

To: Hawai'i Board of Land and Natural Resources  
From: Kēhaunani Abad  
Re: Testimony Opposing Army Land Retention FEIS - Agenda Item D-1  
Date: June 26, 2025

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

I am submitting this testimony to strongly urge the Board to **reject** the Army's Final Environmental Impact Statement (FEIS) for continued land retention on O'ahu. This document is incomplete, misleading, and fails to meet the standards required under Hawai'i's environmental review laws. But beyond its legal deficiencies, it reflects a deeper, ongoing pattern of desecration and disregard—toward 'āina and wai that are sacred to Kānaka 'Ōiwi and vital to the health and future of all who call our pae 'āina home.

'Āina is not a training ground. Wai is not expendable.

Despite clear and pressing concerns raised by the Commission on Water Resource Management (CWRM), the Army's FEIS refuses to adequately account for the risks of groundwater contamination. It does not identify existing pollution sources, assess the cumulative impacts of past military activities, or offer a credible, enforceable plan for remediation. As CWRM has noted, the FEIS fails to include even basic information about the locations and nature of potential hazards, such as oil leaks, PFAS, unexploded ordnance, and lead residue. Without these facts, neither the BLNR nor the public can make a sound, informed decision.

This cavalier attitude toward contamination and desecration is not new—it reflects a broader military culture rooted in negligence and a lack of accountability.

We are already living through the aftermath of the disaster at Kapūkaki, where jet fuel and PFAS from military storage tanks contaminated O'ahu's primary aquifer prompting over 27,700 people to seek medical care in the wake of these disasters. This is what happens when the military is trusted without oversight: they hide their wrongs, deny responsibility, and avoid meaningful redress. Institutions that operate with such disregard cannot be granted further license to cause harm.

The normalcy of military contamination is not theoretical—it is visible, measurable, and ongoing:

- At Radford High School and Makalapa Elementary, students attend schools built atop a World War II military dump site, only partially remediated.
- At Pu'uloa, keiki play in sand near the Pu'uloa Rifle Range that contains dangerous levels of lead—yet military officials claim “no further action” is warranted.

- At Schofield and Pōhakuloa, the Army used depleted uranium spotting rounds, releasing windborne toxins and exposing communities to long-term health hazards.
- At Makua and Pōhakuloa, live-fire training has scarred cultural landscapes, ignited fires, and driven rare species toward extinction.

And yet, the Army claims that cleanup is “outside the scope” of its FEIS. This illustrates not only a failure of environmental due diligence, but a fundamental failure of kuleana. Any land returned to the state without a comprehensive, accountable remediation plan is a burden, not a benefit.

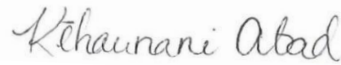
This is about more than environmental compliance—it is about aloha ‘āina. The areas in question are not “unused parcels” or neutral terrain. They are storied landscapes, embracing iwi kūpuna, wahi pana, native species, and the living practices of ‘Ōiwi communities. To approve this FEIS would signal that training for war is a higher priority than protecting the living systems that sustain us all.

The Army’s FEIS fails the test of transparency, of restoration, and of pono. It should not move forward.

Please stand for ‘āina. Stand for wai. Stand for our future generations.

**Reject this FEIS.**

Me ke aloha a me ka ha‘aha‘a,

A handwritten signature in dark ink, reading "Kēhaunani Abad". The script is fluid and cursive, with the first name being more prominent.

Dr. Kēhaunani Abad, PhD

**From:** [Pua'ena Ahn](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] 6/27/25 Meeting Item D-1 Testimony - NON ACCEPTANCE  
**Date:** Thursday, June 26, 2025 8:04:21 AM

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Aloha Chair Chang and Board,

I am writing in my personal capacity to testify in favor of Non-Acceptance of the US Army Final EIS based on Staff Recommendations and comments. Mahalo to Land Division, SHPD, DOFAW, OCCL, DAR and CWRM for their due diligence.

Mahalo,  
Pua'ena Ahn

**From:** [amihan.dagat@protonmail.com](mailto:amihan.dagat@protonmail.com)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 12:04:55 AM

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

My name is Dianne Deauna 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,

Dianne

Sent with [Proton Mail](#) secure email.

**From:** [Adrienne Antonsen](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject FEIS for Army leased lands on Oahu  
**Date:** Thursday, June 26, 2025 8:33:19 AM

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Hello,

Please reject the Army's final environmental impact statement for Oahu leased lands (Makua, Poamoho, Kahuku), for all of the reasons included in DLNR's Staff Submittal on Item D1 and their recommendation to reject the FEIS.

Mahalo,

Adrienne Antonsen  
Entomologist  
Honolulu, HI 96816

**From:** [Kalani Baer](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Army eis written testimony  
**Date:** Thursday, June 26, 2025 7:23:18 AM

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Aloha blnr board members,

Mahalo for accepting testimony from our Hawaii community. I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **Kahuku Training Area, Kawailoa-Poamoho Training Area, and Mākua Military Reservation**, and to urge the land board to reject the Army's EIS.

I know many others will list specific insights into why Army retention of these lands is harmful to humans and aina. My personal statement really has to do with the fact that I am a descendant of Mākua....I am part of the Helenihi ohana and we are one of many that were forced out decades ago so the Army could "train". Much of our family has literally had to move off island since, we ended up impoverished without land and home. Maybe these are just words to you or maybe you have experienced something similar in your family....either way I am writing in to tell you that these decisions have affected Hawaiians for generations upon generations. I am a living result of those impacts and have watched my grandmother, aunts, uncles, cousins, siblings and father suffer as a result of the loss of our connection to our lāhui and to aina. Our land was literally stolen and "rented" to the American military for \$1. How is this justified? How could this have happened? Why would we continue to allow historical injustice when we have a precious opportunity to change course?

Please consider what giving the Army lands that belong to native Hawaiians does to native Hawaiian people.

Mahalo,  
Kalani

**From:** [Melvin Bala](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 9:51:56 AM

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Aloha, My name is "Jensen Bala" and I have been a member of the dirtbike community for "10" years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Sent from my iPhone

**From:** [Lauren Ballesteros](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony Agenda Item D-1  
**Date:** Thursday, June 26, 2025 4:29:08 AM

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

Please REJECT this FEIS.

As highlighted by the disastrous Red Hill Fuel Tank fuel leaks, and the continual discovery of PFAS in groundwater under former and current defense sites, there have been many recent and historical instances of misplaced military priorities neglecting the need to safeguard our life-giving wai. This deficient FEIS fails to recognize this longstanding problem, and lacks requested data as to how past and potential future military activities under the proposed action may contaminate our groundwater.

Oil leaks from vehicles, lead dust and heavy metals, PFAS, and unexploded ordinance are just some of the ways that our public trust water resources could be impacted by the proposed retention action. The BLNR and regulators must therefore be informed as to what and where these contamination sources are - in order to understand, and ultimately prevent, potential impacts to our precious wai.

The BLNR must remember the harsh lessons of Kapūkakī, and refuse to accept an FEIS that does not provide a full accounting of potential threats to our wai - before our history of water contamination repeats itself yet again.

Thank you for your consideration of my testimony.

Lauren Ballesteros-Watanabe



## **Agenda Item D-1 – Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation**

Aloha Chairperson and Members of the Board,

My name is Leimaile Barrett and I am a member of Hui Aloha Aina o Honolulu. I am writing to urge you to reject the Army's Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaihoa-Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai'i law and your duty to protect public trust lands.

### **Environmental and Health Hazards**

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. At Mākua, promised Phase 2 testing hasn't been done, and no sampling occurred at Kawaihoa-Poamoho. Risks to health, 'āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There's no wildfire plan or climate adaptation strategy—issues even the EPA flagged. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

### **Disregard for Culture, Ecosystems, and Accountability**

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and offers no clear protocols for cultural access. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup.

### **Failure to Consider Alternatives**

The Army failed to evaluate meaningful non-military or reduced-use alternatives, despite repeated calls from the public, Native Hawaiian communities, and agency reviewers. Instead, the FEIS focuses solely on maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship.

This FEIS is not a genuine assessment—it's a justification for continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. I urge you to vote no and reject this FEIS for its failure to address contamination, cultural and ecological harm, and for violating the public trust.

Mahalo for your time and for upholding your kuleana to protect our 'āina.

Leimaile Barrett  
Hui Aloha Aina o Honolulu

**From:** [Ian Battin](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 10:05:40 AM

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Aloha, My name is Ian Battin and I have been a member of the dirtbike community for my entire life, and in Kahuku for 2 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Growing up I watched as some of my favorite riding areas were shut down and I would hate to see that happen here. The dirtbike community gets so much more from this area than the military. It's an amazing place for recreation and spending time with friends and family and I wish I could go all the time.

**From:** [Carson Bechtel](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 10:49:22 AM

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

*My name is Carson 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,  
Carson B, PE*

**From:** [Erica B](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the U.S. Army's Final Environmental Impact Statement (FEIS)  
**Date:** Thursday, June 26, 2025 10:38:13 AM

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Hello,

I'm writing to urge the BLNR to reject the Army's FEIS and protect sacred lands from further military destruction because:

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

Please do what's right for our land and the people who take care of it.

Best,  
Erica

**From:** [Jazzmin C](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Kahuku, Kawaihoa-Poamoho, and Mākua  
**Date:** Thursday, June 26, 2025 8:21:50 AM

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Aloha kākou,

My name is Jazzmin Cabanilla and I am writing from Hawai‘i Moku on behalf of my keiki and my mo‘opuna (who currently exist in spirit and thought.)

I am writing to oppose the acceptance of ALL FEIS, Final Environmental Impact Statements for the retention of training lands and areas in Kahuku, Kawaihoa-Poamoho, and Mākua we petition the BLNR to move the Army to immediately cease and desist all operations on these lands, and all of our pae ‘āina.

I ask the BLNR to redirect their focus and the Army’s focus to mālama ‘āina and for the BLNR to honor the Supreme court’s ruling and to find the courage to petition the Army to draft and implement a golden standard plan of action for mass clean up efforts of existing UXO sites within our entire pae ‘āina by 2035 (10 years).

To me, enough is enough and I encourage every single one of you BLNR board members/trustees to remember that you have a soul kuleana to our Hawaiian people -- until the last aloha ‘āina including my mo‘opuna and yours (Kū‘ē Petitions)

In closing, as you all know Uncle Walter Ritte and Uncle Richard Sawyer were among the few individuals who occupied Kaho‘olawe in the 1970’s. During their time on Kaho‘olawe they documented their experiences in their personal diaries which is now in book form... I encourage - no I challenge all of you --- to take some time to find Na Mana‘o Aloha o Kaho‘olawe, to read their words, to re-live their hopes, fears and dreams for our Hawai‘i and to remember our mama ‘āina when you courageously stand in your truth and oppose the FEIS and the desecration of our ‘āina.

Me ke aloha,

‘Ohana Pu‘uohau Cabanilla

**From:** [mark.cagaoan](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Kahuku Motocross Track  
**Date:** Thursday, June 26, 2025 5:29:18 AM

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Aloha, My name is Mark Cagaoan and I have been a member of the dirtbike community for 15 years.

**From:** [Timothy Caires](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Kahuku Dirt Bike Park Access  
**Date:** Thursday, June 26, 2025 8:20:02 AM

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Aloha,

My name is Tim Caires and I have been a member of the dirtbike community for 20+ years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. The more developed Oahu becomes, the harder it is for residents to find areas to enjoy outdoor recreation. This is not just for dirt bike riders. Hikers, hunters, bicyclists and other sports enthusiasts all need legal areas to enjoy nature. Please do not allow another area to be closed off to the public as so many have been due to development or wealthy land owners restricting access to state or public land.

I am also concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will resort to using trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Mahalo,

Tim Caires  
808-382-6951

**From:** [Charlene Casserley](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda D-1  
**Date:** Thursday, June 26, 2025 9:42:52 AM

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I am writing to request that the FEIS submitted be rejected by the DLNR.

The FEIS is insufficient and past experiences with the military has shown them to be delinquent cleaning up their messes.

Thank you for the opportunity to share my views. Please do the right thing for Hawaii residents and the AINA.

Aloha and mahalo,  
Charlene Casserley



**From:** [Clifford Chang](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda item D-1: testimony Against your acceptance of the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākuā Military Reservation, Kahuku Training Area, and Poamoho  
**Date:** Thursday, June 26, 2025 5:05:57 AM

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Aloha Board of Land and Natural Resources:

I am writing to you to ask that you **do not** accept the FEIS for the Mākuā Military Reservation, Kahuku Training Area, and Poamoho, as submitted by the USAG-HI and IMCOM, as being woefully inadequate, and to hold the US Army accountable to the law.

I am Clifford Chang, submitting testimony as a Hawai`i resident private citizen, now living in Honolulu and a past resident of Hilo.

I have had the chance to briefly read and review sections of the staff report of the Department of Land and Natural Resources Land Division to the Board, dated June 27, 2025. I fully support their conclusions that that FEIS is not adequate, and ask that you follow their recommendation that the Board

**"Determine that the final EIS does not comply with applicable law pursuant to HAR 11-200.1-28(b)(2) and therefore does not adequately disclose the environmental impacts of the proposed action, and thus does not accept the final EIS as submitted by USAG-HI and IMCOM."** (page 39)

Please do what is right for Hawai`i's land, people and culture and in fulfilling your responsibility in managing our natural and cultural resources by rejecting this FEIS as inadequate and not acceptable.

Thank you for this opportunity to testify.

Aloha,  
Clifford Chang

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4924 Wa`a Street  
Honolulu HI 96821-1446

Cell: (808) 347-8035  
<cliffordchangconsulting@yahoo.com>  
=====

**From:** [sally chew](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Support the rejection to Army FEIS 6/27/25  
**Date:** Thursday, June 26, 2025 6:52:51 AM

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Aloha Chairperson & DLNR team,

I support the points made in the DLNR Staff Submittal on Item D1 and the Staff recommendation to reject the FEIS.

I have the honor to work in conservation in the Wai'anaes. There are a considerable number of species **endemic** to certain hills/valleys within the mountain range near these areas. Not to mention the coral reefs sitting just below two of these training areas. Protecting these spaces are critical to conserving global-scale biodiversity, in addition to their cultural significances. Please continue to holdfast (and expand) conservation districts!

Refuse the military's request for rule amendments to use conservation lands. Considering they have been unable to accurately report their environmental impact on the land they lease, they should be rejected from further expanding their undocumented impact.

I urge you to hear the community and represent our voices. Mahalo for your consideration,

Sally Chew

**From:** [jacob.chinn](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1 - Reject FEIS on O'ahu's Leased Lands  
**Date:** Thursday, June 26, 2025 7:56:45 AM

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Aloha Chairperson and Members of the Board,

My name is Jacob Chinn and I live in Kalihi Valley. I am writing to urge you to reject the Army's Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaioloa-Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai'i law and your duty to protect public trust lands.

#### Environmental and Health Hazards

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. At Mākua, promised Phase 2 testing hasn't been done, and no sampling occurred at Kawaioloa-Poamoho. Risks to health, 'āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There's no wildfire plan or climate adaptation strategy—issues even the EPA flagged. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

#### Disregard for Culture, Ecosystems, and Accountability

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and offers no clear protocols for cultural access. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup.

#### Failure to Consider Alternatives

The Army failed to evaluate meaningful non-military or reduced-use alternatives, despite repeated calls from the public, Native Hawaiian communities, and agency reviewers. Instead, the FEIS focuses solely on maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship.

This FEIS is not a genuine assessment—it's a justification for continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. I urge you to vote no and reject this FEIS for its failure to address contamination, cultural and ecological harm, and for violating the public trust.

Mahalo for your time and for upholding your kuleana to protect our 'āina.

Jacob

**From:** [Jennifer Chiwa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1, 6/27/25 Meeting, Testimony For Rejection of U.S. Army's FEIS  
**Date:** Thursday, June 26, 2025 12:59:11 AM

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Aloha Chairperson Chang and Members of the Board of Land and Natural Resources.

I strongly oppose the U.S. Army's retention of leased lands at Kahuku Training Area, Kawaihoa- Poamoho Training Area and Makua Military Reservation, and request that the Board reject the Army's Final Environmental Impact Statement (FEIS) for these locations.

As with Pohakuloa, these places are wahi pana with sacred burial sites and endangered species habitats. As with Pohakuloa, using these areas for live fire and bombing is wholly inappropriate and does not contribute to the preservation of the land, flora and fauna, and the culture of these areas.

Please reject the Army's FEIS for Makua Military Reservation, Kahuku Training Area and Kawaihoa - Poamoho Training Area. As with Pohakuloa, please help these areas to heal and flourish.

Mahalo.

Jennifer Chiwa  
Makiki and life long resident of Oahu

**From:** [Barryn Chun](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [HAA Honolulu](#)  
**Subject:** [EXTERNAL] Agenda Item D-1 – Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaioloa-Poamoho Training Area, and M...  
**Date:** Thursday, June 26, 2025 8:47:49 AM

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Aloha Chairperson and Members of the Board,

My name is Barryn Chun and I am a member of **Hui Aloha ‘Āina o Honolulu**. I am writing to urge you to reject the Army’s Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaioloa–Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai‘i law and your duty to protect public trust lands.

### **Environmental and Health Hazards**

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. At Mākua, promised Phase 2 testing hasn’t been done, and no sampling occurred at Kawaioloa–Poamoho. Risks to health, ‘āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There’s no wildfire plan or climate adaptation strategy—issues even the EPA flagged. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

### **Disregard for Culture, Ecosystems, and Accountability**

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and offers no clear protocols for cultural access. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup.

### **Failure to Consider Alternatives**

The Army failed to evaluate meaningful non-military or reduced-use alternatives, despite repeated calls from the public, Native Hawaiian communities, and agency reviewers. Instead, the FEIS focuses solely on maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship.

This FEIS is *not* a genuine assessment—it’s a justification for continued occupation and

degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. I urge you to vote no and reject this FEIS for its failure to address contamination, cultural and ecological harm, and for violating the public trust.

Mahalo for your time and for upholding your kuleana to protect our 'āina.

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

**From:** [tpcorpuz@yahoo.com](mailto:tpcorpuz@yahoo.com)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda item D-1  
**Date:** Thursday, June 26, 2025 10:25:57 AM

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

**I urge you to hold the Army accountable to the law, and to REJECT this flawed FEIS.**

**Mahalo for your consideration.**

**Sincerēy,  
Teri Corpuz  
Pukalani, Maui**

Sent from my iPhone



**From:** [Abram Correia](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, June 26, 2025 9:01:42 AM

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Aloha, My name is Abram Correia and I have been a member of the dirtbike community for 20 years plus.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

**From:** [Shore Crawford](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Waialeale Motocross Park- Kahuku  
**Date:** Thursday, June 26, 2025 5:40:53 AM

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Aloha,

My Name is Shore and I have been riding and apart of this community for about 20 yrs now. Kahuku Motocross Park has been one of the greatest community to be apart of and is like home away from home. Like enjoyment at the beach is like the same for us dirt bike riders. This is the only legal place for us to ride and enjoy the sport. With our community already being limited to days of riding due to limited operational hours. With the concern of it becoming the primary training grounds, may lead to more frequent closures, and or a permanent closure. This being said by doing that action it will lead to us riders to be place less for riders to ride legally. No safe, trusting and enjoyable place for the dirt bike community to ride legally. On this behalf, I urge the board to consider the issue and establish safeguards for Waialeale Motocross Park- Kahuku to remain open and accessible to myself and our dirt bike community, with limited military closures.

**From:** [Nancy Hall](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject US Army FEIS  
**Date:** Thursday, June 26, 2025 9:06:21 AM

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Aloha, As a lifetime resident of Hawai'i I am very concerned about what we are leaving our children and grandchildren as well as the next generations. Many areas in our islands are poisoned by the actions of the military. Enough already. The indigenous people of Hawai'i have been dislocated from much of their land and have had to relocate away from their homeland. Enough already. The military has proven again and again to not be good stewards of the lands. There is still ordinance on Kaho'olawe that hasn't been cleaned up. So I am urging you the BLNR to REJECT the US Army's FEIS for Makua Military Reservation, Kahuku Training Area and Poamoho. We will continue to fight every step of the way so that restoration can begin. Enough already.

Nancy Cross-Hall

**From:** [Lynell DaMate](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Military Land Leases  
**Date:** Thursday, June 26, 2025 9:02:15 AM

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Aloha Chair Chang and members of the BLNR board,

I am writing this testimony to advocate the rejection of the FEIS.

My family has lived on this island for a 100 years. I was born in Kahuku. I have lived in this area all my life. I will be 69 years old. My residence for the past 25 years is in the Kaunala Ahupua'a which is below KTA 1.

I have and so has my 'Ohana witnessed and observed the coming and going of the army up the Motocross Track road.

I have many concerns and stories to share tomorrow. So as not to be redundant, I will share from a personal point of view, a different perspective.

Looking forward.

Mahalo,  
Aunty Lynell  
In Solidarity

**From:** [Mara Davis](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 9:17:30 AM

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*My name is Mara Davis 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.*

*Sincerely,  
Mara Davis*

**From:** [Paul Dolnick](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.  
**Date:** Thursday, June 26, 2025 10:51:56 AM

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See subject.

The DLNR report of Acceptance or Non-Acceptance of the Draft EIS for the Army Training Land Retention of State Lands at KTA, Poamoho, and MMR recommends non-acceptance. That report would be attached, but it is too large to send.

Please reject the EIS as submitted. The Army MUST defend our aina as well as our people.

Paul Dolnick

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

**From:** [Charmaine Ecraela](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands  
**Date:** Thursday, June 26, 2025 9:25:03 AM

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Aloha members of the Board of Land and Natural Resources,

My name is Charmaine Ecraela, and I am a resident of Ewa Beach, 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 Kānaka 'Ōiwi from practicing their 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,  
Charmaine Ecraela  
Ewa Beach, O'ahu

**From:** [Ian Jaron Padilla Eda](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 10:07:34 AM

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Aloha, My name is "Ian Eda " and I have been a member of the dirtbike community for "10+" years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Sent from my iPhone



**From:** [rose elovitz](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [tm.hawaiipeaceandjustice@gmail.com](mailto:tm.hawaiipeaceandjustice@gmail.com)  
**Subject:** [EXTERNAL] Direct Opposition to Acceptance of the Army's O'ahu Leased Lands FEIS  
**Date:** Thursday, June 26, 2025 12:28:11 AM

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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 Mākuā 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. A true EIS would outline the local and global impacts warfare activities have on our environment. In the midst of a climate crisis we cannot afford to ignore the world's #1 polluter's actions.

### **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.” Utilize your power to stand for the ‘āina, for iwi kūpuna, and for the future of Hawai‘i.

In Truth and Kuleana,  
Rose Elovitz  
Honolulu, O‘ahu, Jewish Voice For Peace Hawai‘i  
805-729-0381

**From:** [Lily Engle](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1 – Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and M...  
**Date:** Thursday, June 26, 2025 7:19:55 AM

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Aloha Chairperson and Members of the Board,

My name is Lily Engle and I am a member of Ka Ahahui Aloha 'Āina o Honolulu. I am writing to urge you to reject the Army's Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaihoa–Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai'i law and your duty to protect public trust lands.

### **Environmental and Health Hazards**

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. At Mākua, promised Phase 2 testing hasn't been done, and no sampling occurred at Kawaihoa–Poamoho. Risks to health, 'āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There's no wildfire plan or climate adaptation strategy—issues even the EPA flagged. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

### **Disregard for Culture, Ecosystems, and Accountability**

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and offers no clear protocols for cultural access. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup.

### **Failure to Consider Alternatives**

The Army failed to evaluate meaningful non-military or reduced-use alternatives, despite repeated calls from the public, Native Hawaiian communities, and agency reviewers. Instead, the FEIS focuses solely on maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship.

This FEIS is not a genuine assessment—it's a justification for continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. I urge you to vote no and reject this FEIS for its failure to address contamination, cultural and ecological

harm, and for violating the public trust.

Mahalo for your time and for upholding your kuleana to protect our 'āina.

