nearly 20,000 acres, including designated critical habitat for native flora and fauna. This is unacceptable.

Additionally, the ongoing use of live-fire and bombing in the impact area raises serious concerns about environmental contamination, safety, and long-term degradation of both the land and water.

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

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

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

The DLNR's mission statement makes it clear: the department exists "[to] Enhance, protect, conserve and manage Hawaii's unique and limited natural, cultural and historic resources held in public trust for current and future generations of the people of Hawaii nei, and its visitors, in partnership with others from the public and private sectors." All of us who stand in opposition to the military's continued retention of Pōhakuloa are asking simply for the BLNR to keep its promise to the people of Hawai'i.

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

With Aloha,

Jadie Iijima Geil  
Liliha-Kapālama, O'ahu

**From:** [Patricia Ikeda](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D1 Army EIS - Pohakuloa  
**Date:** Thursday, May 8, 2025 8:35:14 AM

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REJECT ARMY EIS AT POHAKULOA!

For reasons:

- \*. Military has never been respectful of our Cultural, environmental and health concerns.
- \*. Desecration of Hawaiian lands
- \*. Stop the bombing at Pohakuloa - DU radiation reality - no cleanup.
- \*. No EIS performed.
- \* WATER source is being compromised.
- \* Military takeover of Hawai'i - NO!
- \*. Nothing done to protect Hawai'i's natives species.
- \* The Hawaiian community is saying NO! To the bombing of Pohakuloa, to the military presence on Mauna Kea, the blatant lack of respect and down playing our concerns.

Respectfully submitted,

Patricia P. Ikeda  
Mauna Kea Ohana



**From:** [Marissa Ing](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:38:57 AM

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*Aloha e Chair Chang and Members of the Board of Land and Natural Resources  
My name is Marissa Ing and I am from Māhiki in Honolulu. I respectfully urge you to 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.*

Please help us protect and sustain our precious natural resources that are irreplaceable and mean much more than the premises politics. Please think of our keiki who will be left with the potential health and detriments to their health upon further damage to our aina.

*Mahalo nui for the opportunity to testify.*

*Sincerely,*

Marissa Ing



**From:** [Kaliko Inifi \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:00:32 AM

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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,  
[KALIKO INIFI]  
[Wai'anae, Oahu]

**From:** [Legacy Iosua](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] DO NOT want it renewed  
**Date:** Thursday, May 8, 2025 10:44:40 AM

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Aloha I am Legacy, a 14 year old student on O'ahu at Ka Waihona O Ka Na'auao which is a Hawaiian Charter School that focuses on Hawaiian culture. I do not want the lease to be renewed for the Pō'akahu or any other base on our 'Aina. As a child of this generation this is unacceptable to have the Army blow up our 'Aina, the 'Aina is our ancestors and us as Kānaka Moali we have birth rights to not let you do this to the 'Aina. First, I would like to bring up that I have seen my friends and classmates been priced out of the islands and while they are being priced out the Military is only paying \$1 please tell how and why. Also while they are paying \$1 for the base we are paying Thousands and if not Millions. Second, If you look at the Hawaii State Seal it says (Ua Mau Ke Ea O Ka 'Aina I Ka Pono) that means The life of the land is perpetuated in righteousness to put it my own words this means is that us as Hawaiian we have more rights than anyone else. This saying was said by our King, he fought for our land so I will fight for it too. We are apart of Hawaii, we are the people of these islands. I as the next generation of our people I am fighting for this to end. You are destroying my ancestors and our land. This isn't Mālama 'Aina. Our land and ancestors deserves better then what we are giving them. This is why I believe we should not let the Military renew the lease for Pō'akahu or any other part of our land.

**From:** [Kona Ishiki-Kalahele \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] testimony  
**Date:** Thursday, May 8, 2025 8:59:55 AM

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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,  
Kala'iokona Ishiki-kalahele  
O'ahualua

**From:** [jacquihoover@gmail.com](mailto:jacquihoover@gmail.com)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] BLNR Meeting - 09May2025 - SUPPORT PTA FEIS  
**Date:** Thursday, May 8, 2025 8:21:39 AM  
**Attachments:** [image001.png](#)

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Jacqui Hoover  
Email: [jacquihoover@gmail.com](mailto:jacquihoover@gmail.com)

08 May 2025

[blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

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

**Testimony in Support of the Pōhakuloa Training Area  
For consideration at BLNR Meeting – 09 May 2025**

Honorable Chairperson Chang and Members of the Board,

As a resident of Waimea, Hawai'i Island, member of the Chamber of Commerce Hawai'i's Military Affairs Council (MAC), former employee of the U.S. Department of Defense, and proud Native Hawaiian whose family members have served and are currently in military service, I am writing in full support of the U.S. Army's request to retain training lands at Pōhakuloa Training Area (PTA).

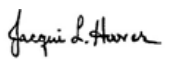
The ability to train year-round at PTA is essential to maintaining operational readiness and preparing our service members for the complex challenges they face across the Indo-Pacific. The unique terrain, scope, and location of PTA make it irreplaceable for joint exercises, disaster response, and mission-critical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

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

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

Thank you in advance for your time and consideration.

Sincerely,



**From:** [Papi Jackson \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Bombing of Pōhakuloa  
**Date:** Thursday, May 8, 2025 9:01:40 AM

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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.

Papalanimoku K. Jackson

Hālau Kū Māna Charter School

**From:** [Papi Jackson \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Bombing of Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:58:13 AM

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## **Stop the Desecration of Pōhakuloa, Urge BLNR to reject the Army's EIS!**

This Friday, May 9th at 9am the Board of Land and Natural Resources (BLNR) will convene for 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 (agenda item D1). The Army is seeking the renewal of a 65 year lease for a military training site on Hawai'i Island, which is set to expire in August, 2029.

**It is critical that the BLNR reject the current Army EIS.**

Please submit written testimony by May 8th, at 9am and if you are able, provide oral testimony in person or at the BLNR hearing this Friday, May 9th at 9am to urge the BLNR to reject the Army's EIS. Video testimony via zoom is also available.

### ***Why Should the BLNR Reject the Army's EIS?***

Inadequate Environmental and Cultural Impact Analysis:

The EIS is inadequate in addressing the environmental and cultural impacts to the area. Pōhakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. The Army has not demonstrated the capacity or will to serve as a proper steward of this land.

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.

Furthermore, the Army EIS does not provide a sufficient plan for mitigating the environmental and cultural impacts. Given the military's horrendous track record of cleaning up military debris and caring for the site, it is unrealistic to expect the military to comply with the requirements of a conservation district.

### ***The State has a Constitutional Obligation to Mālama 'Āina:***

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

In Kahaulelio v. DLNR, 2019, the Hawai'i Supreme Court found that the State of Hawai'i had 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 timely action after learning of possible contamination or violations; and document its efforts and provide transparency to the public.

### **Concerns Over Depleted Uranium Contamination:**

The presence of depleted uranium in the soil at Pōhakuloa is consistently churned up and aerosolized during live fire exercises and blown across the island. Exposure to depleted uranium is linked to cancer and many other negative health impacts.

## Military Use Conflicts with Conservation Land Use Designation

It is hard to conceive of any ongoing military use of the site that would be compatible with the site's designation as a conservation district. The proposed military uses of this site are simply incompatible with the conservation designation. Ongoing live-fire and bombing in the area threaten the native flora, fauna and cultural resources of the area, including some of Hawaii's most endangered species. The EIS does not provide specific or adequate mitigation measures to prevent impacts to the critical habitat or culturally significant sites.

## What You Can Do to Protect Pōhakuloa

To provide written testimony:

Submit written testimony via e-mail to [blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov) by May 8th at 9am, below is sample testimony, please personalize as you see fit.

To provide in-person testimony:

Attend live at 1151 Punchbowl St. Room 132 (Kalanimoku Building), Honolulu, Hawai'i.

Please arrive at least fifteen (15) minutes prior to the meeting start time in order to add your name to the sign-in sheet.

To provide video testimony:

Send your request to [blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov). Include your name and the agenda item on which you would like to testify (D1). Once your request has been received, you will receive an email with the Zoom link. Requests may be made during the meeting.

LIVE STREAM: <https://www.youtube.com/live/oWZU3uaHxp4>

## Sample Testimony:

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,

Papalanimoku K. Jackson

No Kalihi ma O'ahu mai au.

**From:** [John James \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:56:29 AM

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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,  
John William Keona James

Halau Ku Mana

Mahalo for taking action!

**From:** [Debi Javar](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [Jeremy Javar](#)  
**Subject:** [EXTERNAL] ARMY EIS. Agenda item D1  
**Date:** Thursday, May 8, 2025 9:04:26 AM

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PLEASE REJECT the armys EIS.

Pōhakuloa is conservation land..it should never be bombed ever.

Pōhakuloa is a sacred wahi Pana. We MUST MĀLAMA 'ĀINA. It should not be desecrated.

Mahalo.

Jeremy Javar

**From:** [Vision Jimenez \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:55:40 AM

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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,  
Kilo Jimenez  
Hālaūkūmāna Public Charter School

**From:** [Kamaka Jingao](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:39:19 AM

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Aloha kākou,

I am writing as someone who takes seriously our kuleana to care for Hawai'i's land and people. The Army's FEIS for Pōhakuloa does not meet the minimum standards of care or accountability. We all need to be stewards of our 'āina!

The land has been bombed, burned, and contaminated for decades. The EIS leaves out known burial sites and fails to provide a clear plan for cleanup. If accepted, this EIS sets a precedent for more harm across Hawai'i.

As a steward of this 'āina, I urge you to reject the EIS.

Please reject EIS!

Aloha 'Āina,

Kamaka Jingao  
Father, husband, decendent of Kohala, and preserver for our keiki!

**From:** [Hunter Johnson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Ancestor burial place  
**Date:** Thursday, May 8, 2025 11:47:07 AM

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Iwi hehi'ana and the pillikia caused by the bombing. A'ole lakou no ka mea 70 years of waste and no clean up o kou opala. Clean up and stop destroying our land, pls, mahalo.

**From:** [AnakeKuulei](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:48:05 AM

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Aloha,

I **reject** the Army's environmental impact statement (EIS) due to it being insufficient on several grounds:

- Fails to recognize that military use of this land is incompatible with the conservation designation
- There has been little to no transparency regarding both inspections and the procedures taken for clean up
- Fails to provide any sufficient records of archeological inventory and cultural artifacts
- Out-dated studies and records on endangered wildlife
- Fails to address concerns about depleted uranium on site
- Fails to comply with BLNR's constitutional duty to mālama 'āina

Furthermore, land desecration by military presence leaves generational scars for Kānaka Maoli. This harm has impacted us mentally, physically, emotionally and spiritually for **generations**.

I am a Kānaka Maoli and resident of Hilo, Hawai'i and again, I **reject** the army's insufficient EIS.

-Julia

**From:** [Leilani Lindsey Kaapuni](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony to the Board of Land and Natural Resources, May 8, 2025  
**Date:** Thursday, May 8, 2025 8:57:52 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of approximately 23,000 acres at Pōhakuloa Training Area. I urge the BLNR to reject this flawed document. As the body charged with fulfilling the State's constitutional mandate to "conserve and protect Hawai'i's natural beauty and all natural resources" (Article XI, Section 1), the Board has the authority and the legal obligation to deny acceptance of an EIS that fundamentally fails to meet the standards established in HAR § 11-200.1-13 for content requirements of environmental impact statements.

As a Wai a Kāne practitioner, I am deeply concerned about this EIS's alarming failure to adequately address threats to Ka Wai Kapu a Kāne—our sacred water sources. Research has confirmed what our ka'ao and mele have told us for millennia—the existence of an extensive freshwater aquifer beneath Pōhakuloa. Sitting at approximately 4,500 feet elevation, it has been described as "one of the most pristine aquifers in Hawai'i" that is "the deepest, the widest" on the island, vital to our water security and cultural practices. The continued use of live-fire training and bombing in this sensitive area poses a risk of contamination to these irreplaceable water sources that sustain life throughout Hawai'i Island. In 2022, the Army admitted in draft environmental documents that their activities "may have impacts on soils within the confines of the State-owned land; however, potential impacts to water resources could reach beyond the State-owned land to include the regional aquifers and watersheds." The presence of depleted uranium and other military contaminants that become aerosolized during exercises threatens not only the immediate environment but also the purity of these deep waters that connect through complex geological systems. The Red Hill water crisis demonstrates how catastrophic military contamination of our aquifers can be, and we must not risk another such disaster at Pōhakuloa. If we have learned anything from the Red Hill water crisis, it is that we cannot trust military assurances about protection of our water and we cannot wait until after contamination has occurred to take action.

This EIS is fundamentally incomplete, lacking essential cultural and archaeological surveys. It fails to address funerary objects found in 2022 and removed by the Army, that remain housed in PTA offices. In a May 8, 2025 interview by Mahealani Richardson of Hawaii News Now, Alice Roberts, U.S. Army Pacific Land Retention Program Manager, falsely stated that lineal descendants did not want discovery of burial objects included in the Army's EIS. As a descendant of iwi kupuna of Pōhakuloa present at those meetings, it was the unanimous decision of cultural and lineal descendants that no photographs be taken of sacred burial objects being held by the U.S. Army. However, this final EIS fails to include critical information about the presence of ancestral remains and funerary objects at Pōhakuloa.

This EIS also fails to address threats to endangered species, cultural resources and practices, and turns a blind eye to the ongoing accumulation of dangerous munitions on public land. In 2022, Hawaii state agencies including the Department of Land and Natural Resources and the Office of Conservation and Coastal Lands submitted "blistering comments" on the Army's draft EIS, identifying numerous adverse impacts to wildlife, archaeological assets, and cultural resources. The Office of Conservation and Coastal Lands was "alarmed" at the number of dump sites at Pōhakuloa and stated bluntly that the Army's claim of compliance with

conservation district rules was "an incorrect statement." Additionally, the 2019 Hawaii Supreme Court ruling (Kahaulelio v. DLNR) unanimously found that the State breached its trust duties by failing to properly monitor and inspect the lands at Pōhakuloa, allowing the area to fall "into ruin" through neglect and military misuse.

As affirmed by the Hawai'i Supreme Court in Kahaulelio v. DLNR (2019), the State has "the highest duty to preserve and maintain the trust lands" rooted in the constitutional obligation to mālama 'āina. This landmark ruling emphatically established that military usage of Pōhakuloa is fundamentally incompatible with the land's conservation district designation. The Army's documented history of environmental negligence is extensive - nearly 900 recorded fires since 1975 attributed to military actions, the burning of nearly 20,000 acres including critical habitat for native flora and fauna, the presence of depleted uranium, and the ongoing threat from unexploded ordnance.

Given this pattern of destruction and disregard, I urge the BLNR to fulfill its constitutional duty by rejecting this inadequate EIS and preventing further degradation of our sacred lands and waters. I ask that any future decision-making regarding Pōhakuloa be held on Hawai'i Island, allowing those most directly impacted to speak to decision makers. The protection of Pōhakuloa and Ka Wai Kapu a Kāne is not just an environmental issue but a matter of justice for Hawai'i's present and future generations.

Me ke aloha 'āina,

Leilani Lindsey Ka'apuni

Pi'ihonua, Hilo, Hawai'i

**From:** [Nohea Ka'awa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D-1: REJECT the U.S. Army's deficient Final Environmental Impact Statement (FEIS)  
**Date:** Thursday, May 8, 2025 8:14:22 AM

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Testimony to deny the U.S. Army's Final Environmental Impact Statement (FEIS) for its continued use of stolen, "ceded" lands in the Pōhakuloa Training Area and testimony in Strong Opposition to the Renewal of the U.S. Military Lease at Pōhakuloa Training Area (PTA), Hawai'i Island, Moku o Keawe.

Aloha BLNR,

My name is NOHEALANI KA'AWA, a resident of Pālauhulu Ahupua'a, Ka'ū, Moku o Keawe, deeply concerned about the environmental, cultural, and moral consequences of the continued use of Pōhakuloa Training Area (PTA) by the U.S. military. I write in strong opposition to the acceptance of the U.S. Army's Final Environmental Impact Statement (FEIS) and I am against the proposed renewal of the military lease on these sacred lands.

For over half a century, the U.S. military has used over 100,000 acres at Pōhakuloa, lands seized under the guise of national defense, for live-fire training exercises and bomb testing. In that time, the area has suffered immense, and in most cases irreparable, damage. Toxic materials, including depleted uranium, have been found in the soil. Endangered species have lost habitat. Sacred Native Hawaiian sites, wahi pana, burials, and cultural resources, continue to be desecrated. These actions represent not just ecological violence, but cultural erasure.

Critically, Pōhakuloa sits in a highly sensitive watershed region between Mauna Kea and Mauna Loa. The training area overlaps with one of Hawai'i Island's most important aquifer recharge zones. Continued military activity poses a grave threat to the purity and safety of our island's drinking water. Contaminants from decades of bombing, including heavy metals and radioactive material, risk seeping into the groundwater that nourishes our farms, feeds our families, and sustains our ecosystems.

Water is life, water is our true wealth. To endanger our aquifers is to gamble with the future existence of the entire island. Has anyone not learned from what we've all been and are still going through with Kaho'olawe?

The military has shown a pattern of neglect and disrespect toward this land, its people and mostly us Kanaka Maoli o Hawai'i. Military has failed to adequately clean up contamination, monitor environmental impact, or engage in meaningful consultation with Native Hawaiian communities. To approve the acceptance of this FEIS and the renewal of this lease would be to reward a legacy of environmental abuse and colonial occupation.

This is not just about land. It is about sovereignty, about accountability, and about our collective responsibility to future generations. The people of Hawai'i have spoken time and again, through peaceful protests, public and written testimony, and legal action, that enough is enough. Our islands should not be sacrifice zones for imperial ambitions. The Army has not followed even the most basic requirements from the DLNR.

We must imagine a future for Hawai'i that is not shackled to militarism, but rooted in Aloha

‘Āina. We must invest in restoration, not destruction; in healing, not harm and we must defend the sacred waters that give life to our people and land.

BLNR, I urge you, do not accept the Army’s (FEIS) Final Environmental Impact Statement. Do not allow a renewal lease at Pōhakuloa. Let this be the moment we choose justice over convenience, life over weapons and Aloha ‘Āina over everything.

Mahalo for the opportunity to testify.

Aloha ‘Āina ‘oia ‘i‘o,

NOHEALANI KA‘AWA



**From:** [Kenzie Kahale-Alexander](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject EIS for Pohakuloa  
**Date:** Thursday, May 8, 2025 10:36:21 AM

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May 9, 2025

Aloha e Board Members,

I am writing to express my strong opposition to agenda item D.1. I strongly urge you to vote against the acceptance of the FEIS that the US Army submitted on April 18 before the 30 day deadline has passed. Allowing such a careless and egregious Environmental Impact Statement to be accepted will erode accountability and transparency in the management of lands that are crucial to our communities, natural resources, and cultural practitioners. It is my position as a beneficiary and lineal descendant of the Kanaka Maoli people that these lands are seized Hawaiian Kingdom Crown and Government lands and are not for any department of the State of Hawai‘i to lease or otherwise transfer to the US military at all.

The FEIS that is being proposed by the Army is just as incomplete as the original draft that was proposed two years ago. The Army has failed to address key concerns such as cumulative environmental impact, the impact on the water table not only from toxic run off such as lead, depleted uranium, and white phosphorus but also the impact of bombing a central water aquifer for the last 60 years. Other concerns that have been voiced many times include the cultural impact on Kanaka Maoli being forcibly dispossessed from our energetic piko, cumulative impacts that the so called training within Pohakuloa has had on endangered species which the Army is obligated to mitigate, the UXO in Pohakuloa and the Armys' inability to clean up or restore any of the occupied lands to their original conditions, not to mention that to the publics knowledge, the Army has failed to pay the rental fee of one dollar for 65 years.

The Armys' failure to properly address any of these issues puts their disregard for the rights of Kanaka Maoli and their obligation to malama aina as the current tenant on full display. This Board therefore, has the kuleana of safeguarding the lands that are held in the trust of the State for the benefit of the people of Hawaii. I ask you now: how does the bombing of our land, the poisoning of our air and water, and the disconnection from our iwi kupuna and sacred sites benefit anybody, be they Kanaka or haole?

I wish to also strongly emphasize that the Armys' irreverent destruction of our sacred spaces here in Hawaii Nei is deeply reminiscent of the illegitimate state of israel's destruction of Gaza, Palestine. I have no doubt that if it were allowed, all branches of the US occupational military would play whatever war games and drop whatever bombs suited them at any time with impunity, much as we see happen every two years with RIMPAC. The people of Hawaii would surely benefit from clean waters, lands and air, and we all know that the military will never provide those things since they are in direct opposition to the function of the US Military Industrial Complex. The time to end the destruction and desecration has long since passed, but it is never too late to uphold morality and ethics over profit and imperialism.

In closing, I strongly urge the Board to remember the Hawai‘i State Supreme Court determination that the State of Hawai‘i has an obligation to uphold the principle of "mālama ‘āina" and ensure the protection and stewardship of the lands entrusted to its care, including those leased to the military. The Board must take this kuleana seriously and vote no on agenda item D.1.

Moving forward, it is the demand of Hawaiinui people that Board meetings concerning this issue be held ON Hawaiinui instead of putting the burden of travel onto kupuna, Kānaka, and other concerned residents. This burden is undue and while written and virtual testimony is an option, we all know that those are not the equivalent of addressing the Board alo i ke alo. If the Army can have their scoping meetings in Waimea, then surely the State department dedicated to the management of our lands and waters can find a way to allow the people of Hawaiinui to properly address this issue.



**From:** [Maralei Kahawai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, May 8, 2025 8:52:12 AM

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Aloha,

I am writing to ask you to reject the army's final EIS. As a child, my dad used to hunt the lands the army now uses for bombing practice. He's no longer here so I'm continuing his work of protesting the desecration of Pōhakuloa.

Mahalo,  
Maralei Kahawai

**From:** [keliiikeole kalauokaaea-kahele](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Aloha!!!!  
**Date:** Thursday, May 8, 2025 8:10:04 AM

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Aloha kakou,

Pehea oe? How are u doing? I would like to submit my testimony in total disagreement and very against the of allowing the Federal government to renew its lease of 23,000 acres up pohakuloa, stopping the destruction and desecration of our 'Āina in Our Home we call HAWAI'I!!! A'ole pono!!!! The military should have never Been able to lease 23,0000 for a dollar a year, Using it as Target practice with the Riisk of destroying Our fresh water source aquifer that supplies Our Hawai'i island. The military has destroyed Kaho'olawe and it will never be the same and yet BLNR should be protecting Hawaiian land from military destruction for the same of training( not in Our home land). Hearing and feeling the land Shake when training is taking place saddens me that this federal government is abusing the use of pohakuloa. As a beneficiary still waiting on the Hawaiian homestead list i would like to propose that myself and whomever else who is on the list the option of leasing the 23,000 Acres to preserve and protect for Our future generations to come. This is the same military that took part in the illegal overthrow of our Queen Lili'uokalani and her Hawaiian kingdom, the US that continues to illegal occupy Our home for the past 132yrs and counting, selling and leasing land that they dont own, Our people are forced to move because of cost of living and occupied land on every island by the military ( 1,000's of Acres accomidating their lives). Military should get out of Hawai'i, the Hawaiian Kingdom should be restored, there is no treaty of annexation that took place, we shouldnt even be having this discussion because America has no jurisdiction in Hawaiian Kingdom.. mahalo

Mahalo Ke Akua,

Keli'i Kalauokaaea kahele

[Sent from Yahoo Mail for iPhone](#)

**From:** [Matthew Kahooohanohano](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda item D-1  
**Date:** Thursday, May 8, 2025 10:51:39 AM

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As a lifelong resident of Hawai‘i, I cannot stand by while our sacred lands are desecrated. The Army’s FEIS is incomplete and unlawful. Please reject Agenda Item D-1 and uphold your duty to protect our ‘āina.

