

From: [Sheldon Abril](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Thursday, May 8, 2025 10:35:42 PM

Aloha Members of the Board of Land and Natural Resources,

As a lifelong resident of Hawai'i island and being born and raised 25 miles from Pōhakuloa, I strongly urge you to REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request

for the information, (2) deleting the section describing hazardous waste storage on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels". **V1 at 3-117** Yet there is no mitigation or

study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the "entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021." **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions ("GHGs") for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

a. The FEIS concedes ongoing impacts from past PTA operations - which the

Army proposes to continue indefinitely. **V1 at 4-11 - 4-25**

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

Submittal at 23

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

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

Mahalo for considering my testimony.

Ke aloha nui,
Sheldon Abril

From: [Christine Ahia](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa
Date: Friday, May 9, 2025 12:02:46 PM

Aloha,

I'm writing because I'm strongly opposed to the Army's proposed retention of leased lands at Pohakuloa Training Area, and I urge the land board to reject the Army's EIS.

Pohakuloa means so much to Native Hawaiians and Environmentalists. There are many culturally significant sites, and many of Hawai'i's endangered species are found there, yet the Army repeatedly fails to serve as a proper steward of these lands. And though the Army prepared an EIS, it falls short of addressing these concerns.

Almost every year the land is burned by fires set by the military, which includes critical habitat for native flora and fauna. To put it simply, many of us are tired of this continued desecration by the Army as it is not compatible with conservation, cultural integrity, or aloha 'aina. These activities need to be stopped. The state is also to blame for breaching its constitutional trust duties speaking up about this continuous destruction.

If the EIS is approved, it will contradict the BLNR's constitutional duty to inspect and ensure compliance with clean up and safety provisions. These are trust lands and they shouldn't be desecrated this way

I encourage the BLNR board members to respect the 'aina, the people of Hawai'i, and the culture by rejecting the Army's EIS for Pohakuloa. It is time for the lands to be restored and begin a real process of healing.

Mahalo,

Christine Ahia

Hilo

Sent from my iPad

From: [Wai"ala Ahn](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 8:12:26 AM

Aloha Members of the Board of Land and Natural Resources,

As a concerned citizen for health, safety, conservation, land/resource management, and cultural/religious practices and beliefs of our native Hawaiian Kanaka 'ōiwi rights; I ask BLNR to Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

As a kanaka 'ōiwi mother, lineal descendant and cultural practitioner of this land; the continued bombing, poisoning and utter disrespect for the cultural, ecological and health/safety immediately and long term for the land and its surrounding communities is devastating; and it's affects unknown. Look at the irreversible damage and heartache the bombing of Kaho'olawe has done to the land, water table, biology and people forcibly removed there. The damages are unsurmountable and irreversible; what is being done at Pōhakuloa is continuing horrific injustice, further feeding the machine of american imperialism; raping the land of native people to teach death, destruction and murder in other lands as it does so to our land and people here.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

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Mahalo for considering my testimony.

Wai'ala Ahn

From: [Kainoa Ahquin](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Friday, May 9, 2025 1:35:53 AM

To whom it concerns most,

I am writing to submit testimony against the renewal of lease agreement with the US military at Pōhakuloa. For decades the US military has disregarded proper stewardship practices and has purposefully bombed and desecrated our 'āina. As a resident of Waimea, all the way on the other side of the mauna, I can hear their bombing practices from my house. It hurts to know that every boom is an unnecessary hurt of our mauna. I urge you to think about our lāhui, the people of this place. Think about the abuse our land has already been through and please reject renewing the lease agreement. Rather let's allow for our kanaka maoli to utilize that space for cultural practices that will bring us closer to each other and our kūpuna.

Mahalo,
Kainoawaianuheia Ah Quin

From: [chellsie akau-elaban](#)
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 10:13:57 PM

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

1. Continued Desecration of Sacred Sites

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

2. Environmental Irreversibility

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

3. Illegitimacy of U.S. Military Occupation

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

4. Failure to Uphold the Public Trust Doctrine

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

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

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

Me ka 'oia'i'o,
Chellsie Alana'okalani Akau-Elaban
Wailuku, Maui
Kanaka Maoli
akauelaban@gmail.com
808-281-4947

From: [Kapena Alapai](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] K.G.Alapai Testimony Rejecting Army's Final EIS
Date: Friday, May 9, 2025 1:26:07 AM

E ka luna ho'okele BLNR,

My name is Kapena Alapa'i, my 'ohana is from Pu'uana'hulu, North Kona and I am the Vice President of Nā 'Ōiwi o Pu'uana'hulu. I have lived my entire life on this earth seeing Pōhakuloa occupied by military forces. I've seen the road moved, I've seen the air drills, heard the bombing and target practice, and I've seen the diesel army trucks go up and come down the mountain year after year. The terrain has changed so drastically in just my lifetime of 37 years.

This base sits just mauka of Pu'uana'hulu, meaning all the waste, toxic runoff, and other debris from the base and its activities have a direct effect on our Pu'uana'hulu community. Has the groundwater been cleaned? Can we use it to water crops on homestead lands? Does it not affect the waters off 'Anaeho'omalu and Kapalaoa?

This very board granted my 'ohana funds to secure 27 acres of ancestral homeland in 2024 at 'Anaeho'omalu and Kapalaoa. I wouldn't be doing my duty to protect those lands and those homesteads of my 'ohana just mauka of that if I did not testify and urge you all to deny the Army's Final EIS. The army has had this land long enough. Hawaiians believe in cycles to sustain life in these islands; we let places and food sources rest so they may regenerate and provide optimally again. We almost lost that practice but are reclaiming it with initiatives like Try Wait (Ka'ūpūlehu) or Miloli'i's ASPCA. We need to let the land rest and regenerate. Let Pōhakuloa alone, stop the destruction, the contamination, the human waste.

Please, I urge you on behalf of my 'ohana past present and future, do not accept the army's Final EIS. Do not renew the lease of Pōhakuloa.

Mahalo,
Kapena Alapa'i

Aloha, my name is Andrew Alling. I served in the U.S. Navy operating nuclear power plants aboard submarines for six years, so I'm familiar with military systems, technology, and strategy. I'm currently studying electrical engineering and have spent the past 18 months focused on UXO detection technologies.

According to Army SERDP/ESTCP Project MR-201227, *Demonstration of Advanced EMI Models for Live-Site UXO Discrimination at Waikoloa, Hawai'i*, only 50% of targets of interest were successfully detected using current state-of-the-art Advanced Geophysical Classification (AGC) systems. This poor performance is primarily due to two factors: (1) interference from natural magnetic soil signatures that create numerous false positives, and (2) the physical limitations of AGC systems, which are ineffective when the sensor is more than 30 cm (~11.8 inches) above the target—an issue exacerbated by the areas rugged, uneven, and rocky terrain. These systems weigh over 100 pounds, are 3 ft x 3 ft wide, and require 3-person teams to operate, making them impractical in many Hawaiian environments.

I had the opportunity to meet and speak directly with the scientists who designed and developed these AGC systems. These conversations deepened my understanding and confirmed that even the leading experts recognize the challenges of deploying this technology effectively in Hawai'i's unique geology.

Due to these findings, continued live fire training in Pohakuloa could result in **Permanent Environmental Impact** – The magnetic interference from the soil may render future remediation efforts ineffective, as UXO may remain undetected or become indistinguishable from background anomalies. Before any lease extension or EIS is considered, **verify** that the U.S. Army has the appropriate technology and resources to detect and remove UXO after training ends. The best proof of this would be visible progress in restoring other formerly used training sites such as the former WW2 training range Waikoloa Maneuver Area, which is right next door to Pohakuloa, to full and safe land use. Let's be clear: UXOs are still being found in Waikoloa, Waimānalo and Waianae **today**.

For the U.S. Army, I urge you to seriously weigh the poor efficiency, and extremely high cost of taxpayer dollars for UXO cleanup operations here in Hawaii. Live-fire training in volcanic magnetic soil environments—like those found across Hawai'i—makes UXO detection **orders of magnitude** more difficult, more time-consuming, and more expensive than in non-magnetic environments.

For the State, before any lease is renewed, consider this: Who truly benefits from it? Currently after military training is over, UXO detection and removal are done by out-of-state contractors, flown in at extremely high cost, with expensive equipment that needs to be **rented** for millions of dollars. The people of Hawai'i—those who live here, who care for this land—are left out. That must change.

It would benefit all parties to invest in **local training programs and technology development framework**, so Hawai'i's people have the power and tools to do this work themselves. Because when you're cleaning up your own backyard, **you do a better job**.



ESTCP Demo #	Site	Dataset	Efficiency at Stop-Dig Point	Rate At Stop-Dig Point	Rate with All TOI Classified	TOIs Incorrectly Classified
4	Fort Rucker, AL	MM	100%	45%	57%	0
5	New Boston AFS, NH	2x2 TEMTADS	100%	20%	44%	0
6	SWPG, AR	MM	100%	94%	96%	0
		2x2 TEMTADS	100%	92.5%	98%	0
7	WMA, HI	MM	98%	78%	51%	2
8	Andersen AFB, Guam	2x2 TEMTADS	100%	91%	92%	0
9	Castner Range, Ft. Bliss, TX	2x2 TEMTADS	100%	90%	94%	0
10	West Mesa, NM	MM	100%	87%	92%	0
11	Fort Ord, CA TOI-1	MM	100%	90%	94%	0
	Fort Ord, CA, TOI or 2	MM	99.25%	76%	47%	3

Color codes:

	Objective was met. All TOIs were classified as “Dig” at the Stop-Dig point while reducing false alarms by >75% of TOIs.
	Objective was NOT met. All TOIs were classified as “Dig” at the Stop-Dig point; however, due to the high ratio of the number of TOIs to the number of clutter items on the site, the classification was declared non-sufficient.
	Objective was NOT met. 98.6% of TOIs were classified as “Dig” at the Stop-Dig point. Missed classifications were due to the number of target and sensor-to-target separation distances.
	Objective was NOT met. There was insufficient data for the library item.
	Objective was NOT met. This was partially due to insufficient data quality, magnetic soil, and inaccurately documenting the intrusive results.

4.3.7 Waikoloa, HI

The former maneuver area is characterized by a generally smooth to rocky, sloping land surface of consistent grade, marked by numerous cinder cones along the volcanic rift zones that are now covered with grassland vegetation and cut by widely spaced erosional gullies. The WMA is surrounded by three of the five volcanoes that comprise the Island of Hawaii. On the north are the Kohala Mountains, the oldest volcanic feature on the island; on the east is Mauna Kea; and on the southwest are the Hualalai Cone and Crater. Coastal land bounds the former maneuver area from the south onto the west. The former WMA extends inland from near sea level to approximately 6,000 feet above mean sea level. Bedrock is at a depth approximately 10 to 40 inches below ground in most locations but deeper in the upper reaches of the maneuver area. The bedrocks and soils have high iron contents which forms the magnetic geology at the WMA. The soil's magnetic susceptibility, which varies spatially across the site, produced significant and variable background soil responses at Waikoloa and caused additional challenges to estimating targets parameters from advanced EMI sensors data sets.

8.0 COST ASSESSMENT

8.1 COST FOR CUED DATA SET PROCESSING AND CLASSIFICATIONS

Time and resources were tracked for each task to assess the cost of deploying the technology at future UXO Live Sites. Here we report the average time that an analyst spent processing and classifying cued data sets from three sites; Camp Beale, CA, Fort Sill, OK and Camp George West, CO. Costs associated with computer resources and run times are excluded. Note that some of the costs might be further decreased as the technology will be used in production setting and survey procedures become formalized. An average time and cost model of the resources spent during three Live Site anomalies classification using the advanced models is summarized in Table 7. These estimations are done for a geophysicist with salary of \$90/hr.

Table 7: Average Time and Cost Model for Processing Cued Data Set Using Advanced EMI Models

Cost Category	Description	Time (Minutes Per Anomaly)	Cost Per Anomaly
Preprocessing	Perform eigenvalue extraction, check data quality, and estimate the number of potential anomalies	0.5	\$0.75
Parameter extraction	Run code and extract target feature parameters	0.25	\$0.375
Classifier training	Optimize classifier design and train	0.25	\$0.375
Classification and construction of a ranked anomaly list	Classify anomalies in the test set and construct the ranked anomaly list	1	\$1.5
Reporting	Generate and document classification results and write reports.	1	\$1.5
Total		3	\$4.5

8.2 COST FOR DYNAMIC DATA SET PRE-PROCESSING, DATA INVERSION AND CLASSIFICATIONS

The dynamic data processing consists: background selection, background subtraction, data inversion, targets selection, classifier training, targets classification and construction of a prioritized dig list. Table 8 summarizes an average time spent Camp Hale, CO dynamic data processing and targets classification.

From: [Jurni Anderson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Friday, May 9, 2025 3:51:11 AM

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned ally to Kanaka Maoli and active 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,

Jurni Anderson-Thomas

Papaikou, Hawai‘i

Jurnianderson@gmail.com

From: [Ash](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the army's final EIS report
Date: Friday, May 9, 2025 5:15:37 AM

Aloha,

I am writing to urge you to reject the army's final EIS report. I grew up learning in school about how the army hurt Hawaii and harmed the lands. They didn't clean up their bombs and they lied about impact. Please reject their report and listen to the people of Hawaii.

Thank you,

Ash

‘Ano‘ai Ke Aloha Kākou,

I demand that the Board of Land and Natural Resources **not accept** the Final Environmental Impact Statement (EIS) for Pōhakuloa Training Area (PTA) for **item D.1**.

This is the continuation of a gross history of Hawai‘i and the United States. Where foreign boogeymen are excusable for the current and future ecocide that is committed in our homelands. I am opposed to the EIS for the following reasons:

- **No trustworthy mechanisms for enforcement** as the EIS are hedged with weak, discretionary language that are seemingly voluntary:
 - *“Where practicable...”* (Appendix E, p. E-5)
 - *“Avoidance... to the extent practicable.”* (Appendix E, p. E-4)
 - *“The Army may... consider adjusting...”* (Appendix E, p. E-5);
- **Limited analysis of alternatives**, the EIS has greater justification and detail of its retention plans rather than outlining commitments to environmental restoration upon return of lands to the State and public, failing to comply with legal responsibilities of NEPA;
- **Failure to address cumulative environmental impacts**; the EIS admits that NEPA documents have been lost over time or are not available, this does not allow a holistic assessment of cumulative degradation for the public and Board to consider; and
- **Continuation of war crimes** in assertion that the United States and the State of Hawai‘i have legal jurisdiction over lands that were never legally ceded from the Hawaiian Kingdom to said entities.

These outline a series of behaviors in which the United States Army, and all branches of the U.S. military fail to change: **1.) where publicly available information is limited for decision-making, 2.) No clear responsibility, process, and enforceability for the restoration of the environment; 3.) Avoidance of redress and addressing the legalities of an illegal military occupation in Hawai‘i.** The ignoring rather than ignorance of these issues, is unforgivable, and will continue to sever the relationship between the local community and the United States military.

I urge the Board, despite its lack of legal authority, but with what power it has vested to hold the U.S military accountable to at least better practice. The future of our children should be above jurisdiction and a sacred interest, one that the U.S military continues to violate, and will continue to do so unless it is held accountable.

I end with a quote from President John F. Kennedy “I speak of peace, therefore, as the necessary rational end of rational men. I realize that the pursuit of peace is not as dramatic as the pursuit of war — and frequently the words of the pursuer fall on deaf ears. But we have no more urgent task... First, examine our attitude toward peace itself. Too many of us think it is impossible. Too many think it is unreal. But that is a dangerous, defeatist belief. It leads to the conclusion that war is inevitable, that mankind is doomed, that we are gripped by forces we

cannot control. We need not accept that view. Our problems are manmade. Therefore, they can be solved by man. And man can be as big as he wants. No problem of human destiny is beyond human beings...Genuine peace must be the product of many nations, the sum of many acts. It must be dynamic, not static, changing to meet the challenge of each new generation. For peace is a process, a way of solving problems."

I therefore urge, with inspiration from a leader who called for peace at a time of seemingly inevitable destruction, that the Board of Land and Natural Resources do yet another cumulative act that drives forth genuine peace for our future generations. We cannot tolerate failure to alter behaviours that have long degraded our environment and deteriorate our society. Vote to not accept the Final EIS for PTA.

Mahalo,
Bronson Azama

From: [Tylor Bantilan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pakaula Testimony
Date: Friday, May 9, 2025 1:05:58 PM

Aloha Land Board Members:

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

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

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

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

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

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

Sincerely.

From: [Kaleihomai Bareng](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1" STOP the BOMBing! Reject the Army's FEIS
Date: Friday, May 9, 2025 12:55:49 AM

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

I am Donna Marie Kaleihomaimakealoha Bareng of 'Aiea, O'ahu.

I respectfully urge you to do what is pono and humbly ask for you to fulfill your kuleana to aloha 'āina and mālama our precious resources and hold the Army accountable for the hewa and wrongdoing to our 'āina by rejecting the Army's FEIS. The past sixty years of live fire training has already desecrated tens of thousands of acres, sacred sites, destroyed native and endangered species habitat and contaminated ecosystems with military debris, toxins, and heavy metals. 'A'ole Loa!!!

The ARMY's FEIS clearly:

- fails to account for the mishandling of cultural artifacts
- ignores impacts on federal lands
- lacks cultural and biological surveys to protect historic sites, and prevent extinctions
- downplays threats to native birds and wildlife
- fails to recognize that military training is not an acceptable use of the conservation district
- fails to acknowledge the deep harm that the desecration of 'āina inflicts on Native Hawaiians.

We call on you BLNR to uphold a standard of aloha 'aina and hold the ARMY accountable for the desecration and say NO MORE. Please reject the bogus FEIS from the Army.

Mahalo nui for your time and commitment to aloha 'āina,

From: [Life Of the Animal Horder](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Friday, May 9, 2025 8:34:06 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**. Hawaii is the Extinction Capital of the world, and the Military's bombing of the land is contributing to that title. 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,
River Barros
Wailuku, Maui

From: [Personal](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to reject the Army's EIS for Pohakuloa
Date: Friday, May 9, 2025 5:13:01 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

- a. The FEIS discloses significant lead and heavy metal contamination in PTA lands caused by live fire training. The Army's surface soil sampling detected the following in site soils: antimony, arsenic, cobalt, copper, iron, 1-methylnaphthalene, lead, manganese, naphthalene, selenium, silver, total petroleum hydrocarbons (TPH) as diesel range organics (DRO) and residual range organics, and zirconium. **V1 at 3-106**
- b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact when areas that are more likely to be affected

haven't been studied. **V1 at 3-193**

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

c. The Army said it will comply with the "Comprehensive Environmental Response, Compensation, and Liability

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

(3) Army is withholding information on accumulating contamination.

- a. In addition to the harm that has already occurred, how much worse will land contamination get with continued Army operations? What practices does the Army follow to prevent munitions contaminants from accumulating? The Army says it follows Standard Operating Procedures that are not available for public disclosure. **V2 at D-211** The EIS only gives a vague summary. **V2 at E-15 & E-16**
- b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.
- c. KAHEA asked about PTA’s hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous waste storage on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

- a. The state Department of Health (“DOH”) commented “There is no need for the Army to wait for the end of the lease period to address known and potential contamination under [federal laws]. Sites identified in the first and second Draft EIS documents . . . that are

on state land and no longer within currently active range locations should begin the cleanup process as soon as possible.” **V2 at D-223**

b. The Army flagged this comment as “not resolved”.

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

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

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

(6) Could contaminants have impacts on human health?

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

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

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

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

(7) Cumulative impacts of the entirety of PTA

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

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

Submittal at 23

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on

its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

Far from providing a comprehensive reference, the Army’s FEIS

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

Mahalo for considering my testimony.

Jeri Baumgardner

From: [Susan Bender](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 3:27:13 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

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

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

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

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

(2) Potential and means to restore these lands.

a. *Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it?* In response to these questions, the Army refers to FEIS section 3.5.6, which says “cleanup and restoration . . . are not part of the Proposed Action” and “future cleanup and restoration requirements, standard processes, and associated cost are unknown.” **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

b. The FEIS is inconsistent on this issue. It discloses there are

“potentially complete exposure pathways for human receptors from contaminants within the State-owned land surface soils” but because the same is not true for water and sediment, contaminants are “unlikely to impact public health.” **V1 at 3-107**

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

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

Mahalo for considering my testimony.

Susan L. Bender

Sent from my iPhone

From: [Anita Bhakta](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] BLNR Testimony
Date: Friday, May 9, 2025 7:25:02 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned supporter of 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,
Anita Bhakta
Kona, Hawai'i
Teacher at Hawaii Technology Academy
808-765-1817

From: [Pikachu Billionaire](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] testimony Opposing the Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area – Agenda Item: Decision Making Regarding the Acceptance or Non-Acceptance of the Final EIS
Date: Friday, May 9, 2025 8:47:13 AM

Subject: Testimony Opposing the Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area – Agenda Item: Decision Making Regarding the Acceptance or Non-Acceptance of the Final EIS

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

I write to vociferously denounce the acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area (PTA) on the Island of Hawai'i, as delineated in the agenda item concerning Tax Map Keys (3): 4-4-015:008, 4-4-016:005, and 7-1-004:007. Below, I present a meticulous excoriation of this egregious proposal, illuminating the U.S. Army's obstreperous folly and the DLNR's lamentable sycophancy in perpetuating a \$1 per year lease—a risible arrangement that bespeaks a nefarious dereliction of duty under the Trump administration's benighted oversight.

Purpose of Testimony:

I categorically oppose the U.S. Army's audacious scheme to retain 22,750 acres of sacrosanct state land at Pōhakuloa for a paltry \$1 per annum, a farcical relic of a 1964 agreement.

This proposal constitutes a calamitous endangerment of our revered 'āina, cultural patrimony, and ecological sanctity.

I beseech the BLNR to repudiate this EIS and thwart any lease renewal, as the Army's arguments are replete with mendacity, obfuscation, and a contumelious disregard for posterity.

Overview of Opposition

Irreconcilable Contravention of Conservation Ethos:

The Army's belligerent activities—live-fire exercises, bombing, and the handling of unexploded ordnance (UXO) and explosive ordnance disposal (EOD)—are anathema to the Conservation District's hallowed purpose.

Nestled amidst the triumvirate of Mauna Loa, Mauna Kea, and Hualālai, this subalpine dryland forest is a rara avis, a fragile ecosystem abutting an active volcanic crucible.

The region harbors imperiled species (nēnē goose, hoary bat) and venerated Native Hawaiian cultural loci, which the Army's actions imperil with reckless abandon.

Environmental and Cultural Peril:

The Army's operations disseminate pernicious toxins, engender prodigious UXO/EOD hazards, and precipitate environmental despoilment.

These actions jeopardize the delicate ecosystem and the ancestral heritage enshrined within.

Undermining Veracity:

The Army's ignominious failure to ameliorate impacts, coupled with the DLNR's fatuous acquiescence to a \$1 lease, renders the EIS a risible travesty, a mockery of due diligence.

Critical Weaknesses in the U.S. Army's Arguments

1. The \$1 Lease: A Profligate Undervaluation of Hallowed Land

The Army's pertinacious adherence to a \$1 per year lease for 22,750 acres is a scurrilous affront to the denizens of Hawai'i, a flagrant abrogation of fiduciary rectitude under the public trust doctrine.

This derisory fee, ossified since 1964, flouts the fair market value of the land—a fact the DLNR itself has conceded by advocating for an appraisal, yet cravenly fails to enforce.

The Army's supercilious assertion that this is a mere “real estate action” belies the land's inestimable cultural, ecological, and pecuniary worth, evincing a doltish insouciance.

Ceded lands, as erstwhile Hawaiian Kingdom crown lands, are a sacred trust for Native Hawaiians and the public—not a playground for the Army's pecuniary parsimony.

Under the Trump administration's obtuse aegis, the DLNR's acquiescence to this \$1 deal reveals a sycophantic obeisance to federal caprice, a betrayal of fiduciary honor.

2. Incongruity with Conservation District Precepts

The Office of Conservation and Coastal Lands has trenchantly averred that military training is antithetical to the Conservation District's mandate of safeguarding resources.

The Army's presumptuous conjecture that the BLNR will conjure a special subzone for their bellicose antics is a fatuous pipedream, as such an amendment is, by their own admission, “onerous.”

This specious assumption vitiates the EIS process, eschewing a bona fide appraisal of the no-action alternative—the paragon for preserving land, culture, and Hawaiian praxis.

The Army's recalcitrance in contemplating land relinquishment evinces a contumacious disregard for state land use edicts and the BLNR's sovereign purview.

The DLNR's willingness to entertain this charade under Trump's aegis bespeaks a lamentable pusillanimity, a dereliction of their custodial mandate.

3. Environmental Desolation and Toxic Profanation

The Army's depredations at PTA have wrought documented havoc, which the EIS mendaciously attenuates.

Historical use of uranium-based armaments (1960–1968) is conceded, yet the Army fatuously asserts no health peril from depleted uranium—a claim gainsaid by activists like Jim Albertini (Malu Aina Center), who decry the miasmic dust clouds disseminating toxins island-wide.

The EIS begrudgingly admits potential detriment to native species, water resources, and soil, yet proffers mitigation measures that are risibly inadequate.

Conflagrations ignited by PTA bombing have immolated tens of thousands of acres, extirpating endangered species habitats with wanton disregard.

UXO and EOD materials pose a perennial menace, and the Army’s historical dereliction in fulfilling cleanup obligations (per the Sierra Club Hawai‘i Island Group) underscores their ineptitude.

Moreover, despite my official adoption of the highway from mile markers 27 to 29 on the Daniel K. Inouye Highway for another three years—a commitment to mālama ‘āina alongside the Hawaii Cyber Lions Club—the Army has never once deigned to assist in cleanup efforts on Mauna Kea, particularly since the 2015 arrests of protectors opposing the Thirty Meter Telescope, leaving the people of the Hawaiian Islands to shoulder the burden of their detritus.

The DLNR’s acquiescence to this despoilment for a \$1 pittance under Trump’s regime evinces a craven complicity in environmental ruination.

4. Proximity to an Active Volcano: A Stupefying Oversight

The Army’s pertinacious insistence on bombing and live-fire training amidst active volcanoes—Mauna Loa, Mauna Kea, and Hualālai—is a paradigm of asinine recklessness.

Mauna Loa, with eruptions as recent as 2022, is a volcanic leviathan, yet the EIS obtusely elides the cataclysmic risks of such activities in this seismic crucible.

The potential for UXO, EOD materials, and toxins to commingle with volcanic phenomena (e.g., lava flows, ash dispersal) portends exacerbated contamination, imperiling communities far afield.

This lacuna in the EIS betrays a cretinous disregard for geological verities, a folly amplified by the DLNR’s witless tolerance of such arrant stupidity for a \$1 lease under Trump’s benighted stewardship.

5. Cultural Profanation and Obfuscation of Monumental Discoveries

The EIS concedes significant, deleterious impacts on cultural resources, yet the Army persists in a pattern of sacrilege and dissimulation.

In 2022, Pōhakuloa staff unearthed traditional Hawaiian funerary objects (moepū, wooden ki‘i) in a lava tube—a find the State Historic Preservation Division hailed as potentially epochal.

This discovery was ignominiously excised from the EIS at descendants’ behest due to its sanctity, depriving the BLNR of exigent data—a decision redolent of the Army’s obtuse opacity.

DLNR staff justly decried this elision, noting the Army’s failure to comprehensively survey cultural resources, a dereliction of due diligence.

Cultural practitioners (e.g., Maxine Kahaulelio) report profanations, such as the desecration of a lele

(altar) at Pu‘u Ke‘eke‘e during Makahiki, underscoring the Army’s callow disregard.

The DLNR’s supine acceptance of this obfuscation for a \$1 deal under Trump’s aegis evinces a deplorable abnegation of their custodial charge.

6. Historical Intransigence with Lease Stipulations

The Army’s record at PTA is a litany of contumelious non-compliance, as adjudicated by juridical edicts.

In 2019, the Hawaii Supreme Court upheld Native Hawaiian practitioners (Clarence “Ku” Ching, Mary Maxine Kahalelio), ruling the state failed to compel Army cleanup, thereby harming cultural interests.

The court admonished the state to actively preserve trust property, not permit its ruination—a precept the DLNR flouts with this \$1 travesty.