Lily Engle

Hui Aloha 'Āina o Honolulu



## The Senate

STATE CAPITOL  
HONOLULU, HAWAII 96813

June 26, 2025

### TESTIMONY OF SENATOR KURT A. FEVELLA SENATE DISTRICT 20

BEFORE THE BOARD OF LAND AND NATURAL RESOURCES  
JUNE 27, 2025, AGENDA ITEM D-1

#### RE: OPPOSITION TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR ARMY TRAINING LAND RETENTION OF STATE LANDS AT KAHUKU TRAINING AREA, KAWAIOLOA-POAMOHO TRAINING AREA, AND MĀKUA MILITARY RESERVATION

Aloha Chair Chang and Members of the Board,

Thank you for the opportunity to testify in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) submitted by the United States Army concerning the retention of State lands at Kahuku Training Area, Kawaioloa-Poamoho Training Area, and Mākua Military Reservation on the island of Oʻahu.

For decades, these lands—rich in cultural, environmental, and spiritual significance—have been subjected to military use without adequate environmental safeguards, community consent, or transparent oversight. The communities near these training areas, including Native Hawaiian families and long-standing residents, continue to bear the burden of environmental degradation, restricted access to traditional lands, and health concerns related to military activity.

The Final EIS fails to meaningfully address the cumulative impacts of continued military use on fragile ecosystems, endangered species, water quality, and cultural sites. It also inadequately incorporates the voices and testimonies of community members who have long called for the restoration of these lands to public and cultural stewardship.

I urge the Board to prioritize the long-term environmental health and cultural integrity of these lands over continued militarization. By rejecting the Final EIS, the Board has the opportunity to stand with the people of Hawaiʻi who demand accountability and a just transition of these lands back to public trust.

June 26, 2025  
Page 2 of 2

The future of our land should reflect our values of aloha 'āina—love and stewardship for the land—not the continued occupation for destructive purposes. I respectfully urge you to reject this Final EIS and protect the people, place, and purpose of these sacred lands.

Mahalo for your time and consideration.

Mahalo,

A handwritten signature in black ink that reads "Kurt Fevella". The signature is fluid and cursive, with the first name "Kurt" and last name "Fevella" clearly distinguishable.

Senator Kurt Fevella  
State of Hawaii, District 20

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State Capitol, Room 231  
415 S. Beretania Street,  
Honolulu, HI 96813  
Phone: (808) 586-6360  
Fax: (808) 586-6361  
[senfevella@capitol.hawaii.gov](mailto:senfevella@capitol.hawaii.gov)

**From:** [kapulei flores](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject Armys FEIS  
**Date:** Thursday, June 26, 2025 12:21:31 AM

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Aloha,

I am writing to urge BLNR to REJECT the Armys FEIS regarding Kahuku, Kawailoa-Poamoho, and Mākua. These places are habitat for endangered species, home to sacred burial sites, and critical water sources. The Armys use has already caused environmental damage and desecration to these places and will continue to destroy all of our natural resources and environment if you allow them. Please help protect our islands and sacred places so that we will have a home that can provide for us, our communities, and the future generations. More than ever we need to take care of our resources and the land that we call home.

Mahalo



June 26, 2025

State of Hawaii  
Department of Land and Natural Resources  
Kalanimoku Building  
1151 Punchbowl Street, 1st Floor  
Honolulu, HI 96813  
Attn: Board of Land and Natural Resources

Re: June 27th, 2025 Meeting; Agenda Item D-1; Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, Island of O'ahu, Tax Map Keys (TMKs) (1) 5-8-002:002; 5-9-006:026; 72-001:006; 6-9-003:001 (por.); 8-1-001:008 and portions of 007 & 012; and 8-2001:001, 022, 024, 025, and portions of 002.

Dear Chair Chang and Members of the Board:

On behalf of the Hawai'i Alliance for Progressive Action, I am writing to express our 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 the public trust. Enough is enough.

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

- Inadequate Environmental and Cultural Impact Analysis: **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.

- 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 and uphold the public trust: **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.

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 for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anne Frederick', with a stylized, flowing script.

Anne Frederick,  
Executive Director

## Testimony of Hui Aloha 'Āina o Hilo

June 26, 2025

Re: Agenda Item D: 1. Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, Island of O'ahu, Tax Map Keys (TMKs) (1) 5-8-002:002; 5-9-006:026; 7-2-001:006; 6-9-003:001 (por.); 8-1-001:008 and portions of 007 & 012; and 8-2-001:001, 022, 024, 025, and portions of 002.

Aloha e Chair Chang and Members of the Board,

As a branch of Ka 'Ahahui Hawai'i Aloha 'Āina, more commonly known as "Hui Aloha Aina", and specifically the Hilo branch, we strongly urge the Board of Land and Natural Resources to vote "NO" and to not accept the Army's Final Environmental Impact Statement (FEIS) for Kahuku, Kawaihoa, Poamoho, and Mākua and Kahanahāiki. We stand in support with our Honolulu branch in opposing the retention of any military lease on Hawai'i's soil, and we staunchly oppose the acceptance of this deceptive and erroneous environmental document.

As part of the Hawaiian Kingdom Government Lands that were administered by representatives of the people, these above-mentioned lands, waters, and familial legacies were held in trust for the benefit of the Hawaiian people. The Hawaiian Kingdom government consistently and relentlessly advocated for the protection of these same resources, wahi kūpuna, and wahi pana - we strongly urge you to bear this in mind always.

For too long, the Army has bombed, burned, and poisoned our lands with no consequence. The Army's poorly prepared FEIS in this agenda item presents the exact same issues as their submission for Pōhakuloa. For those reasons alone the acceptance of this misleading document should never see the light of day. The U.S. military is responsible for irreversible environmental damage, with track records such as Kaho'olawe, Pōhakuloa, Kapukākī, and this time Kahuku, Mākua, and Kawaihoa – it would be foolish to think that the Army or U.S. military would change its practice now, or in the future.

While we stand here today, facing the unwelcome and illegal occupation of Hawai'i by the United States, the greatest affront to Hawaiians that can be committed is the continued desecration and displacement by the U.S. military. The ramifications of allowing such behavior in such sensitive spaces with 'iwi and cultural sites reach far beyond Hawai'i's shores. Allowing the U.S. military free access to Hawai'i's soil, without consequence, could only serve to reflect this board's compliance in spreading U.S. imperialism and hegemony across the world – as that

is the only product and use the military sees for this space. This is the same type of hegemony that saw to it our own illegal occupation, starting in 1893.

Beyond an environmental review or rubber stamp, this is a pacifier being handed to us by an agency that could care less about our safety or our laws. This agreement is only designed to continue the occupation and degradation of Hawaiian lands, waters, and families. Accepting this FEIS would not just be irresponsible—it would be complicity in continued harm here and anyplace else in the world that the U.S. military kills and occupies. We cannot consent to this.

Stand with the families, communities, residents, and those who will be most affected by your decisions on this matter – as we do. Do right by the land and its people, and care for these lands the way that they were meant to be cared for. The opportunity to do so is now.

Do not accept this Final EIS.

“E ho‘omau i ke kūpa‘a no ke aloha i ka ‘āina.”

Hui Aloha ‘Āina o Hilo

**From:** [Sharde Freitas](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony Agenda Item D-1  
**Date:** Thursday, June 26, 2025 10:07:18 AM

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Dear Chair Chang and Members of the Board,

I urge you to REJECT the Army's Final Environmental Impact Statement (FEIS) for the retention of lands on O'ahu.

I am particularly concerned about the lack of any meaningful plan, or commitment, to remediate 'āina the Army has contaminated from decades of live fire training and other activities. **The lack of any such plan forecloses the BLNR's and public's ability to fully understand and ultimately realize the beneficial impacts of the Army's relinquishment of its currently leased lands** - including to our 'āina, Native Hawaiian traditional and customary practices, food security, public health, housing, and economic development. As a result, this FEIS cannot be accepted as complete.

**The need for a remediation plan is also informed by the Department of Defense's long, long history of failed commitments to safeguard and remediate O'ahu's 'āina from toxic contamination.** From the Navy's poisoning of 93,000 residents and our sole source aquifer after multiple [Red Hill fuel spills](#); to the Navy and Army Corps' decade-long failure to remediate the toxic contamination discovered [under Radford High School](#); to the U.S. Marine's refusal to recognize the threat to families and keiki exposed to [toxic lead contamination](#) in the sand, fish, and homes surrounding its Pu'uloa firing range; to the Army's attempt to cover up its use of [depleted uranium at Schofield](#); untold generational harms have been and may continue to be inflicted on this island and its people, due to the Department of Defense's misplaced priorities when it comes to preventing and cleaning up its messes.

Accordingly, a concrete plan and commitment for remediation is essential not only to comply with our environmental review law, but to ensure that lands relinquished by the Army are actually restored in a timely manner.

Please REJECT the FEIS before you today. Mahalo for your consideration of this testimony.

Ke aloha 'āina,

Sharde Mersberg Freitas

**From:** [Ashley Galacgac](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 8:28:33 AM

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

My name is Ashley Ancheta Galacgac 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.**

I was born and raised on O'ahu. I am constantly reminded of the entitlement and violence of the United States military on these illegally occupied stolen lands of the Hawaiian Kingdom. Just the way place names have been replaced by forts and bases, military personnel and their dependents buying and renting homes have been pushing out kānakā and local families who have no choice, but to move away or go houseless. Many of the federal and state institutions entrusted to take care of the land and the people have deferred to and even defended American interests. Interests that promote dominance and exploitation wherever it goes. **Show the people of Hawai'i that the BLNR upholds your trust responsibilities, the mission of your department, and the laws that protect our 'āina and our future.**

The occupation of these lands and usage for training is America's agenda of endless warfare, death, and destruction. Hawai'i resident taxpayer money is funneled to be used in genocides that the U.S. government is funding alongside Israel. These troops are brought to Hawai'i where lands, waters, and cultural resources are sacrificed in the name of wars that so many people here in Hawai'i want to end. All the while, war profiteers who have no vested interest in Hawai'i are profiting.

The EIS does not accurately reflect the harm that the United States military has done on the lands and the long-term impacts that generations will continue to need to address, repair, and restore. The plants, animals, and cultural resources cannot be replaced. Similarly to the concerns I also shared about the lease renewal at Pōhakuloa, this EIS does not even address how the violence of the U.S. military permeates into the communities where women, girls, and māhu are not safe. As there is violence enacted on the land, military personnel contribute to the rise of domestic violence, intimate partner violence, and the sex trade in Hawai'i.

**The over 6,000 acres at Kahuku, Poamoho, and Mākua must be returned to the people of Hawai'i, especially the lineal descendants.** There are people who have been caring for those lands for generations and other community members who are ready to continue to live and thrive on those lands. There are pockets of cultural practitioners and community members who have dedicated their lives and work to reclaim practices and pass on knowledge to future generations. The army's lack of sufficient information to conduct a Ka Pa'akai analysis of impacts to constitutionally protected Native Hawaiian traditional and customary practices demonstrates its disregard of the adverse impacts on Native Hawaiians. When the land is returned, Hawai'i's land, waters, and people will be safe and cared for.

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

Sincerely,  
Ashley Ancheta Galacgac  
O'ahu

**From:** [Laila Gallardo](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [tm.hawaiipeaceandjustice@gmail.com](mailto:tm.hawaiipeaceandjustice@gmail.com)  
**Subject:** [EXTERNAL] Direct Opposition to Acceptance of the Army's O'ahu Leased Lands FEIS  
**Date:** Thursday, June 26, 2025 1:21:28 AM

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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,**

**Laila Marie Gallardo**  
**Youth Organizer at Hawai'i Peace & Justice**

[laila.m.gallardo@gmail.com](mailto:laila.m.gallardo@gmail.com)



**From:** [page.gathings](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agendaitem D-1  
**Date:** Thursday, June 26, 2025 8:42:14 AM

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

*My name is Page Gathings 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,  
Page Gathings*

**From:** [Jadie Iijima](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 7:39:21 AM

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

*My name is Jadie 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. I stand in support of the points made in the DLNR Staff Submittal on Item D-1, and agree with the Staff recommendation of non-acceptance.*

*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,*

*Jadie Hōkūala Iijima Geil*

**From:** [Katherine Gladwin](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Please reject the army's EIS  
**Date:** Thursday, June 26, 2025 9:27:12 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at 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.

Sincerely,

Katherine Gladwin

**Susan Gorman-Chang**

**Testimony regarding FEIR for Oahu military leases with state of Hawaii**

**June 26, 2025**

Mahalo for taking my testimony. I appreciate the hard work DLNR performs and the difficult decisions it must make for the residents of Oahu.

Under Hawaii law, "Environmental impact statement" or "statement" means an informational document prepared in compliance with the rules adopted under section 343-6 and which discloses the environmental effects of a proposed action, effects of a proposed action on the economic welfare, social welfare, and cultural practices of the community and State, effects of the economic activities arising out of the proposed action, measures proposed to minimize adverse effects, and alternatives to the action and their environmental effects."

The Army's FEIS does not meet the standards listed under Hawaii law.

**..and alternatives to the action and their environmental effects**

This FEIR is deficient in their discussion of *Alternative 9: No Retention and move all MMR training elsewhere*. This is because their Alternatives # 1, 2 & 3 as shown in their screening criteria in Section 2.31 and Table 2-6 incorrectly, prematurely, and presumptuously assume that any new lease with the state of Hawaii on Oahu will be at least 25 years in length! The length of any lease, if given by the state of Hawaii, has not been determined and it is therefore not appropriate to use a 25 year lease as a factor in the Army's screening criteria. If discussion has occurred prior to this FEIR regarding potential lease lengths then that in and of itself is a violation of state law.

Since the underlying assumption of screening criteria #1 "Allow for long term use (at least 25 years)" and the term "long-term" as used in criteria #2 and #3 that a lease on Oahu would be 25 years and that no other location in the world would allow for a 25 year long-term lease, then the conclusions reached that the locations on Oahu are the ONLY ones that meet their criteria are also incorrect. The Army's conclusion is a fallacy, because it relies on a faulty assumption.

**HAR 11-200 1-24(g)(6)**

requires that the EIS must include "summary technical data, diagrams, and other information necessary to enable an evaluation of the potential environmental impact by commenting agencies and the public." **40 CFR §1502.14(b)** requires that the EIR "discuss each alternatives in detail ...so that reviewers may evaluate their comparative merits." This FEIR has failed in this aspect because it does not describe what benefits *Alternative 9: No Retention and move all MMR training elsewhere* would provide to kanaka maoli and to all residents of Oahu. For example, instead of being land that is restricted as it is under a lease,

those Native Hawaiians who wish to perform cultural practices on that land would be free to do so without military escort or military dictated specific hours or times. In addition, under alternative 9, cultural areas, artifacts, burial sites, walls and other structures would be preserved and recognized for their cultural significance. Furthermore, if Alternative 9 was used, then the lands could act as carbon sinks, trees and forests could again be an integral part of the watershed, free of toxins and UXO, all of which serve to heal the environment and help combat climate change. Climate change caused by human use of fossil fuels is a scientific fact that cannot be scientifically challenged by the denialist opinion of the current administration in Washington D.C. Furthermore, Alternative 9 would result in no green house gases (GHG) that would otherwise be produced by the Army during its maneuvers and training as well as the GHG released when this land is used during “joint and multiple training exercises” and RIMPAC.

In addition, many sections refer to “Fair Market Value” (FMV) of the lands and/or of any new leases without delving into how any FMV would be computed. Lacking the information about how FMV would be calculated is another fatal deficit in this FEIR, which should prevent it from being accepted by the DLNR.

#### **HAR 11-200.1-24(i).**

**“the draft EIS shall include a description of the environmental setting...Special emphasis shall be placed on environmental resources that are rare or unique to the region and the action site (including natural or human made resources of historic, cultural, archaeological or aesthetic significant)”**

Army fails to provide up to date and current studies on flora and fauna in the subject areas. Being an island, our species are quite specialized to this environment and particularly vulnerable to encroachments into such environment. Hawaii is the “extinction capital” of the world when it comes to bird species. The phrase used by the Army in their FEIR is that for several listed species “there have been no documented occurrences”. This is a carefully worded statement, rendered meaningless when one asks (1) What if any effort whatsoever were performed to actually look for these species? (2) Were these species seen but not documented, and thus no “documented occurrences”? This does not in any way substitute for a full study, which should be done in order for a FEIR to be complete and acceptable.

Furthermore the FEIR lacks complete studies of archeological and cultural sites, and it seems that entire areas were not even looked at let alone an Archeological Inventory Survey being conducted.

In conclusion, I concur with the Department of Land and Natural Resource’s (DLNR) staff comments regarding the insufficient nature of this Final Environmental Impact Statement (FEIS). The refusal on the Army’s part to conduct robust and current biological studies and its lack of a clear and current baseline of data on native and endangered species speaks to a deeper issue of the Army being an organization steeped in the philosophy that ‘aina and

'wai are products to be used and abused with an attitude of exploitation and extraction so typical of a colonialist mindset which devalues and dehumanizes anything other than its own culture and its own "mission."

**From:** [tylermgourley@gmail.com](mailto:tylermgourley@gmail.com)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 10:12:22 AM

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Aloha, My name is Tyler Gourley and I have been a member of the dirtbike community for little over 10 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Sent from my iPhone

**From:** [William Greenleaf](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda item D-1"  
**Date:** Thursday, June 26, 2025 10:15:35 AM

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**Aloha DLNR**

**Please reject the Army's flawed and thus inadequate FEIS**

**For the sake of all the people, please take a stand for following the law. No passes for any reason.**

**Mahalo  
Bill Greenleaf  
Greenleaf Farm**



**From:** [Hong Gwi-Seok /Peggy](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony Agenda Item D-1: REJECT FEIS  
**Date:** Thursday, June 26, 2025 4:38:17 AM

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Dear Chair Chang and members of BLNR,  
I urge you to reject the FEIS before you today!

I grew up in Hawai'i but moved away with my family as a teenager in the 1970s, and returned 4 years ago to be closer to family. Most recently, I had been living in Detroit, Michigan, for 9 years.

Do you remember the Flint water crisis? Under so-called Emergency Management, water from the Flint River, filled with toxic waste, was piped into households, with tragic health results. Flint is only 1 hour away from Detroit, and although my water did not get contaminated, I witnessed the destruction and devastation of Flint's water supply firsthand. It was absolutely horrific, and it's not over. 13 years later, they are STILL trying to remediate the problems from the poisoned water. A generation of children with lead poisoning is only one of the myriad catastrophic effects.

Imagine my shock and horror to learn about the Red Hill water disaster just about the time I was planning my move back to O'ahu to be closer to my grandchildren. The stories and health effects being reported were all too familiar. The same scenarios will play out all over the world if we do not address the urgent environmental issues now. Water is indeed the new oil. In Michigan, the native Anishinaabe people call out, Mni wiconi! This carries the exact same meaning as Ola i ka wai! Water is life! Nothing is more urgent. From Hawai'i to Flint, MI, to Palestine, protection of wai must be our highest priority.

Furthermore, the DOD's history of environmental destruction in Hawai'i nei must end. We cannot tolerate any more contamination of our soil, our waters, and all the living beings inhabiting our `āina. Enough is enough.

Mahalo for your kind attention.  
Peggy Hong  
Waimānalo, HI

홍귀석  
hong gwi-seok (Peggy Kwi-Suk Hong)  
[stillinsirsasana.blogspot.com](http://stillinsirsasana.blogspot.com)  
[yoganun.weebly.com](http://yoganun.weebly.com)  
[iysdc.org](http://iysdc.org)  
[iyengaryogadetroit.com](http://iyengaryogadetroit.com)  
313-454-1401

“A revolution that is based on the people exercising their creativity in the midst of devastation is one of the great historical contributions of humankind.”  
— Grace Lee Boggs

**From:** [J. Noelle Hall](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject Army's FEIS  
**Date:** Thursday, June 26, 2025 8:08:45 AM

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Greetings BLNR,

I'm asking you folks **reject** the Army's final environmental impact statement (FEIS) due to it being insufficient on several grounds:

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

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

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

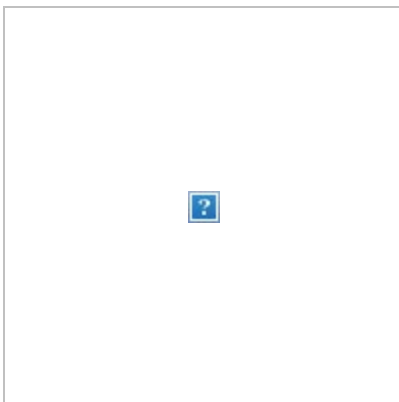
**J. Noelle Hall MA, LMHCA**

(She, hers)

206-687-4747

<https://momi.health/>

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



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**From:** [Pat Handlin](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] U.S. Army FEIS hearing before the Hawai'i Board of Land and Natural Resources  
**Date:** Thursday, June 26, 2025 10:47:42 AM

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To: Hawai'i Board of Land and Natural Resources  
From: Patricia Handlin, Attorney

I urge you as members of the Hawai'i Board of Land and Natural Resources (BLNR) to reject the U.S. Army's Final Environmental Impact Statement (FEIS) and to protect sacred lands from further military destruction by the U.S. Army which seeks to retain: Kahuku Training Area (1,170 acres), Kawaihoa-Poamoho (4,370 acres), and Mākua Military Reservation (782 acres).. Before being granted a new lease, they need Hawai'i's Board of Land & Natural Resources (BLNR) to accept their Final Environmental Impact Statement (FEIS). Their current lease which began in 1964, was originally granted for just \$1, and expires in 2029. I urge you to reject the Army's FEIS because:

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.
5. These lands should be restored and returned to Native Hawaiian peoples.
6. The lease would allow the U.S. Army to use these sacred lands for more military training and live fire exercises.

Thank you,  
Pat Handlin

Patricia Handlin, Attorney  
1180 N. Milwaukee Avenue  
third floor  
Chicago, IL 60642  
phone (773) 255-4331  
[handlinlaw@aol.com](mailto:handlinlaw@aol.com)

Patricia Handlin, Attorney  
1180 N. Milwaukee Avenue  
third floor  
Chicago, IL 60642  
phone (773) 255-4331  
[handlinlaw@aol.com](mailto:handlinlaw@aol.com)

**From:** [Gertrude Hara](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] MY TESTIMONY  
**Date:** Thursday, June 26, 2025 6:57:45 AM

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I'm very concerned regarding this upcoming in Hawaii the U.S. military will be present in Israel and Iran situations.

I disagree with this and against it totally.

Why, having our military forces be accountable for these situations.

We must not ever have our men and women participate at this crucial time.

We need them in case we are in deep trouble and it involves them to take care of us people. In case we are involved in these situations.

This is my testimonial and pray for peace.

Gertrude Hara-Williams

Hendersen, Nevada

Formerly from Honolulu, HI

## **Agenda Item D-1 – Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation**

Aloha Chairperson and Members of the Board,

I am Hanaloa Helelā, ‘Ōiwi Hawai‘i and president of Wai Ola Alliance, board member of Hawai‘i Peace and Justice, member of Nā Alaka‘i o Ka‘ohewai, and member of Hui Aloha ‘Āina. I am writing to implore you to reject the Army’s Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaihoa–Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai‘i law and your duty to protect public trust lands.

### **Environmental and Health Hazards**

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. At Mākua, promised Phase 2 testing hasn’t been done, and no sampling occurred at Kawaihoa–Poamoho. Risks to health, ‘āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There’s no wildfire plan or climate adaptation strategy—issues even the EPA flagged. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

### **Disregard for Culture, Ecosystems, and Accountability**

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and offers no clear protocols for cultural access. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup.

### **Failure to Consider Alternatives**

The Army failed to evaluate meaningful non-military or reduced-use alternatives, despite repeated calls from the public, Native Hawaiian communities, and agency reviewers. Instead, the FEIS focuses solely on maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship.

This FEIS is not a genuine assessment—it’s a justification for continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. I urge you to vote no and reject this FEIS for its failure to address contamination, cultural and ecological harm, and for violating the public trust.

Mahalo for your time and for upholding your kuleana to protect our ‘āina.