**From:** [JK W](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony - Pōhakuloa Re: Army's Final Environmental Impact Statement (FEIS)  
**Date:** Thursday, May 8, 2025 8:22:20 AM

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

I write to you today with deep concern and unwavering opposition to the U.S. Army's proposal to retain leased lands at Pōhakuloa Training Area. I urge you to reject the Army's Final Environmental Impact Statement (FEIS) and stand for the protection of Hawai'i's sacred lands, waters, and people.

Pōhakuloa is not just land—it is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of the most endangered species in the world. The Army has repeatedly demonstrated that it is not a responsible steward of this land. The FEIS fails to meaningfully address the irreversible damage already done, let alone provide a credible plan for future protection.

Let us not forget: the Army has already burned nearly 20,000 acres of land at Pōhakuloa, including critical habitat for native flora and fauna. Live-fire exercises, bombing, and the use of depleted uranium have contaminated the soil and water, threatening ecosystems and public health

Across Hawai'i, the military's legacy is one of desecration and destruction:

- Kaho'olawe was bombed into ruin, its soil poisoned and its waters polluted.
- Pearl Harbor and surrounding areas were used to dump radioactive waste and chemical weapons, including mustard gas and hydrogen cyanide <sup>①</sup>.
- At Pōhakuloa, depleted uranium rounds were fired and never fully accounted for <sup>①</sup>.

This is not stewardship. This is occupation and exploitation.

The Army's FEIS is incomplete, inadequate, and unacceptable. It fails on multiple fronts:

- Insufficient analysis of environmental and cultural impacts
- No credible plan to mitigate or reverse the damage
- Failure to address contamination from depleted uranium and other toxins
- Incompatibility with the land's conservation district designation
- Violation of the BLNR's constitutional duty to mālama 'āina

Military training of this scale is fundamentally incompatible with conservation, cultural integrity, and aloha 'āina. Enough is enough.

I urge you to honor your kuleana to the land and the people of Hawai'i. Reject the Army's FEIS. End the lease. Begin the healing.

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

The knowledge of the Hawaiian people is vast and profound. Let us listen to it now.

With deep aloha and firm resolve,

Ka'imina'auao

Kahalu'u, O'ahu



**From:** [Kyle Kajihira](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D-1 Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 9:24:28 AM  
**Attachments:** [240531 LD Comments on 2nd Draft EIS for PTA \(part 1\) - signed.pdf](#)  
[240529 Draft LD Comment Letter\\_rkpk2.pdf](#)  
[2024-06-21 PTA 2nd DEIS\\_DLNR.pdf](#)

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To the Chair and members of the Board of Land and Natural Resources (BLNR)

Thank you for the opportunity to testify. I strongly urge the BLNR to REJECT the Army's Final EIS for Army Training Land Retention at Pōhakuloa Training Area due to its numerous deficiencies, many of which are documented in the staff submittal to the Board.

The Army failed to conduct a thorough survey and inventory of all cultural and archaeological resources and ecological resources at PTA, including executive order and fee simple lands that are physically and functionally connected to, but outside the boundaries of the leased parcels. The Army's proposed actions will have significant impacts on parcels outside the leased lands in question. These impacts must be factored into the analysis of cumulative impacts.

The Army failed to conduct a thorough investigation of the full extent of UXO and contamination impacts at PTA, on the leased as well as federal parcels. In terms of disclosure of the Army's impacts at Pōhakuloa, there is literally a large blank area on the map where no surveys have been conducted.

The EIS fails to disclose and analyze the impacts of the proposed method(s) of land retention. If this is a real estate issue, as the Army has repeatedly maintained, then the proposed method of retaining this land is key. It would be impossible to analyze the impacts of a real estate action without disclosing the real estate instruments under consideration. Given the complicated and traumatic history of land tenure in Hawai‘i, which goes back to the mahele under the Hawaiian Kingdom and the US-backed regime change in 1893, and given the fact that the leased parcels in question are Hawaiian trust lands (former government and crown lands) held in trust by the state of Hawai‘i, how the Army proposes to retain this land matters greatly and will have profound impacts on the community, especially Kānaka Maoli.

In my comments on earlier drafts of this EIS, I requested that the Army disclose the "Approval of Major Land Acquisition Waiver Request - US Army Hawaii Training Sites, Hawaii," (2018) by the Assistant Secretary of Defense and the "Memorandum: U.S. Army Hawaii Major Land Acquisition Proposal," (2017). I have also submitted FOIA requests for these documents. At a public meeting on the O‘ahu training land retention Draft EIS last year, the Army Training Land Retention Program Manager said that she would facilitate the release of these documents. However, to date, I have not received the requested information. In this Final EIS, the Army's response to my comment about the Major Land Acquisition Proposal is, "The Army Freedom of Information Act (FOIA) Library and FOIA Request process are available at: <https://www.rmda.army.mil/foia/RMDA-FOIADivision.html>." On multiple occasions the Army has failed to disclose this information to the public, which in my mind, constitutes a willful refusal.

So this final EIS is deficient because it fails to disclose crucial information about the proposed action.



Finally, I have questions and concerns about DLNR's process in reviewing the 2nd Draft EIS.

On June 3, 2024, the Land Division submitted its comments on the 2nd DEIS, which was signed by the Chair. (See attachment 1). It stated, "even if all the deficiencies noted below were corrected, the revised document would be much different from this second version and the Draft EIS would need to be republished."

But I received, through UIPA, a version of this same submittal, with red-line revisions. The line cited above was crossed out. (See attachment 2).

But in a June 18, 2024 version of the Land Division submittal, which was signed by the Land Division administrator and submitted as a package with other DLNR staff comments this passage was restored. (See attachment 3). Importantly, this package of comments were submitted AFTER the published public comment deadline. I have seen no public notification that the Army extended the public comment deadline.

Why did the First Deputy attempt to remove this critical conclusion from a document that was submitted to the Army? Why was the second Land Division staff comment signed by a different person? And how was DLNR able to recall its submitted comments and resubmit them after the public comment deadline had passed?

In closing, I urge the Board to REJECT the Army's Final EIS. And I urge DLNR officials to be more transparent about its discussions with the Army. Thank you for the opportunity to testify.

Sincerely,  
Kyle Kajihira

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Kyle Kajihira, Ph.D. (he / him)  
Assistant Professor, Department of Ethnic Studies  
University of Hawai'i at Mānoa  
[kkajihir@hawaii.edu](mailto:kkajihir@hawaii.edu)

**From:** [K Kalama](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Request to Defer Decision on the Final EIS for the Pohakuloa Training Area Long-Term Lease Renewal  
**Date:** Thursday, May 8, 2025 8:38:44 AM

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Aloha Chair Chang and Members of the Board,

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 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.

I also call on you to NOT renew their lease. Enough hurting the 'āina. We must let the 'āina heal.

Mahalo nui,  
Lela Kalama  
Keaau, HI

Sent from my iPhone

**From:** [Maui Kalauawa-Haupu \(2027\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] pohakuloa testimony  
**Date:** Thursday, May 8, 2025 8:02:47 AM

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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,  
Maui Kalauawa-Haupu

Kailua

**From:** [Avery Kamalu](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 9:45:04 AM

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

*My name is Avery Kamalu 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,  
Avery Kamalu*

Get [Outlook for iOS](#)

**From:** [Kekuhi Kanahele](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony to Reject the FEIS, Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:21:51 AM

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Aloha,

My name is Kekuhi Kanahele and I submit this testimony to ask that you reject the FEIS for the continued military use of Pōhakuloa. This document does not meet environmental, legal, or ethical standards expected in our state.

I urge you to reject the Final Environmental Impact Statement Agenda Item D-1.

Mahalo,  
Kekuhi Kanahele.

**From:** [Michelle Kanehe-Hudson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:32:04 AM

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Aloha Chair Case and Members of the Board

**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 properly steward this land, and the FEIS fails to address these concerns meaningfully.

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.

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

Inadequate Environmental and Cultural Impact Analysis ( the EIS excludes burial objects and cultural information that should have been included)

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

Concerns about depleted uranium on the site have gone unaddressed

Military usage is incompatible with the conservation district designation

The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina. The State of Hawai'i has a legal duty to preserve and protect trust lands (Kahaulelio v. DLNR, 2019).

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.

Keiki are learning about this and looking to us to model kuleana.

Mahalo,  
Michelle Kanehe-Hudson  
Ko'olaupoko, 'Oahu

**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,

I strongly urges you to vote to reject, or “not accept”, the Final Environmental Impact Statement (FEIS) for continued military use of Pōhakuloa. I reject this FEIS and oppose any new lease or retention by the U.S. Army for Pōhakuloa Training Area. The Army’s FEIS admits contamination at Pōhakuloa but refuses to study or clean it up. The Army refuses to attempt to prove pollutants haven’t reached water sources or ecosystems—because they haven’t looked. They obscure spill data, delete safety documents, and refuse to share basic procedures with the public. They have also never completed a comprehensive cultural inventory survey of their occupied lands. Pōhakuloa is known to harbor sacred and culturally significant sites and artifacts, but they would rather not look and add to their evidence of their crimes. They don’t care to check because they don’t care about their impact. Just this week it has been revealed that the Army concealed one of the most significant archeological discoveries this decade with wooden carvings being found in a lava tube on Pōhakuloa! This level of dangerous negligence cannot be enabled and allowed to continue.

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

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

I speak from direct experience of what happens when the U.S. military is not held accountable. In 2021, the U.S. The U.S. The Navy’s fuel storage facility at Red Hill contaminated O’ahu’s drinking water with 20,000 gallons of jet fuel, sickening hundreds, forcing families from their homes, and threatening our island’s most critical aquifer. I was involved in the efforts to shut down Red Hill, I have been inside the facility. Despite the U.S. Military claiming how crucial and state of the art this facility was, I have never seen a facility in such a state of disrepair. The Army’s leases are in a similar state, they do not care for the damage they cause, only that they get their way.

Despite clear evidence, the military denied, downplayed, and delayed at every step. They still haven’t taken full responsibility or completed the cleanup. This is not ancient history; it is still happening. Pōhakuloa is Red Hill in slow motion: toxic contamination, no accountability, and a refusal to tell the truth or clean it up. The same arrogance, secrecy, and violence toward our ‘āina and people are present here, too. We will not let it happen again.

Pōhakuloa is Hawaiian national land - seized under illegal occupation and bombed without consent. It is not a training ground. It is not the Army’s to destroy. Enough is enough. We urge the Board to reject this FEIS and oppose the retention of Pōhakuloa by the U.S. Army. Hawai’i deserves better than military occupation disguised as stewardship. Ua lehulehu a



manomano ka 'ikenā a ka Hawai'i. We know the truth.

**Me ka 'ōia'i'o,**

**Kawena Kapahua**

**Hui Aloha Aina o Honolulu**

**From:** [Alaka'i Kapanui](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony, Agenda Item D  
**Date:** Thursday, May 8, 2025 9:01:41 AM

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Mei 9, 2025

Aloha e Board Members,

I am writing to express my strong opposition to agenda item D.1. I strongly urge you to vote against the acceptance of the FEIS that the US Army submitted on April 18 before the 30 day deadline has passed. Allowing such a careless and egregious Environmental Impact Statement to be accepted will erode accountability and transparency in the management of lands that are crucial to our communities, natural resources, and cultural practitioners. It is my position as a beneficiary and lineal descendant of the Kanaka Maoli people that these lands are seized Hawaiian Kingdom Crown and Government lands and are not for any department of the State of Hawai'i to lease or otherwise transfer to the US military at all.

The FEIS that is being proposed by the Army is just as incomplete as the original draft that was proposed two years ago. The Army has failed to address key concerns such as cumulative environmental impact, the impact on the water table not only from toxic run off such as lead, depleted uranium, and white phosphorus but also the impact of bombing a central water aquifer for the last 60 years. Other concerns that have been voiced many times include the cultural impact on Kanaka Maoli being forcibly dispossessed from our energetic piko, cumulative impacts that the so called training within Pohakuloa has had on endangered species which the Army is obligated to mitigate, the UXO in Pohakuloa and the Army's inability to clean up or restore any of the occupied lands to their original conditions, not to mention that to the public's knowledge, the Army has failed to pay the rental fee of one dollar for 65 years.

The Army's failure to properly address any of these issues puts their disregard for the rights of Kanaka Maoli and their obligation to malama aina as the current tenant on full display. This Board therefore, has the kuleana of safeguarding the lands that are held in the trust of the State for the benefit of the people of Hawaii. I ask you now: how does the bombing of our land, the poisoning of our air and water, and the disconnection from our iwi kupuna and sacred sites benefit anybody, be they Kanaka or haole?

I wish to also strongly emphasize that the Army's irreverent destruction of our sacred spaces here in Hawaii Nei is deeply reminiscent of the illegitimate state of Israel's destruction of Gaza, Palestine. I have no doubt that if it were allowed, all branches of the US occupational military would play whatever war games and drop whatever bombs suited them at any time with impunity, much as we see happen every two years with RIMPAC. The people of Hawaii would surely benefit from clean waters, lands and air, and we all know that the military will never provide those things since they are in direct opposition to the function of the US Military Industrial Complex. The time to end the destruction and desecration has long since passed, but it is never too late to uphold morality and ethics over profit and imperialism.

In closing, I strongly urge the Board to remember the Hawai'i State Supreme Court determination that the State of Hawai'i has an obligation to uphold the principle of "mālama 'āina" and ensure the protection and stewardship of the lands entrusted to its care, including those leased to the military. The Board must take this kuleana seriously and vote no on agenda item D.1.

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**Aloha 'āina 'oia'i'o**  
**Kona 4 Palestine**  
**Three Mountain Alliance Foundation**

**Ka 'Ahahui Hawai'i Aloha 'Aina**

**From:** [Vahma Kamga \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:54:50 AM

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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,  
Vahma Karnga

Halau Ku Mana

## **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 Mahealani Kauahi, and I am a concerned Hawai'i Island resident, kanaka 'ōiwi, educator, and farmer. 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 Hawaiian national lands at Pōhakuloa.

These are not simply “state lands” — they are **seized 'āina**, lands taken without consent under an illegal U.S. occupation. The BLNR has a **legal obligation and a moral kuleana** to reject this FEIS and stand for justice, cultural integrity, and environmental protection.

The FEIS is deeply flawed. It fails to meet the standards of HRS Chapter 343, and it fails the people of Hawai'i. It does not demonstrate environmental accountability, cultural respect, or meaningful mitigation of harm. Instead, it attempts to greenlight further desecration.

**Key reasons for my opposition include:**

### **Toxic Contamination with No Cleanup Plan**

The FEIS acknowledges toxic waste — including lead, diesel, and ammunition remnants — but offers no credible plan for cleanup or monitoring. Ignoring the vulnerability of shallow aquifers endangers long-term water quality.

### **Wildfire Risk Largely Unaddressed**

With over **2,000 wildfires** since 1943, over half caused by Army activity, the FEIS's lack of comprehensive wildfire prevention is inexcusable, especially as wildfires worsen due to climate change.

### **Outdated Air Quality Data**

The last air quality monitoring was in 2007. The FEIS lacks current data to assess decades of combustion and environmental exposure for neighboring communities.

### **Insufficient Cultural Survey and Consultation**

The Army has not surveyed all lands for cultural and historic sites and has not engaged in full consultation with Island Burial Councils, despite acknowledging the presence of **iwi kūpuna**.

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

The Army has not disclosed a take permit for terrestrial endangered species at PTA. This absence shows a lack of accountability for ongoing harm to native species.

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

By narrowly focusing on just 23,000 acres, the FEIS ignores the broader impacts across over 110,000+ federally held acres — fragmenting the analysis and misleading the public.

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

These “ceded” lands are held in trust for Native Hawaiians and the public. Continued military use contradicts the state’s trust responsibility and perpetuates harm.

### **Incompatibility with Conservation Lands**

Large portions of PTA fall within the **Conservation District**, where military training — including live-fire and heavy vehicles — is inconsistent with legal land use. The FEIS fails to address this contradiction.

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## **REJECT THIS EIS. PROTECT ‘ĀINA. HONOR YOUR DUTY.**

This Board is not required to accept an FEIS that **fails to inform, fails to protect, and fails to uphold the law**. The Army has had decades to demonstrate responsible stewardship—and instead, it has left a legacy of harm. Now is the time to say: **no more**.

Please reject this FEIS. Stand for Pōhakuloa. Stand for Hawai‘i. Stand for our future.

**Mahalo for your time and consideration.**

**Me ka ‘oia‘i‘o,**

Mahealani Kauahi

Panaewa, Hilo, Moku o Keawe

**From:** [jme kawai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject army EIS - Pohakuloa  
**Date:** Thursday, May 8, 2025 9:31:48 AM

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Aloha,  
This is testimony to reject the Army's EIS for Pohakuloa. No, to renewing the lease.  
Mahalo!

ALOHA from my iPhone



Welina,

My name is Kapali Keahi and I urge the board to reject the military's EIS. The military has been bombing and destroying our aina for generations- when will it stop?

A true and accurate environmental and cultural study of Pohakuloa should have taken place before. Relying on the military to provide accurate information now is absurd. Which is to say, that numerous studies, cultural and traditional knowledge passed down through the generations already give us a sense that Pohakuloa is in serious danger of its own cultural and anthropological collapse. Moreover, overshadowing the impacts to the cultural integrity of Pohakuloa will be the environmental calamity and destruction just waiting to happen to its watershed.

In closing, it is clear that the board along with the other agency who is a signatory to the military's lease of Pohakuloa, are enabling a destructive force such as the u.s. military to continue to operate under the guise of protecting freedom. However, this only makes people turn a blind eye to our aina's destruction. Do the right thing! Reject the EIS. Do not renew the lease. Heal Pohakuloa.

Me ke aloha Aina,

Kap

**From:** [Nipuu Keahi-ng](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa  
**Date:** Thursday, May 8, 2025 8:39:06 AM

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As a resident deeply concerned about Hawai'i's resources, I urge you to reject Agenda Item D-1. The Army's FEIS fails to address decades of harm at Pōhakuloa and skips essential legal steps like cultural and environmental surveys.

Sent from my iPhone

**From:** [Pililuaikaiohilo Keala](#)  
**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 8:22:40 AM

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## **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 Dr. Pililuaikaiohilo Keala, and I am a Native Hawaiian mother, an educator, a cultural practitioner, and an assistant professor of Hawaiian Immersion at the University of Hawai'i at Mānoa. While I was raised in Mana'e, Moloka'i, I currently reside with my 'ohana in Kapālama, O'ahu. I write in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army's proposal to retain approximately 22,750 acres of seized Hawaiian national lands at Pōhakuloa. These are not simply "state lands"—they are stolen 'āina under illegal U.S. occupation. The BLNR has both a legal obligation and a moral duty to reject this FEIS and stand against the further destruction of our homeland.

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

### **The most egregious failures of the FEIS include:**

#### **Toxic Contamination with No Cleanup Plan**

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

#### **Fire Risk Minimization**

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

#### **Outdated and Insufficient Air Quality Data**

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

surrounding communities and ecosystems.

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

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

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

While the Army operates under an incidental take permit for RIMPAC in marine environments, there is no such permit disclosed for PTA. This means there is no accountability for the ongoing harm to endangered birds, plants, and other protected species — several of which are known to inhabit the leased lands.

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

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

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

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

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

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

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

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

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

Mahalo for your time and consideration.

Me ka 'ōia'i'o,

Pililuaikaiohilo Keala, EdD  
Kapālama, O'ahu, Hawai'i

*Pililuaikaiohilo M.Q. Keala, EdD*  
Assistant Professor, Hawaiian Immersion  
Masters of Education in Teaching Program, Cohort 72 Coordinator



School of Teacher Education  
Everly Hall, Room 222  
1776 University Ave, Honolulu Hawai'i 96822

*"I pa'a i kona kupuna, 'a'ole kākou e puka"*

**From:** [Des KK](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:01:54 AM

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

My name is Destinee Keawemauhili, and I am from Kea'au. I am writing to respectfully urge the Board REJECT the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa.

This is a step in the process that has MAJOR, LONGSTANDING impact for the wellbeing of our 'āina and everyone who resides here, especially Kānaka Maoli, and I am OUTRAGED that it needs to be pointed out that this EIS is INSUFFICIENT, as it fails to include thorough documentation of environmental, cultural, public health, and other impacts resulting from the Army's continued use of the 'āina. The full scope of the harm resulting from further "retention" must be considered.

I cannot adequately explain in words the pain I feel when I see and hear the bombs going off at Pōhakuloa while being immersed in the mana of the 'āina. I have tears in my eyes just thinking about it. The FEIS does not acknowledge this harm. What hurts more is knowing that historically, the United States Army has not honored commitments it made for the care of the land it leased, and yet "retention" is still a consideration. Kaho'olawe prime examples of this, and even after decades of remediation efforts and hundreds of millions spent, 25% of the island is uncleared, according to an article, "The bombing of Kaho'olawe went on for decades. The clean-up will last generations" written by Lacy Deniz on February 27, 2018. Remediation efforts are costly, and while waiting for the United States Army to take action, our people pay for it with their health.

I believe that REJECTING THE FEIS is a small step in shutting down this attempt by the United States Army to continue to desecrate our 'āina and beginning to heal our 'āina and our people. Please consider the health of our 'āina first, which is key to health of us all. The United States has treated our 'āina as disposable, and I fear the kind of continued harm that will be done if COMPLETE INFORMATION IS NOT AVAILABLE to consider when making such a MAJOR DECISION about Pōhakuloa.

I appreciate the opportunity to testify and the Board's commitment to protecting the 'āina for the prioritizing the well-being of all.

Mahalo,

Destinee Keawemauhili

**From:** [Honokaa People's Theatre](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Please vote no to Pohakuloa EIS/May 9 Item D-1  
**Date:** Thursday, May 8, 2025 11:54:47 AM

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Aloha Esteemed DLNR board members,

Thank you for your volunteer service on this Board, I know this issue is one of many difficult ones you are tasked with, but please vote no for the Pohakuloa EIS on May 9 as many folks much wiser than I are urging you to do due to shortcomings and failures that must be addressed. We appreciate your work on this and hope for a safer and more pono Hawaii for all.

Mahalo for your time,  
Phaethon Keeney

**From:** [Ohana Kekua](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 9:36:27 AM

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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.

I think at this point you've received many emails stating a similar opinion. As a kanaka oiwi we should not be opposing each others decisions and the only decision that matters is the one of our aina.

Continuously the people in seat to make decisions do not out our aina first. Our kupuna have fought so hard to keep us here to do what is right for this space we are grateful to have come from and why is the military allowed to desecrate this wahi that we hold as high was we do our most respected and honored kupuna.

This aina is our kupuna. It is with a heavy heart to hear that the military is being allowed by a board that is supposed to represent our Hawaii to desecrate her, poison our land and our water.

Do what is right and do not renew the military lease at Pohakuloa and all other military training spaces in Hawaii.

Me ka oiaio  
Ohelo Kekua  
Moku O Kakuhihewa



**From:** [Tayzlyn Kekumu \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, May 8, 2025 8:50:35 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the proposed military training on leased lands at **Pōhakuloa Training Area**. **the Army's EIS.**

Pōhakuloa is not just a piece of land—it is a home to irreplaceable **Native Hawaiian** and most **endangered species**. The Army has failed to serve as a proper steward of this land, and this project raises serious concerns.

For example, the Army's actions have already impacted **20,000 acres**, including designated **critical habitat**. This impact is unacceptable. Additionally, the ongoing use of the area raises serious concerns about **environmental** and **long-term degradation** of both the land and the community.