The lease mandates “every reasonable effort” to remove ammunition, yet the Army’s recalcitrance leaves UXO strewn about, a testament to their ineptitude.

The DLNR’s obsequious tolerance of this dereliction under Trump’s regime reveals a lamentable pusillanimity, a betrayal of their fiduciary onus.

7. Strategic Rationale: A Fatuous Pretext

The Army posits PTA as indispensable for military readiness, touting its status as Hawaii’s largest live-fire range, pivotal for Pacific stratagems (e.g., tensions with China).

This rationale is risibly specious:

Alternative Venues: The Army has not deigned to explore other loci (e.g., Alaska, other Pacific regions), preferring the facile expedient of despoiling Hawaiian land.

Ancillary Training: Use by law enforcement and first responders does not justify the cultural/ecological toll; less invasive venues could suffice.

Geopolitical Realities: Modern warfare increasingly favors technology, drones, and cyber tactics—not the antediluvian ground maneuvers necessitating this desecration.

The DLNR’s credulous acceptance of this pretext for a \$1 lease under Trump’s aegis evinces a doltish complicity in the Army’s myopic folly.

8. Public Health and Environmental Justice Imperilment

The EIS concedes deleterious environmental justice impacts, particularly for Native Hawaiian communities reliant on the land.

Toxins (depleted uranium, military chemicals) contaminate air, soil, and potentially the island’s largest aquifer, a dire threat to public weal.

Dust clouds from bombing create a pestilential miasma, imperiling residents, tourists, and ecosystems with a “toxic stew.”

The Army’s fatuous “no risk” claim for depleted uranium lacks independent corroboration, flouting community apprehensions.

The Red Hill debacle on O‘ahu—a military-induced water poisoning—epitomizes the Army’s execrable environmental stewardship, a legacy the DLNR abets with this \$1 farce under Trump.

9. Absence of Veritable Alternatives and Public Discourse

The EIS purports to evaluate alternatives (leasing 19,700 acres or no-action), yet the Army’s predilection for retention betrays a predetermined outcome.

The no-action alternative, championed by Native Hawaiian and environmental cohorts, would facilitate restoration and cultural reclamation—a path the Army disdainfully eschews.

Public fora in Hilo and Waimea evinced vociferous opposition, with testifiers (e.g., Craig Neff, Hawaiian Force) decrying aquifer contamination and Army-sparked conflagrations.

The Army’s claim of engaging Native Hawaiian organizations is a hollow shibboleth, belied by their obfuscation of cultural finds and history of desecration.

The DLNR’s complicity in this sham for a \$1 pittance under Trump’s regime bespeaks a craven abnegation of their public trust mandate.

10. Political Machinations and the “Woke” Canard

The Army’s negotiations are now tainted by President Trump’s Pentagon, helmed by Defense Secretary Pete Hegseth, who derides environmental/cultural programs as “woke” distractions.

This bellicose rhetoric portends a further evisceration of the Army’s already anemic mitigation commitments.

Army Secretary Dan Driscoll’s ostensible pledge to collaborate with Senator Mazie Hirono and community groups is a hollow sop, overshadowed by Hegseth’s militaristic zeal.

The DLNR’s willingness to entertain this charade for a \$1 lease under such a regime evinces a lamentable sycophancy, a betrayal of their fiduciary and cultural obligations.

Recommendations for the BLNR

Repudiate the Final EIS:

The EIS is a travesty, omitting exigent cultural discoveries and the perils of military activities in a volcanic crucible.

It presupposes a speculative subzone amendment, vitiating the process’s integrity.

Thwart Any Lease Renewal:

The Army’s intransigence, environmental despoilment, and cultural sacrilege render them unfit stewards.

The \$1 lease is a colonial anachronism that must be abrogated.

Embrace the No-Action Alternative:

Restoring the land to the state for cultural and ecological rejuvenation aligns with the Conservation District ethos and public trust doctrine.

This path facilitates the purgation of UXO, EOD materials, and toxins, revitalizing the area for Native Hawaiian praxis and conservation.

Exhort Independent Scrutiny:

Mandate independent, pellucid studies on toxins, aquifer impacts, and volcanic risks, ensuring community inclusion.

Heed Native Hawaiian Voices:

The vociferous opposition from Native Hawaiian practitioners, environmentalists, and residents must be honored.

The BLNR bears a juridical and moral onus to prioritize the weal of Hawai'i's people over military caprice.

Conclusion

The Army's Proposal: A Nefarious Legacy

This proposal perpetuates a colonial ignominy, profaning sacred lands, poisoning the ecosphere, and flouting Native Hawaiian rights.

The \$1 lease is a risible undervaluation of the land's cultural, ecological, and pecuniary worth.

The EIS is a mendacious screed, eliding the cataclysmic risks of bombing near active volcanoes, the scourge of UXO/EOD, and pervasive contamination.

The Army's Disqualification:

Their history of non-compliance (per the 2019 Hawaii Supreme Court ruling) and obfuscation of cultural resources renders them unfit tenants.

The DLNR's Complicity:

The DLNR's fatuous acceptance of this \$1 deal under Trump's benighted regime bespeaks a craven sycophancy, a betrayal of their custodial mandate.

Pōhakuloa's Sanctity:

Pōhakuloa is a wao akua, a divine realm where ancestral spirits abide—not a wasteland for military profligacy.

Exhortation to Action:

The BLNR bears a sacrosanct duty to mālama 'āina, safeguarding this land for posterity.

I implore you to repudiate the EIS, thwart the lease renewal, and restore Pōhakuloa to the people of Hawai'i for justice and redemption.

Mahalo for your consideration,

Master Shelby "Pikachu" Billionaire, HRM

Kingdom of The Hawaiian Islands, H.I.

Ohana Unity Party, Chairman

Adopter of Daniel K. Inouye Highway, Mile Markers 27–29 (2025–2028)

Hawaii Cyber Lions Club, Community Advocate

www.Ohanaunityparty.com

OhanaUnityChair@gmail.com (mailto:OhanaUnityChair@gmail.com)

From: [Stephan Boeker](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 7:37:46 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and

future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117**
Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

- a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?
- b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.” **V1 at 4-16** How can it reach this conclusion if it does not have data?

(10) Existing mitigation proven insufficient by ongoing impacts.

- a. The FEIS concedes ongoing impacts from past PTA operations - which the Army proposes to continue indefinitely. **V1 at 4-11 - 4-25**
- b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.
- c. For all other impacts, the Army will just continue existing mitigation measures. But these are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. **Submittal at 23**
- d. The FEIS excluded many lands from its survey of historic properties, including iwi kupuna, on state lands. **V1 at Fig. 3-8** How can the Army assess impacts to cultural resources if it does not even know if they are there?

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

unaccounted-for future scenario.

Mahalo for considering my testimony.

Stephan

From: [Al Braun](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Thursday, May 8, 2025 10:11:21 PM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." V1 at 3-122

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

incentivizes them to do so.

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

(3) Army is withholding information on accumulating contamination.

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

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b. The Army flagged this comment as “not resolved”.

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

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a. DHHL “feel[s] strongly” that the Army should do long-term air-quality and water-table testing at PTA. V2 at D-220 The Army declined, pointing to a one-year air quality monitoring program in 2007 that did not find levels outside standards and that the aquifer is very deep.

However, the Army admits there is a shallow aquifer that has not been tested despite recommendations to do so.

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. V1 at 3-117 Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” V2 at D-214

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. V1 at 3-220 As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

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

Mahalo for considering my testimony.

Albert Samuel Hiapo Braun

From: [Katherine Yvonne Mary Burke](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Friday, May 9, 2025 7:07:16 AM

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

My name is Katherine Burke and I respectfully urge you to do the right thing and reject the clearly insufficient FEIS in Item D-1. This FE/S disregards clear Hawaii 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 Pohakuloa. 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,
Katherine Burke
Kaneohe, HI

From: [PARKER CARLSON](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 5:12:20 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and

future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

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

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

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

unaccounted-for future scenario.

Mahalo for considering my testimony.

Parker Carlson

From: lenacarver@comcast.net
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pohakuloa
Date: Friday, May 9, 2025 6:32:23 AM

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Mahalo for considering my testimony.

Lena Carver

From: [Vincent Castaneto](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Friday, May 9, 2025 3:21:44 AM

Aloha Members of the Board of Land and Natural Resources,

My name is Vincent Keanu Revilla Castaneto 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,

Vincent KR Castaneto
Makawao, HI

Ho'ouna 'ia mai ka'u iPhone
Loa'a iā Outlook no iOS

From: [MONA CHING](#)
To: [DLNR, BLNR, Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to REJECT the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 9:36:31 AM

Subject : URGENT Matter, Calling on BLNR to REJECT the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa

Aloha Members of the Board of Land and Natural Resources,

Please, I kindly ask that you please "REJECT" the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

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193

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

Submittal at 23

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.”

V1 at 4-16 How can it reach this conclusion if it does not have data?

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

Submittal at 23

d. The FEIS excluded many lands from its survey of historic properties,

including iwi kupuna, on state lands. **V1 at Fig. 3-8** How can the Army assess impacts to cultural resources if it does not even know if they are there?

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

Mahalo for considering my testimony.

Mona Ching

May 9, 2025

From: [Kira Cho](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 11:12:53 PM

*Aloha e Chair Chang and Members of the Board of Land and Natural Resources,
My name is Kira Milika Cho 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,

Kira Milika Cho

From: [Clarisse Choy](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 9:39:15 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

- a. The FEIS discloses significant lead and heavy metal contamination in PTA lands caused by live fire training. The Army's surface soil sampling detected the following in site soils: antimony, arsenic, cobalt, copper, iron, 1-methylnaphthalene, lead, manganese, naphthalene, selenium, silver, total petroleum hydrocarbons (TPH) as diesel range organics (DRO) and residual range organics, and zirconium. V1 at 3-106
- b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact when areas that are more likely to be affected haven't been studied. V1 at 3-193
- c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not sampled all of its lands "to determine the presence or absence of munitions constituents." V2 at D-210
- d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

- a. Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." V1 at 3-122
- b. The existing leases only require: "Weapons and shells used in connection with training activities are to be removed to the extent that technical and economic capability exists and provided that expenditure for removal would not exceed the fair market value of the land." DEIS V.1 at 3-14 (emphasis added). Left unchallenged, the Army could simply say that it's too expensive to clean up and leave their mess behind – in fact, the inclusion of such language incentivizes them to do so.

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as “not resolved”.

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

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

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

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

b. The FEIS is inconsistent on this issue. It discloses there are “potentially complete exposure

pathways for human receptors from contaminants within the State-owned land surface soils” but because the same is not true for water and sediment, contaminants are “unlikely to impact public health.” V1 at 3-107

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are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. Submittal at 23

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

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

Mahalo for considering my testimony.

Clarisse Choy

From: [Tyler Converse](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa testimony
Date: Friday, May 9, 2025 7:47:04 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

1. Continued Desecration of Sacred Sites

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

2. Environmental Irreversibility

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

3. Illegitimacy of U.S. Military Occupation

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

4. Failure to Uphold the Public Trust Doctrine

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

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

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

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

Me ka 'ōia'i'o,
Tyler Converse
Honolulu, Oahu
Kanaka Maoli / Cultural Practitioner / Captain
8083139330

From: [Sierra Cooper](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Stop bombing Pohakuloa!
Date: Friday, May 9, 2025 6:33:45 AM

Bombing Pohakuloa poisons the land and desecrates important cultural sites. We have seen the damage that is caused by the Military in Kaho'olawe and Red Hill. It has gone on long enough. What benefit is it to Hawai'i and the people of Hawai'i? Stop exploiting the aina and do not extend the lease to the Military!

From: [Kristy Dalay](#)
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 10:13:20 PM

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

Me ka 'oia'i'o,

Kristy Dalay
Honolulu, O'ahu

From: [Susan Dickson-Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 1:32:40 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

I am a resident of Maine, living on unceded territory of the Penobscot Nation. I have loved and cared about Hawai'i since I visited the islands for five weeks at age 6, in 1981. The land, water, and cultural resources of this beautiful place are sacred and irreplaceable, and cannot be sacrificed to contamination from the Army's continued use of the PTA.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future

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

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

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

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

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

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

Mahalo for considering my testimony.

Susan Dickson-Smith

Orono, Maine

From: [Amanda Duran](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] POHAKULOA TESTIMONY
Date: Friday, May 9, 2025 9:23:25 AM

*Aloha e Chair Chang and Members of the Board of Land and Natural Resources,
My name is Amanda Duran 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,

Amanda Duran

From: [Patrick Easterling](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] pohakuloa
Date: Friday, May 9, 2025 1:52:06 PM

I am for stopping all military actions. I spent 18 months in Vietnam and this crazy addiction to war has to cease.

Mahalo, Patrick Easterling

Testimony in Opposition of the U.S. Army's EIS
REJECT US ARMY EIS!

Land Board Members,

I am writing to emphasize what is clear: the U.S. army's EIS is insufficient, inadequate, and should be REJECTED. Community and what should be state concerns go unaddressed, and what is addressed is done so poorly.

It is BLNR and DLNR's duty to mālama 'āina. To care for, to tend to, to love something is to fight for it. To ensure the safety of what you mālama, through advocacy and action. To accept this EIS is to fail at fulfilling this kuleana.

This EIS does not encompass all acres occupied by the army, majority of which DLNR has not put eyes on within the last three years, nor does it sufficiently address the cultural and environmental damage we clearly see, feel, and hold in our bodies every day. Contamination, desecration, and degradation of the land, water, and community connected to Pōhakuloa is encouraged when you, a board meant to uphold the values of DLNR, do nothing to call out the quality of this EIS.

REJECT THE U.S. ARMY'S EIS

- Lennie Espinoza
Wahiawa, HI

From: [cadencia_photography](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS
Date: Friday, May 9, 2025 8:28:58 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

these records?

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels". **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the "entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021." **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions ("GHGs") for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

Submittal at 23

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

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

Mahalo for considering my testimony,

Cadence Feeley

808-633-6968

<http://cadenciaweddings.com>

<http://cadenciaphotography.com>

[@cadencia](#) on instagram

[@cadenciaweddings](#) on instagram

From: [Dream Wealth-Ventures](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Friday, May 9, 2025 4:47:26 AM

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

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

Aloha e Chair Chang and Esteemed Committee Members,

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

I have learned all my life to take care of the land, and in turn, it will take care of us. It doesn't matter if you are on the same island or thousands of miles away; no matter where you are in the world, if you don't take care and be responsible for your actions, you do not belong there.

This reminds me of Kaho‘olawe all over again. Though it isn't the entire island, it is still affecting the surrounding areas. The same goes for Ka‘ula Island. Leave them all alone. Don't turn a blind eye just because it doesn't affect you directly.

Please do the pono thing, which is honoring the land and hearing the voices of those who mālama ‘āina and aloha ‘āina. After all, it is taking care of you.

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,

Ryan Kamakakēhau Fernandez
Honolulu, HI

Raised by Kanaka Maoli / Hawaiian Language Educator / Nā Hōkū Hanohano Awardee of
Traditional Hawaiian Music

Email: dreamwealthventures@gmail.com ↗ (mailto:dreamwealthventures@gmail.com)

From: [vincentflores321](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS
Date: Friday, May 9, 2025 4:08:31 AM

Aloha Members of the Board of Land and Natural Resources,

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

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a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says

“cleanup and restoration . . . are not part of the Proposed Action” and “future cleanup and restoration requirements, standard processes, and associated cost are unknown.” **V1 at 3-122**

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

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

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b. The Army flagged this comment as “not resolved”.

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

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

(8) Fire impacts are worse than disclosed.

- a. Between 1975 and August 2024, there were 1,261 fires of which 1007 fires were due to military activities. **V1 at 3-283.** Pōhakuloa is a TERRIBLE, fire prone place to do military training. Yet, the Army rejects proposals to relocate training - only mitigation for monitoring fires and inhibiting invasive grass growth.
- b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

- a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?
- b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.” **V1 at 4-16** How can it reach this conclusion if it does not have data?

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- a. The FEIS concedes ongoing impacts from past PTA operations - which the Army proposes to continue indefinitely. **V1 at 4-11 - 4-25**
- b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.
- c. For all other impacts, the Army will just continue existing mitigation measures. But these are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. **Submittal at 23**
- d. The FEIS excluded many lands from its survey of historic properties, including iwi kupuna, on state lands. **V1 at Fig. 3-8** How can the Army assess impacts to cultural resources if it does not even know if they are there?

Far from providing a comprehensive reference, the Army’s FEIS obstinately refuses

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

Mahalo for considering my testimony.
Vincent Flores

Sent from my Verizon, Samsung Galaxy smartphone

From: [May Fu](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 4:49:28 AM

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

Please **REJECT** the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

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(2) Potential and means to restore these lands.

(3) Army is withholding information on accumulating contamination.

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

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

(6) Could contaminants have impacts on human health?

(7) Cumulative impacts of the entirety of PTA.

(8) Fire impacts are worse than disclosed.

(9) No disclosure of greenhouse

(10) Existing mitigation proven insufficient by ongoing impacts.

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

Mahalo for considering my testimony.

May Fi

From: [Candace Fujikane](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for May 9th meeting, Item D-1: reject
Date: Friday, May 9, 2025 2:36:54 AM

Please accept my written testimony here on agenda item D-1. I will also be present to give my testimony in person.
Thank you!

TO: Members of the Board of Land and Natural Resources

FROM: Candace Fujikane, UH English Professor

RE: Testimony on Item D-1, urging the rejection of the U.S. Army's FEIS for Training Land Retention at Pōhakuloa Training Area

DATE: May 7, 2025

My name is Candace Fujikane, I am an English professor at the University of Hawai'i, and I teach courses on land struggles in Hawai'i. I urge the Board to reject the US Army's FEIS for Training Land Retention at Pōhakuloa Training Area. The FEIS is deeply flawed, and it attempts to hide its failures through rhetorical sleights of hand, claiming that events are "unlikely" to happen.

I am particularly concerned about the way that the FEIS is riddled with the language of illogical fallacies to minimize the fact that there are a number of tests that the Army has *failed* to do. For example, the FEIS makes conclusions based on its repeated word "**unlikely**," which is not a scientific conclusion but one based on **speculation**. The FEIS does provide an extensive list of highly hazardous materials that contaminate the soil, but concludes that there is "**a low likelihood**" to be carried off-site due to "the low rainfall in the area, lack of streams, and absence of a developed drainage system across the State-owned land." The problem is not so much that the contaminants will be carried offsite so much as an contaminants percolate through permeable soils to waters that we know flow under Pōhakuloa. The FEIS tries to argue that surface contamination is "**unlikely** to infiltrate to the underlying localized perched aquifer and the more regional, deeper, highlevel aquifer." The FEIS concludes that "surface soil contamination is **unlikely** to impact public health." I would not invest in any financial venture that states the "unlikelyhood" of an event, and I believe that the Board should not gamble away Hawai'i's water and future on assurances that contamination events are "unlikely."

A close reading of the FEIS shows us that the Army would have us believe that the aquifer showed no signs of contamination, but that they also failed *to test the actual groundwater from the perched aquifer*. The FEIS states, "A groundwater sample was not collected from the perched aquifer due to its slow recovery from being an unstable formation; however, there is reason to expect that the perched aquifer has somewhat better water quality." I do not trust anyone who makes an argument based on "there is reason to expect" that the water quality is better.

In the lawsuit, Ching v. Case, et al., the plaintiffs Kū Ching and Maxine Kaha‘ulelio charged the Department of Land and Natural Resources and the Board of Land Natural Resources with breaching their trust duties to protect and maintain public trust lands at Pōhakuloa. That case calls on the trustees to investigate and take necessary steps to ensure compliance with lease terms. The FEIS shows us the Army has not properly surveyed the land, and for that reason, the BLNR must reject the FEIS and have the Army do the surveying and testing that it has failed to do.

I have walked on the lands of Pōhakuloa with Kū Ching to honor heiau there. I want to say that I have personally seen the conditions on Pu‘u Ke‘eke‘e and Pu‘u Koli within the PTA. Those lands are incredibly beautiful, remembered in the mo‘olelo of Ka-Miki as a place of water. In that mo‘olelo, we learn that there are springs that spread down from Lake Waiau on Mauna a Wākea all the way across the plains of Pōhakuloa all the way to Hualalai. As earlier testimony have emphasized, it is the wai, the water of Pōhakuloa, that we must protect.

The BLNR has a responsibility to protect and maintain public trust lands. This FEIS fails to adequately address the safety of water, and for that reason, the BLNR must have the Army do a proper FEIS with all of the necessary testing.

Candace Fujikane
Professor of English
University of Hawai‘i

Author of Mapping Abundance for a Planetary Future: Kanaka Maoli and Critical Settler Cartographies in Hawai‘i (Duke University Press, 2021)



From: [Lori Glazebrook](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Acceptance of the Army's FEIS for Pōhakuloa Training Area
Date: Friday, May 9, 2025 8:41:09 AM

Aloha mai kākou,

As a resident of Hawai‘i, I strongly urge the Board of Land and Natural Resources to reject the Army’s Final Environmental Impact Statement (FEIS) for the lease renewal of nearly 23,000 acres at Pōhakuloa Training Area.

This document is deeply flawed and fails to uphold the standards of care our ‘āina and our communities deserve. It downplays the impacts of decades of bombing, contamination, and desecration. It ignores the true health risks to those who live, farm, and practice culture nearby. It fails to provide adequate testing for soil and groundwater, despite the known presence of lead, arsenic, and other hazardous materials. And it offers no credible, transparent plan for cleanup or accountability.

Let me be clear: this is not just a procedural decision. It is a moral one.

Approving this EIS would be a continuation of the same harm that has defined the military’s presence in Hawai‘i for generations. We do not need more incomplete studies, broken promises, or desecrated land. We need restoration. We need the state to uphold its fiduciary duty to protect public trust lands.

I urge you to:

- Reject the FEIS and require a full, lawful, and transparent review.
- Hold the Army accountable for past and present contamination.
- Begin the process of demilitarizing sacred ‘āina and returning it to Native Hawaiian stewardship.

Pōhakuloa is not expendable. It is not just training ground. It is sacred land that has already suffered enough.

Mahalo for your time and kuleana,

Lori Glazebrook, Puna District, Hawai‘i

Wishing you flow in the chaos of life,

Lori

From: [Li'i Goodhue](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Renewal of Lease for Pōhakuloa Training Area
Date: Friday, May 9, 2025 9:52:56 AM

Testimony Opposing the Renewal of Lease for Pōhakuloa Training Area

Introduction

Aloha mai kākou,

‘O wau ‘o Chelsey Goodhue, a he kupa au o ka 'āina o Kāne‘ohe ma ka moku o Ko‘olaupoko, ma ka mokupuni o O‘ahu. Eia au e noho nei ma ke ahupua‘a o Kea‘au ma ka moku o Puna ma ka mokupuni o Hawai‘i. I am submitting this testimony in strong opposition to the renewal of the lease for the Pōhakuloa Training Area (PTA) on Hawai‘i Island. This testimony reflects my deep concerns about the continued military use of these sacred lands and the impact it has on the environment, cultural resources, and the native Hawaiian community.

Cultural and Historical Significance

Pōhakuloa is a wahi pana (sacred place) with profound cultural and historical significance to the Native Hawaiian people. Located in the saddle region between Mauna Kea and Mauna Loa, this area contains numerous cultural sites, including heiau (temples), ahu (altars), burial sites, and traditional travel routes. These irreplaceable cultural resources have already suffered damage under military occupation, and further use would continue this desecration.

The area is central to Native Hawaiian creation stories and traditional practices. It represents a connection between earth and sky, a place where gods and ancestors are honored. The ongoing militarization of this sacred land represents a continued erasure of Hawaiian cultural heritage that began with the illegal overthrow of the Hawaiian Kingdom.

Environmental Concerns

The ecological importance of Pōhakuloa cannot be overstated. This area contains:

- Critical habitat for endangered species found nowhere else on Earth
- Unique dryland forest ecosystems
- Important watershed areas that affect the entire island
- Sensitive geological formations formed over millennia

Military training activities have introduced toxic chemicals, unexploded ordnance, and other pollutants into this fragile ecosystem. Despite promises of environmental stewardship, the military has repeatedly failed to adequately protect or restore lands under its control.

Legal and Procedural Concerns

The original lease agreements for PTA were executed without proper consultation with Native Hawaiian cultural practitioners or adequate environmental review. The U.S. military has repeatedly been found in breach of its lease obligations, as confirmed by a 2018 court ruling that found the State of Hawai‘i failed to properly monitor compliance with lease terms.

Additionally, the military has not completed comprehensive cultural or environmental impact studies that fully address the cumulative impacts of decades of military use. Without this information, an informed decision about lease renewal cannot be made.

Economic Concerns

While proponents of lease renewal often cite economic benefits, the reality is that the military occupation of Pōhakuloa:

- Restricts access to lands that could be used for sustainable tourism, agriculture, or cultural practices
- Causes environmental damage that will require costly remediation
- Provides limited employment opportunities compared to other potential land uses
- Diverts resources from more sustainable economic development initiatives

Health and Safety Concerns

Military training at Pōhakuloa poses ongoing risks to public health and safety, including:

- Air pollution from live-fire exercises and controlled burns
- Potential groundwater contamination from munitions and waste
- Risk from unexploded ordnance
- Noise pollution affecting surrounding communities

The military has not been transparent about the full extent of these impacts or provided adequate mitigation measures.

Alternatives

Rather than continuing military use, Pōhakuloa should be:

1. Returned to the State of Hawai‘i with full remediation of environmental damage
2. Protected as a cultural and natural preserve
3. Managed by or in partnership with Native Hawaiian organizations
4. Developed for sustainable, culturally appropriate uses that benefit the local community

Conclusion

The renewal of the lease for Pōhakuloa Training Area would perpetuate historical injustices against the Native Hawaiian people and continue environmental degradation of a unique and precious ecosystem. I strongly urge decision-makers to deny the lease renewal and begin

planning for the remediation and return of these lands.

The military has many alternative training locations, but Hawai‘i has only one Pōhakuloa. Once destroyed, the cultural and environmental resources of this area cannot be replaced.

Respectfully submitted,

Chelsey Keoholanikuali‘i Goodhue

From: [Jessica Haines](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 2:18:06 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." V1 at 3-122

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as “not resolved”.

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

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

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

(6) Could contaminants have impacts on human health?

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

recommendations to do so.

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. V1 at 3-117 Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” V2 at D-214

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and

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

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

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

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

Mahalo for considering my testimony.

From: [Ginger Hamilton](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony against the Army Training Land Retention at Pōhakuloa Training Area (agenda item D1)
Date: Friday, May 9, 2025 11:54:14 AM

Aloha Land and Natural Resources Board Members:

I am writing to voice my vehement opposition to the U.S. Army's proposed renewal of a 65 year lease/retention of leased lands at Pōhakuloa Training Area, and to ask the BLNR to reject the Army's EIS. As a life-time resident of Hawai'i and kanaka maoli, I understand that YOU are ALL entrusted to administer, protect and manage our public lands and oceans to ensure responsible stewardship of our valuable natural resources for current and future generations.

The Hawaiian people are very connected to the `āina. We understand the importance of mālama `āina; if we take care of the land it will, in turn, take care of us. Our health and well-being are tied to the land.

I think that we have had enough of the Military's desecration and disrespect of our `āina and this needs to stop! It is also reported that the State of Hawai'i has not fulfilled it's duty to monitor and inspect trust lands at Pōhakuloa to ensure compliance with cleanup and safety provisions in the lease and demanding timely action after learning of possible contamination or violations. Therefore the state is not capable of following through with their obligation to assure that protocols are being followed. "Red Hill" is an example of the military's lack of concern over the environment and the fragile eco-system of these islands, as well as the State's lack of oversight and failure to address problems in a timely manner.

Pōhakuloa is a wahi pana, a sacred place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. As a member of a halau hula, I have been to this area to pick `a`ali`i and other native plants to use for cultural purposes. 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.

There are many reasons that the lease to the military should not be renewed.

1. The military has **NOT** had a positive track record in our state when it comes to environmental consciousness, integrity, execution of projects, stewardship (which includes cleaning up their messes and restoring the land to pristine condition), and consulting and taking into consideration the concerns and mana`o of the indigenous people of Hawai'i, among other things. They need to be held accountable and amend the desecration of any lands, resources, and sites. Here are just a few example:

- On Jan 18, 2021 the EPA reported that "Hawaii's Military Bases Dumped 630,000 pounds of toxic nitrate in the Ocean. " 540,000 pounds came from Pearl Harbor-Hickam and 86,000 came from the

U.S. Marine Corps Base in Kane`ohe.

