

From: [Barbara Alexander](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, June 25, 2025 11:45:37 AM

To: BLNR regarding the flawed FEIS submitted by the U.S. Army.

I strongly but respectfully request that the BLNR reject the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho. This FEIS is insufficient. It is incumbent upon the BLNR to protect our natural resources.

As your own Staff report states, this FEIS is replete with errors, and omissions. The BO was lacking/used outdated data. Consultation regarding cultural issues did not occur until AFTER the FEIS was submitted.

My conclusion is either the FEIS was prepared by incompetent, lazy U.S. Army personnel or by personnel who apparently thought that they ought not be subject to accountability for their proposed actions.

NO MORE!!

This FEIS ought to be rejected.

Additionally, ALL/any current U.S. Army activities ought to be halted AT ONCE.

The U.S. Army is flagrantly flouting its responsibility in dealing with the State of Hawaii.

The U.S. Army ought to be ordered to commence clean up activities at once with a clear completion date given.

The people of this State ought to be treated with respect. The U.S. Army continues to disrespect us. This is our home!

I do not welcome the U.S. Army into our home.

Mahalo.

Respectfully submitted by:

**B.A. Alexander
Ka'ōhāo, O'ahu Resident**

From: [Jules Bacon](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] reject the U.S. Army's Final Environmental Impact Statement
Date: Wednesday, June 25, 2025 9:22:38 AM

Hello. I would encourage you to reject the U.S. Army's Final Environmental Impact Statement (FEIS) and protect sacred lands from further military destruction.

Protect sacred sites.

Thank you.

Jules Bacon

From: [Lilia Bickson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony for No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Wednesday, June 25, 2025 9:29:52 AM

Aloha members of the Board of Land and Natural Resources,

My name is Lilia, and I have been a resident of Scottsdale, AZ since 2016 when my family moved away from my birthplace on O'ahu. Despite being away from the islands for nearly a decade, I am writing today to express my strong opposition to renewing the U.S. Army's lease on State-owned lands at Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation. With respect and urgency, I ask that the BLNR reject this lease renewal.

Sponsoring continued military activity on beloved Hawaiian lands, especially during the global geopolitical conflicts we are currently living through, is sorely short-sighted when considering long-term goals for peace, freedom, and healing for our people and our 'āina. Prioritizing war games over *land and natural resources* is a disservice. The Kahuku Training Area alone occupies 9,480 acres and 15 ahupua'a that could home citizens, wildlife, and allow local businesses to thrive. I recommend that the BLNR support these lands to community stewards and Kānaka 'Ōiwi.

Mahalo for your consideration,
Lilia Bickson
Scottsdale, AZ

From: [Jim Cooper](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 10:52:10 AM

Topic: Agenda item D-1

This FEIS, submitted by the U.S. Army is woefully inadequate and should be rejected.

This FEIS is so replete with deficiencies that the staff of the Department of Land and Natural Resources (DLNR) itself have declared it insufficient.

The public trust doctrine requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources. The BLNR's core responsibility is to protect the interests of the present and future generations of beneficiaries of that trust.

Please hold the Army accountable to the law, and to REJECT this flawed FEIS.

Mahalo,
Jim Cooper
Palolo Valley 96816

From: [Jan Coyne](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] U.S. Army Final Environmental Impact Statement
Date: Wednesday, June 25, 2025 10:05:32 AM

Hello. I am writing to urge you to reject the Army's FEIS for Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation. I lived on Oahu and went to high school in Wahiawa at the height of the Vietnam War. I can understand the perceived need for these training areas at the time, but it makes no sense to me now. The land should be returned to the Hawaiian people.

Respectfully submitted by
Jan Coyne
Athens, Georgia

From: [Dave Cunningham](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] U.S.Army's FEIS
Date: Wednesday, June 25, 2025 10:30:56 AM

Good morning,

I would like to strongly recommend that the Army's FEIS report be rejected. The report is blatantly flawed (I have participated in several EIS efforts) and the military has shown little or no interest in protecting the aina. They do not clean up their messes; never have. If they were making an honest effort that would be one situation but they are not.

Sincerely,

--

:Dave Cunningham
Hanapepe, HI
310-505-8155

From: [Dinty Dan](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the U.S. Army's Final Environmental Impact Statement (FEIS)
Date: Wednesday, June 25, 2025 9:28:29 AM

To whom it may concern:

The time has come to end the military occupation of Hawai'i and return stolen land back to Native Hawaiians. Please reject the U.S. Army's Final Environmental Impact Statement and start the healing on this sacred land. There are several reasons why the Army should vacate this land:

1. The lands have sacred burial sites, cultural sites, endangered species habitats and critical water sources.
2. The Army has failed to conduct full archaeological and cultural surveys of the lands.
3. The FEIS ignores key alternatives (like shorter lease terms or no military use).
4. The Army's use has already caused environmental damage and desecration of sacred lands.

These lands should be restored and returned to Native Hawaiian peoples.

Thank you for your consideration.

Sincerely,

Daniel Moore
Seattle, WA 98144

From: [Miya DeVoogd](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Re: Reject The Army's FEIS For Kahuku, Kawaihoa-Poamoho, And Mākua
Date: Wednesday, June 25, 2025 8:39:00 AM

I forgot to include that this is testimony on Agenda Item D-1.

Mahalo!
Miya DeVoogd

On Jun 25, 2025, at 2:05 PM, Miya DeVoogd <miyamoosh@yahoo.com> wrote:

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, and to urge the land board to reject the Army's EIS.

These places are not just a piece of land—they are wahi pana, sacred and beloved places that hold the stories and legacy of Kānaka Maoli. They are sacred burial sites, endangered species habitats, and the birth stands of generational families. Decades of misuse to 'āina occupied by the Army has proven that they are not capable of being the stewards of these significant wahi pana.

Additionally, the military training activities of this scale are simply not compatible with the intention of conservation, upholding cultural integrity, and 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 disclosure of Military activities on leased lands adjacent to federal lands

- Restrictive cultural access policies hindering Kānaka Maoli cultural practices and access to numerous historical and sacred sites

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

I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation. It is time to release military hold on these lands, and allow their generational caretakers to begin the healing process.

Mahalo,

Miya DeVoogd

96815

From: [THOMAS DiGrazia](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, June 25, 2025 11:21:16 AM

Dear Board members, please follow the recommendation of your staff that the present DOD EIS is insufficient. Further, the EIS does not protect the long-term environmental interests of our children and grandchildren. Please reject the subject EIS.