Military training activities of this scale are inconsistent with the values of cultural integrity, or **aloha 'āina**. Enough is enough.

The FEIS is insufficient and should be rejected.

- Inadequate Environmental and Cultural Resources
- Lack of a sufficient plan to mitigate impacts



**From:** [Tiana K Kennedy](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT THE US ARMY'S FINAL EIS  
**Date:** Thursday, May 8, 2025 8:06:33 AM

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To whom this may concern,

I am Tiana Keli'ikuli-Kennedy and I am a resident of the Moanalua ahupua'a on the island of O'ahu. I am testifying on why BLNR should REJECT the United States Army's final EIS. I've listed my reasoning below:

- Pōhakuloa is Hawaiian land— land that the United States Army continues to desecrate (see also: the bombings on Kaho'olawe).
- The United States Army confirmed that there was widespread contamination in and around the Pōhakuloa training area, but refuses to assess and/or clean up their mess.
- Despite this confirmation, the US Army won't share safety procedures or spill data. They also delete or remove critical information from public records. They cannot prove that contamination hasn't spread to water and/or ecosystems.
- The Army's final EIS evades Hawai'i law by ignoring the obvious environmental impacts.

It is for these reasons and more that I am pleading for BLNR to REJECT THE UNITED STATES ARMY'S FINAL EIS.

Ua mau ke ea o ka 'āina i ka pono! Mai poina!

Mahalo for your time,  
Tiana Keli'ikuli-Kennedy

**From:** [Lorilani Keohokalole](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Strongly Oppose on Testimony Agenda item D1  
**Date:** Thursday, May 8, 2025 8:07:22 AM

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Aloha mai kākou,

**We are submitting testimony as Lorilani Keohokālōle and J. Kapule Torio, Jr,**

We reside in Wailua Uka, on the island of Kauai, Kamawaelualani. Our lineages trace back to moku(s) of Hawai'i Island and we bring this testimony forward as lineal descendants.

Our 'ohana **strongly opposes** more time for the military leases once these time out. We stand, alongside our Children: Kawaiolaakapulelani; Pilipa'akapoli, Laua'eokamawaelualani, and Pi'ilani to ask that you humbly and courageously STAND with the generations of keiki that will either benefit or rise up to meet the decisions you make today.

This below, is in alignment of why we believe you also need to strongly oppose and support the needs of our communities as well as enact clean up.

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.

In *Kahaulelio v. DLNR*, 2019, the Hawai'i Supreme Court found that the State of Hawai'i had 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 timely action after learning of possible contamination or violations; and document its efforts and provide transparency to the public.

**From:** [Sierra Keolanui](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:25:27 AM

---

Good Morning,

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

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

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

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

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

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

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

Me ka ha'aha'a,  
Sierra Justine Pu'uwaialoha Keolanui

**From:** [Joy Kin](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:52:35 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.

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

Concerns about depleted uranium on the site have gone unaddressed

Military usage is incompatible with the conservation district designation

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

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

process of healing and restoration.

Sincerely,

Joy Kin  
(They/She)  
[kin.sjk@gmail.com](mailto:kin.sjk@gmail.com)  
2489788162

**From:** [Rachel Kingsley](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Regarding 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 Hawaii  
**Date:** Thursday, May 8, 2025 11:56:21 AM

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To Whom It May Concern,

I am writing to urge you the members of the board to not accept the final EIS for the Army Training Area at Pōhakuloa Training Area. As someone who works daily on the slopes of Mauna Kea I witness, hear, and feel the almost daily detonation and firing of missiles, bombs, and other explosives on this aina. I have witnessed the fire risks, dust storms, and damage done to the landscape. I have seen the encroachment of non-native and invasive grasses and plants into critical habitat for native and endangered species. The current practices of PTA are not that of a good steward. The final EIS as it is currently written is not comprehensive enough to account for or mitigate the actions taken by this entity. I strongly urge you all to push for better stewards for the aina and natural resources at Pōhakuloa.

Mahalo,  
Rachel

Rachel Kingsley  
Ornithological Field Technician  
Mauna Kea Forest Restoration Project



**From:** [Traci Kiyama](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Stop bombing Pōhakuloa  
**Date:** Thursday, May 8, 2025 9:03:36 AM

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Please do not allow the army to continue bombing Pōhalukoa. I am a teacher at Punahou School and know this harms the land and water. I want a safe place for my students and for me to live.

Thank you.  
Traci Kiyama  
Honolulu, HI

**From:** [Shalimar Kluck](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa  
**Date:** Thursday, May 8, 2025 10:48:23 AM

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Dear BLNR Leadership,

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

Please reject the EIS.

Mahalo,  
Shalimar Kluck  
O'ahu Resident

**From:** [Joseph Kohn MD](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D-1 REJECT INADEQUATE EIS for POHAKULOA  
**Date:** Thursday, May 8, 2025 10:38:44 AM

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D-1 REJECT INADEQUATE EIS for POHAKULOA  
Stop Poisoning The 'Āina

Joseph Kohn MD  
Founder, We Are One, Inc. - [www.WeAreOne.cc](http://www.WeAreOne.cc) - WAO  
493 Pio Dr Apt 209  
Wailuku, HI 96793-2641  
808-359-6605  
[Joseph@WeAreOne.cc](mailto:Joseph@WeAreOne.cc)  
[www.WeAreOne.cc](http://www.WeAreOne.cc)

**From:** [Kawailehua Kuanoni](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testify against us military  
**Date:** Thursday, May 8, 2025 8:21:47 AM

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Aloha, we want to push this envelope and stop the United States Military from further desecration on our 'Āina Kupuna. Mahalo kako'o. Imua nā Kanaka! Stop stop stop  
Sent from my iPhone

**From:** [em.labrada](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa lease  
**Date:** Thursday, May 8, 2025 8:28:15 AM

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

**Date: May 8th, 2025**

**Aloha Chair Chang and Members of the Board,**

My name is Emma Labrada, and I am a member of the Hilo community. 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 is the land that feeds us, that provides us water. We cannot accept the horrible conditions that the US Military complex has left it in. It is despicable and disgraceful. They have gotten away with poisoning our 'āina for decades. It needs to end now.

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. They never have. This is the chance to reprimand them for this utter disregard for life in the pursuit of a war complex.

**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. Stand for our water, the ancestors, the birds and soil. We cannot feed ourselves with fire retardant and weapons.

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,

Emma Labrada  
Hilo, Hawaii  
Community Member

**From:** [Abcdee Lacaden](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa written testimony  
**Date:** Thursday, May 8, 2025 11:56:10 AM

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

*My name is Abcdee Kinohiloa Lacaden and I am from Ewa Beach, HI. 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,*

*Abcdee Kinohiloa Lacaden*

Sent from my iPhone

**From:** [dalusional@hawaiiintel.net](mailto:dalusional@hawaiiintel.net)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa  
**Date:** Thursday, May 8, 2025 9:02:25 AM

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To whom it may concern,

I am submitting my testimony against the extension of the lease. The Hawaiian People should not have to endure this bullying of our land.

Mahalo,

Kathleen Lacerdo



**From:** [Abigail LaFleur-Shaffer](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT the Army's Final EIS  
**Date:** Thursday, May 8, 2025 7:59:45 AM

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Hi,

I hope that I'm not too late to submit my testimony, but I URGE firmly that the BLNR reject the U.S. Army's FEIS. It is important to continue preserving and protecting nature, land, and culture.

Thank you,  
Abigail LaFleur

**From:** [Inez Larson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:41:03 AM

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

My name is Inez Z Larson, and I am from Honolulu, Hawai'i. I'd like to ask 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 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,

Inez Z. Larson

Undergraduate: Bachelor's in Hawaiian Studies - Mo'olelo 'Ōiwi

2888 Uē ka lani, ola ka honua. When the sky weeps, the earth lives



74 Kihapai Street,  
Kailua, HI 96734  
Ph: 808.346.3239  
Em: kailaw.la@gmail.com

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To Whom It May Concern:

'O Kai Lawrence ko'u inoa. Noho au ma Makiki, Oahu. 'O Ka'eleloli ku'u ua a me ku'u makani.

My name is Kai Lawrence and I am the surfing lawyer. I am also Kanaka 'Ōiwi. I write today in solidarity with Lāhui asking this agency, BLNR, to reject the military's EIS for the bombing of Pohakuloa.

It is incredible to me that I have to write that sentence, asking you all to “reject [...] the bombing of Pohakuloa.” It is incredible to me that the bombing of sacred and living places, our mother earth, our nurturer, our provider, our mother, is still a thing. We live in a world where no one, except the rich elite and government leaders, wants to push the war machine. This should be enough to stop the above-mentioned bombing.

But beyond that, the bombing of our sacred islands is so antithetical to our place here on earth. Our current administration would have us think that humans are above nature, and here to subdue it. But they forget that we are nature. We are one piece of it in the larger landscape. So, to bomb Pohakuloa is to commit an abomination, to go against our nature and our purpose here.

Indeed, the original instructions to man are to learn to walk on the earth so that each step is a greeting to her. What would the earth think of humanity? Are we keeping up our end of the bargain? Is the earth made better by our presence here? So far, the answer is no. So far, continuing to bomb is a shame.

I therefore urge you, together with my brothers and sisters in Aloha, to reject the EIS and halt any future bombing of this sacred āina.

Mahalo Nui.

Sincerely,

---

Kai Lawrence  
The Surfing Lawyer  
Kanaka 'Ōiwi

**From:** [Tiare Lawrence](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D1  
**Date:** Thursday, May 8, 2025 8:21:16 AM

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Aloha Chair and Members of the Board,

My name is Tiare Lawrence. I was born and raised in Hawai‘i and have dedicated my life to protecting our ‘āina and our people. As a community organizer, I’ve stood with thousands who are rising up to say enough is enough. I strongly oppose Agenda Item D-1 and the Army’s Final Environmental Impact Statement (FEIS) for the continued military occupation of Pōhakuloa.

We cannot talk about Pōhakuloa without naming the legacy of military destruction across our islands. The U.S. military poisoned our water at Red Hill—putting thousands of families at risk. They bombed Kanaloa Kaho‘olawe until the island was uninhabitable, leaving it scarred with unexploded ordnance. And now, with Pōhakuloa, they continue this pattern of desecration—bombing sacred ‘āina, hiding data, refusing cultural consultation, and treating Hawaiian lands like sacrifice zones.

This FEIS is not a serious document—it is a smokescreen. It fails to include biological or cultural surveys. It avoids accountability. It ignores our people, our history, and our laws. The military has shown time and time again that they do not deserve our trust.

As someone who organizes in communities across Hawai‘i and reaches hundreds of thousands online, I can tell you this: the people are watching. The people are rising. We will not sit quietly while another 65 years of destruction is rubber-stamped by a board that is supposed to protect us.

You have a choice today—to follow the law, honor the ‘āina, and stand with the people. Or to uphold the same systems that have poisoned, bombed, and erased us. I urge you: reject Agenda Item D-1. Return Pōhakuloa to the people. Let the land finally heal.

Mahalo nui,

Tiare Lawrence

**From:** [Kekaimalino Mcshane Iehano](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] testimony  
**Date:** Thursday, May 8, 2025 8:55:38 AM

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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,

[Shane Kekaimalino Mcshane Lehano]

[Optional:Kalihi,Oahu]

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[Shane.Lehano@halaukumana.org](mailto:Shane.Lehano@halaukumana.org)

**From:** [kealoha letisi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written testimony  
**Date:** Thursday, May 8, 2025 9:05:37 AM

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Aloha Land Board Members,

My name is Kealoha Letisi, and I stand in firm opposition to the Army's Environmental Impact Statement regarding the continued use and expansion of the Pōhakuloa Training Area on Hawai'i Island.

For over 70 years, the U.S. military has used Pōhakuloa for live-fire training, bombing exercises, and the testing of munitions — including those containing depleted uranium. These activities have caused irreversible harm to our 'āina, including soil contamination, unexploded ordnance, and the degradation of native ecosystems. The Army's own records show that they cannot account for the full scope of environmental damage, and cleanup efforts remain insufficient and inconsistent.

Pōhakuloa is not just barren lava — it is a wahi pana, a sacred and storied place in our mo'olelo, connecting Maunakea and Maunaloa, the wao akua and wao kanaka. Cultural sites, including ancient trails, shrines, and burial areas, lie within or near PTA boundaries. These places have been desecrated or rendered inaccessible due to military occupation. The Army's EIS does not adequately address this ongoing cultural erasure nor its responsibility to mālama these sacred spaces.

Moreover, the continued military use of this land perpetuates a historical pattern of occupation and exploitation. Generations of kānaka 'ōiwi have protested the misuse of our lands and called for their return and restoration. Leasing or extending military control over these lands would be a betrayal of the public trust and the constitutional mandate to protect Native Hawaiian cultural and natural resources.

I urge you, as stewards of Hawai'i's lands, to reject this EIS. Let us not sacrifice further acres of sacred 'āina for militarization. Instead, let us move toward healing, accountability, and aloha 'āina.

Mahalo nui,

Kealoha Letisi

**From:** [taisa letuli](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony in opposition to the approval of the Army's FEIS, Meeting Item D-1, 5-9-25  
**Date:** Thursday, May 8, 2025 9:38:21 AM

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

My name is Teziahlon Letuli-Tua'i. I am from Wai'anāe, and I am writing to express my strong opposition to the approval of the Army's Final Environmental Impact Statement (FEIS) for the Pōhakuloa Training Area (PTA).

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

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

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

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



Ke aloha ‘āina,

Teziahlon Letuli-Tua’i

**From:** [Kekoa Lewis \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:53:22 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.

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

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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,  
Kekoa Lewis  
Hālau Kū Māna



**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
560 N. NIMITZ HWY., SUITE 200  
HONOLULU, HAWAII 96817

May 9, 2025

**Via Electronic Mail & In-Person**

Board of Land and Natural Resources  
1551 Punchbowl Street  
Kalanimoku Building  
Honolulu, HI  
[blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

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, Tax Map Keys (TMKs) (3): 4-4-015:008; 44-016:005; and 7-1-004:007 (Agenda Item D-1).

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

The Office of Hawaiian Affairs (OHA) respectfully requests that you reject the Final Environmental Impact Statement, Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai'i, dated April 2025 (the FEIS), for failure to comply with the Hawai'i Environmental Policy Act (HEPA), Hawai'i Revised Statutes (HRS) chapter 343. As the Board is aware, Pōhakuloa is an area of cultural and historical significance for Native Hawaiians, and comprises part of the ceded lands base in which both OHA and the State hold an interest as trustees acting on behalf of Native Hawaiians and Native Hawaiians and the general public, respectively. *See, e.g., Ching v. Case*, 145 Haw. 148, 176-77, 449 P.3d 1146, 1174-75 (2019) (describing origins State's trust duties with respect to the ceded lands and all public natural resources more generally).

In addition to other reasons set forth in the staff submittal detailing shortcomings in the FEIS, OHA urges the Board to reject the FEIS for the following reasons:

1. The FEIS does not fully examine the effect of the U.S. Army (Army) seeking a fee interest in training lands at Pōhakuloa rather than extending their existing leasehold interest, which would effectuate alienation of a portion of the ceded lands base;
2. The FEIS does not disclose or examine the Army's compliance with clean up requirements on the lands it proposes to retain *or* the lands it proposes to return to the State at the end of the current lease term, erroneously insisting that clean-up should be addressed only after lease expiration; and
3. The FEIS does not fully disclose or examine the effects of ongoing military training activities on 'iwi kūpuna and other cultural resources located at Pōhakuloa.

HEPA is an early opportunity to ensure that ongoing discussions concerning the expiration of Department of Defense military leases, and any potential renegotiation of lease terms, comply with governing law and the rights of Native Hawaiians and the larger public. OHA urges the Board to hold the federal government to its duties under HEPA and to court orders specific to Pōhakuloa’s prudent stewardship to the full extent feasible in the current political environment. OHA also notes and echoes the many concerns related to the inadequate analysis of the effects of ongoing training activities on cultural and natural resources as raised in comment letters submitted by The Center for Biological Diversity, the Sierra Club and others and urges the Board to give full weight to these considerations in making its determination whether to accept or reject the FEIS. *See, e.g.*, Vol. III at pdf pp. 777-92, 1262-77.

I. The FEIS Does Not Fully Disclose or Examine the Army’s Preferred Method of Land Retention

Established pursuant to the terms of Section 5 of the Admissions Act, the Hawai‘i State Constitution, Article XII, sections 4, 5, and 6, and HRS chapters 10 and 10H, OHA serves as a semiautonomous agency and trust vehicle for the betterment of the conditions Native Hawaiians. OHA’s nine elected trustees exercise their powers “to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiians, including all income and proceeds from that pro rata portion of the [ceded lands] trust.” Haw. Const. Art. XII, § 6. OHA’s duties include “serving as a “receptacle for reparations,” and implementing “the recognition of the Native Hawaiian people by means and methods that will facilitate their self-governance.” HRS §§ 10-3(6), 10H-2. Therefore, OHA has a paramount interest in preserving the corpus of the former crown and government lands of the Hawaiian kingdom (ceded lands)<sup>1</sup> until a resolution of Native Hawaiians’ unrelinquished claims to these lands, including sovereignty and governance over a land base, is resolved.

The Hawai‘i Supreme Court has recognized the State’s obligation to preserve the public land trust, including ceded lands, and acknowledged that land is “the foundation (or starting point) for reconciliation” between the State and Native Hawaiians. *Office of Hawaiian Affairs. v. Hous. & Cmty. Dev. Corp.*, 177 P.3d 884, 902 (Haw. 2008), *rev’d and remanded sub nom. Hawaii v. Office of Hawaiian Affairs.*, 556 U.S. 163 (2009) (reversed on other grounds).

[T]he Apology Resolution and . . . related state legislation clearly contemplate that native Hawaiians (1) “never directly relinquished their claims to . . . their national lands to the United States,” and (2) “are determined to preserve, develop and transmit to future generations their ancestral territory.” As such, we believe and, therefore, hold that the Apology Resolution and related state legislation . . . give rise to the State’s fiduciary duty to preserve the corpus of the public lands trust, specifically, the ceded lands, until such

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<sup>1</sup> OHA recognized that referring to the Kingdom of Hawai‘i crown and government lands as “ceded lands” is problematic given that they were not ceded lawfully by the Native Hawaiian government but rather through the illegally constituted Provisional Government. However, for ease of reference, we use this term.

time as the unrelinquished claims of the native Hawaiians have been resolved. Such duty is consistent with the State's "obligation to use reasonable skill and care" in managing the public lands trust and the Ahuna court's declaration that the State's conduct "should ... be judged by the most exacting fiduciary standards."

*Id.* at 905 (internal citations omitted).

In 2013, the Hawai'i legislature by concurrent resolution recognizing the anniversary of the apology resolution: "reaffirm[ed] the State's commitment to reconciliation with the Native Hawaiian people for historical injustices, urg[ed] the federal government to advance reconciliation efforts with Native Hawaiians, [and] support[ed] efforts to further the self-determination and sovereignty of Native Hawaiians." S. Con. Res. 2 (2013).

The analysis presented in the draft EIS and final EIS related to the method and term of retention is inadequate and fails to recognize the Native Hawaiian people's unrelinquished governance claims to the ceded lands corpus. OHA's 2022 comments requested that the Army include a shorter lease term as an alternative. *See* FEIS Vol. III at pdf p. 526. The Army's response to this comment notes that a 10-year lease fails to comply with Army requirements, but fails to explain why any other shorter lease term (greater than 10 years but less than 65 years) would also be inadequate. *See id.*, Vol I at 2-23. This response is non-responsive and side-steps the question of the Army's preferred method and term of land retention. OHA repeats its call for the Army to consider a shorter term of retention and disclose what different effects a shorter term, such as 25 years, might have.

Moreover, HEPA requires that the Army "include in a separate and distinct section a description of all irreversible and irretrievable commitments of resources that would be involved in the proposed action should it be implemented." Hawai'i Administrative Rules (HAR) 11-200.1-24. Fee alienation of the ceded lands base would present such an "irreversible and irretrievable" commitment of resources, but is not independently disclosed or analyzed as a separate alternative. Rather, the Army wrongly asserts that "only difference between retention via fee simple title and retention via a new lease or easement is that under a new lease or easement the Army would adhere to lease/easement conditions, assumed Army obligations due to State requirements in the COMP, and applicable State processes/administrative requirements." FEIS, Vol 1. at 2-26.<sup>2</sup> As made clear by numerous comments, the assumption that a lease and fee interest are identical except for beneficial land management measures is false. *See, e.g.*, FEIS, Vol. III. at pdf pp. 1216-17, 1296, 1488.<sup>3</sup> However, the FEIS was not revised in any way to meaningfully respond to or address these concerns.

Given the long-term consequences of land alienation particularly with respect to Native

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<sup>2</sup> The FEIS does acknowledge a fee simple title method of land retention under Alternatives 1, 2, and 3 in Section 5.4, and states that this would be a "new... significant adverse impact." However, this contradictory language is unresolved and as explained below these significant adverse impacts demand a separate alternatives analysis, commensurate with the harm this method of land retention would inflict.

<sup>3</sup> Pdf page numbers are used for the appendixes (Vols. II, III) which are not clearly paginated and numbered.

Hawaiian governance rights, the Army must disclose and analyze as a separate alternative the effects of retaining state-owned land at Pōhakuloa through fee simple ownership rather than lease extension. A separate, stand-alone alternative offering that kind of transparent analysis would properly alert the public and elicit their comments on the negative effects of this method of land retention, more completely fulfilling the underlying purposes of HEPA. While OHA is opposed to alienation of the ceded lands base whether through long-term lease or fee simple acquisition, OHA notes that fee simple acquisition, if pursued, must involve more than simply a “fair market value” evaluation. *See, e.g.*, FEIS Vol. I at 3-22, 3-25, 3-222. Rather, an alternative focused on fee simple acquisition would need to consider mitigating measures appropriate to the level of harm including, but not limited to, for example, a long-term community benefits package for Native Hawaiians including a commitment to assist with governance initiatives. The Army would also need to respond to community comments on this alternative, once properly and transparently raised, *see* HAR 11-200.1-26, which thus far has not occurred.

## II. The FEIS Does Not Disclose the Status of the Army’s Compliance With Existing Lease Terms Related to Clean-Up

As a trustee of the ceded lands base, and of the Native Hawaiian people’s unrelinquished claims to self-governance, OHA is concerned with the failure of the FEIS to clearly set out the Army’s compliance with clean up measures included in the current lease and required to safeguard the land’s long-term use and accessibility for civilians. The FEIS states that “[u]ntil lease expiration, or designation of certain areas of the State owned land as ‘closed ranges,’ MEC on State-owned land will continue to be managed under USAG-HI’s and USAG-PTA’s SOPs,” FEIS Vol. I at 3-101, and that “[b]ecause the State-owned land is still an operational range, a full assessment of MEC that may be present has not been conducted.” *Id.* at 3-112. In other words, for state lands that it retains, the FEIS indicates that the Army will not fully investigate the land for MECs (munitions and explosives of concern), or fully clean and clear ranges that are still in operation. Even for those lands that it intends to return to the State, the Army pushes any disclosure or analysis of cleanup costs and concerns further down the road, to be governed by the separate CERCLA<sup>4</sup> process. *See, e.g.*, FEIS Vol. I at 2-3, 2-11, 2-15, 2-21.

