

From: [Thomas Clemens](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Public commentary on the FEIS
Date: Thursday, June 26, 2025 4:35:44 PM

Hello,

I am testifying as an individual resident living in Honolulu, and after reading the DLNR's staff submittal, I am writing to recommend that the FEIS be rejected.

The information submitted was inadequate and seems like it was intentionally misleading/erroneous. These choices continue a pattern of behavior that continuously disenfranchises the hawaiian people and prioritizes the rights and beliefs of the US government over the health and safety of the natural world and the people that live in it here in hawaii.

Thank you and please reject!

Thomas Clemens
(He/him/his)

From: [Pi'ilani Schneider](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Mahalo for considering rejecting the US Army's FEIS
Date: Thursday, June 26, 2025 11:50:00 AM

Aloha Mai

I reject the US Army's FEIS

The bombing and AR sounds from the valley of Poamoho is deafening.

The rattling of my hale from the low flying helicopters directly over my hale is absurd.

Mahalo piha for ending this illegal occupation of our sacred aina.

The US Army must clean up their opala as well.

Mahalo

Pi'ilani

Testimony of William Tovey South
Before the Board of Land and Natural Resources
Regarding the Final Environmental Impact Statement
(FEIS)

Submitted: 06/26/2025

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

As someone who has witnessed the contamination of
O‘ahu’s sole source aquifer—once a pristine and vital
resource—I am writing to express my strong opposition to
the Final Environmental Impact Statement (FEIS)
currently before you.

The Navy’s long-standing mismanagement at the Red Hill
Bulk Fuel Storage Facility has caused irreparable harm to
our water supply and to the health and well-being of
thousands of residents. The tragic consequences of that
contamination are a sobering reminder of what is at stake
when our aquifers are put at risk.

I am particularly concerned by the comments submitted
by the Commission on Water Resource Management
(CWRM), which acknowledged previous military impacts
to groundwater—including from the Red Hill Fuel

Facility and Army training areas in Waiawa—and urged that the FEIS include detailed information about potential sources of contamination. This request was not met. The omission of this information undermines the credibility and completeness of the environmental review process.

We have learned—painfully—that once an aquifer is contaminated, recovery can take decades, or may never be fully achieved. The Navy failed to protect our water. We must not let the Army follow the same path.

I respectfully urge the Board to uphold the requirements of Hawai‘i’s environmental review laws and reject this inadequate FEIS. The health of our communities and the protection of our freshwater resources must come first.

Mahalo for your time and thoughtful consideration of my testimony.

Sincerely,

William Tovey South

47-657 Hui Ulili Street

Kaneohe, HI. 96744

From: [Kumella Aiu](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] EIS
Date: Thursday, June 26, 2025 11:53:47 AM

Aloha Land Board Members:

As a young child growing up here I was lead to believe and proudly claim that I lived in the 50th state. The aloha state. That Hawai'i had been bombed by Japan as part of war against the US.

As a child of immigrants (both parents having been impacted by war) my parents taught me to question things, to read both sides of the argument and be true to myself and my values.

As an adult I've learned there is more to that story of US patriotism. There is a darker side to America. One we don't want kids to know. Because if we told them the truth they would see the hypocrisy in our words and actions.

I don't know about you, but it feels like we are on the brink of more war. And we are sitting with a target on our backs. I don't feel safer with the military here.

I have watched our dreams of better transportation be ruined with the mishandling of the rail, I've seen affordable housing used to line the pockets of developers, I've seen mountains destroyed in the name of science. And I'm worried I will see our land freely given in the name of safety.

The military has not been good stewards, and in fact lie and hide things at every turn. This EIS is one more example of giving Hawai'i the short end of the stick. Here are just a few examples of how it falls short.

- 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

So I am asking you to reject the EIS and end military leases. I'm asking you to hear the local community when we say enough is enough.

Mahalo,

Kumella Aia

Honolulu, Oahu

From: [Rayden Akau](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL]
Date: Thursday, June 26, 2025 2:50:37 PM

Aloha,

My name is Rayden Akau. 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 will stop flowing, the trees will stop fruiting, and the soul becomes rotten to the core.

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 have been gone within and throughout 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, rather the entire community.

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,
From a proud Native Hawaiian,
Rayden Akau

From: [Andrew Alling](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Thursday, June 26, 2025 11:16:22 AM
Attachments: [PastedGraphic-1.png](#)
[PastedGraphic-2.png](#)
[PastedGraphic-3.png](#)

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

*****To summarize in laymen's terms****

Current military UXO detection technology has proven to be INEFFECTIVE in Hawaii, and must be redeveloped and reevaluated by the State before any live-fire training can continue.

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

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

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

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

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

For the State, before any lease is renewed, consider this: Who truly benefits from it? Currently

after military training is over, UXO detection and removal are done by out-of-state contractors, flown in at extremely high cost, with expensive equipment that needs to be **rented** for millions of dollars. The people of Hawai‘i—those who live here, who care for this land—are left out. That must change.

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



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

Color codes:

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

4.3.7 Waikoloa, HI

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

From: imani.altemus-williams
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] U.S. Army's proposed retention of leased lands testimony
Date: Thursday, June 26, 2025 11:41:07 AM

Aloha Land Board Members:

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

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

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,
Imani Altemus-Williams

From: [Tsuyuno Amos](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Agenda Item D-1
Date: Thursday, June 26, 2025 4:28:23 PM

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

As someone who has witnessed the contamination of O'ahu's once-pure sole source aquifer due to the Navy's decades-long disregard for the precious wai underlying its 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 groundwater (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 our 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.
Chloe Amos

From: [De Austin](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Thursday, June 26, 2025 2:24:49 PM

Honorable members and Chair of the BLNR,

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

Their data is old, and may no longer be relevant to today's concerns.

Their lack of surveys for the protection of invaluable cultural resources is highly concerning.

The continued ABUSE of our 'aina for the US military is unconscionable and morally bankrupt. The thousands of acres subjected to the decades of bombings, live firings, etc. have damaged environmental and cultural resources across the archipelago.

The Red Hill water fiasco, which continues to be a seeping sore in Hawai'i, had multiple points of disregard in its checkered history, and make an absolute cartoon mockery of the lack of concern for the precious water sources in Hawai'i, and for the people who rely on those sources. Red Hill has become a symbol of the abuse of power and colonialistic attitudes.

The US military does not need to live bomb and destroy these lands to improve their military prowess. I reject the idea that in order to support the military we, Hawai'i residents and kanaka, must allow this to happen.

Hawai'i needs to return itself to being a whole nation, and not an incubator for war.

We support the military already by proving a base, housing on base, and through our federal taxes. Do we seriously have to provide war practice areas? Why do people think that islands are the perfect place to test bombs or air raids? What about the Marshall islands, the Micronesian islands, the atomic bombing in the Pacific to test out the effects of nuclear radiation? Do we choose these places, our islands, because no one says anything?

Well, I for one, and hopefully not alone, am saying something back.

A'ole!

Respectfully,

D. Austin
Kihei, Maui

805-509-1362

From: [Patrick John Aznar](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Kahuku Motocross park testimony
Date: Thursday, June 26, 2025 12:03:47 PM

Hi my name is Patrick John Aznar
And I've been a member of HMA since 2003.
Sent from my iPhone

Dane Calvin
99-969 Aiea Heights Drive
Aiea, HI 96701
dane.calvan@live.com
808-258-3550
26 January 2025

Chair Dawn Chang and Members
Board of Land and Natural Resources
Department of Land and Natural Resources
1151 Punchbowl Street
Honolulu, HI 96813

Subject: Support for the Final Environmental Impact Statement (EIS) for Army Training Land Retention on O'ahu

Dear Chair Chang and Members of the Board,

I am reaching out to convey my strong endorsement of the Final Environmental Impact Statement (EIS) regarding the U.S. Army's plan to retain key training lands on O'ahu, including the Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation.

The importance of these training sites cannot be overstated. They are vital to maintaining the readiness and effectiveness of our military forces. The varied landscape and climate of O'ahu provide an ideal setting for realistic training scenarios, preparing personnel for a broad spectrum of missions — from humanitarian efforts to combat operations. Additionally, these areas facilitate joint exercises with allied nations and partners across the Indo-Pacific, bolstering regional security and interoperability in an increasingly complex geopolitical landscape.

The Army's dedication to environmental and cultural stewardship is evident through their ongoing initiatives. Through programs like the O'ahu Army Natural Resources Program (OANRP), they have:

- Successfully propagated and replanted endangered native species such as the Ka'ala loulu (*Pritchardia kaalae*), endemic to the Wai'anae Mountains. This includes measures like fencing to protect against invasive animals, rat control to safeguard seeds, and nursery propagation to reintroduce these plants into their natural habitat.
- Managed nurseries at Schofield Barracks that nurture thousands of endangered plants for restoration projects, helping to preserve Hawai'i's unique biodiversity.
- Conducted archaeological surveys and worked to protect cultural sites, including burial grounds, while collaborating with Native Hawaiian cultural practitioners to ensure respectful preservation.
- Invested over \$12 million annually in natural and cultural resource programs, supporting seed labs, greenhouses, and community outreach efforts to educate and involve local populations.

These efforts exemplify a profound respect for the 'āina and the cultural legacy of Hawai'i, demonstrating that military activities can coexist with conservation and cultural preservation.

Furthermore, the strategic significance of these lands extends beyond training. They serve as crucial venues for multinational military exercises, fostering cooperation among allies and enhancing the capabilities of U.S. forces. Maintaining access to these areas ensures that we can continue to develop combat-ready units and uphold regional stability.

In closing, I respectfully urge the Board to endorse the Final EIS. The continued use of these lands by the Army is essential for national security, aligns with responsible environmental management, and supports regional peace and stability.