Aloha 'Āina me ka oia'i'o,

Hanaloa Helelā

President Wai Ola Alliance

Board Member Hawai'i Peace and Justice

Nā Alaka'i o Ka'ohewai

Hui Aloha 'Āina

**From:** [Cheryl Hendrickson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject Army FEIS  
**Date:** Thursday, June 26, 2025 7:05:21 AM

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Aloha Chair and Board Members-

I urge you to reject this final EIS because of inadequate environmental and cultural impact analysis. These places are not disposable. They are sacred and beloved places.

There is insufficient disclosure of the military activities on these lands. Decades of misuse have proven the Army is not capable of taking care of these lands.

They lack accountability for past environmental and cultural damages. They lack plans for future remediation efforts. These places contain endangered species habitats.

The Army's restrictive cultural access policies hinder Kanaka Maoli cultural practices and access to numerous historical and sacred sites.

It conflicts with BLNR's constitutional duty to malama aina.

Many mahalos,  
Cheryl Hendrickson  
40 year kama'aina



**From:** [Ho, Brandon](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 10:09:17 AM

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Aloha, My name is Brandon Ho and I have been a member of the dirtbike community for two years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Sent from my iPhone

**From:** [pomai hoapili](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] US army eis  
**Date:** Thursday, June 26, 2025 8:50:46 AM

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I'm writing this letter of testimony. That I am against the military's continued use and destruction of our land here in Hawaii from Kahuku to Pohakuloa. I urge the powers that are in place reject the military's EIS for use of our treasured land. The disaster at red hill is the breaking point for all of us. The military poisons its own soldiers and workers. They surely have no problem poisoning the general public.

Pomai Hoapili

**From:** [Frank Hobus](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony Supporting DLNR recommendation  
**Date:** Thursday, June 26, 2025 7:24:23 AM

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Aloha,

I support the points made by DLNR staff on item D1 and their recommendation to reject the FEIS.

The noncompliance, disrespect, and deception can no longer be tolerated, and our invaluable finite natural resources shouldn't be squandered for the sake of the US military industrial complex.

Mahalo,  
Frank Hobus

Dawn N.S. Chang, Chairperson  
Board of Land and Natural Resources (BLNR)

## Final Environmental Impact Statement (FEIS) Decision

Friday, June 27th, 2025 at 9am, 1151 Punchbowl St. Room 132 (Kalanimoku Building), Honolulu

### Rejection of the Army's FEIS

My name is Reyna Hunkin and I am a resident of Kapolei, O'ahu. I am an alumnus of Kapolei High School and am currently continuing my education at the University of Southern California. I am testifying for the rejection of the Final Environmental Impact Statement for the Army Training Land Retention at the Kahuku Training Area, the Kawaihoa-Poamoho Training Area, and the Mākua Military Reservation.

For as long as I have been alive, I have enjoyed taking advantage of all the wonders of nature here. Through the public education system, I grew up learning about the sacredness of the 'āina here, as well as the importance of keeping it intact. I am not Kānaka Maoli, but you don't need to be of the land to know that it **shouldn't continue to be occupied**, let alone by a military who cannot satisfy the requirements of using said land.

I support the points made in the Department of Land and Natural Resources (DLNR) Staff Submittal on Item D1 and the Staff recommendation to **reject the FEIS**. The FEIS is insufficient on many grounds, including but not limited to, the blatant lack of respect and accountability for the past environmental and cultural desecration of the land, the absence of future remediation efforts, the sparse disclosure of military activities, an "inadequate Environmental and Cultural Impact Analysis" (Lāhui Foundation) and lack of data on the impacts of their occupation of the land. The Army clearly has no intention of taking care of the land, as proved by their declaration that the cleanup of their own mess is "outside the scope" of its EIS. Nobody should forget that the occupation of Hawai'i is illegal, and for it to continue to be stolen time and time again, without remorse, is immoral. To take land, only to violate it and dishonor the culture it is a part of is beyond cruel.

By rejecting the Army's FEIS, the board would be upholding its constitutional duty to mālama 'āina, as well as take care of the needs of the people. This rejection is also crucial in ensuring that the Army does not further degrade Hawai'i lands through the renewal or creation of new leases. Thank you for this opportunity to testify.

Reyna Hunkin  
(808)777-8170, hunkin.reyna@gmail.com

**From:** [Angela Huntmer](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Oahu Military Training Leases Expiring Friday June 27  
**Date:** Thursday, June 26, 2025 10:26:51 AM

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Aloha Chair Chang and Board Members,

In addition to vacating ALL of the land currently leased to the US Military for training, the US Military should provide cleanup and restoration of all leased lands with expiring leases.

We all recognize that when anything is rented, leased or when transfer of ownership or tenantry is imminent, items or premises are cleaned to restore them to a condition comparable to when they were acquired minus general wear and tear.

The FEIS neglects to provide any substantive information regarding the cleanup and decontamination of the physical destruction, poisoning and introduction of invasive species on lands leased.

Renewal of their leases should not move forward for many reasons outlined and reiterated again and again in testimony you have been receiving from the public.

Either way, whatever deal is finally struck, must include cleanup, decontamination, and, as your mission at DLNR requires, protection of our land with its unique suite of animal and plant species that call this place home.

Thank you for your time and attention.

Angela Huntmer

**From:** [Lana Hunter](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Army EIS  
**Date:** Thursday, June 26, 2025 2:28:36 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **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
- 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

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,

**From:** [Chase](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony  
**Date:** Thursday, June 26, 2025 5:19:49 AM

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Aloha,

My name is Chase. I am speaking on behalf of all Native peoples, not just Native Hawaiians. All that came before, all that are here now, and all that are to come.

To have the United States Army illegally occupy land, and then rent land out for measly dollars per year, is not only against integrity but against humanity. Morals. Lessons taught to us for generations, gathered by ancestors who have toiled just to find the most efficient, effective, and SUSTAINABLE ways to live in harmony with the land. Once you're out of harmony, the fresh waters stop flowing, the trees stop fruiting, the soul becomes rotten.

The Army's effect on Hawai'i has gone on for too long, and they have only brought destruction. So many streams have dried up. So many native flora and fauna gone within years, while it took millennia for them to evolve. So many cultural historical places and practices lost. They claim to have the "military defenses to protect us", but we would not need protecting if it was not for their ILLEGAL OCCUPATION in the first place.

They do not deserve a place here. They do not deserve to bomb innocent land, animals, plants, or anyone for that matter. They do not deserve to continue their mindless and greedy warfare practices on sacred islands. They do not deserve to have access to our wahi pana, our sacred places. Once you destroy the land, you destroy the people.

Kūla'ila'i, the reef at Mākua beach, is where La'ila'i rose after she descended from the heavens. She is the first woman, the mother of every Hawaiian, hence the name Mākua (Parent). Once a beautiful, bountiful valley filled with songs of gratitude and grace, is now lonely and destitute with only foreign militants as its population. The US military had their war ships out in the water on Mākua bay, shooting 250lbs, 500lbs, and 1,000lbs bombs over the beachgoers and indigenous families who lived there still (nearer the shore). They say you could feel the shockwaves all the way in Lualualei Valley. I work in Lualualei Valley, on MA'O Organic Farms. I hear the bombs from Schofield- just over the mountain of Pūhāwai. I feel the quakes and the cries of the land. I feel the intent of the US Army, and we should have to debate over the fact that they are not welcome here.

Mahalo for listening,

Chase

**From:** [cheante igawa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 10:01:26 AM

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Aloha, My name is Chean'te Igawa and I have been a member of the dirtbike community for 20+ years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

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



**Submitted by:** Jace Inagaki  
**HEARING DATE:** June 27, 2025  
**HEARING TIME:** 9:00 a.m.  
**PLACE:** DLNR Boardroom, Kalanimoku Bldg. 1151 Punchbowl Street, 1st Floor

**SUBJECT: Opposition to the U.S. Army Final Environmental Impact Statement (EIS) for the Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation**

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

My name is Jace Inagaki, and I am 15 years old. I am kānaka Maoli of Waimānalo, O‘ahu, and I am writing this testimony because I care deeply about the future of our ‘āina (land), our culture, and our people. I am strongly opposed to the U.S. Army’s Final Environmental Impact Statement (FEIS) for the retention of lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation.

As a kānaka Maoli, I have been taught to honor and protect the land because it is not just something we live on it is a part of who we are. The ‘āina gives us life, it connects us to our ancestors, and it is our kuleana (responsibility) to care for it so that it can continue to provide for future generations. This proposal by the U.S. Army to retain these lands does the exact opposite. It threatens the land, our culture, and the future that I and other young people will inherit.

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## **1. The ‘Āina is Being Destroyed**

These lands are sacred. They are home to endangered species that exist nowhere else in the world. The Hawaiian hoary bat (*‘ōpe‘ape‘a*), native tree snails, and our native birds deserve to have a safe environment where they can thrive. But the Army’s activities—like bombing, live-fire training, and heavy equipment use—are destroying their habitats. Once these species are gone, we can’t bring them back.

The FEIS admits that military training has caused damage to the environment, but the solutions it offers are weak and don’t actually fix the harm that’s already been done. If the Army keeps using these lands, more destruction will happen, and the ‘āina will be left in

worse shape than it already is. What kind of future does that leave for me and the generations that come after me?

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## **2. Our Culture is Being Disrespected**

The Mākua Military Reservation is one of the most sacred places on O‘ahu. It holds burial sites, heiau (temples), and other cultural treasures that connect us to our ancestors. The Army claims they will protect these sites, but history shows us they haven’t kept their promises. Over the years, they’ve damaged sacred sites and ignored the voices of Native Hawaiian cultural practitioners.

When our cultural sites are destroyed, it’s like a part of our identity is being taken away. The Army has no right to desecrate places that hold so much meaning to us. If the FEIS doesn’t guarantee real protections for these sites—and it doesn’t—then it fails to respect our culture and the Hawaiian way of life.

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## **3. The Future of Our Water is at Risk**

The Army’s activities also threaten the water that we rely on. Contamination from unexploded bombs, chemicals, and heavy metals could leach into our groundwater. We’ve already seen what happened with Red Hill, where the Navy’s fuel tanks poisoned the water that thousands of families depended on. We can’t let something like that happen again.

The FEIS doesn’t provide a solid plan to clean up the contamination that’s already there or to prevent more pollution in the future. As someone who will grow up depending on O‘ahu’s freshwater, I’m scared about what will happen if we don’t protect our water resources now.

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## **4. The Army’s Promises Don’t Mean Anything**

For decades, the Army has promised that they would clean up the lands they’ve used for training. But over and over again, they’ve broken those promises. They’ve left unexploded bombs, toxic chemicals, and permanent scars on the land. Why should we believe in them now when they say they’ll take care of the ‘āina?

Instead of letting them continue to use these lands, we should return them to the state or the community. We could restore the forests, protect endangered species, and care for the cultural sites the way our ancestors would have wanted. The lands could become a space for education, conservation, and healing instead of destruction.

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## **5. This Decision Will Shape the Future**

As someone who will live with the consequences of this decision, I am asking you to think about what kind of future you want to leave for me and my generation. Do you want to leave us lands that are polluted, barren, and unsafe? Or do you want to leave us lands that are healthy, thriving, and full of life?

The Army doesn't need more land. They already have such a huge presence in Hawai'i—Schofield Barracks, Wheeler Army Airfield, Pohakuloa Training Area, and more. Enough is enough. These lands are too important to be used for more bombs and destruction.

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## **Conclusion**

The U.S. Army's FEIS is full of holes. It doesn't meet the requirements of Hawai'i's environmental laws, it ignores the voices of the public, and it fails to provide real solutions to the damage that's already been done. Approving this FEIS would be a betrayal of the 'āina, of our culture, and of the future generations who will have to live with the consequences.

As a kānaka Maoli of Waimānalo, O'ahu, I am asking you to reject this FEIS and to stand up for the 'āina. Please protect these lands for us your keiki (children) and for the generations who will come after us.

Mahalo nui loa for listening to my voice and for considering my testimony.

**Respectfully submitted,**

Jace Inagaki

15 years old, Student, and Kānaka Maoli of Waimānalo, O'ahu

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## Cited Resources

### 1. U.S. Army Final Environmental Impact Statement (FEIS)

- U.S. Army. (2025). *Final Environmental Impact Statement: Army Training Land Retention at Kahuku, Kawaihoa-Poamoho, and Mākua Military Reservation*. Retrieved from [https://files.hawaii.gov/dbedt/erp/Doc\\_Library/](https://files.hawaii.gov/dbedt/erp/Doc_Library/).

### 2. Hawai'i Revised Statutes (HRS) Chapter 343

- Hawai'i State Legislature. (n.d.). *Hawai'i Revised Statutes Chapter 343: Environmental Impact Statements*. Retrieved from <https://www.capitol.hawaii.gov/>.

### 3. Red Hill Contamination

- Hawai'i Department of Health. (2022). *Red Hill Drinking Water Contamination Report*. Retrieved from <https://health.hawaii.gov/>.

### 4. Endangered Species and Habitat Protections

- U.S. Fish and Wildlife Service. (n.d.). *Critical Habitat Designations in Hawai'i*. Retrieved from <https://www.fws.gov/>.

**Submitted by:** Ronnie N. Inagaki  
**HEARING DATE:** June 27, 2025  
**HEARING TIME:** 9:00 a.m.  
**PLACE:** DLNR Boardroom, Kalanimoku Bldg. 1151 Punchbowl Street, 1st Floor

**SUBJECT:** Opposition to the U.S. Army Final Environmental Impact Statement (EIS) for the Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation

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Aloha Pumehana, Chair Chang and Members of the Board,

Thank you for the opportunity to submit testimony regarding Agenda Item D-1, which pertains to the U.S. Army's Final Environmental Impact Statement (FEIS) for the retention of state lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation on O'ahu. As a Kanaka Maoli resident of O'ahu, I am submitting this testimony in strong opposition to reject the approval of the FEIS and the proposed retention of these lands for military training purposes.

After a thorough review of all four volumes of the FEIS, it is evident that the document fails to comply with applicable laws, does not adequately disclose the impacts of the proposed action, and raises significant environmental, cultural, and legal concerns. Below, I outline the deficiencies in the FEIS and provide evidence to support the rejection of Agenda Item D-1.

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## **1. Non-Compliance with Hawai'i Environmental Review Laws**

The FEIS does not meet the requirements of Hawai'i Revised Statutes (HRS) Chapter 343, which mandates "identification and disclosure of cumulative and secondary impacts, and alternatives to the proposed action" (HRS §343-5). The FEIS omits a thorough analysis of alternatives such as returning the lands to state or community control for conservation or cultural stewardship and fails to fully disclose cumulative impacts on groundwater and cultural resources (FEIS Vol. 1, Section 2.3). This lack of transparency violates the intent of

HRS Chapter 343, which requires full disclosure of environmental impacts to allow for informed decision-making.

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## **2. Failure to Address Valid Concerns Raised During the Drafting Process**

During the public comment period for the Draft EIS, numerous concerns were raised by Native Hawaiian organizations, environmental groups, and local residents. The FEIS received over 1,200 public comments, the majority of which expressed strong opposition to continued military use and called for the restoration of these lands to state or community control (FEIS Vol. 4, Public Comments and Responses). Many comments specifically cited concerns about cultural desecration, environmental contamination, and lack of meaningful consultation with Native Hawaiian communities. However, the FEIS fails to adequately address these concerns, particularly regarding enforceable protections for sacred sites and comprehensive plans for remediation of hazardous waste.

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## **3. Inadequate Disclosure of Environmental Impacts**

The FEIS fails to provide a comprehensive analysis of cumulative impacts on endangered species. For example, while the presence of the Hawaiian hoary bat ('ōpe'ape'a) is acknowledged, the FEIS does not analyze the effects of repeated live-fire exercises on its habitat or long-term survival (FEIS Vol. 2, Table 3-4). Similarly, the discussion of O'ahu tree snails lacks detail on mitigation measures for habitat disturbance (FEIS Vol. 2, Section 3.5). The impacts of soil erosion, sedimentation, and contamination on O'ahu's critical watersheds are not adequately analyzed, nor does the FEIS address how the proposed action aligns with Hawai'i's climate goals, including carbon neutrality by 2045.

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## **4. Lack of a Comprehensive Mitigation Plan**

The mitigation measures outlined in the FEIS are vague and unenforceable. For instance, the FEIS proposes to “monitor cultural sites annually” (FEIS Vol. 3, Section 5.2), but does not specify who will conduct the monitoring, what standards will be used, or what actions will be taken if damage is found. Similarly, the plan to “implement best management

practices to reduce erosion” lacks detail on enforcement or accountability mechanisms, rendering these measures ineffective.

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## **5. Environmental Justice Concerns**

The FEIS fails to adequately address the disproportionate impacts of the proposed action on Native Hawaiian communities. The retention of these lands for military use perpetuates the desecration of sacred sites and the marginalization of Native Hawaiian cultural practices. The presence of unexploded ordnance (UXO) and hazardous waste poses significant health and safety risks to nearby communities, many of which are Native Hawaiian (FEIS Vol. 2, Section 4.7).

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## **Conclusion and Recommendation**

The U.S. Army’s Final EIS for the retention of state lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation is fundamentally flawed. It fails to comply with applicable laws, does not adequately disclose the impacts of the proposed action, and raises significant environmental, cultural, and legal concerns. The Board of Land and Natural Resources has a legal and ethical obligation under HRS Chapter 343 and Hawai‘i’s 2045 Sustainability Plan to protect the state’s environmental and cultural resources. Approving the FEIS in its current form would contravene these mandates and perpetuate harm to Native Hawaiian communities and O‘ahu’s natural heritage.

For these reasons, I respectfully urge the Board of Land and Natural Resources to reject Agenda Item D-1 and oppose the retention of these lands for military use. Instead, I encourage the Board to advocate for the return of these lands to state or community control, where they can be restored and preserved for future generations.

Mahalo for considering my testimony.

Respectfully submitted,  
Ronnie N. Inagaki

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**From:** [Emi Jenkins](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D-1 – Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and M...  
**Date:** Thursday, June 26, 2025 7:52:02 AM

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Aloha Chairperson and Members of the Board,

My name is Emi Jenkins and I am a member of Hui Aloha 'Āina o Honolulu and the Democratic Socialists of O'ahu. I am writing to urge you to reject the Army's Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaihoa–Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai'i law and your duty to protect public trust lands.

### **Environmental and Health Hazards**

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. At Mākua, promised Phase 2 testing hasn't been done, and no sampling occurred at Kawaihoa–Poamoho. Risks to health, 'āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There's no wildfire plan or climate adaptation strategy—issues even the EPA flagged. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

### **Disregard for Culture, Ecosystems, and Accountability**

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and offers no clear protocols for cultural access. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup.

### **Failure to Consider Alternatives**

The Army failed to evaluate meaningful non-military or reduced-use alternatives, despite repeated calls from the public, Native Hawaiian communities, and agency reviewers. Instead, the FEIS focuses solely on maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship.

This FEIS is not a genuine assessment—it's a justification for continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. I urge you to



vote no and reject this FEIS for its failure to address contamination, cultural and ecological harm, and for violating the public trust.

Mahalo for your time and for upholding your kuleana to protect our 'āina.

Emi Jenkins

Hui Aloha 'Āina o Honolulu

Democratic Socialists of O'ahu

**From:** [Keahi Kaowili](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 9:54:35 AM

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Aloha, My name is Keahi and I have been a member of the dirtbike community for 6 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

**From:** [Kawena'ulaokalā Kapahua](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Oahu Military Leases FEIS Testimony  
**Date:** Thursday, June 26, 2025 8:44:52 AM

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Agenda Item D-1 – Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaioloa-Poamoho Training Area, and Mākua Military Reservation

Aloha Chairperson and Members of the Board,

My name is Kawena'ulaokalā Kapahua. I am writing to urge you to reject the Army's Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaioloa-Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai'i law and your duty to protect public trust lands.

#### Environmental and Health Hazards

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. At Mākua, promised Phase 2 testing hasn't been done, and no sampling occurred at Kawaioloa-Poamoho. Risks to health, 'āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There's no wildfire plan or climate adaptation strategy—issues even the EPA flagged. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

#### Disregard for Culture, Ecosystems, and Accountability

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and offers no clear protocols for cultural access. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup.

#### Failure to Consider Alternatives

The Army failed to evaluate meaningful non-military or reduced-use alternatives, despite repeated calls from the public, Native Hawaiian communities, and agency reviewers. Instead, the FEIS focuses solely on maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship.

This FEIS is not a genuine assessment—it's a justification for continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. I urge you to vote no and reject this FEIS for its failure to address contamination, cultural and ecological harm, and for violating the public trust.

Mahalo for your time and for upholding your kuleana to protect our 'āina.

Kawena'ulaokalā Kapahua

**From:** [Kalia Kapisi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands  
**Date:** Thursday, June 26, 2025 8:59:34 AM

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Aloha members of the Board of Land and Natural Resources,

My name is Kalia Kapisi, and I am a resident of Maui. 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,  
Kalia Kapisi  
Pukalani, Maui

**From:** [Miki Kapisi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] In Opposition  
**Date:** Thursday, June 26, 2025 8:37:31 AM

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Aloha -

I am a resident of Hawaii for 57 years! I respectfully urge the BLNR to reject the lease renewal and support the return of these lands to the nā kanaka 'oiwi! Please do NOT renew any military contracts. They have shown that they do not have Hawaii's land as top of their priority! We need stewards that care for our land as we cannot just "buy more"! Doing the right thing is not always easy but it will be worth it when future generations will thrive because YOUR board made the right decision to keep the land well!

Mahalo,  
Pamela Mikala Singlehurst-Kapisi

**From:** [Bradley Kassebeer](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL]  
**Date:** Thursday, June 26, 2025 12:27:31 AM

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Aloha my name is Bradley kassebeer . I have been teaching my 7 year old son to ride dirt bike for 1 year now. I am very happy that he enjoys riding because it is something I always wanted to do as a child but couldn't afford to. We look forward to going up to kahuku dirt tracks to ride every weekend that it's open. We gather there with family and friends every chance we get . Watching my son and nephews progression in riding brings me an unexplainable amount of joy. My son Titus does the mx races and I have recently gotten myself a dirt bike to ride with him . We are both learning together .We look forward to having many more awesome experiences and making memories at kahuku dirt tracks . Please save kahuku dirt tracks , limit the closures , allow us to have a place to experience the joys of dirt biking at kahuku tracks , to get our kids of the devices , out of the house , off the streets, and away from all the distractions of life .

**From:** [Kahealani Keahi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony - Reject the FEIS. Protect O"ahu  
**Date:** Thursday, June 26, 2025 5:53:20 AM

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Aloha BLNR,

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

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

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

Ke aloha aina,  
Kahealani Keahi  
President  
Hui Makaainana a Kalawahine



**From:** [Jackie Keefe](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Please Reject the Army's FEIS  
**Date:** Thursday, June 26, 2025 6:49:00 AM

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Aloha kakahiaka kakou,

My name is Jackie Keefe and I am a resident of Lahaina.

We know that the US military has been desecrating stolen land without even making an attempt to clean any of it up. Their EIS is entirely insufficient due to an inadequate environmental and cultural impact analysis, insufficient disclosure of military activities on the lands, a lack of accountability for past environmental and cultural damage, no plans for future remediation efforts, and restrictive cultural access policies.

BLNR has a constitutional duty to malama 'aina and approval of this FEIS conflicts with that kuleana. These places are wahi pana - sacred burial sites, endangered species habitats, and birth stands of generational families. The Army has proven over decades that they are incapable of being responsible stewards of these sacred and beloved places. Not only that, but their lack of cultural awareness does not even allow them to see that what they are doing is wrong! The military sees these *stolen lands* as wide-open spaces for training their troops and will never see the malcontent of their actions.

I respectfully ask that you wholeheartedly REJECT the Army's FEIS. You know that it is not sufficient and these lands must be returned, restored, and protected.  
Mahalo for your kokua.