In peace,
Tom DiGrazia

From: [Brian Emmons](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Makua, Poamoho, and Kahuku Army FEIS
Date: Wednesday, June 25, 2025 10:48:07 AM

The FEIS document submitted by the U. S. Army, has been very poorly prepared. It is woefully inadequate and should be rejected.

Aloha, Brian Emmons, Sunset Beach

Sent from my iPhone

From: [Joaquin E](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Non Resident Testimony
Date: Wednesday, June 25, 2025 8:46:54 AM

Aloha members of the Board of Land and Natural Resources,

My name is Joaquin Escoto, and I am a resident of Los Angeles, CA USA. I am submitting this testimony as a non-resident of Hawai'i who cares deeply about Indigenous rights, cultural preservation, and environmental protection. I am writing to respectfully urge the BLNR to reject the renewal of the U.S. Army's lease for State-owned lands at Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation.

The Army's Final Environmental Impact Statement makes clear that the military's continued presence restricts cultural access and harms the ability of Native Hawaiians to connect with and care for these sacred lands. The access that is offered is burdened by strict conditions: permits, escorts, and limited dates that make it impossible for these communities to fulfill their cultural responsibilities. As someone who believes in justice, I stand in solidarity with the Native Hawaiian community's call for land return, cleanup, and restoration.

Please do what is right: reject this lease renewal and support the return of these lands to Native Hawaiian stewardship. The future of Hawai'i's lands and people depends on decisions like this.

Mahalo for your time and consideration.

Sincerely,
[Joaquin Escoto]
[Los Angeles/CA/USA]

~Joaquin E.

From: [Dale Evans](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 10:19:58 AM

As a citizen of Oahu, I urge the Board to reject the FEIS submitted by the military regarding Makua Military Reservation, Kahuku Training Area, and Poamoho.

As a citizen of Earth, I urge you to rid our island of these occupied areas that are sites of continual desecration of the aina. The military is neither a good neighbor nor a benevolent occupying force. It's time to cancel these leases and eliminate further opportunity for their irresponsible, destructive actions.

Sincerely,
Dale Evans
Waimanalo

From: [Richard Furst](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 9:49:49 AM

Aloha Board,

My name is Richard Furst, and I am a resident of Honolulu. As hunter, angler, and an avid outdoorsman, I am very concerned with the US military's lack of stewardship of the State's leased lands that they have occupied. I am writing to urge the Board to follow Land Division (LD) staff recommendation to reject the current flawed FEIS.

According to the meeting item announcement, the LD staff were in consensus across all divisions about the lack of clear and intact data regarding the potential impacts of the Army's proposed uses, and therefore they could not make informed decisions. This is absolutely unacceptable, and I respectfully request that the Board hold the Army accountable and reject the current FEIS.

Mahalo nui for your consideration.

Best regards,

Richard Furst
766 Hao St, Honolulu, HI 96821
808-308-8925

From: [Emily Garland](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Wednesday, June 25, 2025 11:06:11 AM

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

My name is Emily Garland and I strongly urge you to REJECT the Army's legally deficient Final Environmental Impact Statement (FEIS) for the retention of lands on O'ahu.

Many of the same concerns the Board raised in its rejection of the Pōhakuloa FEIS — including the lack of cultural and biological surveys, inadequate cultural consultation, and unaddressed land use compliance issues— are found again in this document. This FEIS also fails to address stream impacts, potential groundwater contamination, and necessary land remediation plans.

Accepting this FEIS would signal that our environmental laws, the public trust, and Native Hawaiian rights can be disregarded with no consequence.

Please uphold your trust responsibilities, the mission of your department, and the laws that protect our 'āina and our future. Reject the FEIS.

Mahalo nui for your consideration.

Sincerely,
Emily Garland

From: [Janice Glennie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] REJECT the Army's FEIS for Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation
Date: Wednesday, June 25, 2025 11:32:03 AM
Importance: High

Aloha Land Board Members:

I'm writing to express my strong opposition to the U.S. Army's proposed control of leased lands at **Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation**. I also urge the land board to reject the Army's EIS.

I've spent my adult life working to protect special lands and our oceans so that all people, and especially native Hawaiians, have places where they can grow and thrive. The places under threat by continued military use are living, breathing entities that connect humans and all of nature and keeps us alive. Some are sacred, some are historical, some are environmentally indispensable. Decades of misuse by the military has shown that it isn't capable of being the stewards of these significant hawaiian lands.

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

- Inadequate Environmental and Cultural Impact Analysis
- Lack of a sufficient disclosure of Military activities on leased lands adjacent to federal lands
- None of the 3 training areas provide housing to their service folks; thus decreasing the availability of affordable housing to local residents, and displacing Kānaka Maoli
- Restrictive cultural access policies hindering Kānaka Maoli cultural practices and access to numerous historical and sacred sites
- The approval of the EIS ultimately conflicts with the BLNR's constitutional duty to mālama 'āina

The kuleana of Members of the land board is to respect the land, the culture, and the people of Hawai'i. That includes rejecting the Army's FEIS for Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation. It is time to release military hold on these lands, and allow their generational caretakers to begin the healing process.

Mahalo for hearing the voices of the people — people who know we can't militarize our way into peace, harmony, health and safety. We need more, especially protected public lands and the resources they hold.

Best regards,

Janice Palma-Glennie

P.O. Box 4849
Kailua-Kona, Hawai'i 96745

From: [Regina Gregory](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] army training lands - oahu - eis
Date: Wednesday, June 25, 2025 11:15:27 AM

Dear BLNR

Please recommend that the Army choose the "no action" alternative, i.e., do not pursue land retention.

Thank you
Regina Gregory

From: [John Harder](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 11:20:00 AM

Aloha

Rarely have I reviewed an FEIS document as poorly prepared as this one, submitted by the U.S. Army. It is woefully inadequate and should be rejected.

This FEIS is so replete with deficiencies that the staff of the Department of Land and Natural Resources (DLNR) itself have declared it insufficient

In addition to the leakage from the Red Hill Underground Fuel Storage Facility that has irreversibly damaged the Oahu's drinking water supply; *decades of bombing, live fire exercises, and military training exercises have damaged beyond repair the natural landscape and once pristine environments of thousands of acres on multiple islands.*

The military's constant reassurances that they will "clean up" and "restore" the lands they desecrate have been hollow promises.

It's time to say NO to the renewing of land leases at Pohakuloa, Kahuku, Kawaihoa-Poamoho, and Makua. We must also refuse expansion at Barking Sands and the bombing of Ka'ula Island.

Support for American troops, belief in the importance of national security, rejection of the endless expansion of the U.S. war machine, and protection of our natural environment, cultural resources, and endangered species; are values that can and DO, co-exist.