Thank you for considering my perspective.
Dane Calvin

From: [Will Caron](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject U.S. Army FEIS for Mākua Military Reservation, Kahuku Training Area, Poamoho
Date: Thursday, June 26, 2025 12:37:43 PM

Dear Board of Land and Natural Resources,

I respectfully request that you reject the Army FEIS for Mākua Military Reservation, Kahuku Training Area, Poamoho. It has many if the same problems and omissions that the Army's recently-rejected FEIS for Pōhakuloa and must be rejected as well.

Mahalo,

--

Will Caron
Community Organizer
Kahalu‘u, O‘ahu
8083874920

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 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,

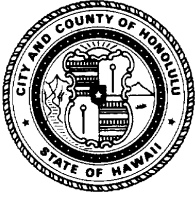
Ruth Leinani Coules

Honolulu, Oahu

Hui Aloha 'Āina o Honolulu

ruthcoules@gmail.com

808.260.9064



HONOLULU CITY COUNCIL

KE KANIHELA O KE KALANA O HONOLULU

530 S. KING ST. STE. 202, HONOLULU, HI 96813

ANDRIA TUPOLA
HONOLULU CITY COUNCIL
DISTRICT I
TELEPHONE: (808) 768-5001
FAX: (808) 768-1217
EMAIL: atupola@honolulu.gov

June 25, 2025

Mrs. Dawn N.S. Chang
Board of Land and Natural Resources
DLNR Boardroom, Kalanimoku Building
1151 Punchbowl Street, 1st Floor
Honolulu, HI 96813

Subject: Agenda Item D1 – Final EIS for Army Training Land Retention

Dear Chairperson Chang and Members of the Board,

Thank you for the opportunity to testify on Agenda Item D1. I respectfully urge the Board to **decline acceptance of the Final Environmental Impact Statement (EIS)** and to **not renew the lease** for the Mākua Military Reservation. Instead, I recommend we move toward **formalizing a co-management model** and now is the time to define clear legal terms that support this collaborative framework moving forward.

Organizations like Mālama Mākua have facilitated over 100 cultural access visits, reconnecting families with sacred sites and traditional practices. Please consider the long-standing community call for access, accountability, and shared responsibility. Mahalo for your thoughtful consideration.

Respectfully,

A handwritten signature in black ink, reading "A. Tupola". The signature is written in a cursive style with a large, stylized "A" and "T".

Andria Tupola, Ph.D.
Honolulu City Councilmember

From: [Sierra Dew](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the FEIS
Date: Thursday, June 26, 2025 11:24:28 AM

Aoha,

I am writing to ask the BLNR to reject the Army's FEIS. I support the points made in the DLNR Staff Submittal on item D1 and the Staff recommendation to reject the FEIS.

The army and military have had a long history of desecrating Hawai'i's lands and waters and cannot be trusted. As someone who supports the health and well being of Hawai'i's most vulnerable communities I urge you to consider rejecting the FEIS.

Mahalo nui,
Sierra

--

Sierra Dew | Director | Wisdom Circles Oceania
(she/hers)

"Our creative expression is key to rebuilding healthy communities"
sierra@wisdomcircles.org | 808-283-3078 | www.wisdomcircles.org

From: [Alyce Dodge](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] re: Item D-1 FEIS
Date: Thursday, June 26, 2025 11:50:50 AM

Aloha,

I am writing regarding 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 strongly support the Department of Land and Natural Resources’ staff’s recommendation on Item D1 to reject the FEIS.

Mahalo,

Alyce Dodge

From: [Ben Grief](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the U.S. Army's Final Environmental Impact Statement (FEIS)
Date: Thursday, June 26, 2025 11:24:38 AM

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: [Konia Freitas](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-1
Date: Thursday, June 26, 2025 1:08:10 PM

Dear Board of Land and Natural Resources,

I write to ask the BLNR to hold the Army accountable to the law and **REJECT the flawed FEIS.**

Your own LD staff have valid concerns with the FEIS because it does not fully declare the environmental impacts, and it does not thoroughly discuss reasonably foreseeable consequences (DLNR, Executive Summary, 6/27/25, p. 4).

In Hawaii, the US military presence is vast. For decades, bombing, live fire exercises, and military training exercises have damaged thousands of acres of our natural and cultural environments, and rendered irreparable their vital ecological functions.

Considering the military's failure to clean up the mess they left on Kaho'olawe, and their most damaging, polluting act— contaminating (and covering up) Oahu's largest drinking water supply from their Red Hill underground fuel storage facility, the BLNR has a responsibility to hold the military accountable.

The **public trust doctrine requires the BLNR to exercise due diligence and prudence in managing our natural and cultural resources.** The BLNR's core responsibility is to protect the interests of the present *and* future generations of beneficiaries of that trust. You have been presented with valid and reliable information from qualified LD staff. Act decisively, **reject the FEIS.**

Sincerely,
Antoinette Freitas, PhD
Halawauka, Ewa, Oahu
Email: konia808@gmail.com

[Konia Freitas](#)
Email: konia808@gmail.com

From: [page.gathings](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] kahuku riding area
Date: Thursday, June 26, 2025 10:54:29 AM

Aloha, My name is Page Gathings 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 Army closures.

Please keep our community riding area open for Hawaii families and Kids to learn valuable skills that keep families together and off drugs.

The last few years our riding area is closed for weeks at a time with no legal alternative to go to for riding recreation and family fun. Kids that are raised going here develop good community bonds and valuable skills that keep kids clean from drugs while teaching skills that later help them to navigate life in a positive light that cherish life in our community.

Thank you very much, Page Gathings member number # 220

From: [Chey](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Thursday, June 26, 2025 1:20:10 PM

My name is Shane George, and I am a resident of Austin, Texas but served and resided in 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,^[1]_[SEP] Shane George.
Austin Texas, formerly in O'ahu.

Please listen to veteran voices & Native peoples.

From: [Michael Gregg](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] The army's final EIS for Makua, Kahuku, and Poamoho
Date: Thursday, June 26, 2025 1:41:28 PM

Aloha Board Members,

I recommend rejecting the final EIS because it does include a plan to identify all significant historic, archeological, and Hawaiian heritage resources before undertaking more federally funded destructive activities that could damage or destroy them.

**Mahalo,
Michael Gregg
73-4434 Aniani St
Kailua-Kona HI**

From: [Bryce Groark](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Thursday, June 26, 2025 1:28:51 PM

Aloha from Kona.

I am requesting that BLNR reject the flawed FEIS presented by the US Army for the Mākua Military Reservation, Kahuku Training Area, and Poamoho. We must refuse expansion at Barking Sands and stop the bombing of Ka'ula Island.

PLEASE do the right thing and REJECT THIS!

Mahalo
Bryce Groark
Living Ocean Productions

From: [Alan S. Hayashi](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony in support of military use of Oahu lands for training.
Date: Thursday, June 26, 2025 1:44:24 PM

To: The Board of Land and Natural Resources:

Madam Chair and members of the Board, my name is Alan Hayashi, a resident of Hawai'i, and veteran (served with the 25th Inf Division and Hawai'i Training Center, Infantry).

If Hawaii's men and women are ordered into conflict, we all want them properly trained and ready for the fight. Unless proper training facilities are available they will not be combat ready....the more training under combat situations the better, so proximity to and proper trading areas is important.

I support the responsible use, and clean up, of the various training lands identified by the Military commanders as critical to their mission. Thank you for the opportunity to comment. All best wishes! V/R Alan Hayashi.
Sent from my iPhone

From: [Richard Rothschiller](#)
To: [DLNR.BLNR.Testimony](#)
Cc: [HICHRP](#)
Subject: [EXTERNAL] Testimony on BLNR decision on the Army Oahu Lease FEIS Agenda item D-1
Date: Thursday, June 26, 2025 1:28:32 PM

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

My name is Richard Rothschiller and I am submitting this testimony on behalf of the Hawai'i Committee for Human Rights in the Philippines (HICHRP), of which I am Co-Chairperson, to the BLNR regarding the Army's FEIS for O'ahu land leases. HICHRP is a Hawaii-based group of individuals concerned about the human rights situation in the Philippines and committed to working for a lasting peace based on justice in the Philippines. It is a member-organization of the International Coalition for Human Rights in the Philippines, a global solidarity movement for human rights in the Philippines. We also recognize that integral to HiCHRP's human rights work is making connections and working in solidarity with the local struggles of the peoples of Hawaii people for demilitarization and decolonization, and indigenous peoples' rights, migrants' rights, land and water rights, among others.

The Hawai'i Committee for Human Rights in the Philippines strongly urges you to REJECT this legally deficient Final Environmental Impact Statement (FEIS) for the Army's retention of lands on O'ahu.

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

The history of the US military in both Hawai'i and the Philippines is long-standing, well-documented, and has proven to be socially, culturally and environmentally destructive. The bases take up farm land and Indigenous People's ancestral domains and leave toxic waste and unexploded ordinance on these lands. Additionally, the US military exploits local women, with cases of violence and murder and the legacy of abandoned children in both Hawai'i and the Philippines. Most importantly, the presence of US military installations and troops is an impediment to the restoration of

the Kanaka Maoli right to self-determination.

Please consider our specific concerns with the FEIS, below:

The Army is not above the law. The shoddiness of this FEIS and the disregard of clear, repeated guidance from the community and the DLNR itself can only be interpreted to mean the Army thinks its political clout can override state laws. This includes its repeated refusal to describe in the FEIS how it will comply with our conservation district and forest reserve laws, which do not provide for military training, as well as the FEIS' broader failures to meet the high standards of our environmental impact statement law itself. The BLNR must not allow this to happen, and must hold the Army accountable to the clear standards under our environmental review law, as well as for our conservation district and forest reserve lands.