Jackie Keefe



808-264-8286

[@JackieForHawaii](#)

**From:** [Tasman Kekai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT THE FEIS  
**Date:** Thursday, June 26, 2025 8:33:36 AM

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Aloha kākou,

My name is Tasman Kekai Mattox and I am a current resident of O'ahu. I grew up in the diaspora, but when I visited my grandparents on the Island of Hawai'i, I remember seeing plumes of smoke rising from Pōhakuloa. I am sure my brothers and sisters here on O'ahu have the same vivid memories.

The US army has gotten lazy. It takes our land for granted, and this Earth, which Hawaiians have always treasured, must never be taken for granted. The final EIS has a clear lack of data to support the US army's continued use of stolen Hawaiian land.

I ask that you please reject the FEIS for Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation. Moving forward, let us steward the land so that our keiki can see the beauty of Hawai'i for themselves.

Mahalo nui loa,  
Tasman Kekai

**From:** [Kara Kelai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1 – Oppose the Army's Final EIS  
**Date:** Thursday, June 26, 2025 8:00:38 AM

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

My name is Kara Kelai from Kalihi, O‘ahu. I strongly urge you to reject the U.S. Army’s Final Environmental Impact Statement (FEIS) for the retention of State lands on O‘ahu. As someone who cares deeply about the future of our ‘āina and our people, I am alarmed by the document’s gaps, oversights, and overall disregard for both environmental stewardship and cultural responsibility.

First, the FEIS leans on outdated biological surveys, offering no current baseline for native and endangered species. It provides no clear plans to mitigate harm and omits the stream surveys specifically requested by the Division of Aquatic Resources. Equally troubling, cultural assessments remain incomplete: well-documented mo‘olelo are missing, respected kūpuna and practitioners were not adequately consulted, and a proper Ka Pa‘akai analysis—essential under Hawai‘i law—cannot be completed.

Serious environmental risks are also brushed aside. The FEIS contains no meaningful data on potential contamination that could reach groundwater, which many communities depend on. Proposed land uses clash with conservation-district and forest-reserve rules, yet no path to compliance—or to responsible cleanup when the land is eventually returned—is offered.

These shortcomings are not new. They mirror the very issues that led this Board to reject the Pōhakuloa FEIS. By repeating the same failures, the Army shows a pattern of ignoring local expertise, community voices, and your department’s own findings.

Finally, it is impossible to overlook the broader legal context: Hawai‘i remains, as documented by scholars and acknowledged in international venues, an illegally occupied country. No treaty of annexation was ever ratified; the 1898 Joint Resolution extended only U.S. domestic law and confers no legitimate claim to these lands. In that light, the Army’s continued use of—or expansion upon—Hawaiian public trust lands lacks a sound legal foundation and further underscores why this FEIS cannot stand.

Accepting the FEIS would compromise the environmental protections that are meant to safeguard our ecosystems, watersheds, and cultural landscapes. These lands are not only ecologically sensitive—they are also part of a living legacy that predates the illegal occupation of Hawai‘i, a truth that remains unresolved to this day. The decisions you make now will have lasting consequences, not just for this generation, but for the many that will come after us. Rejecting it would uphold your kuleana to protect our natural resources, respect cultural integrity, and make decisions grounded in accountability, justice, and aloha for both the land and its people.

Mahalo for listening to our concerns and for doing what is pono.

Sincerely,  
Kara Kelai  
Kalihi, O‘ahu



**From:** [Tiana K Kennedy](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands  
**Date:** Thursday, June 26, 2025 8:26:11 AM

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My name is Tiana Keli'ikuli-Kennedy, and I am a resident of Moanalua, 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,  
Tiana Keli'ikuli-Kennedy  
Moanalua, O'ahu

**From:** [Nina Ki](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 7:55:47 AM

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

*My name is Nina Ki 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,  
Nina Ki*

**From:** [Jacob Kierzek](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 7:12:37 AM

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

My name is Jacob 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,  
Jacob



**From:** [Maile Lavea-Malloe](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1 - Reject the Army's FEIS  
**Date:** Thursday, June 26, 2025 9:30:53 AM

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

My name is Maile Lavea-Malloe 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,

**Maile Lavea-Malloe**

**From:** [Mar](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [demsocoahu@gmail.com](mailto:demsocoahu@gmail.com); [tm.hawaiipeaceandjustice@gmail.com](mailto:tm.hawaiipeaceandjustice@gmail.com)  
**Subject:** [EXTERNAL] Direct Opposition to Acceptance of the Army's O'ahu Leased Lands FEIS  
**Date:** Thursday, June 26, 2025 8:52:19 AM

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

My name is Mar Leatherman and I am a resident of Kahalu'u, O'ahu. 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. There is no Baseline Data:

DLNR staff, in the document published on June 27, 2025 on the DLNR website about the FEIS, stated that the contents of the FEIS do not fully declare the environmental implications of the proposed action and it does not discuss all reasonably foreseeable consequences.

Without it, neither the Board nor the public can understand the full impacts — putting ecosystems, species, sacred sites, and watersheds at risk.

2. The Cultural Review is Incomplete:

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 are 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. This is how natural disasters of human origin occur, groundwater is poisoned, animals are killed, and ancestors' remains are desecrated. Though the choice may seem worth it now, generations after will look on the destruction of land and wellness for US war as the greatest human failure, as this kind of contamination lasts for thousands of years, and prevents growing things, raising kids, playing in the water or soil, and a long healthy life without cancer and organ failure.

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. The continued occupation is the destruction of that land, and only by allowing community to return can we see justice and health for the community.

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. This choice will be remembered indefinitely and will impact the well-being and future of all Kanaka Maoli and future residents of Hawai'i, from keiki to kupuna. Their wellness is the wellness of the 'āina, the land. You, the BLNR, have a duty to LAND and PEOPLE, not military. I implore you, Chair Dawn Chang and Members of the Board, to oppose the acceptance of the army's O'ahu Leased Lands FEIS.

In Truth and Kuleana,

Mar Leatherman

Kahalu'u, O'ahu, Democratic Socialists of O'ahu

[marissa.e.leatherman@gmail.com](mailto:marissa.e.leatherman@gmail.com)

(925)216-6865



June 27, 2025

Hawai'i Department of Land and Natural Resources

Kalanimoku Bldg. 1151 Punchbowl Street

**Re: Agenda Item D(1) Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, Island of O‘ahu**

The ACLU of Hawai'i is writing with concerns about the potential retention of land in O‘ahu by the United States Army, given our mandate to protect constitutional rights owed to the land and the people under the Hawai'i Constitution. While the value of these lands to meaningful military goals is questionable, the harm that the military presence has imposed on these lands is undeniable.

In Mākua, for instance, there has been serious issues of environmental destruction due to fires caused by military activity. The courts have been clear that continued live fire training at Makua is unacceptable and destructive, and we ask that DLNR affirm this.<sup>1</sup> The army has also imposed serious cultural harms to Native Hawaiians. In 2014, the Army blocked access to culturally important sites in Makua, in violation of its 2001 settlement. After a 2018 settlement agreement, the Army was forced to allow expanded access to these sites and to fulfill its obligation to remove unexploded ordnance from the valley.<sup>2</sup> Residents, however, remain unhappy with the destruction of Makua that has occurred under the military's watch: "All the graves have bullet holes in them. The grave markers have bullet holes in them. The cultural sites in the back (of Makua Valley) have bullet holes in them."<sup>3</sup> Although the army acknowledges some of the harm it

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<sup>1</sup> *Judge Halts Live-Fire Training at Makua*, Earthjustice (Mar. 19, 2004), <https://earthjustice.org/press/2004/judge-halts-live-fire-training-at-makua>; *Malama Makua v. Rumsfeld*, 163 F. Supp. 2d 1202 (D. Haw. 2001); William Cole, *Army Ends Live-Fire Training at Makua*, Honolulu Star-Advertiser (Jan. 13, 2011), <https://www.staradvertiser.com/2011/01/13/hawaii-news/army-ends-live-fire-training-at-makua/>.

<sup>2</sup> *Army Agrees to Restore Access to Hawaiian Cultural Sites*, Army Times (Aug. 8, 2018), <https://www.armytimes.com/news/your-army/2018/08/08/army-agrees-to-restore-access-to-hawaiian-cultural-sites/>.

<sup>3</sup> Blaze Lovell, *Army Agrees To Restore Access To Makua Valley Cultural Sites*, Civil Beat (Aug. 2018), <https://www.civilbeat.org/2018/08/army-agrees-to-restore-access-to-makua-valley-cultural-sites/>.

has caused in its draft environmental impact statements and recognizes its restriction against live fire training, this is insufficient. The repeated history of the army destroying land that is protected by constitutional public trust principles and harming Native Hawaiian culture and practice (also protected by the State constitution) speaks volumes to the integrity of the army in dealing with lands in Hawai‘i.

The Army has not only mismanaged but actively destroyed the land. The DLNR cannot fulfill its responsibility to care for public lands while continuing to entrust that land to the U.S. military.

In *Kauai Springs*, the Hawai‘i Supreme Court makes clear that agencies must apply a presumption in favor of public use, access, enjoyment, and resource protection for public lands.<sup>4</sup> Allowing the Army to retain land at Kahuku, Kawaihoa-Poamoho, and Mākua would significantly limit public use, access, and enjoyment and threaten the natural environment. Further, *Ching v. Case* makes clear that state agencies have a duty to Aloha ‘Āina, a cultural, legal, and spiritual responsibility to steward and care for the land.<sup>5</sup> The court in *Ching* accordingly found a constitutional obligation to ensure that lands leased to the military are protected from damage and contamination, pursuant to the terms of these leases and the State’s public trust duty.

The historical record is clear. For over 60 years, the army has proven itself a reckless tenant, violating lease terms and destroying the land and its inhabitants. Given the extensive history of harm done by the U.S. military on Hawaiian lands, the Board of Land and Natural Resources risks exposing itself and any contract with the military to liability if it fails its duty to Aloha ‘Āina. Unless extensive changes to the use of the land and compliance monitoring by the state are made, continuing the army’s tenancy in the lands being considered by Board today is inconsistent with the DLNR’s legally imposed constitutional duties under the Hawai‘i Constitution.

### **Questions Regarding the Final EIS:**

1. To what extent is the lease of land to the United States Army consistent with the constitutional public trust responsibilities to conserve and protect Hawai‘i’s land?
2. Is there a benefit conferred specifically towards environmental resources by such a contract that would outweigh harms done to the land?

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<sup>4</sup> *Kaua‘i Springs, Inc. v. Plan. Comm’n*, 324 P.3d 951, 984–85 (Haw. 2014)

<sup>5</sup> D. Kapua‘ala Sproat and MJ Palau-McDonald, The Duty to Aloha ‘Āina: Indigenous Values as a Legal Foundation for Hawai‘i’s Public Trust, 56, Harv. C.R.-C.L. L. Rev., 525-576 (2022); Noelani Goodyear-Ka‘O‘pua, The Seeds We Planted: Portraits Of A Native Hawaiian Charter School 31–34 (2013);

3. Given the serious environmental harms that the U.S. Army has committed on Hawai'i land, what guarantees has the Board of Land and Natural Resources obtained that such harms will not continue and what plan does it have to ensure compliance?
4. *In re Water Use Permit Applications*, 94 Haw. 97, 132 (Haw. 2000) made clear that the state "must take the initiative in considering, protecting, and advancing public rights in the resource at every stage of the planning and decision-making process." What calculations were used or will be used to determine the value of the proposed lease of land, and how does this valuation advance public rights in the land resource? How will the resulting funds be used to advance the public interest?

We urge the Department of Land and Natural Resources to reject the EIS. This will fulfill the DLNR's trust obligations to steward and care for public lands, to avert disasters like devastating fires, and to protect the people and threatened and endangered species of Hawai'i. We are grateful that the Board listened to the voices of community and the requirements of the constitution in its decisions regarding Pōhakuloa. Instead of a lease, we ask that DLNR require the U.S. to clean up environmental hazards it has created.

Mahalo,

Carrie Ann Shirota, Policy Director  
(808) 380-7052  
[cshirota@acluhawaii.org](mailto:cshirota@acluhawaii.org)

Nathan Lee, Policy Fellow  
(808) 380-5422  
[nlee@acluhawaii.org](mailto:nlee@acluhawaii.org)

*The mission of the ACLU of Hawai'i is to protect the fundamental freedoms enshrined in the U.S. and State Constitutions. The ACLU of Hawai'i fulfills this through legislative, litigation, and public education programs statewide. The ACLU of Hawai'i is a non-partisan and private non-profit organization founded in 1965 that provides its services at no cost to the public and does not accept government funds.*

**From:** [John Letoto](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] FEIS Proposal: Kahuku, Kawaihoa-Poamoho, and Mākua  
**Date:** Thursday, June 26, 2025 7:29:38 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **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.

Sincerely,  
John Letoto  
Moku O Keawe

Mahalo for taking action!

PHONE (808) 594-1888

FAX (808) 594-1938



**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
560 N. NIMITZ HWY., SUITE 200  
HONOLULU, HAWAII 96817

June 27, 2025

**Via Electronic Mail & In-Person**

Board of Land and Natural Resources  
Kalanimoku Building  
[blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)

Re: Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, Island of O‘ahu, Tax Map Keys (TMKs) (1) 5-8-002:002; 5-9-006:026; 7-2001:006; 6-9-003:001 (por.); 8-1-001:008 and portions of 007 & 012; and 8-2-001:001, 022, 024, 025, and portions of 002 (Agenda Item D-1)- REJECT

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

The Office of Hawaiian Affairs (OHA) respectfully requests that you reject the Final Environmental Impact Statement, Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Makua Military Reservation, Island of O‘ahu, dated May 2025 (the FEIS), for failure to comply with the Hawai‘i Environmental Policy Act (HEPA), Hawai‘i Revised Statutes (HRS) chapter 343, and implementing regulations.

Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Mākua Military Reservation (MMR) are all areas with cultural and historical significance for Native Hawaiians, and comprise part of the Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom in which both OHA and the State hold an interest as trustees acting on behalf of Native Hawaiians and the general public. *See, e.g., Ching v. Case*, 145 Haw. 148, 176-77, 449 P.3d 1146, 1174-75 (2019) (“The most basic aspect of the State’s trust duties is the obligation to protect and maintain the trust property and regulate its use.”). As raised in OHA’s letter on the Draft Environmental Impact Statement,<sup>1</sup> this Board, acting in its capacity as trustee, must reject the FEIS for failing to meet HEPA’s public disclosure and mitigation requirements with respect to the following effects:<sup>2</sup>

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<sup>1</sup> See FEIS Vol. IV at pp. 89-97 (OHA Comment Letter dated July 24, 2024). Please note that for Volumes II-IV citations are made to PDF page numbers due to non-consecutive pagination in the appendices.

<sup>2</sup> “Effects may include ecological effects . . . aesthetic effects, historic effects, cultural



- **Land retention:** The FEIS does not examine a shorter-term lease or fee alternative, or disclose valuation methodology as necessary to ensure protection of the Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom and the social, cultural, and political rights of Native Hawaiians;
- **Clean up and protection of ‘āina:** The FEIS does not disclose or examine the Army’s plans for restoring leased lands, erroneously insisting that clean-up should be addressed only after lease expiration under the Comprehensive Environmental Responsive, Compensation, and Liability Act (CERCLA); and
- **Cultural Practices:** The Cultural Impact Assessment (CIA) fails to adequately investigate and disclose cultural practices as necessary for the Board to complete its *Ka Pa‘akai* analysis prior to decision-making on lease renewal;
- **Cultural Resources:** The historic review process under HRS chapter 6E must be completed concurrently with HEPA to ensure identification and protection of ‘iwi kūpuna and other cultural resources within the affected areas; and
- **Natural Resources:** The FEIS does not disclose the status of compliance with existing Biological Opinions prepared by U.S. Fish and Wildlife Service to protect endangered native flora and fauna on the leased lands, or incorporate updated information from the Programmatic Biological Assessment currently under development.

OHA notes that a common thread in the Army’s position with respect to OHA’s comments is that these matters of significant public concern will be negotiated and decided at a later point in time, as between the State and the Army, or under a different regulatory regime, such as CERCLA. However, this is contrary to the Army’s legal obligations under HEPA to disclose potential effects for public review and comment, including proposed mitigation measures to address these effects.<sup>3</sup>

**HEPA is an early opportunity to ensure that ongoing discussions concerning the once in a lifetime expiration of the Army’s exiting sixty-five-year leases, and any potential renegotiation of lease terms, comply with governing law and the rights of Native Hawaiians and the larger public.** OHA urges the Board to hold the federal government to its duties under HEPA, consistent with its own duties as trustee of Hawai‘i’s public lands, which are comprised primarily of Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom.

#### I. The FEIS Does Not Disclose the Army’s Preferred Method of Land Retention

Established pursuant to the terms of Section 5 of the Admissions Act, the Hawai‘i State Constitution, Article XII, sections 4, 5, and 6, and HRS chapters 10 and 10H, OHA serves as a

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effects, economic effects, social effects, or health effects, whether primary, secondary, or cumulative, whether immediate or delayed.” Hawai‘i Administrative Rules (HAR) § 11-200.1-2.

<sup>3</sup> See, e.g., *Umberger v. Dep’t of Land & Nat. Res.*, 140 Haw. 500, 518, 403 P.3d 277, 295 (2017) (“If the fact that other laws and rules that facially appear to bear upon the environmental effects of an activity would exclude the activity from HEPA’s purview, then this would frustrate HEPA’s purpose of requiring agencies to appropriately consider environmental concerns in their decision-making process.”).

semiautonomous agency and trust vehicle for the betterment of the conditions Native Hawaiians. OHA's nine elected trustees exercise their powers "to manage and administer the proceeds from the sale or other disposition of the lands, natural resources, minerals, and income derived from whatever sources for native Hawaiians and Hawaiians, including all income and proceeds from that pro rata portion of the [public lands] trust." Haw. Const. Art. XII, § 6. OHA's duties include "serving as a "receptacle for reparations," and implementing "the recognition of the Native Hawaiian people by means and methods that will facilitate their self-governance." HRS §§ 10-3(6), 10H-2. Therefore, OHA has a paramount interest in preserving the corpus of the former crown and government lands of the Hawaiian kingdom until a resolution of Native Hawaiians' unrelinquished claims to these lands, including sovereignty and governance over a land base.<sup>4</sup>

The State and Federal governments have repeatedly recognized the obligation to preserve and protect the public land trust as "the foundation (or starting point) for reconciliation" with Native Hawaiians for historic wrongs. *Office of Hawaiian Affairs. v. Hous. & Cmty. Dev. Corp.*, 177 P.3d 884, 902 (Haw. 2008), *rev'd and remanded sub nom. Hawaii v. Office of Hawaiian Affairs.*, 556 U.S. 163 (2009) (reversed on other grounds).

[T]he Apology Resolution and . . . related state legislation clearly contemplate that native Hawaiians (1) "never directly relinquished their claims to ... their national lands to the United States," and (2) "are determined to preserve, develop and transmit to future generations their ancestral territory." As such, we believe and, therefore, hold that the Apology Resolution and related state legislation ... give rise to the State's fiduciary duty to preserve the corpus of the public lands trust, specifically, the ceded lands, until such time as the unrelinquished claims of the native Hawaiians have been resolved. Such duty is consistent with the State's "obligation to use reasonable skill and care" in managing the public lands trust and the Ahuna court's declaration that the State's conduct "should ... be judged by the most exacting fiduciary standards."

*Id.* at 905 (internal citations omitted). In 2013, the Hawai'i legislature by concurrent resolution recognizing the anniversary of the apology resolution: "reaffirm[ed] the State's commitment to reconciliation with the Native Hawaiian people for historical injustices, urg[ed] the federal government to advance reconciliation efforts with Native Hawaiians, [and] support[ed] efforts to further the self-determination and sovereignty of Native Hawaiians." S. Con. Res. 2 (2013).

The analysis presented in the draft EIS and final EIS related to the method and term of retention is inadequate and fails to adequately recognize the Native Hawaiian people's unrelinquished governance claims to the Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom. OHA's July 2024 Comment Letter requested that the Army include a shorter lease term as an alternative. *See* FEIS Vol. IV at pdf p. 90. The Army's response to this comment notes that a minimum 25-year lease is necessary, but does not explain why the different and beneficial effects of a shorter lease term are not separately considered in the FEIS. *See* FEIS Vol II at pdf p.12. OHA repeats its call for the Army to consider as a separate and independent alternative a shorter term of retention and disclose what beneficial effects a shorter term would

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<sup>4</sup> OHA recognizes that referring to the Kingdom of Hawai'i crown and government lands as "ceded" or "public" lands is problematic, but use these terms herein when quoting respective sources directly.

have, including for Native Hawaiian governance efforts.<sup>5</sup>

Moreover, given the long-term consequences of land alienation particularly with respect to Native Hawaiian governance rights, the Army must disclose and analyze as a separate alternative the effects of retaining state-owned land through fee simple ownership rather than lease extension. A separate, stand-alone alternative offering that kind of transparent analysis would properly alert the public and elicit their comments on the negative effects of this method of land retention, more completely fulfilling the underlying purposes of HEPA. The Army would also need to respond to community comments on this alternative, once properly and transparently raised, *see* HAR § 11-200.1-26, which thus far has not occurred.

Finally, while OHA is opposed to alienation of the Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom whether through long-term lease or fee simple acquisition, OHA notes that retention of State lands, if pursued, must involve more than simply a “fair market value” evaluation, which refers to monetary valuation of the affected lands. Rather, any retention must include mitigating measures appropriate to the level of harm including, but not limited to, for example, a long-term community benefits package for Native Hawaiians including a commitment to assist with governance initiatives, and definitive commitments for long-term restoration and reforestation activities. OHA repeats its call to be included in any negotiations on land retention to ensure representation of Native Hawaiian interests in the disposition of Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom.

## II. The FEIS Does Not Disclose Means and Methods of Clean-Up and Restoration

As a trustee of the Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom, and of the Native Hawaiian people’s unrelinquished claims to self-governance, OHA is also concerned with the failure of the FEIS to clearly set out the Army’s plans for clean-up and restoration of lands it proposes to return to the State. This is particularly true with respect to lands within MMR, which are identified in the FEIS as a “duded impact area . . . where explosive ordnance was fired and where UXO may be present.” FEIS Vol. I at 2-21. Clean up of leased lands is a necessary condition precedent to make good on any promise to “return” Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom, as made clear by the community’s ongoing struggle to remediate Kaho‘olawe years after return to State control.

To ensure that any “unretained lands” are in fact available for community use, OHA urges the Board to reject the FEIS and demand more information from the Army consistent with community comments including basic information such as the estimated costs and timeline of fully restoring lands used for military training activities for the past 65 plus years. While it may be consistent with CERCLA to delay analysis of clean up means and methods, as by the Army asserted throughout the FEIS, Vol. I at ES-15, 2-3, 3-169-71, it is not compliant with HEPA or the State’s interest in fully understanding the consequences of lease extension. Destruction and contamination of the ‘āina itself through military use is one of the primary foreseeable

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<sup>5</sup> OHA also supports the request made by Earthjustice in its comment letter requesting that the Army consider an alternative with more protective lease terms, including use of cultural monitors during military activities, and ongoing restoration of destroyed ecosystems and removal of UXO throughout the lease term, rather than at lease termination. *See* Vol IV at pdf pp. 279-84.

environmental consequences of lease extension that must be analyzed under HEPA. *See* HAR 11-200.1-27 (a FEIS “shall fully declare the environmental implications of the proposed action and shall discuss all reasonably foreseeable consequences of the action.”). Whether long-term cleanup and restoration is practicable and feasible, and whether it becomes less practicable and feasible with continued military use, is crucial to evaluating lease renewal options. Without this analysis, the FEIS is deficient and must be rejected.