Mahalo for your consideration, John Harder - former Director, Office of Solid Waste Management, Dept of Health, State of Hawaii

If you're not for ZERO Waste, how much Waste ARE you for?

From: [William Higa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] U.S. Army's Final Environmental Impact Statement
Date: Wednesday, June 25, 2025 10:08:13 AM

Please reject the impact statement as it is inadequate and deficient.

From: [Lorna Holmes](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1: Army's FEIS
Date: Wednesday, June 25, 2025 10:49:30 AM

Aloha BLNR Members,

As a citizen and resident of Hawaii, I urge you to respect the DLNR Staff recommendation of non-acceptance of this inadequate FEIS, due to a clear lack of baseline data. It is obvious that the Army is not providing the data because the conclusions to be reached from it will not support their project. Too much damage has already been done, and it is time to call a halt.

Mahalo for your work,

Dr. Lorna Holmes

Honolulu 96826

From: [Gary Hooser](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1 - Urging BLNR to REJECT FEIS
Date: Wednesday, June 25, 2025 9:59:10 AM

Testimony on agenda item D-1 - urging the BLNR to reject the Army FEIS

Aloha Chair Chang and BLNR Members,

One of the various hats I've worn over my past 25 years of public service is Director of the State Office of Environmental Quality Control (OEQC) – responsible at the time for administering HRS Chapter 343, Hawaii's environmental review law.

While serving as the OEQC Director, I reviewed countless environmental review documents, EA's, EIS's, FEIS's etc.

Rarely if ever, have I reviewed an FEIS document as poorly prepared as THIS one, submitted by the U.S. Army. It is woefully inadequate and should be rejected.

As you are already aware, the staff of the Department of Land and Natural Resources (DLNR) has also declared the documents submitted inadequate on many, many levels.

The public trust doctrine requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources. Your core responsibility is to protect the interests of present and future generations of beneficiaries of that trust, and thus I implore you to please exercise this fiduciary responsibility by unequivocally rejecting this FEIS.

Support for American troops, belief in the importance of national security, rejection of the endless expansion of the U.S. war machine, and protection of our natural environment, cultural resources, and endangered species: are values that can and DO, co-exist.

Please do what is right, just, and legal - reject the FEIS.

Sincerely,

Gary Hooser
808-652-4279

From: [Sam Ikehara](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Wednesday, June 25, 2025 11:28:21 AM

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

My name is Sam Ikehara and I strongly urge you to REJECT this legally deficient Final Environmental Impact Statement (FEIS) for the Army's retention of lands on O'ahu.

Throughout the environmental review process, the Army has inexplicably ignored repeated comments and concerns raised by the Hawai'i community, including your own DLNR staff. As a result, this document fails to provide the information needed to determine potential impacts to streams, aquifers, native and endangered species, cultural sites, Native Hawaiian traditional and customary practices, and other critical public trust resources and constitutional rights, as listed below:

- **This FEIS inappropriately relies on decades old biological studies and lacks a clear and current baseline of data on native and endangered species.** With such incomplete historical biological data and no current comprehensive studies or surveys included in the FEIS, the ability to holistically assess the potential environmental impacts to our native species is severely impacted. As a result, there may be irreversible harm done to our native species, such as the 'ua'u, 'a'o, pueo, 'i'iwi, and 'ope'ape'a, found in the lands considered for "retention." This alone is grounds for rejection of the FEIS.
- **The Army failed to consult with the 'Aha Moku, its executive director, and several key kūpuna from the relevant moku—after being explicitly told to do so by the DLNR staff.** This is also grounds for rejection. Only after the BLNR's non-acceptance decision of the Pōhakuloa FEIS, did the Army initiate a meeting with the 'Aha Moku. However, this meeting was scheduled after the meeting of the publication of the FEIS, thus any consultation provided in this meeting would not be considered as part of the FEIS. Please don't reward the Army's belated and ineffectual attempt to consult the 'Aha Moku by accepting this deficient document.
- **As highlighted by the disastrous Red Hill Fuel Tank leaks, and the continual discovery of PFAS in groundwater under former and current military sites, there have been many recent and historical instances of military neglect impacting our precious wai.** Notably, the deficient FEIS lacks requested data as to how military activities from the proposed retention scenarios may contaminate ground water. Oil leaks from vehicles or residual

unexploded ordinance are just some of the ways that our public trust water resources could be impacted by the Army's activities. The BLNR must remember the harsh lessons of Kapūkakī, and require the Army to provide a full accounting of potential threats to our precious wai - before our history of water contamination repeats itself yet again.

- **By accepting such a shoddy FEIS, the BLNR will make it impossible to carry out its overall mission.** Every subsequent applicant required to undergo environmental review before a BLNR action will be able to point to the BLNR's acceptance of this deficient document to excuse their own shortcomings, and future BLNR members may feel pressured to give in to their demands for deference—at the expense of our natural and cultural resources, and the present and future generations who call or will call Hawai'i home.
- **The Army has repeatedly failed to properly consult kūpuna and conduct surveys of historic and cultural resources.** Only approximately 19% of the land was subjected to an archeological survey. No consideration was given to any potential unidentified archaeological and cultural sites that were mentioned in Native Hawaiian traditions and are possibly within these unsurveyed lands. Further, there are multiple published stories, including the stories of Kelea, Lō'aikanaka (O'ahunui) and Pa'ahana, that are set within these lands that are not included in the Cultural Impact Assessment. The complete disregard of traditional stories and practices is disrespectful and insulting to Kānaka 'Ōiwi and their ancestral lands.
- **The public trust doctrine requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources, and in looking out for the interests of the present and future generations of beneficiaries of the trust.** Without cultural surveys, biological opinions, or a good faith assessment of alternative beneficial uses of the long-abused 'āina at Kahuku, Kawaihoa-Poamoho, and Mākua, the BLNR cannot develop a diligent and thorough understanding of what public trust resources may need protecting, regardless of what happens with the leases at issue. The Army must go back and do its homework, so that the BLNR can uphold its own responsibilities under our constitution and the public trust.

Thankfully, your staff has made the appropriate recommendation to reject the FEIS as insufficient under the law. Please uphold the integrity of our environmental review, land use laws, and your own staff and - *do not accept* this faulty and legally flawed document.

Mahalo nui for your consideration of this testimony.
Sam Ikehara, Ph.D.

From: [Jerard Jardin](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 9:34:01 AM

Aloha,

I would like to submit testimony against the US military lease request.

The EIS is woefully inadequate and should be rejected.

I am calling for the BLNR's rejection of the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.