In comments, numerous members of the community, including OHA, raised their concerns with the status of clean-up efforts following the Hawai‘i Supreme Court’s ruling in the *Ching v. Case* lawsuit which recognized that the Department of Land and Natural Resources (DLNR) had been derelict in enforcing clean up provisions of the existing lease agreement. *See, e.g.*, FEIS Vol. III at pdf pp. 94, 104, 115, 121-135, 1232. While the FEIS was revised to include the annual reports for inspections DLNR performed pursuant to the *Ching* ruling, these reports alone are insufficient to respond to community concerns. The reports are piecemeal snapshots of limited portions of the range and reflect the Court’s understanding of its limited power to order injunctive relief rather than the full range of information necessary for informed decision making under HEPA. Therefore, this response does not fully respond to the substance of community comments.

To ensure that State lands leased to the Army are preserved for future civilian use, OHA

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<sup>4</sup> Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. ch. 103.

urges the Board to reject the FEIS and demand more information from the Army consistent with community comments including such basic information as:

- What are the estimated costs and timeline of cleaning and fully restoring the ~3,000 acres that the Army proposes to return to the State of Hawai‘i?
- How does failure to fully clear the land after the initial 65-year term expires make long-term restoration of retained lands more difficult?
- How do the Army’s SOPs ensure compliance with Paragraph 14 of the lease which states:

In recognition of the limited amount of land available for public use, of the importance of forest reserve and watersheds in Hawaii, and of the necessity for preventing or controlling erosion, the Government hereby agrees that, commensurate with training activities, it will take reasonable action during its use of the premises . . . to prevent unnecessary damage to or destruction of vegetation, wildlife and forest cover, geological features and related natural resources and improvement . . . help preserve the natural beauty of the premises, avoid pollution or contamination of all ground and surface waters and remove . . . all trash, garbage and other waste materials resulting from Government use of the said premises.

Despite its pages of analysis related to the alternatives, the consequences of delaying full clean up and restoration activities for another 65-year term are not fully disclosed nor analyzed in the FEIS. Moreover, the Army does not disclose any information related to clean up and restoration of lands it intends to return to the State.

While it may be within the Army’s rights under CERCLA to delay analysis, it is not compliant with HEPA or the State’s interest in fully understanding the consequences of extending the lease to enable continued military activities at Pōhakuloa. Destruction and contamination of the ‘āina itself through military use is one of the primary foreseeable environmental consequences of lease extension that must be analyzed under HEPA. *See* HAR 11-200.1-27 (a FEIS “shall fully declare the environmental implications of the proposed action and shall discuss all reasonably foreseeable consequences of the action.”). Whether long-term cleanup and restoration are practicable and feasible, and whether those efforts become less practicable and feasible with continued, unmitigated use, are crucial to evaluating lease renewal options. Without this analysis, the FEIS is deficient and must be rejected.

### III. The FEIS Cannot Be Completed Separately from the HRS Chapter 6E Historic Review Process

OHA supports calls from the State Historic Preservation Division (SHPD) for an archaeological inventory survey (AIS) that covers the entirety of state-owned lands at Pōhakuloa. Without a proper accounting of historic properties, the Army is unable to adequately provide mitigations and alternatives in the FEIS for any adverse impacts that may be occurring. Mitigation could include measure such as preservation of sites that are important to Native Hawaiians, data recovery for sites that are vulnerable to damage, and other operational



adjustments.

In OHA's May 2022 comment letter on the first DEIS, we stressed the importance of conducting the HRS 6E process concurrently with the HRS 343 process to facilitate public review and comment on the historic and cultural effects of proposed lease extension:

While OHA does recognize that the HRS 6E and 343 processes are separate, we have been supportive of the HRS 6E process being completed or at least initiated first to assist in properly informing the environmental review process. The intent of HRS Chapter 343 is to ensure a project's impact to the environment is fully considered in the planning process and to integrate mitigation where needed to minimize significant environmental harm. Surveys are conducted to identify various environmental components (i.e., flora, fauna, historic properties) so that any adverse impacts from the proposed action can be evaluated. In determining whether historic properties will be adversely impacted, the HRS 6E review process is essential to identifying historic sites and generating mitigation commitments in consultation with the SHPD. Any identified sites and resulting mitigations made during the HRS 6E review process are typically included in the environmental review for an adverse impact analysis and public comment.

FEIS Vol. II at pdf p. 221. However, the Army did not adjust course to integrate chapter 6E review into the HEPA process, or respond substantively to these comments, insisting instead that lease renewal is an "administrative action." *See id.*

As indicated in the staff submittal, SHPD has raised similar concerns in consultation meetings with the Army, and states that they are currently unable to adequately assess the potential environmental impacts to cultural resources within the proposed retention areas. OHA agrees with SHPD that there is insufficient information to allow for an adequate assessment of adverse impacts to historic properties and cultural resources, which is a sufficient basis to reject the FEIS for failure to comply with HEPA, regardless of how the Army chooses to characterize the proposed action. *See HAR §§ 11-200.1-24, -27* (directing that a draft and final environmental impact statement shall both address and consider mitigation measures for impacts to cultural resources).

The BLNR submittal also notes that as far back 1997, the Army has been removing cultural objects found on State-owned lands and storing them in a curation facility, in contravention of Native Hawaiian custom and potentially state law. OHA has observed that the Army exclusively uses the federal Native American Graves Protection and Repatriation Act to resolve disposition of cultural objects, but now questions this process as SHPD appears to be asserting the State's interest in these cultural objects. The BLNR submittals cites HRS 6E-7, saying that "all historic property locates on lands or under waters owned or controlled by the State shall be the property of the State... The control and management of the historic property shall be vested in the department." Indeed, this information should be disclosed to the Board as an "unresolved issue" in the FEIS, and the Army and the State should be undertaking to resolve this matter, in consultation with OHA and other cultural stakeholders.

Mahalo for this opportunity to provide testimony highlighting some of the legal

deficiencies that compel that this Board reject the FEIS and continue to work with the Army to gather and disclose the necessary information to make a pono and informed decision.

‘O wau iho nō me ka ‘oia ‘i‘o,

A handwritten signature in cursive script, appearing to read "Stacy Ferreira".

Stacy Ferreira

Ka Pouhana, Chief Executive Officer

**From:** [Danny Li](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] PTA lease --no renewal  
**Date:** Thursday, May 8, 2025 9:02:07 AM

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I join thousands in opposing the renewal of State lease for Pohakuloa. No to toxic desecration to the a'ina.!!

Peace and Aloha,  
Danny H.C. Li( Kea'au, Hawai'i)

**From:** [connor.logsdon](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Subject line We demand BLNR to reject the US army's Pōhakuloa FEIS  
**Date:** Thursday, May 8, 2025 8:48:03 AM

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Aloha,

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

Sincerely,  
Connor Logsdon  
Ka'ū, Hawaiiinui  
Sent from my iPhone

**From:** [James Long](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Must Protect Pohakuloa  
**Date:** Thursday, May 8, 2025 9:00:17 AM

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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.

Mahalo,  
James Long  
Naalehu, Hawaii Island



May 7, 2025

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

Aloha e Chair Chang and Members of the Board,

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

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

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

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

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

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



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

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

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

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

**From:** [Gretchen Losano](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa Military lease  
**Date:** Thursday, May 8, 2025 11:53:23 AM

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Aloha Board of Land and Natural Resources Representatives,

Please reject the army's EIS for Pōhakuloa. The US military has proven time and time again to be unfit stewards of any 'āina in Hawai'i and have never placed the health and well-being of Hawaiians, and Hawai'i's citizens at the forefront of any decision making whatsoever. Additionally, with the intellectually and morally corrupt foreign policy of the current administration, there would be no end in sight for war game training for the army and it is time to let Pōhakuloa rest and begin to heal. Not including recent significant archeological finds in their EIS should be more than enough technical reason to reject the EIS and end the military lease in 2029.

Morally, you already know the proper response, as you all have been chosen to protect the natural resources of Hawai'i, which the army is clearly destroying with the very nature and practice of this lease. Please start righting the wrongs of the past with the rejection of the US Army's EIS for Pōhakuloa.

Mahalo,  
Gretchen

Gretchen Losano  
Co-Founder  
**West Maui Green Cycle**  
(808)428-9931

*“He ali'i ka 'āina, he kauwā ke kanaka // The land is chief, man is it's servant”  
-‘ōlelo no’eau #531*



**From:** [Mia Lum \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa  
**Date:** Thursday, May 8, 2025 9:00:09 AM

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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,  
[Mia Lum]  
[Oahu]

**From:** [Ayahna Mack](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Public Testimony on EIS for retention of State-owned land at Pōhakuloa Training Area (PTA)  
**Date:** Thursday, May 8, 2025 9:15:39 AM

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Aloha BLNR board members,

I am writing to oppose the Final Environmental Impact Statement (EIS) as it is incomplete in addressing concerns regarding the Army's proposed action for the retention of State-owned land at Pōhakuloa Training Area (PTA), as outlined in the proposed alternatives and considering the environmental, health, and public safety implications, it is clear that the plan as presented fails to adequately address key legal and environmental obligations as well as failed to address comments from state agency's and community during the drafting. The following points outline these concerns:

1. Failure to Address Potential Environmental Contamination and Lack of Cleanup Plans

The EIS fails to adequately address the long-term environmental risks associated with hazardous materials, such as unexploded ordnance (UXO), lead, and other pollutants such as uranium, resulting from years of live-fire training at PTA. These hazardous substances present a significant risk to the local community, especially in terms of water and soil contamination. Under both state and federal law, the Army is obligated to take proactive measures to remediate such hazards and protect public health and the environment. The absence of a comprehensive and enforceable cleanup plan, as well as failure to include an actionable timeline for mitigation, undermines these obligations. The following measures are required: Comprehensive environmental testing for hazardous substances in water and soil in and around PTA. A clear, phased cleanup plan that includes both short-term and long-term strategies for addressing contamination. Regular environmental monitoring publicly shared to assess the impact of military training activities.

2. Inadequate Assessment of Community Health Risks

While the EIS acknowledges noise pollution, it fails to provide an adequate evaluation of the broader health risks to local communities, including exposure to lead and other toxic chemicals from live-fire exercises. The EIS also does not account for the cumulative effects of such contamination on public health, such as respiratory illnesses, neurological conditions, and cancers, all of which have been linked to military training activities and toxic materials. The Army is legally required to assess and mitigate the potential public health risks associated with its actions. The EIS should provide a more comprehensive analysis of how military activities could affect vulnerable populations, including Indigenous groups and residents living near PTA, and propose mitigation measures to reduce those risks.

3. Insufficient Exploration of Simulated Training Alternatives

The Army has access to advanced training technologies, including high-fidelity simulation systems, that could replace live ammunition exercises. Despite this, the EIS does not explore or mention the potential benefits of using virtual reality or augmented reality technologies to conduct realistic training exercises. Such systems could replicate real-world conditions with minimal environmental impact and no risks associated with live ammunition. In accordance with environmental protection laws, such as the National Environmental Policy Act (NEPA) and the Hawaii Environmental Protection Act (HEPA), the Army is required to explore alternatives to its proposed action that would reduce environmental harm and potential public health risks. Given the advancements in technology, it is imperative that the Army reassess its reliance on live-fire exercises and fully explore simulated training alternatives some of which are already in practice around the state.

4. Inadequate Consideration of Public Feedback

The public participation process is an essential part of both the NEPA and HEPA frameworks.

It is evident that public comments raised concerns about environmental protection, health safety, and the preservation of cultural practices, yet these concerns are not adequately addressed in the proposed alternatives or efforts to mitigate harm. The Army must demonstrate that public feedback has been meaningfully incorporated into the final decision-making process. Failure to adequately address the concerns of local residents, Indigenous groups, and other stakeholders would constitute a failure to comply with legal requirements for public participation and informed decision-making.

Therefore, I request for additional review and public consultation. Given the significant concerns related to environmental contamination, public health risks, and the lack of meaningful exploration of alternatives, I request that the Army conduct additional environmental review and engage in further public consultation. This process should include: A more thorough evaluation of the long-term environmental and health impacts on local communities. An exploration of alternative training methodologies. A plan for removal and remediation of training debris. Actual action in addressing the illegal sale of DHHC lands as expressed in DHHL's comments. I urge the Army to reconsider its proposed action, fully address public concerns, and develop a more comprehensive plan that protects the environment, public health, and cultural practices.

Please consider these concerns, Ayahna Mack

**From:** [Yvonne Mahelona](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda item D-1  
**Date:** Thursday, May 8, 2025 8:59:56 AM

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

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

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

Please reject this FEIS, to ensure that the Army is held accountable for what it has and will continue to inflict with its "retention" proposal, including to the Native Hawaiian community.

Me ke aloha 'Āina,  
Yvonne Mahelona

**From:** [hopoe makekau](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa Testimony  
**Date:** Thursday, May 8, 2025 9:03:56 AM

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Aloha,

My name is Hōpoelehua Pa‘a Makekau and I am Kanaka ‘Ōiwi from Honokohau Iki, Kailua Kona on the island of Hawai‘i. I am submitting testimony urging the Board of Land and Natural Resources to reject the FEIS presented by the U.S. Army for the following reasons:

1. The FEIS does not meet environmental, legal, or ethical standards expected of the settler occupying governing State of Hawai‘i.
2. The Army’s failure to consult ‘Aha Moku or conduct meaningful analysis of cultural impacts is reason enough to reject the FEIS.
3. The Army’s FEIS failed to respond adequately to serious public concerns raised during the draft EIS process.
4. Their responses are not commensurate with the scale of cultural, environmental, and legal impacts raised.
5. The FEIS disregards clear Hawai‘i law, as pointed out by DLNR staff.
6. The Army is not above the law, yet refuses to complete cultural and environmental impact assessments on federal lands which undermines the state’s legal authority and process.
7. The FEIS leaves critical questions unanswered about endangered species, iwi kūpuna, and sacred sites.
8. The FEIS blatantly ignores the unique relationship between Native Hawaiians and the sacred lands of Pōhakuloa. The Military and occupying settler government continues to ignore and disrespect our relationship and our responsibilities to Pōhakuloa.
9. 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.
10. Accepting the deficient FEIS would set a harmful and dangerous precedent.
11. Future applicants may use this as an excuse to bypass proper environmental and cultural review.
12. The Army’s failure to consult ‘Aha Moku is not only unacceptable, it is dishonorable.
13. Harm to Native Hawaiians is ongoing and ignored.

The BLNR has a constitutional duty and mandate to protect cultural and natural resources for future generations. Without proper biological and cultural surveys, the Board cannot fulfill its public trust responsibilities. Variations of this Board have historically voted against the concerns of the people and against the wellbeing of our natural resources.

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.

The people of Hawai‘i will hold you accountable for your decisions.

Kū Kia‘i Pōhakuloa,

na Hōpoelehua Pa‘a Makekau

Lā 8 o Mei 2025  
Pōhakuloa, Hawai‘i

Sent from my iPhone

**From:** [Nana Manuel](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:58:04 AM

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Aloha e Chair Chang and BLNR members,

I am Nana-Honua Manuel from Volcano, Puna, Hawaii. I respectfully urge you to honor your oath, mission and fiduciary kuleana to malama 'aina by rejecting the Army's FEIS for Retention of Pohakuloa.

I am grateful for the scoping meetings that have been held on Moku o Keawe over the past 5 years. However, this meeting should have been held on this island as we are the most impacted.

I have lived in Volcano since 1974 and over the years we have heard and felt and seen the bombing of Pohakuloa from various places in our community. The impacts of the sounds & vibrations & flashes over Mauna Loa cause physical trauma to us even if the sounds are faint & distant.

The awareness of undocumented artifacts, iwi, moepu being destroyed along with the 'aina also causes anguish. Please protect these Public Trust Lands and reject this FEIS.

Mahalo,

Nana-Honua Manuel

We



To Whom It May Concern,

As a retired U.S. Army veteran and a resident of Hawai'i Island since 2013, I am writing in strong support of the U.S. Army's Final Environmental Impact Statement (EIS) and the retention of lands at Pōhakuloa Training Area (PTA).

During my 20 years of service, I witnessed firsthand how essential realistic, terrain-relevant training is to ensuring the readiness and safety of our military personnel. PTA provides unique and irreplaceable conditions for training that cannot be replicated elsewhere in Hawai'i. It plays a critical role not only in preparing our forces for the challenges they face globally but also in maintaining our strategic readiness in the Pacific theater—an increasingly vital region for national security.

Since settling on the Big Island after my military retirement, I have also come to deeply appreciate the cultural, environmental, and community values that define this place. I understand the concerns raised by some regarding the Army's footprint on Hawaiian lands. However, I believe it is possible—and necessary—for military training and environmental and cultural stewardship to coexist. The Army has made progress in habitat protection, endangered species conservation, and cultural site management at PTA, and I encourage continued partnership and transparency with the local community to ensure these efforts remain strong and evolve.

Retaining access to PTA for training ensures our service members can train safely, effectively, and responsibly, while also supporting the local economy and sustaining emergency response capabilities across the island.

I respectfully urge decision-makers to support the continued retention of training lands at PTA under the preferred alternative outlined in the Final EIS. As a private citizen, veteran, and member of this community, I stand in support of balancing national defense needs with the stewardship of Hawai'i's unique lands.

Thank you for the opportunity to comment and for your continued engagement with the community.

Respectfully,

  
Joel J. Marcrum

USA Retired and Hawaii County Resident

**From:** [Isa Maria](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Pohakuloa  
**Date:** Thursday, May 8, 2025 8:39:40 AM

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Aloha,

This testimony is to urge you to REJECT the army's EIS.

1. Because the army admits widespread contamination but refuses to clean it up.
2. Because the army deletes and doesn't share data on spills into the water and ecosystems.
3. Fires, climate harms, and endangered species are dismissed without evidence.
4. The EIS evades Hawaii law by ignoring cumulative impacts.

Sincerely,  
Isa Maria

6538 Kahuna Rd  
Kapaa HI 96746  
808.652.6139  
[isamagic@gmail.com](mailto:isamagic@gmail.com)

**From:** [Taylor Marsh](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject Army Lease at PTA!!!!!!  
**Date:** Thursday, May 8, 2025 9:40:52 AM

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Aloha!

With respect, I am a local on Oahu and Hawaii Island, and I have an organization Native Ecosystem Services where we protect native ecosystems and restore after wildfires. The Army training at Pohakuloa has been a long lasting detriment to the vulnerable land on this island. Military “readiness and defense” cannot trump the environment.

You must reject the lease.

May 7, 2025

To The BLNR and US Army,

My name is Mahealani Martin and I am a sovereign Kanaka Maoli from the Hawaiian Kingdom. I know this by way of my genealogy from the very beginning. I also know that my birth certificate ties me into the United States Corporation which is a false document. I am not an American but, forced to believe in this lie by way of indoctrination of the American educational system are considered war crimes.

For, one hundred and thirty two years of an illegal occupation without a Treaty of Annexation that you cannot prove one exists, your presence in Hawaii are war crimes committed against the Kanaka also known as the Heirs is a form of genocide.

Today, I would like to address the Pohakuloa Army lease. Your time spent on Hawaii island is not going to be extended for the amount of desecration you have done over the years. And, without a Treaty of Annexation all of you under Kingdom law will get the penalty of death.

There will be absolutely no excuses for the wrong committed especially, desecrating the sacred aina that you are responsible for destroying. Not only have you contaminated the aina but, you have contaminated the groundwater and the air. We could care less about your EIS for we know that it contains nothing but lies so, you are certain of retaining another lease to stay and to do more harm. We do not want you there where you have littered the aina with your bombs and that you have no intentions of clearing away those ordinances should be included in your EIS. The Army should also include the disbursement of depleted uranium in the air, ground, and water is a deadly threat to the environment and human life.

The State of Hawaii Corporation, Department of Land and Natural Resources and the board members this is addressed to you. Since, you are assuming the role within the de facto State of Hawaii Corporation it does not mean you have the authority to allow the Army to stay on the sacred aina of Pohakuloa. The Army's EIS should contain the harmful effects of their actions which could result in destruction of the environment and life.

You are an insurgency since the time of Stanford B. Dole and the provisional government to the Republic of Hawaii and the Territory of Hawaii. Let me remind you that without a Treaty of Annexation all of you are committing war crimes is the penalty of death under Kingdom law.

In 1843, the Hawaiian Kingdom became independent and it has solidified 145 Treaties with other nations including the United States which they were the only ones to break the laws between them and the Kingdom. During that time the Hawaiian Kingdom government went from an Absolute Monarchy to a Constitutional Monarchy and the first Kingdom Constitution of 1850 that contained the laws of the land.

In 1848, King Kamehameha III spearheaded the Great Mahele and set out to divide the lands in three ways Kingdom Government, Crown Lands, and the native tenants. Within that time, he enacted laws into the Kingdom Constitution which prohibited foreigners to enter the Kingdom to purchase land and making it a priority to privatize all the lands under the three divisions within Hawaii nei.

As an Heir to the lands and through my birthright, I am against any more desecration in which you have done while illegally occupying Hawaii. Hawaii is not yours to take and play your stupid war games. You have created a harmful environment for the people of Hawaii island.

What you have done here for one hundred and thirty two years is incomprehensible and negligent and by being irresponsible your actions are warranted under Kingdom law is the penalty of death.

To come to Hawaii to make money by selling off our lands and resources to allowing an influx of tourists into the islands and selling the Kanaka to human traffickers which, I have been trafficked by people who are public figures are all forms of genocide.

As, we Kanaka are the Heirs in the Kingdom and have endured great harm under the leadership of the United States Corporation and the insurgency State of Hawaii Corporation without a Treaty of Annexation that all of you from past to present leaders will be put to death. Everyone of you have committed genocide since 1893 against our Queen Liliu'okalani and it has been

ongoing to the present day. Whatever you have done here are all forms of genocide. And, without a Treaty of Annexation, US laws were nevertheless legal even if you had properly annexed Hawaii.

Everything today in Hawaii are lies and by creating a false narrative that the United States and it's military has every right to be here is by far the truth. While you are backing the insurgency State of Hawaii and falsely claiming to be the 50th state, the Kanaka Heirs have every right to defend themselves against the enemy where enough is enough.

Hawaii are the lands of aloha and it runs in the veins of every Kanaka Maoli however, all the hewa that has been happening here from the United States Military Corporation and the State of Hawaii Corporation have not shown the people aloha instead, they have shown us the opposite so, I don't think it will be necessary to show any of you aloha.

With that, I stand firm in my decision to say a'ole to extending the Army's lease on Pohakuloa. Clean up your opala and be ready to be tried for the war crimes committed on the sacred aina of Pohakuloa and against the Kanaka Maoli because no one will be allowed to leave.

A Sovereign Heir in the Hawaiian Kingdom,

Mahealani Martin

**From:** [Moana Masaniai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D-1 Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 11:45:16 AM

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Aloha e to the Chair and Members of the Board and Land and Natural Resources (BLNR),

I am Moana, Executive Director of Hawaii Peace and Justice. Mahalo for the opportunity to testify.

We submit this testimony to address the ongoing military desecration of the Pōhakuloa Training Area (PTA) and the profound harm it continues to cause to the land, Native Hawaiian communities, and the environment. **We urge you to REJECT the Army's FEIS.**

As you know, Pōhakuloa is sacred land, connected to Kanaka Maoli cultural practices such as hunting, gathering, and religious ceremonies. There are birthing stones and 'iwi kupuna found there, yet the military is still allowed to occupy this sacred space? This is not only unjust, but it also **perpetuates the violation of Native Hawaiian cultural practices and traditions.**

The Army **has not conducted an adequate assessment of contamination at PTA.** They've failed to test all the soil or sample groundwater and shallower aquifers to fully understand the spread of toxic materials. This blatant disregard for thorough investigation is unacceptable. If the Army refuses to uncover the truth and fully address the contamination, they have no right to control this land. The way they treat the importance of this report reflects how they treat the land and its people.

Since live-fire training began in 1943, over 2,000 fires have occurred at PTA, with more than 1,000 directly caused by the Army's activities—**roughly 1-2 fires a month!** This is an undeniable risk to both the land and surrounding communities. This alone should be reason enough to reject the Army's FEIS.