### III. The CIA Is Deficient for Purposes of HEPA and the Required *Ka Pa‘akai* Analysis

As the Board is aware, the landmark Hawai‘i Supreme Court case *Ka Pa‘akai O Ka ‘Āina v. Land Use Commission*, requires that prior to making discretionary decisions that may affect Native Hawaiian rights—such as lease renewal—government agencies must identify:

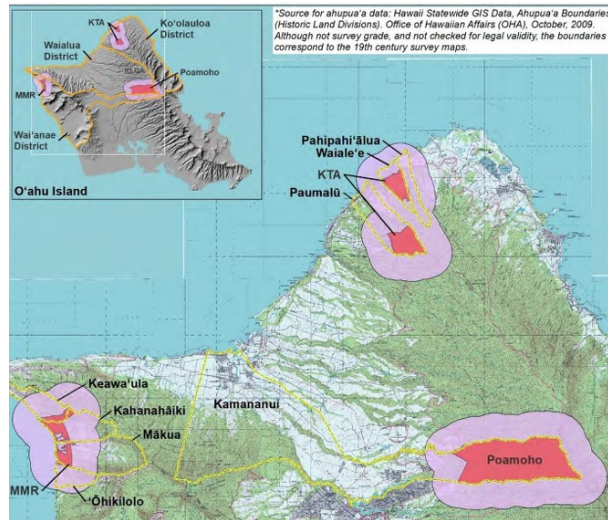
(1) the . . . scope of “valued cultural, historical, or natural resources” in the [affected] area, including the extent to which traditional and customary native Hawaiian rights are exercised in the . . . area; (2) the extent to which those resources—including traditional and customary native Hawaiian rights—will be affected or impaired by the proposed action; and (3) the feasible action, if any, to be taken by the [State] to reasonably protect native Hawaiian rights if they are found to exist.

94 Haw. 31, 35, 7 P.3d 1068, 1072 (2000). Thus, the preliminary step to conducting the *Ka Pa‘akai* analysis is to identify the scope of cultural practices exercised in the relevant area, which can only occur by consulting relevant parties with knowledge of the affected area.

In conducting a cultural practices investigation, the Army’s consultant talked to only ten practitioners, all of whom were identified using a list provided by the Army. FEIS Vol. II at pdf p. 39, 48. While the CIA asserts that ten is the average number of practitioners consulted for an EIS, *id.* at pdf p. 48, n. 10, this is as notably small number of individuals to consult for the purpose of identifying the range of cultural practices associated with *three* geographically distinct areas of the island. *See* Vol. II at pdf p. 26 (Figure 1 reproduced below). Even using the consultants’ own metrics, thirty individuals would appear to be the minimum number for a reasonable consultation given the constitutional magnitude of affected rights,<sup>6</sup> and the known presence of native plant and animal species within the affected areas that could be utilized by cultural practitioners. Accordingly, the FEIS Should be rejected as failing to adequately identify and disclose potential effects to cultural practices. *See* HAR §§ 11-200.1-24(p),-28(b)(2).

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<sup>6</sup> “Data and analyses in a draft EIS shall be commensurate with the importance of the impact.” HAR 11-200.1-24.



OHA and others suggested during comments that additional outreach needed to be done to more fully assess the range of cultural resources and practices associated with the leased lands, and how Army operations affect those resources and practices. *See, e.g.,* FEIS Vol. IV at pdf p.92; (OHA Comment Letter); pdf p. 414 (Kahea Comment Letter). Unfortunately, no further outreach was done prior to publication of the FEIS, rendering the disclosure of effects to cultural resources and practices completely deficient. Moreover, the Army did not substantively respond to OHA's comment on this point to explain why additional outreach may not have been feasible, FEIS Vol. II at pdf p. 513, which is another basis upon which the Board should reject the EIS. *See* HAR 200.1-28(b)(3).

#### IV. The FEIS Does Not Adequately Identify Potential Effects on Cultural Resources

OHA supports calls from the State Historic Preservation Division (SHPD) to reject the FEIS for failure to adequately conduct archaeological surveys and identify cultural resources that may be located within the leased lands. Without a proper accounting of historic properties, the Army is unable to propose mitigation for any adverse effects to historic properties. Mitigation could include measure such as preservation of sites that are important to Native Hawaiians, and data recovery for sites that are vulnerable to damage. As noted, in the FEIS, only 26% of KTA Tract-3 and 0% of Poamoho have been surveyed, leaving potentially significant cultural resources unidentified and unprotected. Vol. I at 3-108, 3-115.

In OHA's July 24, 2024, comment letter on the first DEIS, we stressed the importance of conducting the HRS 6E process concurrently with the HRS 343 process to facilitate public review and comment on the historic and cultural effects of proposed lease extension:

"The intent of HRS Chapter 343 is to ensure a project's impact to the environment is fully considered in the planning process and to integrate mitigation where needed to minimize significant environmental harm. Surveys are conducted to identify various environmental components (i.e., flora, fauna, historic properties) so that any adverse impacts from the proposed action can be evaluated. In determining whether historic properties will be adversely impacted, the HRS 6E review process is essential to

identifying historic sites and generating mitigation commitments in consultation with the SHPD. Any identified sites and resulting mitigations made during the HRS 6E review process are typically included in the environmental review for an adverse impact analysis and public comment.

HAR 11-200.1-18(d)(7) and (8) requires that impacts be identified and proposed mitigations be included within an environmental assessment. If HRS 6E is conducted after the HRS 343 process, impacts to historic and cultural resources cannot be identified as the means to identify these environmental components are not yet completed.”

FEIS Vol. I at pdf p. 92-93. While the Army again insisted upon its right to punt historic review further down the road in response to this comment, this position is at odds with HEPA’s disclosure requirements, and compels this Board to reject the FEIS. *See* HAR §§ 11-200.1-24(p)

V. The FEIS Does Not Adequately Identify Potential Effects on Natural Resources

OHA supports the Department of Land and Natural Resources, Division of Forestry and Wildlife, in their comments concerning deficiencies in the FEIS regarding the status of mitigation measures to protect endangered flora and fauna as required in existing Biological Opinions. OHA raised similar concerns in its comment letters, highlighting the importance of native plants for cultural practitioners. FEIS Vol IV at pdf p. 94. While the Army in the FEIS provides some additional information regarding the implementation of existing mitigation measures required through past Biological Opinions, information from the updated Programmatic Biological Assessment currently under development must be integrated to ensure the best scientific information is available for the Board’s consideration during the lease review process.

Mahalo for your careful consideration of the comments provided by OHA and the larger community as the Board exercises its duties as trustee in considering the adequacy of the FEIS presented by the Army to inform the State’s negotiations and decision making with respect to disposition of Native Hawaiian Crown and Government Lands of the Hawaiian Kingdom at Kahuku, Wahiawa, and Mākua.

‘O wau iho nō me ka ‘oia ‘i‘o,

A handwritten signature in cursive script, appearing to read "Stacy Ferreira".

Stacy Ferreira  
Ka Pouhana, Chief Executive Officer



## **Agenda Item D-1 – Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation**

Aloha Chairperson and Members of the Board,

Hui Aloha Aina o Honolulu, strongly urges you to vote to reject or “not accept” the Final Environmental Impact Statement (FEIS) for continued military use of the O’ahu Military Leases. We reject this FEIS and oppose any new lease or retention by the U.S. Army for the areas of Mākua, Kahuku, and Kawaihoa-Poamoho.

### **Environmental and Health Hazards**

The Army admits unexploded ordnance and possible chemical contamination but refuses to test soil or water. Despite knowing that they have used serious contaminants. At Mākua, promised Phase 2 testing hasn’t been done, and no sampling occurred at Kawaihoa–Poamoho. This casual failure to stick to their word reminds us that the military cannot be trusted. Risks to health, ‘āina, and wai remain unaddressed. Fire danger is also downplayed, despite military-caused wildfires and climate threats. There’s no wildfire plan or climate adaptation strategy—issues even the EPA flagged. As we can see from the fire currently burning at Schofield, the military is dangerously incompetent when it comes to fires and is unprepared to even take care of themselves. Most critically, the Army still has no credible cleanup plan, leaving communities to bear the long-term impacts of military damage.

### **Disregard for Culture, Ecosystems, and Accountability**

The FEIS lacks updated cultural site surveys, ignores iwi kūpuna, and cultural access continues to be controlled by the military. It is offensive to have to beg the military to escort us onto our own lands. Community concerns were dismissed, violating cultural rights. Meanwhile, the Army continues training in endangered species habitat without required permits, offering no credible mitigation. Cumulative harms—cultural, ecological, and environmental—are ignored, and like Red Hill, the military evades responsibility and cleanup. We have already dealt with their version of a “clean up” through Kaho’olawe, we know when left to their own devices they will leave their unexploded ordinances in the ground.

### **Failure to Consider Alternatives**

The Army failed to evaluate meaningful non-military alternatives, despite repeated calls from Native Hawaiian communities and agency reviewers. Instead, the FEIS focuses solely on



maintaining military control, ignoring the potential for restorative uses of these lands. Decommissioning or transition to civilian, cultural, or conservation use was not seriously explored—undermining the purpose of an environmental review and violating both legal and ethical standards for land stewardship. These lands are not bargaining chips, they must be returned in totality to the people.

This FEIS is not a genuine assessment—it's a justification for continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent, signaling that environmental law, cultural protections, and public input mean nothing. We urge you to vote no and reject this FEIS for its failure to address contamination, cultural and ecological harm, and for violating the public trust.

Unlike with the U.S. military, you can trust us as an organization made up of all O'ahu residents to uphold our kuleana to ou 'āina to protect, mālama, and defend it until the very last aloha 'āina.

Mahalo for your time and for upholding your kuleana to protect our 'āina too.

Me ka 'oia'i'o,  
Hui Aloha Aina o Honolulu, Central Committee

K. 'Ilima Long  
Joy Lehuanani Enomoto  
Kylie Noelani Akiona  
Lauren Taijeron  
Kawena'ulakokalā Kapahua  
Hilina'i Sai-Dudoit  
Noel Shaw  
Ruth Coules  
Leimaile Barrett  
'Alihilani Katoa  
Corey Asano



**From:** [M Loo](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda item D-1  
**Date:** Thursday, June 26, 2025 9:24:44 AM

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Aloha BLNR,

I am submitting this testimony with my ‘ohana to ask that you support the points made in the DLNR Staff report responding to the Army’s EIS for Kahuku, Makua, and Poamoho and **soundly reject the FEIS. It is unacceptable. The Army’s actions are unacceptable.**

‘Ohana Loo-Ching (Maile, Kalei, Kupuoha)

**From:** [Chevy Lopes](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 9:46:17 AM

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Aloha, My name is Chevy Lopes and I have been a member of the dirtbike community for 11 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

**From:** [Bella Lynch](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the EIS for O'ahu Leased Land  
**Date:** Thursday, June 26, 2025 8:21:31 AM

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Aloha Mai Kākou,

My name is Bella Lynch and I am a lifelong resident of O'ahu. Being a keiki growing up in central O'ahu, I saw and heard first hand the impact that having active military presence has on the land they immediately occupy, as well as in the neighboring communities. I grew up hearing loud explosive noises that would set off car alarms, scare my pets and frightened my friends and I who were trying to play in the neighborhood. We grew used to seeing plumes of smoke rising from the Waianae mountain range from other military activities.

Beyond my personal experiences, I am aware that there is insufficient information to determine the the environmental impact a lease renewal would have on Kahuku, Makua, and Kawaihoa. The military has taken no accountability for the damage and desecration of other expired leased lands they have on our aina, and nothing in the EIS shows them doing so moving forward.

I implore the board to reject the army's final EIS report, so that the land can be returned to the people who will truly Aloha 'Āina, and our kanaka and the environment can begin the long healing process.

Mahalo,  
Bella Lynch

**From:** [Mehana Makainai](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony Submission - US Army's Final Environmental Impact Statement  
**Date:** Thursday, June 26, 2025 8:57:35 AM

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Aloha mai,

I am submitting this written testimony in strong opposition to the Bureau of Land and Natural Resources approving the U.S. Army's Final Environmental Impact Statement.

I urge the BLNR to reject the FEIS and to terminate future lease agreements with the army for lands including the Kahuku training area, Kawaihoa-Poamoho and the Makua Military reservation.

The current lease that began in 1964 and expires in 2029 has caused irreparable harm to the environment and communities. Sacred burial sites and cultural sites have been neglected, endangered species' habitats have been abused, water sources have been polluted, depleted uranium has been introduced to the environment and so much more damage has occurred in the past 60 years. The army's impact on these lands has been detrimental to the health of our islands and communities and it is imperative that this type of destruction comes to an end.

As the lease for these lands approaches expiration, now is the time to ensure that the continued degradation of land, natural resources and cultures ends. The army will never adequately protect the environment, as demonstrated by their poor FEIN, and any attempt to retain lands for future use is at the great expense of our people and islands.

Reject the army's FEIN and begin the process of rehabilitating these lands.

Mahalo

Mehana Maka'ina'i

**From:** [R.N. Mansfield Jr](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] U.S. Army's Final Environmental Impact Statement (FEIS)  
**Date:** Thursday, June 26, 2025 7:43:58 AM

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Aloha kākou,

Mahalo for the opportunity to provide testimony.

This mana'o is from me, a resident of Moiliili, an octogenarian, my ohana is Nawahine no Olowalu a me Waihee, Maui; Pohina no Hoopuloa and Milolii, Kona Hema, Hawaii; Hookano no Ale'amai, Moku o Hilo, Hawaii.

thank you,  
robert nawahine mansfield jr  
2139 Algaroba Street #620  
Honolulu, HI 96826

**From:** [Kelsey Mapa](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands  
**Date:** Thursday, June 26, 2025 8:42:32 AM

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Aloha members of the Board of Land and Natural Resources,

My name is Kelsey Mapa, and I am a resident of Maui, but I was born on Oahu, have family there, and care deeply about the 'aina. **I am submitting testimony in strong opposition to renewing the U.S. Army's lease for State-owned lands at Kahuku Training Area, Kawailoa-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,  
Kelsey Mapa  
Pukalani, Maui

**From:** [Tehani Mapuhi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 9:50:18 AM

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Aloha, My name is Tehani and I have been a member of the dirtbike community for the past 5 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Sent from my iPhone

**From:** [Mahina](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: No Lease Renewal for U.S Military on Hawai'i Lands  
**Date:** Thursday, June 26, 2025 9:00:55 AM

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Aloha members of the Board of Land and Natural Resources,

My name is Mahina Martinson and 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,

Mahina Martinson

New York, New York / Waimea, Hawai'i

**From:** [UCSC Mauna Kea Protectors](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Final EIS Testimony  
**Date:** Thursday, June 26, 2025 5:21:50 AM

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Hello,

We, UC Santa Cruz Mauna Kea Protectors, reject the proposed Final Environmental Impact Statement (EIS) for the Army Training Land Retention, and we urge the State of Hawai'i's Board of Land and Natural Resources to reject it as well. This plan would give 6,332 acres of stolen O'ahu land, beholden to the Kānaka Maoli, to the US Army. We submit this written testimony in solidarity, recognizing the similarities in protecting Mauna Kea from scientist land desecration and protecting O'ahu from military land desecration.

In 1968, this same board sold a 65-year lease for land on Mauna Kea to the University of Hawai'i, who has desecrated this sacred land with thirteen observatories. 20 years ago, NASA found that the telescopes were a severe environmental impact to the Mauna, despite the insistence from astronomers and scientists that these telescopes provide minimal environmental destruction. In 2019, 38 people were arrested when protesting the construction of the TMT on Mauna Kea, 33 of whom are kūpuna. These leases that do not consider the negative environmental and cultural impact greatly harm the Kānaka Maoli community.

We will not let what has happened to Mauna Kea happen to O'ahu. Militarization or scientific exploration, both leave a nasty stain on the environment and culture of Hawai'i. The EIS is lackluster, providing inadequate environmental and cultural impact analysis, insufficient disclosure of military activities on O'ahu, a lack of accountability for past environmental and cultural damages, and lacking plans for future remediation efforts. This plan restricts cultural access in its policies, hindering Kānaka Maoli cultural practices, as well as access to historical and sacred sites. The proposed land to be leased are sacred burial sites, endangered species habitats, and birth stands of generational families. Leasing this land to the US Army directly goes against mālama 'āina. We urge the board to uphold mālama 'āina and reject the Final EIS.

Kū Kia'i Mauna,  
Mauna Kea Protectors at UCSC

--

Sign our petition: <http://www.ucscmkp.org>

Join us on social media!

Instagram: [ucscmaunakeaprotectors](#)

Facebook: Mauna Kea Protectors at UC Santa Cruz

Email: [ucscmaunakeaprotectors@gmail.com](mailto:ucscmaunakeaprotectors@gmail.com)

**From:** [Nikkira McCall](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Written Testimony of Nikkira McCall  
**Date:** Thursday, June 26, 2025 6:13:12 AM

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Aloha,

My name is Nikkira Santrice McCall. As a Black American woman standing in solidarity with all Native peoples, I share this to speak on behalf of Native Hawaiians. For all that came before, all that are here now, and all that are to come.

To have the United States Army illegally occupy land and then rent land out for measly dollars per year is not only against integrity but against humanity. Morals. Lessons taught to us for generations, gathered by ancestors who have toiled to find the most efficient, effective, and SUSTAINABLE ways to live in harmony with the land. Once you're out of harmony, the fresh waters stop flowing, the trees stop fruiting, and the soul becomes rotten.

The Army's effect on Hawai'i has gone on for too long, and they have only brought destruction. Too many streams have dried up, native flora and fauna eradicated, amidst the many cultural, historical places and practices lost. They claim to have the "military defenses to protect us", but we would not need protecting if it were not for their ILLEGAL OCCUPATION in the first place.

They do not deserve a place here. They do not deserve to bomb innocent land, animals, plants, or anyone, for that matter. They do not deserve to continue their mindless and greedy warfare practices on sacred islands. They do not deserve to have access to their wahi pana, the sacred places of Hawaiians. Once you destroy the land, you destroy the people.

Kūla'ila'i, the reef at Mākua beach, is where La'ila'i rose after she descended from the heavens. She is the first woman, the mother of every Hawaiian, hence the name Mākua (Parent). Once a beautiful, bountiful valley filled with songs of gratitude and grace, it is now lonely and destitute, with only foreign militants as its population. The US military had their warships out in the water on Mākua Bay, shooting 250lbs, 500lbs, and 1,000lbs bombs over the beachgoers and indigenous families who lived there still (nearer the shore). They say you could feel the shockwaves reaching to Lualualei Valley. I work in Lualualei Valley, on MA'O Organic Farms. I hear the bombs from Schofield over the mountain of Pūhāwai. I feel the quakes and the cries of the land. I feel the intent of the US Army, and we should have to debate over the fact that they are not welcome here.

Mahalo for listening,  
Nikkira Santrice McCall

**Protect Kaho‘olawe ‘Ohana  
1733 Wili Pa Loop, B-1  
Wailuku, Hawai‘i 96793**



June 26, 2025

**Chair and Members of the  
Board of Land and Natural Resources**

**Re: Final EIS for Army Training Land Retention at Kahuku Training Area,  
Kawailoa-Poamoho Training Area, and Mākua Military Reservation**

The Protect Kaho‘olawe ‘Ohana offers the following testimony, strongly urging the Board of Land and Natural Resources to **reject** the U.S. Army’s Final Environmental Impact Statement (FEIS) for “Army Training Land Retention of State Lands at Kahuku Training Area, Kawailoa-Poamoho Training Area, and Makua Military Reservation Island of O‘ahu.”

The Protect Kaho‘olawe ‘Ohana is a grassroots nonprofit organization formed in 1976 and dedicated to the island of Kaho‘olawe and the principles of Aloha ‘Āina throughout Hawai‘i. In our work to heal Kaho‘olawe after nearly 50 years of desecration due to live-fire activities conducted by the U.S. Navy, we pay respect to, and strengthen our relationship with the land. We also work to protect the natural and cultural resources of our ancestral lands on the other islands throughout Hawai‘i and Moananuiākea.

The island of Kaho‘olawe serves as a cautionary tale of the destruction and subsequent ineptitude for remediation that the U.S. Military has historically demonstrated in Hawai‘i, and that must not be repeated in Kahuku, Kawailoa, Poamoho or Mākua, O‘ahu.

The FEIS fails to provide adequate biological, water and cultural baseline data, and is therefore fatally flawed, and should be rejected by the Board of Land and Natural Resources.

First, the FEIS fails to provide a current or at least recent biological assessment. The Army primarily relies on a Biological Opinion from 2003 - 22 years ago! This decision defies common sense and invalidates the FEIS. Without knowing the biological populations that exist on the lands in question, the Army cannot assess the environmental impacts of its proposed action on those environmental resources, and therefore has limited itself from being able to discuss all reasonably foreseeable consequences.

Second, the FEIS fails to provide adequate data on the impacts to water quality and quantity. Noting the lack of sufficient information in the FEIS, the Commission on Water Resource Management commented: “a better understanding of all of the potential sources of contamination, which may even include oil leaks from vehicles, or residual unexploded ordinances, would help to inform the regulatory agencies about best management practices to employ to ensure that ground water protection is optimized.” The issue of water is important to the Protect Kaho‘olawe ‘Ohana because the Navy’s activities on Kaho‘olawe resulted in

permanent damage to the island's aquifer. The military has a history of harm and destruction to fresh water resources in Hawai'i, which should at the very least necessitate a thorough substantive discussion in the FEIS regarding the sources of potential water contamination and the potential impacts to O'ahu's irreplaceable water resources. Without meaningful input from the relevant agencies on how the proposed action would impact water resources, the Board cannot discuss the foreseeable consequences. Thus, the Board should reject the FEIS.

Third, the FEIS fails to provide a complete inventory of archeological sites within the State-leased lands as it has only conducted archaeological surveys on a portion of the lands. Without a full inventory of the culturally and historically significant sites in the area, the Board cannot consider the full impacts the proposed action could have. Given the Army's failure to provide the Board with a complete inventory of cultural or historic sites that may be impacted by the Army's renewed lease of public lands, the Board does not have a full range of impacts to discuss the foreseeable consequences of accepting the FEIS. Therefore, the Board must reject the FEIS.

In addition to grave flaws in the contents of the FEIS, the Board must also consider the compatibility of continued live fire training and associated pollution on the conservation lands and public trust resources that it is tasked to protect and manage. The Department of Land and Natural Resources' mission is to:

Enhance, protect, conserve and manage Hawaii's unique and limited natural, cultural and historic resources held in public trust for current and future generations of the people of Hawaii nei, and its visitors, in partnership with others from the public and private sectors.

The US military has repeatedly failed to demonstrate that they are able to adequately cleanup areas of Hawai'i after use and contamination of these precious 'āina. On the island of Kaho'olawe, the U.S. Navy signed a Memorandum of Understanding on May 6, 1994 committing to clean 100 percent of the island's surface of unexploded ordnance and 30 percent of the island to a depth of 4 feet. They cleared only 77 percent of the surface lands, of which only 9 percent was cleared to a depth of 4 feet. As a result, 23 percent of the island and **all** of the surrounding ocean has not been cleared.

Today, the O'ahu lands at continued risk are 1,170 acres at Kahuku Training Area, 4,370 acres at Kawaihoa-Poamoho Training Area, and 782 acres at Mākua Military Reservation. In total, the Army seeks to retain 6,322 acres on O'ahu after years of polluting the lands with bombing and live fire training without conducting cleanup, and after years of preventing or severely limiting and discouraging traditional and customary practices on those lands. There has never been any demonstration that the U.S. Army can and will clean these landscapes. Kahuku, Kawaihoa, Poamoho, and Mākua are cultural landscapes and contain traditional native forests with immense history and cultural significance. The military's use of these biodiverse cultural landscapes was, is, and will continue to be in direct conflict with the allowed uses on conservation lands.

Lastly, Native Hawaiian consultation appears to be inadequate for this FEIS as noted throughout the Staff Submittal for this Board meeting. The Army has not done its own *Ka Pa'akai* Analysis,

nor provided this Board with adequate feedback from Native Hawaiian consultation such that this Board could fulfill the *Ka Pa'akai* Analysis requirement of Hawai'i law.

In light of the reasons provided above, as well as the multiple concerns stated in the Department's staff submittal with comments from various agencies, the Protect Kaho'olawe 'Ohana strongly urges the Board to reject the FEIS.

Mahalo for the opportunity to testify on this important matter for the future of Hawai'i.