This FEIS disregards constitutionally protected Native Hawaiian rights. As the staff submittal makes clear, the FEIS lacks sufficient information for the BLNR to conduct a "Ka Pa'akai analysis" of impacts to constitutionally protected Native Hawaiian traditional and customary practices. Without such information, the BLNR may not be able to uphold its constitutional obligations under Art. XII Sec. 7 of the Hawai'i constitution, resulting in the continued violation of Native Hawaiian rights.

The FEIS shows no regard for Native Hawaiian self-determination. The lands at issue were stolen at literal gunpoint from the Native Hawaiian people, after the Overthrow of the Hawaiian Kingdom by U.S. Marines and a handful of insurrectionists. Yet the Army has refused to meaningfully consult on the disposition of these stolen 'āina with the Office of Hawaiian Affairs, established under law to advocate for Native Hawaiians, or to even consult in a timely manner with the 'Aha Moku Advisory Council, to represent Native Hawaiian cultural interests and expertise. The Army's refusal to meaningfully consult with these modest Ōiwi-led and -focused government entities has not only resulted in a faulty and uninformed FEIS, but demonstrates a clear disrespect for Native Hawaiian self-determination as a whole. The BLNR must reject this FEIS and send a message to the Army: Native Hawaiian rights to self-determination must be respected.

The Army has repeatedly failed to properly consult kūpuna and conduct surveys of historic and cultural resources, despite the urging of the state historic preservation division and other DLNR staff. Only approximately 19% of the land at issue was subjected to an archeological survey. We therefore have no way to assess potential impacts to unidentified archaeological and cultural sites - including those mentioned in Native Hawaiian traditions - that are potentially 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 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.

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 information regarding the contamination of our water supply from its proposed actions, and is making no real commitment to remediate the lands and waters it has contaminated with toxic chemicals and unexploded ordinance notwithstanding the treats to public and environmental health. This is unacceptable and the FEIS should NOT be accepted.

The Department of Defense is again neglecting and threatening our precious wai.

As highlighted by the disastrous Red Hill Fuel Tank fuel 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 life-giving wai. This deficient FEIS lacks requested data as to how past and future military activities may contaminate ground water. Oil leaks from vehicles, lead and heavy metals, PFAS, and 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 refuse to accept an FEIS that does not provide a full accounting of potential threats to our precious wai - before our history of water contamination repeats itself yet again

The Army has not truly committed to relinquishing the lands in Mākua and Poamoho.

If the Army really wanted to relinquish these lands, it would have not included the possibility of retaining these lands in the EIS. As written - and if accepted - the Army could still decide to retain these lands. The Army isn't even committing to a plan to clean up these lands beyond the generic, decades-long CERCLA process even if it does choose to relinquish

these lands. This is not a good faith commitment to relinquish these lands.

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

Mahalo nui for your consideration of this testimony.

Richard Rothschiller, Psy.D., on behalf of the Hawai'i Committee for Human Rights in
the Philippines
808-277-9159

From: [Akela Himalaya](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] All too much
Date: Thursday, June 26, 2025 11:49:53 AM

Aloha,

My name is Akela Himalaya, 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,
Akela Himalaya

From: [cheryl ho](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda item D-11, re: Army's EIS
Date: Thursday, June 26, 2025 2:55:06 PM

To the DLNR:

As a resident of Honolulu, with concerns for mālama ‘āina throughout the island chain, I respectfully urge:

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

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

Please hold the U.S. Navy accountable for its failures in the past, and for providing careful, honest assessment of its impact on our lands.

Sincerely
Cheryl O. Ho, Nu‘uanu

Hi’ipoi Ho
hiipoikealoha@gmail.com

From: judie@aloha.net
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject Agenda item D-1
Date: Thursday, June 26, 2025 12:19:51 PM

Aloha,

I strongly urge you to reject the EIS . Thanks for your consideration.

Aloha,

Judie Hoeppe

From: [Georgia Hoopes](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's EIS
Date: Thursday, June 26, 2025 11:41:29 AM

Aloha Land Board Members:

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

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

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,
Georgia Hoopes
Kalaheo

Mahalo for taking action!

From: [Natasha HopkinsMoniz](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] In regards to Kahuku Dirtbike Park
Date: Thursday, June 26, 2025 11:48:47 AM

To BLNR

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.

The aina is for locals! Not the military. They have sooooo much more land in the Mainland they can use. Leave our island alone and stop letting the military destroy it. Kahuku dirtbike park is a place for the community and should be a higher priority than the mainland. There's enough desert and land for them elsewhere! Not on a small island.

Represent your people! Your kamaaina.

Sincerely
Natasha HopkinsMoniz

Sent from my iPhone

From: [Ku Kahakalau](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Strong Objection to Acceptance of Final EIS for the Army Training Land Retention of State Lands at Kahuku TrainingArea, Kawaioloa-Poamoho Training Area, and Makua Military Reservation, Island of O'ahu,
Date: Thursday, June 26, 2025 2:51:03 PM

Please accept our **STRONG OBJECTION TO THE ACCEPTANCE** of the **Final Environmental Impact Statement (EIS) for the Army Training Land Retention of State Lands at Kahuku TrainingArea, Kawaioloa-Poamoho Training Area, and Makua 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. These areas hold cultural and environmental significance not just for native Hawaiians but for many other Hawai'i residents as well. Mahalo. The Kahakalau 'Ohana

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Kū Kahakalau, Ph.D.
CEO, KŪ-A-KANAKA LLC
P. O. Box 431
Hilo, Hawai'i 96721
(808) 937-6854

Kū-A-Kanaka!
When Natives Thrive Everyone Benefits!

From: [Makana Kaupe](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] I, Makana Kaupe, Reject the U.S. Army Final EIS
Date: Thursday, June 26, 2025 2:36:37 PM

I, Makana Kaupe, do reject the U.S. Army's Final Environmental Impact Statement.

I am proud to be Kanaka Maoli whose kupuna are from Hawai'i. As Co-Founder of POLYROOTS LLC and the PolyRoots Community, we can no longer wait for a future with more desecration and destruction. The time has come to make right the wrongs against our aina and ancestors.

Makana Kaupe
Co-Founder
POLYROOTS

From: [Augustin Kendall](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Army's FEIS
Date: Thursday, June 26, 2025 1:37:23 PM

Hello,

Please reject the Army's FEIS for Kahuku Trainking Area, Kawaihoa-Poamoho, and Mākua Military Reservation.

The lands have sacred burial sites, cultural sites, endangered species habitats and critical water sources.

The Army's use has already caused environmental damage and desecration of sacred lands. And they have failed to conduct full archaeological and cultural surveys of the lands.

The FEIS ignores key alternatives (like shorter lease terms or no military use).

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

Thank you for considering this.

- Augustin Kendall

--

Augustin
(he/him/his)

From: [Leilani Kirby](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Please Reject FEIS
Date: Thursday, June 26, 2025 11:12:33 AM

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

My name is Leilani Carinio I am Hawaiian and daughter of James Carinio, Granddaughter of Elizabeth Manono Paoa Valley

I live in California and yet feel very drawn to my Hawaiian culture. Im missing desperately my direct connection and hoped someday to qualify for Homestead but my 25% Hawaiian quantum not enough. My father sadly doesnt agree to sign up as he qualifies for Homestead being 50% Hawaiian. He now lives in Oklahoma on hospice at 87 years old. It a personal decision for him to not sign on for Homestead. For me its a rupture from the aina my lineage A disconnect. I pule you folks reject military use of the sites under review.

The following are many of my concerns when I do research from hear and witness with eyes wide.open the disrespect and disregard for our beauty and gorgeous resources.

I share 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, necessary land remediation plans, unexploded ordnance and military toxins on the aina

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,
Leilani Carinio Kirby

Mahalo nui for your consideration.

Sincerely,

From: [Shawn L](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Protect Kahuku
Date: Thursday, June 26, 2025 11:40:47 AM

Aloha, My name is Shawn Lapitan 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.



Ka Moku‘āina ‘o Hawai‘i
Ka ‘Oihana Kumuwaiwai ‘Āina
Board of Land and Natural Resources
DLNR Boardroom, Kalanimoku Building, 1151 Punchbowl Street, 1st Floor
Online via Zoom Meeting ID: 867 3731 9705

9:00 AM, June 27, 2025

Via E-mail: <blnr.testimony@hawaii.gov>

Re: 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.

Aloha Chair Dawn Chang and members of the board,

The Prince Kuhio Hawaiian Civic Club strongly opposes the acceptance of the Final Environmental Impact Statement (FEIS) concerning the Army Training Land Retention at the Mākua Military Reservation, Kahuku Training Area, and Kawaihoa-Poamoho. We stand united with the Association of Hawaiian Civic Clubs, fully endorsing Association Resolution NO. 2024-59 and Resolution NO. 2024-58. We urge the Board of Land and Natural Resources (BLNR) to take a decisive stance on the issues related to the U.S. Military leases set to expire in 2029.

We call for the REJECTION of this legally inadequate FEIS for the Army's retention of lands on O‘ahu. Throughout the environmental review process, the Army has consistently overlooked the concerns and comments raised by the Hawai‘i community, including those from your own DLNR staff. Consequently, this document fails to adequately address potential impacts on streams, aquifers, native and endangered species, cultural sites, Native Hawaiian traditional practices, and other vital public trust resources and constitutional rights. We appreciate your staff's recommendation to reject the FEIS due to its insufficiency under the law.

The necessity for a remediation plan is underscored by the Department of Defense's long history of unfulfilled commitments to protect and remediate O‘ahu's ‘āina from toxic contamination. From the Navy’s contamination of 93,000 residents and our sole source aquifer due to multiple Red Hill fuel spills, to the Army Corps' prolonged failure to address toxic contamination beneath

Radford High School, and the Marine Corps' neglect regarding lead contamination around its Pu'uloa firing range, the Department of Defense has repeatedly prioritized its interests over the health and safety of our communities.