Furthermore, **the current process is deeply flawed by allowing the military to "report" on their own destruction.** This is a biased approach. How can we trust the party responsible for the damage to assess it fairly? There must be an independent third-party organization tasked with ensuring transparency and accountability.

The Army's failure to properly address environmental damage and harm to our cultural heritage is an injustice that must end. DLNR must hold the Army to a higher standard of accountability. Additionally, DLNR should explore fairer, more transparent methods for handling the lease renewal process. The current process is harmful, confusing, and causes distrust with the State due to its clear bias. We urge the Board of Land and Natural Resources to **REJECT the Army's Final Environmental Impact Statement for Pōhakuloa.**

Mahalo again for the opportunity to testify for Pōhakuloa.

Moana Masaniai  
Executive Director, Hawaii Peace and Justice

**From:** [Aubrey Ke'alohipi Matsuura](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] PROTECT PŌHAKULOA: Reject the U.S. Army's Final EIS  
**Date:** Thursday, May 8, 2025 8:38:10 AM

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Aloha 'āina kākou!

I am Aubrey Matsuura from Hāli'imaile, Maui and I am writing to the Board of Land and Natural Resources to present my opposition and complete rejection to the U.S. Army's ask for a final Environmental Impact Statement. It is clear that military presence here in Hawai'i has only caused harm and destruction to our 'āina, wai, and also our people. Specifically, the presence of the U.S. Army at Pōhakuloa and their use of that space as a training site and further for bombing practice, is desecration. The decades of damage and destruction is irresponsible and ignorant to the sacredness of our 'āina and wai, the reciprocal relationship that we (Hawaiians) have with 'āina and wai, and the overall understanding of the importance and fragility of our place/resources. I urge the BLNR to:

1. Reject the U.S. Army's Final Environmental Impact Statement for the proposed retention of 23,000 acres at Pōhakuloa Training Area
2. Ensure that future decision making on any EIS and any matter pertaining to Pōhakuloa is held on Hawai'i Island and further includes communities directly impacted and those who are intimately connected to that place.
3. Be transparent in discussions and negotiations.

Be responsible to the 'āina, wai, and people that you are appointed to represent.

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Aubrey Ke'alahilani Matsuura  
Instructor, E Ho'oulu Lāhui, UHMC



**From:** [Taylor Mauldin](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] T. Mauldin Testimony  
**Date:** Thursday, May 8, 2025 9:37:05 AM

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Dear 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. A loved one of mine is kanaka, from Maui, and their family has been deeply affected by the U.S. military's presence in Hawai'i for generations. This loved one has instilled within me a deep respect for the cultural significance & legacy of Hawai'ian traditions and land stewardship—which the presence of the U.S. Military directly conflicts with. Because of my understanding of the the connections between the military industrial complex, settler colonialism, and the degradation of native quality of life I am compelled to give this testimony.

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,

Taylor Ann Mauldin

Key West, Florida  
From my Island to Yours

T. Mauldin  
interdisciplinary artist

**J. Kukui Maunakea-Forth**

84-868 Moua Street

Wai'anae, Hawai'i 96792

808-864-9485

kukui@maoorganicfarms.org

Aloha Department of Land & Natural Resources, Land Board Members,

As a family of organic farmers living in Wai'anae, we know firsthand the vital importance of 'āina to our survival—not just physically, but culturally and spiritually. 'Āina is our foundation, our source of life and identity. It feeds us, teaches us, and connects us to our kūpuna and keiki alike. Yet, in our own community, we see how the irresponsible use of lands at Lualualei, Schofield, and Mākua continues to harm the integrity of our 'āina and the well-being of our people.

**That is why I strongly oppose the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area and urge the Board to reject the Army's Environmental Impact Statement (EIS).**

Pōhakuloa is more than just a training site—it is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. It is a living landscape that deserves respect, protection, and regeneration—not desecration.

The Army has already caused irreparable harm through years of neglect and misuse, including the burning of nearly 20,000 acres of land and critical habitat. The continued use of live fire and bombing not only contaminates our lands and waters but dishonors the cultural and spiritual relationship Native Hawaiians have with these places.

We practice organic, pono agriculture because we know that when we harm the land, we harm ourselves. To bomb, poison, and degrade the very 'āina that feeds us—physically, spiritually, and culturally—is a violation of our deepest values and responsibilities.

The Army's EIS is fundamentally flawed and must be rejected for the following reasons:

- It fails to adequately assess or mitigate impacts to cultural and natural resources
- It ignores serious concerns about depleted uranium contamination
- Military activity is incompatible with the conservation district designation of these lands
- Its approval would be in direct conflict with the BLNR's constitutional duty to mālama 'āina

We urge the Land Board to stand in aloha 'āina and protect Hawai'i's future by rejecting the Army's FEIS for Pōhakuloa. The time has come to return these lands to a path of healing and restoration—for the sake of our 'āina, our culture, and the generations to come.

Please feel free to contact me with any questions or concerns. I would like to remain updated on future hearings as well.

Me ka 'oia'i'o,

*J. Kukui Maunakea-Forth*  
J. Kukui Maunakea-Forth

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**From:** [Malia McGivern](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject!  
**Date:** Thursday, May 8, 2025 9:00:37 AM

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Please to anyone who reads this, please reject the U.S Army's Final Environmental Impact Statement (FEIS) tomorrow morning. As a native hawaiian, we have even less than we did during the 1930 through the 40s. Hawai'i's representatives in the United States government has never stood up for our people, our land, rejecting the spiritual impact of the land being alive like a person without a voice. We are slipping for our hawaiian spiritual values in the federal/governmental level. We have always catered to the american economical needs for too long, we come from people who were 100% sustainable. We need to stand up and show America a more deeper and loving way to live. Not let them come in to our lands and destroy it as target practice like they did to Kaho'olawe. How dare they even think to touch our land in such a manner again. You need to stand up for us and our land. This is coming for someone who got priced out to the mainland. My time at home may be over but while you still wake in her arms keep her safe. Please fight back and reject this bill.

**From:** [Dillon McLaughlin](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1  
**Date:** Thursday, May 8, 2025 9:01:09 AM

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Aloha,

I reject the Army's environmental impact statement (EIS) due to its insufficiencies on several grounds, including:

- Fails to recognize the military use of land is incompatible with the conservation designation
- Lack of transparency regarding inspections and procedures for clean up
- Fails to provide any sufficient records of archeological inventory and cultural artifacts
- The studies and records on endangered wildlife is outdated
- Fails to address depleted uranium on site
- Fails to comply with BLNR's constitutional duty

I am a resident of Hilo, Hawai'i and I reject the army's EIS.

Dilon McLaughlin

**From:** [Alfred Medeiros](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D-1 U.S. Military EIS  
**Date:** Thursday, May 8, 2025 10:08:59 AM

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Aloha mai kākou o Alfred Keaka Hiona Medeiros kou inoa no Wai'anae mai au...mahalo chair Chang and DLNR/BLNR board for taking the time to hear our testimony in opposition of the U.S. Military's EIS which is absurd in every way!

Have we forgotten what they've done and continue to do? Or are we gonna just turn the blind eye until they do what they did to Kaho'olawe to Moku o Keawe and other islands.

Enough is enough, they've done enough harm to Hawai'i and our people of this land, as well as caused generational trauma by their actions.

They need a place to practice their war games? Well Texas has the same amount of land and conditions that'll be better suitable for their training than any place in Hawai'i.

Just look at the years of desecration and continued lies they've done...is okay for them to do as they wish without any consequences? Because if it was anybody else, the law would've came down heavily. Are they above the law?

Poisoning our water, destroying our land, bombing burial sites, etc. When will it stop?

IT STOPS NOW! Please reject the EIS that wasn't completed properly or honestly and NO NEW LEASES for the U.S. Military. It's time to do what's right for Hawai'i, for the people...past, present and future.

Mahalo for your time and see you in person for public testimony on Friday.

Aloha a me mālama pono.

**From:** [Ann Kenton Mendez](#)  
**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 11:16:16 AM

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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

Ann Mendez  
Oahu



**From:** [Amanda Merritt](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa Training Area Lease - Testimony  
**Date:** Thursday, May 8, 2025 8:58:26 AM

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Aloha,

I am a resident living in Waimea and I have worked in the fields of environmental science and conservation for the past 17 years.

I am concerned about the environmental impacts of excessive noise pollution, invasive species, unexploded ordnance, and contamination from the Pōhakuloa Training Area on biological and cultural resources, native and endangered wildlife, and our island community.

Our home is 45 miles away from PTA and we can hear live-fire and bombing clearly here and all the way down to the coast. The noise of bombs detonating repeatedly throughout the day and into the night is alarming and distressing.

The EIS should include a survey of residents across the island to collect information on noise pollution and its impact on their lives and families. The EIS should provide information on the extent of the noise pollution from PTA and public health impacts.

The high-elevation, tropical, sub-alpine environment of the Pōhakuloa area, between volcanic mountains, is one of the rarest ecosystems in the world (U.S. Army). This rare ecosystem, with critical habitats and endemic species, that exist nowhere else in the world, is exactly why this land should be protected and preserved—not bombed.

Pōhakuloa provides habitat for rare, native, and endemic plants, insects, and birds including 27 endangered species such as the nēnē (Hawaiian goose) and ‘ōpe‘ape‘a (Hawaiian hoary bat), the only native terrestrial mammal in the state. Military installations in the State of Hawai‘i, including Pōhakuloa Training Area, have the highest number of species listed under the Endangered Species Act in the country (Stein, B.A., Scott, C., Benton, N., 2008. Federal lands and endangered species: the role of military and other federal lands in sustaining biodiversity. Bioscience 58 (4), 339–347).

The EIS should provide the current status and a complete inventory for all rare, native, endemic, endangered, and threatened plant, animal, and insect species in the area, along with all efforts to protect, preserve, and restore their habitats. The EIS should also provide an inventory of invasive species and methods used to prevent and control their spread.

There is no evidence that the U.S. military needs the 23,000 acres of leased land or any of the land that comprises the Pōhakuloa Training Area. With modern military and technological capabilities, military bases abroad, and large installations on the mainland, it is no longer accurate that the state of Hawai‘i, or Hawai‘i Island specifically, is “strategically vital for national defense as a logistics hub and for rapid troop deployment in response to emergent world events.”

The EIS should provide specific evidence and examples of how the leased area and entire PTA is currently “strategically vital for national defense.”

The high-elevation, tropical, sub-alpine ecosystems of Pōhakuloa are unlike any other environment, or possible warzone, in the world. It is inaccurate to claim that the unique environment at PTA is “critical to prepare our troops to ‘fight as they train’ in similar conditions to which they may be deployed.”

The EIS should explain why PTA and the leased area are necessary for training when the U.S. military has large installations on the mainland, in remote areas with mountainous and desert conditions.

If the Army insists on listing financial benefits in EIS documentation and lease negotiations, it should be noted that the U.S. military claims to contribute “a significant number of jobs and money” to the County of Hawai‘i, but employs only “240 personnel on the Island of Hawai‘i.” Therefore, the military provides employment for approximately 0.1% of Hawai‘i Island residents, yet controls 132,000 acres that is the “largest contiguous live-fire range and maneuver training area in Hawai‘i.” Per the online documentation, this is also “the only training area in Hawai‘i able to support larger unit (i.e., battalion and brigade) collective live-fire and maneuver training.” PTA has the largest land area and the greatest environmental impact with smallest economic benefit for the community.

The EIS should explain how PTA, and specifically the leased land, provides economic benefits for residents and provide specific details for the “jobs and money” contributed to Hawai‘i County.

If the U.S. military is going to claim financial benefits to the County of Hawai‘i as part of lease negotiations, the EIS should include a socioeconomic survey of residents. As part of the EIS, the Army should ask residents if the economic benefits outweigh the cost to the environment, public health impacts, and the importance of biological and cultural resources in the area.

As stated in the EIS Scoping Presentations, “PTA is the only training area in Hawai‘i where military units can use weapon systems at maximum capabilities.” It is unacceptable for the military to deploy weapons near our homes, fragile critical habitats, and endangered species—especially at “maximum capabilities.”

The EIS should fully disclose the extent to which the U.S. Army has fulfilled lease requirements and legal obligations to remove ammunition and waste materials. The EIS should provide an inventory of the entire lease area to determine if there is ammunition, unexploded ordnance, depleted uranium, lead, toxins, or other military debris.

The U.S. military has not proven that the leased land or entire Pōhakuloa Training Area—a rare, fragile ecosystem with endemic species and cultural resources—is necessary for national defense or the safety of our country.

I fully support the “No Action Alternative” wherein the Army would not retain any of the State-owned land at Pōhakuloa Training Area. The environment should be restored to its natural condition and returned to the Department of Land and Natural Resources when the lease expires in 2029.

Sincerely,  
Amanda K. Merritt

**From:** [reemz m.](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT the FEIS  
**Date:** Thursday, May 8, 2025 8:55:54 AM

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I stand with community in demanding that the army's final EIS for Pohakuloa should be REJECTED.

The FEIS shows the army's lack of responsibility to these lands and dismisses the valid scientific, cultural and community concerns.

The FEIS does not examine cumulative impacts to avoid addressing failures to comply with Hawaii law.

Ecological damages and climate concerns are dismissed without any justifications. There is a refusal to even assess contamination and damages that the army has admitted to, let alone Greenway's plan for clean up. Therefore there is no proof or assurances that this contamination is not showing into the water and other ecosystems. The army refuses to share data about safety measures or spill data - even going so far as to delete critical information.

The FEIS shows they intend to continue to avoid accountability while continuing to inflict harm on these lands and ecosystems with no regard for the impacts to surrounding communities and future generations.

Pohakuloa is Hawaiian lands and must be treated with care and respect. You, the BLNR Board, have a trust duty to REJECT this FEIS and have ample standing to do so.

Mahalo & Ghilisow.

Rima Miles  
Kapa'a, Kaua'i

**From:** [Rita Miyamoto](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT the Army's final EIS  
**Date:** Thursday, May 8, 2025 9:08:08 AM

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To whom it may concern,

The US Army has proven to be irresponsible land stewards. Do not subject the environment and people to further desecration. Reject the Army's EIS. No more land for the military. If we continue to destroy the land for military use what will be left for the keiki?

Mahalo,  
Rita Miyamoto

**From:** [Micah Mizukami](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: We Demand BLNR to Reject the U.S. Army's Pōhakuloa FEIS  
**Date:** Thursday, May 8, 2025 8:00:03 AM

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

Born and raised on the island of Kauaʻi and descended from Japanese and Okinawan immigrants who settled in Hawaiʻi to work the plantations in the late 1800s and early 1900s, I am writing to you today to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawaiʻi Island.

Although Hawaiʻi Island is across the island chain from Kauaʻi, I have seen the direct impacts of military use of these sacred lands on the island of Kahoʻolawe, first 17 years ago through the Hawaiʻi Youth Conservation Corps and most recently 2 years ago with the Protect Kahoʻolawe ʻŌhana. Restoration and conservation take so many years of hard work, and I have seen just how long it takes for that work to start showing in those 15 years between visiting Kahoʻolawe. I hope that we can see Pōhakuloa begin to heal as well when the lease is up. It is imperative that we get the Army out so the real work of clean up, restoration, and healing can begin. That is what will bring true value to the Native Hawaiian community, and by extension, the Local population as well.

I continue to be baffled at how easy it is for the U.S. military complex to ignore our precious environment and sacred lands and occupy these lands for next to nothing, while our Kanaka families and long-time local families continue to be priced out of these islands we have lived on for generations. In addition, this FEIS fails to meet the basic requirements of Hawaiʻi'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. Where is the accountability? Why is there such a double standard when the military becomes involved?

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 Hawaiʻi'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 humbly 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,

Micah Mizukami  
Associate Director  
Center for Oral History  
University of Hawai‘i at Mānoa

**From:** [Brotha Moa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:14:36 AM

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Aloha Members of the Board of Land and Natural Resources,

My name is Jesse Namoa, 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,  
Jesse Namoa, Mountain View, Hawaii

**From:** [Mariana Monasi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 11:04:31 AM

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

*My name is Mariana Monasi and I live in Keaau. I respectfully urge you to do the right thing and reject the clearly insufficient FEIS in Item D-1.*

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

*We have seen evidence of the negligence and abuse that this land has suffered under this lease for the last sic decades, the basic and crucial requirements have failed to be met almost every single year.*

*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,*

*Mariana Monasi*



**From:** [Rosa Motta](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] 5/9/25 Hearing re: Pohakuloa EIS & Lease  
**Date:** Thursday, May 8, 2025 8:59:03 AM

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Aloha to all whom it may concern,

I am writing today to strongly urge the BLNR to reject the U.S. Army's Environmental Impact Statement for Pohakuloa, and to REJECT ANY PROPOSAL FOR LEASE RENEWAL.

First and foremost, as the BLNR, you have a fiduciary responsibility to the public to act on the interest of the trust beneficiaries (please refer to Kahaulelio v. DLNR, 2019).

Pohakuloa sits within Kaohe; this Waha pans of Kaohe holds Hawai'i's widest and deepest fresh water aquifer. The U.S. Military has shown us loud and clear that we are nothing but a strategic stronghold of the Pacific Rim; it would be foolish to risk compromising the integrity of our water any further with this pollution and desecration of sacred land.

My family and I strongly encourage you to REJECT the final EIS on many grounds, with some of the most prominent being:

1. Military usage is incompatible with the designation of a conservation district.
2. The environmental and Cultural Impact Analysis performed is inadequate; over 20,000 acres of critical habitat have been burned and poisoned already.
3. Concerns about depleted uranium on site have gone unaddressed and show a pattern of neglect and disregard.
4. There has not been sufficient plans to mitigate impacts to cultural and environmental resources and previous damage incurred.

Ultimately, approval of the EIS conflicts with the DLNR & BLNR's mission and constitutional duty to mālama 'Āina.

Ke aloha wale,

Rosa Motta, Pedro Molinero, & Nākoa Molinero

**From:** [Hiilani Naluai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony in opposition to the approval of the Army's FEIS, Meeting Item D-1, 5-9-25  
**Date:** Thursday, May 8, 2025 9:03:40 AM

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

My name is Hi'ilani Kana'iiliakakihikapō Nalua'i. I am from Lā'ie but I live in Makakilo, and I am writing to express my strong opposition to the approval of the Army's Final Environmental Impact Statement (FEIS) for the Pōhakuloa Training Area (PTA).

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

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

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

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

Ke aloha 'āina,

Hi'ilani Kana'iiliakakihikapō Nalua'i

**From:** [Kauai Naniolo](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Opposition To US Army Lease Renewal  
**Date:** Thursday, May 8, 2025 8:53:46 AM

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Aloha Land Board Members:

I am writing as a born and raised Hawai'i island resident 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 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. In addition, over the many decades, the Army has never cleaned or cared for the land they have and continues to damage.

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,  
Kauikeolani Naniolo

Waimea, Kōhala, Hawai‘i

**From:** [Isi'ere Napeahi \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:55:26 AM

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Aloha Land Board Members:

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

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

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

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

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

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

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

Me ke aloha,

Isi'eree Napeahi

Hālau Kū Māna

**From:** [Alex Narrajos](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony in OPPOSITION to the US Army's EIS of Pohakuloa  
**Date:** Thursday, May 8, 2025 11:09:00 AM

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

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

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

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

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

Mahalo nui for the opportunity to testify.

Sincerely,

Alex Narrajos

Alex Narrajos (she/her)  
c: 808.797.6094 (based on O'ahu)



**From:** [Cory Nojima](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] STRONG OPPOSITION to Army's EIS Report about Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 8:49:54 AM

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Aloha BLNR Land Division Members,

Please accept my testimony in **STRONG OPPOSITION** and Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at “our sacred” Pōhakuloa Training Area, Island of Hawai‘i!

As a Native Hawaiian, I have witnessed their lack of care and respect, I personally feel ***Kaumaha ka ‘Āina (sad for our land)***. They (the army) do not steward our ‘Āina with Aloha and continue to ruin the future for our keiki. Enough is enough, they need to return the land and STOP ongoing desecration.

I humbly ask that you vote to **REJECT** this EIS and return the land to our Hawaiian People.

Mahalo,

Cory M. Nojima

**From:** [Shawn Onzuka](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:53:20 AM

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

*My name is Shawn Onzuka and I am 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,*

*Shawn Onzuka*

Sent from my T-Mobile 5G Device

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**From:** [deja marie ostrowski](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Item D-1  
**Date:** Thursday, May 8, 2025 10:01:40 AM

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

My name is Deja Ostrowski, and I am from O'ahu. I respectfully urge you to act as the government watchdog of our public lands, and reject the clearly insufficient FEIS in Item D-1.

One of the most disheartening things is to see our public lands, resources, and everything we hold dear in Hawai'i consistently be auctioned off to what feels like is the lowest bidder and with the lowest requirements. Our constitution on our state make sure that our resources are a trust, and the board, as the trustees, need 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.

Most importantly, we ask you to uphold our Hawai'i specific reviews, put in place to help rectify from the time when we were a territory, and our lands and resources were just used by the Federal government without our say. The cultural surveys, and most importantly assessment of alternative uses of the long-abused land and resources given to other for control, like Pōhakuloa – does not help ups. These are 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. We need you to act in the interest of the public, and require of these people what anyone entering in to a contract would: the most basic assessment of how this will impact our people, resources, cultural traditions and if this use truly is the best use for this parcel.

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

Mahalo nui for the opportunity to testify.

Sincerely,

Deja Ostrowski

**From:** [OVC Office](#)  
**To:** [Moses Kaoiwi](#)  
**Subject:** [EXTERNAL] President Ed Cruickshank's letter on behalf of the Pōhakuloa Training Area  
**Date:** Thursday, May 8, 2025 10:16:14 AM

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To Whom It May Concern,

On behalf of the Oahu Veterans Council—representing 55 Veteran Service Organizations and thousands of veterans and their families—we express our strong support for the continued use of Pōhakuloa Training Area (PTA).

PTA is essential to the readiness and effectiveness of our military. Without it, our troops lose access to the realistic training conditions necessary to survive and succeed in combat. In an era of rising global tensions, especially with adversaries like Russia and China expanding their forces, the need for comprehensive training is greater than ever.

Losing Pōhakuloa would directly impact the preparedness of our service members and, ultimately, our national security. We believe continued access to PTA is vital to ensuring our military remains trained, ready, and capable of defending our nation.

Respectfully,

Edward R. Cruickshank,  
COL, USA(Ret)  
President of The Oahu Veterans Council,  
Chapter Commander, Military Order of Purple Hearts, 483.

