
[EXTERNAL] Testimony: Item VIII B The Mauna Kea Comprehensive Environmental Impact Statement EIS

From Cheryl B [REDACTED]
Date Mon 7/6/2026 2:55 PM
To Maunakea Authority Testimony <mka.testimony@hawaii.gov>

Aloha Chair and Members of the Authority,

Thank you for the opportunity to provide testimony on item VIII. (B) the Mauna Kea Comprehensive Environmental Impact Statement (EIS).

As the authority prepares to assume full management of the summit lands, it is **critical** that this **new EIS** does not merely replicate the flawed, development-driven frameworks of the past. **The previous final EIS documents prepared for the Thirty Meter Telescope (TMT) explicitly admitted to a "substantial, significant, and adverse" cumulative impact on the cultural, historical, and ecological resources of the mountain. Yet, those documents were used to justify further development rather than protect the mauna.**

Because of this, **we strongly urge** the Board to model this Comprehensive EIS under a **"Zero Further Development / Natural and Cultural Restoration Baseline."** If the EIS is to truly protect the mauna, the final document must legally include and rigorously evaluate the following physical, biological, and cultural disclosure metrics:

1. **Cumulative Impact & Conservation Compliance**

- **Historical Degradation Tracking:** The EIS must formally include an exhaustive baseline section that quantifies and maps the exact historical, cumulative degradation to the summit region caused by over fifty years of telescope operations.
- **Conservation District Thresholds:** The document must establish clear, binding carrying-capacity metrics showing exactly where cumulative impacts legally bar any further permanent construction under Hawai'i Administrative Rules (HAR § 13-5).

2. **Phased Decommissioning, Footprints, & Ecological Restoration**

- **Full Deconstruction Protocols:** Establish strict, step-by-step engineering and environmental standards for the eventual total dismantling of all existing observatories as their leases approach expiration.
- **True Physical Footprint Audits:** Require rigorous, independent spatial measurements of actual ground and sub-surface disturbance. **The EIS must ban the misleading practice of claiming a massive new development fits entirely within a previous, smaller telescope's "disturbed footprint."** This is especially relevant with current "conversations".
- **Restoration Verification & Biological Targets:** Set clear, enforceable biological and geological targets for restoring the subalpine and alpine ecosystems, specifically prioritizing the fragile habitat of endemic species like the wēkiu bug.
- **Hazardous Material Remediation:** Mandate extensive sub-surface soil and deep-water aquifer testing beneath every single facility to track, disclose, and remediate decades of industrial

lubricants, mercury, and wastewater runoff. We do not believe this has been adequately addressed over the years by those who have been actively engaged in activities on the Mauna.

3. Cultural, Spiritual, & Landscape Rehabilitation

- **Visual Horizon Reclamation:** Utilize advanced modeling to track the gradual restoration of the mountain's pristine, unobstructed view sheds and sacred lines-of-sight as structures are progressively removed over time.
- **Intangible Cultural Resource Protection:** Establish concrete acoustics and traffic baselines to measure and enforce the return of natural silence and environmental integrity to the summit, directly addressing the intangible spiritual and psychological well-being of the community. This goes along with some of the discussions held when MKSOA had the community talks.

4. Low-Impact Science & Infrastructure

- **Low-Impact Educational Infrastructure Guidelines:** If any educational or cultural footprints are considered, the EIS must set strictly non-intrusive design guidelines to ensure they never repeat the heavy concrete-and-steel impacts of the past.
- **Climate Change and Permafrost Monitoring:** Shift the environmental and scientific focus of the EIS toward tracking climate impacts on Mauna Kea's unique permafrost layers, weather patterns, and vital freshwater aquifers.

The items listed above represent direct physical, ecological, and cultural impacts that fall squarely within the legal requirements of an environmental disclosure document.

We urge the MKSOA Board to set a courageous new precedent for indigenous-led land stewardship by embedding these precise tracking mechanisms into the core text of your upcoming Comprehensive EIS.

Mahalo for your time and consideration of our testimony.

Dee Green

Cheryl Burghardt

Nuuanu, Oahu