Key points of concern regarding the FEIS include:

- The reliance on outdated biological studies, lacking a current and comprehensive baseline of data on native and endangered species. This deficiency severely hampers the ability to assess potential environmental impacts, risking irreversible harm to species such as the 'ua'u, 'a'o, pueo, 'i'iwi, and 'ope'ape'a. This alone warrants rejection of the FEIS.
- The Army's failure to consult with the 'Aha Moku and key kūpuna, despite explicit instructions from DLNR staff. The Army's belated attempt to engage with the 'Aha Moku after the BLNR's non-acceptance of the Pōhakuloa FEIS does not rectify this oversight, as the meeting occurred after the publication of the FEIS and cannot be considered part of the review process.
- Historical neglect by the military, as evidenced by the Red Hill Fuel Tank leaks and ongoing PFAS contamination, highlights the need for thorough data on how military activities may impact groundwater. The FEIS lacks critical information on potential contamination from oil leaks and unexploded ordnance, necessitating a full assessment of threats to our water resources.
- Accepting this inadequate FEIS would undermine the BLNR's mission, setting a precedent that could allow future applicants to cite this acceptance as justification for their own deficiencies, ultimately jeopardizing our natural and cultural resources.
- The Army's insufficient consultation with kūpuna and lack of comprehensive surveys of historic and cultural resources is concerning. Only about 19% of the land underwent archaeological survey, neglecting potential unidentified sites significant to Native Hawaiian traditions. The omission of traditional stories and practices is disrespectful to Kānaka 'Ōiwi and their ancestral lands.

The public trust doctrine mandates that the BLNR exercise diligence in managing our resources for current and future generations. Without proper cultural surveys, biological assessments, and a genuine evaluation of alternative uses for the long-abused 'āina, the BLNR cannot fulfill its responsibilities.

However, if the BLNR decides to accept the FEIS or renew the lease, we ask that the BLNR write into the lease language that guarantees the Military will do the following and hold them accountable to do so:

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

By accepting such a shoddy FEIS, the BLNR will make it that much harder to carry out its overall mission. Every subsequent applicant required to undergo environmental review before a BLNR action will be able to point to the BLNR's acceptance of this deficient document to excuse their own shortcomings, and future BLNR members may feel pressured to give in to their

demands for deference - at the expense of our natural and cultural resources, and Hawaii's present and future generations.

We 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 the retention of lands it currently leases from the state, at the Mākua Military Reservation, Kahuku Training Area, and Kawaihoa-Poamoho. It's time to return these lands and begin a real process of healing and restoration.

Founded in 1964, the Prince Kuhio Hawaiian Civic Club (PKHCC) was established to promote the education and social welfare of people of Hawaiian ancestry. Its objectives include supporting high ethical standards in business, industry, and professional fields.

PKHCC urges the board to please *reject* the FEIS put forward in Agenda Item D-1.

Mahalo for your attention and consideration.

Me ke aloha,

Norman Llanos
Pelekikena
president@pkhcc.org

From: [Hot Pocket](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to reject the military's FEIS
Date: Thursday, June 26, 2025 3:39:00 PM

To the members of the board, the U.S. Army wishes to retain: Kahuku Training Area (1,170 acres), Kawaihoa-Poamoho (4,370 acres), and Mākua Military Reservation (782 acres). Before they are granted a new lease, they need Hawaii's Board of Land & Natural Resources (BLNR) to accept their Final Environmental Impact Statement (FEIS).

Their current lease began in 1964 and expires in

2029. Urge the BLNR to reject the Army's FEIS because:

- The lands have sacred burial sites, cultural sites, endangered species habitats and critical water sources.
- The Army has failed to conduct full archaeological and cultural surveys of the lands.
- The FEIS ignores key alternatives (like shorter lease terms or no military use).
- The Army's
use
has
already caused
environmental damage and desecration of sacred lands.
- These lands should be restored and returned to Native Hawaiian peoples.

I reject the act of renewing the U.S. Military's lease on Pohakuloa.

Sincerely,
Jean Luke Prentice

From: [Tina Marie](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Thursday, June 26, 2025 12:53:28 PM

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

My name is Tina Marie Even 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,

Tina Marie Even Hawai'i Resident

Mahalo,

From: [Howard McPherson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1 Testimony urging NON-ACCEPTANCE OF draft ARMY EIS
Date: Thursday, June 26, 2025 12:24:42 PM

Dear ladies and gentlemen,

I respectfully urge NON-ACCEPTANCE of the proposed draft army EIS under consideration, for the reasons stated by BLNR Staff Planner Lauren Yasaka and Acting Administrator Ian Hirokawa, as summarized at page 39 of their staff report, dated June 27, 2025, and approved by Dawn N.S, Chang, Chairperson.

Sincerely,
Howard G McPherson
Registered Hawaii voter
65-year O'ahu resident

From: [Alison Miller](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Agenda Item D-1
Date: Thursday, June 26, 2025 11:39:12 AM

To whom it may concern:

I am sending this past today's deadline, but I am asking the BLNR to hold our US Army accountable.

Please reject FEIS.

This is not in the interest of Hawaii residents.

**Thank you,
Alison
Kauai resident**

From: [Jordan Nishina](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Thursday, June 26, 2025 1:22:15 PM

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

My name is Jordan 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,
Jordan

From: [Hot Pocket](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony to reject the military's FEIS
Date: Thursday, June 26, 2025 3:39:00 PM

To the members of the board, the U.S. Army wishes to retain: Kahuku Training Area (1,170 acres), Kawaihoa-Poamoho (4,370 acres), and Mākua Military Reservation (782 acres). Before they are granted a new lease, they need Hawaii's Board of Land & Natural Resources (BLNR) to accept their Final Environmental Impact Statement (FEIS).

Their current lease began in 1964 and expires in

2029. Urge the BLNR to reject the Army's FEIS because:

- The lands have sacred burial sites, cultural sites, endangered species habitats and critical water sources.
- The Army has failed to conduct full archaeological and cultural surveys of the lands.
- The FEIS ignores key alternatives (like shorter lease terms or no military use).
- The Army's
use
has
already caused
environmental damage and desecration of sacred lands.
- These lands should be restored and returned to Native Hawaiian peoples.

I reject the act of renewing the U.S. Military's lease on Pohakuloa.

Sincerely,
Jean Luke Prentice

R.Maui Quizon
95-1074 Hoalia St
Mililani, HI 96789
rmquizon82@gmail.com
(808) 228-0915

June 26, 2025

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

Re: Testimony in Support of the Final Environmental Impact Statement (EIS) – Army Training
Land Retention at Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua
Military Reservation

Dear Chair and Members of the Board:

I respectfully submit this written testimony in strong support of the acceptance of the Final Environmental Impact Statement (EIS) for the Army's proposed training land retention on the island of O'ahu. The areas identified — Kahuku Training Area, Kawaihoa-Poamoho Training Area, and Mākua Military Reservation — are vital for ensuring that our military personnel can continue to train effectively and safely in defense of our nation and the Pacific region.

As a retired Hawaii National Guard veteran and local resident, I recognize the importance of these lands in preparing our service members to respond to natural disasters, humanitarian crises, and national defense missions. Hawai'i's geographic location makes it a critical hub for Indo-Pacific stability, and effective, realistic training is not just beneficial — it is essential.

The Final EIS represents years of community input, cultural and environmental assessments, and an effort to strike a balance between national security and stewardship of our 'āina. I appreciate the Army's commitments made in the EIS to address environmental protection, cultural resource preservation, and community transparency.

I respectfully urge the Board of Land and Natural Resources to accept the Final Environmental Impact Statement and support the continued use of these lands for military training, in accordance with the proposed mitigations and community consultations outlined in the EIS.

Thank you for the opportunity to provide testimony and for your consideration of this critical matter.

Sincerely,

R. Maui Quizon

R. MAUI QUIZON, SMSgt (Retired), Hawaii Air National Guard
Past President, Hawaii National Guard Enlisted Association



HOUSE OF REPRESENTATIVES

Hale o nā Luna Makaʻāinana

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

June 26, 2025

Via email only to blnr.testimony@hawaii.gov

Board of Land and Natural Resources
P. O. Box 621
Honolulu, Hawaii 96809

Meeting of The Board of Land and Natural Resources, June 27, 2025, 9:00 a.m.

RE: Testimony in Opposition to the Final Environmental Impact Statement for Army Training Land Retention at Mākua Military Reservation

Dear Chair and Members of the Board,

I am writing to respectfully submit my formal testimony in strong opposition to the Final Environmental Impact Statement (FEIS) as it relates to the proposed retention of State lands at Mākua Military Reservation (MMR).

The Department of Defense formally ended live-fire training at Mākua in December 2023, following the suspension of such activities since 2004. However, the legacy of training remains. The land is still contaminated with unexploded ordnance (UXO), and clearance operations continue to this day. Even the Army's own environmental documents acknowledge that UXO removal is a long-term process, with no definitive timeline for completion.

Mākua is sacred. It is home to ancestral burial sites, significant cultural landmarks, and nearly 50 endangered plant and animal species. While these facts are mentioned in the FEIS, the document fails to ensure enforceable safeguards. State agencies including the Department of Land and Natural Resources and the State Historic Preservation Division have previously noted the incomplete nature of cultural and biological surveys, especially in areas most affected by past training. This is unacceptable for conservation-designated land.