--

Hollie Thomas, Executive Director of  
Oahu Veterans Council and Center  
1298 Kukila Street,  
Honolulu, HI 96818  
(808) 422 4000  
email: [executivedirector@theovc.org](mailto:executivedirector@theovc.org)  
website: [theovc.org](http://theovc.org)

To: [blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

Subject: Testimony for Agenda Item D-1

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

*My name is Madison Owens and I respectfully urge you to REJECT the Army's Final Environmental Impact Statement (FEIS) in Item D-1, not only because of its many gaps and discrepancies, but because it is the right thing to do.*

*This FEIS does not meet even the most basic legal requirements for transparency, such as analyzing environmental and cultural impacts, and completing basic surveys so that a true objective assessment can be made about the impacts of proposed Army "retention" of 'āina at Pōhakuloa. The Army has failed to fulfill its responsibilities as a lessee—and it has certainly failed to demonstrate any commitment to stewarding these sacred lands.*

*As a member of the younger generation, I ask you to slow down, and step back from the narrow framework your job may ask you to work within, and instead consider your deep responsibility to protect Hawai'i's land, people, and future generations. If you accept this disingenuous FEIS, you are not just approving a flawed document—you are actively choosing to ignore your obligations to the public trust doctrine, to Native Hawaiians, to our natural and cultural resources, and to future generations.*

*Under the public trust doctrine, the BLNR has a duty 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. The FEIS for the proposed retention of lands at Pōhakuloa lacks the basic information required to even begin to fulfill that obligation. It fails to include comprehensive cultural and biological surveys, omits any good-faith exploration of alternative beneficial uses for these lands, and disregards known and potential harms to endangered species and sacred sites.*

*Moreover, Native Hawaiians have borne a disproportionate burden in witnessing their sacred and stolen 'āina be bombed, poisoned, and desecrated by the U.S. military occupation, specifically Pōhakuloa, for generations. While the 1993 U.S. Apology*

*Resolution acknowledges that the well-being of the Hawaiian people is inextricably tied to the 'āina, this FEIS offers no recognition of that relationship or of the psychological, spiritual, and physical harms that continued military occupation perpetuates. Should their demands for justice, healing, and reconnection with ancestral 'āina at Pōhakuloa be ignored for another 65 years or longer is unconscionable.*

*In addition, the DLNR's own staff has already acknowledged that the FEIS fails to comply with Hawai'i state law—it omits essential biological and cultural surveys, fails to assess impacts to adjacent federal lands, and downplays threats to endangered species, aquifers, and iwi kūpuna. It is a dangerously incomplete document that risks permanent and irreversible harm. In addition, expecting the community to read through thousands of pages of technical jargon to participate is not informed consent, and is unconscionable.*

*By allowing the Army to continue its occupation of Pōhakuloa, you would be disregarding DLNR's own staff, the thousands of voices in our community, and the long legacy of resistance that continues to fight for justice. If this FEIS is accepted, the burden of your decision will fall on the shoulders of our keiki and future generations, who will have to live with the consequences and carry the work of healing that you failed to do.*

*The future will judge these decisions. It is not a matter of if these lands are returned, but when. And when they are, what will your legacy be?*

*So today, I ask you to do the right thing. Stand by your staff, stand by the community, and stand by your mission. Reject this incomplete, insufficient, and harmful FEIS. Put an end to the desecration, and fulfill your responsibility—not just as state officials, but as human beings, as stewards of this 'āina, and as global citizens.*

*Ola i ka wai. Mahalo nui for the opportunity to testify.*

*Sincerely,  
Madison Owens*

**From:** [systems.supine5o@icloud.com](mailto:systems.supine5o@icloud.com)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written testimony  
**Date:** Thursday, May 8, 2025 9:15:38 AM

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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,  
Kaailee Pacatang  
Hilo, Hawaii



**From:** [Kawika Pagan-Barbieto \(2027\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [Kauai Naniolo](#); [Phillippe Fernandez-Brennan](#)  
**Subject:** [EXTERNAL] Pōhakuloa Testimony  
**Date:** Thursday, May 8, 2025 8:01:20 AM

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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,  
Kawika Pagan-Babrbieto  
Oahu, Hawaii

**From:** [pahinuik001@hawaii.rr.com](mailto:pahinuik001@hawaii.rr.com)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuola FEIS - A'ole  
**Date:** Thursday, May 8, 2025 10:46:12 AM

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

I respectfully urge you and the board to do the right thing and reject the clearly insufficient FEIS for Pōhakuola in Item D-1.

This FEIS disregards very clear Hawai'i law, as DLNR staff repeatedly points out in the staff submittal. The Army is not above the law, and they cannot 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 Pōhakuola.

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.

Mālama 'āina,

Kathleen M. Pahinui  
Waialua, North Shore, O'ahu

**From:** [Tejah Paik](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa  
**Date:** Thursday, May 8, 2025 9:40:00 AM

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Aloha Chair and Members of the BLNR,

My name is Tejah Paik, and I strongly oppose the continued desecration of sacred Hawaiian land at Pōhakuloa. I urge you to reject the Army's Final Environmental Impact Statement (EIS).

Pōhakuloa is sacred to Kānaka Maoli. Using it for military training desecrates ancestral lands, destroys cultural sites, and causes lasting environmental harm. This violates your duty to protect Hawai'i's natural and cultural resources.

Reject the Army's Final EIS and stand for the protection of our 'āina and our people.

Mahalo,

Tejah Paik

**From:** [‘Āina Paikai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony to BLNR to REJECT (not accept) the final EIS on Pohakuloa  
**Date:** Thursday, May 8, 2025 8:09:16 AM

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Aloha BLNR members,

My name is ‘Āina Paikai and I do not approve of the final EIS on Pohakuloa. The US Armed forces continues to be poor neighbors in Hawaii and all it's people, including their own members of service that reside here.

I stand in solidarity with those that oppose their renewed lease.

Mahalo,

Aina

**From:** [Casey Park](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the U.S. Army's FEIS for Pohakuloa  
**Date:** Thursday, May 8, 2025 8:44:37 AM

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Aloha,

My name is Casey Park and I am a lifelong Hawai'i resident and kānaka maoli who is urging you, the Board of Land and Natural Resources, to reject the U.S. Army's final environmental impact statement regarding their leased lands at Pohakuloa Training Area.

The Army has caused permanent, widespread contamination of Pohakuloa Training Area lands and beyond, but refuses to assess or clean the area. The Army cannot prove that this contamination has not spread into water or other ecosystems, and dismisses other environmental concerns such as fires, harm to endangered species, or climate risks that result from their activities.

It is the Board of Land and Natural Resources duty to protect Hawai'i's lands from this continued desecration and irresponsible stewardship by the U.S. Army.

Please, I urge you to reject the Army's FEIS in order to defend Hawai'i lands.

Mahalo,  
Casey Park

**From:** [lā'ie](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [Kauī Naniōle](#); [Phillippe Fernandez-Brennan](#)  
**Subject:** [EXTERNAL] Pōhakuloa Letter  
**Date:** Thursday, May 8, 2025 8:01:44 AM

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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,  
Lā'ie Parker

O'ahu

P La'ie Parker  
Hana No'eau Project



**From:** [Haweo Patoc \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:50:14 AM

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Aloha Land Board Members:

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

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

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

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

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

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

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

Me ke aloha,  
Hāweo Patoc  
Hālau Kū Māna

**From:** [Ariel Patterson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony requesting a rejection of the Army's FEIS for Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:38:22 AM

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Aloha,

My name is Ariel Patterson. I grew up on Hawai‘i Island and have lived here for 24 of my 27 years of life. I am currently a resident of Hilo and a student at the University of Hawaii at Hilo.

The continued bombing of Pōhakuloa has been an appalling and inexcusable tragedy to this ‘āina. The level of desecration has been an indescribable pain that its people have had to bear for far too long. The environmental damages caused by the military activities at Pōhakuloa Training Area are immense and the full extent of the harm is not reflected in the FEIS. As a member of the community, I believe that it is all of our responsibility to protect our irreplaceable natural and cultural resources, especially our water systems. History has taught us, particularly at Kaho‘olawe, that continued bombing of ‘āina cracks the water table and renders the entire ‘āina desertified. We cannot allow the atrocity that was committed by the U.S military at Kaho‘olawe to happen on Hawai‘i Island.

The BLNR has a constitutional duty to protect cultural and natural resources for future generations. The FEIS does not meet the environmental, legal, cultural, or ethical standards expected in our state. Thus, I respectfully submit this testimony to ask that you reject the FEIS for the continued military use of Pōhakuloa.

Mahalo,  
Ariel

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Ariel Patterson  
Master's of Science Student  
Student Hire with Plant Extinction Prevention Program  
Tropical Conservation Biology and Environmental Science  
University of Hawai‘i at Hilo

**From:** [Felicidy Phimmasone](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony - Reject the U.S. Army's EIS  
**Date:** Thursday, May 8, 2025 9:17:37 AM

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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, as follows but not limited to:

1. inadequate environmental and cultural impact analysis
2. Lack of a sufficient plan to mitigate impacts to cultural and natural resources
3. Concerns about depleted uranium on the site have gone unaddressed
4. Military usage is incompatible with the conservation district designation

The approval of the EIS ultimately conflicts with the BLNR's constitutional duty to malama 'āina.

**I urge the members of the land and 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.

Aloha 'āina,  
Felicidy Phimmasone  
Kaimukī, Kona, O'ahu



Felicidy Phimmasone  
BA Public Health '25, Incoming MPH-NHIH  
Thompson School of Social Work & Public Health  
Dept. of Public Health Sciences  
[Māpuna Lab](#) Research Assistant  
UH ID 2336 - 9363  
(808) 397-4435 | [felicidy@hawaii.edu](mailto:felicidy@hawaii.edu)

**From:** [Michael Plowman](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on U.S. Army's final Pohakuloa environmental impact statement (FEIS)  
**Date:** Thursday, May 8, 2025 9:32:57 AM

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

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

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

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

*Mahalo nui for the opportunity to testify.*

*Sincerely,  
Michael Plowman  
'Ewa Beach*

**From:** [Barbara Polk](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 11:37:07 AM

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

I respectfully urge you to reject the clearly insufficient FEIS in Item D-1. Other testifiers, and your own staff, have pointed out the serious deficiencies, which I will not repeat here.

I am especially concerned with the impact that accepting a clearly deficient FEIS will have on future decisions by this Board. As I'm sure you are well aware, each of your decisions sets a precedent for the decisions you will make in the future. If you fail to uphold a clear standard for the contents of an environmental review, the BLNR will find it much harder to carry out its mission. Every subsequent applicant required to undergo environmental review before a BLNR action will be able to point to this document and this Board's acceptance of it as the setting the standard for environmental review. Using your action on this FEIS will allow future groups to pressure future Board members to excuse their shortcomings and give in to other deficient environmental reviews—at the expense of the natural and cultural resources you are responsible for preserving for present and future generations.

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

Mahalo for the opportunity to present testimony on this matter.

Sincerely,

Barbara Polk

*Mahalo nui for the opportunity to testify.*

*Sincerely,*

**From:** [Kealii Pooloa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony Regarding FEISI on Pōhakuloa  
**Date:** Thursday, May 8, 2025 10:29:28 AM

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To the Board of Land and Natural Resources,

I am imploring you to REJECT the Army's FEISI, their Final Environmental Impact Statement. You KNOW that the Army has repeatedly destroyed the land that is the Pōhakuloa training site. These last 70 years of bombing, shooting, and all the nefarious ways of the U.S military treats any sacred space, any land that is life giving.

But I'm not sure you know that underneath Pōhakuloa lies our aquifer.. our source of water for Hawaii island. Because Pōhakuloa is essentially Mauna Kea, the water source is there. As we have learned with Kaho'olawe, the military bombed our beautiful island so many times they broke the water table. What was once a life giving island with springs and streams, now lies a dusty red soil gaping wound of an island that no longer has water. If you've ever been to Kaho'olawe, you know that you have to bring all the water you're going to need onto the island. You also will easily see that the military has not followed up on their promise to clean up all their mess. So you know they are not going to clean up all that hewa they have dumped all over Pōhakuloa. Let's also look at Red Hill to see how the military is and has been actively causing devastating and lasting destruction.

We implore you to reject all the lies of the Army. We're done. We demand no more, no more leases to the military, PERIOD. This land belongs to the next seven generations.

Please DO THE RIGHT THING.

Mahalo,

‘Ohana Po‘oloa

--

**Keali‘imakamana‘onalani Shannon Parker Po‘oloa**

*"Lawe i ka ma‘alea e kū‘ono‘ono" ~ Take wisdom and make it deeper.*



May 8, 2025

Testimony of Pu'uhonua o Wailupe

To 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

Aloha mai kākou,

We are testifying as *kia'i* and *'ohana* from Pu'uhonua o Wailupe, a grassroots group of Kānaka Maoli families and community members who *mālama iwi kūpuna* and protect sacred sites in Wailupe. We strongly urge the Board to reject the Army's Final Environmental Impact Statement (FEIS) for Pōhakuloa.

This *'āina* is sacred, and the Army has already caused harm. The Army wants to keep 23,000 acres of Hawaiian Kingdom lands at Pōhakuloa, but the FEIS they submitted is flawed, incomplete, and disrespectful. The State Historic Preservation Division (SHPD) raised multiple concerns that should stop this process in its tracks:

- The Army still has not completed archaeological surveys across all of the lands it seeks to retain. SHPD clearly stated that without full surveys, we cannot even assess the risks to cultural and historic sites, including *iwi kūpuna* and *moepū* (funerary objects).
- The FEIS admits that past training has already caused “adverse impacts” to cultural sites, but offers no binding protections to prevent further damage—especially from wildfires, live-fire exercises, and expanded use.
- Most concerning, the Army failed to incorporate the significant 2022 findings of cultural artifacts and *moepū* into the FEIS. The State Historic Preservation Division (SHPD) specifically noted that “it is difficult to estimate the potential impact of the renewal of this lease without sufficient information on any potential historic or cultural sites in these unsurveyed areas.”<sup>1</sup> A complete EIS must include the full record—not a selective summary.





Our kūpuna are still there—and still being disrespected. As Kānaka Maoli, we have a kuleana to protect iwi kūpuna no matter where they rest. We know that bones, artifacts, and sacred places are still present at Pōhakuloa. The Army's continued bombing and destruction without full knowledge or consultation is a desecration. Their refusal to fully acknowledge what has already been found only adds to the harm.

The State has already failed once. Don't let it happen again. In *Kahaulelio v. DLNR*, the Hawai'i Supreme Court ruled that the State breached its trust duty by failing to monitor, enforce, or protect these same lands. We cannot let history repeat itself. Accepting this flawed FEIS would be a betrayal of that ruling—and a betrayal of your kuleana as trustees.

The DLNR staff submittal gave you the choice: you can reject this FEIS because it does not meet the legal standards under Chapter 343. The information is incomplete, the risks are ongoing, and the public trust has already been violated.

We ask you to do what's right: reject the FEIS. It's about 'āina. It's about kuleana. It's about making sure that cultural and burial sites are not bulldozed, burned, or forgotten. The Army has had more than 65 years and one dollar to prove they can care for this land. They've failed.

Reject the FEIS. Protect our kūpuna. Return the 'āina.

Me ka ha'aha'a,

Michael Hikalea

President, Pu'uhonua o Wailupe

**From:** [Tehani Quitevis](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] BLNR Pōhakuloa Testimony  
**Date:** Thursday, May 8, 2025 8:56:31 AM

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

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,

Tehani Quitevis

Waialua, O'ahu

**From:** [Sean Rabes](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Opposition of Pohakuloa EIS  
**Date:** Thursday, May 8, 2025 8:42:07 AM

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Aloha,

I am writing in opposition of the Environmental Impact Statement for the Army Training Land Retention at Pōhakuloa Training Area for the following reasons:

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

Mahalo,  
Laakea

**From:** [Dea Rackley](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [Dea Rackley](#)  
**Subject:** [EXTERNAL] Reject INADEQUATE EIS FOR POHAKULOA  
**Date:** Thursday, May 8, 2025 9:38:15 AM

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blnr.testimony@hawaii.gov  
D-1 REJECT INADEQUATE EIS for POHAKULOA

Sent from my iPhone

**From:** [Ma"alahi Remmers](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa Testimony  
**Date:** Thursday, May 8, 2025 10:17:39 AM

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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,  
Ma'alahi Remmers  
Hilo, Hawai'i  
Kanaka Maoli, RDMS

**From:** [Gabe Reuter](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa Testimony  
**Date:** Thursday, May 8, 2025 9:06:49 AM

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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,  
Gabriel Reuter  
Hilo, Hawaii  
[gabereuter@me.com](mailto:gabereuter@me.com)



From: [Pohaku Reyes \(2022\)](#)  
To: [DARRIN BARNETT](#)  
Subject: [EXTERNAL] Re: Opposition Agenda Item D1  
Date: Thursday, May 6, 2022 8:56:54 AM

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I strongly oppose the renewal of the 65-year lease for military use of land at Pōhakuoloa Training Area (PTA). I urge the State to **cease all military activity**, including live-fire drills, bombing, and non-compensatory actions in Area D1. I further call on the State to **reject the Final Environmental Impact Statement(EIS)** for the Army's proposed land retention. The EIS is inadequate and fails to properly assess the profound environmental and cultural harms associated with continued military occupation.

**Pōhakuoloa is a wahi pana** — a sacred, storied place with deep significance to Native Hawaiian culture and history. It is also an ecological treasure, home to endangered species found nowhere else on Earth. Continued military operations — especially live-fire training and bombing — **are incompatible with the site's conservation district designation** and violate both legal protections and community values.

The Army has shown it cannot serve as a responsible steward of this land. For example:

- **Nearly 20,000 acres have been burned** under Army management, including critical habitat for endangered species.
- Ongoing live-fire and bombing raise serious concerns about **environmental contamination, water degradation, and public health**, particularly due to the **aerosolization of depleted uranium**, which is linked to cancer and other illnesses.
- The Final EIS **lacks concrete mitigation plans**, and fails to account for both the immediate and cumulative impacts on this fragile and sacred landscape.

The Hawai'i Supreme Court's decision in *Kahaulio v. DLNR* (2019) reaffirmed the State's constitutional duty to **preserve and maintain trust lands**. The Court found that the State had breached its obligations by:

- Failing to adequately monitor military use,
- Neglecting to enforce cleanup and safety requirements,
- Delaying action after learning of contamination or violations, and
- Failing to maintain documentation or transparency with the public.

These failures are ongoing, and the military's history at PTA gives no reason to expect improvement.

**Conclusion:**  
Continued military use of Pōhakuoloa is incompatible with the principles of **mālama 'āina** and the State's constitutional trust responsibilities. This land must be protected and restored, not subjected to further decades of degradation.

I respectfully urge you to:

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

**Protect the 'āina. Uphold your trust duty. Say no to continued military use of Pōhakuoloa.**

Mahalo for your consideration.

Pohaku Reyes

**From:** [Torrance Delos Reyes \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:53:48 AM

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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,  
Okalani Delos Reyes  
Hālau Kū Māna

**From:** [Hawane Rios](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Hāwane Rios Testimony on Item D-1  
**Date:** Thursday, May 8, 2025 9:00:07 AM

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Aloha,

My name is Hāwane Rios and I am Kanaka ʻŌiwi Cultural and Language bearer from Puʻukapu Waimea on the island of Hawaiʻi. I am submitting testimony urging the Board of Land and Natural Resources to reject the FEIS presented by the U.S. Army for the following reasons:

1. The FEIS does not meet environmental, legal, or ethical standards expected of the settler occupying governing State of Hawaiʻi.
2. The Army's failure to consult ʻAha Moku or conduct meaningful analysis of cultural impacts is reason enough to reject the FEIS.
3. The Army's FEIS failed to respond adequately to serious public concerns raised during the draft EIS process.
4. Their responses are not commensurate with the scale of cultural, environmental, and legal impacts raised.
5. The FEIS disregards clear Hawaiʻi law, as pointed out by DLNR staff.
6. The Army is not above the law, yet refuses to complete cultural and environmental impact assessments on federal lands which undermines the state's legal authority and process.
7. The FEIS leaves critical questions unanswered about endangered species, iwi kūpuna, and sacred sites.
8. The FEIS blatantly ignores the unique relationship between Native Hawaiians and the sacred lands of Pōhakuloa. The Military and occupying settler government continues to ignore and disrespect our relationship and our responsibilities to Pōhakuloa.
9. 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.
10. Accepting the deficient FEIS would set a harmful and dangerous precedent.
11. Future applicants may use this as an excuse to bypass proper environmental and cultural review.
12. The Army's failure to consult ʻAha Moku is not only unacceptable, it is dishonorable.
13. Harm to Native Hawaiians is ongoing and ignored.

The BLNR has a constitutional duty and mandate to protect cultural and natural resources for future generations. Without proper biological and cultural surveys, the Board cannot fulfill its

public trust responsibilities. Variations of this Board have historically voted against the concerns of the people and against the wellbeing of our natural resources.

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.

The people of Hawai‘i will hold you accountable for your decisions.

Kū Kia‘i Pōhakuloa,

na Hāwane Rios  
Kumu Akahi o ka Hale Haumea  
Lā 8 o Mei 2025  
Pōhakuloa, Hawai‘i

**From:** [Rebecca Robles](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa Response to Final EIS  
**Date:** Thursday, May 8, 2025 8:10:57 AM

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To whom it may concern:

It is critical that the BLNR reject the current Army EIS. The EIS is inadequate in addressing the environmental and cultural impacts to the area. Pohakuloa is a sacred place, it is home to irreplaceable Hawaiian culture sites and some of Hawaii's most endangered species. The Army has not demonstrated capacity or the will to serve as proper caretaker of this land.

There has been inadequate Environmental and Cultural impact analysis. There are insufficient plans for mitigation for the impacts caused to natural and cultural resources. The concerns for depleted uranium on the site have gone unaddressed. The military usage of Pohakuloa is incompatible with the conservation designation.

The approval of this Environmental Impact Statement greatly conflicts with the Board of Land and Natural Resource's constitutional and moral duty to care for and steward the lands.

As a concerned citizen I strongly urge you to reject the Army's proposed EIS.

The lands have been abused enough- let them be restored and regenerated.

Thank you,

Rebecca Robles

27-400 Kaapoko Homestead Rd

Papaikou, Hawaii 96781

**From:** [Keoni Rodriguez](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:43:47 AM

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Aloha e Chair Chang and Members of the Board of Land and Natural Resources,  
My name is Josiah Rodriguez and I respectfully urge you to do the right thing, and reject the clearly insufficient FEIS in Item D-1.

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

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

Sincerely,  
Josiah Rodriguez

**From:** [Nikola Rodriguez](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject Army's final EIS  
**Date:** Thursday, May 8, 2025 10:03:26 AM

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Aloha,

I humbly request that BLNR REJECT the Army's final EIS. The amount of ammunition's that has been use in the PTA is staggering. There has been little to no evidence of removing any or all the ammunition that was fired. The land has been a left a wasteland. The Hawaiian community deserves to have their land back and cleaned up.

Mahalo for your time

Sincerely,  
Nikola Rodriguez  
[nrodriguezbc@gmail.com](mailto:nrodriguezbc@gmail.com)



**From:** [Kelsie-Kei Rogers](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Stop Military Bombing  
**Date:** Thursday, May 8, 2025 10:51:11 AM

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Aloha board members,

Hawai'i Administrative Rules require agencies to base decisions on adequate documentation. The Army's refusal to conduct required studies makes this FEIS legally insufficient. Rejecting Agenda Item D-1 is the only lawful path forward.

The military's lack of respect for native lands is appalling. Though the lack of state and leadership support in preserving and protecting these lands is even more disappointing. It is our kuleana to malama our āina, our home. We are stewards of the land and of these islands - we will not get a second chance if we destroy it. Please reject agenda item D-1 and support our island home.

Respectfully,  
Kelsie-Kei

**From:** [Kākāʻōlelo Māmalahoa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony. Agenda Item D1. EIS for Pōhakuloa.  
**Date:** Thursday, May 8, 2025 8:41:05 AM

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**Royal Order of Kamehameha I**  
Heiau o Māmalahoa, Helu ‘Elua  
Moku o Hilo, Hāmākua, Ka‘ū  
P. O. Box 6878, Hilo, HI. 96720  
[mamalahoa.org](http://mamalahoa.org)

Aloha Land Board Members:

We, Heiau o Māmalahoa, Chapter 2 of the Royal Order of Kamehameha 1, are writing to express our 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:

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

We, Heiau o Māmalahoa, 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,

Ali'i Sir Kinohi P. Neves

Kākā'ōlelo o Māmalahoa (Talking Chief of Māmalahoa)

Heiau o Māmalahoa, Chapter 2 of the Royal Order of Kamehameha 1

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Mahalo for your cooperation.