A handwritten signature in black ink, appearing to read "Davianna Pōmaika'i McGregor". The signature is fluid and cursive, with a prominent dot over the 'i' in "Pōmaika'i".

Davianna Pōmaika'i McGregor  
Protect Kaho'olawe 'Ohana

**From:** [Cassandra Mckay](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] In solidarity to with Hawaiians  
**Date:** Thursday, June 26, 2025 6:29:32 AM

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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.
  5. These lands should be restored and returned to Native Hawaiian peoples.
- Please listen to the people of the land who care for it most.

Cassandra M -Washington

,

Chair Dawn Chang  
Board of Land and Natural Resources  
1151 Punchbowl St., Room 132  
Honolulu, Hawai‘i

**RE: Decision Regarding Final EIS for the Army Training Land Retention** June 27, 2025

Nani i ka hala ka ‘ōiwi o Kahuku.<sup>1</sup>

Pukana wai o Kahuku.<sup>2</sup>

Kahuku ‘āina lewa.<sup>3</sup>

There is a long familial relationship between the lands of Hawai‘i and the people who live on it intrinsically woven into the history and genealogies of Native Hawaiians. This deep-seated connection lives on through our mo‘olelo (stories), our daily practices, and our vision for the future. While we appreciate the changes made between the draft Environmental Impact Statement and this final version, the Council for Native Hawaiian Advancement still **urges a No Action Alternative for Kahuku Training Area.**

The Final Environmental Impact Statement (FEIS) represents a significant step in the right direction. We first want to note with appreciation that the Army’s Preferred Alternative now includes No Action (lease non-renewal) for all state-leased lands at Kawaihoa–Poamoho Training Area and Mākua Military Reservation, as well as a drastically reduced footprint at Kahuku Training Area (KTA). According to the FEIS, the Army plans to relinquish 100 percent of the state land at Poamoho (4,370 acres) and Mākua (760 acres), and to downsize its use of state land at KTA from approximately 1,170 acres to about 450 acres (Tract A-1). A 93 percent reduction in leased acreage on O‘ahu is a welcome development to Native Hawaiians, environmental stewards, and community activists who have long sought the return of these lands. The FEIS affirms the position that not renewing the leases is both viable and the preferred path forward for all parties involved. This is a positive step that acknowledges the voices of the community and honors the cultural significance of these ‘āina (lands), but we assert that more can be done.

The lands in question are not just real estate – they are ancestral lands with deep cultural, spiritual, and historical importance to Native Hawaiians. The FEIS process and community input highlighted that these areas are part of Hawai‘i’s sacred heritage. In the case of Kahuku in Ko‘olauloa, for example, traditional mo‘olelo speak of revered places and legendary figures

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<sup>1</sup> *The body of Kahuku is beautified by hala trees.* ‘Ōlelo No‘eau #2272.

<sup>2</sup> *The water outlet of Kahuku.* ‘Ōlelo No‘eau #2731. Refers to the outlet of an underground stream that once flowed from Kahuku to Waipahu.

<sup>3</sup> *Kahuku, an unstable land.* ‘Ōlelo No‘eau #1319. O‘ahu, according to legend, was once two islands that grew together. Kahuku is the part that bridges that gap.



connected to this landscape. The ‘ōlelo no‘eau (proverbs) at the beginning of this comment note the prior landscapes and legends of Kahuku.

The FEIS and public testimonies acknowledge that continued military use poses inherent conflicts with Native Hawaiian cultural practices and values. In fact, Hawai‘i’s Office of Conservation and Coastal Lands commented that “*the no action alternative would provide the best benefits to the land, cultural resources and traditional Hawaiian practices,*” noting the unresolved “incompatibility of military training with the cultural and traditional practices of the Hawaiian people (mālama ‘āina).” In other words, restoring these lands to peaceful use is essential for cultural healing.

The long history of military training, from live-fire exercises to low-flying helicopters, has not only physically impacted the ‘āina, but also spiritually disrupted places that were once quiet pu‘uhonua (sanctuaries) for our people. By choosing not to renew leases on the majority of these lands, the Army is taking a positive step to honor the federal Trust Relationship with the Native Hawaiian community. This gesture begins to address the historical pain of land alienation and militarization in Hawai‘i and opens the door for ‘āina-based cultural practices to resume unimpeded. We encourage the Army to view this decision as an opportunity to strengthen its relationship with the community, a relationship that has been strained by past actions. High-profile incidents—such as the contamination of O‘ahu’s aquifer at Red Hill, the unexploded ordinances in the former Waikoloa Maneuver Area, and the bombing of Kaho‘olawe—have greatly eroded public confidence in the military’s stewardship of Hawai‘i’s environment. By choosing to return lands and prioritize environmental and cultural protection, the Army can begin to restore trust and demonstrate respect for Hawai‘i’s people, land, and culture.

While we applaud the Army’s decision to relinquish all state lands at Poamoho and Mākua, we must express our ***strong preference for the No Action Alternative at KTA’s Tract A-1*** as well. In the FEIS, the Army’s Preferred Alternative for KTA involves retaining “Tract A-1” (approximately 400–450 acres of state land) for continued use, while returning the remaining tract (approximately 720 acres, known as Tract A-3) to the State of Hawai‘i. We understand that Tract A-1 encompasses important training areas—including jungle maneuver sites and landing zones for helicopter exercises—and that the Army hopes to continue utilizing this parcel for readiness purposes. We acknowledge the military value that Kahuku Training Area has provided for decades; indeed, it comprises rugged terrain suited to jungle warfare training and is one of the few places on O‘ahu for certain aviation drills. However, we believe that the cultural and environmental importance of this remaining tract outweighs its marginal utility for training.

We sincerely appreciate your time and consideration regarding the concerns listed above. We look forward to working together to ensure plans are implemented responsibly and with aloha.

Me ka ha‘aha‘a,

**Madelyn McKeague**  
Advocacy Director, CNHA

**From:** [Kealohilani Minami](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: BLNR FEIS Hearing 6/27/25  
**Date:** Thursday, June 26, 2025 6:09:50 AM

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Aloha Land Board Members:

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

These places are much more significant than what's regarded in these proposals—they are **wahi pana**, sacred and beloved places that hold the stories and legacy of Kānaka Maoli. They are also 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, not to mention the ongoing environmental neglect with the military with Red Hill that negatively impacts humans & nature alike.

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's long overdue for the military to rectify the damage that has been done for decades, especially in the face of contemporary issues we face. It is time to release military hold on these lands, and allow the generational caretakers to begin the healing process.

Sincerely,  
Kealohilani Minami

**From:** [Rita Miyamoto](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the Army's FEIS  
**Date:** Thursday, June 26, 2025 6:50:32 AM

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Aloha,

I support the points made in the DLNR Staff Submittal on item D1 and the Staff recommendation to reject the FEIS. Mahalo to BLNR and DLNR for doing the right thing.

The US military has proven to be irresponsible and not good stewards of the land or people. They have done more harm than good.

Mahalo,  
Reiko Miyamoto 96818

**From:** [‘Āina Momona](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] O'ahu lease renewal for Army training areas  
**Date:** Thursday, June 26, 2025 8:41:07 AM

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

RE: Request to Reject the Army's Final Environmental Impact Statement for the Lease  
Renewal of Lands on O‘ahu

Aloha Chair Chang and Members of the Board,

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

Despite having had decades to prepare for the expiration of their leases the Army has failed to conduct timely surveys and account for impacts to environmental and cultural resources. They have no plan to pursue compliance with Hawai‘i's land use laws and no proposals to remediate and clean up the lands that are to be relinquished back to the "state." The Army has repeatedly ignored or dismissed recommendations from the DLNR staff even after their FEIS for Pōhakuloa Training Area was rejected in May. The Army is moving forward with this FEIS to retain training areas on O‘ahu as if community concerns, DLNR's input, and Hawai‘i's laws do not matter.

Allowing a long-term lease renewal to proceed without new field surveys, without a good faith effort to understand what resources exist on these lands, and in ignorance of how our community feels about a lease renewal would be a clear violation of HRS Chapter 343 and a betrayal of the Board’s responsibilities under the public trust doctrine. The FEIS provides no updated archaeological inventory, no current biological data, and no real understanding of how this proposal might impact burials, sacred sites, endangered species, or traditional practices. This is not pono—and it is not legal.

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

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

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

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

Me ka ‘oia‘i‘o,

Walter Ritte  
Founder, ‘Āina Momona

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

**Walter Ritte, Founder**

‘ĀINA MOMONA

P.O. Box 924 | Ho‘olehua, HI 96729

[www.kaainamomona.org](http://www.kaainamomona.org)

**From:** [Steven Mosk](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] KTA leased Army area  
**Date:** Thursday, June 26, 2025 8:47:59 AM

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Aloha, My name is Steven Mosk Sr. and I have been a member of the dirtbike community for 35 years. As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes.

On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited if any Army training at all.

Let's face it, the people of Hawaii have spoken loud and clear, please do what is right, preserve what's left of the aina for the people to enjoy and have a place to come regularly.

The Army has anniated the lands for so long, it is purely ignorant and disrespectful to let this continue.

I respectfully request your intervention in this matter.

very respectfully,

Steven Mosk Sr.  
808-347-4259

**From:** [dave mulinix](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] To BLNR Testimony Regarding Army FEIS for 6/27/25 Meeting  
**Date:** Thursday, June 26, 2025 9:21:13 AM

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Aloha Chair Chang and Members of the Board of Land & Natural Resources (BLNR),

My name is Dave Mulinix, Hawaii State Representative of Greenpeace Hawaii and on behalf of our thousands of members and supporters statewide we strongly urge BLNR to REJECT the legally deficient Final Environmental Impact Statement (FEIS) for the Army's retention of lands on O‘ahu.

Based on multiple legitimate legal and environmental concerns we request that BLNR reject the Army's Final Environmental Impact Statement (FEIS) because it does not analyze all potential impacts, including cumulative and secondary impacts, of all possible land retention options.

The FEIS is replete with deficiencies that even the staff of the Department of Land and Natural Resources (DLNR) itself have declared it insufficient to meet the requirements of the law - including the DLNR's water commission, division of aquatic resources, land division, state historic preservation division, division of forestry and wildlife, and office of conservation and coastal lands(!).

This comes after years of repeated recommendations by DLNR staff and others as to what the FEIS needed to include -- which the Army chose to ignore. An acceptance of this faulty FEIS would only legitimize the Army's repeated flaunting of its legal responsibilities, and the hard work of the DLNR and the community to provide it with good faith recommendations and guidance throughout the environmental review process.

Our further concerns include:

- \* 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 groundwater. 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.

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

Mahalo nui for your consideration of this testimony.

David Mulinix, Hawaii State Representative, Greenpeace Hawaii

**From:** [Karen Murray](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject FEIS from the military  
**Date:** Thursday, June 26, 2025 7:09:26 AM

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To the BLNR:

I support the points made in the DLNR staff submittal on Item D1 and the staff recommendation to Reject the FEIS.

The military is being disingenuous using outdated data and making dubious projections.

Above all, Hawai'i are small but precious islands in the middle of a vast ocean. Our lands and ocean should not be misused and polluted any further with ordnance. Military use is not allowed in Conservation districts for good reason and should not be allowed, not only in hard-won Conservation districts, but anywhere on Hawaiian lands and waters.

For our future and our children's future, clean land and ocean.

Mahalo.

Karen Murray

**From:** [Queen Maile](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1 to Reject FEIS  
**Date:** Thursday, June 26, 2025 10:46:31 AM

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

Subject: Testimony on Agenda Item D-1

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

*My name is Maile Naehu, 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,*

**Tanya Marie Mailelani Naehu**

Kumu/Educator, Performer, Consultant, Hawaiian Cultural Arts  
Owner/Co-founder of Ka Hale Hoaka | School of Hawaiian Knowledge  
Program Director for Hui o Kuapā 501c3  
Kūmimi, Moloka'i, Hawai'i  
<https://www.kahalehoaka.com>

<http://www.huiokuapa.org/>

**From:** [alika napier](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Kahuku Dirtbike Park  
**Date:** Thursday, June 26, 2025 8:42:51 AM

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Aloha, My name is Alik Napier and I have been a member of the dirtbike community for 10 years. As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park.

On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited closures.

Aloha  
Alik

**From:** [Mitchell Olson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] testimony KTA leased Army area  
**Date:** Thursday, June 26, 2025 6:51:09 AM

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Aloha, My name is Mitchell Olson and I have been a member of the dirtbike community for over 50 years.

As you are aware, the Kahuku Dirt Bike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5000 riders without a legal place to ride. I am very concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirt bikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirt Bike Park remains open and accessible, with limited Army closures.

Sincerely  
Mitchell Olson

**From:** [Okikanani](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Army's legally deficient FEIS for the retention of lands on O'ahu.  
**Date:** Thursday, June 26, 2025 7:31:56 AM

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

My name is Dana Ong 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,  
Dana Ong

**From:** [Kateri Chiu](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony: No Lease renewal for Army Occupation of Hawai'i lands  
**Date:** Thursday, June 26, 2025 8:17:13 AM

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Aloha Board of Land and Natural Resources. My name is Kateri Orange and I am a resident in Kihei, Maui. I am submitting testimony in strong opposition to the renewal for the US Army's lease for state owned lands at Kabuku, Kawaihoa-Poamoho and Mākua Military reservation. I respectfully ask the BLNR to reject the renewal and support the return of these lands to the people of Hawai'i, nā Kānaka 'Ōiwi.

After 65 years there has been much damage and toxins that will take time and energy to repair. Every decision is vital, every choice we make today has lasting repercussions throughout time.

Thank you so much for your time and attention to this issue.

Sincerely,

Dr. Kateri Orange, PsyD.



**From:** [Tommy Orange](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony from a Contemporary Native American author  
**Date:** Thursday, June 26, 2025 8:31:25 AM

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Aloha Board of Land and Natural Resources. My name is Tommy Orange and I am a (temporary) resident in Kihei, Maui. I am submitting testimony in strong opposition to the renewal for the US Army's lease for state owned lands at Kabuku, Kawaihoa-Poamoho and Mākua Military reservation. I respectfully ask the BLNR to reject the renewal and support the return of these lands to the people of Hawai'i, nā Kānaka 'Ōiwi.

After 65 years there has been much damage and toxins that will take time and energy to repair. Every decision is vital, every choice we make today has lasting repercussions throughout time.

Thank you so much for your time and attention to this issue.

Sincerely,

Tommy Orange (Author of the novels There There and Wandering Stars)  
Professor at the Institute of American Indian Arts in Santa Fe

**From:** [Captain Oscar](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 8:15:11 AM

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Good Morning, To Whom It May Concern - *Chair Chang and Members of the Board of Land and Natural Resources*,

I'm writing today with deep concern to urge you to *reject* the Army's Final Environmental Impact Statement (FEIS) regarding the retention of lands on O'ahu.

This document is deeply flawed ... Many of the same issues that led to the rejection of the Pōhakuloa FEIS are present again here: the absence of proper cultural and biological surveys, poor community consultation, and unresolved land use compliance questions. On top of that, the FEIS doesn't adequately address the serious risks to our streams, groundwater, or provide real plans for land remediation.

Accepting this document as-is would send a troubling message ... that the rights of Native Hawaiians, the health of our environment, and the laws that are meant to protect both can be set aside without consequence.

You have a responsibility to uphold the public trust and to protect Hawai'i's land and future generations. Please reject the FEIS.

Mahalo nui for your time and consideration.

Oskar

**From:** [Madison Owens](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda item D-1  
**Date:** Thursday, June 26, 2025 9:00:00 AM

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

My name is Madison Owens 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.

I stand in support of the DLNR staff's submittal and their recommendation to reject the FEIS. As with the FEIS for Pōhakuloa, the O'ahu FEIS is also replete with legal flaws - so much so that nearly all of the Department of Land and Natural Resources' divisions found this document to be legally and substantively deficient.

As your own staff submittal explains, the FEIS relies on outdated biological studies and fails to provide a current baseline of data on endangered and native species. The Division of Aquatic Resources repeatedly requested for stream survey information that the Army has refused to provide. As a result, we have little to no information about the stream and estuary life, agricultural practices, or the communities placed at risk under the proposed retention scenarios.

Moreover, the Army has failed to adequately consult with kūpuna and Native Hawaiian cultural practitioners. The FEIS does not provide sufficient detail to conduct a Ka Pa'akai analysis, as required to assess impacts on Native Hawaiian traditional and customary rights under Article XII, Section 7 of the Hawai'i State Constitution.

The Department of Defense has made clear it has little regard for the health and well being of our people and 'āina. From the Navy's poisoning of 93,000 residents after multiple Red Hill fuel spills, to the U.S. Marine's refusal to recognize the families and keiki it is exposing to toxic lead contamination in the sand, fish, and homes surrounding its Pu'uloa firing range, to the Army's attempt to cover up its use of depleted uranium at Schofield and at Pōhakuloa, untold generational harms have been inflicted on our islands.

As demonstrated yet again in this FEIS, the Army refuses to provide critical information regarding the contamination of our water supply from its proposed actions, and offers no real commitment to remediate the lands and waters it has contaminated with toxic chemicals and unexploded ordinance. To accept this FEIS—which is already incomplete, outdated, and legally deficient—would be a disservice to the public trust and a forfeiture of the environmental and cultural benefits of land return.

But even beyond its legal and scientific failures, we must also question the premise. No Environmental Impact Statement or study will be able to fully account for the harm caused by the military's continued occupation of these lands. No document can fully capture the depth and longevity of the generational harm that has been inflicted on O'ahu's 'āina, wai, and people.

The idea that we need an EIS to prove what generations of Native Hawaiians and impacted communities already know—that this occupation is not pono—is not only insulting, it is a

form of delay and denial. We cannot continue to rely on incomplete biased frameworks like this FEIS document to legitimize or excuse continued militarization. We do not need another study to tell us that the Army's practices are toxic, harmful, and unacceptable. We already live with the consequences. We know the damage. We see it in our water, our ecosystems, our cultural sites, and the health of our communities. We cannot afford to wait any longer to stop this injustice.

The Army's attempt to frame their presence as a matter of "national security" must not exempt them from legal and ethical scrutiny. If any other applicant submitted such an incomplete and inadequate proposal, it would be rejected outright. The military must not be allowed to operate with impunity, above the law and outside the reach of public accountability.

This Board faces a decision with far-reaching implications—not only for the land, but for the integrity of our legal systems and future generations. You can either stand for the law, the land, and the people—or reinforce a precedent that allows unchecked militarization, environmental harm, and the erasure of Native rights under the guise of necessity. Delaying meaningful action only deepens the burden we place on our keiki.

Enough is enough. The future of Hawai'i depends on us choosing accountability over convenience, restoration over extraction, and peace over militarization. Let us return Hawai'i to its rightful role as a piko of peace—not a sacrifice zone for 'national security.'

Please reject this FEIS. Uphold your kuleana to the 'āina, to our laws, and to the people of Hawai'i.

Mahalo nui for your time and consideration.

Sincerely,

Madison Owens

**From:** [Avalon](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Writing in Opposition of the Army's O'ahu FEIS  
**Date:** Thursday, June 26, 2025 9:00:11 AM

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Aloha kākou, my name is Avalon Paradea and I am writing in strong opposition of the Army's final environmental impact statement for the lands they currently lease from the state in Kahuku, Mākua, and Kawaihoa-Poamoho. The only acceptable action is the No Action Alternative. The 6,332 acres of state owned lands need to be deoccupied of their presence, for the good of 'āina and community alike. I include several key points to consider herein.

#### ES.9: Environmental Impacts

The FEIS makes clear, verbatim, that "implementation of the Proposed Action... would result in significant, adverse impacts on land use... cultural practices... and environmental justice."

#### ES.12 Incomplete Information/Unresolved Issues

The FEIS claims that, following lease expiration, the Army "retains responsibility for cleanup of closed ranges" following the CERCLA process. However, this process is not well-defined, either in the FEIS or in supplemental appendices. There is no definitive understanding of what cleanup will look like when the Army deoccupies the state owned lands. Given the sloppy "cleanup" we have witnessed in past scenarios, such as the deoccupation of Kaho'olawe, the Army needs to clearly define the parameters by which they will go about restoring these 6,332 acres of land once they leave.

#### 3.3 Biological Resources

All of these occupied lands possess countless native species, many of which are under threat or are critically endangered. The FEIS makes it clear that the No Action Alternative is the only method by which biological resources may be left unharmed by military activity. Army training threatens plants, insects, and other lifeforms through pollution, threat of fire, and trampling. The unique 'āina of these wahi pana deserve respect and ongoing protection.

#### 3.4 Historic and Cultural Resources and 3.5 Cultural Practices

Much of the 6,332 acres of occupied land have never been properly surveyed by local cultural resource teams, or require new surveys. There are likely to be many historic structures and items that require proper documentation and care. The occupation of the Army precludes Kānaka 'Ōiwi from being able to safely access these sacred spaces to conduct ceremony, protocol, and stewardship. This has had a tremendously negative impact on our Native Hawaiian community, as folks have been removed from these spaces for decades.

I have personally conducted work as a cultural resource technician at the Kahuku Training Area and as a conservation technician in the upper Poamoho region of the Ko'olau Mountains. I can attest to the incredibly rich landscape of ahu, heiau, and stacked rock walls in Kahuku – all of which are under ongoing threat due to Army training and none of which can be properly cared for by 'Ōiwi of that region. Similarly, Poamoho is a phenomenal landscape of native birds, plants, insects, and fish, yet pollution and the threat of destruction due to fire or other related tragedies leave this 'āina vulnerable. The Army cannot guarantee the safety of these lands under their occupation.

In summation, I urge the BLNR to reject the Army's FEIS in favor of the No Action Alternative. Please prioritize the welfare of Hawai'i's environment and people, now and for generations to come.

Mahalo.

Avalon Paradea  
Waikōloa, Hawai‘i

**From:** [Amy Parsons](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 8:45:55 AM

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

I'm writing today to 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.

It must also be considered that the damage already done to Hawaii by the military thus far may be impossible to repair in our lifetime.

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,

Amy Parsons

**From:** [JULIE PAUL](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda D-1  
**Date:** Thursday, June 26, 2025 10:10:54 AM

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(Protecting the "Misuse" of our lands by the Military!!!!)

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

RE: Request to Reject the Army's Final Environmental Impact Statement for the Lease Renewal of Lands on O'ahu

Aloha Chair Chang and Members of the Board,

I write to respectfully urge the Board of Land and Natural Resources to reject the acceptance of the Final Environmental Impact Statement (FEIS) for the proposed long-term lease renewal of the U.S. Army's training areas on O'ahu at Mākua, Poamoho, and Kahuku. The Army's FEIS fails to satisfy the requirements of Hawai'i Revised Statutes Chapter 343 because it relies on outdated data and does not include any current biological or archaeological field surveys. As a result, there is no current inventory of the natural and cultural resources present on these public trust lands—lands that are ecologically vital, culturally sacred, and deeply tied to Native Hawaiian identity and practice.

Despite having had decades to prepare for the expiration of their leases the Army has failed to conduct timely surveys and account for impacts to environmental and cultural resources. They have no plan to pursue compliance with Hawai'i's land use laws and no proposals to remediate and clean up the lands that are to be relinquished back to the "state."

Allowing a long-term lease renewal to proceed without new field surveys, without a good faith effort to understand what resources exist on these lands, and in ignorance of how our community feels about a lease renewal would be a clear violation of HRS Chapter 343 and a betrayal of the Board's responsibilities under the public trust doctrine. The FEIS provides no updated archaeological inventory, no current biological data, and no real understanding of how this proposal might impact burials, sacred sites, endangered species, or traditional practices. This is not pono—and it is not legal.

These are ceded lands—lands taken from the Hawaiian Kingdom and held in trust by the State—and they must be treated with care, accountability, and respect.