**Mahalo,
Jerard Jardin
418A Uhini Pl.
Honolulu, HI 96813**

--

Jerard Jardin
Jardin Sea Level Systems
418A Uhini Pl.
Honolulu, HAWAII 96813
808-373-3908

From: [keliiikeole kalaauokaaea-kahele](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject EIS
Date: Wednesday, June 25, 2025 9:18:04 AM

Aloha,

My Ohana and I reject the EIS and renewal of any leases. The United states has no jurisdiction in Hawai'i, no treaty of annexation exist, and the United nation has supported war crimes and allowed America to illegal occupy Hawai'i.. Our people has suffered for 132years watch Our homeland be destroyed and sold to the highest bidder, Hewa, as slavery continues since janurary 17, 1893...Get out, go back to where u folks belong, u not wanted here, PURE EVIL, GREED, CORRUPTION !!!

Keli'i

[Sent from Yahoo Mail for iPhone](#)

From: [Angel Kinney](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Wednesday, June 25, 2025 9:13:55 AM

Aloha members of the Board of Land and Natural Resources,

My name is Angel Kinney, and I am a resident of Brooklyn, NY, USA. I am submitting this testimony as a non-resident of Hawai'i who cares deeply about Indigenous rights, cultural preservation, and environmental protection. I am writing to respectfully urge the BLNR to reject the renewal of the U.S. Army's lease for State-owned lands at Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation.

The Army's Final Environmental Impact Statement makes clear that the military's continued presence restricts cultural access and harms the ability of Native Hawaiians to connect with and care for these sacred lands. The access that is offered is burdened by strict conditions: permits, escorts, and limited dates that make it impossible for these communities to fulfill their cultural responsibilities. As someone who believes in justice, I stand in solidarity with the Native Hawaiian community's call for land return, cleanup, and restoration.

Please do what is right: reject this lease renewal and support the return of these lands to Native Hawaiian stewardship. The future of Hawai'i's lands and people depends on decisions like this.

Mahalo for your time and consideration.

Sincerely,
Angel Kinney
Brooklyn, NY, USA

Angel Kinney
They/them/theirs

Questions about pronouns? Look below ↓
<https://letsqueerthingsup.com/2014/09/15/what-youre-actually-saying-when-you-ignore-someones-preferred-gender-pronouns/>

From: [Ginger Lua](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Wednesday, June 25, 2025 11:59:23 AM

Aloha members of the Board of Land and Natural Resources,

My name is Ginger Kwan, and I am a Kanaka 'Ōiwi who currently resides in Alameda, California. I am submitting this testimony as a non-resident of Hawai'i who cares deeply about Indigenous rights, cultural preservation, and environmental protection. I respectfully urge the BLNR to reject the U.S. Army's lease renewal for State-owned lands at Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation and support the return of these lands to the people of Hawai'i.

The Army's Final Environmental Impact Statement makes clear that the military's continued presence restricts cultural access and harms the ability of Native Hawaiians to connect with and care for these sacred lands. The access that is offered is burdened by strict conditions: permits, escorts, and limited dates that make it impossible for these communities to fulfill their cultural responsibilities. As someone who believes in justice, I stand in solidarity with the Native Hawaiian community's call for land return, cleanup, and restoration.

I call on the BLNR to prioritize restoration and cleanup of these lands, not further occupation. Please return them to community stewardship so Native Hawaiians and local residents can care for them as our kūpuna intended. The 'āina deserves healing, and our people deserve meaningful access without military barriers.

Mahalo for your time and consideration.

Sincerely,
Ginger Kwan
Alameda, CA 94501

From: [David Leake](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] U.S. Army's Final Environmental Impact Statement (FEIS)
Date: Wednesday, June 25, 2025 11:02:45 AM

Honorable BLNR Members,

I strongly urge you to REJECT the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho. Experts have identified this FEIS as deficient in many ways, and also explained why the related U.S. Army activities are harmful to Oahu.

Mahalo,
David W. Leake
Kaneohe, HI

From: [Nanea Lo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 11:13:53 AM

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

My name is Nanea Lo and I strongly urge you to REJECT this legally deficient Final Environmental Impact Statement (FEIS) for the Army's retention of lands on O'ahu.

Throughout the environmental review process, the Army has inexplicably ignored repeated comments and concerns raised by the Hawai'i community, including your own DLNR staff. As a result, this document fails to provide the information needed to determine potential impacts to streams, aquifers, native and endangered species, cultural sites, Native Hawaiian traditional and customary practices, and other critical public trust resources and constitutional rights. Thankfully, your staff has made the appropriate recommendation to reject the FEIS as insufficient under the law.

Please uphold the integrity of our environmental review and land use laws - *do not accept* this faulty and legally flawed document.

me ke aloha 'āina,

--

Nanea Lo (*she/they/o ia*) | Micro-influencer
Executive Committee | [Sierra Club of Hawai'i](#)
Board Member | [Hawai'i Worker's Center](#)
Granter | [Hawai'i People's Fund](#)
(808)444-1229
[LinkedIn](#)

"Some people say that Hawai'i will be a better place when Hawaiians no longer stand in the way of progress. But even these people must know that at this point, this will no longer be Hawai'i."- Jonathan Kay Kamakawiwo'ole Osorio. The Value of Hawai'i

From: [maheshi k](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] FEIS - agenda D-1
Date: Wednesday, June 25, 2025 9:26:58 AM

Aloha please please hold the army accountable to the law and reject this flawed FEIS. Our very lives depend upon it. Mahalo. Mari Kae
Sent from my iPad

From: [James Maioho](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] June 27th BLNR TESTIMONY
Date: Wednesday, June 25, 2025 8:47:57 AM

Please sign me up for Oral testimony and consider the following for written testimony.

The EIS clearly remains incomplete as it fails to truly address the scope and deep reach of the proposed use actions. It uses aged environmental data and to compound the Cultural Impact that generally occur due to lack of access, no true detailed survey has been done regarding these acres. This area is dense with historical data as well as potentially hundreds of our Iwi Kupuna who are directly impacted by ground or aerial actions on this soil.

Without fully understanding the real and potential dangers to complete cultural loss as a direct result of Military use- this "impact" study lacks the "impact" data and is INCOMPLETE and should be rejected on that basis. This is also clearly reflected in the Executive Summary.

Best Regards,

Ho'ilina Strategies

James J. Maioho

808-459-1313

Kahu of Mauna Ala, Puhokaina, Lunalilo and Lahaina

From: [Maria Maitino](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 9:59:22 AM

To the BLNR:

I am submitting written testimony to express my very strong request that the BLNR reject the US Army's Final Environmental Impact Statement (FEIS) for the Makua Military Reservation, Kahuku Training Area, and Poamoho.