**From:** [Elizabeth Royale](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony RE: Pōhakuloa Lease Renewal  
**Date:** Thursday, May 8, 2025 8:41:06 AM

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Aloha,

As a citizen who drinks water of this 'āina, breathes the air, and grows food from the soil I am NOT I'm favor of the lease renewal for Pohakuloa Training Area.

The Board of Land and Natural Resources absolutely must reject the Army's EIS.

We all know it's polluting the environment and damaging the ecosystem to an ungodly degree.

And the ARMY never cleans any of it up and most of it can't be cleaned up. The depleted uranium is proven to be toxic!

Just look at the other islands like Ka'ula and Kaho'olawe! Why does the BLNR and Army still consider this acceptable!?

Use your morals and your brains and do the right thing. Stop the corruption and desecration of the earth.

And make the Army pay up for the ridiculous deficit of rent they owe! \$1 a year and they haven't even paid up in 65 years. Come on!! The value of these islands to the military is unprecedented and that's why this corruption is allowed. For WAR and GREED! All the US Government and Military branches has done is take take take and destroy. Enough is ENOUGH!!

REJECT THE EIS FOREASE RENEWAL

We will stand for Hawai'i always and you should as well!!

ALOHA NO  
Elizabeth Royal  
Kealakekua,  
HI  
96750

May 8, 2025

Board of Land and Natural Resources  
P.O. Box 621  
Honolulu, Hawaii 96809  
[blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

RE: Rejecting the FEIS as submitted by the U.S. Army

Greetings, Board Members:

This to express my strong opposition to the U.S. Army's proposed retention of the wrongfully leased lands at **Pōhakuloa**, currently known as the **Pōhakuloa Training Area**, and to **urge the land board to reject the Army's EIS**.

**Pōhakuloa** is a sacred and storied **wahi pana**, home to irreplaceable **Native Hawaiian historical cultural sites** and some of Hawai'i's most **endangered species**. The Army has not satisfactorily demonstrated the capacity nor it's will to serve as a proper steward of **Pōhakuloa**. Furthermore, the FEIS fails to meaningfully address all these concerns.

For example, throughout the past 63 years (sixty three years!) the Army's destructive actions have resulted in the **burning of nearly 20,000 acres**, including designated **critical habitat** for native flora and fauna. 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 land and water**. **More importantly, the release of depleted uranium has already negatively impacted human life**.

Military training activities of this scale are absolutely not compatible with the needs of Hawai'i Nei. Enough is enough.

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

- 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 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.

Owau nō,  
Owana Ka'ōhelelani Salazar

**From:** [Christina Sanchez](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 10:38:46 AM

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

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

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

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

*Mahalo nui for the opportunity to testify.*

In solidarity,  
Christina Sanchez

**From:** [KAHEALANI Mokuau SCALES](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] PETITION TO REJECT the EIS and END MILITARY LEASES @ POHAKULOA, HAWAII  
**Date:** Thursday, May 8, 2025 9:13:00 AM

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TO:  
Governor Josh Green  
Hawai'i State Legislature  
Hawai'i County Council  
U.S. Department of Defense  
U.S. Army Garrison Hawai'i  
BLNR

I, hereby request via this testimony:

1. The immediate rejection of the Environmental Impact Statement (EIS) for military activities at Pōhakuloa Training Area (PTA) due to its failure to adequately address cultural, environmental, and public health risks.
2. The termination of all military leases at Pōhakuloa and other sacred lands in Hawai'i, which perpetuate harm to the 'āina (land), Native Hawaiian rights, and local communities.
3. A full cleanup of unexploded ordnance (UXO), depleted uranium (DU), and other contaminants left by decades of military use.
4. Respect for Hawaiian sovereignty and the return of these lands to Kanaka Maoli (Native Hawaiian) stewardship.

- Pōhakuloa is sacred land with deep cultural significance, yet it has been exploited for decades by the U.S. military for live-fire training, bombing, and hazardous waste.
- The military's presence has led to irreversible environmental damage, including soil and water contamination, destruction of native ecosystems, and risks to endangered species.
- Communities nearby face health hazards from dust, noise pollution, and potential exposure to toxic materials like depleted uranium.
- The military's lease agreements (many of which were forced or unjust) violate Hawaiian sovereignty and the rights of Indigenous people to protect their ancestral lands.

The EIS is insufficient because it:

- Fails to properly assess long-term health risks to residents and soldiers.
- Ignores Kanaka Maoli cultural and spiritual connections to the land.
- Downplays the irreversible harm caused by continued militarization.

WE stand with the Hawaiian community in saying: NO MORE MILITARY EXPANSION.  
NO MORE LEASES. ENOUGH IS ENOUGH.

E aloha I ke ola,  
Kahealani Mokuau Scales

FreePōhakuloa #StopTheBombing #AinaFirst #MilitaryFreeHawaii

**From:** [Kalena Shim](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda item D-1  
**Date:** Thursday, May 8, 2025 10:59:00 AM

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Aloha Chair and members of the board,

I am testifying today to stand in unwavering solidarity with all those who have long fought to protect Pōhakuloa. This ‘āina is sacred, it holds deep cultural, ecological, and spiritual significance. It deserves healing, restoration, and respect — not another 65 years of military occupation and destruction.

The Army’s Final Environmental Impact Statement (FEIS) is both legally flawed and morally unacceptable. It disregards the cumulative damage already done and fails to honor the stewardship responsibilities owed to this land and to the people of Hawai‘i. Enough is enough.

Please listen to the voices of the community, of the kūpuna, of the ‘āina itself. Vote no on Agenda Item D-1. Let this be the beginning of a new chapter, one of accountability, healing, and true aloha ‘āina

Mahalo for your time,  
Kalena S.



**From:** [Jamie Lynn Silva](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: Agenda Item D-1  
**Date:** Thursday, May 8, 2025 10:41:43 AM

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I oppose Agenda Item D-1 because the FEIS fails to consider the long-term damage to our environment, culture, and health. BLNR must uphold its duty and reject this document.

Signed,  
Jamie Silva  
400 Keawe Street 206  
Honolulu, HI  
96813

@jamielynndee | IG

**From:** [Braden Simao](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] PROTECT POHAKULOA  
**Date:** Thursday, May 8, 2025 10:12:31 AM

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Aloha chair members my name is Braden Kepano Kila Simao and I am emailing to oppose the U.S. army's use of Pohakuloa!

Firstly, using any land in Hawai'i for U.S. imperialism is desecration! Allowing use of any and all land in Hawai'i for U.S. military continues to destroy and further the already immeasurable damage to our 'āina, water sources, health and wellbeing, and with no clean up or management in sight. It's horrifying to know that our local government is giving a second thought to allow MORE LAND to the military when there's NO NEED for it, just like Kaho'olawe and Mākua!

Lastly with the "anti-native" agenda being pushed and funds already getting cut for programs that benefit native people, let's do our kanaka, 'āina, and water right within our local government and reject the army's final EIS!

Mahalo

**From:** [Hollie Simpson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject EIS: Protect Pohakuloa  
**Date:** Thursday, May 8, 2025 8:32:58 AM

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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.

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. 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.

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

The FEIS should be rejected! These are just a few examples as to why:

- 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.

With all the koko flowing through my veins,

HOLLIE OWANA KA'OHELELANI ENOS  
Hawai'i Island  
Hilo, HI

Sent from my iPhone

**From:** [Julie Stone](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Item D-1  
**Date:** Thursday, May 8, 2025 7:59:49 AM

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I respectfully submit this testimony to ask that you reject the FEIS for the continued military use of Pōhakuloa. This document does not meet environmental, legal, or ethical standards expected in our state.  
Enough is enough and some of the most beautiful land on the planet should not be used for military bombing and war games.  
Take it to the continent! The environmental and cultural implications have been grossly overlooked.

Sincerely,  
Julie Siphers

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

My name is Kamauoha Smith. I am a resident of Hilo and I respectfully urge you to reject the clearly insufficient FEIS in Item D-1.

The FEIS fails to meet the basic requirements of adequate biological and archaeological surveys that would allow the Board to assess the full impacts of the renewed lease to the Army. 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. If the FEIS is accepted, more damage will likely be done to the culturally significant sites throughout the PTA. Thus, more psychological, spiritual, and physical harm will be done to the Native Hawaiian community.

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

Mahalo nui for the opportunity to testify.

Me ka pono,

Kamauoha Smith

**From:** [Kapiolani Spencer](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] RE: OPPOSITION TO THE RENEWAL OF POHAKULOA TRAINING FACILITY LEASE  
**Date:** Thursday, May 8, 2025 10:05:59 AM

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To Whom it May Concern,

I am a resident of Moku 'o Keawe (Hawai'i Island). I attest to the renewal of Pohakuloa Training Facility due to the poor and unexceptable management of Hawaiian Home Lands and find it very sickening and double standards that the military pays only 1 dollar a year to desicrate our precious natural land and resources NOT to mention our sacred places and burials. This is unheard of in the United States but they do it here in Hawaii. Stop the desicrtion of our Lands, Natural resources, and burials.

The United States is here in Hawaii illegally, show me proof of Hawaii's consent to the US, allowing them the rights to demolish our Hawai'i Kingdom and hold her majesty Queen Liliuokalani subjects captive all these years. We are of a Sovern Nation under the Hawaiian Kingdom Government and at NO time did my ancestors or I approved to be a part of this crime imposed on our Hawaiian people, under this illegal occupation by the US and all it's acting constituents.

So, under the Hawaiian Kingdom Government as a Sovern Heir to the Hawaiian Kingdom I pledge homage to my country and everything from 1893 till present day is all WAR CRIMES on the Hawaiian Kingdom Government and Subjects.

So, this letter is in opposition to the renewal of the United States Military under the jurisdiction of the United States be given rights to desicrate this land NO more and definitely NOT for a dollar a year, what the muck is that? It's sad and unheard of only here in Hawaii where our predecessors still run a muck treating Hawaii our home as if it's the "Wild, Wild West.... No respect for anything Hawaii, poor stewards of the land.

No, NO MORE DESICRATING our Honua o Hawai'i nei... The genocide ends here and now for our people. No, lease renewal for United States Military at Pohakuloa.

Please add my testimony to your agenda for public open testimony, Mahalo, Kapi'olani Spencer from "Aloha a Malama 'Āina a Nā Poe o Hawai'i Nei ".

**From:** [Kanoelani Steward](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:47:59 AM

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Aloha nui e ka BLNR,

My name is Kanoelani Steward and I am writing to ask that you reject the FEIS in Item D-1.

The BLNR has a duty and obligation to uphold our public trust doctrine - to protect our natural and cultural resources for present and future generations. The FEIS fails to show the serious environmental impacts to our landscape and our native flora and fauna. Accepting this document will allow the shortcomings of other entities and/or applicants that will also be going through the BLNR process of environmental review. Please do not allow this to be an example of a thorough process of the impacts of our 'āina.

Please uphold the law and the BLNR mission and reject the FEIS in Item D-1.

Mahalo nui,  
Kanoelani Steward

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**From:** [Claud Sutcliffe](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Pohakuloa  
**Date:** Thursday, May 8, 2025 9:33:05 AM

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Please reject the application to renew the Army's lease at Pohakuloa!  
Mahalo Piha!

Claud Sutcliffe, PhD  
P.O. Box 143  
Volcano, Hawai'i 96785  
Sent from my iPad



**From:** [Teva Tafuna \(2030\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:57:44 AM

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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,

[TEVA]

[Optional: OAHU]

**From:** [Laurie Takeno](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Pōhakuloa, Reject EIS  
**Date:** Thursday, May 8, 2025 8:52:08 AM

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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. It is what makes Hawai'i, Hawai'i. Without proper care for this land, Hawai'i will lose critically significant ecological, cultural and economic stability. 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. Military training must prioritize the health, safety and well-being of the people living here or it violates its own moral codes of national security.

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 that will benefit all parties. Healing will be a win-win situation for the military.

Humbly,  
L. Takeno

**From:** [Taysia T](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] D1, Pōhakuloa Testimony  
**Date:** Thursday, May 8, 2025 8:29:53 AM

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Aloha Land Board Members:

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

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

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

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

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

- Inadequate Environmental and Cultural Impact Analysis

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

- Concerns about depleted uranium on the site have gone unaddressed

- Military usage is incompatible with the conservation district designation

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

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

Me ke aloha pumehana,

Taysia Tangjian

Waianae, HI

**From:** [Maui Tauotaha](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1 – REJECT the Army's FEIS for Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:59:26 AM

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## **Aloha Chair Chang and Members of the Board,**

My name is Marirai Maui Tauotaha, and I submit this testimony in **strong opposition** to the U.S. Army's Final Environmental Impact Statement (FEIS) for continued use of lands at Pōhakuloa Training Area (PTA) and urge the BLNR to **reject this document**.

This is more than a land use issue. It is a test of whether the State of Hawai'i honors its duty to the 'āina, to the public trust, and to future generations.

**Chair Chang, we know you understand how deeply place, identity, and kuleana are connected in Hawai'i.** You've spent your life navigating the intersection of law, land, and culture. The Army's FEIS fails on all fronts — legally incomplete, environmentally negligent, and culturally dishonest. It leaves burial sites unacknowledged and known harms unaccounted for.

Our keiki are learning about this. They are trusting you — not just as a lawyer, not just as a Chair, but as someone who understands what it means to stand for the 'āina. Please show them that leadership grounded in 'ike Hawai'i and pono decision-making still lives in our public institutions.

For over 60 years, the Army has bombed, shelled, and contaminated nearly 23,000 acres of "ceded" public lands at Pōhakuloa — lands leased for just **\$1**. Over **1,000 wildfires**, destruction of native ecosystems, exposure to **depleted uranium**, and **desecration of cultural sites** have left deep, long-lasting harm. These are not abstract impacts. They are visible scars seen on the land and felt in the community, literally risking the health of residents when bombs and winds place depleted uranium into the air.

The Army's FEIS is legally and morally insufficient. It fails to:

- - Fully disclose the cultural and environmental destruction already caused;
- - Provide adequate plans for future cleanup or remediation;
- - Address the presence of **burial objects** and cultural artifacts, which were omitted

from the document entirely;

- Include meaningful consultation with Native Hawaiian cultural practitioners;
- Comply with environmental and public trust standards under state law.

Even **DLNR's own staff** have raised serious concerns about the FEIS's failure to meet legal requirements and follow clear guidance. To accept this document would not just be premature — it would be a dereliction of the Board's constitutional duty to **mālama 'āina** and safeguard trust lands.

The long-term health impacts of military training at Pōhakuloa are deeply troubling. The use of depleted uranium (DU) munitions raises serious public health concerns — especially as particles become airborne and can be inhaled or **contaminate water sources**.

The presence of unexploded ordnance (UXO) makes large areas dangerous or permanently inaccessible, posing risks not just to military personnel, but to future generations of civilians, hunters, and cultural practitioners. Continued use without a plan for comprehensive cleanup and health risk assessment is irresponsible and violates the public trust.

One of the most serious failures of the Army's Final Environmental Impact Statement is its omission of known burial objects and culturally significant materials. This is not a clerical error — it's a willful exclusion.

The fact that these discoveries were not included in the FEIS, despite being known to the Army, reveals a troubling pattern of dishonesty and disrespect. This undermines the entire credibility of the document and raises serious questions about how many other cultural sites or iwi kūpuna have been ignored, undocumented, or destroyed.

Any process that disregards ancestral remains and sacred materials is not just incomplete — it is fundamentally flawed and offensive. The BLNR has a responsibility to hold the Army accountable to the truth.

This lease is not an isolated case. Several military leases across Hawai'i are set to expire in 2029. The BLNR's decision on this FEIS will set a precedent for how we value and protect public lands statewide — including lands at Makua Valley, Kawaiiloa, and other heavily impacted areas.

Let us also consider **what happens after the lease ends**. If the Army walks away without



fully removing unexploded ordnance or remediating contamination, this land will remain inaccessible and dangerous for decades — if not forever. That effectively makes this lease permanent. **A \$1 lease for 60 years should not end in permanent exclusion from public lands.**

For context, the federal government authorized **\$400 million** for the cleanup of Kahoʻolawe, which is **about one fifth the size** of Pōhakuloa. Even today, that island remains unsafe to access in full. Are we prepared to let the same fate befall Pōhakuloa?

Meanwhile, in classrooms across Hawaiʻi, **our keiki are learning about this issue**. They understand what's at stake. They are asking what kuleana looks like. And they are watching to see whether our leaders will stand for accountability, integrity, and care.

Finally, I want to be clear: **you do not need to be Hawaiian to care about Hawaiʻi**. You do not need to live here to know that bombing irreplaceable lands, underpaying their value, and evading cleanup obligations is wrong.

By rejecting this EIS, you are not ending the conversation — you are demanding that it begin on truthful, respectful, and lawful terms.

Please stand with the people. Stand with our children. Stand for our future. **Reject the Army's FEIS for Pōhakuloa.**

Mahalo for your time, service, and kuleana.

Sincerely,

Marirai Maui Tauotaha

Oʻahu | [maui.tauotaha@gmail.com](mailto:maui.tauotaha@gmail.com)

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

My name is Malia Taylor-Wolfe, and I respectfully urge you to do the right thing and **reject the clearly insufficient FEIS in Item D-1**. I am a law student at the University of Hawai‘i William S. Richardson School of Law.

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

The 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 Taylor-Wolfe  
Honolulu, Hawai‘i

**Laulani Teale, MPH**  
**Ho'opae Pono Peace Project**



May 8, 2025

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

**Testimony of Ho'opae Pono Peace Project on Item D-1, Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai'i, Tax Map Keys (TMKs) (3): 4-4-015:008; 4-4-016:005; and 7-1-004:007.**

Aloha kākou,

Ho'opae Pono Peace Project is a cultural peace resource focused on building cooperative solutions in the context of Aloha 'Āina, human rights, and genuine perpetuation of Indigenous well-being and cultural continuity.

We urge you to outright reject the EIS proposed by the United States Army. Errors and omissions throughout the document are both rampant and obvious, but this is not our primary focus. We do not want the Army to merely correct its "homework" and return with an "improved" document, wasting State time and resources and dragging our Lāhui through yet another hearing over this matter. We ask that you instead reject the EIS outright and require the United States to use the next four years to clean up, pack up, and get out. Any further cleanup does not require a lease, as it can be done on State-controlled lands during rehabilitation.

We are available as a peace resource for continued dialogue in the building of genuine understanding based on true respect, peace, and pono. Please contact me at any time.

Mahalo nui loa,

A handwritten signature in black ink, appearing to read 'Laulani'.

Laulani Teale, MPH  
Coordinator, Ho'opae Pono Peace Project  
<https://www.eapono.org>



**From:** [Tiana Thorp](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] TESTIMONY: REJECT THE ARMY'S EIS - IT IS NOT SUFFICIENT  
**Date:** Thursday, May 8, 2025 8:56:07 AM

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Aloha pumehana kākou,

Mahalo kēia hui `ana. I hope this message finds you well and in good health.

I am reaching out to submit testimony and EQUIVOCALLY STATE that BLNR needs to reject the Army's EIS. Enough is enough! The environmental and cultural impact analysis was inadequate. There is no sufficient plan to mitigate impacts on cultural and natural resources. Concerns about depleted uranium on the site have gone unaddressed. Continued military usage is incompatible with the conservation designation. The approval of the EIS ultimately conflicts with the BLNR's constitutional duty to mālama `Āina.

Again. BLNR needs to reject the Army's EIS.

Mahalo for taking the time to read this. Please do the right thing here by Native Hawaiians. A hui hou, mālama pono.

Aloha mai,

Tiana

**Tiana Noelani Thorp, EIT (she/her/hers)**

Distinguished Scholar Fellow | PhD Candidate | University of Delaware

Department of Civil, Construction, and Environmental Engineering | College of Engineering

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*The University of Delaware in Newark, DE is a land-grant university located within the traditional homelands of the Nentengo or Nanticoke nation and Lēnapehōkink, the ancestral homelands of the Lenape Haki-nk or Lenni-Lenape nation. During the colonial era and early federal period, many were removed west and north, but some also remain among the continuing historical tribal communities of the region: The Nanticoke Lenni-Lenape Tribal Nation (<https://nlltribe.com/>); the Ramapough Lenape Nation (<https://ramapoughlenapenation.org/>); and the Powhatan Renape Nation, The Nanticoke of Millsboro Delaware (<https://www.nanticokeindians.org/>), and the Lenape of Cheswold Delaware (<http://www.lenapeindiantribeofdelaware.com/>).*

**From:** [Kupaianaha Thurman](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Please reject the Army's Final EIS  
**Date:** Thursday, May 8, 2025 9:14:48 AM

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Please reject the Army's Final EIS. I wish I had more time to write and submit this. Mahalo and God Bless

Kupaianaha Thurman

**From:** [Alyssa Tinao](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] URGENT REJECT FEIS  
**Date:** Thursday, May 8, 2025 9:22:01 AM

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I Alyssa Tinao submit this testimony to ask that you please respect Hawai'i and it's people and REJECT the FEIS for the continued military use of Pōhakuloa for too many reasons! This document does not meet environmental, legal, or ethical standards expected in our state.

Mahalo

**From:** [Keiana Tuitele](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, May 8, 2025 11:28:58 AM

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## Testimony 10

*Aloha. I go to Kamehameha Schools Maui and I'm testifying against Item D-1. As a young Hawaiian, I feel the weight of our history—the illegal overthrow, the bombing of Kaho'olawe, the militarization of our mountains. It's time to end this cycle. Deny the lease. Deny the EIS. Give our land and our future a chance to heal.*

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**From:** [Layson Uini-Popo](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] BLNR Testimony  
**Date:** Thursday, May 8, 2025 9:08:31 AM

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

My name is Layson Uini-Popi. I am from the Waiʻanae District on Oahu, Hawaiʻi, and I am writing to express my strong opposition to the approval of the Army's Final Environmental Impact Statement (FEIS) for the Pōhakuloa Training Area (PTA).

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

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

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

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

Ke aloha 'āina,



Layson Uini-Popo



May 8, 2025

To: Board of Land and Natural Resources  
P.O. Box 621  
Honolulu, HI 96809  
blnr.testimony@hawaii.gov

From: Nohopapa Hawai'i, LLC  
Native Hawaiian Organization  
PO Box 197  
Hakalau, HI 96710

**Subject: Opposition to the Final EIS and the U.S. Army's Proposed Retention of Leased Lands at Pōhakuloa Training Area**

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area (PTA) and to urge the Land Board to reject the Army's Environmental Impact Statement (EIS).

Pōhakuloa is a wahi pana, wahi kapu, wahi kupuna, and a continuous cultural landscape stretching from the Pu'uhuluhulu region in Hilo to Ahu a 'Umi Heiau in Kona, as well as the conservation lands surrounding Pu'u Kapele and Pu'uke'eke'e within the Kohala District. The name Pōhakuloa itself references a significant Native Hawaiian deity associated with canoe makers, ko'i (adze) specialists, and the protector of the waters of Kāne on Maunakea.

In the ka'ao of Kamiki and Maka'iole, Pōhakuloa is depicted as a vital landscape where water travels from the highest peak of our mauna to Lake Waiau, then to Pōhakuloa Gulch, and finally into the flat interior lands. These waters flow underground through caves and the aquifer. Pōhakuloa is also situated within the ahupua'a of Ka'ohe (Bamboo), named for the lush greenery that blankets the makai side of Mauna Kea and the water held within bamboo at its base. This name also highlights the ahupua'a characteristic of holding subterranean water known as the Pōhakuloa aquifer.

The existence of the Pōhakuloa aquifer was confirmed during water testing for the TMT project on Mauna Kea, revealing a unique dyke system separate from the main aquifer. The Army, however, did not permit testing for contaminants, and it was noted that the aquifer contains ancient water that has been stored for an extended period.