- The leaks from the Navy's 20 massive 20-story high underground fuel storage tanks dating to WWII in the Red Hill area above Pearl Harbor is egregious. More than 27,000 gallons leaked from a tank in 2014.

- The Military has conducted training in the sacred Makua Valley on O`ahu which has resulted in damages of over 100 cultural sites and has prevented access to Kanaka Maoli into the area.

- The Army Stryker brigades demolished habitat near Schofield Barracks on O`ahu as well as the Pōhakuloa training area on Hawai`i Island.

- The use of the island of Kaho`olawe as a bombing site for decades (from 1941 till 1990) until it was finally returned to the state in 2004, after many years of protests. However, the military has still not cleaned it up!!! The island and surrounding waters are still littered with unexploded ordnances. The Navy has an obligation to finish clearing Kaho`olawe and all sites that it has left impaired.

- According to Civil Beat (10-22-2014), there are 33 former defense sites which still need to be cleaned up by the Military.

- From 1964-1978, 2,189 steel drums of radioactive waste were dumped 55 miles off O`ahu and 4,843,000 gallons of radioactive waste liquid was discharged into Pearl Harbor.

- From 1953 to 1976 the Marine Corps used Waiahole and Waikane Valleys (187 acres) as a training site and there still remains risks from munitions and explosives discarded by the Military that may be harmful. This has affected access by farmers and others into this area.

- In 1944 and 1945, tons of toxics & hydrogen cyanide was dumped about 5 miles off Pearl Harbor.

- The noise levels of Military helicopters flying over residential areas all day and even late into the night on O`ahu are excruciating. It causes the whole house to shake which I'm sure is doing damage to the house's foundations after repeated flyovers, not to mention the effects to people's health due to disruption of sleep, possible anxiety, high blood pressure, and hearing loss. This lack of consideration for the impact on the residents shows they have no respect for the residents of Hawai`i.

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

3. 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.

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

5. 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, Ginger Hamilton, from Moku o Keawe

From: [Lahilahi Heen](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Thursday, May 8, 2025 10:38:42 PM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

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- b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.
- c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous waste storage on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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- b. The Army flagged this comment as "not resolved".

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sampling groundwater in shallower aquifers; and no one has done this sampling or analysis. **V1 at 3-193**

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

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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cumulative impacts of these operations? How does PTA as a whole impact Hawai'i's economy? Housing availability? Native species supposedly "habituated" to the sound of military training and potentially exposed to munitions contaminants?

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

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

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

Mahalo for considering my testimony.

Lahilahi

From: [Pua Heimuli](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please reject the Army's EIS
Date: Friday, May 9, 2025 7:24:56 AM

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

My name is Pua Heimuli, a resident of O‘ahu whose kulāiwi is of Kohala, Hawai‘i, not far from Pōhakuloa. I am writing to respectfully and strongly urge you to reject the Final Environmental Impact Statement (FEIS) presented in Agenda Item D-1, as it is demonstrably insufficient and legally deficient.

As repeatedly highlighted by DLNR staff in the submittal, this FEIS exhibits a profound disregard for established Hawai‘i law. The U.S. Army is not exempt from adherence to our legal framework, yet this document fails to address fundamental legal requirements. Specifically, it omits critical analysis of environmental and cultural impacts occurring on federal lands and lacks essential surveys necessary for an objective and comprehensive assessment of the proposed Army "retention" of ‘āina in Pōhakuloa.

It is imperative that this Board upholds its sworn duty to protect Hawai‘i's natural and cultural resources and to uphold the rule of law. Approving an incomplete and unlawful document undermines the very mission of this Board.

Therefore, I respectfully but firmly urge you to REJECT the FEIS submitted under Agenda Item D-1.

Mahalo nui for your time and for the opportunity to provide testimony on this vital matter.

Aloha,

Pua Heimuli
(808)230-7296

From: [Joan Heller](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 6:55:17 AM

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

b. The Army flagged this comment as "not resolved".

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

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

b. The FEIS is inconsistent on this issue. It discloses there are

“potentially complete exposure pathways for human receptors from contaminants within the State-owned land surface soils” but because the same is not true for water and sediment, contaminants are “unlikely to impact public health.” **V1 at 3-107**

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

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(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

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

Mahalo for considering my testimony.

Joan Heller

3820 Uakea Place, Lawai, HI 96765

From: [Malcolm and Kapua Helm](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 12:14:06 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the

soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not sampled all of its lands "to determine the presence or absence of munitions constituents." V2 at D-210

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." V1 at 3-122

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

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

b. The Army flagged this comment as "not resolved".

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Army know either way?

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

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- a. DHHL "feel[s] strongly" that the Army should do long-term air-quality and water-table testing at PTA. V2 at D-220 The Army declined, pointing to a one-year air quality monitoring program in 2007 that did not find levels outside standards and that the aquifer is very deep. However, the Army admits there is a shallow aquifer that has not been tested despite recommendations to do so.
- b. The FEIS is inconsistent on this issue. It discloses there are "potentially complete exposure pathways for human receptors from contaminants within the State-owned land surface soils" but because the same is not true for water and sediment, contaminants are "unlikely to impact public health." V1 at 3-107
- c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels". V1 at 3-117 Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

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

(8) Fire impacts are worse than disclosed.

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

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

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

scenario.

Make no mistake, military preparedness is about killing, not about life. The life of our land and people lay in your hands. I am confident you will choose life.

Mahalo,

Kapua Helm

From: [Linnea Heu](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT the Army's FEIS for Pōhakuloa
Date: Friday, May 9, 2025 1:55:00 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

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

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

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Submittal at 23

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Mahalo for considering my testimony.

Linnea I. Heu

Hilo, Hawai'i

From: [Jennifer Ho](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Oppose POHAKULOA lease extension
Date: Friday, May 9, 2025 8:10:56 AM

I am opposed to extending the lease allowing the military to hold training or exercises anywhere in Hawaii, especially at Pohakuloa. America has not found a way to use humane solutions to international problem. Exercises for and acts of war pollute the land and endanger our own peoples. We do not want our tax dollars used to prepare for or engage in acts of war against other

Many American presidents have been against involvement in the affairs of other nations, and when we have been led into foreign wars it has been to benefit oil industry or other political agendas that have nothing NOTHING to do with the actual safety of our country. I was going to say beautiful country, but as our military pollutes our country, making water unfit to drink, land unfit for agriculture, and by rerouting our taxes to support militarism, we deplete our coffers and do not employ our citizens in repairing infrastructure .

If the military was reconfigured to use its organizational skills to evacuate after disasters, or remove invasive species damaging fresh or coastal waters I am in support of having a response to crisis and problem team that the military could become. Warnis not a solution. Pohakuloa (and Red Hill on Oahu) are sources of deadly contaminates for not just persons there, but surrounding areas. Military solutions are problems
Sincerely Jennifer Ho

From: [Makanoe Hufana](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Opposition to the U.S. Army's Final Environmental Impact Statement (FEIS) for Pōhakuloa Training Area (PTA)
Date: Friday, May 9, 2025 8:43:04 AM

Aloha Chair Chang and Esteemed Members of the Board,

I am writing to express my strong opposition to the U.S. Army's Final Environmental Impact Statement (FEIS) concerning the renewal of leases on approximately 23,000 acres of state land at the Pōhakuloa Training Area (PTA) on Hawai'i Island.

Omission of Significant Cultural Findings:

Recent investigations have revealed that the Army failed to disclose the discovery of significant Native Hawaiian burial artifacts—moepū (funerary objects), including wooden ki'i—found in a lava tube at PTA in 2022. The State Historic Preservation Division identified this as “one of the most significant finds in the last 100 years”. The Army's exclusion of this discovery from the FEIS raises serious concerns about transparency and respect for cultural heritage.

Environmental and Cultural Impact:

PTA encompasses lands between Mauna Kea, Mauna Loa, and Hualālai, areas rich in ecological diversity and cultural significance. Continued military training activities pose risks to endangered species and sacred sites. The Army's preferred alternative to lease nearly 20,000 acres fails to adequately address these concerns .

Given these considerations, I urge the BLNR to:

1. **Reject the Army's FEIS:** The document fails to meet the requirements of Hawai'i's environmental review laws and does not adequately address the cultural, environmental, and community impacts of continued military use of these lands.
2. **Honor the 2029 Lease Expiration:** Allow the current leases to expire without renewal, returning the land to the stewardship of the Hawaiian people.
3. **Conduct a Comprehensive Cultural and Environmental Assessment** upon the military exiting the grounds in 2029, Prior to any future decisions, ensure a thorough evaluation of the land's cultural sites and ecological systems, with full participation from Native Hawaiian communities.

Mahalo for your consideration.

Respectfully,

Makanoe Hufana

Preservation Project Coordinator

Member of Hui Aloha 'Āina

Member of Ka Lāhui Hawai'i

Burial Practitioner and Historian with a focus on Pacific Burial traditions

Concerned member of the community who went to school for their degree at UH Hilo.

makanoehufana@gmail.com

From: [Ramona Hussey](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [Jim Albertini](#); [Laulani Teale](#); [Bob Stauffer](#); [dave mulinix](#); [Susan Roberts Emery](#); [Jeff Turner](#)
Subject: [EXTERNAL] Cancel the military lease to Pohakuloa
Date: Friday, May 9, 2025 5:30:12 AM

I am urging you to cancel any extension of the lease at Pohakuloa (on the Big Island of Hawai'i).

This is CONSERVATION land! How is it acceptable to allow the military to conduct war operations on conservation land? The soil has been contaminated. The environment degraded. Animals endangered. People potentially poisoned with Depleted Uranium.

This wrong has continued for too many years. It must stop now.

Please notify me of the results of today's hearing, as I am off-island and cannot attend the hearing.

Thank you,
Ramona Hussey

--

Ramona Hussey
ramona.hussey@gmail.com
(808) 437-6428
PO Box 433
Hilo, HI 96721

From: [Ikaika](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 4:12:06 AM

Members of the Board of Land and Natural Resources,

REJECT the army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

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d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued army operations?

(2) Potential and means to restore these lands.

a. Can the army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

c. KAHEA asked about PTA's hazardous waste spill risks. The army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous

waste storage on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

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

b. The army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

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

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

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the army should have done these studies as part of this EIS - not afterwards.

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

Submittal at 23

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

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

And:

Ola i ka wai. Water is life. And the military, army in this case, has had control for too long over these finite sources of water on our pae 'āina. Hewa "stewards." Arrogant haole. The least they can do for Pōhakuloa is conduct the necessary investigations, and clean up all the rubbish they've made; the rubbish that is the contaminants in the grounds, waters, and airs of Pōhakuloa— and all their equipment and soldiers for that matter. Pōhakuloa, just like Kaho'olawe, just like any other part of our pae 'āina, and just like any other part of our earth, is not for military training. Period.

Mahalo.

Ikaikaonalani James

From: [Candi Hololio Johnson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at P
ōhakuloa
Date: Friday, May 9, 2025 6:48:55 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board MUST require the US Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

- a. The FEIS discloses significant lead and heavy metal contamination in PTA lands caused by live fire training. The Army's surface soil sampling detected the following in site soils: antimony, arsenic, cobalt, copper, iron, 1-methylnaphthalene, lead, manganese, naphthalene, selenium, silver, total petroleum hydrocarbons (TPH) as diesel range organics (DRO) and residual range organics, and zirconium. V1 at 3-106
- b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact when areas that are more likely to be affected haven't been studied. V1 at 3-193
- c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not sampled all of its lands "to determine the presence or absence of munitions constituents." V2 at D-210
- d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

- a. Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." V1 at 3-122
- b. The existing leases only require: "Weapons and shells used in

connection with training activities are to be removed to the extent that technical and economic capability exists and provided that expenditure for removal would not exceed the fair market value of the land.” DEIS V.1 at 3-14 (emphasis added). Left unchallenged, the Army could simply say that it’s too expensive to clean up and leave their mess behind – in fact, the inclusion of such language incentivizes them to do so.

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as “not resolved”.

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. V1 at 3-117 Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” V2 at D-214

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate

change.” V1 at 4-16 How can it reach this conclusion if it does not have data?

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. V1 at 3-220 As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

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

Mahalo for considering my testimony.

Candi Hololio Johnson

From: [Izzy Krompegel-Anliker](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Friday, May 9, 2025 5:46:02 AM

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

My name is Isabella Ka 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.

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

*Sincerely,
Isabella Ka*

From: [Kawika Maui Kalama](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in Opposition to U.S. Army's Final EIS for Pohakuloa Training Area
Date: Friday, May 9, 2025 5:46:22 AM

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

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

Environmental Concerns

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

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

Cultural Impacts and Legal Obligations

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

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

Reasonable Alternatives

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

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

Conclusion

I respectfully ask the BLNR to:

Reject the Army's FEIS as inadequate and inconsistent with the land's conservation designation

Require complete removal of unexploded ordnance and environmental remediation of the leased lands

Fulfill the state's obligations as trustee by prioritizing environmental protection and cultural interests over military use

Pursue the "no action" alternative, which would best serve the land's long-term protection

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

Me ka ha'aha'a,

Kawika Kalama

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,
Eddie Kalamau III
Ewa Beach, Oahu
Kanaka Maoli
Ekalamau45@gmail.com
Telephone 5037059920

From: [Pua Kamahoahoa](#)
To: [DLNR, BLNR, Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Friday, May 9, 2025 7:40:12 AM
Attachments: [image999196.png](#)
[image343958.png](#)
[image365644.png](#)
[image953831.png](#)
[image712911.png](#)
[image507495.png](#)

Aloha e Chair Chang & Members of Land and Natural Resources

My name is Pualeilani Kamahoahoa.

I am of Kanaka Hawai'i ancestry and raised in Ka'u , Hawai'i.

I am testifying to respectfully urge you to do the right thing, and reject the 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 the 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 'aina at Pohakuloa - 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 for the opportunity to testify.

Ke aloha nui,

Pualeilani Kamahoahoa



Pua Kamahoahoa | Member Services Associate

1040 Richards St
Honolulu HI 96813

✉ pkamahoahoa@ywcaoahu.org



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48th Annual
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From: [Sherri Kamaka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Friday, May 9, 2025 8:06:52 AM

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

My name is Sherri Kamaka and I am kanaka 'ōiwi; No Moku o Keawe ko'u 'ohana. 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.

Ike pono. The military are illegally occupying the Kingdom of Hawai'i. They are not existing by our state motto and we should not allow them to do that. If we allow them to do that it is hypocritical.

Mālama pono,

Sherri Kamaka

From: [kimeona.kane](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for item D.1
Date: Friday, May 9, 2025 12:13:15 AM

Aloha,

Please accept my testimony to deny the following item and rule non acceptance.

D. LAND DIVISION

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.

It is my heartfelt position that we must move the US military out of Pōhakuloa and begin to reclaim lands being desecrated in the interest of US Military readiness.

Reject the EIS and lets start the healing process.

‘O wau nō me ka ha‘aha‘a a me ka mahalo,

Kimeona Kane (he/him)

808 398 8989

kimeonakane@gmail.com

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From: [Makaiwa Kanui](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's EIS
Date: Friday, May 9, 2025 11:21:05 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 a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. Pōhakuloa is kupuna. We have stories of Pōhakuloa as kupuna, as Akua, as a wahi kapu. How is the military qualified to steward this sacred place righteously? 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,
Makaiwa Kanui
Mauna Hu'ihu'i, 'Ōla'a

From: [Pulehunui Hawaiian Homestead Association](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Friday, May 9, 2025 8:57:36 AM

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

My name is Robin Kealiinohomoku, President of Pūlehunui Hawaiian Homelands on the island of Maui and I am kanaka 'ōiwi no Maui ko'u 'ohana. 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.

Ike pono. The military is illegally occupying the Kingdom of Hawai'i. This negligent practice does not align with our state motto and we will not allow them to continue to abuse and conduct any activity upon our land. Allowing desecration by any foreign entity on our land is a practice of malfeasance and will not be tolerated by kanaka 'ōiwi.

Mālama pono,

Robin Leihuanani Kealiinohomoku

From: [Mainei Kinimaka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 6:09:07 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much

worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated,

despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

b. The FEIS is inconsistent on this issue. It discloses there are "potentially complete exposure pathways for human receptors from

contaminants within the State-owned land surface soils” but because the same is not true for water and sediment, contaminants are “unlikely to impact public health.” **V1 at 3-107**

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas

emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

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

Mahalo for considering my testimony.

Mainei Kinimaka

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Mainei Kinimaka

On The Roam Productions

Assistant & Producer

e. maineialoha@gmail.com

p. 808.755-5556

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From: [Jordain K](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 8:50:38 AM

To Members of the Board of Land and Natural Resources,
Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions. The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

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- b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact when areas that are more likely to be affected haven't been studied. **V1 at 3-193**
- c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not sampled all of its lands "to determine the presence or absence of munitions constituents." **V2 at D-210**
- d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

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- b. The existing leases only require: "Weapons and shells used in connection with training activities are to be removed to the extent that

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However, the Army admits there is a shallow aquifer that has not been tested despite recommendations to do so.

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

Mahalo for considering my testimony.

Jordain Kirk (Na'alehu resident)

From: [Tatsuki kohatsu](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please Reject the Army's Final Environmental Impact Statement
Date: Thursday, May 8, 2025 10:17:42 PM

Dear Board of Land and Natural Resources,

My name is Tatsuki Kohatsu. I am writing to ask the Board to reject the Army's Final Environmental Impact Statement. The EIS is inadequate in addressing the environmental and cultural impacts to the area. Pōhakuloa is a sacred and storied place, home to Native Hawaiian cultural sites and some of Hawai'i's most endangered species. The Army has continuously failed to demonstrate the capacity to serve as a proper steward of this land.

Best regards,
Tatsuki Kohatsu

From: [Linda](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony PTA No new land lease
Date: Friday, May 9, 2025 6:20:33 AM

DO NOT RENEW LAND LEASE FOR POHAKULOA TRAINING AREA.

Submitted Testimony

Agenda item D1

Aloha BLNR Land Board

For 15 years I volunteered as a military toxic educator. And found in my research of reading the 2004 military EIS was full of misinformation and lies; discovered in a 2005 Freedom of information Act (FOIA) which proved that the military had lied about the contamination radioactive munitions such as spotting rounds of depleted uranium in Hawaii.

The military here are absolutely the worst polluter in these islands without taking any accountability, responsibility for the pollution that they create; through adequate air testing and adequate clean up.

BLNR was sued in 2018 for not following its fiduciary duties in protecting these trust lands The Supreme Court ruled, "BLNR failed to Malama the 'Āina."

The Military, the State of Hawaii Health Department as well as BLNR have totally ignored the life threatening health risks to our communities down wind by the military re-exploding an already contaminated depleted uranium firing range.

The military and the State of Hawaii Health department both have websites about depleted uranium contamination, as a knee jerk reaction to the 2005 FOIA. Both are nearly identical using only half science and both ignoring the science of **dust migration of toxic particles carried on almost constant winds of 20 to 30 miles per hour off the Pōhakuloa live-fire training ranges.**

DU Oxide dust is the most dangerous form of radiation poisoning if these microscopic dust particles are inhaled.

In 2017 I filmed Dr Lorrin Pang (Speaking in his private capacity) discusses the differences between Depleted Uranium vs Depleted Uranium Oxides and the health hazards of DU Oxides if inhaled. Please take the time to view this 30 minute video to understand the serious health hazards to our communities downwind from military live-fire training on our precious island.

DU vs DU OXIDE by Dr Lorrin Pang

Worked off and on with this Princeton graduate and x-military doctor about topics like informed consent and military toxics. (About 30 minutes long)

<https://rumble.com/v62kijk-du-vs-du-oxide-dr-pang.html>

Don't have 30 minutes? Here are excerpts of the above film (9 minutes 51 seconds long.)

CANCEL PTA LAND LEASE

Dr Lorrin Pang (speaking in his private capacity) thoroughly explains the serious health risks of Depleted Uranium Oxides/dust particles blowing in the wind as it relates to the Military Live Fire Training at Pōhakuloa Training Area (PTA) on Hawaii Island.

<https://rumble.com/v6szy2n-cancel-pta-land-lease.html>

The Military has never done adequate clean up or air testing around Pōhakuloa Training Area.

CANCEL THE LAND LEASE TO THE MILITARY AT POHAKULOA TRAINING AREA

Sincerely,

Linda Kroll RN BSN

Mt View Hawaii

P.O.Box 748

Keaau, HI

lindafayenaturallaw@gmail.com

C.C.

Pōhakuloa Training Area (PTA) Commander

LTC Tim Alvarado

P.O.Box 4607, Hilo HI 96720

And to:

Amy Phillips PTA PAO

To delivery to: LTC Tim Alvarado

From: [Klayton Kubo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D1
Date: Friday, May 9, 2025 7:34:15 AM

Did the military do everything that they needed to do in the EIS? If not how can the EIS be accepted?

Klayton Kubo
Waimea, Kaua'i

From: [Kukuipuka](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Friday, May 9, 2025 8:10:19 AM

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

My name is Maydeen 'Īao 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 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 continue to inflict with its "retention" proposal, including to the Native Hawaiian community.

Mahalo nui for the opportunity to testify.

*Aloha nui,
Maydeen Ku'uipo 'Īao*

From: [Adriel Lam](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [MIS Veterans Post 110 VFW](#)
Subject: [EXTERNAL] Testimony in support of continued use of Pohakuloa Training Area for the U.S. Army, Board of Land and Natural Resources Hearing, May 9, 2025
Date: Friday, May 9, 2025 7:14:16 AM
Attachments: [image001.png](#)
[image003.png](#)

Aloha Chair Dawn Chang and Members of the Board,

On behalf of the Veterans of Foreign Wars Post 110 MIS Veterans of Hawaii, I write in strong support of continued use of Pohakuloa Training Area by the US Army.

At VFW110 MIS Veterans of Hawaii, we preserve the legacy of the Nisei generation who served valiantly and courageously throughout the campaign of the War in the Pacific. Many gave their lives in that conflict, many others returned and continued to quietly serve in their communities, despite the horrors of the battlefield they witnessed. We honor and preserve their memory for other veterans like myself that walked similar paths.

Since Western contact, Hawaii has always been the strategic center of the Pacific. Global powers have vied for interests and influence in the Hawaiian Islands, and none more apparent than the military attack on Pearl Harbor on December 7, 1941. For decades through the late 19th and early 20th century, military strategists predicted the inevitable conflict that led to that fateful day. The same strategic dynamic exists were it not for the supreme dominance of the United States military in the Pacific for the past 80 years. While global interests continue to seek and gain influence in the Hawaiian Islands, it is the presence of this premiere fighting force in the world that maintains peace in the Pacific and keeps these islands devoid of military conflict.

The Pohakuloa Training Area is vital and essential to the US Army in maintaining peace in the Pacific. It is here at PTA that veterans like myself and my predecessors in past conflicts have trained and honed our skills as warriors to face any task and any environment we were called upon to protect our homes from threats from afar. There is no other place that secures the peace that we currently enjoy on these islands.

I strongly urge the Board to vote in favor of continued use of Pohakuloa Training Area by the United States Army.

Aloha,
Adriel C. Lam
Post Commander
VFW 110 MIS Veterans of Hawaii

From: [Lilli Leihua Leong](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Friday, May 9, 2025 1:34:47 PM

Aloha,

My name is Lilli Leong and I am kupuna from Maui. I understand that the army needs to practice using their weapons. However, there are many locations on the continent where that can happen. Hawai'i does not need to be included in weapon practice. It's time to clean up Hawaiian land and return it to the Hawaiians.

Mahalo,

Lilli Leong

From: [Kalyn Lepre](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony item D-1
Date: Friday, May 9, 2025 11:30:55 AM

I'd like to add my name, Kalyn Lepre, to the list of people who would like to protect Pohakaloa from continued damage. DLNR staff themselves have pointed out that this FEIS does not meet legal requirements. If you accept it anyway, you open the Board to litigation and public distrust. Uphold the law. Reject Agenda Item D-1.

From: [Ekini Lindsey](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1"
Date: Friday, May 9, 2025 4:24:35 AM

Aloha, my name is Ekini Lindsey, and

I am a concerned Kanaka Maoli writing in opposition to Agenda Item D-1. The Army's failure to consult 'Aha Moku or conduct meaningful analysis of cultural impacts is reason enough to reject the FEIS. Below are my strong views in opposition!!

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

I respectfully invoke these names, which signify ahupua'a(land division) and pu'u (hill sites) surrounding Mauna A Wakea and Pōhakuloa. Equally important, I call forth the names of my ancestors- Thomas John Weston Lindsey, William Miller Seymour Lindsey, George Miller Seymour Lindsey, and George Mahalopiha Lindsey, my forefathers whom traversed these sacred lands while employed by John Palmer Parker from 1847 to the 1960's. In addition, in 1881 ascent of Mauna A Wakea by Queen Emma and her entourage, William Seymour Lindsey, accompanied the Queen due to his knowledge of the mountain and witnessed the "ceremonial cleansing" at Lake Waiau, highlighting the interconnectedness of sacred sites from mountain to sea. These are the mo'olelo or stories that are documented and were shared to me by my kūpuna. From pristine land to destruction, the military's perceived arrogance over the years, protesting for their future while claiming to care about cultural sites, land stewardship, and indigenous matters, is perplexing. How can they simultaneously express concern for the land and engage in destructive activities like bombing and desecration, seemingly without logical explanation. Enough is Enough!!! We urge the Military to vacate our islands immediately!!! The devastating impact of their presence has been WAR based and destruction from the world, which contradicts the values of aloha āina that we, as islanders, hold dear. We are against WAR, against BOMBS, against Military actions that KILL and destroy people. With their presence here, it's like we, Kānaka are condoning such behavior.

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

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

From: [Koa L](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Friday, May 9, 2025 12:10:45 AM

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

My name is Koa Luke and I am from Waiawa. 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,

Koa Luke

From: [Mike Maddux](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 9:26:12 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." V1 at 3-122

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels". V1 at 3-117 Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” V2 at D-214

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

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

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

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

Mahalo for considering my testimony.

Michael Maddux

Hawi

From: [Sky Mainz](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Friday, May 9, 2025 11:18:56 AM

Aloha Board of Land and Natural Resources, my name is Sky Mainz, I live in Waimea on the Big Island. I speak before you today with deep respect, although it is my kuleana to urge you to reject the FEI statement regarding continued military use of these lands.

Our ‘āina is not just land—it is a living, breathing ancestor, deeply rooted in our identity, our culture, and our history. The ongoing bombing and poisoning of these sacred places does not only threaten the health of our soil and ecosystems, but it also pollutes the habitats of countless native species found nowhere else on Earth.

These lands were never ceded willingly; they were taken under illegal occupation. It is the duty of the State of Hawai‘i, and particularly the BLNR, to uphold its responsibility to mālama ‘āina and protect these spaces for future generations.

Therefore, with aloha and a deep sense of responsibility to both our past and our future, I respectfully urge you to reject the FEIS and stand for the protection and restoration of our ‘āina.

Mahalo for allowing me to share my testimony.

From: [mailani.makainai](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] testimony
Date: Friday, May 9, 2025 8:12:03 AM

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.

Sincerely,
Mailani Maka'ina'i

Mai maka'u i ka hana.
Maka'u i ka moloā.

Don't be afraid of work.
Be afraid of laziness.

Mailani Maka'ina'i
(808) 425-3029

From: [Kealanei Margeson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony -Pohakuloa
Date: Friday, May 9, 2025 6:57:07 AM

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

My name is Keala Margeson and I am from Kapolei, Hi. 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.

Sincerely,

Keala Margeson

Sent from my iPhone

From: [Rachel Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 8:56:23 AM

Aloha Members of the Board of Land and Natural Resources,

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The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

- a. The FEIS discloses significant lead and heavy metal contamination in PTA lands caused by live fire training. The Army's surface soil sampling detected the following in site soils: antimony, arsenic, cobalt, copper, iron, 1-methylnaphthalene, lead, manganese, naphthalene, selenium, silver, total petroleum hydrocarbons (TPH) as diesel range organics (DRO) and residual range organics, and zirconium. **V1 at 3-106**
- b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact when areas that are more likely to be affected haven't been studied. **V1 at 3-193**
- c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not sampled all of its lands "to determine the presence or absence of munitions constituents." **V2 at D-210**
- d. The FEIS does not address logical questions. How can existing and

future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

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a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

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

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

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

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Mahalo for considering my testimony.