Hold the army accountable to the law and REJECT this flawed FEIS.

The public trust doctrine requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources. The BLNR's core responsibility is to protect the interests of the present and future generations of beneficiaries of that trust.

This FEIS is so replete with deficiencies that the staff of the Department of Land and Natural Resources (DLNR) itself have declared it insufficient.

Thank you,

Maria Maitino

Kīlauea, HI

From: [Martha E. Martin](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Wednesday, June 25, 2025 10:17:02 AM

Please reject the Army's Final Environmental Impact Statement (FEIS) for continuing using land on Oahu.

This FEIS fails to protect Hawaii's land, water, and heritage.

As a Hawaii resident since 1932, I have sadly seen much degradation in the islands. I hope the remaining natural treasures can survive.

Please reject this FEIS for Oahu military use.

Aloha.

Ms. Martha E. Martin
40 Kunihi Lane #226
Kahului , HI 96732

From: [Mary Whispering Wind](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please, REJECT FEIS for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.
Date: Wednesday, June 25, 2025 11:58:38 AM

To the Board of Land and Natural Resources,

I am calling for the BLNR to **REJECT** the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.

This FEIS is so replete with deficiencies that the staff of the Department of Land and Natural Resources (DLNR) itself have declared it insufficient. It is woefully inadequate and should be rejected.

Mahalo for **Rejecting** this FEIS,

Mary Whispering Wind

From: [Danie McReynolds](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 9:35:35 AM

Please hold the Army accountable to the law, and to REJECT this flawed FEIS.

Thank you,

**Danie McReynolds
3273 Kalihiwai Rd
Kilauea HI 96754**

From: [Jeffrey Mermel](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1 - REJECT the FEIS
Date: Wednesday, June 25, 2025 11:43:19 AM

Aloha all:

Rarely have I read an FEIS so poorly prepared as this one submitted by the US Army.
It is woefully inadequate and should be rejected.

I understand that even the staff of the DLNR itself have declared it insufficient!

REJECT the FEIS.

Mahalo for your kind attention to this urgent matter.

Respectfully,
Jeffrey Mermel

From: [Laila Moiré-Selvage](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 10:42:31 AM

Written Testimony: **BLNR - Enough already! Please hold the US Army accountable to the law and REJECT this flawed FEIS.**

Mahalo,
Laila Moiré-Selvage
808-896-6561

From: [Katlyn Naea](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1"
Date: Wednesday, June 25, 2025 11:14:10 AM

To whom this may concern,

Please hold the Army accountable to the law, and to REJECT this flawed FEIS.

Thank you,
Katlyn Naea
Kaua'i

From: [Liz Nelson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] FEIS for Kahuku, Kawaihoa-Poamoho and Makua
Date: Wednesday, June 25, 2025 9:35:06 AM

Aloha Land Board Members,

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased land at Kahuku Training Area, Kawaihoa-Poamoho Training Area and Makua Military Reservation, and to urge the land board to reject the Army's EIS.

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. It is time to release military hold on these lands and allow their generational caretakers to begin the healing process.

Sincerely,
Elizabeth Nelson
Kaneohe

From: [Kealani Netane](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject FEIS Testimony
Date: Wednesday, June 25, 2025 10:48:30 AM

Aloha mai kākou,

I am writing to strongly encourage the Board of Land and Natural Resources to reject the army's environmental impact statement. As a Kanaka 'Ōiwi with ancestral ties to these places, it hurts to see our wahi pana be desecrated again and again as the army continues to misuse the land. It is the BLNR's duty to protect our land from that misuse and if the statement is accepted, then you will continue to be complicit in the desecration.

Me ke aloha,

Kealani Netane
knetane08@gmail.com

From: [Kaleopono](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the army's FEIS-agenda item D-1
Date: Wednesday, June 25, 2025 11:17:24 AM

The army isn't serious or credible. Reject it!

Kaleopono
aka Kōdō
aka Stephen S. 'Steve' Norris
kaleopono1@gmail.com
(808) 640-0114

From: [Joy Nuuhiwa](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in opposition to the approval of the Army FEIS 6.27.25
Date: Wednesday, June 25, 2025 8:51:48 AM

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

My name is Joy Nu'uhiwa. I am from Wai'anae, O'ahu and I am writing to express my strong **opposition** to the approval of the Army's Final Environmental Impact Statement (FEIS) for O'ahu's leased lands, including Kahuku, Kawaiola-Poamoho, and Mākua.

These places are not just empty, barren lands---they are wahi pana and wahi kūpuna---sacred, ancestral places. They are home to irreplaceable Native Hawaiian cultural sites, sacred burial sites, critical water sources, and some of Hawai'i's most endangered species. The Army has failed to conduct full archaeological and cultural surveys of the lands and their use has already caused environmental damage and desecration of sacred lands. As someone from Wai'anae, I feel incredible 'eha when thinking about the future of Mākua. The US has permanently damaged Mākua so badly. How can we trust them to be there for another 65 years, when they already refuse to clean up their mess and deem it too damaged to clean up their UXOs?

The DLNR has also recommended non-acceptance of this FEIS, as there is a clear lack of baseline data to determine and understand the extent of any impacts to natural, historical, and cultural resources. The FEIS the army has submitted evades Hawaii law by ignoring very obvious cumulative impacts and ignoring key alternatives such as no military use or shorter lease terms.

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

I urge you to be on the right side of history. It is unacceptable and wrong that anyone gets to flit around laws and regulations that were created to protect our 'āina. These safeguards exist for a reason. It is unacceptable and wrong that anyone treat the 'āina this way in the first place. There is no reason to damage 'āina so badly while calling it necessary for national security. They are simply not the rightful caretakers of the land. Demand the Army clean up their mess, rightfully restore the land to its natural state to begin a much-needed

process of healing and restoration, and get OUT. This starts with the rejection of the Army's FEIS.

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

A hiki i ke aloha 'āina hope loa.

Ke aloha 'āina,
Joy Nu'uhiwa

From: [Teresa P](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 10:40:46 AM

BLNR Chair and Committee members,

I reviewed the report submitted by the Army regarding ongoing leases for state owned land. The military is requesting renewal of the leases for training. I urge the Board to reject the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.

The FEIS contains so many errors and oversights, I can't fathom how they thought their work met even minimum standards. Failure to address current and future risk of ground water contamination is inexcusable. Equally concerning is the lack of transparency regarding cultural surveys.

I realize these are training areas, but due diligence is mandatory. I urge you to REJECT this FEIS. The military needs to adhere to the same rules as any organization wishing to lease state lands.