These examples demonstrate the profound cultural connection and significance of Pōhakuloa, which have been overlooked in previous Archaeological and Cultural Impact Assessment (CIA) studies. The Army's EIS fails to recognize Pōhakuloa's cultural importance within the broader 'āina mauna landscape, including the lands between Mauna Kea, Mauna Loa, and Hualālai. Furthermore, it disregards the perspectives and cultural knowledge of Native Hawaiian Organizations (NHOs) and the public.

PTA encompasses over 1,000 historic properties, including numerous features such as burial caves within the conservation district, cave systems with extensive archaeological evidence, thousands of



pahoehoe pits used for ua'u bird catching, ahu with upright pōhaku, volcanic glass quarry sites, trails, cairns, and unique artifacts. Despite the Army's commitment to preserving these historic properties, many have been impacted or destroyed by military activities.

Additionally, PTA has revised the impact zone from its original footprint, decreasing the buffer area without formal documentation. Archaeological surveys conducted by previous cultural resource staff have documented numerous unexploded ordnance (UXOs) within training areas that were supposedly cleared. Furthermore, the state-leased lands are littered with remnants of ammunition, bomb materials, MRE trash, spent ammunition, abandoned military equipment, and other debris. Military archaeological features often contain trash deliberately concealed within cave openings.

Contrary to Army statements, depleted uranium (DU) has been identified at PTA. Independent UXO consultants have discovered 2-4 areas containing DU, yet the Army has downplayed the findings, stating that the amount is insignificant. This lack of transparency raises concerns about the Army's honesty and commitment to addressing potential environmental hazards.

The Final EIS is insufficient and should be rejected for the following reasons:

- Inadequate environmental and cultural impact analysis
- Lack of a comprehensive mitigation plan for cultural and natural resources
- Unaddressed concerns about depleted uranium contamination
- Incompatibility of military use with conservation district designation
- Conflict with the BLNR's constitutional duty to mālama 'āina

Nohopapa Hawai'i respectfully urges the Land Board to honor the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. The Army has not demonstrated the capacity or commitment to be responsible stewards of this sacred land, and the FEIS fails to adequately address these critical concerns.

Mahalo for your consideration,

A handwritten signature in black ink, reading "Kelley Lehuakeaopuna Uyeoka".

Kelley Lehuakeaopuna Uyeoka, MA  
Founder and Partner  
Nohopapa Hawai'i, LLC  
[www.nohopapa.com](http://www.nohopapa.com)

**From:** [Maile Villablanca](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:59:51 AM

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

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

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

Please 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,

Maile Villablanca

**From:** [Maya Maxfield Villard](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject Army EIS Testimony  
**Date:** Thursday, May 8, 2025 8:38:07 AM

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To whom this may concern,

The desecration of Pōhakuloa shall no longer be allowed and sacred grounds must be given back to native Hawaiians. The final EIS is rejected on several grounds:

- Inadequate environmental and cultural impact analysis
- No sufficient plan to mitigate impacts to cultural and natural resources
- Concerns about depleted uranium on the site have gone unaddressed
- Military usage is incompatible with the conservation of designation
- The approval of the EIS ultimately conflicts with the BLNR constitutional duty mālama 'āina.

The army has burned nearly 20,000 acres of this wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of the most endangered fauna and animals. It is important that we protect and restore these sacred grounds to natives who know how to take care of it.

Mahalo and Reject the renewal of this land lease to the army.

--

Maya Villard  
Marine Biology Undergrad  
Hawai'i Pacific University

Subject: Testimony Submission, Agenda Item D-1 (Pōhakuloa EIS) - May 9, 2025  
BLNR Meeting

To: [blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

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Aloha e ka BLNR,

This testimony is submitted on behalf of my ‘ohana and myself. I, Nākai‘elua Villatora wahine maoli, ho‘oilina Hawai‘i, makuahine. Ku‘u kane, Fletcher Parker a me ku‘u mau keiki Kekāhili a me Kapeka. We request the Board of Land and Natural Resources (BLNR) to **REJECT & DENY** the United States of America Army Environmental Impact Statement (EIS) for its insufficient inclusion of;

- Environmental and Cultural Impact Analysis,
- Lack of Sufficient Plan to Mitigate the impacts to Cultural and Natural Resources,
- No address pertaining to the depleted uranium on site,
- Lack of proper burial treatment and disclosure to the treatment of iwi kūpuna (ancestral bones), wahi ‘ilina (burial site), ana (cave system) and moepū (funerary objects).

Board of Land and Natural Resources should consider that the EIS;

- Incompatibility of Military usage with the conservation designation,
- The approval of the EIS ultimately conflicts with the BLNR’s fiduciary duty to Mālama ‘Āina

The “Ceded Lands” of Pōhakuloa were never lawfully ceded. No treaty of annexation was ratified and the rightful descendants were never consulted. Ke kū nei kanawai no laila. These lands contain not only iwi kūpuna, sacred water sources (wai), ‘āina, mo‘olelo, ‘uhane hana and no‘eau Hawai‘i.

WE DO NOT CONSENT.

We call for an immediate halt to this process and demand that all military-related land use cease until jurisdictional truth is resolved under equity, not OCCUPATION.

Ho‘oilina Hawai‘i mau a mau,

Nākai‘elua Villatora

Fletcher Parker

Kekāhili Parker

Kapeka Parker

**From:** [Natasha Waiau](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony For POHAKULOA!  
**Date:** Thursday, May 8, 2025 9:24:42 AM

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By not completing archaeological surveys or identifying historic properties, the Army's FEIS disregards obligations under both state and federal preservation laws. Proceeding with Agenda Item D-1 would expose the Board to legal challenges and undermine your credibility.

**From:** [ibdern@sbcglobal.net](mailto:ibdern@sbcglobal.net)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Opposition to Renew lease at Pōhakuloa  
**Date:** Thursday, May 8, 2025 11:31:58 AM

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Aloha,

My name is Dernie Waikiki. I reside at 82-1031 Nanaina Lani Place in Ka'awaloa (Captain Cook), on Hawai'i Island.

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.

The 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.

If the BLNR accepts this deficient FEIS, it would set a dangerous and harmful precedent. It could allow future applicants to use this as an excuse to bypass proper environmental and cultural review. I believe it will weaken the integrity of BLNR's oversight for years to come.

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,  
Dernie Waikiki  
(808) 3747-2387



**From:** [Maria Walker](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Please reject the current EIS and lease extension for Pohakuloa  
**Date:** Thursday, May 8, 2025 8:09:58 AM

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Aloha Members of the BLNR,

I am writing today to strongly urge you to reject the current EIS submitted by the Army for Pohakuloa training area and their request for a 65 year lease extension.

The current EIS does not sufficiently acknowledge the historical and cultural significance of Pohakuloa or have a plan to protect these resources, and has not submitted any realistic or thorough plan for mitigating or preventing negative environmental impacts.

This area is a sacred site for the Hawaiian people, which contraindicates any of the military uses it has suffered. Not only is Pohakuloa culturally and spiritually significant, but it is a conservation district that is home to endangered plant and animal species, many of them endemic. The military routinely uses the site for live fire and bombing exercises, including using weapons containing depleted uranium; it is impossible to prevent the dramatic negative impacts on flora, fauna, and the land itself that result from these actions.

I remind all of you that in 2019, the Hawaii Supreme Court ruled that the state has a critical responsibility to preserve and maintain public lands as part of our constitution's stipulation that our government prioritize malama 'aina as a foundation of its obligation to the public trust. This is a proactive, preventative action that does not wait for violations to respond; it means that the state and county governments must act preemptively to protect the 'aina and its flora and fauna.

I firmly believe that the US military use of Hawaiian land and waters has resulted almost invariably in environmental and cultural degradation and destruction, with little to no monitoring or accountability to engage in environmentally protective actions and mitigate the many harms that have occurred. I respectfully beseech you to reject this lease extension, and to return Pohakuloa to its rightful designation as a conservation area that is not a place for the heedless and destructive use of our public lands, which are held in perpetuity for our people and our future generations. Please uphold the responsibility bestowed on the Bureau to protect and care for our precious natural resources and prevent further devastation at Pohakuloa.

Thank you for hearing my testimony,  
Maria Walker  
1728 Hulu Rd.  
Kapa'a, HI 96746

## **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 Kalanimanuia Wong, 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,

Kalanimanuia Wong  
Honolulu, O'ahu  
Hui Aloha 'Āina o Honolulu

**From:** [Sage Warner](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Please REJECT the FEIS put forward in Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:50:57 AM

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*My name is Sage Warner from the big island of Hawaii, and I respectfully urge you to do the right thing, and REJECT the clearly insufficient FEIS in Item D-1.*

*My sister used to work on Pohakuloa and once shared a story of a population of Tetramolopium arenarium that she and her colleagues were monitoring. As we all know, so many of our endemic native species need to be protected and aided in their continued existence. The army nearly set it's last and only population on fire from a flare fired from a helicopter during a training drill.*

This is only one example of how the army's presence directly harms our island ecosystems.

*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.*

*Sincerely, Sage Warner*

**From:** [Kano Watanabe](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Stop The Desecration Of Pōhakuloa  
**Date:** Thursday, May 8, 2025 10:45:26 AM

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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,

Kano Watanabe  
Makawao, Maui

**From:** [Rowan Weatherstone](#)  
**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 8:09:10 AM

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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,  
Rowan Weatherstone  
Hilo Hawaii  
808 365 2298  
[Rkw360@gmail.com](mailto:Rkw360@gmail.com)

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**From:** [Kanoë Wilson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony in Opposition of Agenda Item D-1  
**Date:** Thursday, May 8, 2025 8:34:50 AM

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

Date: May 8, 2025

Aloha e Chair Chang, nā lālā o ke Kōmike,

O wau nō ‘o Dr. Kanoë Wilson, he kama o Hawai‘i nei, he kanaka ‘ōiwi, a he kupā ‘āina o ka mokupuni ‘o Hawai‘i. I stand in strong opposition to the acceptance of the Final Environmental Impact Statement (FEIS) for the Army’s proposal to retain nearly 23,000 acres at Pōhakuloa. These are not simply “state lands”—these are stolen Hawaiian lands, seized and occupied without consent, held under the long shadow of an illegal occupation. The BLNR has both the authority and the kuleana to reject this FEIS and take a principled stand for our ‘āina, our lāhui, and our future.

As a kanaka, as a mother, as an educator, and as someone deeply grounded in the ‘ike and values of this ‘āina, I cannot ignore the harm that continues to unfold at Pōhakuloa under military use. This FEIS is deeply flawed—riddled with gaps, dismissive of cultural protections, and negligent in its environmental accountability. It attempts to justify continued destruction without meeting even the basic standards required under HRS Chapter 343.

Some of the most concerning failures include:

### **Toxic Waste Without Cleanup or Monitoring**

The Army admits to contamination—lead, diesel, spent munitions—yet offers no concrete plan to clean or even monitor the impact. To claim that minimal rainfall reduces risk is both scientifically unsound and irresponsible, especially considering our vulnerable aquifers and the long-term threat to water systems. We don't want to see another repeat of Kaho‘olawe!

### **Wildfire Ignorance During a Time of Climate Crisis**

Over 1,000 of the 2,000+ wildfires at PTA since 1943 have been directly caused by Army activity. Still, this FEIS offers no clear or effective wildfire mitigation plan. This is unacceptable—particularly during Wildfire Awareness Month, when our communities are reminded how real and devastating these risks are.

### **Outdated Air Quality Data**

The latest data cited in this report is from 2007. Nearly two decades have passed, and communities downwind of PTA have no idea what they’re breathing. This is not environmental stewardship—it’s negligence.

### **Incomplete Cultural Review and Lack of Proper Consultation**

The Army has failed to conduct a full cultural survey of lands we know to contain iwi kūpuna



and significant cultural sites. The FEIS notes their presence but sidesteps its legal obligation to consult Island Burial Councils and engage with lineal descendants. This failure is not just procedural—it is a continued act of cultural erasure.

### **No Incidental Take Permit for Terrestrial Impacts**

Despite the known presence of endangered species, no terrestrial Incidental Take Permit is presented. The Army would not be allowed to do this in our nearshore waters—why should it be allowed on our mauna?

### **Disregard for Cumulative Impacts**

By artificially narrowing the scope to 23,000 acres, the FEIS fails to address the full impact of military use across the adjacent 110,000+ acres. It fragments analysis, undermines the integrity of the environmental review, and misleads the public.

### **Breach of the Public Trust**

These are “ceded” lands—held in trust for Native Hawaiians and the broader public. To continue their use as a live-fire zone dishonors that trust. The state has a fiduciary and moral responsibility to protect these lands—not enable their destruction.

### **Military Use is Incompatible with Conservation Law**

Many of the PTA parcels fall within the Conservation District, where such training activities are not permitted. Even the Office of Conservation and Coastal Lands has confirmed that live-fire, tracked vehicle use, and heavy munitions violate the intent of conservation zoning. The FEIS fails to reconcile this contradiction.

### **He Kuleana Ko Kākou.**

The Army has had more than 70 years to demonstrate care for this ‘āina. Instead, we have seen wildfires, pollution, cultural desecration, and a persistent pattern of non-compliance. Enough.

I urge you—Reject this FEIS. Do not rubber-stamp further desecration. Stand for Pōhakuloa. Stand for Hawai‘i. Stand for our keiki.

Me ka mahalo no ka ho‘olohe ‘ana mai a me ka ho‘okō pono ‘ana i ke kuleana,

Dr. Kanoe Wilson

Hilo, Hawai‘i

Concerned community member, educator, and kanaka ‘ōiwi

**From:** [kawai winchester](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Pohakūloa  
**Date:** Thursday, May 8, 2025 10:59:32 AM

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

*My name is Kawai Winchester and I am from Kāneʻohe but I also have ʻohana that lives on Hawaiʻi. 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 ʻāina 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 ʻāina. 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) ʻāina at Pōhakuloa be ignored for another 65 years or longer.*

*This FEIS, also, disregards clear Hawaiʻi 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 ʻāina in Pōhakuloa.*

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

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

*Mahalo nui for the opportunity to testify.*

*Sincerely,*

*Kawai Winchester*

**From:** [Caroline Wissmann](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1  
**Date:** Thursday, May 8, 2025 9:43:52 AM

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[blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

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

*My name is Caroline Wissmann and I am from Koko'iki, Kohala, Moku O Keawe. 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,*

*Caroline Wissmann*

*(808)853-0293*

*Ckdemercer@yahoo.com*

Sent from my iPhone

**From:** [Nani Wolfgramm](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony against Pohakuloa  
**Date:** Thursday, May 8, 2025 8:05:35 AM

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The United States Army at Pohakuloa, which for over 75 years had the lease paying 1 dollar for desecration of our land and sacred places. They have falsely provided Environmental Impact Studies about archeological findings which were withheld so that the military would be able to utilize Pohakuloa as a military training program. All these years the US military had contaminated our water, land, and continued to desecrate our burials and falsified crucial information allowing this desecration to continue all these years. I oppose the US government getting another 65 years at Pohakuloa. No more bombing and desecration of our Sacred Places, all of our honua of Hawai'i is considered sacred and we as the original people of this land need to assert our rights as Kanaka Maoli and fight for our freedom from the demise and control of the United States Government. All War crimes!

I OPPOSE!! I OPPOSE!! I OPPOSE!!

Mahakaa K. Wolfgramm  
Makahaa M.A. Wolfgramm  
Hinamaikalani K.A. Wolfgramm  
Imaikalani T.A. Wolfgramm  
Amelila K. Wolfgramm  
Mauiakalana Wolfgramm  
Harolyn "Nani" Wolfgramm

Aloha Chair Chang and Members of the Board,

My name is Matt Chalker, and I serve as Executive Director of the Wildfire Safety Advocates of Waikōloa (WSAW), a nonprofit organization committed to advancing fire resilience and public safety throughout Waikōloa Village and neighboring communities on Hawai‘i Island.

We respectfully submit this testimony in support of the adoption of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area (PTA).

We recognize the cultural sensitivities and deep historic significance of the lands in question. It is crucial that stewardship of these lands reflects both the needs of our island's people and the values of respect, conservation, and cultural integrity. That said, we also want to highlight that the PTA has become a vital asset in our collective ability to respond to wildfire emergencies, and our experience over the past several years demonstrates just how essential this partnership has become.

During the 2021 Mana Road Fire, which threatened communities across Hawai‘i Island, the military assets based at PTA, especially air assets, played a decisive role in halting the fire’s spread. That partnership was once again critical in August 2023, when the Big Island faced multiple simultaneous wildfire incidents. The support provided by PTA enabled rapid air deployment, and dramatically increased the protection of Waikōloa Village, our homes, and our families.

It is no exaggeration to say that these efforts saved lives.

Beyond firefighting support, the continued Army presence at PTA also offers infrastructure and economic benefits. We understand that the Daniel K. Inouye Highway Extension, now moving through advanced planning stages, is expected to receive significant Department of Defense funding. This extension will directly improve emergency access and connectivity across the island, offering clear public safety and economic development benefits.

As such, WSAW supports the adoption of this EIS with two key recommendations for the State of Hawai‘i and this Board to consider:

1. Negotiate a Significantly More Equitable Lease Arrangement: The current lease, valued at just \$1, does not reflect the strategic value of the land or the burden carried by our communities. Future agreements must include meaningful compensation or investments



in local infrastructure, resilience, and stewardship, particularly for adjacent communities.

2. Leverage This Opportunity to Build Fire-Safe Infrastructure: Waikōloa Village has only one way in and out. This has been identified by multiple state and county reports as a critical safety vulnerability. We urge this Board and the Department of Land and Natural Resources to negotiate for specific contractual obligations that result in construction of additional egress routes, especially as part of any lease renewal or land retention agreement.

In closing, we express our appreciation to both the U.S. Army and DLNR for their efforts to balance cultural, environmental, and community concerns. We support the adoption of the EIS and believe that with strong state negotiation and oversight, this process can yield lasting benefits for the people of Hawai‘i Island.

Mahalo for your time and consideration.

Sincerely,  
Matt Chalker  
Executive Director  
Wildfire Safety Advocates of Waikōloa (WSAW)

**From:** [Darren Yamabe](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony to reject the US Army's EIS proposal to extend the lease at Pōhakuloa  
**Date:** Thursday, May 8, 2025 8:55:27 AM

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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**.

*My personal connections to this effort are that I, since birth, have resided in Hawai'i and have grown up in Honolulu; I currently work at Hālau Kū Māna Public Charter School; and there are many times when visiting Hawai'i mokupuni, that I have driven through the beautiful area of Pōkahuloa and falling in love with it's beauty mana. I strongly support the preservation of such a sacred place and our 'āina.*

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,

Darren Yamabe

No O‘ahu Mokupuni, Kona Moku, Pālolo Ahupua‘a, Leahi mai au



**From:** [Kristen Young](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for BLNR meeting 5/9/25 - Agenda Item D1  
**Date:** Thursday, May 8, 2025 8:42:41 AM

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

I am an O‘ahu resident and have had the privilege of growing up in Hawai‘i where one of the most important values and ways of life is **mālama ‘āina**—to care for, preserve, protect that which feeds us (whether physically or spiritually). My faith calls me to pursue peace, justice, and the renewal of all creation. For these simple reasons, I strongly oppose the U.S. Army’s proposed retention of leased lands at **Pōhakuloa Training Area**, and I urge this board to **reject the Army’s Final Environmental Impact Statement (FEIS)**.

Growing up, I did not really question the military and their presence on our islands. Surely an institution so large, respected in U.S. society, and well funded would be decent and responsible at the very least—or so I thought. I did not fully understand that their presence here is part of illegal U.S. occupation and imperialism and I was not connected enough to land or people to understand the devastating impacts on both. I somehow did not realize the military was using our home as a training area for war and testing grounds for weapons that inflict terror abroad after imposing damage here.

In a video by AJ+, “[How the Army Got to Bomb Hawaii for \\$1](https://youtu.be/-nsn4Sxy8r8?si=5M82TaOhR1xn-qhS&t=156)” (available on YouTube, <https://youtu.be/-nsn4Sxy8r8?si=5M82TaOhR1xn-qhS&t=156>), the interviewer comments to Lt. Col. Kevin Cronin, commander of the Pōhakuloa Training Area (PTA), “**It must be a big task to go in and clean all that up,**” referring to the bombs set off for practice. It is appropriate to assume that any good tenant, any decent person, would clean up a mess they made. The commander stutters a bit when responding that they don’t in fact clean anything up, but rather they let it be for “safety reasons”. We must question whose safety is the priority because it’s clearly not the land or its people.

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

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

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

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

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

After generations of desecration, we have a real opportunity for healing—not only of these sacred lands, but also people—and *this land board is the key*. Your decision will impact generations to come and can forge a path toward restoration and write a better chapter following decades of destruction. You have been put in these positions for such a time as this and I trust that you will fulfill your kuleana to protect Hawai‘i and its people.

Please use your position and the full extent of your power and authority to **reject the Army’s Final Environmental Impact Statement for Pōhakuloa**. This is the only option which will respect the land, the culture, and the people of Hawai‘i. It’s time to return these lands to Kānaka Maoli who we know can and intend to live in harmony with ‘āina.

Mahalo nui,  
Kristen Young  
Honolulu, Hawai‘i 96813

**From:** [luka zavas](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Agenda Item D-1 | Reject the FEIS  
**Date:** Thursday, May 8, 2025 8:47:38 AM

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

My name is Luka and I am from ‘Āhuimanu, O‘ahu. 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 impact 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,  
Luka Zavas

**From:** [Shay Zykova](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa  
**Date:** Thursday, May 8, 2025 8:33:45 AM

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Aloha,

My name is Shay Kaleooluhoiloliokawaipahe Zykova and I am writing to submit testimony asking BLNR to oppose and reject the Army's Environmental Impact Survey for continued use of Pohakuloa.

As a native Hawaiian and resident in the Red Hill area of Oahu, I have serious concerns on the Army's ability to care for any and all land under its care. One only needs to look to the Red Hill incident to see an example in recent history. I believe that it is irresponsible to allow the Army to use land in Hawaii that it has consistently failed to respect, maintain, clean-up, and care for. They have not fulfilled their duties as stewards to do the bare minimum, such as cleaning up after themselves, and us residents are the one who suffer.

The latest EIS shows how the Army continues to omit important findings on its impact on the land. I don't see the argument by the Army on its use of Pohakuloa persuasive and urge you to put residents first when making this important decision.

Mahalo,  
Shay Zykova

**From:** [Kawailele Chan \(2028\)](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, May 8, 2025 8:52:50 AM

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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.

Me ke Aloha,  
Drifton KuiFong Kawailele-O-Kawainui Chan  
**Halau Ku Mana**

**From:** [Kākāʻōlelo Māmalahoa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Chapter 2 of the Royal Order of Kamehameha 1. Agenda Item D1.  
**Date:** Thursday, May 8, 2025 8:48:54 AM

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**Royal Order of Kamehameha I**  
Heiau o Māmalahoa, Helu ‘Elua  
Moku o Hilo, Hāmākua, Ka‘ū  
P. O. Box 6878, Hilo, HI. 96720  
[mamalahoa.org](http://mamalahoa.org)

Aloha Land Board Members:

We, Heiau o Māmalahoa, Chapter 2 of the Royal Order of Kamehameha 1, are writing to express our 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:

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

We, Heiau o Māmalahoa, 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,

Ali'i Sir Kinohi P. Neves

Kākā'ōlelo o Māmalahoa (Talking Chief of Māmalahoa)

Heiau o Māmalahoa, Chapter 2 of the Royal Order of Kamehameha 1

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Mahalo for your cooperation.