The FEIS references a preliminary Army assessment that claims there is no documented use of firefighting foam (AFFF) containing PFAS at Mākua. However, that same assessment acknowledges gaps in recordkeeping. Without site-specific sampling or follow-up investigation,

Representative Darius K. Kila

House District 44—Honokai Hale, Nānākuli, Ma'ili
Hawaii State Capitol, Room 322 / Honolulu, HI 96813
Phone: (808) 586-9480 / Fax: (808) 586-9485 / Email: RepKila@capitol.hawaii.gov

Board of Land and Natural Resources

RE: Testimony in Opposition to the Final Environmental Impact Statement for Army Training Land Retention at Mākua Military Reservation

June 26, 2025

Page Two

it is premature, and potentially dangerous, to dismiss the risk of chemical contamination. The absence of data is not evidence of safety.

Despite decades of use, the Army has not presented a clear, enforceable, or comprehensive remediation plan. While UXO clearance is acknowledged, the FEIS lacks detail, measurable benchmarks, or binding timelines, particularly regarding chemical residues, groundwater quality, and long-term monitoring.

The current FEIS does not meet the standards of HRS Chapter 343 or HAR Chapter 11-200. It fails to provide the State of Hawai‘i and the public with sufficient assurances for the protection of cultural practices, ecological health, and long-term land stewardship at Mākua.

Accordingly, I respectfully urge the Board of Land and Natural Resources to reject the FEIS as submitted and require a revised submission that:

- Includes enforceable cleanup timelines for both UXO and potential chemical contamination;
- Completes full cultural and ecological surveys across all affected lands;
- Provides binding mitigation measures tied to any future lease or land retention decisions.

Thank you for your time, your service, and your kuleana to protect the sacred lands of Hawai‘i.

Me ka ‘oia‘i‘o,



Darius K. Kila

Representative, House District 44

Mā‘ili, Nānākuli, Honokai Hale, Ko ‘Olina

From: [Angelina Robinson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony: No Lease Renewal for Army Occupation of Hawai'i Lands
Date: Thursday, June 26, 2025 2:21:43 PM

My name is Angelina Summer Robinson, and I am a resident of Waipahu, Oahu. 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,^[1]_[SEP]
Angelina Summer Robinson
Waipahu, O'ahu

From: [Eileen Rodrigues](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] A'OLE! MORE LAND USE/LEASE FOR MILITARY FOR ALL HAWAIIAN ISLANDS
Date: Thursday, June 26, 2025 3:16:05 PM

Aloha ka kou....

The military has desecrated many of our Hawaiian islands! We were/are made to feel insignificant because of the location for their WAR GAMES. To the military, Hawaii is perfect to pollute. Kind why all the Micronesians are here! What happened to their homes? How about relocating it (your war game playground) to America where there is vast land with less people? If you haven't noticed, we (PEOPLE/KANAKA) live HERE! You are killing our descendants, by polluting our WATER SOURCES!!!!

You are HEWA! Be gone!

Under Distress.....Eileen Rodrigues, Big Island.....

Sent from my iPhone

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

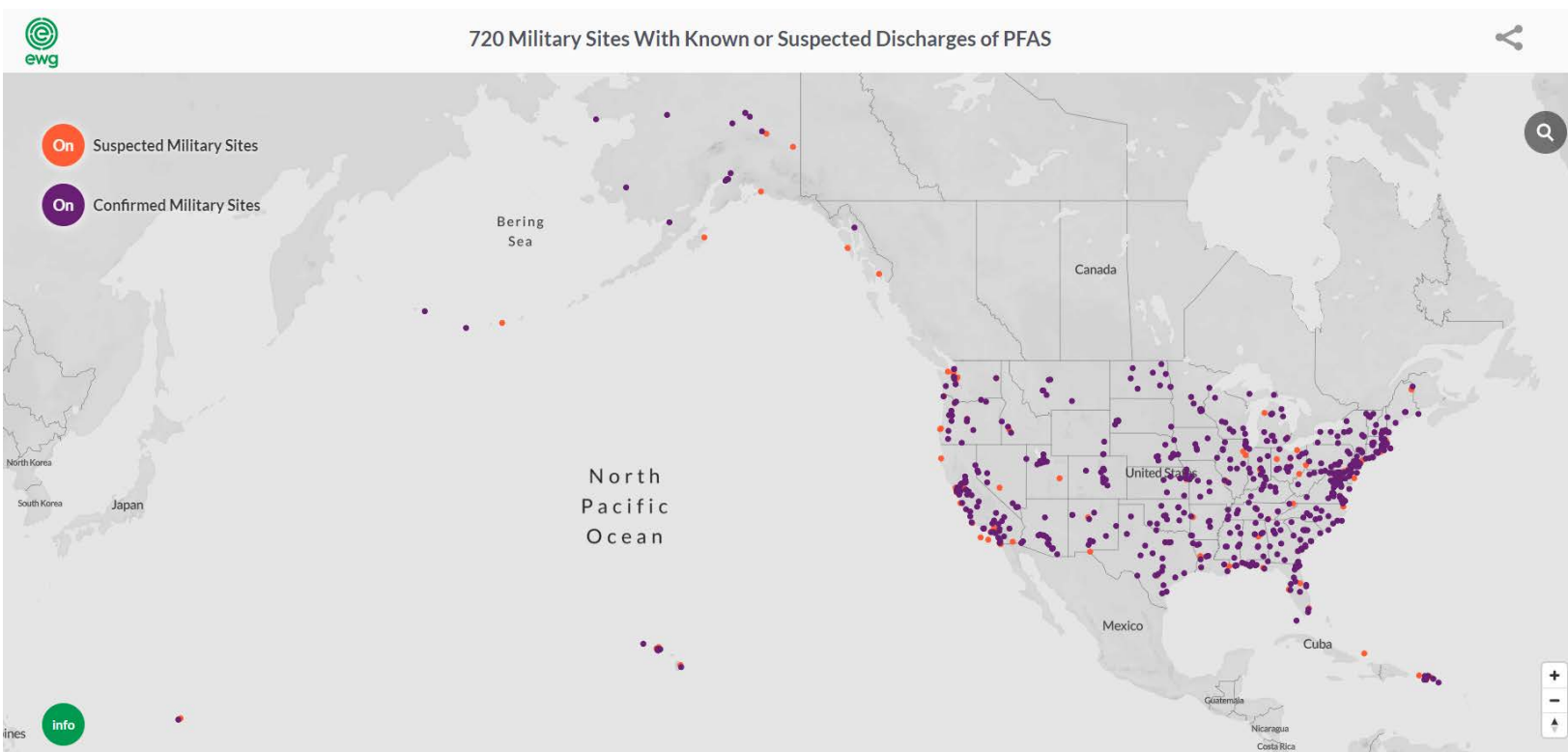
U.S military presence in Hawai'i has shown not only infrastructure failures (such as at Red Hill, Kapūkakī), but a deeper, systemic neglect of Hawaiian rights and environmental stewardship for over a century. At its heart, the crisis is further evidence of the impacts of overlooking traditional knowledge 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

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,



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: [Kaili B. Soon](#)
To: [DLNR.BLNR.Testimony](#)
Subject: KTA Leased Army Area
Date: Thursday, June 26, 2025 11:34:23 AM
Importance: High

Aloha,

My name is Ka'ili Soon my family and I have been a member of the dirt bike community for seven years.

As you are aware, the Kahuku Dirt bike park, is within the KTA training area, this is the only legal place to ride a dirt bike. Oahu has already lost it's drag strip and dirt oval while outer islands have these recreational parks to enjoy. As of now the park is sometimes closed for months leaving us with no other place to legally ride with our families. Even when the park is reopened after military training, we as a dirt bike community need a day or two to clean up the park with all the opala that is left behind by the military. If the Red Hill incident has not taught us local people anything, the Military is only worried about themselves, not even the community that provide resources for. The aina should be retuned to the people, the military has destroyed and occupied enough of our land.

Thank You

Ka'ili Soon
State of Hawaii Judiciary First Circuit
Facilities Manager
Office:(808)539-4005
Cell:(808)348-4224

From: [Meneka Thiru](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Reject the Army's Final Environmental Impact Statement
Date: Thursday, June 26, 2025 12:34:49 PM

Good afternoon,

I'm writing to the Board of Land and Natural Resources to urge you to reject the Army's FEIS for the Kahuku Training Area, Kawaihoa-Poamoho, and Makua Military Reservation. These lands have sacred burial sites, cultural sites, endangered species habitats, and critical water sources, which should be under the management and stewardship of Indigenous peoples and not the U.S. Army. The FEIS doesn't include a full archaeological or cultural survey of the land and is thus not a particularly helpful document. IT also ignores other alternatives for the site. I worry about the Army's use of the land, which has already caused environmental damage and desecration of sacred lands. I hope that you will reject this FEIS and work toward restoring these lands and returning them to the Native Hawaiian peoples.

Thank you,
Meneka Thiru

**U.S. ARMY SUBMITTAL FOR BOARD OF LAND AND NATURAL RESOURCES
MEETING JUNE 27, 2025, ITEM D1**



There are seven Army-managed training areas on O‘ahu used by the U.S. Army Hawaii (USARHAW) to meet mission requirements. The U.S. Government leases approximately 6,322 acres of land on O‘ahu from the State of Hawai‘i (State) for military training on three of these training areas: Kahuku Training Area (KTA), Kawaihoa-Poamoho Training Area (Poamoho), and Makua Military Reservation (MMR). These leases began in 1964 and extend for 65 years to 2029.

The Army prepared an Environmental Impact Statement (EIS) to analyze the potential environmental impacts associated with retaining up to approximately 6,322 acres of State - owned lands on O‘ahu to support continued military training.

The EIS process is one of the steps in a multi-year administrative real estate process; and has allowed the Army to be transparent and given the Army the opportunity to hear comments and recommendations from reviewing agencies and the public.