Respectfully submitted,
Teresa Parsons
Ahuimanu, Oahu



June 25, 2025

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

June 27, 2025, 9:00 a.m.

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

**Re: TESTIMONY IN STRONG OPPOSITION TO ACCEPTANCE OF THE FINAL
ENVIRONMENTAL IMPACT STATEMENT FOR THE U.S. ARMY'S
PROPOSED LAND RETENTION AT KAHUKU, KAWAIILOA-POAMOHU, AND
MĀKUA, O'AHU (ITEM D-1).**

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

Please accept these comments submitted by the Center for Biological Diversity (Center) in **STRONG OPPOSITION of Agenda item D-1**, the Final Environmental Impact Statement (FEIS) for the U.S. Army's proposed long-term retention of nearly 6,300 acres of State lands at Kahuku Training Area, Kawaiiloa-Poamoho Training Area, and Mākua Military Reservation. The Army's FEIS does not meet the requirements of Hawai'i Revised Statutes Chapter 343 or Hawai'i Administrative Rules § 11-200.1-28, and fails to adequately disclose or evaluate the severe environmental and cultural consequences of the proposed action. Based on the record before you, including the Department of Land and Natural Resources (DLNR) staff submittal, agency comments, and extensive public input, the Center respectfully urges the Board to reject the FEIS.

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

The Army's FEIS Fails to Meet HEPA Requirements

Pursuant to HAR § 11-200.1-28(a), an FEIS must "adequately disclose and describe all identifiable environmental impacts and satisfactorily respond to review comments." Yet in the Army's own documentation and through comments submitted by

DLNR divisions, it is clear this FEIS lacks the foundational information necessary for the Board to make an informed decision. As noted in the DLNR staff submittal:

“Given the consensus among the Divisions that the final EIS is insufficient due to a lack of baseline data for the Department, and therefore the Board, to determine and understand the extent of any impacts to natural, historical, and cultural resources, LD staff recommends that the Board not accept the final EIS as currently submitted.” (*DLNR Submittal D-1-1, p. 10 and 38*)

The FEIS lacks sufficient data to evaluate impacts to federally listed species, cultural sites, groundwater, or fire-prone landscapes. By law, this level of informational deficiency disqualifies the document from acceptance under HAR § 11-200.1-28(b)(2), which prohibits acceptance when “the document does not adequately disclose the environmental impacts of the proposed action.”

Biological Resources Are Undersurveyed and Underprotected

The FEIS admits that surveys for endangered species such as the ‘ōpe‘ape‘a (Hawaiian hoary bat), O‘ahu ‘elepaio, and numerous rare plants and snails were “limited or inconclusive” due to time and access constraints (Vol. 1, App. H, p. H-27). Despite this, the Army offers only speculative mitigation strategies and fails to establish binding commitments to avoid, minimize, or monitor harm.

Kawailoa and Poamoho contain some of the last lowland wet and mesic forests on O‘ahu, which are essential for species that exist nowhere else on Earth. These forests are also vulnerable to training-related fires and invasive species introduction. The Army acknowledges that “approximately 3,500 acres of Kawailoa-Poamoho burned in the 2021 wildfire, much of it native forest” (Vol. 2, p. 4-66), but fails to present a credible fire prevention or habitat restoration strategy.

The absence of adequate biological inventory and fire planning alone warrants rejection of this FEIS under HRS § 343-2 and HAR § 11-200.1-28, both of which require full disclosure of risks to environmental resources.

Cultural Resource Surveys Are Incomplete and Key Hawaiian Mo‘olelo Are Omitted

The FEIS’s treatment of cultural and archaeological resources is similarly deficient. Despite identifying “numerous known and suspected burial sites, heiau, agricultural terraces, and traditional trails” (Vol. 3, p. 5-14), the Army acknowledges that “only 30 percent of Mākua has been subject to systematic archaeological survey” (Vol. 3, p. 5-3). The State Historic Preservation Division (SHPD) found this unacceptable, noting:

“The significant unsurveyed acreage within KTA, MMR, and Poamoho may contain historical and cultural sites that remain unidentified. No consideration has been given to potential unidentified archaeological and cultural sites mentioned in

native Hawaiian traditions that could potentially be within these unsurveyed portions of the ROI.” (*SHPD Comments, DLNR Submittal D-1-1, Exhibit B*)

SHPD further criticized the Final EIS for excluding foundational mo’olelo such as the stories of Kelea, La’akainana (O’ahunui), and Pa’ahana, narratives that identify cultural and geographic landmarks within the project areas, including locations associated with ancient residences, fortified settlements, and heiau. Failure to incorporate these narratives or complete archaeological inventories means the FEIS does not satisfy HRS § 6E, Article XII, Section 7 of the Hawai’i Constitution, or the standards set forth in HAR § 11-200.1-28(a) for acceptable disclosure of cultural impacts.

Contamination and Fire Hazards Are Minimally Addressed

The Army’s long history of contamination at Mākua, Kawaihoa, and Kahuku, including unexploded ordnance (UXO), PFAS, and heavy metals, is well documented. Yet the FEIS merely states that “remediation activities are ongoing or planned as funding becomes available” (Vol. 2, p. 4-82), without any timeline, enforceable plan, or funding assurances.

These training areas overlay essential aquifer recharge zones and native forest ecosystems. Without a detailed and enforceable cleanup plan, the public and the environment remain at risk. This lack of specificity violates HEPA’s requirement to identify, evaluate, and mitigate harmful impacts to environmental and human health resources.

Lack of Meaningful Alternatives and Cumulative Impact Analysis

HEPA mandates that agencies present and evaluate a reasonable range of alternatives (HAR § 11-200.1-24), yet the Army dismisses the “No Action” alternative as infeasible without seriously considering phased withdrawal, conservation leasing, or restricted non-live-fire training options.

Likewise, the FEIS fails to meaningfully assess cumulative impacts of long-term military training, fire, contamination, species loss, and cultural desecration across the interconnected landscapes of O’ahu. The omission of a full cumulative impact analysis makes it impossible for the Board to weigh the true long-term consequences of continued military use.

The FEIS submitted by the U.S. Army fails to meet the legal standards required for environmental disclosure and decision-making under HRS Chapter 343 and HAR § 11-200.1-28. DLNR’s own Land Division, supported by comments from SHPD and other internal divisions, has already concluded that the document lacks sufficient data for a responsible Board decision.

Given the stakes, State conservation lands, sacred cultural landscapes, endangered species habitat, and public trust resources, the Board must uphold its constitutional and statutory duties and reject the Final Environmental Impact Statement. Mahalo for your consideration of these comments and mahalos the Board for their work to ensure the long-term protection, restoration, and return of these irreplaceable lands.