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

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

Aloha,  
Julia Paul  
45 year resident of the Big Island  
Taxpayer and voter





## HOUSE OF REPRESENTATIVES

*Hale o nā Luna Makaʻāinana*

STATE OF HAWAII  
STATE CAPITOL  
415 SOUTH BERETANIA STREET  
HONOLULU, HAWAII 96813

### **TESTIMONY IN OPPOSITION TO AGENDA ITEM D-1 Board of Land and Natural Resources – June 27 2025**

Chair Case, Vice-Chair Gon, and Members of the Board,

Mahalo for the opportunity to testify on the Army's Final Environmental Impact Statement (FEIS) concerning long-term retention of State lands at Kahuku, Kawaihoa-Poamoho, and Mākua. I write in unequivocal opposition to acceptance of this document. Hawai'i Administrative Rules § 11-200.1-28 is clear: a final EIS must disclose all identifiable environmental impacts and must demonstrate that public and agency comments have been substantively addressed. The FEIS in front of you does neither. Instead, it leans on biological surveys from the 1990s and early 2000s—long before Rapid 'Ōhi'a Death, unprecedented wildfire cycles, and accelerating climate stress reshaped these ecosystems. With no current baseline, the Board cannot credibly weigh the fate of imperiled species such as the 'ua'u, 'a'o, pueo, 'i'iwi, and 'ōpe'ape'a, nor gauge the cascading ecological effects of continued high-impact training.

Process matters as much as data, and here the process fell apart. DLNR staff explicitly instructed the Army to engage the 'Aha Moku System and kūpuna with generational relationships to these ahupua'a. The Army delayed that consultation until after the FEIS was published, effectively silencing those voices in the official record. Worse, only nineteen percent of the affected lands have received archaeological inventory. Unexamined cultural sites linked to mo'olelo—Kelea's surf across Kahuku's reefs, Pa'ahana's journey in the Wai'anae uplands, and many more—may be bulldozed, cratered, or contaminated without ever being acknowledged. Such omissions violate the spirit of HAR § 11-200.1-25, erode the integrity of the environmental review process, and disrespect Kānaka 'Ōiwi stewardship obligations embedded in Article XII of our Constitution.

Equally alarming is the document's silence on the threat to our public trust wai. The fuel-spill disaster at Kapūkākī taught us that military assurances are no safeguard when groundwater is at stake. Yet the FEIS skirts PFAS monitoring, ignores residual explosive compounds documented at other ranges, and offers no hydrological modeling of contaminant pathways into the Ko'olau and Wai'anae aquifers—lifelines that supply O'ahu's households and farms. Article XI charges this Board with protecting wai for present and future generations; accepting an EIS that glosses over contamination risks would be an abdication of that constitutional trust.

Beyond data gaps, the FEIS refuses to examine the genuinely feasible alternatives that people across O'ahu have proposed. Ecological restoration, cultural education centers, community agroforestry, and climate-resilient reforestation each serve the public interest far better than continuing live-fire exercises on already-scarred land. Omitting serious analysis of these alternatives turns the document into a foregone-conclusion justification, not the balanced decision-making tool Chapter 343 envisions.

Precedent matters. If the Board accepts this deficient FEIS from the State's largest tenant, every future applicant—from resort developers to private utilities—will brandish your decision as a license to shortcut.

Chapter 343 is designed as the floor of environmental protection, not the ceiling. Lowering that floor invites a race to the bottom that will haunt this Board—and the communities it serves—for decades.

The Board's own staff, together with the Division of Forestry and Wildlife, the State Historic Preservation Division, the Office of Conservation and Coastal Lands, and the Commission on Water Resource Management, have all concluded that the FEIS is insufficient. Their collective expertise should be decisive. Under HAR § 11-200.1-28(b)(2), the remedy is obvious: decline acceptance, and require the Army to redo its homework. That means comprehensive, peer-reviewed biological and hydrological surveys that reflect current realities; full archaeological inventories and genuine, early consultation with the 'Aha Moku and lineal descendants; transparent analysis of alternative, non-military land uses; and enforceable commitments to remediate contamination already present.

Only after that work is complete can the Board, acting as trustee over Hawai'i's precious lands and waters, render an informed decision aligned with the Constitution, Chapter 343, and the values of those who call these islands home. Anything less invites irreversible ecological harm, erodes public faith, and breaks the promise we owe to keiki yet unborn.

Mahalo for your vigilance and your commitment to safeguarding our natural and cultural heritage.

Respectfully submitted,

A handwritten signature in black ink, reading "Amy Perruso". The signature is fluid and cursive, with the first name "Amy" and last name "Perruso" clearly legible.

**Rep. Amy Perruso**

House District 46 – Wahiawā, Whitmore Village, Waialua



**HOUSE OF REPRESENTATIVES**

*Hale o nā Luna Makaʻāinana*

STATE OF HAWAII  
STATE CAPITOL  
415 SOUTH BERETANIA STREET  
HONOLULU, HAWAII 96813

**June 26, 2025**

RE: June 27<sup>th</sup> 2025 BLNR Agenda Item D1

**Subject: Testimony Opposing the Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation.**

Aloha Chair Chang and Honorable Board Members,

As Representative for Hawai'i State House District 13, I appreciate the opportunity to provide testimony opposing the acceptance of the U.S. Army's Final Environmental Impact Statement (FEIS) for the retention of state lands at the Kahuku Training Area, Kawaihoa-Poamoho, and Mākua Military Reservation on O'ahu.

After applicable divisions of the Department of Land and Natural Resources (DLNR) reviewed the FEIS for the Army Training Land Retention on O'ahu, DLNR staff recommended rejecting the FEIS. These agencies have each identified critical flaws in the FEIS submitted by the U.S. Army Garrison Hawai'i (USAG-HI), reinforcing why this document is not acceptable for Board approval. These concerns include:

**Department of Land and Natural Resources (DLNR) – Land Division (LD)**

- Issue: The FEIS lacks rigorous, alternative-based analysis and adequate baselines for environmental and cultural information.
- Key Concern: Staff emphasized that the "Preferred Alternative" is misleading and cautioned the Board not to accept a document that fails to provide meaningful comparative impact evaluation across all alternatives.

**DLNR – Office of Conservation and Coastal Lands (OCCL)**

- Issue: The proposed military activities are incompatible with Conservation District regulations under HAR Chapter 13-5.
- Key Concern: The FEIS does not acknowledge the need for reclassification or offer lawful alternatives; current proposed uses, such as live-fire training, are not permitted.

**DLNR – Division of Forestry and Wildlife (DOFAW)**

- Issue: The FEIS omits critical biological surveys and underestimates risks to endangered species and native ecosystems.

1 of 2

Representative Mahina Poepoe  
House District 13  
415 S. Beretania Street, Room 331  
Honolulu, HI 96813  
[reppoepoe@capitol.hawaii.gov](mailto:reppoepoe@capitol.hawaii.gov)  
(808) 586-6790

- Key Concern: Prior Army activity has already caused extensive wildfire damage and habitat degradation; the document fails to propose adequate mitigation, restoration, or monitoring measures.

**DLNR – State Historic Preservation Division (SHPD)**

- Issue: Failure to fulfill Section 106 consultation requirements and conduct thorough archaeological and cultural resource surveys.
- Key Concern: The FEIS disregards the presence of iwi kupuna and the presence of other archeological and cultural sites, fails to engage appropriate cultural descendants and community practitioners, and fails to include significant published material relevant to the proposed areas of impact.

Additional deficiencies were raised by:

**Hawaii Department of Health (DOH) – Hazard Evaluation and Emergency Response (HEER) Office**

- Issue: Inadequate assessment and disclosure of toxic contamination.
- Key Concern: The document downplays contamination by heavy metals and petroleum products and lacks a clear cleanup strategy or health risk evaluation.

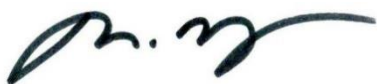
**Office of Hawaiian Affairs (OHA)**

- Issue: The FEIS lacks meaningful engagement with Native Hawaiian stakeholders and ignores the cumulative cultural harms of military occupation.
- Key Concern: OHA raised alarm over desecration of ancestral sites and the long-term spiritual and material harm to Kānaka Maoli communities.

These agencies, each with expertise and statutory responsibility over Hawai'i's natural, cultural, and public health resources, have consistently identified substantial flaws in the FEIS. Collectively, their findings demonstrate that the document does not meet the minimum standards of HAR Chapter 11-200.1, and should be rejected.

I urge the Board to uphold the integrity of Hawai'i's environmental review process and reject acceptance of the FEIS.

Mahalo nui,



Representative Mahina Poepoe  
District 13

**From:** [Naiya Raphael](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Non-Acceptance of the U.S. Army FEIS  
**Date:** Thursday, June 26, 2025 7:24:27 AM

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Aloha Land Board Members,

My name is Naiya Raphael, and I am writing to express 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 urge the land board to **REJECT** the U.S. Army's Final Environmental Impact Statement (FEIS).

These lands are not just training grounds—they are sacred spaces deeply rooted in the identity, spirituality, and generational knowledge of Kānaka Maoli. Within them are burial sites, ceremonial spaces, and fragile native ecosystems that deserve protection.

The U.S. Army's long history in Hawai'i demonstrates a consistent failure to respect or protect these wahi pana. The FEIS is insufficient and should be rejected for the following reasons:

1. It provides an inadequate environmental and cultural impact analysis.
2. It lacks sufficient disclosure of military activities on leased lands adjacent to federal lands.
3. It includes restrictive cultural access policies that hinder Kānaka Maoli
4. Approval of the FEIS ultimately conflicts with the BLNR's constitutional duty to mālama 'āina. The BLNR has an obligation to protect these lands—not to extend their use for military purposes that have historically proven harmful.

The FEIS fails to adequately address these issues and overall lacks accountability for stewardship of the land. It does not provide a clear, enforceable plan for restoration, cultural access, or long-term conservation, nor does it acknowledge the damage done by military activities. Without a clear plan, we cannot know for certain that the U.S. military will clean up their mess and leave the land better than they have found it.

I respectfully urge you to **REJECT** the Army's FEIS and begin the process of returning these lands to community stewardship rooted in cultural practice, not just for ourselves but for generations that come long after us.

Mahalo for your time and consideration,  
Naiya Raphael  
O'ahu

**From:** [Carmela Resuma](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject The Army's FEIS For Kahuku, Kawaihoa-Poamoho, And Mākua  
**Date:** Thursday, June 26, 2025 12:35:21 AM

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Aloha Land Board Members:

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

Mahalo,  
Carmela Resuma  
O'ahu

**From:** [Gabrielle Rochon](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 7:47:40 AM

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

*My name is Gabrielle Rochon 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,*

*- Gabrielle Rochon (she/her)*

Aloha Board of Land and Natural Resources,

My name is Alyssandra Rousseve, and I am a Hydrologist V, Native Hawaiian Water Rights and Watershed Planner for the Commission on Water Resource Management, however I am testifying in my individual capacity.

I'm here to testify as a veteran and former military officer that was stationed here on O'ahu. I saw firsthand the types of destructive training exercises that were conducted on both land and sea. No matter the military branch, every command is responsible for a training cycle to ensure it maintains their weapon qualifications and readiness for war. The types of qualifications and readiness that I witnessed included deploying artillery ranging from 9mm guns, to rifles, to machine guns, to sea to land missiles, surface to air missiles, surface to surface missiles, as well as qualifications for handling toxic material such as aqueous film foaming foam and other fire retardants and maintenance equipment. Training cycles, depending on the nature of the attempted qualification, may happen every couple of years to multiple times within one year. They occur for both for the command unit as a whole, as well as the individual service member. One qualification attempt may need to happen more than once if the individual or command does not meet their minimum standards and requirements. That means that countless individual service members and command units are putting out a plethora of pollutants including heavy metals, petroleum hydrocarbons, other chemicals, and PFAS into the land and ocean. For example, I've included a map (created by the non-profit group, Environmental Working Group) showing that in the United States alone, there are 720 military sites with known or suspected discharges of PFAS. This includes Hawai'i Island, O'ahu and even Kaua'i. Globally there are 750-800 military bases worldwide conducting training and qualification cycles. The absence of data for potential contamination within this EIS should not be a reason to not deny the EIS. The state is required to abide by the precautionary principle.

Additionally, in a time when Hawai'i is more concerned about fire risk, any type of training involving the use of live fire exercises and heavy flammable and toxic equipment increases the risk of fires, especially in places like Mākua, Poamoho, and Kahuku. Even if they aren't conducting live fire training exercises today, it doesn't preclude them from needing to in the future, considering the political climate we find ourselves in today.

Additional talking points I'd like to bring forward is a summary of the legal problems and concerns of the Final EIS:

- Reliance on decades old biological surveys, with no current baseline information
- No standards or status updates for impacts to native and endangered species and any needed mitigation work
- No stream surveys
- Lack of needed surveys for historic sites and cultural resources
- Lack of inclusion of published mo'olelo in the EIS cultural impact assessment
- A lack of consultation with Aha Moku and key cultural knowledge keepers, as requested by LD staff and the Board. It was not until after the publication of the EIS, did the Army finally reach out to Aha Moku.
- A lack of sufficient information to conduct a Ka P'akai analysis of impacts to constitutionally protected Native Hawaiian traditional and customary practices
- Insufficient information on potential contamination sources to determine impacts to groundwater
- Inconsistency of planned uses with conservation district and forest resource regulations, and no plan to pursue compliance with Hawai'i's land use laws
- Lack of concrete proposals to remediate and clean up lands that may be relinquished back to the state

U.S military presence in Hawai'i has shown not only infrastructure failures (such as at Red Hill, Kapūkakī), but a deeper, systemic neglect of Hawaiian rights and environmental stewardship for over a century. At its heart, the crisis is further evidence of the impacts of overlooking traditional knowledge and the inherent value of natural resources. It underscores the dire need for a foundational shift in how resources are treated and managed, moving away from practices that are detrimental and exploitative. The BLNR is in a unique position to be able to stop these detrimental practices due to its public trust



June 25th, 2025

responsibility to protect all natural resources for the benefit of all, as well as to ensure the social, economic, physical and mental well-being of current and future generations in accordance with Chapter 226, the Hawai'i State Plan. This action item is part of the planning for current and future generations. Between the years 2028-2031, 46,471.1 acres of leased military land will expire and giving this land back to Hawai'i in its current contaminated state should not be an option. As part of their lack of stewardship, the military should use part of its annual budget of over a trillion dollars to provide the finances and manpower to clean up their mess, including at Mākua, Poamoho, and Kahuku. The rejection of the Army's EIS is a must. How they return the land to the state needs to be seriously thought out and planned for.

Mahalo,

A handwritten signature in black ink, appearing to read 'Alyssandra Rousseve', with a stylized, cursive script.

Alyssandra Victoria Rousseve  
Retired Surface Warfare Officer, Lieutenant United States Navy  
Master's of Environmental Management, Natural Resources and Environmental Management  
Bachelor's of Science, Marine Biology

**From:** [Ann Shaver](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Agenda Item D=1, Makua  
**Date:** Thursday, June 26, 2025 10:06:34 AM

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I realize I am late in submitting my thoughts and request, so I will be brief.

The Army's FEIS is glaringly inadequate. It is a betrayal of public trust. Please demand a thorough, thoughtful review from the U.S. Army.

I live in Makaha and am aware of the long-standing problems between the Army and civilians over the decades regarding this beautiful and historically important valley. Please do your duty to protect the public trust and demand an adequate FEIS on our behalf.

~Ann S. Shaver

**From:** [Noel Shaw](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 8:43:26 AM

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Aloha Chair Chang and BLNR,

My name is Noel Shaw and I am a member of Hui Aloha 'Āina o Honolulu; a mother of three keiki kaiapuni; an O'ahu Hawaiian Homestead successor, current resident, and community leader; a farm to school advocate; and a Firewise community organizer. I urge you to REJECT the final EIS for the Army's retention of the lands of Kahauku, Poamoho, Kawaiola, and Makua Valley.

The FEIS is incomplete, misleading, and ignores major concerns brought forth by the DLNR and the community at large. There is a heightened duty that must be upheld to protecting our public trust lands, and this FEIS fails to meet that duty. O'ahu especially requires extra attention as it has suffered and is suffering so many of the negative implications of military presences here especially in the last couple years (see Red Hill fuel and forever chemical spills, Ewa beach led contamination, and Kaneohe marine corp base fecal matter releases).

The FEIS fails to demonstrate that the Army took the time to do their due diligence to provide proof of their comprehensive understanding of the interconnectedness of our environment and thus why the different arms of the DLNR have all called for the FEIS to be rejected. We are so much more informed about the realities of past harms caused by the military to our 'āina and so much more aware of the urgency as to how important it is to push back against them being able to continue to cause harm especially in light of climate change.

As a person of this moku, I have built intimate pilina with it, making myself and 'ohana part of this 'āina as well. The failure of the FEIS to include the human harms to those who develop intimate ties with the environment through their stewardship and cultural practices of this space will never be something the military commits to. For this FEIS, the Army demonstrated that by not consulting with kūpuna of the area until after they submitted it. These grave mis-steps will have and have had impacts that have shook the foundations of people connected to a space, dislodging them from care systems that have ensured their wellness for generations.

Scientific studies on toxic stress' impact on human health are rampant these days and prolonged and severe environmental impacts can be a cause for these stresses. When places you are dependent on for water, food, safety, or are culturally tied to for spiritual wellness, are under constant threat of harm- stress develops and the mind's ability to navigate changes disintegrates- forcing people into a constant state of fight, flight, or flee. When the FEIS even in its finalized state gives the green light to a group like the military who already caused so much harm for them to continue to potentially poison water, spill contaminants to etc., and disregard way of existing in a place that's been so serenely impacted- a form of toxic stress continues to sit on the body- that an abuser can abuse again and that the spaces meant to protect allow it to happen.

Again I call on the BLNR, to REJECT the Army's FEIS of their leased military holding at Kahuku, Makua, Kawaiola, and Poamoho. I beg of the BLNR to no longer allow for the violence of the US military to be perpetuated in our island home. Let us live!

Na'u me ka ha'aha'a,  
Noel

--

*Noel Kaleikalaunuoka'oia'i'o Shaw*

619-261-5894

**From:** [Kauwila Sheldon](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 4:17:36 AM

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To: [blnr.testimony@hawaii.gov](mailto:blnr.testimony@hawaii.gov)  
Subject: Testimony on Agenda Item D-1

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

My name is Kaylene Kauwila Sheldon. Ka'a'awa is my 'āina hānai and Kahuku is my 'āina hānau.

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,

Kaylene Kauwila Sheldon

**From:** [Janice Toma Shiira](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 1:17:58 AM

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Aloha Chair Chang and members of BLNR:

My name is Janice Toma Shiira with Shimanchu Mamuyaa and I strongly urge you to reject the Army's legally deficient final environmental impact statement (FEIS) for the retention of lands on Oahu.

The BLNR must not accept this faulty EIS. Please support our communities, our lands and the laws that protect our environment.

Mahalo

Janice

Sent from my iPhone

**From:** [Claire Shimabukuro](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [Claire Shimabukuro](#)  
**Subject:** [EXTERNAL] Military leases  
**Date:** Thursday, June 26, 2025 10:49:50 AM

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I am sending this testimony to urge you to reject the U.S. army's FEIS for the Makua Military Reservation, Kahuku Training Area and Poamoho.

The U.S. military's impact on Hawai'i's lands have been disastrous, evidenced by the contamination of our fresh water at Red Hill; occupation of prime lands which are not open to the public and the presence of a militarized culture, which is dangerous and detrimental to our island culture and daily lives.

Respectfully submitted,  
Claire Shimabukuro  
Honolulu, Hawaii

Claire Shimabukuro  
From my iPhone

Ask me how, together, we can insure that no person is lonely or goes hungry.

"Do all you can, with what you have, in the time that you have, in the place that you are."  
Nkosi Johnson, child diagnosed with AIDS

**From:** [Allison Shiozaki](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [tm.hawaiipeaceandjustice@gmail.com](mailto:tm.hawaiipeaceandjustice@gmail.com)  
**Subject:** [EXTERNAL] Direct Opposition to Acceptance of the Army's O'ahu Leased Lands FEIS  
**Date:** Thursday, June 26, 2025 8:10:09 AM

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

My name is Allison Shiozaki. I am a settler here in Hawai'i Nei, but I come making my best attempts to serve lāhui, the 'āina, the wai, the kai, the skies, and all the beyond human inhabitants of across the pae 'āina. My work is birth, raising young keiki, and tending 'āina. This is why 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)**, because the US military is the largest threat (not defender) of life itself in Hawai'i (and in fact across the globe). This is true in terms of being the largest point source polluter of the world, the ways in which the US military and those we fund are rapidly escalating global climate change in the wrong direction, and ever escalating more wars, putting Hawai'i as a target.

**I support DLNR Staff's submittal on Item D1 and the Staff recommendation to reject the FEIS.** 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. Ola i ka Wai! There's no life without water and the US military needs to clean up its messes and get out. They cannot be trusted with the health of our islands' water.

Legal Grounds for Rejection:

- Lacks Required Information: Baseline data is missing, making the FEIS legally and ethically insufficient.
- This is a conservation district: Military use is not allowed in a conservation district. Hawai'i as a whole is being illegally occupied by the US Military.
- 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.

Lastly, I would also like to request to attend by zoom for tomorrow's meeting.

In Truth and Kuleana,  
Allison Shiozaki  
Mountain View, Ola'a, Moku O Keawe  
925-895-3643

**From:** [Jamie Simic](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony Agenda Item D-1  
**Date:** Thursday, June 26, 2025 2:47:58 AM

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Aloha Chair Chang and Members of the Board of Land and Natural Resources,  
As an individual impacted by drinking water contamination due to the Navy's disregard for O'ahu's sole source aquifer underlying the Red Hill Fuel Facility, I urge you to reject the Final Environmental Impact Statement (FEIS) before you today.

I am particularly concerned by the comments submitted by the Commission on Water Resource Management, acknowledging historical instances of military use impacting ground water (including from the Red Hill Fuel Facility and Army training facilities in Waiawa), and urging the FEIS to include information on potential sources of contamination so that groundwater can be best protected from potential impacts. The FEIS failed to include this requested information.

As we have seen with the Red Hill water crisis, once an aquifer is contaminated, it may take decades or longer for it to recover - if ever.

The Navy turned its back on our water -- and thousands of people as well as O'ahu's primary drinking water source were tragically impacted. Please do not let the Army do the same - please uphold the requirements of Hawai'i's environmental review law, and reject this deficient FEIS.

Thank you for your consideration of my testimony.

Jamie E Simic

**From:** [Danielle Taylor "Ānelaonalani Smith"](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Item D-1: Urge to Reject the Final EIS for US Army Proposed Retention of Leased Lands on O'ahu  
**Date:** Thursday, June 26, 2025 8:44:01 AM

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Aloha mai e kākou,

Mahalo for your time and consideration on this historical decision. I am writing to urge the board to reject the Army's Final EIS because it fails to provide the public with enough information and our community is not able to make a well-informed decision about the long-term impacts of the U.S. Army's proposed retention of leased lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation.

In Section 3.6.5.3 - US Army references two studies done to confirm and identify the presence of contaminants in marine resources. These studies from 2009 and 2015 demonstrate that there is an ongoing issue of pollutants migrating offsite and negatively impacting the marine resources that people rely on for daily living. I imagine that if the US Army did another study, it would clearly determine if this has continued to be an issue and if it will be for another 10 years. It is irresponsible for the US Army to make projections for the future based on data from 10 to 20 years ago, when they have resources to bring that information up to date and answer these concerns and ensure public safety. Further, the US Army writes to suggest contaminants that have been found in marine resources are only related to live-fire training munitions - it is in poor judgement to assume this and fail to follow up on possible alternative contaminants that run off from pesticides and UXO. The army provides no thorough plan for monitoring and mitigation measures other than a mere reference to the Operations Range Management Program. This program does not provide any details of how run-off contaminants from activities beyond live-fire training are monitored, how frequently, and what measures are used in reducing and removing harmful materials.

The US Army fails to provide the public with enough information on UXO's in MMR and therefore the community is not able to make an informed decision on the public health and safety concerns that exist.