The proposed action – the Army’s retention of approximately 6,322 acres – is a real estate transaction that allows for the continuation of military activities, including training, and conservation management of the cultural and natural resources present on any retained land. The Army is not proposing new construction or changes in the type or scope of military training. It should be stressed that all training currently conducted has been subject to prior NEPA analyses and resulted in mitigation measures, many of which are ongoing.

The Army began the scoping process for environmental compliance in 2020, at which time state officials provided input on the Army’s approach to applying the Hawai‘i Environmental Policy Act, or HEPA. Following the Army’s Environmental Impact Statement Preparation Notice in the fall of 2021, a 40-day public scoping comment period was held along with a virtual open house. Department of Land and Natural Resources (DLNR) divisions, including the Land Division and State Historic Preservation Division, did not submit any scoping comments.

In June 2024, the Army published the Draft EIS for the O‘ahu land retention effort, which was followed by three public meetings in Wai‘anae, Kahuku, and Wahiawā. The Army received approximately 1,090 submissions with 377 distinct substantive comments.

**U.S. ARMY SUBMITTAL FOR BOARD OF LAND AND NATURAL RESOURCES
MEETING JUNE 27, 2025, ITEM D1**



The Army EIS team worked diligently to ensure that all 1,090 comments were reviewed, and that substantive comments were adequately addressed in the final EIS. As a result, a significant change from the Draft to Final EIS was a shift in the preferred alternative, originally identified as Alternative 2 – modified retention – at each installation, to a combination of modified retention and no action, which would end Army use of additional lands.

Following the publication of the Draft EIS for O‘ahu and receipt of public and agency comments, the Army re-examined training land requirements and utilization for the leased lands. Careful deliberation and consultation with community leaders resulted in a determination that the leased lands **(782 of 4192 acres)** at MMR are not required to meet training readiness or warfighting capabilities, and could be returned. Additionally, the Army is not seeking to renew any lease for Poamoho, and the non-motorcross parcel at KTA.

The final EIS examines the impacts of retaining leased land, either through fee simple title or a new lease, to determine how much land should be retained, and whether impacts vary by retention method. The final EIS does not make a recommendation on how the land should be retained – i.e., fee or lease – and is therefore not an evaluation criteria for the HEPA acceptance determination.

The final EIS applies compliance with applicable regulations, best management practices, and standard operating procedures to the analysis before making impact conclusions. If compliance with applicable regulations and implementation of existing best management practices and standard operating procedures is insufficient to lessen the intensity of an impact, project-specific mitigation measures have been recommended to actively avoid or minimize new adverse impacts.

The final EIS indicates that under the preferred alternatives, which varied by the amount of land retained, significant adverse impacts could occur on land use (land tenure). The No-Action Alternative, wherein the lease would simply expire, would have less than significant adverse impacts and beneficial impacts at MMR for cultural practices.

The Army is confident that all NEPA and HEPA requirements have been met and notes that the 2019 update to the HEPA rules allows federal NEPA EISs to be submitted to comply with HEPA as long as other requirements (for example, a cultural impact statement) are

completed as part of the process. The Army has carefully cross-walked the NEPA/HEPA requirements throughout the document to make it easier for the reader to track compliance.

With regard to DLNR Land Division staff comments on perceived shortcomings of the final EIS, the Army offers the following responses:

U.S. Army Responses to: Land Division (LD) submittal for June 27, 2025 BLNR Meeting regarding the acceptance or non-acceptance of the O‘ahu ATLR FEIS

Content Requirements

Adequacy of analysis of environmental impacts and lack of baseline data:

- Final EIS does not, “fully declare the environmental implications of the proposed action” and that the Board has not been given the “full range of responsible opinion on the environmental effects” (HAR 11-200.1-24(a)), or reasonably foreseeable consequences.
 - ***The EIS provides adequate information to make an informed decision about the impacts of the action. HEPA is not designed to explore every single potential impact or effect.*** See, e.g., [*Life of the Land v. Ariyoshi*, 59 Haw. 156, 164, 577 P.2d 1116, 1121 \(1978\)](#); [*Price v. Obayashi Haw. Corp.*, 81 Hawaii 171, 182, 914 P.2d 1364, 1375 \(1996\)](#)
- Baseline data is insufficient:
 - ***Existing conditions, supported with included data, observable on the State land at issue, appropriately establish the baseline for the EIS analysis. This baseline considers all prior and current activities, environmental monitoring, and conservation efforts. Each resource area section discusses the combined impact of past, present, and reasonably foreseeable future actions on that resource. Analysis of State use and future impacts to the lands not retained by the Army is beyond the scope of this EIS.***
- Based on the Department’s many concerns, LD staff believes that the Board would not have enough information to make “a sound decision based upon the full range of responsible opinion on environmental effects” when a long-term land disposition is brought before them for decision making.
 - ***The Army asserts that there is sufficient information for the Board to make an acceptance determination on the proposed action (how much land the Army will negotiate to retain and which lands to return to the State) and preferred alternatives. The Army has provided in-depth descriptions of existing conditions and environmental impacts for each action alternative***

and the no action alternative. Acceptance of the EIS does not obligate the Board to any future decision regarding a long-term land disposition.

Biological Resources

- LD staff noted that there were major data gaps as the consultant and the applicant appeared to piecemeal existing studies to provide an overview of the existing environmental setting and noted that there were not current comprehensive studies or surveys prepared for the State-owned leased lands. (Draft EIS comments applicable to Final EIS.)
 - ***Under both NEPA and HEPA, EISs are compiled and analyses are completed based on all relevant research and studies to date. This includes both historical and current data and surveys as well as current natural resources management actions. Additionally, these data are compiled into an Integrated Natural Resources Management Plan (INRMP), which DLNR is a signatory. In other words, the natural resources plan which the Army uses to implement conservation and mitigation efforts is reviewed, analyzed, and approved by the state.***
 - ***In addition to Army natural resource management programs, DLNR DOFAW was awarded approximately \$18 million in REPI funds through the Army for FY23 and FY24 to be used for natural resources management.***

Biological Opinions/Programmatic Biological Assessment

- The EIS relies on information from a 2003 BO for all training areas and BOs from 1999, 2004, 2007, and 2008 specifically for MMR.
 - ***Biological opinions result from ESA Section 7 consultation regarding potential taking of threatened and endangered species, generally initiated when there is military construction or new training initiatives. The BOs currently in place (1999, 2003, 2004 and 2008) are currently in force and guide management of and mitigation for natural resources affected by any construction or training within the covered area.***
 - ***Implementation of the BOs requires annual status reports that are provided to DLNR DOFAW, and are available for public review.***
- USAG-HI is proposing to conduct a 2025 Programmatic Biological Assessment which ideally should have been prepared as current baseline information to inform the EIS document.
 - ***The PBA is currently being routed to USFWS, initiating formal consultation for preparation of a Programmatic Biological Opinion for all O'ahu installations.***

- DOFAW determines that the Final EIS does not adequately describe the impact standards, stabilization criteria, and status of mitigation work for plants and animals reviewed in biological opinions from the USFWS. Disclosure of the impact standard, stabilization criteria, and status of mitigation work in the ATLR FEIS is necessary because DOFAW is not a part of the approval process for Section 7 biological opinions, and the military is not required to seek a habitat conservation plan or incidental take license from the Department... providing the impact standard, stabilization criteria, and status of mitigation work...helps DOFAW to determine whether the impacts to specific species are acceptable, should either the Proposed Action or Preferred Alternative be chosen.
 - ***Annual implementation status reports are provided to DOFAW and includes all requested information. These reports are also available on the project website. Further, DOFAW has the 2024 annual status report which was distributed to partner agencies in November 2024. (Refer to 2022, 2023, and 2024 status reports).***

Aquatic Resources

- DAR requested aquatic biology surveys for the streams that are located within the State-owned leased lands as no data regarding stream biota was available for them to review to evaluate the determination of minimal effect.
 - ***There are no permanent streams within any of the State-owned land as clearly noted in the FEIS; only intermittent or ephemeral streams are present. Army natural resources professionals continuously evaluate for all aquatic resources that may be affected by training or conservation activities.***

Historic and Cultural Resources

- The Historic and Cultural Resources Literature review that the Draft EIS relied on provides an inadequate baseline for assessing the direct, indirect, and cumulative impacts to historic and cultural resources within the State-owned lands (Draft EIS comments applicable to Final EIS.)
 - ***The Army conducted a thorough Cultural Resources Literature review and asserts that the baseline used for assessing impacts to historic and cultural resources within state-owned land is adequate. A description of all previous surveys and sites identified for all state-owned lands was provided along with an analysis of the site characteristics.***
- Only approximately 19% of the ROI has been subject to an archaeological inventory survey (Draft EIS comments applicable to Final EIS.)