Rachel Tomberlin

From: [Tia Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Thursday, May 8, 2025 11:10:22 PM

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

Mahalo for considering my testimony.

Tia Marie N. M. E.

From: [Tia Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Re: Testimony Submission - Agenda Item D1 (Pohakuloa FEIS) 5/9/25 BLNR Meeting
Date: Friday, May 9, 2025 12:17:11 AM

Aloha e, adding the following to my submitted testimony:

THESE LANDS WERE NEVER LAWFULLY CEDED

There exists no ratified treaty of annexation between the Hawaiian Kingdom and the United States. The lands of Pohakuloa are unlawfully claimed and occupied.

Any jurisdiction assumed by the State of Hawai‘i or U.S. Federal Government over these lands is fraudulent in law, and stands in violation of the following ratified laws of the Hawaiian Kingdom:

- 1839 Declaration of Rights of People and Chiefs - guaranteeing the people's right to land, water, protection, and liberty
- 1840 Constitution of the Hawaiian Kingdom - establishing lawful governance rooted in divine law, equity, and customary tradition
- 1848 Great Mahele - clarifying the rights of the maka‘ainana and limiting the powers of government in favor of the people
- 1960 Civic & Penal Codes - governing land tenure, fiduciary duties, crimes against burial places, and trespass

On Thu, May 8, 2025 at 11:44 PM Tia Marie <tiamasaniai@gmail.com> wrote:

Aloha e,

This testimony is submitted on behalf of myself, Tia Marie Namahama Masaniai-Estrera, a Kanaka Maoli and mo‘opuna of Ko Hawai‘i Pae Aina.

I respectfully but firmly submit the following in response to Agenda Item D.1:

The so-called "ceded lands" of Pohakuloa were never lawfully ceded. No treaty of annexation was ratified, and the rightful descendants were never consulted. As such, any Final EIS approval that assumes lawful U.S. or State jurisdiction over these lands is fraudulent in law, and constitutes a violation of:

- Trust obligations to lawful heirs
- Article XII §7 of the Hawai‘i State Constitution
- HRS §1-1 (Hawaiian common/customary law)
- International conventions protecting cultural property

These lands contain not only ‘iwi kupuna, but irreplaceable waiwai:

- Sacred water sources (wai)
- Nutrients and regenerative soil systems
- Mo‘olelo-bearing imprints: trails, petroglyphs, sacred stones
- Spiritual energy lines connected to genealogy and divine covenant

To allow the U.S. Army to retain the use of these lands under any EIS framework, without full legal redress and lineal consultation, constitutes:

- Breach of fiduciary duty
- Color of law abuse
- Constructive fraud and spiritual desecration

We do not consent.

We call for an immediate halt to this process and demand that all militar-related land use cease until jurisdictional truth is resolved under equity, not occupation.

Please enter this testimony into the public record and confirm receipt.

I am not a developer, foreigner, or funded by foreign systems. I am however standing rich in kuleana, in truth, and in aloha for our keiki, kupuna, and our aina.

As Kanaka Maoli

We do not extract - we restore.

We do not trespass - we remember.

We do not consent - we protect.

This is not a protest. This is a lawful declaration.

This is not an emotional plea. This is an evidentiary serving of notice.

This is not just our voice. This is their voice.

Submitted on behalf of the kupuna, aina, and na keiki the generations who walk in both body and spirit

With kuleana to Ike Kupuna,
Tia Marie N. M. E.

From: [Tia Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Submitted Testimony: 5/9/25 BLNR Meeting Agenda Item D1
Date: Friday, May 9, 2025 12:19:15 AM

Aloha e Chairmember and Members of the Board

The claim that continued U.S. Army occupation of the Pōhakuloa Training Area (PTA) is necessary for military preparedness is misleading and outdated. Far from ensuring security, this justification masks a deeper pattern of land exploitation, environmental destruction, and cultural erasure under the guise of “readiness.”

The Myth of Military Preparedness:

Military officials often argue that PTA is essential for training and readiness. But the truth is, military preparedness does not require the use of sacred and ecologically sensitive lands in the middle of Hawai‘i. In today’s age of advanced technology, training can be conducted using simulations, virtual environments, and existing U.S. mainland bases. Continuing to bomb and destroy Hawaiian lands for “training” is not about readiness—it’s about preserving outdated habits and convenience. The Army has failed to show that Hawai‘i’s unique ecosystems and sacred places offer something essential that cannot be replicated elsewhere. Instead, “readiness” is used as a political shield to justify permanent occupation.

Security for Whom?

The notion that PTA makes Hawai‘i “safer” is deeply flawed. Militarization of the islands actually makes Hawai‘i a target and has historically contributed to geopolitical tension in the Pacific. Real safety for Hawai‘i residents comes not from bombs and war games, but from disaster preparedness, community resilience, food and water security, and climate action—all of which are undermined when land and resources are monopolized by the military. Training to respond to natural disasters does not require live-fire ranges or the ongoing destruction of native landscapes.

Cultural Desecration Disguised as Stewardship:

The Army promotes its cultural resource management as a strength, but no amount of monitoring or documentation can justify training on land that contains burial sites, shrines, and sacred spaces. For Native Hawaiians, these sites are not artifacts—they are living places with deep spiritual meaning. Every time a missile is fired or the land is torn apart by vehicles, it is a desecration. Cultural stewardship means returning the land to its rightful caretakers, not building fences around destruction.

Environmental Harm Hidden Behind Grants:

PTA’s selection for environmental funding like the REPI Challenge only highlights the level of damage already done. Toxic waste, unexploded ordnance, endangered species habitat loss—these are not side effects, they are the reality of military use. The military’s track

record on environmental protection is poor, and no short-term funding can undo decades of contamination and degradation. The only sustainable solution is demilitarization and ecological restoration.

A False Choice:

Framing the debate as a choice between military training or vulnerability is a false binary. The real choice is between a future of continued occupation, destruction, and dependency—or a future of self-determination, cultural integrity, and true environmental stewardship. Hawai'i's people deserve land use rooted in peace, restoration, and respect—not endless war games under the pretense of defense.

The narrative of military preparedness at PTA is not just overblown—it's a strategic distraction from the deeper issue of land justice. It is time to move beyond this myth and return Pōhakuloa to the people and the land itself.

From: [Tia Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS 5/9/25 Meeting Agenda Item D1
Date: Thursday, May 8, 2025 11:14:35 PM

Aloha Chair Case and Members of the Board of Land and Natural Resources,
I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of at the Pōhakuloa Training Area (PTA) on Hawai‘i Island.

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

Key issues that warrant immediate rejection include:

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

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

Sincerely,
Tia Marie N. M. E.

From: [Tia Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Submission - Agenda Item D1 (Pohakuloa FEIS) 5/9/25 BLNR Meeting
Date: Thursday, May 8, 2025 11:44:25 PM

Aloha e,

This testimony is submitted on behalf of myself, Tia Marie Namahama Masaniai-Estrera, a Kanaka Maoli and mo‘opuna of Ko Hawai‘i Pae Aina.

I respectfully but firmly submit the following in response to Agenda Item D.1:

The so-called "ceded lands" of Pohakuloa were never lawfully ceded. No treaty of annexation was ratified, and the rightful descendants were never consulted. As such, any Final EIS approval that assumes lawful U.S. or State jurisdiction over these lands is fraudulent in law, and constitutes a violation of:

- Trust obligations to lawful heirs
- Article XII §7 of the Hawai‘i State Constitution
- HRS §1-1 (Hawaiian common/customary law)
- International conventions protecting cultural property

These lands contain not only ‘iwi kupuna, but irreplaceable waiwai:

- Sacred water sources (wai)
- Nutrients and regenerative soil systems
- Mo‘olelo-bearing imprints: trails, petroglyphs, sacred stones
- Spiritual energy lines connected to genealogy and divine covenant

To allow the U.S. Army to retain the use of these lands under any EIS framework, without full legal redress and lineal consultation, constitutes:

- Breach of fiduciary duty
- Color of law abuse
- Constructive fraud and spiritual desecration

We do not consent.

We call for an immediate halt to this process and demand that all militar-related land use cease until jurisdictional truth is resolved under equity, not occupation.

Please enter this testimony into the public record and confirm receipt.

I am not a developer, foreigner, or funded by foreign systems. I am however standing rich in kuleana, in truth, and in aloha for our keiki, kupuna, and our aina.

As Kanaka Maoli

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This is not an emotional plea. This is an evidentiary serving of notice.

This is not just our voice. This is their voice.

Submitted on behalf of the kupuna, aina, and na keiki the generations who walk in both body and spirit

With kuleana to Ike Kupuna,
Tia Marie N. M. E.

From: [Tia Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] 5/9/25 Testimony Agenda Item D1
Date: Friday, May 9, 2025 12:54:20 AM

My name is Tia Marie Namahama Masaniai-Estrera, a Kanaka Maoli and descendant of Ko Hawai‘i Pae ‘Āina. I submit this testimony in firm opposition to Agenda Item D.1 regarding the continued military use of Pōhakuloa. Pōhakuloa is part of the so-called “ceded” lands—lands that were never legally ceded to the United States. There is no ratified treaty of annexation. Therefore, any U.S. or State claim of jurisdiction over these lands is not only historically inaccurate but also legally invalid. These lands are held in trust. That trust imposes fiduciary duties—duties of loyalty, care, and good faith—owed to the Native Hawaiian people, the rightful beneficiaries. Approving any Final EIS that assumes lawful authority over Pōhakuloa without resolving the underlying legal status of these lands is a direct breach of that fiduciary trust. It is an abuse of power under color of law. Article XII, Section 7 of the Hawai‘i State Constitution affirms the protection of Native Hawaiian rights. That includes our right to land, burial sites, and access to sacred and cultural resources. By allowing the continued military occupation of these trust lands, the State and Federal governments are failing their fiduciary obligations and violating the public trust doctrine. These lands exist to uphold the well-being, culture, and future of Native Hawaiians. Trust lands are not for destruction. They are not bombing ranges. They are not tools to justify the fraudulent narrative of “military readiness. The continued occupation of Pōhakuloa under the pretense of readiness is a smokescreen—used to conceal decades of environmental harm, cultural desecration, and breach of trust. Real security for Hawai‘i does not come from war games. It comes from food sovereignty, disaster resilience, and the protection and restoration of ‘āina. We do not consent to the ongoing desecration of these lands. We call for an immediate halt to this process until jurisdictional questions are answered under lawful, not assumed, authority. This is not a protest. It is a lawful declaration and a notice of evidentiary truth: these lands were never legally given. It is a formal demand for fiduciary accountability, for the return of trust lands to their rightful stewards, and for justice grounded in law, not in force. With kuleana and in truth, Tia Marie N. M. E.

From: [Indi'genius Innovations](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Submitting Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Friday, May 9, 2025 12:41:09 AM

To:

Chair Dawn Chang

Department of Land and Natural Resources

& Honorable Committee Members

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

Aloha e Chair Chang and Esteemed Committee Members,

I write today as a concerned Kanaka Maoli steward of this ‘āina, from over 7 generations of Mahi'ai (farmers) on Maui and with 4 generations of United States military and government service men and women in my ohana, 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,

Ms. Danae Julin-elena Marin

Kula, Maui, Hawai‘i

Kanaka Maoli / Cultural Practitioner / Owner of Indi'genius Innovations.

Indigenius.innovations@gmail.com

PO Box 881133 Pukalani HI 96788

From: [lilinoe](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Friday, May 9, 2025 1:03:35 PM

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

My name is Yuzu Martin 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,

Yuzu Martin

From: [Rik Masterson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to BLNR to REJECT (not Accept) the Final EIS on Pohakuloa
Date: Friday, May 9, 2025 7:46:41 AM

Aloha BLNR members,

I, Rik Masterson, resident of Hilo, HI am strongly opposed to any further bombing and desecration at Pohakuloa. We urge you to REJECT the Final EIS on Pohakuloa that is extremely deficient in a number of areas.

1. Pohakuloa is classified as a State Conservation District, the highest protected land status. Bombing, shelling and military pollution are not compatible land uses in a conservation district. It's a no brainer! The full extent of military destruction at Pohakuloa has not been thoroughly investigated.
2. The Final EIS inadequately addresses concerns for protection of endangered plant and animal species at Pohakuloa, and with Trump's environmental budget cuts it appears protection of endangered species will be further trashed.
3. The military record of environmental contamination and failed cleanup in Hawaii is staggering. Tens of millions of live rounds from a wide variety of weapons systems have been fired from the lease lands firing points into the Federally seized (not owned) lands of the 51,000 acre impact area. The military didn't even pay 1 cent for the 84,000 acres of Hawaii crown and government lands seized by a Presidential executive order in 1964 under President Lyndon B. Johnson. Our organization has documented 57 present or former military sites on Hawaii island totaling more than 250,000 acres of military contamination. The present PTA commander LTC Timothy Alvarado has the gall to say " We (the military) are stewards of the land." Please list all the various weapon systems fired into the PTA impact area and the number of rounds fired over 80 plus years.
4. The military cultural impacts and environmental assessments are superficial and insufficient. The US military has been bombing and shelling Pohakuloa for more than 80 years, and yet more than half of Pohakuloa hasn't had an assessment survey of cultural and historic sites. What does that tell you?
5. The increasing fire risk at PTA is inadequately addressed. Pohakuloa is a dry windy area in the center of Hawaii Island. The Final EIS says that military bombing and shelling has started 1261 wildfires at PTA since 1975. It also notes that prior to 2012 data is incomplete so the number of fires could actually be higher. The final EIS also says that the wildfire risk will only be increasing in the future due to more and more extremes of climate change. One fire started on PTA in 2022, a year before the Lahaina fire, burned more than 12,000 acres off the base destroying endangered species habitat.
6. The Army completely understates the quantity of Depleted Uranium (DU) weapons fired at PTA and the Hazards. The EIS states 400 DU spotting rounds for the Davy Crockett Nuclear weapon system. Army Hawaii Garrison Colonel Howard Killian testified before the Hawaii County Council in 2008, that based on the number of people certified to fire the Davy Crockett weapon system at PTA, TWO THOUSAND DU spotting rounds were fired at PTA. This is after years of denial by the Army that any DU was fired at PTA. It is likely that

additional DU penetrating rounds were also fired at PTA. Col. Killian testified that DU was not prohibited from being used in training until 1996. DU has a half life of 4.5 Billion years and when DU metal is hit with high explosives it burns and turns into DU oxide particles that can be carried long distances in the wind. Dr. Lorrin Pang, MD, listed in the top 3% of America's best doctors, who spent 25 years in the Army medical corps has stated that inhaling DU oxide particles is the most deadly form of radiation. It can travel through the lymph system causing various cancers. It also causes birth defects and even genetic damage passed to future generations. Dr. Pang has said that Pohakuloa should be ringed 360 degrees with proper air filters for a full year to really see what toxins are coming off the base.

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

- A. A response to the Hawaii County Council regarding Resolution 639-08 based upon comments our organization and others raised in the draft EIS process
- B. Additional discussion on the rare environmental setting on the high-elevation sub-alpine tropical dryland ecosystem.
- C. A complete inventory of archeological sites that have been or may be impacted by military training.

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

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

Mahalo for your thoughtful consideration of these concerns.
I pray you will make the right decision, for the land and people of Hawaii.

Sincerely,

Rik Masterson
Hilo, HI

From: [Mauna Kea Protectors at UCSB](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Pōhakuloa! Reject the Army FEIS!
Date: Thursday, May 8, 2025 10:23:24 PM

Good evening Board of Land & Natural Resources,

We, Mauna Kea Protectors at UCSB, vehemently oppose the U.S. army's proposed lease renewal on sacred Pōhakuloa. The army has committed detrimental and devastating damage to Pōhakuloa, including extreme environmental degradation from the ongoing live-bombing, endangerment of native species and overall desecration of a wahi pana. The FEIS does not thoroughly address all concerns and refuses to do so, with the Army purposefully leaving out significant information regarding discovering Native Hawaiian burial artifacts. This lack of responsibility cannot be unaccounted for as it exemplifies the army's carelessness for the sanctity of the land. The continued desecration and disrespect cannot be absolved through FEIS revisions; the only solution forward is to reject the FEIS in its entirety and pressure the U.S. army to leave and clean up Pōhakuloa!

As our UC continues to fund the Thirty Meter Telescope set to to be built on sacred Mauna Kea, it is imperative to call for the protection of *all* sacred lands in Hawai'i from imperialist forces. We urge you to reject the Army FEIS for Pōhakuloa and return these lands to its rightful stewards.

Sincerely,
Mauna Kea Protectors at UCSB

From: [Lei'ohu N Maydeen](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Friday, May 9, 2025 8:00:35 AM

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

My name is Lei'ohu Ryder 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 aloha,
Lei'ohu Ryder
808-276-9677*

Sent from my iPhone

From: [Alicia Mazingo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 7:37:48 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it?* In response to these questions, the Army refers to FEIS section 3.5.6, which says “cleanup and restoration . . . are not part of the Proposed Action” and “future cleanup and restoration requirements, standard processes, and associated cost are unknown.” **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous waste storage

on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels". **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the "entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021." **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions ("GHGs") for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

Submittal at 23

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

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

Mahalo for considering my testimony.

Alicia Mazingo

Alicia Mazingo
MDC | Mazingo Design + Consulting
(808) 866-2895
aliciakauna@gmail.com

From: [Michele Mazzei](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Friday, May 9, 2025 12:32:49 AM

Aloha Board Members,

I live on Hawai‘i Island. I strongly oppose Agenda Item D-1. Pōhakuloa is sacred ‘āina, and the Army’s FEIS is incomplete, lacking cultural consultation and proper environmental surveys.

We’ve seen the damage done at Red Hill and Kaho‘olawe. We cannot let Pōhakuloa be next. Please reject this FEIS and protect what’s left of our ‘āina.

Mahalo,
Michele Mazzei

From: [Awakenedaloha](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT THE EIS!
Date: Friday, May 9, 2025 6:32:02 AM

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

1. Continued Desecration of Sacred Sites

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

2. Environmental Irreversibility

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

3. Illegitimacy of U.S. Military Occupation

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

4. Failure to Uphold the Public Trust Doctrine

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

further destruction rather than conservation.

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

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

Me ka 'oia'i'o,
Elijah Kalā McShane
Papakolea, Kewalo Uka, Kona, O'ahu, Hawai'i
Awakened Aloha
Awakenedaloha@gmail.com

From: cerametz@aol.com
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Agenda Item D-1
Date: Thursday, May 8, 2025 10:08:04 PM

*Aloha e Chair Chang and Members of the Board of Land and Natural Resources,
My name is Sarah Metz 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.
Sarah Metz*

[Sent from the all-new AOL app for iOS](#)

From: [Laila Moiré-Selvage](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 7:17:04 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

a. In addition to the harm that has already occurred, how much worse will land contamination get with continued Army operations? What practices does the Army follow to prevent munitions contaminants from

accumulating? The Army says it follows Standard Operating Procedures that are not available for public disclosure. **V2 at D-211**
The EIS only gives a vague summary. **V2 at E-15 & E-16**

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

a. DHHL "feel[s] strongly" that the Army should do long-term air-quality and water-table testing at PTA. **V2 at D-220** The Army

declined, pointing to a one-year air quality monitoring program in 2007 that did not find levels outside standards and that the aquifer is very deep. However, the Army admits there is a shallow aquifer that has not been tested despite recommendations to do so.

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

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a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

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

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

Mahalo for considering my testimony.

Laila Moiré-Selvage
808-896-6561

From: [dave mulinix](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] "Testimony for Agenda Item D-1"
Date: Friday, May 9, 2025 8:58:06 AM

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

My name is Dave Mulinix, Hawaii State Representative of Greenpeace Hawaii, and on behalf of our thousands of members and supporters statewide we 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,

Dave Mulinix, Hawaii State Representative, Greenpeace Hawaii

From: [Rhonda Naki](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] End The Military Lease At Pohakuloa
Date: Friday, May 9, 2025 1:46:06 PM

Aloha BLNR,

I am in favor of rejecting the EIS and ending the lease of Pohakuloa.

Mahalo
Rhonda Naki

>>

IMPORTANT: This e-mail (including any attachments) is intended for the use of the individual or entity to which it is addressed and may contain information that is classified, private, or confidential. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering the message to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this communication is prohibited. If you have received this communication in error, please notify us immediately by replying to this e-mail and then deleting the email and attachments. Thank you.

From: [Charla Naone](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Friday, May 9, 2025 4:29:10 AM

Aloha Members of the Board of Land and Natural Resources,

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

Mahalo for considering my testimony.

Charla L.R. Naone, DNP, RN

Ho'ouna 'ia mai ka'u iPhone

From: [Amber Needham](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Project Pōhakuloa
Date: Thursday, May 8, 2025 10:02:33 PM

Aloha Land Board Members,

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

Pōhakuloa is just up the road from my 'ohana and I's house and remains 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.

Ke aloha 'āina,
Amber Mei Lan Waiokeola Needham
Royce Makanamaikēakua Needham
Kōnale Needham (3 years old)
Tauwati Needham (1.5 years old)

Kaūmana, Hilo, Hawai'i

Sent from my iPhone

From: [Emily Nellestein](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025
Date: Friday, May 9, 2025 5:13:27 AM

Aloha Members of the Board of Land and Natural Resources,

My name is Emily Lauren Nellestein. I hold a Bachelor's in Environmental Studies and a Master of Science in Biomimicry. 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,
Emily Nellestein, current resident of Atlanta, GA — former resident of O`ahu.

May 9, 2025

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

I am urging the Board to **reject the Army's final Environmental Impact Statement** (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions. For public and environmental safety and health, I am also urging the Board to require the Army to conduct necessary investigations as part of the environmental review process, rather than deferring these issues to the future, imploring the Board to require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

1. Insufficient Mitigation Measures and Proper Protection of unique native Hawaiian celestial to terrestrial sites, burial caves with iwi kupuna and moe pū, and other precious artifacts.

- The FEIS acknowledges ongoing negative impacts from past operations, which the Army proposes to continue indefinitely.
- New mitigation proposals are seen as inadequate, focusing only on studies, reporting, monitoring, and a biological control for wildfires, rather than immediate action.
- Existing mitigation measures are ineffective, particularly in protecting cultural resources.
- The FEIS excluded many lands from its historic properties survey, raising concerns about the thoroughness of the impact assessments.

2. Environmental Impact to Ground Water, Clean Air Act, & Greenhouse Gas Emissions:

- The EIS reveals that the Army does not have data on its greenhouse gas emissions (GHGs) for activities on state lands, despite reports indicating the U.S. military's significant GHG production.
- The FEIS claims that the Army's GHG generation has not significantly impacted climate change, a conclusion questioned due to the lack of data.

Due to these reasons, I entreat the Board to REJECT the Army's final Environmental Impact Statement.

Mahalo for your consideration and active responses



Kalei Nu'uhiwa, PhD
Waiākea, Hilo Resident
kaleinuhiwa@gmail.com

From: [Maan Oda](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the army's final EIS
Date: Friday, May 9, 2025 12:24:19 AM

It is plain and simple. We reject the army's final EIS and ask for the lease to end for God's sake and for the sake of humanity. What else is there to say to ask you to stop bombing our lands under the exercise of so called "security".

MILITARY OUT NOW

Sincerely yours,
Jay

From: [Anela Oh](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area Testimony
Date: Friday, May 9, 2025 8:55:06 AM

Aloha Land Board Members:

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

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

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

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

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

- Inadequate Environmental and Cultural Impact Analysis

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

- Concerns about depleted uranium on the site have gone unaddressed

- Military usage is incompatible with the conservation district designation

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

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

Sincerely,
Anela Ming-Yue Oh

Hawai'i Island

From: [Captain Oscar](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 8:04:13 AM

Aloha Members of the Board of Land and Natural Resources,

Please **REJECT** the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

c. The EPA pointed out PTA soils are highly permeable and some

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

c. The Army said it will comply with the "Comprehensive Environmental Response, Compensation, and Liability Act" (CERCLA), which requires remedial action concerning stored hazardous substances, "necessary to

protect human health and the environment with respect to any such substance remaining on the property has been taken before” transferring the land back. However, the Army will not be clear on what this will mean, changing its stance on whether it stores hazardous substances on state lands (see #3c) and refusing to disclose any remediation actions.

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

a. The state Department of Health (“DOH”) commented “There is no need for the Army to wait for the end of the lease period to address known and potential contamination under [federal laws]. Sites identified in the first and second Draft EIS documents . . . that are on state land and no longer within currently active range locations should begin the

cleanup process as soon as possible.” **V2 at D-223**

b. The Army flagged this comment as “not resolved”.

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

a. The Army says there’s no evidence that it has, but also “groundwater quality data are limited”; researchers recommended sampling groundwater in shallow aquifers; and no one has done this sampling or analysis. **V1 at 3-193**

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

(6) Could contaminants have impacts on human health?

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

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

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

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

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

- a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?
- b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.” **V1 at 4-16** How can it reach this conclusion if it does not have data?

(10) Existing mitigation proven insufficient by ongoing impacts.

- a. The FEIS concedes ongoing impacts from past PTA operations - which the Army proposes to continue indefinitely. **V1 at 4-11 - 4-25**
- b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.
- c. For all other impacts, the Army will just continue existing mitigation measures. But these are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. **Submittal at 23**
- d. The FEIS excluded many lands from its survey of historic properties, including iwi kupuna, on state lands. **V1 at Fig. 3-8** How can the Army assess impacts to cultural resources if it does not even know if they are there?

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

Mahalo nui loa for considering my testimony.

Oskar

From: [Will Owens](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Friday, May 9, 2025 7:33:59 AM

To:

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

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

Aloha e Chair Chang and Esteemed Committee Members,

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

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

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

1. Continued Desecration of Sacred Sites

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

2. Environmental Irreversibility

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

3. 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,
Will Owens

Kailua, Oahu
(808) 979-6911
wowens2k@gmail.com

From: [Monika Panfiglio](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 6:06:14 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

This has lasting effects for generations, and this can be your legacy to stop this great misuse of Hawaii lands.

(1) Contamination from past, present, and future military actions.

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

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

c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not sampled

all of its lands “to determine the presence or absence of munitions constituents.” **V2 at D-210**

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can’t do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says “cleanup and restoration . . . are not part of the Proposed Action” and “future cleanup and restoration requirements, standard processes, and associated cost are unknown.” **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

a. In addition to the harm that has already occurred, how much worse will land contamination get with continued Army operations? What

practices does the Army follow to prevent munitions contaminants from accumulating? The Army says it follows Standard Operating Procedures that are not available for public disclosure. **V2 at D-211** The EIS only gives a vague summary. **V2 at E-15 & E-16**

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

b. The Army flagged this comment as "not resolved".

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

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find levels outside standards and that the aquifer is very deep. However, the Army admits there is a shallow aquifer that has not been tested despite recommendations to do so.

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

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Far from providing a comprehensive reference, the Army’s FEIS obstinately refuses to disclose the foreseeable harms their actions cause to Hawai’i’s land, water, cultural

resources, and its people. If the Army does not know, the Board should reject the FEIS and require the Army to conduct necessary investigations as part of this environmental review process and not relegate these important issues to some unaccounted-for future scenario.

Mahalo for considering my testimony.

Monika Panfiglio
Sent from my iPhone

From: [Debra Grace Peri](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 6:50:07 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

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Yet there is no mitigation or study proposed to prevent this from happening at PTA.

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

- a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?
- b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.” **V1 at 4-16** How can it reach this conclusion if it does not have data?

(10) Existing mitigation proven insufficient by ongoing impacts.

- a. The FEIS concedes ongoing impacts from past PTA operations - which the Army proposes to continue indefinitely. **V1 at 4-11 - 4-25**
- b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.
- c. For all other impacts, the Army will just continue existing mitigation measures. But these are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. **Submittal at 23**
- d. The FEIS excluded many lands from its survey of historic properties, including iwi kupuna, on state lands. **V1 at Fig. 3-8** How can the Army assess impacts to cultural resources if it does not even know if they are there?

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

Mahalo for considering my testimony.