/s/ Maxx Phillips

Maxx Phillips, Esq.

Hawai'i and Pacific Islands Director, Staff Attorney

Center for Biological Diversity

1188 Bishop Street, Suite 2001

Honolulu, Hawai'i 96813

(808) 284-0007

MPhillips@biologicaldiversity.org

From: [Michael Plowman](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Subject: Testimony on Agenda Item D-1
Date: Wednesday, June 25, 2025 9:00:54 AM

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

My name is Michael Plowman, and I strongly urge you to REJECT this legally deficient Final Environmental Impact Statement (FEIS) for the Army's retention of lands on O'ahu.

Throughout the environmental review process, the Army has inexplicably ignored repeated comments and concerns raised by the Hawai'i community, including your own DLNR staff. As a result, this document fails to provide the information needed to determine potential impacts to streams, aquifers, native and endangered species, cultural sites, Native Hawaiian traditional and customary practices, and other critical public trust resources and constitutional rights. Thankfully, your staff has made the appropriate recommendation to reject the FEIS as insufficient under the law.

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

Please uphold the integrity of our environmental review and land use laws - *do not accept* this faulty and legally flawed document.

Mahalo nui for your consideration of this testimony.

Michael Plowman
'Ewa Beach

From: [Nora Pollard](#)
To: [DLNR.BLNR.Testimony](#)
Cc: tm.hawaiipeaceandjustice@gmail.com
Subject: [EXTERNAL] Direct Opposition to Acceptance of the Army's O'ahu Leased Lands FEIS
Date: Wednesday, June 25, 2025 10:13:41 AM

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

I am writing in direct opposition to the Army's Final Environmental Impact Statement (FEIS) for continued use of state lands at Kahuku Training Area (KTA), Kawaihoa-Poamoho, and Mākua Military Reservation (MMR).

Your own Land Division staff and the State Historic Preservation Division (SHPD) found that this FEIS fails to meet legal standards under HAR § 11-200.1-28(b)(2) and must be rejected. This is more than a technical issue — it reflects an ongoing pattern of harm and disregard for 'āina, culture, and the State's fiduciary responsibilities.

Why the FEIS Must Be Rejected:

1. No Baseline Data:

DLNR staff confirmed that key environmental and cultural data is missing. Without it, neither the Board nor the public can understand the full impacts — putting ecosystems, species, sacred sites, and watersheds at risk.

2. Incomplete Cultural Review:

The Army's Cultural Impact Assessment ignored significant mo'olelo like Kelea, Lā'ikanaka, and Pa'ahana. These stories are connected to the affected lands and deserve inclusion. The exclusion reflects a failure to engage Native Hawaiian knowledge and protocols with integrity.

3. Major Areas Unsurveyed:

Large areas of KTA, MMR, and Poamoho remain unsurveyed — possibly containing iwi kūpuna, wahi pana, and unrecorded cultural sites. Failing to survey these areas puts them in danger.

4. Ignores Future Harm:

Though framed as "administrative," the FEIS lays the groundwork for continued warfighting activities. It fails to assess cumulative and long-term impacts, dismissing potential harm rather than addressing it.

Legal Grounds for Rejection:

- **Lacks Required Information:** Baseline data is missing, making the FEIS legally and ethically insufficient.
- **Fails Chapter 343 Standards:** It does not fully assess impacts, consider real alternatives, or adequately respond to public and agency input.
- **Ignores SHPD Concerns:** Key feedback from SHPD — to include more stories, survey more land, and protect sacred sites — was disregarded.
- **Doesn't Consider Alternatives:** The Army only evaluated options that keep them on the land, ignoring community-led or conservation-based stewardship models.

Trust and Kuleana:

The State has a duty to protect Native Hawaiian cultural and natural resources. Accepting this FEIS would continue a legacy of military harm, ignore expert recommendations, and betray public trust. In alignment with your own staff's recommendation, I urge you to reject the Army's FEIS.

As you are aware, your fiduciary duty is to the people's of Hawai'i and you are required by law to make decisions that are in the best interest of us, our lands, waters, and natural resources— not to the United States Military and their missions of “national security” or “war readiness.” Stand for the ‘āina, for iwi kūpuna, and for the future of Hawai'i.

In Truth and Kuleana,
Nora Pollard
Honolulu, O‘ahu

From: [Sally Roberts](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Wednesday, June 25, 2025 9:05:08 AM

Hello members of the Board of Land and Natural Resources,

My name is Sally Roberts, and I am a resident of Seattle, Washington. I am submitting this testimony as a non-resident of Hawai'i who cares deeply about Indigenous rights, cultural preservation, and environmental protection. I am writing to respectfully urge the BLNR to reject the renewal of the U.S. Army's lease for State-owned lands at Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation.

The Army's Final Environmental Impact Statement makes clear that the military's continued presence restricts cultural access and harms the ability of Native Hawaiians to connect with and care for these sacred lands. The access that is offered is burdened by strict conditions: permits, escorts, and limited dates that make it impossible for these communities to fulfill their cultural responsibilities. As someone who believes in justice, I stand in solidarity with the Native Hawaiian community's call for land return, cleanup, and restoration.

Please do what is right: reject this lease renewal and support the return of these lands to Native Hawaiian stewardship. The future of Hawai'i's lands and people depends on decisions like this.

Thank you for your time and consideration.

Sincerely,

Sally Roberts (Seattle, WA)

From: [Jodi Robinson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Wednesday, June 25, 2025 9:35:12 AM

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

My name is Jodi Robinson and I strongly urge you to REJECT the Army's legally deficient Final Environmental Impact Statement (FEIS) for the retention of lands on O'ahu.

Many of the same concerns the Board raised in its rejection of the Pōhakuloa FEIS — including the lack of cultural and biological surveys, inadequate cultural consultation, and unaddressed land use compliance issues— are found again in this document. This FEIS also fails to address stream impacts, potential groundwater contamination, and necessary land remediation plans.

Accepting this FEIS would signal that our environmental laws, the public trust, and Native Hawaiian rights can be disregarded with no consequence.

Please uphold your trust responsibilities, the mission of your department, and the laws that protect our 'āina and our future. Reject the FEIS.

Mahalo nui for your consideration.

Sincerely,
Jodi Robinson
Nu'uuanu, O'ahu

From: [MICHELE RUNDGREN](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 11:26:17 AM

PLEASE! Hold the Army accountable to the law, and REJECT this flawed FEIS.