- ***Section 3.4.5 of the Final EIS discusses the Army's Cultural Resources program, including the State-owned lands. Previous archaeological surveys are provided in Table 3-23 and Table 3-25 of the Final EIS. The majority of the State-owned lands have been surveyed with the exception of steep slopes. Sections 3.4.5.1 (for KTA) and 3.4.5.3 (for MMR) of the Final EIS were revised to explain that the majority of State-owned lands used for ground training have been surveyed, and reasons why remaining areas are constrained. Poamoho is not used for ground training and is a heavily dissected, steeply sloping landscape.***
- ***Of the 450 acres of State-owned land at KTA Tract A-1, 416 acres (93 percent) have been subject to archaeological survey. Of the 700 acres of State-owned land at KTA Tract A-3, 182 acres (26 percent) have been subject to archaeological survey. Three primary reasons have constrained full survey of remaining areas: 1) the terrain is composed of very steep slopes and dissected hills, especially within KTA-3 (see Figure 3-13); 2) activities (e.g., ground-based training or other Federal undertakings) that trigger a cultural resources study (e.g., a Section 106 undertaking) have not occurred in unsurveyed areas (ground-based training has not occurred at KTA-3 for approximately 20 years); and 3) some of the unsurveyed acreage has sustained heavy disturbance from motorcross activities that preclude the utility of an archaeological survey.***
- ***Of the approximately 162 acres of State-owned land available for ground-based training, 161 acres (99 percent) have been surveyed. Approximately 620 acres at MMR are not actively used for ground-based training; these areas include State of Hawai'i park land on the makai side of Farrington Highway as well as areas outside of firebreak roads throughout the installation (e.g., Makai Tract, North Ridge Tract, and South Ridge Tract). Of the 620 acres not actively used for ground-based training, 116 acres (19 percent) have been surveyed. Acreage that is currently unsurveyed is due to three primary reasons: 1) activities (e.g., ground-based training or other federal undertakings) that trigger a cultural resources study (e.g., a Section 106 undertaking) have not occurred in unsurveyed areas; 2) some areas are composed of very steep slopes that are unsafe to survey on foot; and 3) some of these areas are controlled by State Parks.***
- Cultural resources should have been evaluated within the broader spatial context within each of the three training areas especially in those areas where resources within the ROI are known to extend outside of the ROI (Draft EIS comments applicable to Final EIS.)

- ***Any cultural resources on or near the border between State-owned and federal lands were included in the study.***
- LD and SHPD staff continue to have concerns with the lack of surveyed areas. SHPD continues to recommend adequate archaeological surveys of the ROI. The significant unsurveyed acreage within KTA, MMR, and Poamoho may contain historical and cultural sites that remain unidentified. No consideration has been given to potential unidentified archaeological and cultural sites mentioned in native Hawaiian traditions that could potentially be within these unsurveyed portions of the ROI.
 - ***See above re extensive surveys and rationale for areas not surveyed.***
- SHPD states that while Poamoho is currently used for aerial training only, this does not preclude the possibility of future ground-based training or incidental and accidental impacts to terrestrial resources...sufficient data must be included to fully understand the potential risks to cultural and historic features subject to both federal and state laws.
 - ***This issue is covered in the 2018 Training PA. Poamoho is dominated by a steeply sloping, impenetrable jungle. The Army invites SHPD staff for a field visit to observe the area, and will facilitate SHPD efforts to initiate their own survey at any time.***

Cultural Impact Assessment

- The Final EIS does not include significant published material relevant to potential historic and cultural sites within the ROI. There are multiple published Hawaiian stories set within the ROI that are not included in the CIA.
 - ***In addition to interviews conducted, all available ethnographic and historical resources were consulted for the preparation of the CIA. The CIA cites multiple mo'olelo associated with each of the installations evaluated in the EIS. The Army acknowledges that additional mo'olelo may be available.***
- The Draft EIS and the Final EIS does not contain enough information for any agency to conduct a proper Ka Pa'akai analysis.
 - ***The Army is confident in the content and quality of information to conduct a proper Ka Pa'akai assessment.***
- The State Aha Moku Executive Director indicated that the CIA did not consult with the key people/kupuna from the relevant mokus nor did the Army reach out to the Executive Director in attempt to consult with the State Aha Moku as requested by LD staff and the Chair.

- ***Army contractors consulted with multiple respected community members/kupuna from central, west, and north O‘ahu for the CIA. To assert that these kupuna are not relevant is insulting to those consulted.***
- It was not until May 22, 2025, that the Executive Director informed LD Staff that the Army had reached out to request a meeting with the State Aha Moku which was subsequently scheduled for June 10, 2025.
 - ***The Army had meetings with the Aha Moku director on August 19, 2024 and October 15, 2024. See Appendix L of the final EIS. Furthermore, members of the Aha Moku were contacted for interviews during the CIA process. Consultation with Aha Moku is not a requirement under the HEPA process, nonetheless the Army looks forward to continued, additional collaboration with Aha Moku representatives.***

Water Resources

- CWRM has concerns over military uses and the potential for ground water degradation, and thus the potential for reducing availability of water for potable use and further indicated that not enough information has been provided for CWRM to determine any impacts to ground water.
 - ***The CWRM letter does not refer to any facilities or concerns related to the proposed action. It is a generalized statement reaffirming the need for best management practices, which the Army follows at all locations.***

Conservation District

- OCCL continues to reiterate that military use is neither consistent with the overall objective nor the allowable uses in the Conservation District and that a rule amendment to allow such uses may not be a likely scenario.
 - ***The Army acknowledges that an amendment is not a likely scenario and noted in the EIS the administrative difficulties of obtaining a rule amendment to allow for military activities on Conservation District lands.***
- USAG-HI did not include any other alternatives in which they could comply with the Conservation District, i.e. applying for a Land Use District Boundary Amendment to move the training areas out of the Conservation District into a more appropriate district designation that would allow for military use.
 - ***The Army did note in the EIS that a land use boundary amendment could be sought in order to pursue a lease; however, discussions with LD and OCCL staff in November 2022 made clear that an Amendment was unlikely and therefore, based on the LD’s assessment, did not include this alternative.***

Scope of the proposed action

- USAG-HI believes that any clean up and compliance with lease conditions is outside of the scope of the Proposed Action but nevertheless describes the generic process of complying with CERCLA. LD staff disagrees as any land returned to the State would require USAG-HI to propose cleanup and restoration activities especially as the related to hazardous substances and wastes, including munition and explosives of concern (MEC), in order to begin proper negotiations for the return of the lands.
 - ***Lease compliance actions are included as part of the proposed action in the EIS; however, clean up related to hazardous substances and MEC is conducted under the federal CERCLA rules that will be part of the negotiation with the State following the conclusion of the NEPA/HEPA process. CERCLA has its own, separate public involvement process.***
- Additionally, as the Final EIS treats the collective Oahu land dispositions as a single project, LD staff notes that the Board could impose cleanup and restoration requirements on the USAG-HI for any lands returned to the State as a condition for a potential new lease for other areas. Therefore, LD staff believes, especially due to the Preferred Alternative, that at least from a HEPA perspective, proposed cleanup and restoration activities should have been considered as part of the overall scope of the Proposed Action.
 - ***This is acknowledged in the EIS. The Army agrees that the State can negotiate terms and conditions for any new lease and cleanup is covered in the current lease terms.***

Program vs. Project

- LD staff notes that the EIS does not distinguish the proposed action as either a project or program. (HAR 11-200.1-24(b))
 - ***The proposed action is a project.***
- LD staff notes that there are two issues in which distinguishing the Proposed Action as either a “program” versus as “project” may be important.
- The first issue is the use of Conservation District lands for military training. The Final EIS uses the “hypothetical scenario” that the BLNR would establish a new subzone through a rule amendment that would allow military uses in the conservation district...” OCCL disagrees that this scenario could be contemplated as “likely to occur” as military use is not consistent with the overall purpose of the Conservation District. Another option would be for USAG-HI to apply for a Land Use District Boundary Amendment. Nevertheless, should the Board take the position that the proposed action is a program, then the Board could find that this content requirement is satisfactorily complied with given that this requirement allows for the analysis of hypothetical scenarios.

- ***The Army disagrees with this logic. To analyze the impacts of a lease, a critical assumption of a rule amendment was required to complete the analysis. Without an administrative rule change, a lease is not a viable option but was evaluated as a possible scenario for completeness. This does not reflect the types of “hypothetical scenarios” that might be covered under a programmatic approach.***
- The second issue is that comments from agencies and the public have requested that the Army provide more information and analyses regarding clean-up activities should the State-leased lands be returned to the State public trust. If the Board should take the position that the proposed action is considered a program, then this content requirement could be considered satisfactorily complied with as it allows for omission of “evaluating uses that are not yet ready for decision at the project level.” However, LD staff believes that proposed cleanup and restoration activities should be considered as part of the project especially as the Preferred Alternative considers returning majority of the State-leased lands back to the State and would also act as the starting point for negotiations.
 - ***As stated above, lease compliance actions are included as part of the proposed action in the EIS; however, clean up related to hazardous substances and MEC is conducted under the federal CERCLA rules that would be triggered upon return of the land and will be part of the negotiation with the State following the conclusion of the NEPA/HEPA process. CERCLA has its own, separate public involvement process.***

Consistency with federal, state, and county plans/policies/controls (Conservation District) – Section 4.3

- HRS 183-11, pertaining to the use of government (State) land for forest reserved, states that “any land or lands while so set apart [by the governor] shall not be leased or sold by the government or used in any way for any purposes in consistent with this chapter.”
 - ***The Army’s preferred alternative does not seek to retain any lands designated as forest reserve (DEIS and FEIS).***
- While this section discusses the fact that fee ownership by USAG-HI would foreclose on any future use of the lands, Staff believes that this is also true for a lease scenario as a lease would foreclose on any future uses for the term of the lease. While a lease may allow for provisions to ensure that the range of beneficial uses of the environment is preserved, without including a discussion of what beneficial uses of the environment would be narrowed otherwise, does not provide any helpful information that could be used to craft any potential lease.
 - ***This issue is fully discussed in FEIS Chapter 3.2.***

- An EIS is supposed to include opposing views. Staff believes this section should have included a discussion that the issuance of a long-term land disposition, whether via lease or fee ownership, would foreclose on the use of public trust lands for uses that would benefit the public such as for recreation and cultural practice purposes.
 - ***Opposing views and affects to the Native Hawaiian community are presented throughout the EIS. See sections 3.2 Land Use, 3.5 Cultural Practices, 3.12 Environmental Justice, where alienation of public trust lands are identified as a significant adverse impact. Section 4.6 acknowledges that a fee disposition would foreclose future use and narrow the range of uses by the State. The Army would continue to maintain cultural and recreational access to land retained.***