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Debra Grace Peri

Pronouns: She/Her

debragraceperi@gmail.com

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En cada corazón hambriento

Es verdad

Lo que buscas

También te esta buscando

—Mugwort

From: [Foley C. Pfalzgraf](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Strong Opposition to the Renewal of the Lease for Pohakuloa and Acceptance of the EIS
Date: Thursday, May 8, 2025 10:17:37 PM

Aloha,

As a resident of Hawai‘i, I am writing to document my opposition to the renewal of the Army lease for Pohakuloa, and in particular, to reject the environmental impact statement because it is inadequate, inaccurate, and reveals a lack of attention to Hawai‘i’s rule of law and constitution (including case Kahaulelio V DLNR in 2019).

Specifically, the US Army has a long history of dropping bombs and not clearing up the mess. From the Solomon Islands (read more [here](#)) to Vanuatu (read more about Million Dollar Point) to the many sites across the pae ‘āina of Hawai‘i which continue to be impacted by unexploded ordnance, or in the context of Pohakuloa live fire training and depleted uranium. I do not trust the US Army to treat a future lease better than the ones they have held previously, from Makua to Kaho‘olawe, the time for unrestrained military use of lands is long past--it is the duty of the BLNR to mālama ‘āina not desecrate it. The EIS specifically does not include detailed information for how damage will be remediated. How will Pohakuloa be conserved? The EIS and proposed use are incompatible with conservation.

Responsible stewardship of land should be of the highest priority for BLNR. This is particularly needed as our islands face a challenging climate-affected future, shortages of housing, commitments for future food production, and a hope that Hawaiian communities remain on island and able to access their lands for generations to come. There is no Hawai‘i without Hawaiians. It is the responsibility of the BLNR to evaluate carefully whether the US Army is willing to treat the lands of Pohakuloa and the communities genealogically connected with the respect needed to ensure the lands are safe and abundant for future generations. I firmly do not believe the US army has any capacity to do so and continually lacks transparency and accountability. Specifically, the Army EIS inadequately considers concerns around Native Hawaiian cultural access and obscures the cultural importance of the lands.

The EIS is substandard and lacking in its assessment, revealing a lack of attention and care.

Reject the EIS, reject the army lease of Pohakuloa.

Foley

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Foley C. Pfalzgraf, MSc, MA

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[\(630\) 336-2499](tel:(630)336-2499)

Freelance Writer

University of Oxford, Alumna

AmeriCorps Volunteer in

Service to America, 2016-2018

From: [Franklin Pfister](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Urge to reject the FEIS in Item D-1
Date: Friday, May 9, 2025 6:18:42 AM

Aloha e Chair Chang and the members of the board of land and natural resources.

My name is Franklin Pfister, and I am from Los Angeles, California. I'm writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pohakuloa Training Area, and respectfully urge you to reject the FEIS in item D-1.

Pohakuloa is a sacred place on Hawai'i island, similar to how those in other traditions view a church or a mosque, and is home to irreplaceable Native Hawaiian cultural sites as well as to endangered species. The U.S. Army has not demonstrated the capacity or desire to serve as a legitimate steward of this land, and the FEIS does not meaningfully address these concerns.

For example, the U.S. 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 disrespectful and 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 the water. This is also disrespectful, unacceptable, and irresponsible.

These sorts of activities are in direct conflict with Hawaiian values of conservation, cultural integrity and aloha 'aina (a vantage point that views our connection with land to be familial... so to test weapons and continually desecrate the land is akin to attacking a family member), and they are in direct conflict with the US military values of Respect, Selfless service, Honor and Integrity. They are also in direct conflict with our collective human responsibility to care for the spaces we are living in and try to reverse our impact on climate change.

This land should be stewarded and cared for by those who respect and appreciate the significance of the land for the people of Hawai'i. Aside from the concerns for the land and the beings who live there (human and non-human) and the disregard for the cultural and environmental impact of the way the site is used, the U.S. military use is also not compatible with conservation district designation.

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 Pohakuloa. If you do so, you all would be an inspiring example of hope for a lot of people, and you would help us all move in a direction of healing.

Mahalo, and thank you,

Franklin Pfister

From: [Kanani Puou](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for Pohakuloa Training Area
Date: Friday, May 9, 2025 7:24:32 AM

To: Chair Member Dawn Chang; Hawai'i Island Member Riley Smith; and other members of the Board of Land and Natural Resources

My name is Kanani, I am of Lahaina, my kū'auhau (lineage) comes from Moku o Keawe.

I am not here to give you my mo'okū'auhau (genealogy) but to make you understand the detriment of continuity of the destruction of my kupuna (ancestral) lands.

How wai is not a luxury for Kanaka Maoli, as I said in my last testimony at the in person CWRM meeting in Lahaina on April 28.

I say to you today:

- 'Āina is not a training area for Kanaka Maoli!!!
- 'Āina is not a training area for Kanaka Maoli!!!
- 'Āina is not a training area for Kanaka Maoli!!!

'Āina is my eldest kupuna, like she has protected me all these years on this Honua. I protect her by telling you to REJECT the Army's Extension for EIS on PTA.

The extension shows the lack of respect for our Kanaka Maoli's mo'omeheu (cultural), wahi (environmental), and mauli ola (health concerns).

I am in STRONG OPPOSITION to the Army's Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area (PTA).

Mahalo nui loa,
Kanani P.
kanani.puou@gmail.com

From: [Kanani Puou](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for the EIS for PTA
Date: Friday, May 9, 2025 7:40:28 AM

To: Chair Member Dawn Chang, Hawai‘i Island Member Riley Smith, and other members of the BLNR.

My name is Leimaile, from ‘Ihikapalaumaewa.

•He ali'i ka 'āina; he kauwa ke kanaka
(‘Ölelo No'eau #531)

‘Āina is my eldest kupuna, like she has protected me all these years on this earth. I protect her by telling you to REJECT the Army’s Extension for EIS on PTA.

“Sometimes when we are looking at something very serious it’s better to fight on my feet then my knee's” Keeaumoku Kapu

Which means I’ll fight and be in opposition in everything that the military is doing here in Hawai‘i until the end of my days.

I am in STRONG OPPOSITION to the Army’s Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area (PTA).

Mahalo,
Leimaile K.

From: [Kunae Diehl](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] AOLE POHAKULOA
Date: Friday, May 9, 2025 9:32:53 AM

Aloha Chair and Members of the Board,

I am a Native Hawaiian who strongly opposes Agenda Item D-1. Pōhakuloa is not just land—it is sacred ‘āina, deeply connected to our ancestors, stories, and identity.

The Army’s FEIS is legally and culturally inadequate. It ignores our laws, skips proper consultation, and fails to assess the true impacts of continued military occupation. After the destruction of Kaho‘olawe and the poisoning at Red Hill, we must say: no more.

I urge you to reject this FEIS and uphold your kuleana to protect what is sacred.

Mahalo,
Kūna’e C. Pu’uone

From: [Simone S](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa
Date: Friday, May 9, 2025 12:01:00 AM

Aloha Members of the Board of Land and Natural Resources,

My name is Simone Saldajeno, 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,
Simone Saldajeno

Oahu Hawaii

From: [Kate Sammler](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 3:26:42 AM

Aloha Members of the Board of Land and Natural Resources,

I am writing to you as an environmental scientist with a focus on environmental justice and Indigenous rights. The harms done to the landscape at Pōhakuloa cannot continue. The environmental impacts are being downplayed by the Army as it is clear that the contamination from heavy metals and unexploded munitions will take generations upon generations to heal. It is time for the Board to recognize the harm and the will of the people. Please recognize the substantial and cumulative environmental impacts done to Pōhakuloa and reject this EIS.

Mahalo,
Dr. Katherine G. Sammler

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." V1 at 3-122

b. The existing leases only require: "Weapons and shells used in connection with training activities are to be

removed to the extent that technical and economic capability exists and provided that expenditure for removal would not exceed the fair market value of the land.” DEIS V.1 at 3-14 (emphasis added). Left unchallenged, the Army could simply say that it’s too expensive to clean up and leave their mess behind – in fact, the inclusion of such language incentivizes them to do so.

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as “not resolved”.

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. V1 at 3-117 Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the "entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021." V2 at D-214

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. V1 at 3-220 As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

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

Mahalo for considering my testimony.

From: [Daniella Scalice](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please reject the Army's FEIS
Date: Friday, May 9, 2025 1:20:45 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

- a. The FEIS discloses significant lead and heavy metal contamination in PTA lands caused by live fire training. The Army's surface soil sampling detected the following in site soils: antimony, arsenic, cobalt, copper, iron, 1-methylnaphthalene, lead, manganese, naphthalene, selenium, silver, total petroleum hydrocarbons (TPH) as diesel range organics (DRO) and residual range organics, and zirconium. **V1 at 3-106**
- b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact when areas that are more likely to be affected haven't been studied. **V1 at 3-193**
- c. The EPA pointed out PTA soils are highly permeable and some compounds are highly soluble and won't be absorbed into the soil. The EPA asked for soil sampling analysis to show how the Army knows contamination hasn't spread. The Army responded it has not

sampled all of its lands “to determine the presence or absence of munitions constituents.” **V2 at D-210**

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

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a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can’t do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says “cleanup and restoration . . . are not part of the Proposed Action” and “future cleanup and restoration requirements, standard processes, and associated cost are unknown.” **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

- a. In addition to the harm that has already occurred, how much worse will land contamination get with continued Army operations? What practices does the Army follow to prevent munitions contaminants from accumulating? The Army says it follows Standard Operating Procedures that are not available for public disclosure. **V2 at D-211** The EIS only gives a vague summary. **V2 at E-15 & E-16**
- b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.
- c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous waste storage on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

- a. The state Department of Health ("DOH") commented "There is no need for the Army to wait for the end of the lease period to address known and potential contamination under [federal laws]. Sites identified in the first and second Draft EIS documents . . . that are on state land and no longer within currently active range locations should begin the cleanup process as soon as possible." **V2 at D-223**
- b. The Army flagged this comment as "not resolved".

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

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- a. DHHL “feel[s] strongly” that the Army should do long-term air-quality and water-table testing at PTA. **V2 at D-220** The Army declined, pointing to a one-year air quality monitoring program in 2007 that did not find levels outside standards and that the aquifer is very deep. However, the Army admits there is a shallow aquifer that has not been tested despite recommendations to do so.
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a TERRIBLE, fire prone place to do military training. Yet, the Army rejects proposals to relocate training - only mitigation for monitoring fires and inhibiting invasive grass growth.

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

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

d. The FEIS excluded many lands from its survey of historic

properties, including iwi kupuna, on state lands. **V1 at Fig. 3-8** How can the Army assess impacts to cultural resources if it does not even know if they are there?

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

Mahalo for considering my testimony.

Daniella Scalice

From: [Pi'ilani Schneider](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the current Army EIS
Date: Friday, May 9, 2025 12:44:08 PM

I cast my vote to reject the current Army EIS and reject the renewed lease of these stolen lands.

From: [Brandy-Alia Serikaku](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa Army Training EIS Testimony
Date: Friday, May 9, 2025 11:14:19 AM

Aloha mai kākou,

My name is Brandy-Alia Serikaku, a native Hawaiian, a proud resident of Hilo since we moved here when I was four years old, an artist dedicated to reclaiming space for Hawaiians, and a mother of 5 fluent 'ōlelo Hawai'i children. Our 'ohana is dedicated to Hawai'i and the perpetuation of our culture, language, practices and worldview.

I am urging the BLNR to reject, dismiss, and forever nullify the US Army's EIS. Not only is it a farce that the fake State of Hawaii has leased Pōhakuloa's actually Hawaiian Kingdom Crown Lands/ deemed CONSERVATION land to the Army for military training for 65 years for a measly-no-way-ever-going-to-benefit-the-economy for ONE HUNDRED PENNIES, it is also intentionally slap-in-the-face ridiculous.

Stop the madness and dillusion that the fake State of Hawaii has implemented and operated under since it's illegal inception, the EIS does not suffice because it has left out burial sites, as well as the following:

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

Again I employ the BLNR to reject the US Army's EIS and take action to start the pono process of addressing Hawai'i's future, with out the US military and with the Hawaiian Kingdom.

Na'u nō,
Na Brandy-Alia Serikaku

From: [Lauren Kepa'a-Tam Sing](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pōhakuloa Testimony
Date: Friday, May 9, 2025 5:19:54 AM

Aloha Land Board Members:

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

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

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

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

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

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

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

Sincerely,

Lauren Kepa'a-Tam Sing

From: [Oreo Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Opposing the Final Environmental Impact Statement (EIS) for U.S. Military Use of Pōhakuloa Training Area
Date: Friday, May 9, 2025 9:25:53 AM

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 strongly urge your rejection of the Final Environmental Impact Statement (EIS) submitted in support of continued U.S. military use of the Pōhakuloa Training Area (PTA).

Pōhakuloa is not merely land—it is a sacred wahi pana, embedded in ancestral knowledge, ceremony, and kuleana. For over 70 years, this sacred landscape has suffered relentless degradation under military occupation. The EIS does not reflect responsible stewardship—it represents a continuation of desecration and dispossession.

On behalf of our lāhui, I submit this testimony to raise four urgent and interconnected concerns, with deeper evidence and documentation added to reinforce the urgency of this matter:

1. Ongoing Desecration of Sacred Sites

Pōhakuloa holds immense cultural and spiritual value, with ancient trails, heiau, and iwi kūpuna throughout. Military activity has repeatedly bombed, bulldozed, and disrespected these sacred spaces. This is a violation of Native Hawaiian cultural and religious rights and a breach of the DLNR’s kuleana to mālama ‘āina.

The FEIS excluded many areas from its survey of historic properties, including possible iwi kūpuna, which means significant impacts on cultural resources are not being properly assessed or mitigated.

2. Irreparable Environmental Harm

Contamination from Past, Present, and Future Military Actions

- The FEIS discloses widespread contamination—including lead, heavy metals, petroleum hydrocarbons, and more—across PTA lands.
- The Army claims low rainfall limits contamination spread, yet has not tested shallower aquifers most likely to be affected.
- The EPA flagged the Army’s failure to assess how contaminants have spread through highly permeable soils.
- The Army admitted it has not sampled all lands for munitions-related contaminants.
- The FEIS fails to answer: how will contamination be removed? Has it spread to plants, animals, or water?

Potential and Means to Restore These Lands

- The Army says cleanup and restoration are “not part of the Proposed Action.”
- Current leases only require cleanup if it is economically feasible—an enormous loophole that could allow the Army to walk away from its mess.
- The Army claims CERCLA compliance, but offers no clear plan for remediation, and contradicts itself on whether hazardous substances are even present.

Withholding of Critical Information

- The Army refuses to disclose Standard Operating Procedures for contamination control.
- KAHEA’s inquiries into hazardous waste spills were met with demands for FOIA requests and deleted sections in the FEIS.

Lack of Action on Cleanup

- The Hawai’i Department of Health recommended immediate cleanup on inactive areas. The Army refused.

Groundwater and Human Health Risks

- The Army admits groundwater data is limited and has not sampled shallow aquifers.
- Contaminants like perchlorate could pose serious threats, but no testing or mitigation has been done.
- DHHL urged long-term air and water testing. The Army declined, relying on outdated 2007 air quality data.
- The FEIS admits there are exposure pathways to humans, and even references OSHA lead exposure violations at similar sites, but offers no plan to monitor or mitigate this risk.

Cumulative Environmental Impacts

- The FEIS only analyzes 22,750 acres of state land, not the full 132,000-acre PTA.
- It fails to consider how full-scale operations impact climate, housing, species, and the economy.

Fire Hazards

- There have been 1,261 fires since 1975, with 1,007 caused by military activity.
- Pōhakuloa is especially fire-prone. Still, the Army refuses to consider relocating training and instead offers limited mitigation measures.
- Endangered species like the Palila are at increased risk of extinction due to fire threats, as noted by the Department of Interior.

Greenhouse Gas Emissions

- The Army does not track GHG emissions for its activities at PTA.
- Despite this, the FEIS claims there is no meaningful contribution to climate change—an unsupported conclusion.

Ineffectiveness of Existing Mitigation

- Impacts continue despite existing mitigation programs, especially to cultural resources.

- Proposed new mitigation is limited to monitoring, studies, and an access agreement for Native Hawaiians—none of which address contamination, fire, or land restoration.
-

3. Illegitimacy of Military Occupation

The U.S. military presence in Hawai‘i stems from the illegal overthrow and annexation of the Hawaiian Kingdom. Continued military use of these lands violates international law and Indigenous self-determination rights.

4. Breach of the Public Trust Doctrine

Under Article XI, Section 1 of the Hawai‘i State Constitution, DLNR is obligated to protect the state’s natural and cultural resources for future generations. Approving this EIS would abandon that duty in favor of further harm and desecration.

Conclusion:

Far from being a reliable or adequate document, the Army’s FEIS is riddled with omissions, contradictions, and failures to disclose vital information about contamination, ecological degradation, cultural impacts, and legal obligations. It does not support continued military occupation—it exposes why it must end.

I urge this committee to reject the Final Environmental Impact Statement, uphold your kuleana to mālama ‘āina, and stand with the lāhui in defending the sacred lands of Pōhaku Loa.

Me ka ‘oia‘i‘o,

Orion Kahikina Kupaka Smith

Kailua Kona, Hawai‘i

smithorion33@gmail.com

From: [Uhanehaahaa Smith](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] lease renewed for Pahakuloa
Date: Thursday, May 8, 2025 11:23:05 PM

Aloha, my name is Uhaneha'aha'a Smith and I am 13. I'm from Ka Waihona O Ka Na'auao Public Charter School. I **DO NOT!** I want the lease renewed for Pahakuloa or any other US base on our 'āina. Especially when you are blowing up our land with our Hawaiian cave burials. Hawaiian cave burials are a place to **honor** and **protect** the remains of our ancestors! And You are distorting Hawaiian cave burials with your bombs and grenades and what are you gonna do with our artifact and our ancestors bones?! Give it to us so we can have it. You are killing our land with your bombs and the led in your bullets. I am scared for me and my future kids. I am scared that our land will die. You have 200 acres of land thats 25% of the Hawaiian land! And you have forcefully moved our people out of their homes and land just to bomb it. Thank you for reading my message, and I **DO NOT!** I want the lease renewed for Pahakuloa. Thank you for listening

From: [Robert Soares](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Do not renew Army Lease
Date: Friday, May 9, 2025 7:53:26 AM

Subject Line: Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown."* **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

gives a vague summary. **V2 at E-15 & E-16**

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

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

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

unaccounted-for future scenario.

Mahalo for considering my testimony.

Robert Soares

2532 Sonoma Pl, 96822

Fu_dog_5@yahoo.com

Statement of Solidarity - [Link to Google Form](#)

We, the undersigned, stand in unity to protect Pōhakuloa from continued desecration and destruction by the US Army and uphold the rights of Kānaka Maoli to these ancestral lands which were taken without their consent.

- **We urge the Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (EIS) for the proposed retention of 23,000 acres at Pōhakuloa Training Area.** This environmental review is inadequate. It is missing key information, including biological and cultural surveys; ignores impacts to adjacent federal lands, a clear requirement under state law; turns a blind eye to threats to endangered species and their habitats, impacts to cultural resources and practices, and even the risk of aquifer contamination; and fails to fully describe alternative uses of the leased areas that could serve the public interest. The EIS fails to disclose the degree to which munitions continue to litter public land. The Department of Land and Natural Resources staff submittal itself calls out the Army for repeatedly refusing to address their concerns throughout the EIS process. We are asking the BLNR to stand by its staff, the community, and its mission and reject this poorly written, incomplete, and seemingly bad-faith attempt to disregard Hawai'i's Environmental Protection Act.
- **We urge the BLNR to ensure that future decision-making on any revised EIS and on any other matter concerning Pōhakuloa is held on Hawai'i Island.** Those communities most directly impacted by - and who have the most intimate familiarity with - the lands and activities at issue must be allowed to speak directly to BLNR decision makers regarding what may be proposed for their 'āina and their moku, potentially for generations to come.
- **We urge the BLNR to require full transparency in any discussions and negotiations between DLNR staff and federal officials regarding the proposed military retention of any and all military-leased lands going forward.** This includes regular and timely reporting regarding natural and cultural resources ma uka to ma kai, public and practitioner access, hazards to public health and safety, iwi kūpuna and historic properties, environmental remediation, climate destabilization, land valuations, mechanisms for retention, and alternative uses beyond military activity.

List of organizations who support:

1. 350 Hawaii
2. 50501 Hawai'i
3. ABLE
4. Academic Labor United
5. 'Ahahui o Nā Kauka
6. American party of labor & Kalikasan solidarity organization
7. BDS in Hawai'i

8. Center for Biological Diversity
9. Chamber of Sustainable Commerce
10. Environmental Justice Club at University of Hawai'i at Mānoa
11. Faith Action for Community Equity
12. Flores-Case 'Ohana
13. Global Network Against Weapons and Nuclear Power in Space
14. Greenpeace Hawai'i
15. Harp 'Ohana
16. Hawai'i Committee for Human Rights in the Philippines
17. Hawai'i Alliance for Progressive Action
18. HŌ'Ā LLC
19. Hui Kū Like Kākou
20. Internal Solidarity Movement
21. Justice and Witness Missional Team of the Hawaii Conference UCC
22. Ka Lei Maile Alii
23. Ka Lāhui Hawai'i
24. Ka Malu O Ka Hālāwai
25. Ka Malu O Kahalawai
26. Ka 'Ohana O Na Pua - Nancy Redfeather Executive Director
27. Ka 'Ohana Kahakalauau
28. KAHEA: The Hawaiian-Environmental Alliance
29. Kako'o Kupuna Mahu
30. Kako'o Haleakalā
31. Kanaeokana
32. Keawe 'Ohana
33. Kilakila o Haleakalā
34. King Kamehameha Hawaiian Civic Club
35. Kupuna for the Mo'opuna
36. Kū -A-Kanaka LLC
37. Lahaina Community Land Trust
38. Lahaina Grown
39. Mākua University
40. Mālama Mākua
41. Malu 'Aina
42. Maui Food Not Bombs
43. Maui for Palestine
44. Maui Medics Healers Hui
45. Maui Peace Action
46. Mauna Kea Protectors at UCSB
47. Moon Kine Tingz

48. Nā Hala o Naue
49. Nā Keiki o Ka Mo'i Canoe Club
50. Native Hawaiian Legal Corp
51. Nohopapa Hawai'i
52. Na Kia'i o Pohakuloa
53. Nā Kia'i o Wai Hā
54. Ohana Ho'opakele
55. Pacific Justice and Reconciliation Center
56. Pā Kālai 'Ili
57. Protect Kaho'olawe 'Ohana
58. Pu'uhonua o Wailupe
59. Queens Court
60. Rise for Palestine
61. Shimanchu Mamuyaa
62. Sierra Club Hawai'i
63. Students and Faculty for Justice in Palestine at UH (SFJP@UH)
64. Wahine Apapalani Native Hawaiian Lineal Descendants
65. Waianae Moku Kupuna Council
66. Water Protector Legal Collective
67. Wisdom Circles Oceania

List of Individuals who support:

1. Aechylus Delapinia-Miller
2. Aima Paule
3. Alan Burdick
4. Alison Lewis
5. Allix F Bishop
6. Amanda Akiko Lindley
7. Amara K Ballao
8. Amari Hayes
9. Amber K. Souza
10. Amy Parsons
11. Ana Hernandez
12. 'Ānela Evans
13. Anela Ming-Yue Oh
14. Anne Wheelock
15. Areerat (Aree) Worawongwasu
16. Ashley Colozzi
17. Ashley Corri
18. Ashley K. Obrey

19. Ashley Obrey
20. Avalon Paradea
21. Azra Kameenui Ramirez
22. Bianca Isaki
23. Brent Nagami
24. Bryon Lee
25. Carol Gaylord
26. Carolann Rowe
27. Cassandra Rayne Gross
28. Cassandra Spellman
29. Chancen
30. Christi Maumau
31. Christy K. MacPherson
32. CJ Elizares
33. Clarence Kū Ching
34. Consuelo Gouveia
35. Craig Neff
36. Cynthia Franklin
37. Damien Marie Onaona Trask
38. David Bertino
39. Debbie Hauanio
40. Debra M Javar
41. Diane Choy Fujimura
42. Dottie Lux
43. Dr. Kahala Johnson
44. Eileen Ridge
45. Ella Kalakupua Carson
46. Emma koa
47. Emma McGuire
48. Emmaline Padeken
49. Eric K. Keawe
50. Hauoli Kalama
51. Healani Sonoda-Pale
52. Heather Barfield
53. Henrietta Tudela
54. Hokulani Beale
55. Ikaika Anderson
56. Ila P. Nako
57. Isaac "ika'aka" Nāhuewai
58. Jean Orsolino

59. Jen Lum
60. Jessica Nakamura
61. Jessie Oguma-Miller
62. Jim Albertini
63. John & Lucy Witeck
64. Joshua Lanakila Mangauil
65. Joy Rafael
66. Judith McShane Burke
67. Kahele Dukelow
68. Kahu W. Keoki Kiwaha
69. Kaiea Medeiros
70. Kalae Campbell
71. Kalani Baer
72. Kanoe Morishige
73. Kanoe Pacheco
74. Kathryn Shawhan
75. Kawai Luuwai
76. Kawaikaunu Luuwai
77. Keahi Johnson
78. Kealakai Hammond
79. Keikilani Bright
80. Kekai Kaaumoana-Cummings
81. Kelina Kaaihue
82. Kenji Cataldo
83. Kiri Lou Halmos
84. Koohan Paik-Mander
85. Kristen Young
86. Kristin Osakada
87. Lahaina Grown
88. Laura Saranski
89. Laura Webber
90. Laurie akana
91. Leo Nahe Smith
92. Lindsey Ilagan
93. Lipine Muraki-Griffin
94. Lisa Hayes
95. Lisa Kaaekuahiwi
96. Lia Vanderpoel
97. Lopaka Aiwohi
98. Luna Porras

99. Lyn-Marie Bitanga
100. Lynn Sonoda
101. Madison Owens
102. Mahina Martinson
103. Makanoë Hufana
104. Malia Sing
105. Mana Chong
106. Maribeth Joy
107. Mariela Vasquez
108. Mary Marvin Porter
109. Matthew Oostra
110. Mele Stokesberry
111. Melisa A
112. Melodie Aduja
113. Michael Kaukaohu Trask
114. Michele Hanapi-Auna
115. Mililani Trask
116. Moani Tiare Atay
117. Momi Greene
118. Momi Wheeler
119. Morgan Dobbins
120. Nana-Honua Manuel
121. Nancy Aleck
122. Nicki Tedesco
123. Noelani Mengel
124. Nākai‘elua Villatora
125. Ohana Ho‘ŏpakele
126. Patricia Blair
127. Peggy Gwi-Seok Hong
128. Presley Ah Mook Sang
129. Puamana Crabbe
130. Regina E Gregory
131. Representative Amy Perruso
132. Representative Mahina Poepoe
133. Representative Tina Nakada Grandinetti
134. Richard Rothschiller, Psy.D.
135. Rik Masterson
136. Rosa Villarroel
137. Roxie Sylva
138. Sandra Stevens

139. Sanoe Iaea
140. Sarah and Patrick Burns
141. Sarah Rosa
142. Seolhae Kim
143. Shane Veincent
144. Shannon Rudolph
145. Shantee Brown
146. Shelley Tamekazu
147. Shiu Mei Bassette
148. Simon Bitanga
149. Snow Marks
150. Stacy Cortez
151. Summer Puaonaona Noland
152. Summer Yadao
153. Suzanne Freynik
154. Tamlyn Hunt
155. Tanya Yamanaka Aynessazian
156. Tapu Hanapi
157. Tara Rojas
158. Taylor Warner
159. Teani Marquez
160. Teresa L. Nakama
161. Tiare Lawrence
162. Toni A. Travis
163. Wallace Kohashikawa
164. Wendell Au

From: [Emma Stierhoff](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 12:01:43 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and under ambiguous conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

b. The Army said there's no significant impact because low rainfall means the contamination won't spread much and the aquifer is deep. But the Army also concedes "shallower aquifers" were supposed to be tested, but weren't. It's unacceptable to claim there is no significant impact without evidence as areas that are more likely to be affected haven't been studied. **V1 at 3-193**

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it?* In response to these questions, the Army refers to FEIS section 3.5.6, which says “cleanup and restoration . . . are not part of the Proposed Action” and “future cleanup and restoration requirements, standard processes, and associated cost are unknown.” **V1 at 3-122**

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

c. The Army said it will comply with the “Comprehensive Environmental Response, Compensation, and Liability Act” (CERCLA), which requires remedial action concerning stored hazardous substances, “necessary to protect human health and the environment with respect to any such substance remaining on the property has been taken before” transferring the land back. However, the Army will not be clear on what this will mean, changing its stance on whether it stores hazardous substances on state lands (see #3c) and refusing to disclose any remediation actions. This suggests no clear intent or plan to comply with the CERCLA.