Aloha,

Michele RundrenKauai

From: [wiggly 808](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on agenda item D-1
Date: Wednesday, June 25, 2025 8:51:49 AM

Subject: Testimony on Agenda Item D-1

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

My name is Nathalie Sato and I strongly urge you to REJECT the Army's legally deficient Final Environmental Impact Statement (FEIS) for the retention of lands on O'ahu.

Many of the same concerns the Board raised in its rejection of the Pōhakuloa FEIS — including the lack of cultural and biological surveys, inadequate cultural consultation, and unaddressed land use compliance issues— are found again in this document. This FEIS also fails to address stream impacts, potential groundwater contamination, and necessary land remediation plans.

Accepting this FEIS would signal that our environmental laws, the public trust, and Native Hawaiian rights can be disregarded with no consequence.

Please uphold your trust responsibilities, the mission of your department, and the laws that protect our 'āina and our future. Reject the FEIS.

Mahalo nui for your consideration.

Sincerely,

Nathalie Sato

Sent from my iPhone

From: [Jenna Shafer](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Wednesday, June 25, 2025 11:49:21 AM

Aloha members of the Board of Land and Natural Resources,

My name is Jenna, and I am a resident of Honolulu, O'ahu. I am submitting testimony in **strong opposition** to renewing the U.S. Army's lease for State-owned lands at Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation. I respectfully urge the BLNR to reject the lease renewal and support the return of these lands to the people of Hawai'i, nā Kānaka 'Ōiwi.

The Army's own Final Environmental Impact Statement confirms what our communities have long known: military control has severely limited cultural access and harmed our ability as Kānaka 'Ōiwi and Hawai'i residents to care for and connect with these places. Despite policies for cultural access, the reality is that access is highly restricted — requiring advance requests, military escorts, and limiting who, when, and where we can go. This prevents us from practicing our traditions, stewarding the land, and teaching future generations. The continued lease would only extend these harms.

I call on the BLNR to prioritize restoration and cleanup of these lands, not further occupation. Please return them to community stewardship so Native Hawaiians and local residents can care for them as our kūpuna intended. The 'āina deserve healing, and our people deserve meaningful access without military barriers.

Mahalo for considering my testimony,
Jenna Shafer
Honolulu, O'ahu

From: [Eliel Starbright](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] I am calling on the BLNR's reject the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.
Date: Wednesday, June 25, 2025 11:52:29 AM

I am calling on the BLNR to reject the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho. Eliel, Kapaa,96746

From: [Serenity Tedesco](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Wednesday, June 25, 2025 9:41:48 AM

Aloha members of the Board of Land and Natural Resources,

My name is Serenity Tedesco, and I am a resident of Largo, Florida, USA. I am submitting this testimony as a non-resident of Hawai'i who cares deeply about Indigenous rights, cultural preservation, and environmental protection. I am writing to respectfully urge the BLNR to reject the renewal of the U.S. Army's lease for State-owned lands at Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation.

The Army's Final Environmental Impact Statement makes clear that the military's continued presence restricts cultural access and harms the ability of Native Hawaiians to connect with and care for these sacred lands. The access that is offered is burdened by strict conditions: permits, escorts, and limited dates that make it impossible for these communities to fulfill their cultural responsibilities. As someone who believes in justice, I stand in solidarity with the Native Hawaiian community's call for land return, cleanup, and restoration.

Please do what is right: reject this lease renewal and support the return of these lands to Native Hawaiian stewardship. The future of Hawai'i's lands and people depends on decisions like this.

Mahalo for your time and consideration.

Sincerely,

Serenity
Largo, Florida, USA

From: [Michele Thornton](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Renewal of military bases in the Hawaiian Islands
Date: Wednesday, June 25, 2025 10:40:41 AM

As a resident of Hawaii, I am asking that the military leases not be renewed. It is time to restore the land.

Mahalo,

Michele J. Thornton

From: [Christine Trecker](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 11:46:11 AM

I expect and urge the BLNR to uphold its responsibility to properly manage Hawaii's natural and cultural resources. The US Army's FEIS document falls extremely short of making its case and **must be rejected**.

Thank you,

Christine Trecker

1212 Nuuanu Ave.

Honolulu, HI 96817

From: [evolved](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Wednesday, June 25, 2025 11:56:56 AM

Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation**, and to urge the land board to reject the Army's EIS.

These places are not just a piece of land—they are **wahi pana**, sacred and beloved places that hold the stories and legacy of Kānaka Maoli. They are sacred burial sites, endangered species habitats, and the birth stands of generational families. Decades of misuse to 'āina occupied by the Army has proven that they are not capable of being the stewards of these significant wahi pana.

KAHO'OLawe STILL SUFFERS.

Additionally, the military training activities of this scale are simply not compatible with the intention of conservation, upholding cultural integrity, and **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 disclosure of Military activities on leased lands adjacent to federal lands
- Restrictive cultural access policies hindering Kānaka Maoli cultural practices and access to numerous historical and sacred sites
- The approval of the EIS ultimately conflicts with the BLNR's constitutional duty to mālama 'āina

I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by **rejecting the Army's FEIS** for Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation. It is time to release military hold on these lands, and allow their generational caretakers to begin the healing process.

Sincerely,

Susan M. Veno

From: [Nākai‘elua Villatora](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] TESTIMONY FOR SUBMITTAL : AGENDA ITEM O‘AHU ARMY FINAL EIS June 26, 2025
Date: Wednesday, June 25, 2025 11:37:58 AM

**[NOTICE TO AGENT IS NOTICE TO PRINCIPAL, NOTICE TO PRINCIPAL IS
NOTICE TO AGENT]**

Record upon receipt TESTIMONY of Ho‘oilina ‘o Hawai‘i Nei, Nākai‘elua Villatora submitted on June 25, 2025. Ke kū nei kānāwai no laila.

From: [Valerie Weiss](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.
Date: Wednesday, June 25, 2025 10:16:06 AM

Please reject the FEIS which is inadequate.

Mahalo.

Valerie Weiss

Kapaa

From: [joe woo](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Wednesday, June 25, 2025 10:40:33 AM

Please, hold the Army accountable to the law, and to REJECT this flawed FEIS. Say NO to renewing of land leases at Pohakuloa, Kahuku, Kawaihoa-Poamoho, and Makua. We must also refuse expansion at Barking Sands and the bombing of Ka'ula Island

Support our American troops by showing the importance of national security, rejection of the endless expansion of the U.S. war machine, and protection of our natural environment, cultural resources, and endangered species: are values that can and DO, co-exist.

The U.S. is by far, already the largest exporter of weapons worldwide. We have more military bases in more countries than any other. No more expansion of military bases.

I'm a resident of Maui and a voting citizen. Mahalo for your consideration.

Joe Woo Jr.