There is little to no mention of how the US Army plans to protect Native species in its efforts to control invasive species through pesticide use. The US Army cites that there is a history as recent as 1988 where they employed the use of pesticides that were later to be ruled harmful for the environment and banned from commercial uses. The US Army shows that these harmful chemicals in pesticides are also confirmed to impact marine resources and soil resources, and yet they provide no analysis of how their continued use of pesticide and herbicides will impact the region of influence. With a history of using chemicals that are later discovered to be harmful, the US Army provides no evidence to show that they will responsibly reduce, manage, administer, and maintain the use of harmful chemicals that appear in pesticides and herbicides. This is especially dangerous considering the importance of these lands for native plant survival and biodiversity in the urbanized West Oahu.

Mahalo for considering the concerns of the public.

E mālama,  
Danielle 'Ānelaonlani Smith

Master's Student, Native Hawaiian and Indigenous Health  
UH Mānoa Office of Public Health Studies

**From:** [Nahaku Spencer](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Kahuku Motocross  
**Date:** Thursday, June 26, 2025 7:03:04 AM

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Aloha, My name is Nahaku Spencer and I have been a member of the dirtbike community for 30 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Mahalo piha,  
Nahaku

**From:** [Kalei Stormcrow](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] please reject Army's EIS  
**Date:** Thursday, June 26, 2025 9:39:09 AM

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Aloha Land Board Members:

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **Kahuku Training Area, Kawaioloa-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, Kawaioloa-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,  
Kaleiheana Stormcrow  
Mountain View

**From:** [Maui Tauotaha](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] "Testimony for BLNR Hearing – Item D-1 (Army Training Land Retention FEIS)"  
**Date:** Thursday, June 26, 2025 8:23:49 AM

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Aloha nui e nā Lālā o ka Papa Kuleana ‘Āina,

Mahalo for your time and service. I’m writing today in 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. I urge you to reject the Army’s Final Environmental Impact Statement (FEIS).

These are not vacant parcels or mere acreage on a map — they are wahi pana, storied and sacred lands deeply connected to Kānaka Maoli identity and well-being. These ‘āina are home to burial sites, endangered species, and generational birth sands—places of memory and meaning that have endured despite decades of military misuse. Time and again, the Army has shown it cannot be trusted to steward these places with the care they deserve.

The scale and nature of military training activities are fundamentally incompatible with any vision for conservation, cultural restoration, or aloha ‘āina. Enough is enough. We cannot allow further desecration to continue under the guise of national defense.

The FEIS falls short in multiple critical areas and should be rejected for the following reasons:

- Inadequate Environmental and Cultural Impact Analysis
- Lack of sufficient disclosure of military activities on leased lands adjacent to federal lands
- Restrictive cultural access policies that block Kānaka Maoli from practicing traditions and visiting sacred sites

- Conflict with the BLNR's constitutional mandate to mālama 'āina

This decision is not just about a lease. It's about who we are, what we value, and whether we will uphold our kuleana to Hawai'i and future generations. Please, do what is pono. Reject the Army's FEIS and begin the long-overdue return of these lands to their rightful, caring hands.

Mahalo me ka ha'aha'a,

Maui Tauotaha

Kupa o O'ahu



**From:** [Laulani Teale](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [Laulani Teale](#)  
**Subject:** [EXTERNAL] Testimony on Item D1: Please REJECT Army EIS  
**Date:** Thursday, June 26, 2025 6:26:32 AM

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Aloha kākou,

I am testifying as an individual and on behalf of Ho‘opae Pono Peace Project **on**

**Item D-1** “[Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement \(EIS\) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, Island of O‘ahu, Tax Map Keys \(TMKs\) \(1\) 5-8-002:002; 5-9-006:026; 7-2-001:006; 6-9-003:001 \(por.\); 8-1-001:008 and portions of 007 & 012; and 8-2-001:001, 022, 024, 025, and portions of 002.](#)”

I am in strong support of the Department of Land and Natural Resources‘ staff submittal recommending that the FEIS be REJECTED.

In addition, I would like to note that the demilitarization of Hawai‘i and the restoration of our independence is a key to world peace, and that our organization urges DLNR to continue to work with the people of Hawai‘i toward these goals in every way possible.

Mahalo nui loa,

Laulani Teale

**From:** [Melissa Tomlinson](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 5:37:06 AM

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

I am writing in today to 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.

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

These governments waging their wars, destruction, and degradation in the name of security, but really for greed and power, are destroying our living planet, our living future. The whole world needs this violence to come to an end and especially Hawai'i. There is nothing pono in their presence there. When I visited O'ahu in 2017 I could see and feel the harm that has been caused by the u.s. and the military. It is absolutely heart breaking and absolutely must be stopped in our lifetime. I hope to witness the board do what is best for the people of Hawai'i. What is best will always be putting the health of the island and people above profits, allways, and there should be no question that rejecting the Army's inadequate and (more then likely) falsified EIS is what's Best.

Mahalo nui for your consideration.

Sincerely,

Melissa Jean Tomlinson

Lafayette, CA

**From:** [Derick Tugaoen](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] KTA training area  
**Date:** Thursday, June 26, 2025 6:19:07 AM

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Aloha, My name is Roderick and I have been a member of the dirtbike community for 18 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.



## *Kahuku Community Association*

5/26/2025

Board of Land and Natural Resources  
1151 Punchbowl St.  
Honolulu, HI 96813

RE: Testimony on Agenda Item D-1

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

Kahuku Community Association (KCA) strongly urges the Board to reject the U.S. Army's Final Environmental Impact Statement (FEIS) for continued use of public lands in Kahuku.

For decades, our community has lived with the impacts of military occupation, environmental contamination, unexploded ordnance, and restricted access to our ancestral lands. The Army's FEIS fails to meet basic legal, cultural, and environmental standards required under Hawai'i law. It lacks the necessary data for sound decision-making and ignores the serious concerns raised by DLNR's own divisions, including Aquatic Resources, Forestry and Wildlife, Conservation and Coastal Lands, Historic Preservation, and Land.

Recent reports of lead contamination in Ewa Beach linked to military shooting ranges underscore the urgency of this issue. Soil samples in that area revealed dangerously high levels of lead. Given that the Kahuku Military Training Area has been used for military training for decades, similar contamination is a very real concern. Yet the FEIS includes no current soil or groundwater assessments, leaving our community in the dark about potential health and environmental risks.

Among the many critical deficiencies in the FEIS:

- It relies on outdated or missing biological data and provides no current environmental baseline.
- It omits stream surveys and fails to assess potential groundwater contamination.
- It lacks updated surveys for cultural and historic sites and fails to meaningfully engage with cultural practitioners and knowledge holders.



## *Kahuku Community Association*

- It does not include a Ka Pa'akai analysis, as required by Hawai'i law, to assess impacts on constitutionally protected traditional and customary Native Hawaiian practices.
- It provides no credible plan for remediation or restoration of the land if returned to the State.
- The proposed uses are inconsistent with conservation district regulations, and the Army offers no plan to comply with land use laws.

These are not isolated or technical oversights. They reflect a pattern of institutional disregard for the law, for the 'āina, and for the communities most directly affected by military operations.

Kahuku is home to sacred sites, endangered species, native forests, and a resilient community committed to protecting our land, health, and future. The military's continued use of these lands not only blocks access to vital community resources but also prevents potential uses such as a desperately needed emergency evacuation area for the North Shore and Ko'olauloa. The lack of access further limits our ability to steward and benefit from the land that rightfully belongs to the people of Hawai'i.

We echo the strong stance taken in the recent rejection of the Pōhakuloa FEIS and join the growing call across Hawai'i for social and environmental justice. We respectfully call on the BLNR to uphold its responsibility as trustee of Hawai'i's public lands and reject this legally insufficient and indefensible FEIS.

Mahalo for your time and your commitment to protecting the people and lands of Hawai'i.

Respectfully,

*Sunny Unga (e-sign)*

Kahuku Community Association

Sunny Unga - President  
Evelyn Lane- Vice President  
Tatiana Santiago- Secretary  
Atalina Pasi - Director

**From:** [Isis Usborne](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony - Reject the Army FEIS  
**Date:** Thursday, June 26, 2025 9:29:13 AM

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Aloha e,

Apologies for the tardiness of this testimony. Please reject the FEIS - I support the points made in the DLNR Staff Submittal on Item D1 and the Staff recommendations.

Mahalo,

**Isis "Izzy" Usborne** (they/them)  
J.D. Candidate, Class of 2026  
William S. Richardson School of Law  
University of Hawai'i at Mānoa  
[iu@hawaii.edu](mailto:iu@hawaii.edu) | (808) 457-7516

**From:** [Sophia Van Wagoner](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [demsocoahu@gmail.com](mailto:demsocoahu@gmail.com)  
**Subject:** [EXTERNAL] Reject the US Military's FEIS for O'ahu  
**Date:** Thursday, June 26, 2025 8:37:16 AM

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Aloha Chair Dawn Chang and members of the BLNR,

I am writing to you today, to ask you to reject the US army's FEIS. With key environmental data missing and no thorough survey for cultural sites, we cannot expect the US military to mālama Mākua, Poamoho, and Kahuku.

It is our responsibility to take care of these lands for future generations; and the US military has demonstrated time and time again no interest in this imperative.

Thank you for your time and consideration.

Sophia Van Wagoner,  
Honolulu

**From:** [Heidi Waiamau](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] TESTIMONY IN OPPOSITION TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS) FOR MILITARY LEASE RENEWALS AT KAHUKU, KAWAIILOA-POAMOHU, AND MAKUA  
**Date:** Thursday, June 26, 2025 10:29:45 AM

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I am writing to urge you to reject the Army's Final Environmental Impact Statement (FEIS) for continued military use of lands at Kahuku, Kawaiiloa-Poamoho, and Mākua. This FEIS is incomplete and misleading. It ignores major concerns, minimizes real harms, and fails to meet the standards required under Hawai'i state law's and your duty to protect public trust lands.

Regarding environmental and health hazards The Army's own 2025 FEIS acknowledges unexploded ordnance (UXO), munitions residues, and the likelihood of PFAS contamination across Mākua, Kawaiiloa-Poamoho, and Kahuku. Yet, it offers no credible cleanup plan.

Promised Phase II testing at Mākua has not been completed, and no testing at all has occurred at Kawaiiloa-Poamoho-despite assertions of no significant impact (Vol. 1, Section 3.9). PFAS compounds (PFOS, PFOA, PFBS, PFNA, PFHxS) were detected at levels exceeding residential thresholds at Pohakuloa Training Area (PTA), but no PFAS-specific testing or remediation is planned for the disputed sites (Vol. 1, Section 3.9). The FEIS mentions fire risks and climate change but only promises "future coordination" rather than actionable wildfire or adaptation plans (Vol. 1, Sections 3.9-3.10). This failure to address known toxic hazards and key environmental risks violates Hawai'i legal standards and public trust obligations.

Disregard for Culture, Ecosystems, and Accountability The FEIS lacks updated archaeological surveys and fails to document or protect cultural resources, including iwi kupuna. Cultural monitors have reported barriers to access and contamination of areas where traditional practices occur. The document omits hundreds of pages of cultural impact analysis that had previously been available. Additionally, the Army continues training in endangered species habitats without securing proper permits or outlining effective mitigation. It continues to downplay cumulative cultural, ecological, and health harms while presenting no meaningful plan for accountability or restoration.

Failure to Consider Alternatives The FEIS does not adequately consider alternatives such as transitioning lands to civilian, cultural, or conservation use. It prioritizes the Army's continued control and fails to explore land restoration, demilitarization, or public access options seriously. This violates the purpose of an environmental review and disregards public trust principles.

Conclusion This FEIS is not a genuine assessment-it is a justification for the continued occupation and degradation of Hawaiian lands. Accepting it would set a dangerous precedent that environmental law, cultural protections, and public input can be ignored.

I urge you to vote NO and reject this FEIS for its failure to:

- Address toxic contamination (PFAS, UXO, other munitions).
- Implement and commit to meaningful cleanup and remediation.
- Protect cultural and ecological resources.
- Analyze and mitigate climate vulnerability and wildfire risks.
- Consider alternative land uses in good faith.

This land must be protected for future generations of Hawai'i.

Heidi Waiamau M.Ed.



Waikahekahea, Puna, Hawai'i

## References

Department of the Army. (2025, May 23). Final Environmental Impact Statement for Army Training Land Retention on Oʻahu (Vol. 1 of 4). Hawai'i Department of Business, Economic Development & Tourism. Retrieved from [https://files.hawaii.gov/dbedt/erp/Doc\\_Library/2025-05-23-OA-FEIS-Army-Training-Land-Retention-on-Oahu-Vol-1-of-4.pdf](https://files.hawaii.gov/dbedt/erp/Doc_Library/2025-05-23-OA-FEIS-Army-Training-Land-Retention-on-Oahu-Vol-1-of-4.pdf)

- UXO hazards and no cleanup plan - Vol. 1, Site Conditions & Hazards
- PFAS detection and lack of site-specific testing - Vol. 1, Section 3.9
- Unfulfilled Phase II sampling commitments - Vol. 1, Section 3.9
- Wildfire and climate adaptation deferred - Vol. 1, Sections 3.9-3.10

**From:** [Mira Walker](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT FEIS  
**Date:** Thursday, June 26, 2025 10:26:14 AM

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I'll know the document is not protecting Hawii. REJECT. FEIS  
Sent from iPhone

**From:** [Dawn Webster](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] PLEASE REJECT THE WOEFULLY INADEQUATE FEIS FROM THE MILITARY  
**Date:** Thursday, June 26, 2025 9:57:49 AM

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BLNR should reject the U.S. Army's Final Environmental Impact Statement (FEIS) for the Mākua Military Reservation, Kahuku Training Area, and Poamoho.

DLNR's own staff have found the report to be terribly shoddy and further indication of the military's continuing disrespectful treatment of Hawaiian lands.

We have had a litany of empty promises and repeated betrayals.

It's time to say "ENOUGH!"

Please reject the FEIS and demonstrate that BLNR will not tolerate the military's irresponsible handling of precious land. BLNR can be the bulwark of protection it was designed to be.

Mahalo.

*Dawn Morais Webster Ph.D.*  
*Communications & Issue Advocacy*  
*1, Keahole Place, #3501, Honolulu, HI 96825*  
[www.dawnmorais.com](http://www.dawnmorais.com)  
*808-383-7581*

Aloha Land Board Members:

I am writing as a member of Jewish Voices for Peace in Hawai'i (JVP - Hawai'i) to express my strong opposition to the U.S. Army's proposed retention of leased lands at Kahuku Training Area, Kawailoa-Poamoho Training Area, and Mākua Military Reservation, and to urge the land board to reject the Army's EIS.

As an organization, we have been looking into these land leases for some time and believe that the FEIS falls incredibly short in its goals of assessing the environmental and cultural impacts of the army land retention.

One of our primary concerns as an organization has been the credible reports of the use of white phosphorus on army sites in O'ahu. The FEIS is incredibly vague on the specific kinds of smoke and pyrotechnic charges that are used during their proposed maneuver training. Despite the report proclaiming that white phosphorus is prohibited, we at the JVP are disheartened by the complete lack of transparency accompanied by anecdotal reports of ongoing use from our partners.

As white phosphorous continues to be used in the ongoing genocide in Palestine, it is more important than ever to ensure that this 'āina is not used as a testing grounds for the same chemicals being sent by the United States to Israel. We call for rejection of any EIS that does not explicitly include an independent non-army investigation into the training activities used on army-retained lands.

Beyond the use of white phosphorus, we reiterate the calls of the many Kānaka Maoli and other allies like ourselves who note the sacred nature of these wahi pana. The BLNR has a constitutional duty to mālama 'āina. We believe that this includes asserting their sovereignty to demand transparency and accountability on these illegally-occupied lands. Further, we echo the OHA's concerns about the inappropriate procedure for collecting cultural impact survey information and the army's failure to listen to people of Hawai'i and especially those who have traditionally cared for the three leased lands in question.

It is a simple step, but a vital one, to reject this FEIS which through cliché and dishonest environmental and cultural platitudes fails to truly engage with the question of what retention truly means on this occupied land. We hope that rejection of this FEIS brings us one step closer to a free and sovereign Hawai'i and a free and sovereign Palestine.

Sincerely,

Alec Weiker

Member of JVP - Hawai'i

**From:** [Larry Wentzel](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] reject the US Army FEIS  
**Date:** Thursday, June 26, 2025 8:56:51 AM

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Please reject the United States Army's Final Environment Impact Statement (FEIS). The U.S. Army gained the land for \$1 for 65-year lease, which ends in 2029. It's my understanding that three areas they wish to renew are the Kahuku Training Area (1,170 acres), the Kawaihoa-Poamoho (4,370 acres), and the Mākuā Military Reservation (782 acres). The lands on which those facilities were built have sacred burial sites, cultural sites, endangered species habitat, and critical water sources for the island.

The state is still recovering from the fires that tore through Honolulu and ousted long-time native Hawaiians from their homes, now to be usurped by real estate groups from the mainland. Even Mark Zuckerberg of Meta owns way too much land on the state, to no benefit of the native population. The current US Army sites are without a doubt polluted from chemicals and munitions, causing suffering environmental damage and desecration of sacred lands.

If the US Army wants to continue their use of these areas - which I would deny - then their Environmental Impact Statement must provide full archaeological and cultural surveys, full biodiversity analysis, and cultural consultation. They should also offer alternatives to the 65-year lease, such as shorter-term leases or scaled back usage of the land. Ideally, the land should be restored by the federal government and returned to the people of Hawai'i.

This isn't 1965 anymore, where the belligerent United States imperial forces dish out white supremacy without a care. It's 2025, they should be working with the state to identify what was there before them and honor it. If the Klamath River dams can be removed and the waterway restored to the Yurok, Karuk, and Klamath tribes, Hawai'i can expect the same for their lands. If the US Army fails to meet these standards in full and to the satisfaction of the people of Hawai'i, then their lease should be allowed to fail and they be forced to relocate.

Thank you!

--Larry Wentzel

**From:** [John Wert](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] US Gov't EIS  
**Date:** Thursday, June 26, 2025 6:31:41 AM

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Aloha,

I am imploring you, BLNR, to not approve the Army's final EIS. Overall the military has shown an almost total disregard for the care of the 'aina. Red Hill comes to mind. Also the military not very willing to accept responsibility for their actions. Again Red Hill comes to mind. These are just a few reasons that BLNR should approve/accept the Army's final EIS.

Prof John C Wert (Ret)

Wailuku, HI



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**From:** [Caroline Wissmann](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony on Agenda Item D-1  
**Date:** Thursday, June 26, 2025 9:53:26 AM

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

*My name is Caroline Wissmann of Moku O Keawe 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,*

*Caroline Wissmann*

**From:** [Faith Wong](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Protect Kahuku  
**Date:** Thursday, June 26, 2025 10:09:40 AM

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Aloha, My name is Faith and I have been a member of the dirtbike community for 2 years.

As you are aware, the Kahuku Dirtbike Park, situated within the KTA training area, is the only legal public place for people to ride on Oahu, with limited hours of operation on weekends and national holidays. However, the park is closed during Army training missions, resulting in several months of closures per year and leaving over 5,000 riders without a legal place to ride. I am concerned that if KTA becomes the primary training area, it will lead to more closures or potentially permanent closure of the park. In this scenario, our riders will be forced to use trails not designated for dirtbikes. On behalf of our dirtbike community, I urge the board to consider this issue and establish safeguards to ensure the Kahuku Dirtbike Park remains open and accessible, with limited Army closures.

Sent from my iPhone



**From:** [Gregory M. Wood](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Testimony for Kahuku Dirt Bike Park  
**Date:** Thursday, June 26, 2025 8:19:34 AM

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Dear BLNR and whom it may concern,

I am a current member of the HMA at Kahuku motocross Park. I have been a weekly rider for over 15 years with a connection dating back to my childhood. Me and my family have enjoyed having this legal riding area available to us through the years, making lasting memories, and teaching my children safe and responsible riding, and strong appreciation for the outdoors.

It is very much a concern that this may become the only training area for the military. The military often closes the park several months at a time for training, leaving behind trash like MREs and dangerous materials such as razor wire and spent casings.

I am very concerned further military involvement will leave thousands of riders without a legal place to ride. We strongly urge the BLNR to not let this happen. The Hawaii Dirtbike community is a strong, family oriented and well connected group of people numbering in the thousands if not more who support local businesses and dirt bike merchants and enthusiasts. We hope to have your support and consideration.

Aloha, Greg.

Greg M. Wood  
Ph. 808-721-2488  
[gwood@mwgroup.com](mailto:gwood@mwgroup.com)

**From:** [Christian Yogi](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Kahuku Motocross Park  
**Date:** Thursday, June 26, 2025 6:28:45 AM

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Aloha,

My name is Christian and I have been a member of the dirtbike community for nearly 20 years. Kahuku is the only legal place for dirt bikers to enjoy their hobby. Without it, the amount of illegal dirt bike activity would increase drastically. Kahuku is a considered a home to many. Don't take it away.

June 26, 2025

**Testimony for BLNR meeting on June 27, 2025**

*Agenda Item D1: LAND DIVISION — Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, Island of O‘ahu*

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

I am an O‘ahu resident and have had the privilege of growing up in Hawai‘i where one of the most important values and ways of life is **mālama ‘āina**—to care for, preserve, protect that which feeds us (whether physically or spiritually). My faith calls me to pursue “peace, justice, and the renewal of all creation.” For these simple reasons, I must strongly oppose the U.S. Army’s proposed retention of leased lands at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation, and I urge this board to **reject the Army’s Final Environmental Impact Statement (FEIS)**.

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 do not believe that any Environmental Impact Statement could ever be sufficient to ethically permit the use of sacred spaces for war training. The military controls about 25% of O‘ahu alone and occupies 5.6% of all the Hawaiian islands, the highest proportion of any U.S. state. The fact that Hawai‘i is strategically positioned for the military cannot be of greater importance than the fact that we live on small islands with intricate ecosystems in the middle of the ocean. What might be good for U.S. security is not necessarily good for Hawai‘i security. We’ve already seen the harm of military occupation on the environment, people, and social fabric over the last 60+ years.

More than just a piece of land, these places 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. The Army has not demonstrated the capacity nor will to serve as a proper steward of these places.

We must ensure proper stewardship of our life source and reject, at every step, the use of our home as a training area for war and testing grounds for weapons that inflict terror abroad after imposing damage here. Military training activities of this scale are simply not compatible with conservation, cultural integrity, or **aloha ‘āina**. Enough is enough. We must not repeat history.

After generations of desecration, we have a real opportunity for healing—not only of these sacred lands, but also people—and **this land board is the key**. While your decision today is about the FEIS and not necessarily to answer the question of whether the military should have the land in question, the acceptance or rejection of the FEIS will determine what comes next. Your decision will impact generations to come and can forge a path toward restoration and write a better chapter following decades of destruction, or not. You have been put in these positions for such a time as this and I trust that you will fulfill your kuleana to protect Hawai‘i and its people.

Please use your position and the full extent of your power and authority to reject the Army’s Final Environmental Impact Statement for Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation. This is the only option which will truly respect the land, the culture, and the people of Hawai‘i. It’s time to return these lands to Kānaka Maoli who we know can and intend to live in harmony with ‘āina.

Mahalo nui,  
Kristen Young  
Honolulu, Hawai‘i 96813



**From:** [laura ziegler](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Re: US Army's FEIP for proposed land retention at KTA, Poamoho, and MMR  
**Date:** Thursday, June 26, 2025 2:46:54 AM

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To: Members, Board of Land & Natural Resources

I'm commenting in opposition the US Army's proposal to renew its lease of 6,322 acres of land at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation. I ask the Board to reject the Army's Final Environmental Impact Statement [FEIP], which inadequately addresses the impact of long term military use (including live-fire exercises and heavy machinery) on O'ahu's ecosystem, native culture and heritage, and public health. It reflects the Army's failure to effectively engage with local stakeholders in drafting the FEIP.

The areas currently occupied by the Army contain sacred burial sites and critical habitats for endangered species. The degrading of these ancestral lands through air and noise pollution and the disrespect for traditional culture should end when the current lease expires.

I'm writing from Vermont, but destructive actions by the US Army implicate all Americans. Thank you for considering my views.

Yours truly,

Laura Ziegler