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated nor the impacts of contamination.

c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request

for the information, (2) deleting the section describing hazardous waste storage on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might

lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

a. The FEIS only considers impacts of continuing military training on 22,750 acres of State lands, even though these training operations are inextricable from the entire 132,000 acres of PTA. What are the true cumulative impacts of these operations? How does PTA as a whole impact Hawai‘i’s economy? Housing availability? When most of Hawai‘i’s threatened and endangered species are found on these lands, how are they being impacted?

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

(8) Fire impacts are worse than disclosed.

a. Between 1975 and August 2024, there were 1,261 fires of which 1007 fires were due to military activities. **V1 at 3-283**. Military training is extremely risky in a fire prone location like Pōhakuloa, yet, the Army rejects proposals to relocate training - only mitigation for monitoring fires and inhibiting invasive grass growth.

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire”. **V2 at D-214**. Palila populations have drastically declined in the last decade due to habitat loss and improper mitigation from PTA in the past, and we must prevent any further harm.

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands.

b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.” **V1 at 4-16** However, this conclusion is drawn without any data to support it.

(10) Existing mitigation proven insufficient by ongoing impacts.

- a. The FEIS concedes ongoing impacts from past PTA operations - which the Army proposes to continue indefinitely. **V1 at 4-11 - 4-25**
- b. Proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.
- c. For all other impacts, the Army will just continue existing mitigation measures. But these are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. **Submittal at 23**
- d. The FEIS excluded many lands from its survey of historic properties, including iwi kupuna, on state lands. **V1 at Fig. 3-8** How can the Army assess impacts to cultural resources if it has not even surveyed the land for such resources?

Far from providing a comprehensive reference, the Army's FEIS obstinately refuses to disclose the foreseeable harms their actions will cause to Hawai'i's land, water, cultural resources, and its people. If the Army does not know the impact, and has no discernable plan to mitigate such impacts, the Board should reject the FEIS and require the Army to conduct necessary investigations as part of this environmental review process. The FEIS must present actual data indicating lack of potential harm in the aforementioned areas, and where environmental harm cannot be prevented, the Army must have a clear plan for mitigation of harm. Until these criteria can be met, I urge the Board to reject the FEIS.

Mahalo for considering my testimony,
Emma Stierhoff

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Emma Stierhoff (she/her)
Ecological Research & Outreach Technician
Liko Nā Pilina: Hybrid Ecosystems Project
University of Hawai'i at Hilo

From: [Mahealani Tennant](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] PETITION PROTECTING PŌHAKULOA
Date: Thursday, May 8, 2025 10:19:16 PM

*Aloha e Chair Chang and Members of the Board of Land and Natural Resources,
My name is Lana Māhealani 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.

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

Mahalo nui for the opportunity to testify.

Sincerely,

From: [mele tio](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Final EIS Testimony
Date: Friday, May 9, 2025 8:03:43 AM

Aloha,

My name is Kumelewaioluopaliuli Tiogangco. I am a Kanaka Maoli of the Hawaiian Kingdom of Hawaii nei. My grandma Elizabeth Pakele Akamu-Maele was 100% Hawaiian and she is still fighting with me today. I am in full opposition for the EIS for Pohakuloa.

Mahalo nui,

Kumelewaioluopaliuli Tiogangco

From: [Melissa Tomlinson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] D-1 Acceptance/Non-Acceptance of FEIS
Date: Friday, May 9, 2025 6:03:03 AM

Aloha kakahiaka, Good morning Board of Regents,

I realize my written submission is not "in time", I hope you will still consider it. There's plenty I want to say and the most important, at this time, is to say Kū Kia'i Pōhakuloa! I urge you to reject the Army's fraudulent EIS. Not only is it lacking, it is lying. Do you have anything to verify it's not? Is there any accountability? I have written testimony before and still adamantly declare that the Army needs to leave Pōhakuloa. First, because of the illegal occupation of Hawaiian lands and continuing because all the harm they have caused 'Āina, Kānaka, really all life on the islands and future generations coming. Such sacred Lands deserve and must receive Malama 'Āina. The desecration is incomprehensible. I stand with the many people that have written in and will be speaking to you today to implore you to reject the EIS. I find it insensitive that the meeting today isn't being held on the island that is most impacted by your decisions. Yes, the whole Pae 'Āina, so every Kānaka can have an opportunity to be heard and especially Moku O Keawe,, especially first.

There's much I've been wanting to clarify and take accountability for when I provided testimony over the phone years ago regarding, i think it was permit approval for TMT. At that time, I was in a watch party, while in the waiting room to give testimony, on my phone. Another Kanaka, Kiara Lorenzo-Rodrigues was in the watch party and was also on the phone in the waiting room and she had even emailed within the proper time to provide testimony. Both of us were not heard prior to a vote. Tara Rojas was in the zoom meeting and was in our watch party and was able to communicate there is still someone in the waiting room. My phone line opened up and I was fuming pretty bad at that point. Years of witnessed oppression in Hawaii overflowed emotion from my mouth. I also felt at a loss of my words. So full of anger I couldn't even remember Wayne Tanaka's name, though i knew it. I vaguely recall learning shortly after that right now the entire board is Kānaka. The wrong decision was made that day I got so hot with you all. I hope today you commit to honoring your Kūpuna and your people, that you commit to protecting Pōhakuloa and reject the EIS. Too often we are seeing harmful decisions. Too often we are seeing systematic racism and silencing of Kānaka Maoli/'Ō'iwi, and the Lāhui at large.

When I witnessed Kalani Flores discuss his 38 page submission of all the reasons that permit should have been rejected and then several other Kānaka share there personal connection and really Kū'ē, oof still breaks my heart. I mean 38 pages ! The dedication and honoring involved to provide so thoroughly that the number of Kūpuna arrested on the ala was represented. It felt like How could you, how dare you! I know you're going to be privy to such artistic declarations today. Personally, I don't know how or why anyone could deny Auntie Maxine let alone the many others and the many other that won't be able to testify today. I wish I could be there in person and I wish I could have said this to you all, at the least, with my face on Zoom, but I start work in right now. The world is watching you today, shoots the whole uni-verse. Lift us up!

Regards,

Melissa Tomlinson
Lafayette, CA

From: [Ka'iana](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa EIS
Date: Thursday, May 8, 2025 10:50:46 PM

Aloha Commisioner Dawn Chang,

I am writting in regards to Pohakuloa training area Final EIS. I strongly urge you to reject the EIS. It is clear, in this instance that you are responsible for upholding the Quality and life of our resources. The United States military has violated their responsibilities in safely managing the land and resources leased to them by the state of Hawaii. This lease must be terminated immediately. It is ridiculous to think that such a lopsided lease can exist. Why is there a diferent set of rules for the U.S. military? How can you allow them to destroy and pollute resources without accountability. This is the reason why we need immediate change and the discontinuance of the military lease at Pohakuloa Training center. We have seen what has happaned to red Hill in Honolulu. Why are we letting The Military Bomb and polute our source of Wai. This is completely rediculous and a shame that this division has allowed this to go on for decades. Please stop the desicration on our beloved 'Āina and resources.

Kaiana Trask

[Sent from the all new AOL app for iOS](#)

Testimony Opposing the U.S. Army's Environmental Impact Statement (EIS) and Long-Term Lease at Pōhakuloa
Submitted to the Board of Land and Natural Resources (BLNR)

Aloha Chair and Board Members,

My name is Monica Pilimai Traub, and I am an educator and resident of Hawai'i Island. I raised my two daughters in Ka'ū, grounding them in 'ike kupuna through the Hawaiian language and culture at Ke Kula 'o 'Ehunuikaimalino. Our 'ohana maintains ancestral ties to Kohala, and we continue to live in a way that honors our relationship with 'āina. From this deeply rooted perspective, I submit my strong opposition to the Army's Environmental Impact Statement (EIS) and its proposal to extend its lease at Pōhakuloa.

Pōhakuloa is a wahi pana—a sacred and storied place home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. The Army's past actions have caused irreparable harm, including the burning of nearly 20,000 acres, much of which included critical habitat for native plants and animals. Such destruction is unacceptable.

The Army continues to conduct live-fire training and bombing, activities that contaminate the land, endanger water sources, and degrade the area over time. The EIS fails to provide a sufficient plan to mitigate these impacts. Given the Army's long-standing failure to clean up military debris and its poor record of environmental stewardship, it is unrealistic to expect compliance with conservation district regulations.

In *Kahaulelio v. DLNR (2019)*, the Hawai'i Supreme Court made it clear: the State has the highest duty to preserve and protect trust lands—a responsibility rooted in the constitutional obligation to mālama 'āina. This duty is proactive, requiring action even without proven violations.

The Court found the State failed its responsibilities at Pōhakuloa by not properly monitoring military use, not ensuring cleanup, and not responding in a timely and transparent manner. To continue the lease would be to repeat this failure and further violate the public trust.

Pōhakuloa is conservation land, and there is no compatible military use that aligns with this designation. The Army's continued occupation and destruction of the area through bombing, construction, and contamination contradict the purpose of conservation zoning and threaten native flora, fauna, and cultural sites. The EIS does not outline any real or enforceable mitigation efforts to protect these resources.

As a mother, cultural practitioner, educator, and a descendant of this land, I urge the Board of Land and Natural Resources to reject the Army's EIS and deny the lease extension. It is time to uphold the State's trust responsibilities and allow Pōhakuloa to begin its healing, free from further military desecration.

Sincerely,

Monica Pilimai Traub



Resident, Hawai'i Island
92-9064 King Kamehameha Blvd
Ocean View, Hawai'i 96737

From: [Olivia Turner](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Request to reject FEIS regarding PTA
Date: Friday, May 9, 2025 12:40:45 AM

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

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai‘i Island. This FEIS fails to meet the basic requirements of Hawai‘i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army’s final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

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

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

Sincerely,

Olivia Turner

From: [Vernon Viernes](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakuloa
Date: Friday, May 9, 2025 12:40:15 PM

Please deny military EIS for Pohakuloa because they haven't malama/stewart/taken care of it up to now. How can we give them the 'aina for \$1 when millions of dollars environment/'aina damage has been done, not cleaned up and damaged for generations? Just like Kapukaki/red hill damaging wai/water table for Oahu too much neglect and damage done already. How do they intend to clean up Pohakuloa what plans in place to do that? Take, take, take but not give back or restore. Military are guests here, you don't go to someone's house and cause damage and destruction without retribution or compensation. Military oath says to defend US and constitution against ALL enemies foreign and domestic...Hawaii and its people not the enemies. We aloha and been gracious for so long without reciprocity, courtesy or consideration of any kind. Lawa/enough already. Take care of Pohakula and 'aina. No to \$1 renewed lease.

From: [Noelani Wahilani](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Friday, May 9, 2025 8:30:32 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it?* In response to these questions, the Army refers to FEIS section 3.5.6, which says “cleanup and restoration . . . are not part of the Proposed Action” and “future cleanup and restoration requirements, standard processes, and associated cost are unknown.” **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous waste storage

on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels". **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the "entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021." **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions ("GHGs") for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

Submittal at 23

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

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

Mahalo for considering my testimony.

Purdyka Wahiani

From: [Heidi Waia mau](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 – Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area Date: May 9, 2025
Date: Friday, May 9, 2025 8:27:20 AM

Aloha Chair Chang and Members of the Board,

My name is **Heidi K. K. Waia mau**, and I am a **kanaka ‘ōiwi, educator, and environmental advocate from Hawai‘i Island**. 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 admits to a legacy of contamination at Pōhakuloa Training Area, including **lead, RDX (a military explosive), diesel, dioxins, petroleum hydrocarbons, and other munitions-related residues**. Despite this, the document provides **no enforceable cleanup strategy** or transparent monitoring plan for known hazardous sites. It fails to disclose how contamination migrates through **shallow soils and fractured basalt**, which are key pathways to **Hawai‘i Island’s freshwater aquifers**, including the **Ke‘āmuku area’s recharge zone**.

EPA comments have noted the lack of detail on **long-term site characterization, cumulative exposure data**, and remediation commitments. No timeframe, budget, or accountability mechanism exists for the removal of toxins known to harm human and ecological health.

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.

I ASK THAT YOU REJECT THIS EIS. PROTECT OUR ‘ĀINA AND 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‘iō,

Heidi K. K. Waiama

Hawai‘i Island

Kanaka ‘ōiwi, Educator, Environmental Advocate

From: [Shawn White](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Calling on BLNR to Reject the Army's FEIS: Unanswered Questions and Ongoing Harms at Pōhakuloa
Date: Thursday, May 8, 2025 11:30:26 PM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i Island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision-making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

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

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

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

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

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

b. The FEIS is inconsistent on this issue. It discloses there are

“potentially complete exposure pathways for human receptors from contaminants within the State-owned land surface soils” but because the same is not true for water and sediment, contaminants are “unlikely to impact public health.” **V1 at 3-107**

c. The FEIS acknowledges “airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels”. **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the “entire population of Palila are restricted to the west slope of Mauna Kea and is extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021.” **V2 at D-214**

(9) No disclosure of greenhouse gases

- a. The EIS discloses the Army does not have data on its greenhouse gas emissions (“GHGs”) for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?
- b. At the same time, the FEIS concludes the Army’s “generation of GHGs has not meaningfully contributed to the impacts of global or local climate change.” **V1 at 4-16** How can it reach this conclusion if it does not have data?

(10) Existing mitigation proven insufficient by ongoing impacts.

- a. The FEIS concedes ongoing impacts from past PTA operations - which the Army proposes to continue indefinitely. **V1 at 4-11 - 4-25**
- b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.
- c. For all other impacts, the Army will just continue existing mitigation measures. But these are not working because impacts continue to accrue, particularly to cultural resources as pointed out by Land Board staff who disagree that Army cultural resource programs are protecting these resources. **Submittal at 23**
- d. The FEIS excluded many lands from its survey of historic properties, including iwi kupuna, on state lands. **V1 at Fig. 3-8**How can the Army assess impacts to cultural resources if it does not even know if they are there?

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

Mahalo for considering my testimony.

Shawn M White

From: janalynwiley@aol.com
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Pohakulaoa hearing
Date: Friday, May 9, 2025 5:21:24 AM

5/9/25

To the BLNR:

I do not support the Army's blantant disregard of fulfilling their EIS duties. They propose to use 22,750 acres of currently contaminated land over an undetermined period of time for "training". Anywhere they train, they contaminate the land. I know this as I live next door to the 2nd largest military base in the US. The heavy metals have and do get into the aquifers, and are continuously deposited upon the earth and in our lungs. There is a lot of research on this going all the way back to the older book written by Dr. Witten, years back. The military ignores this.

Please deny their request. MAKE THEM TEST THE SHALLOW AQUIFERS, WITH COMMUNITY MEMBERS IN ATTENDANCE. MAKE THEM DO A THOROUGH EIS THAT WILL SHOW THIS IS NOT GOOD FOR HAWAII. Not doing so will condemn your lands and waters forever. Note it is shown that toxins from munitions and aircraft do travel far on prevailing winds. Is this addressed?

Sincerely,

Jana Wiley, Olympia, WA
An admirer of your beautiful island and aloha spirit.

May 9, 2025

Terrill James Kane Alii Williams, MBA

Testimony for Agenda Item D-1: Regarding FEIS for Pohakuloa Training Area

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

I am writing as a lineal descent of Maunakea via my great-great-great-great-great grandmother Keaouli Kapalehua (w) of Ni'ihau, through her mother Palea (w), back to King Kamehameha I (k), back to the marriage of Kukahau'ula (k) and Lilinoe (w) --- Please refer to Exhibits 1-9 regarding the documentation of my mo'oku'auhau (genealogy). I am requesting for the FEIS that has been put forward in Agenda Item D-1 to be REJECTED.

Due to my genealogical tie to Kukakahu'ula (k) and Lilinoe (w), ancestors whose stories have been well-documented regarding Maunakea, I am one of many Kanaka Maoli who have direct kuleana (responsibility and rights via inherited bloodline and lineal descendancy) to Maunakea and therefore to matters concerning Pohakuloa at Maunakea. As a lineal descendant, I was not contacted nor consulted at any point by the US Army regarding this FEIS for Pohakuloa; the Ka Pa'akai Analysis is incomplete. Additionally, I was not contacted regarding the funerary objects that were discovered by the US Army; the US Army has not done its due diligence and has been negligent in notifying all lineal descendants in a timely manner and also failed to disclose any information in the FEIS. That was a deliberate failure by the US Army to disclose pertinent information --- a significant find --- concerning the cultural, archaeological, and religious significance of Pohakuloa to the Kanaka Maoli people that in turn has become an attempt to corrupt the decision-making by the BLNR under the guise of claiming that supposedly "lineal descendants asked that it not be included in the FEIS". As a lineal descendant, I have a right to know who was consulted in the process and who has been speaking on my behalf. Furthermore, any future discussions about Pohakuloa are supposed to include myself and other lineal descendants of Maunakea.

It is not acceptable for the US Army to edit the EIS and resubmit it; this is clear indication that the US Army does not value transparency, is incapable of operating in good faith, and therefore lacks what is necessary for the responsibilities of land management in Hawaii nei. The further leasing of Pohakuloa is not acceptable. Furthermore, by law, the BLNR and US Army are required to consult with the Hawaii State Aha Moku, who in turn is required to consult with cultural and lineal descendants; this also has not occurred. The BLNR cannot move forward in making a decision of approving this FEIS due to the legal ramifications and liabilities.

My testimony here does not constitute as the proper consultation process that was and is to occur by law. Lineal descendants should always have a say in the outcome of all things concerning the kupuna (ancestors) of that ancient land that very few people can claim to be lineal descendants through Kukahau'ula (k) and Lilinoe (w) and that we are alive today is a testimony to the reason why we submit our mo'oku'auhau (genealogy) to claim what is rightfully ours.

I reiterate as a lineal descendant who has yet to be consulted, that the FEIS in Agenda Item D-1 be REJECTED.

Mahalo,

Terrill James Kane Alii Williams, MBA

Kapalehua 'Ohana

Lineal Descendant of Kukahau'ula (k) and Lilinoe (w) at Maunakea

tkanealiw@gmail.com

Exhibit 1: Genealogical Chart

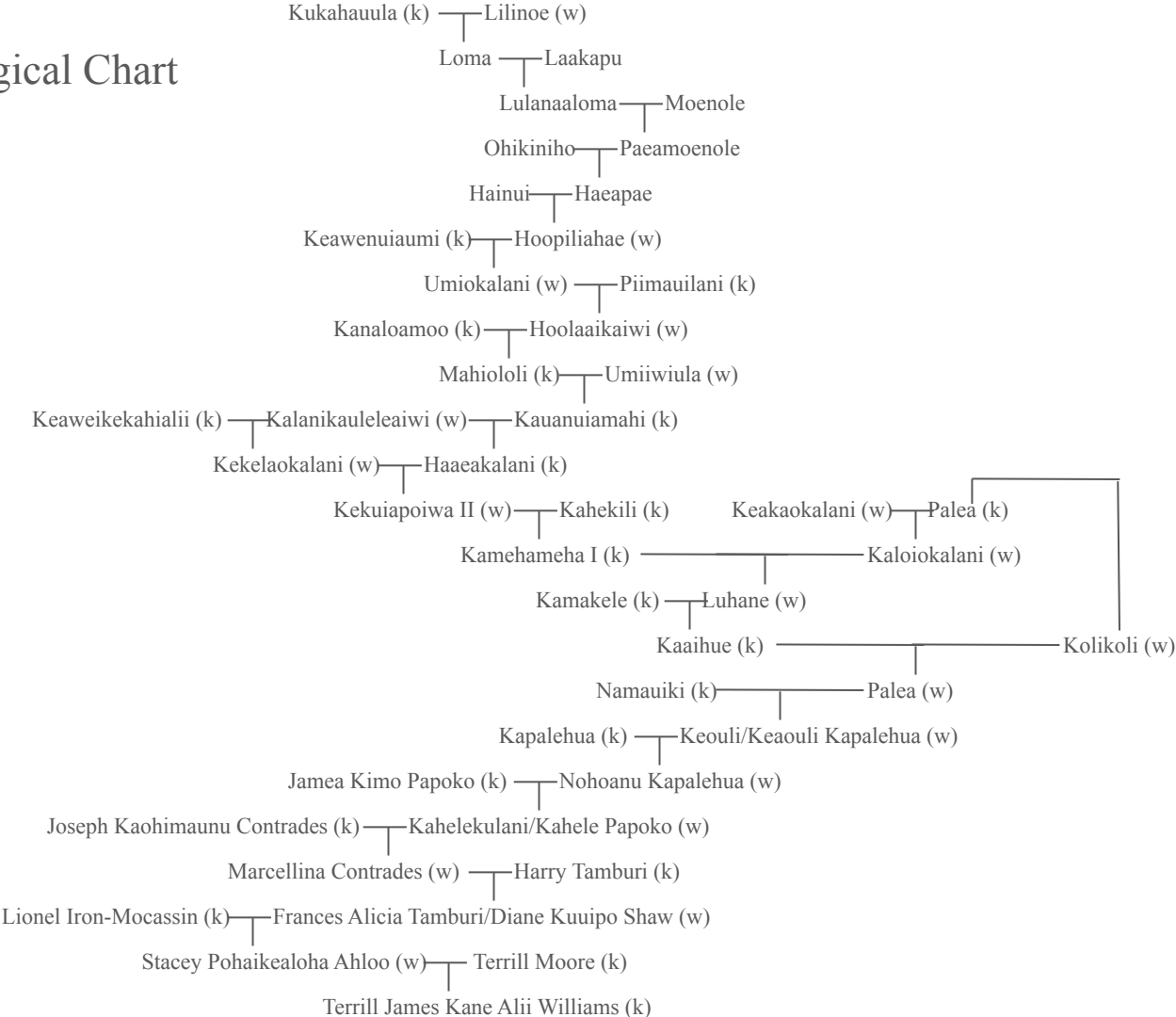


Exhibit 2: Marriage of Kukahauula (k) and Lilinoe (w) and Genealogy down to Hoopiliahae (w)

[Ka Nupepa Kuokoa](#) / Ka Nupepa Kuokoa, Volume XVII, Number 14, 6 April 1878

Issue

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hoopiliahae



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Loma, Loma noho ia Laakapu
hanau o Lulanaalomakahauula,
Lulanaalomakahauula noho ia
Moenole hanau o Paeamoenole,
Paeamoenole noho ia Ohikiniho
hanau o Haeapae. Haeapae noho
a Hainui hanau o **Hoopiliahae**, i
noho aku ai ia Keawenuiaumi loa
o Lonoikamakahiki, na ke mele i
nooholo loa 'ku o



ho ia Paepae hanau o Kukahauula, Kuka-
hauula noho ia Lilinoe hanau o Loma, Lo-
ma noho ia Laakapu hanau o Lulanaaloma-
akahauula, Lulanaalomakahauula noho ia
Moenole hanau o Paeamoenole, Paeamoen-
le noho ia Ohikiniho hanau o Haeapae. Ha-
eapae noho ia Hainui hanau o **Hoopiliahae**,
i noho aku ai ia Keawenuiaumi loa o Lo-

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Exhibit 3: Genealogy of Hoopiliahae (w) down to Umiokalani (w)

Ka Nupepa Kuokoa / Ka Nupepa
Kuokoa, Volume XVII, Number 9, 2
March 1878

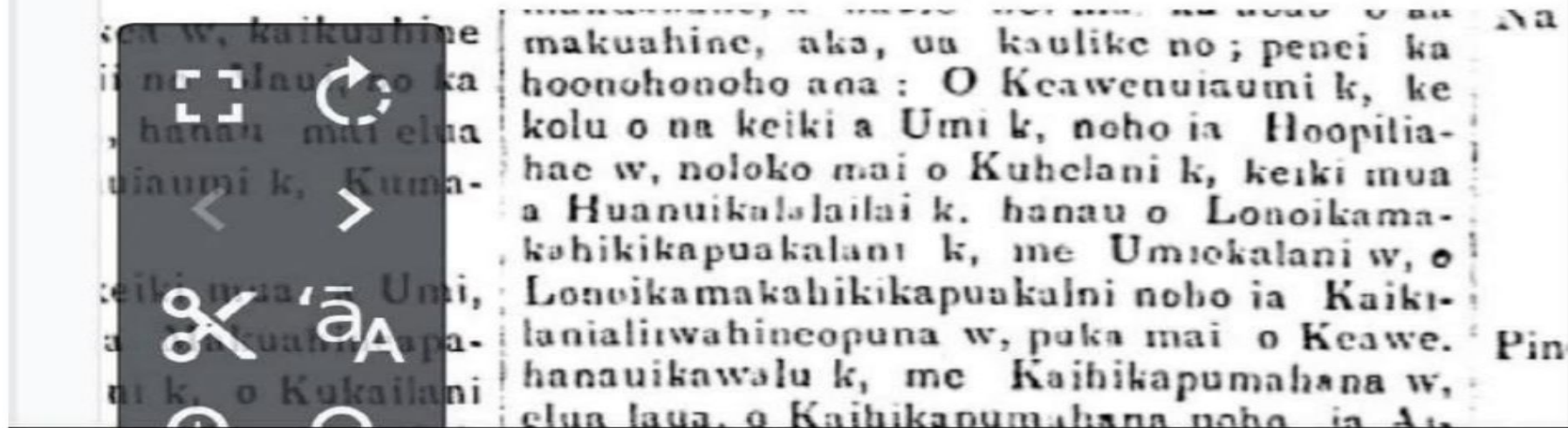
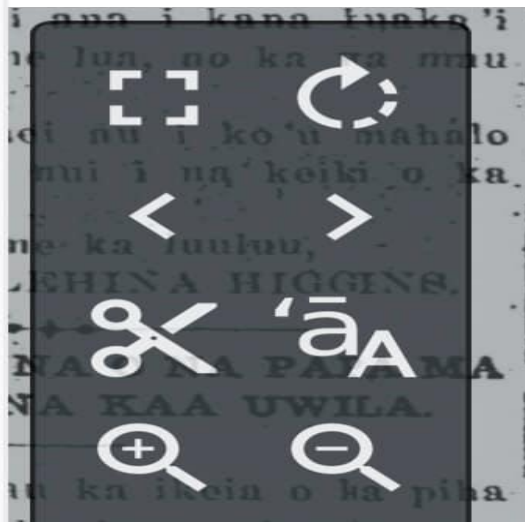


Exhibit 4: Genealogy of Umiokalani (w) down to Hoolaaikaiwi (w)

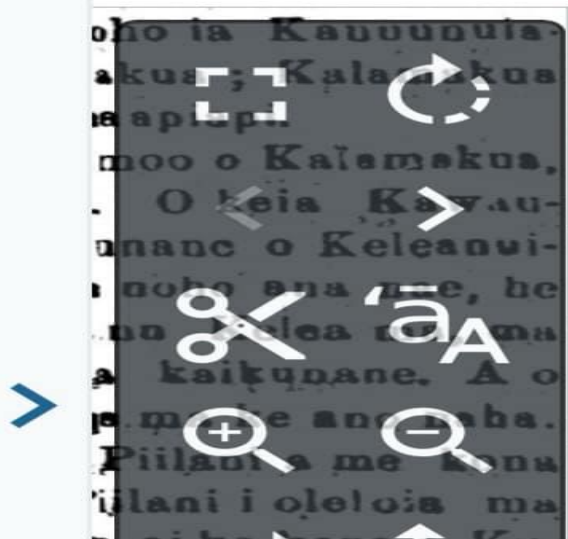
Ka Nupepa Kuokoa / Ka Nupepa Kuokoa, Volume LVII, Number 43, 24 October 1919



paa no ia makou ka mookuaubau.
Liloa moe ia Akahiakuleana, hanau o
Umi; Umi moe ia Kapulani, hanau o
Keawenuiaumi; Keawenuiaumi moe ia
Hoapilia-Hae, hanau o Umiokalani;
Umiokalani moe ia **Piimaui-lani**, hanau
o Hoolaaikaiwi; Hoolaaikaiwi moe ia
Kanalaloauoo, hanau o Hikikanaloauoo;
Hikikanaloauoo moe ia Lonoanahulu,
hanau o Manohili; Manohili moe ia Ha-
lao, hanau o Kanoena; Kanoena moe ia
Keawepoepoe, hanau o Kameeiamoku;
Kameeiamoku moe ia Kamakahehikuli,

Exhibit 5: Genealogy of Hoolaaikaiwi (w) down to Mahiololi (k)

[Ka Nupepa Kuokoa](#) / Ka Nupepa
Kuokoa, Volume XIII, Number
50, 12 December 1874



O Paesmoonole, hoao me Ohikinibo, hanau o Kukukalanopae, Kahema'pae, Haeapae, Ulupo. Kaesapae hoao me Hoiuswai-ku, hanau o Paiohae, Hoopilihae. Kenwenuianmi, hoao me Hoopilihae, hanau o Umiokalani, Keswepaikanaka, Laliloa, Hoolaaikaiwi; Hoolaaikaiwi hoao me Kanaloamoo, hanau o Mahikuku, Mahiololi.