Irreversible and irretrievable commitments of resources

- The premise that the proposed action is a real estate action is one that Staff believes to be an incorrect statement as we have repeatedly reminded USAG-HI that the State views the action as a proposed long-term land retention method that would allow for the continuance of military training. The continuance of military training and any potential impacts that could result in a gradual or exponential increase in the rate of which an impact could/would occur or the severity of such impacts due to length of time should be addressed. Furthermore, Staff's discussion regarding the provided baseline data leaves room for questioning the baseline impacts analyzed and discussed in Chapter 3.
 - ***The Army has consistently maintained that the proposed action is administrative in nature – it is a real estate action. Continued military training has been incorporated and analyzed as related to the proposed action. Additionally, military training has been subject to separate NEPA analysis.***

Unresolved issues

- Given that OCCL believes that military use within the Conservation District is not consistent with the overall purpose of the Conservation District, Staff believes that this topic should have been included as an unresolved issue.
 - ***The Army acknowledges the difficulty of overcoming the prohibition of military use on Conservation District land, as is discussed in section 3.2. As stated in section 4.2.3, conditions of a new lease will only be determined after the NEPA/HEPA process is complete and negotiations are initiated.***
- DOFAW's comments regarding the use of lands set aside for forest reserves should have also been addressed in this section (Section 4.2 Unresolved Issues).
 - ***The preferred alternative does not include lands set aside as forest reserve. No response required.***

Comments and Responses

- LD staff's opinion is that our comments cannot be considered as being "satisfactory" responded to.

Biological Resources (PBA)

- LD Comment: "the description of the environmental setting should have been supported by current comprehensive studies and surveys that covered the entirety of the State-owned lands that are proposed to be leased."
- USAG-HI response: "Per NEPA and HEPA requirements, the best available data for biological species was incorporated into this EIS."
 - ***Army natural resources staff complete annual status reports that document all conservation activities and mitigation measures and affects. These documents are provided to DOFAW and are provided on the project website.***
- Staff feels that this is contradictory as the EIS describes a PBA currently being prepared that will support a new USFWS Programmatic BO which seems would have been appropriate to use to provide current baseline information for the Proposed Action. Further, this PBA includes newly listed species that were not included in the previous BOs.
 - ***The Army's PBA is intended to update all Section 7 consultation documents to include new training initiatives [not on state-owned land], wildland fire minimization measures, and new species found on installations. It is further intended to streamline formal consultation with USFWS by consolidating the current O'ahu and Makua BOs. All species benefit from ecosystem management and are included in the Army INRMP.***

Historic and Cultural Resources

- Regarding LD and SHPD's comments on the lack of surveyed areas in the Draft EIS, the Applicant's response was that for KTA "three primary reasons have constrained full survey of remaining areas: 1) the terrain is composed of very steep slopes and dissected hills, especially within KTA-3; 2) activities (e.g., ground-based training or other Federal undertakings) that trigger a cultural resources study (e.g. a Section 106 undertaking) have not occurred in unsurveyed areas (ground-based training has not occurred at KTA-3 for approximately 20 years); and 3) some of the unsurveyed

acreage has sustained heavy disturbance from motocross activities that preclude the utility of an archaeological survey.”

- ***SHPD, unlike most other states, lacks archaeological inventory survey standards which are crucial to guide comprehensive, standardized field surveys. The Army follows general industry standards and guidelines adopted in most other states (e.g. 15-meter interval survey transects; no survey for slopes exceeding 60%). The Army included standards in the 2018 Training PA to which SHPD is a signatory. Survey of state-owned lands complies with the SHPD approved 2018 Training PA and meets industry standard.***
- LD staff does not agree that not triggering the Section 106 process and the motocross activities precludes the Army from doing proper due diligence.
 - ***The Army recommends that SHPD include standards for previously disturbed areas when they develop their AIS standards. Per general industry standards as adopted by most states, an AIS is not required in areas that are demonstrably disturbed (e.g. areas graded below ground surface like the motocross track).***

Exhibit B: Department Comments on Final EIS

DOFAW

- The ATLR FEIS states that all proactive conservation work on federal and state-listed plants and animals contained in the lands that the Army would not retain would cease; however, the ATLR FEIS does not analyze the impact of that action. DOFAW requests an analysis of this impact in the FEIS.
 - ***The conservation efforts will be transferred to the State following the expiration of the Army leases. The Army made a critical assumption that the State would continue to manage the state-owned lands. The PTA DEIS, April 2022, noted the Army’s concern over the State’s ability to effectively manage natural resources, primarily due to funding; however, Land Division asked that those statements be removed from the Final EIS and were therefore not included in the Oahu EIS.***
- Tract A-1 is the only area where legitimate motorcross riding for the public is managed and allowed on O’ahu. The Department is prohibited from entering into a long-term agreement with HMA (or any other park manager) because of the current Army lease, despite the public and environmental benefit what would be realized by a longer-term land disposition. Army regularly closes the area to the public for training purposes.
 - ***If the State is requesting to assume control and manage the motocross track for the over 5,000 members of the motocross community, that should be expressly stated and will be included in negotiations over land disposition.***

Otherwise, the Army will continue to manage the track as is, and no increase of training is planned or anticipated.

SHPD

- The Historic and Cultural Resources Literature Review does not include significant published material relevant to potential historic and cultural resources within the ROI. There are multiple published Hawaiian stories set within the ROI that are not included in the CIA, including (but not limited to) the stories of Kelea, Lō'aikanaka (O'ahunui), and Pa'ahana.
 - ***The CIA cites multiple mo'olelo associated with each of the installations evaluated in the EIS. The Army acknowledges that additional mo'olelo may be relevant.***

From: [Sele Williams-totten](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda item D-1
Date: Thursday, June 26, 2025 1:04:12 PM

Aloha Chair Chang and Members of the Board of Land and Natural Resources, My name is Sele, and I was born and raised here on O‘ahu. I’m writing to urge you to reject the Army’s Final Environmental Impact Statement (FEIS) for land retention. I don’t work in politics or law, but I do care about the land. Like a lot of us, I’ve seen how the military treats the ‘āina; contamination, destruction, and broken promises when it comes to cleanup or accountability. This FEIS doesn’t change that. It’s missing real cultural consultation, environmental protections, and basic answers about how they plan to fix the damage already done. We’ve seen the same issues before at places like Pōhakuloa, and now it’s happening again. These lands deserve better stewards. Hawai‘i deserves better. Please do the right thing and reject this FEIS. Mahalo for taking the time to read this. Respectfully, Sele Williams-Totten

From: [Joe Wilson](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Thursday, June 26, 2025 12:44:54 PM

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

I write to strongly urge the BLNR to REJECT the U.S. Army's Final Environmental Impact Statement for the Makua Military Reservation, Kahuku Training Area, and Poamoho.

As a resident of O'ahu for 20+ years, on property directly bordering the KTA lands sitting on the hillside above the densely populated Kaunala/Velzyland neighborhood on the north shore, I have been witness to and victim of the military's regular and ongoing disrespectful and damaging uses of the area.

The widespread concerns that emerged in communities across the islands during the military's Red Hill Underground Fuel Storage Facility leakage and cover-up scandal, along with the distrust created by the military's unwillingness to engage with or support community damage-control efforts during the wildfire crisis that erupted on KTA lands in June 2022 only heighten concern about the many other longstanding environmental, public trust, and Native Hawaiian cultural rights concerns regarding military misuse and abuse raised by community advocates for decades.

Regarding this FEIS, these issues include those recently highlighted by the Sierra Club of Hawai'i:

- Reliance on outdated 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 as requested by the Division of Aquatic Resources;
- A lack of needed surveys for historic sites and cultural resources;
- The omission of published mo'olelo in the EIS' cultural impact assessment;
- A lack of consultation with key cultural knowledge keepers;
- A lack of sufficient information to conduct a Ka Pa'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 reserve regulations, and no plan to pursue compliance with Hawai'i's land use laws; and

- A lack of concrete proposals to remediate and clean up lands that may be relinquished back to the "state."

Most of these concerns are not new — they were raised repeatedly by DLNR staff and the community, and many are substantially like those cited by the BLNR in its rejection of the Pōhakuloa FEIS. Yet the Army still submitted this FEIS in blatant disregard of the feedback of DLNR staff and the community as well as Hawai'i's environmental and land use laws.

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,

Joe Wilson
North Shore O'ahu
Haleiwa, HI 96712

From: [Nate Wissmann](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Thursday, June 26, 2025 11:40:58 AM

Aloha Chair Chang and Members of the Board of Land and Natural Resources,
My name is Nathan 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,

Nathan Wissmann

From: [Yam, Alexandra](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony on Agenda Item D-1
Date: Thursday, June 26, 2025 1:28:49 PM

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

My name is Alexandra Yam 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 agreement with the points made in the DLNR Staff Submittal on Item D-1, and support 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,

Alexandra Yam

From: [Kathryn Butterfield](#)
To: [DLNR.BLNR.Testimony](#)
Subject: [EXTERNAL] Testimony Agenda Item D-1
Date: Thursday, June 26, 2025 11:39:04 AM

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 long standing 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.

As someone who has witnessed the contamination of O‘ahu's once-pure sole source aquifer due to the Navy's decades-long disregard for the precious wai underlying its Red Hill Fuel Facility, I urge you to reject the Final Environmental Impact Statement (FEIS) before you today.

The BLNR must remember the harsh lessons of Kapūkakī and your public trust obligations, 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.

Katie Butterfield
J.D. Candidate, Class of 2026
William S. Richardson School of Law
University of Hawai'i at Manoa
knbutter@hawaii.edu