Hoolaaikaiwi, hoao me Kanaloamoo, hanau o Mahikuku, Mahiololi; Mahiololi hoao me Kanekukailani, hanau o Ikuana, Umiulaikaahomau, Umiainaku.

Exhibit 6: Genealogy of Mahiololi (k) down to Kamehameha I (k)

[Ka Nupepa Kuokoa](#) / Ka Nupepa Kuokoa, Volume XIV, Number 2, 9 January 1875

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... o Keawepaaikanaka, Lililoa a me Hoolaaikaiwi w, noho ia Kanaloauoo k, hanau o Mahikukuku. o Mahiololi a me Mahiopeleha. O Mahikukuku, noho ia Akahiakauabikilani, hanau o Hou. A o Mahiololi hoi kai noho ia Umiiwiula hanau o Kauauanuiamahi. O Mahiope-

← [List Icon] →

o Keawepaaikanaka, Lililoa a me Hoolaaikaiwi w, noho ia Kanaloauoo k, hanau o Mahikukuku. o Mahiololi a me Mahiopeleha. O Mahikukuku, noho ia Akahiakauabikilani, hanau o Hou. A o Mahiololi hoi kai noho ia Umiiwiula hanau o Kauauanuiamahi. O Mahiope-

[Ke Au Hou](#) / Ke Au Hou, Volume II, Number 19, 10 May 1911

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kuahine: O Kalanika'uleleieiwi w. i hoike mua ia ae la, noho he kane hou oia o Kauauanuiamahi, hanau o Ha'ae k.; o Ha'ae k. noho ia Kekelaokalani w., hanau o Kekuiapoiwa ka luau makuahine o Kamehameha I.

← [List Icon] →

kuahine: O Kalanika'uleleieiwi w. i hoike mua ia ae la, noho he kane hou oia o Kauauanuiamahi, hanau o Ha'ae k.; o Ha'ae k. noho ia Kekelaokalani w., hanau o Kekuiapoiwa ka luau makuahine o Kamehameha I.

Exhibit 7: Marriage of Kamehameha I (k) and Kaloioikalani (w) tracing down to Kaaihue (k)

[Kamehameha's twenty-seventh child] [died young].

v. Nanaulu (w) was born in O'ahu, KOH;

[twenty-eighth child] [died young].

Kaloioikalani (w) married Kalokuokamaile (k), son of Keōuakupuapāikalani nui (k) and Kahikikalāoalani (w). She was also known as Kalo (w).

The four known children of Kamehameha I [1795-1819] and Kaloioikalani (w) all born in Kingdom of Hawai'i were as follows:

19. i. Luhane (w)2 married Kamakele (k).

ii. Kalanialii'i (k) was born; [Kamehameha's thirtieth

49. i. John Keōua Pi'imoku3 Ha'alo'u married Koloakea Māhoe.

19. Luhane (w)2 (1 Kamehameha I) was born in Kingdom of Hawai'i; [Kamehameha's twenty-ninth child]. She married Kamakele (k). The five known children of Luhane (w)2 and Kamakele (k) were as follows:

50. i. Ka'aihue (k)3 married Ka-luawai-o-ahukini (w).

Printed on: 16 Feb 2011

Prepared by:

J. B. a. u. t. i. s. t. a. C. e. r. t. i. f. i. e. d. A. r. c. h. i. v. e. s.
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DESCENDED FROM THE COUNT OF MAKAWAO

Makawao, June 27th, 1907.

Editor Advertiser:—Will you please to put this few word in your papper. One of the high rank of Maui pass away.

On the -th night, 10 P. M., Mrs. Kaohu Mahiluleima Kanana, died of old age 83. She is one of the high rank of Maui she is the great great grand daughter of Palea (k) count of Makawao and Keakaokalani sister of Kamakahukilani (w) chiefss of Kula unahihewaikahee Palea (k) Keakaokalani (w) comes Kaloioikalni (w) Paiaulani-Pololu, (k) one of the Kamehameha I Pukaua from Hawaii while Kamehameha I on Maui forting Kapakahili one of the strong man on Maui at Ha-

Exhibit 8: Genealogy of Kaaihue (k) down to Palea (w), daughter of the sister of Palea (k)

Palea had 5 children - all now dead, - not one living. Haahoe is the son of his youngest child. The sister of Palea was the mother of that woman now pres. Palea v. - her mother is now dead - I buried her. - she had also a son who is dead.

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ame Palea (w); a o Kaaihue (k)
Lui' Ka Makua Kane o Palea (w), ua
pono ole Kina hana i' Kana Ka
Kamahine Ipiio ia Palea (w)
Molaila, W. noi' aku nei
Ka mea hoopii, e Kahoia, a e

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124. **Kaiakea (k)**¹⁰ High Priest and King of Moloka'i (⁹ *Kūkūlaniho'i Lū'a'e (k)*, ⁸ *Kanehoalani (k)*, ⁷ *Kuikai (k)*, ⁶ *Kalaikiiki (w)*, ⁵ *Keali'iokalani (w)*, ⁴ *Kanaloa-kua'ana (k)*, ³ *Keawenui-a-'Umi (k)*, ² *Kapukini (w)*, ¹ *Liloa (k)*) was born circa 1720. He married **Kalanipo'o-a-Peleioholani (w)**, daughter of **Peleiohōlani (k)** Chief of O'ahu and **Kukuimakalani (w)**. He married **Kahea Makelua (w)**, daughter of **Ho'olu'a'e (k)** and **Kaneala'e (w)**. He married **Kanemahinui (w)**. He died circa 1819. He married **Kalanimanuia (w)**. The Poepoe biography mentions that **Kaiakea (k)** was **Kamehameha I's** counselor on battle strategy, which may explain the following report:

37

"**Kamehameha** looked upon **Kaiakea (k)** as sort of a father figure, grandfather or elder. He paid him the greatest respect he paid to any man. When **Kamehameha I** came to Moloka'i in 1819, on his return to Kona, he removed his clothing and crawled on his belly to the old **Kaiakea (k)**. At this meeting **Kaiakea (k)** was in failing health. He died shortly after this meeting and it is possible **Kamehameha** took this way to show his great love and respect for the beloved sage." [Lee, Pali Jae Lee and Koko Willis, 1987, *Tales from the Night Rainbow*, p. 92 based on Beckwith, Martha W., *Hawaiian Mythology*, 1970]

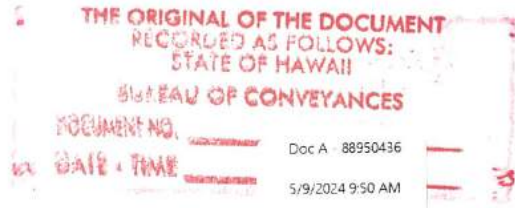
"**Kaiakea (k)** was a wise counselor in ancient time in his occupation taught by his grandfathers from **Kapouhiwaokalani (k)** to the sons, **Mahinuialalani (k)** and **Kauauanuiahahi (k)** and **Kuikai (k)** on down to **Kukalanihoouluae (k)** the own father of **Kaiakea (k)**". [Ka Nupepa Kuokoa, July 25, 1902 in McKinzie, Edith K., *Hawaiian Genealogies*, 2:92]

Uncle of Kamehameha I.

Known children of **Kaiakea (k)**¹⁰ High Priest and King of Moloka'i and **Kalanipo'o-a-Peleioholani (w)** were as follows:

- i. **Palea (k)**¹¹.
- ii. **Kaouioikalani (k)**.
- iii. **Kuluehu (k)**.
- 190 iv. **Kekuelike (k)** married **Kapakakea (w)**.
- v. **Kolikoli (w)**.

Exhibit 9: Affidavit of Genealogy of Terrill James Kane Alii Williams (k) Tracing back to Keouli/Keaouli Kapalehua (w) whose mother Palea (w) is named in Certified Copy of Probate No. 371 of KAUAKAHI (included in Affidavit)



LAND COURT REGULAR SYSTEM
(AREA ABOVE RESERVED FOR RECORDING INFORMATION)

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Terrill James Kane Alii Williams
P.O. Box 790172
Paia, HI 96779

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LAND COMMISSION AWARD:
ROYAL PATENT: 1615

This document consists of 39 pages.

State of Hawaii
County of Maui

This instrument was made on the 8th day of May in the year 2024 by Terrill James Kane Alii Williams who resides at P.O. Box 790172, Paia, HI 96779 upon first duly sworn desposes and sayeth:

First I, Terrill James Kane Alii Williams, am of lawful age and competent; and was born on September 20, 1996 as proven by Birth Certificate (Exhibit A1/Mea A1)

Second That Staceydee Pohaikaloa Ah Loo is my mother and was born on January 20, 1970 proven by Certification of Live Birth (Exhibit B1/Mea B1).

Third That Diane Kuuipo Shaw, born on October 24, 1943, is the mother of Staceydee Pohaikaloa Ah Loo proven through Certification of Live Birth. (Exhibit C1/Mea C1) and therefore is my Grandmother.

Fourth Diane Kuuipo Shaw was adopted from her biological mother, Marcellina Contrades, and her original name was Frances Alicia Tamburi as shown in Amended Birth (Exhibit D1/Mea D1) and Birth Record (Exhibit D2). Marcellina Contrades therefore is my great grandmother.

Fifth That Kahele Papoko is the mother of Marcellina Contrades proven by Delayed Certificate of Birth (Exhibit E1/Mea E2) and Record of Issue of License to Marry (Exhibit E2/Mea E2) and therefore is my great great grandmother.

Sixth That Nohoanu Kapalehua is the mother of Kahele Papaoko proven by Record of Death (Exhibit F1/Mea F1) and therefore is my great great great grandmother.

Seventh That Keaouli Kapalehua is the mother of Nohoanu Kapalehua proven by Death Probate (Exhibit G1/Mea G1) and therefore is my great great great great grandmother.

Eighth That Keaouli Kapalehua was also known as Keouli as proven by Marriage Certificate (Exhibit H1/Mea H1) and Record of Marriage (Exhibit H2/Mea H2).

Ninth That Namauike is the father of Keouli proven by Death Probate (Exhibit I1/Mea I1) and therefore is my great great great great grandfather.

Tenth That Kelekau is the mother of Namauike proven by Death Probate (Exhibit I1/Mea I1) and therefore is my great great great great great grandmother.

Eleventh That Kelekau was next-of-kin as first cousin to Papapa. Nieke is the mother of Kelekau, Palauakeke is the mother of Papapa. Nieke is the younger sister of Palauakeke by the same parents, Waha is the father and Namue is the mother, proven by Death Probate (Exhibit I1/Mea I1)

Twelfth That Papapa is the awardee Royal Patent 1615 proven by certified copy of Royal Patent 2944 Palapala Sila Nui, Ano Allodio (allodial title) (Exhibit J1), by certified copy of Royal Patent 1615 Palapala Sila Nui, Ano Allodio (allodial title) (Exhibit J2), and by certified copy of Survey Boundaries (Exhibit J3)

O teia mea palapala i hatu ia ma ka la 8 o Mei i ka makahiti 2024, na Terrill James Kane Alii Williams e noho ma P.O. Box 790172, Paia, HI 96779 e olelo me ta oiaio:

Etahi O au, Terrill James Kane Alii Williams, i hanau ia ma la 20 o Kepakemapa i ka makahiti 1996 i hooiaio na Birth Certificate (Exhibit A1/Mea A1)

Elua O Staceydee Pohaikaloa Ah Loo tou matuahine i hanau ia ma ka la 20 o Ianuali i ka makahiti 1970 i hooiaio na Certification of Live Birth (Exhibit B1/Mea B1)

Ekolu O Diane Kuuipo Shaw i hanau i ma ka la 24 o Okakopa i ka makahiti 1943, oia ka matuahine o Stacey Pohaikaloa Ah Loo i hooiaio na Certification of Live Birth (Exhibit C1/Mea C1), no laila oia tou tupunahine.

Eha Ua hanai ia atu o Diane Kuuipo Shaw mai tona matuahine ponoi o Marcellina Contrades. O ta inoa ponoi o Diane Kuuipo Shaw mamua o ta hanai ana, oia o Frances Alicia Tamburi i hooiaio na Amended Birth (Exhibit D1/Mea D1) a me Birth Record (Exhibit D2). O Marcellina Contrades tou tupunahine kuatahi.

Elima O Kahele Papoko ta matuahine o Marcellina Contrades i hooiaio na Delayed Certificate of Birth (Exhibit E1/Mea E1) a me Record of Issue of License to Marry (Exhibit E2/Mea E2), no laila oia tou tupunahine kualua.

Eono O Nohoanu Kapalehua ta matuahine o Kahele Papoko i hooiaio na Record of Death (Exhibit F1/Mea F1), no laila oia tou tupunahine kuakolu.

Ehitu O Keaouli Kapalehua ta matuahine o Nohoanu Kapalehua i hooiaio na Death Probate (Exhibit G1/Mea G1), no laila oia tou tupunahine kuaha.

Ewalu O Keaouli Kapalehua, oia no o Keouli i hooiaio na Marriage Certificate (Exhibit H1/Mea H1) a me Record of Marriage (Exhibit H1/Mea H2).

Eiwa O Namauike ta matuakane o Keouli i hooiaio na Death Probate (Exhibit I1/Mea I1), no laila oia tou tupunakane kualima.

Umi O Kelekau ta matuahine o Namauike i hooiaio na Death Probate (Exhibit I1/Mea I1), no laila oia tou tupunahine kuaono.

Umitumakahi O Kelekau te kaituahine o Papapa. O Nieke ta matuahine o Kelekau, o Palauakeke ta matuahine o Papapa. O Nieke te kaitaina o Palauakeke na na matua hootahi, o Waha ta matuakane laua o Namue ta matuahine, i hooiaio na Death Probate (Exhibit I1/Mea I1)

Umitumalua Ua haawi ia ta Royal Patent 1615 ia Papapa i hooiaio na Royal Patent 2944 Palapala Sila Nui Ano Allodio (Exhibit J1/Mea J1), na Royal Patent 1615 Palapala Sila Nui Ano Allodio (Exhibit J2/Mea J2), a me Survey Boundaries (Exhibit J3/Mea J3).

The above instrument and information contained herein are true and correct to the best of my knowledge, are set-forth for cause, superseding and all previous denials of aforementioned. I may have made, and my signature and seal hereinafter are the voluntary act of my own hands and FURTHERMORE SAYETH NAUGHT.

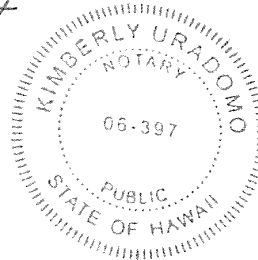
Subscribed, Sealed and Affirmed this 8th day of May in the year of our lord And savior, Two Thousand and Twenty-Four.

Terrill James Kane Alii Williams
Terrill James Kane Alii Williams

STATE OF HAWAII)
) SS:
COUNTY OF MAUI)

Subscribed and sworn before me this day: May 8, 2024
Kimberly Uradomo

Print name, Kimberly Uradomo
Notary Public State of Hawaii Comm exp. 07-02-2026
My commission expires: Second Judicial Circuit



CERTIFICATION
Document Date: 05/08/2024 Pages: 39
Notary Name: Kimberly Uradomo Second Circuit
Document Description: Affidavit of Terrill James Kane Alii Williams
Notary Signature: Kimberly Uradomo

Kimberly Uradomo
Commission expires: 7/2/2026



CERTIFICATE OF VITAL RECORD

VERIFY PRESENCE OF WATERMARK HOLD TO LIGHT TO VIEW

5530619

COMMONWEALTH OF VIRGINIA

DEPARTMENT OF HEALTH - DIVISION OF VITAL RECORDS

CERTIFICATE OF LIVE BIRTH

STATE FILE NUMBER: 145-96-062498

NAME OF REGISTRANT: TERRILL JAMES KANE ALII WILLIAMS

DATE OF BIRTH: SEPTEMBER 20, 1996 SEX: MALE

PLACE OF BIRTH: PORTSMOUTH, VIRGINIA

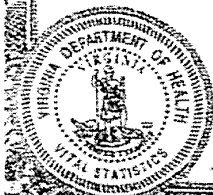
MAIDEN NAME OF MOTHER: STACEYDEE POHAIKEALDHA AHLOO

AGE OF MOTHER: 26

MOTHER'S PLACE OF BIRTH: HAWAII

DATE RECORD FILED: OCTOBER 11, 1996

VOID IF ALTERED OR ERASED



This is to certify that this is a true and correct reproduction or abstract of the official record filed with the Virginia Department Of Health, Richmond, Virginia

DATE ISSUED February 15, 2013

Janet M. Rainey
Janet M. Rainey, State Registrar

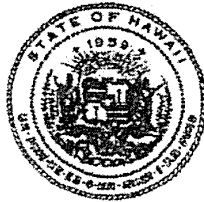
Do not accept unless on security paper with the seal of Virginia Department of Health, Vital Statistics in the lower left hand corner.
Section 32.1-272, Code of Virginia, as amended.

VS 15B

VOID WITHOUT WATERMARK OR IF ALTERED OR ERASED

CERTIFICATE OF LIVE BIRTH

STATE OF HAWAII
DEPARTMENT OF HEALTH



CERTIFICATE NO. 151 1970 - 000949

CHILD'S NAME
STACEY DEE POHAIKEALOHA AH LOO

DATE OF BIRTH
January 20, 1970

HOUR OF BIRTH
11:19 AM

SEX
FEMALE

CITY, TOWN OR LOCATION OF BIRTH
KAILUA

COUNTY OF BIRTH
HONOLULU

MOTHER'S MAIDEN NAME
DIANE KUIIPO SHAW

MOTHER'S RACE
HAWAIIAN CAUCASIAN INDIAN

DATE FILED BY REGISTRAR
January 26, 1970

Exhibit B1 / Mea B1
Page 6 of 39

CHSM 1.2 (Rev.10/14) LASER

This copy serves as prima facie evidence of the fact of birth in any court proceeding. [HRS 338-13(b), 338-19]

1095179

ANY ALTERATIONS INVALIDATE THIS CERTIFICATE

CERTIFICATION OF LIVE BIRTH

STATE OF HAWAII
HONOLULU



DEPARTMENT OF HEALTH
HAWAII U.S.A.

CERTIFICATE NO. 151 1943 - 000712

CHILD'S NAME
DIANE KUUIPO SHAW

DATE OF BIRTH
October 24, 1943

HOUR OF BIRTH
9:50 PM

SEX
FEMALE

CITY, TOWN OR LOCATION OF BIRTH
HONOLULU

ISLAND OF BIRTH
OAHU

COUNTY OF BIRTH
HONOLULU

MOTHER'S MAIDEN NAME
MARY KALEI

MOTHER'S RACE
PART HAWAIIAN

FATHER'S NAME
ALEXANDER SHAW

FATHER'S RACE
CAUCASIAN

DATE FILED BY REGISTRAR
October 29, 1943

Exhibit C1 / Mea C1
Page 7 of 39

OHSM 1.1 (Rev. 11/01) LASER

This copy serves as prima facie evidence of the fact of birth in any court proceeding. [HRS 338-13(b), 338-19]

ANY ALTERATIONS INVALIDATE THIS CERTIFICATE

AMENDED
BIRTH

Name SHAW, Diane Kuulipo

Reg. No. 712 712 Vol. 8

Place Honolulu

Date Oct. 24, 1943

Father's Name SHAW, Alexander

Mother's Name KALEI, Mary

Form VS-30-40M

BIRTH		AMENDED
Name	TAMBURI, Frances Alicia	
Reg. No.	4062	Vol. 804
Place	Honolulu	
Date	Oct. 24, 1943	
Father's Name	TAMBURI, HARRY	
Mother's Name	CONTRADES, MARCELLINA	
See Amended Record, Reg. No. 712 Vol. 8		
Form VS-20—66M—APCO 235250		

DELAYED CERTIFICATE OF BIRTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
RESEARCH AND STATISTICS OFFICE

FILE
NUMBER DB 3-00638

1. FULL NAME OF REGISTRANT MARCELLINA CONTRADES		
2. SEX Female	3. CHILDREN BORN TO MOTHER 4	4. DATE OF BIRTH (Month, Day, Year) February 3, 1908
5. PLACE OF BIRTH a. City or Town Kapahi	b. Island Kauai	c. Country Kauai
6. FULL NAME OF FATHER a. First Jose b. Middle c. Last Contrades		7. PLACE OF BIRTH Hawaii
8. FULL MAIDEN NAME OF MOTHER a. First Rose b. Middle c. Last		9. PLACE OF BIRTH Hawaii
10. I DECLARE UPON OATH THAT THE ABOVE STATEMENTS ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.	11. SIGNATURE OF AN-1 Marcella Contrades	10b. RELATIONSHIP to Registrar Self
DATE SIGNED Oct 24 1974	12. CURRENT ADDRESS (Number & Street, RFD or P.O. Box, City or Town, State, Zip Code) 1311 Sixth Avenue, Honolulu, HI 96816	
13. NOTARY'S SEAL State of Hawaii County of Honolulu SUBSCRIBED AND SWORN TO BEFORE ME ON Oct 24 1974		Signature of Notary James J. Monahan Notary Public My commission expires Sept 15 1975

14. ABSTRACT OF DOCUMENTARY EVIDENCE - TO BE COMPLETED BY REGISTRAR

1. Type of Document Kapaa High & Int. School record, Kauai	Date Established Sep. 6, 1918
Date of Birth or Age February 3, 1908	Place of Birth Kapahi, Kauai
Father's Name Jose Contrades	Mother's Name Rose Contrades
2. Type of Document Bureau of Census record, Washington, D.C.	Date Established Jan. 1, 1920
Date of Birth or Age 12 years	Place of Birth Hawaii
Father's Name not shown	Mother's Name not shown
3. Type of Document Hawaii marriage certificate (Vol. 119 #184)	Date Established July 6, 1932
Date of Birth or Age 24 years	Place of Birth Kapaa, Kauai
Father's Name Jose Contrades	Mother's Name Manuiki Kahele
4. Type of Document	Date Established
Date of Birth or Age	Place of Birth
Father's Name	Mother's Name

15. SUPPLEMENTARY ENTRIES	
16. NO PRIOR BIRTH CERTIFICATE HAS BEEN FOUND IN THE FILES OF THIS OFFICE AND THIS DELAYED BIRTH CERTIFICATE HAS BEEN ESTABLISHED IN ACCORDANCE WITH THE LAWS OF THIS STATE AND REGULATIONS OF THE STATE DEPARTMENT OF HEALTH. DOCUMENTARY EVIDENCE HAS BEEN REVIEWED WHICH SUPPORTS THE REGISTRANT'S CLAIMS REGARDING DATE AND PLACE OF BIRTH AND PARENTAGE.	
17. SIGNATURE OF REGISTRAR <i>Marcella Contrades</i>	18. DATE ACCEPTED OCT 25 1974

THIS CERTIFIES THAT THE ABOVE IS A TRUE AND CORRECT COPY OF THE
ORIGINAL RECORD ON FILE IN THE RESEARCH AND STATISTICS OFFICE
HAWAII STATE DEPARTMENT OF HEALTH

Walter B. Quisenberry
WALTER B. QUISENBERRY, M.D.
Director of Health

George H. Tokuyama
GEORGE H. TOKUYAMA
State Registrar

Date
Oct. 29, 1974

Exhibit E
Aea E1

K-76

169

Record of Issue of License to Marry

District of Kauai County of Kauai

License Issued by M. M. M. M. M. Date of License Apr 14, 1944

Name of Male Heathcliff Kuapohi Age 17 Bachelor
(2nd, 3rd, Marriage)

Nationality Hawaiian Residence Kapaa, Kauai

Name of Father Kaupuni Kuapohi Maiden Name of Mother Makiko Kuapohi

Race Hawaiian Race Hawaiian

Birthplace of Father { State or Country } Hawaii Birthplace of Mother { State or Country } Hawaii

Name of Female Margaret K. Centrado Age 15 Maid
(2nd, 3rd, Marriage)

Nationality Hawaiian Residence Kapaa, Kauai

Name of Father Joe K. Centrado Maiden Name of Mother Abile Papoko

Race Hawaiian Race Hawaiian

Birthplace of Father { State or Country } Hawaii Birthplace of Mother { State or Country } Hawaii

Names of Witnesses Mike Mansiki, John Kana

Place of Marriage Kapaa, Kauai

Ceremony to be Performed by _____

Copy sent to Registrar of Marriages this

14 day of April, 1944

(Signed) [Signature]
 Agent to Grant Marriage Licenses.

District of Kauai County of Kauai

HONOLULU STAR BULLETIN, LTD.

ADDING INK—THIS IS A PERMANENT RECORD

N. B.—Every item of information should be carefully supplied. AGH should be stated EXACTLY. PHYSICIANS should state CAUSE OF DEATH in plain terms, that it may be properly classified. The "Special Information" for persons dying away from home should be given in every instance.

PLACE OF DEATH

114
TERRITORY OF HAWAII
RECORD OF DEATH

County of... *Kauai*
Township of... *Lihue*
or
Village of... *Wailua*
or
City of... (No. Street)

If death occurred in a hospital or institution give its NAME instead of street and number.

If death occurs away from USUAL RESIDENCE give facts called for under "SPECIAL INFORMATION."

FULL NAME... *Kahale Papoko*

PERSONAL AND STATISTICAL PARTICULARS

MEDICAL CERTIFICATE OF DEATH

Sex *Female* Race *Hawaiian*
Date of Birth *February 25th 1890*
(Month) (Day) (Year)
Age *22* years *10* months *25* days
Single, Married, Widowed or Divorced *Single*
Birthplace (State or Country) *Lihue, Kauai*
Name of Father *James Timo Papoko*
Birthplace of Father (State or Country) *Huelo, Maui*
Maiden Name of Mother *Nohomanu Kapaehua*
Birthplace of Mother (State or Country) *Hanalei, Kauai*

Date of Death *January 20th 1912*
(Month) (Day) (Year)

I HEREBY CERTIFY, THAT I attended deceased from *19* to *19* and that death occurred, on the date above stated, at *19* M.
The cause of death was as follows:
did not attend properly from Pneumonia
Diagnosis made from history, symptoms and chest lung
Duration: *3* years *3* months *3* days
Contributory: *—*

(SIGNED) *Dr. H. Hofmann* M.D.
Jan 20 1912 (Address) *Kalia, Kona*

Occupation of deceased
The above stated personal particulars are true to the best of my knowledge and belief.
(Informant) *John K. Papoko*
(Address) *Kalia, Kona*

SPECIAL INFORMATION only for Hospitals, Institutions, Transients, or Recent Residents.

Former or Usual Residence... How long at... place of death... days
Where was disease contracted, if not place of death...

Entered *Jan 22 1912* *P.R. Puman* Registrar

Place of Burial *Wailua own grounds* Date of Burial *Jan 29th 1912*
Undertaker Address

Filed *APR -8 1912* *190* Secretary, Board of Health.

DAVID Y. IGE
GOVERNOR



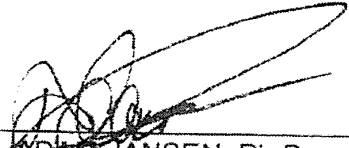
CURT T. OTAGURO
COMPTROLLER
AUDREY MIDANO
DEPUTY COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Pages 32-33 of the Minute Book of Judge Hardy, volume 6, August 1897-October 1910 (2 pages), from Probate Records of the Fifth Circuit Court [Series 027 volume 8], Judiciary of Hawai'i

on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 4th day of December, 2020 at Honolulu, State of Hawai'i.


ADAM JANSEN, Ph.D.
STATE ARCHIVIST
HAWAII STATE ARCHIVES
IOLANI PALACE GROUNDS
HONOLULU, HAWAII 96813

1897.

Second Court Fifth District. Honolulu Islands.

At Chambers.

{ in p. 362 vol. 5 }

In Probate.

the Estate of Kapalehuanu
deceased intestate.

} Before Hardy, J.

On the hearing of the petition of B. H. Bishop Administrator de bonis non of said Estate, for first and final hearing of his accounts, approval of the same, distribution to heirs, discharge from further responsibility as Administrator, and for the release of his sureties.

Decr 11

Petition filed December 11th 1897. Same day Ordered hearing of said petition for January 17th 1898 at 10 Am at the Court House Lihua, and that notice of same be published for three successive weeks in Hawaiian in the Hukoua Newspaper published at Honolulu and that all persons interested in said estate do then and there appear to show cause why the said petition should not be granted.

1898.

Jan'y 17.

This day being a Government Holiday the hearing is deferred to the 18th inst. at 10 Am at the Court House.

" 18.

Court opened at 10 Am. pursuant to Order of notice duly published and postponement of the 17th inst.

Present. B. H. Bishop Administrator. Kimo husband of Nohoanu deceased daughter of Kapalehuanu; Haomealani^m daughter of Kapalehuanu; Mokeleho^m husband of Kainuwai^m daughter of Kapalehuanu.
Kimo sworn.

The children of Kapalehuanu are Rose, Sarah, Kainuwai^m, Haomealani^m, Kapalehuanu^{2d}, Mary. Nohoanu^m deceased. Nohoanu married Kimo. They had five children all minors. whose names are Loke^m, Namoo^m, Kahalekulani^m, Rosilina^m, Kalani^m.

x under age.

The Court finds that Mary, Sarah, Rose, Kapalehuanu^{2d}, Kainuwai^m and Haomealani^m are children of Kapalehuanu deceased, and that Loke^m, Namoo^m, Kahalekulani^m, Rosilina^m and Kalani^m are the children of Kimo^m and Nohoanu his deceased wife who was the daughter of Kapalehuanu's estate, and the five grandchildren above named to one seventh (1/7) collectively.

DAVID Y. IGE
GOVERNOR



CURT T. OTAGURO
COMPTROLLER
AUDREY HIDANO
DEPUTY COMPTROLLER


STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P O BOX 119 HONOLULU, HAWAII 96810-0119

ARCHIVES DIVISION
HAWAII STATE ARCHIVES
KEKĀULUOHI BUILDING, IOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAII 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Probate No. 433, Estate of KAPALEHUA (83 pages), from Probate Records of the Fifth Circuit Court [Series 027-4], Judiciary of Hawai'i _____

on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 16th day of April, 2021 at Honolulu, State of Hawai'i.


ADAM JANSEN, Ph.D.
STATE ARCHIVIST

bei cui grade 14th judicial bei cur. St. S.
At Chambers. In Probate.

Holua Oct. 30-1890

Estate of Kapalehna^{vs.}

of Waialea, Kauai, deceased
intestate.

On the hearing of the petition of Mrs. Mary
Manoiki^{and} and Mrs. ~~the~~ Hohoann Kimo, for

Letters of Administration upon said estate.

~~transferred to Order of Court. Sept. 30. 1889.~~

Petition filed Sept. 30. 1890, notice of hearing
duly advertised for three successive weeks in
Hawaiiian, in the Kurekoo newspaper, printed
and published at Honolulu

{ Oct. 30
10 am.

Appeared Mrs. Mary Manoiki, & Mrs. Hohoann
Kimo. Manoiki^c husband of said Mary, and
Kimo^c husband of ^{said} Hohoann^w - also Mrs.

Keaonui Kapalehna, widow of ~~the~~ said deceased.

who is in opposition to the petition. —

Also Kawahamui^w ~~another~~ step mother
of Kapalehna. Also appeared Kaimi^c;

Mrs. Keaonui Kapalehna Divorced

I was first married to Salem
Hanchett by Waiamanu. She had one child -
Mary, the petitioner, but we had been
divorced before she was born. Think she was
seven years old when I married Kapalehna.
She Kapalehna brought her up. —

was present when Kapalehna died

Set 2

He died on the 14th of last May. He did not
make a will. — He was over 50 yrs of age.
Saw him buried at Maile Makua. —

We Kapalehua & had children viz,
Kaimi^{c.}

Kohoani^u

Sila^u

Rose^u

Kapalehua Jr.

Karimwai^u

Kamealani^u —

Carl Gensberg was on the request of
the widow Keaouli Kapalehua, and with
the consent of all parties present appointed
as Adm^r of the said Est. on his filing
a good & sufficient bond in the penal sum
of \$2000. — and was on the like request
and approval appointed as Guardian of
the 4 minor children of the dec^d. under
the same bond. —

J. Hardy.
Clerk.

Exhibit H1:3 /
Mea H1:3
Page 17 of 39

Oct 30

Bond filed and approved. J. W. Wilson Sec^y
Letter of Administration and Letter of
Guardianship of minor heirs of Kapalehua

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEOH-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

STATE OF HAWAII | KA MOKU'ĀINA O HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELawe LAULĀ
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

ARCHIVES DIVISION
HAWAII STATE ARCHIVES
KEKĀULUOHI BUILDING, 'IOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAII 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawaii'i, do hereby certify that the attached document is a true and correct copy of Page 14 of K-26, Records of Issue of License to Marry, Records of Marriage and Marriage Licenses, Kauai, 1918-1919, pgs. 1-47 (1 page), from Hawaii'i State Archives, Vital Statistics Collection [Series 223-17]

on file in the STATE ARCHIVES, at Honolulu, State of Hawaii'i.

Witness my hand and seal this 21st day of April, 2023 at Honolulu, State of Hawaii'i.

Exhibit H2:1 /
Mea H2:1
Page 18 of 39


ADAM JANSEN, Ph.D.
STATE ARCHIVIST

K-26

July 8, 18¹⁴
J. H. Maunaga

Record of Issue of License to Marry

District of Kauai County of Kauai

License Issued by J. H. Maunaga Date of License July 27, 18

Name of Male John Pahi Akima Age 56 Widower

Nationality Hawaiian Residence Kapa, Kauai (2nd, 3rd, Marriage)

Name of Father Akima Maiden Name of Mother Huana

Race Hawaiian Race Hawaiian

Residence Quint Kapa, Kauai Residence Quint Kapa, Kauai

Name of Female Rose Kapalehu Kapa Age 47 Widower

Nationality Hawaiian Residence Kapa, Kauai (2nd, 3rd, Marriage)

Name of Father Kapalehu Maiden Name of Mother Kaouli

Race Hawaiian Race Hawaiian

Residence Quint Kapa, Kauai Residence Quint Kapa, Kauai

Names of Witnesses Chas Lono, Mrs Chas Lono

Place of Marriage _____

Ceremony Performed by _____

Copy sent to Registrar of Marriages this

27 day of July 1918

(Signed)

J. H. Maunaga
Agent to Grant Marriage LicensesDistrict of Kauai County of Kauai

HONOLULU STAR-BULLETIN, LTD.

TERRITORY OF HAWAII

RECORD OF MARRIAGE

PLACE OF MARRIAGE

County of Hawaii
 Township of Kauai
 Village of Maunaloa
 City of _____

MALE
 Full name of groom John Carlos Okina
 Residence Alapaa, Hawaii
 Age at last birthday 26 years Nationality Hawaiian
 Birthplace of groom (Country) Honolulu, Oahu
 Length of residence in Territory of Hawaii Native Born

FATHER
 Full name Oh Kima (Ch)
 Race Chinese
 Birthplace of father (Country) Sing Kong, China

MOTHER
 Full maiden name Spaciousa Sanki-ah
 Race Hawaiian
 Birthplace of mother (Country) Han, Hawaii

License to marry issued by St. Margaret
 Witness to marriage ceremony Miss Lily Kane, Miss Mary Kane

Mated Aug 3, 1918 at 141 Kaniwa
 Minister St. Margaret
 Date of issue of license July 29, 1918

Filed Aug 9 1918 at Honolulu
 Registrar General, Territorial Dept. of Health

FEMALE
 Full name of bride Rose Hopahual Sagawa
 Residence Alapaa, Hawaii
 Age at last birthday 27 years Nationality Hawaiian
 Birthplace of bride (Country) Honolulu, Oahu
 Length of residence in Territory of Hawaii Native Born

FATHER
 Full name Hopahual
 Race Hawaiian
 Birthplace of father (Country) Honolulu, Hawaii

MOTHER
 Full maiden name Keolu
 Race Hawaiian
 Birthplace of mother (Country) Honolulu, Hawaii

Witness to marriage ceremony Miss Lily Kane, Miss Mary Kane

Mated Aug 3, 1918 at 141 Kaniwa
 Minister St. Margaret
 Date of issue of license July 29, 1918

Filed Aug 9 1918 at Honolulu
 Registrar General, Territorial Dept. of Health

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEOH-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

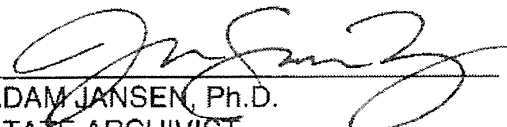
STATE OF HAWAII | KA MOKU'ĀINA O HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELawe LAULĀ
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

ARCHIVES DIVISION
HAWAII STATE ARCHIVES
KEKĀULUOHI BUILDING, 'IOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAII 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawaii, do hereby certify that the attached document is a true and correct copy of Probate No. 371 of KAUAKAHI (18 pages), from Probate Records of the Fifth Circuit Court [Series 027-3], Judiciary of Hawaii

on file in the STATE ARCHIVES, at Honolulu, State of Hawaii.

Witness my hand and seal this 5th day of May, 2023 at Honolulu, State of Hawaii.

for 
ADAM JANSEN, Ph.D.
STATE ARCHIVIST

Kalekau was deat's sister. Ariamata her husband. They had children.

1. ^{II} c kummu ^K & ^K namaniki ^K =

c kummu. m. to P Hoovea.

They had 6 children. 5 died

XV c kauhau ^K sury

c kamaniki mar. Paalea.

had 3 chil. 1 dead & sur 3 - viz.

XX:XXI Kela ^m pet. & Keoulu. ^m I

The 6 children above - of c kummu now
c kauhau. - Hoovea ^m - Polani ^m
Kalaeamakalii ^m c kieke ^m
Koalani ^m -

The 3 children of c kamaniki & Paalea

men.

Ike kummu. ^m

Kela ^m

Keoulu. ^m

Ike kummu married ms. Opu mui.

had 5 children 4 dead in infancy -

1 living Pakana. ^K

XX.

X. When I first knew deat he was an old

man. He was living at Waipouli -

He was then living with Kipula. ^D wife.

Pahmai was living with him -

I lived with Ike kummu. I think full 10 yrs.

at c kauhau. I married Kela at Nihoa.

114-3

I~~to~~ went to him with Kalekau. took care of
her. — Kalekau told me she was the sister
of deek. She was an old woman when I
married Shekumui. She was older than deek.
eika was their mother.

e kaun hāu " father.

They had 2 children Kalekau^m & deek

They were married ^{according to the} Ancient Hawaiian ^{custom} ~~custom~~ ~~custom~~

I never saw either of them. —

I first saw deek while McPhyde was Ct
judge, I think. Went to see him. He ^{acknowledged} ~~recognized~~

Kela as his granddaughter. We then went

to live at Wailea and have lived there

ever since — We did not go to deek ^{funeral} ~~funeral~~

Did not hear of his death, till after ^{the funeral} ~~the funeral~~.

✓ Kela^m Pet. Sworn: knew Kanakahi —

Palahikumoku was his first wife.

They had 1 child Poiakua, ^k dead.

Poiakua married — Kanakua. ^{Dead} —

They had no children —

Deek married 2 wife Kipola.

They had no children —

Deek died first. Kipola is dead. —

Kipola was married to another husband
before she married deek

actg for Pahnai - knew Poiekua. He died -
before dect. As I remember dect died in
64 or 65. I was teaching school at Wailua
at the time. Think dect. will was burned
in '07 - in which he bequeathed the half
his property to Kihula and the other half to
Pahnai. I and Stali were the witnesses to
the will. Dect died of dropsy 2 months
ailing - X. Poiekua died of - paralysis -
his wife survived him. He died in 63. or 64. -
Kanhue, knew Poiekua. He died before dect -

Hearing continued to - July 16. 1884
at 10 Am. - Cham. Koloa

July 16. 84. Hearing continued at per adjt. June 25. - 84
Present. Pet. clikas. In opposition Kaunualii.
his atty Kealahua. and Pahnai.

Pet. asks leave to introduce further testimony
No object being made, leave was granted.

X For Pet. Papapa. "Luvau" Bon ckihaw.
Lives now at Wailua. Has lived there 10 yrs.
Was living at ckihaw when dect died. -

I was once at Wailua before dect died.

I am a relative of dect -

Knew. saw personally the father and mother
of dect. ckaunas. father of dect

Meke mother - "

They have two children.
Kelikan^m 1st child.
Kauakahi 2^o

Kelikan married Aiamaha.

Their children were two.
e Kuumu^m. 1st
e Kamaiki^m. 2^o

e Kuumu^m mar. Hoovea.

They have 6 children. 1 child.

- xxx 1. e Kuumu^m living at Waimua
2. Koolio^m D. ~~2^o~~ ~~at~~
3. e Kike^m D. m.
4. Pahle^m D.
5. Hoovea^m D. m.
6. Koolani^m D.

e Kamaiki^m m. to Paalea.

3 children

1st e Kikum^m D. m. Omuu.

xxx 2. Kela w. Pet.

xxx 3. Kestuli w.

e Kikum^m & Omuu.

xxx 1 child. Pakava^m

at Deet's land. - Poekua's wife Kanahua was
there. But deat. P. first died then Kanahua. -
Deat was King when I went to Waialeale Island.

P. by - Contutank

Deat's name lived on his land. Pahuai house on
deat's land. When I first went to deat's Pahuai
was living there. I never heard that Pahuai was
deat's child.

~~My mother Palauakeke. - my mother~~

~~Puka - father~~

~~Kanahua - mother of Palauakeke~~

~~My grandmother - Kanahua mother of Puka~~

My mother was a sister of Puka -

Wahia & Kanahua. - Parents of.

Palauakeke & Puka -

Palauakeke m. Kanahua.

They had one child Puka. myself -

Lili. - with for 1st - 2nd -

From Puka lived at Kahaa
now live Lili. - knew deat well.

Lived at Kahaa - 10 years - Kanahua lived at
Lili 5 yrs. Deat died while I was at Kahaa.

My husband Puka was brother in law of deat -
was living at Deat when he died - in 1871 -
He left Kipuka his widow. Poekua was then

them. He is my grandson. Think I was 5 or 6 yrs old when I became the fosterchild of dect.

Lived with him from that time till he died.

My home stood on his Kuleana. He never paid any taxes on the land. He did not cultivate the land. He was unable to do more than a very little work. Know Kela, pet. His husband is Opunui. Never saw her at dect's. Kaumu alii made the coffin and buried Kanakahi.

Cross examined.

Dect made a will. It was burned when my home was burned before he died. My present home stands on the land granted to Kama hulelani. My home that was burned stood on Kanakahi's land. The home burned before dect's death.

// It appearing to the Court from the evidence adduced, that the heirs at law of Kanakahi, aside from the heirs of the widow Kupala, are Kela^m, the petitioner, a Kaauhau^m and Keouli^m - grandchildren of Kalekan, sister of Kanakahi; and Pakana^m ^{the great} grandson of Kalekan; and that ^{the} Court and Pakuairi has failed to show that he was adopted by Kanakahi as his heir // It is therefore

This cover sheet is for the certified copies of

Royal Patent: _____

Land Commission Award: _____

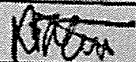
Grant: 2944

Total Pages: 3 (Including This Page)

I hereby certify that the foregoing document
is a true and correct copy of the document
archived on film in the Department of Land
and Natural Resources, Kalanimoku Building,
1151 Punchbowl Street, Honolulu, Hawaii.

Dated: Honolulu, Hawaii, this 22ND day of

AUGUST, 2023



Registrar, Bureau of Conveyances
Department of Land and Natural Resources

No. 2944

ROYAL PATENT.

KAMEHAMEHA IV. By the grace of God, King of the Hawaiian Islands, by this His Royal Patent, makes known unto all men, that he has, for himself and his successors in power, this day granted and given, absolutely, in Fee Simple, unto James Mc Kitchiston, Sinclair and Francis Sinclair ~~and Francis Sinclair~~ ^{of the Hawaiian Islands}, for the consideration of Ten Thousand dollars paid into the Royal Exchequer, ~~the sum of~~ ^{the sum of} ~~land situated at~~ ^{the sum of}

the whole of the lands now belonging to the Government on the Island of Nihoa, it being understood, that under the Patent the whole of the land on the said Island of Nihoa is conveyed to the said James Mc Kitchiston, Sinclair and Francis Sinclair, with the exception of the two lands known as Chakamua and Wakamua, set off to Chakamua in the great Division of 1848, and that tract of land sold to Papapa, containing fifty acres, which is more particularly described in Royal Patent N^o 1615 of And Charles, which Patent, in the Diagram, also describes the pieces of land set apart for Church and School lots, and also reserving and reserving to the Hawaiian Government, all Mineral and Metallic Mines of every description.

We have and do hold the above granted land in Fee Simple unto the said James Mc Kitchiston, Sinclair and Francis Sinclair, their heirs and assigns for ever - as Tenants in Common, subject to the taxes to be from time to time, imposed by the Legislative Council, equally upon all landed property held in Fee Simple.

On witness whereof, I have hereunto set my hand and caused the Great Seal of the Hawaiian Islands to be affixed at Honolulu this 23 day of January A.D. 1864

Kamehameha IV.

W. Kitchiston

By the King and (Kitchiston) J. Sinclair

Containing Acres, more or less
excepting and reserving to the Hawaiian Government, all mineral or metallic Mines of every description.

To have and to hold the above granted Land in Fee Simple, unto the said

Hers and Assigns forever, subject to the taxes to be from time to time imposed by the Legislative Council equally, upon all landed Property held in Fee Simple.

In Witness Whereof, I have hereunto set my Hand, and caused the Great Seal of the Hawaiian Islands to be affixed, at Honolulu, this
day of 18

This cover sheet is for the certified copies of

Royal Patent: _____

Land Commission Award: _____


Grant: 1615

Total Pages: 3 (Including This Page)

I hereby certify that the foregoing document
is a true and correct copy of the document
archived on film in the Department of Land
and Natural Resources, Kalanimoku Building,
1151 Punchbowl Street, Honolulu, Hawaii.

Dated: Honolulu, Hawaii, this 22ND day of

AUGUST, 2023



Registrar, Bureau of Conveyances
Department of Land and Natural Resources

FIELD

PALAPALA SILA NOL.

Ma kela Palapala Sila hui te hōke aku nei o Kamehameha 111, o te Ahi nui o ke Akua i kōna hōkomaiki i hōonohu ai māhala o ke Hawai'i Pae Aina, i ke kōkua o pua, i kela la, nōne'ia, o te kōne'ia hope Ahi, i te hōkomaiki hōi kōne'ia oia ma ke ao aloha i te *Polipolip* i kea *wahe* kōkua i māno pōne i te, i kela apāne siue i pua o wahe i te *Omamamala* o te *Omamamala* ma ke Mokupuni o *Pūhāne* i te pōne hui kō wahe oia ma ke Mokuna :

Bismarkas ma Kachakai i ka Kiki Kema
 o Kema a ehele ma ka propheetia e pumi ana
 i Kema ma ka wao maunika, penei A. 29th H. 207
 Kaul. A. 9th H. 500 Kaul. A. 16th H. 471 Kaul. A. 28th
 H. 625 Kaul. A. 17th H. 505 Kaul. A. 9th H. 1162 Kaul.
 A. 35th H. 427 Kaul. A. 36th H. 607 Kaul. A. 55th H. 507
 Kaul. A. 14th H. 1002 Kaul. A. 65th H. 295 Kaul. A. 11th H.
 207 Kaul. A. 58th H. 207 Kaul. A. 14th H. 292 Kaul. Ika
 hua i Kachakai ma ka Kiki Akua. Kema Alaka
 ehele ana ma Kachakai a ka hounaka ana
 He ke Kachua o ka Halepuka ma Kachakai
 Kaula, a oia e pumi ana ma Kachakai e pumi ana
 ai ma wao a oia ma Kuleana o ma Kachakai

2 i mō e ika'i, ua kau wau i kō'a inoa, a meka Eila Noi o ko Hava'i Pae Aiea, me
Honolulu, i keia la 20 o Ianuāria, 1855

Harriet Lane

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

MEON-LENG SILLIMAN
DEPUTY COMPTROLLER
KA HOPE LUNA HO'OMALU HANA LAULĀ

STATE OF HAWAII | KA MOKU'ĀINA O HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ
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ARCHIVES DIVISION
HAWAII STATE ARCHIVES
KEKĀULUOHI BUILDING, IOLANI PALACE GROUNDS
364 SOUTH KING STREET
HONOLULU, HAWAII 96813

I, DR. ADAM JANSEN, State Archivist of the Public Archives of the State of Hawai'i, do hereby certify that the attached document is a true and correct copy of Survey Notes for Royal Patent Grant No. 1615, to PAPAPA & OTHERS, Omaumalua & Kamalino, Niihau (8 pages), from Grant Survey Notes [Series 526-16], [Commissioner of Public Lands] Department of Land and Natural Resources

on file in the STATE ARCHIVES, at Honolulu, State of Hawai'i.

Witness my hand and seal this 8th day of April, 2024 at Honolulu, State of Hawai'i.


for 
ADAM JANSEN, Ph.D.
STATE ARCHIVIST

Exhibit J3:1 / Mea J3:1
Page 34 of 39

ROYAL PATENT GRANT NO. 1615

PAPAPA & OTHERS

Omaumalua & Kamalino, Niihau

Honolulu
Oct. 16th 1854

To His Highness John Young,
Minister of the Interior &c }
Sic;

I have the honor to enclose herewith a survey of fifty acres of land at Ommamalia and Kamalino on the Island of Oahu - The land is poor and was sold at 25 cents per acre - The Patent is to be made out to Papapa - Please find herewith the money for land & Patent - less my commission on the sale.

Respectfully
Your obt. serv't
J. W. Marsh
Att'y and Surveyor

12.50	
<u>2.50</u>	
10	
16.50	
<u>3.50</u>	
13.00	3.50

16.50
1

1615

Papapa,
Niihan

A KAUKU.

*E hooholoia e ka Moi a me ka Hui,
Ahaolelo Kau Kanawai o ke Aupuni.*

PAUKU 1. Ina e make kekahi kane a wahine paha iloko o

2 ole, aole ana keiki, aole makuakane, aole makuahine, aole kaiku- a, kaikunane, kai-
3 kaina, a kaikuahine paha e ola ana, e ili aku kona waiwai paa a me ka waiwai lewa o
4 kela ano keia ano o ua mea make la, hookahi hapalua i kana wahine kanemake, ina he
5 wahine kana a ina hoi he wahine ka mea i make kauoha ole, alaila, i kana kane mare, ina
6 he kane kana, a o kekahi hapalua e ili aku i na kaikuaana, kaikunane, kaikaina, a kaiku-
7 ahine paha o ka makuakane a me ka makuahine o ka mea make kauoha ole, a i ko la-
8 kou man keiki a me na hooilina o lakou i komo i ko lakou wahi, a ina aole kekahi o ia
9 poe i hai ia maluna e ola ana i ka wa i make ai ua mea make la, alaila e ili aku ka
10 waiwai e mafele like ia i na hanauna pili koko like, aole nae e loa ka mafele o ia
11 waiwai i na poe pani hakahaka ma kahi o na hanauna pili i lula e i ka make; a ina
12 aole he wahine kane make, a kane mare paha a ka mea make kauoha ole, alaila e ili
13 aku kona waiwai a pau i ua poe hooilina la a me na pili koko ona; aka nae, ina ua loa
14 iaia ka waiwai ma o kekahi makua ona, alaila e oi ke kuleana o na kaikuaana, kaiku-
15 nane, kaikaina a kaikuahine paha o ua makua la, mamna o ko na mea e ae.

16 Ina he wahine mare ka ka mea make kauoha ole, aole nae ona hoahanau i koe i ka
17 wa i make ai, he wahine kane make wale no, alaila e ili aku kona waiwai a pau i kana
18 wahine; a ina hoi he wahine ka mea make kauoha ole, aole ona hoahanau i koe, he
19 kane mare wale no, alaila e ili ana kona waiwai a pau i ke kane.

20 PAUKU 2. O na kanawai a me na hapa kanawai a pau i koe i koia kanawai, ma keia
21 na hoopau ia no.

From: [Elizabeth Lovejoy-Yundt](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please reject FEIS for Pohakuloa
Date: Friday, May 9, 2025 4:58:47 AM

Aloha Members of the Board of Land and Natural Resources,

Please REJECT the Army's final Environmental Impact Statement (Agenda item D-1) for their proposal to continue to occupy 22,750 acres of State land at Pōhakuloa Training Area on Hawai'i island ("PTA") for an undetermined amount of time and conditions.

The Board should require the Army to provide the following information to assist with the Board's future decision making on any "real estate" proposal for PTA:

(1) Contamination from past, present, and future military actions.

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

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

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

d. The FEIS does not address logical questions. How can existing and future contamination be removed? Will it be removed? How much has it already spread into the soils, vegetation, and animal life? How much worse will it get with continued Army operations?

(2) Potential and means to restore these lands.

a. *Can* the Army clean up these lands? How? To what degree will the lands be remediated? What happens if they can't do it? In response to these questions, the Army refers to FEIS section 3.5.6, which says "cleanup and restoration . . . are not part of the Proposed Action" and "future cleanup and restoration requirements, standard processes, and associated cost are unknown." **V1 at 3-122**

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

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

(3) Army is withholding information on accumulating contamination.

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

b. The EIS does not tell us how much contamination has accumulated, despite these procedures, and its impacts.

c. KAHEA asked about PTA's hazardous waste spill risks. The Army responded by: (1) telling KAHEA to file a Freedom of Information Act request for the information, (2) deleting the section describing hazardous waste storage

on PTA State lands. Has hazardous waste spilled on state lands? Where are these records?

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

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

b. The Army flagged this comment as "not resolved".

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

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

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

(6) Could contaminants have impacts on human health?

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

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

c. The FEIS acknowledges "airborne concentrations of lead on [Department of Defense] firing ranges have exceeded the Occupational Safety and Health Administration permissible exposure limit for some job duties, which might lead to increased blood lead levels". **V1 at 3-117** Yet there is no mitigation or study proposed to prevent this from happening at PTA.

(7) Cumulative impacts of the entirety of PTA

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

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

(8) Fire impacts are worse than disclosed.

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

b. The Department of Interior pointed out the "entire population of Palila are restricted to the west slope of Mauna Kea and are extremely vulnerable to an extinction event such as a wildland fire, as happened in 2021." **V2 at D-214**

(9) No disclosure of greenhouse gases

a. The EIS discloses the Army does not have data on its greenhouse gas emissions ("GHGs") for activities on State lands. Why not? The U.S. military reportedly produces more GHGs than the entire nations of Portugal or Denmark,[1] but does not track its own emissions?

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

(10) Existing mitigation proven insufficient by ongoing impacts.

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

b. And yet, proposed new mitigation solely consists in studies, reporting, monitoring, and potentially deploying a biological control directed at reducing wildfires and to formalize an access agreement with Native Hawaiian groups and individuals. **V1 at 3-220** As noted by DLNR staff, the Army should have done these studies as part of this EIS - not afterwards.

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

Submittal at 23

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

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

Mahalo for considering my testimony.

Elizabeth Lovejoy-Yundt, Pahoa resident of Big Island

From: [kealani zayas](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] PTA Testimony
Date: Friday, May 9, 2025 6:35:27 AM

Our 'āina is not disposable. The Army's failure to consult with communities or follow Hawai'i law makes Agenda Item D-1 legally and morally unacceptable.