

REJECT THE ARMY'S EIS

Manu Akuna

Aloha Members of the Board of Land and Natural Resources,

My name is Sue Mitsubishi Alana, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Sue Mitsubishi Alana
Kapolei Hawai'i Oahu

Aloha Land Board Members:

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

To put it briefly - the FEIS ignores obvious cumulative impacts from the Army's long and widespread contamination and mismanagement. It is time to move away from these harmful practices and demand better for this sacred wahi pana. We don't even want new telescopes atop Mauna Kea, why would we approve literal bombing there?

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

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

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

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

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

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

Mahalo for your service to our community as the regulator of these precious lands.

Sincerely,

Stacey Alapai

Aloha Land Board Members:

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

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

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Sincerely,

Carla Anderson

Kalaheo, Kaua'i

Aloha kākou. 'O Ha'eha'e ani ko'u inoa.

The continued military bombing practice on the training grounds at Pōhakuloa has devastating environmental consequences for Hawai'i's precious lands, including the dangers posed by unexploded ordnance and the destruction of fragile native habitats. Beyond the environmental damage and potential soil and water contamination, these lands at Pōhakuloa hold historical and cultural significance for Kanaka. To disregard this history and the meaning these 'āina hold for the native people, in addition to the environmental destruction, is unacceptable. I STRONGLY OPPOSE a renewed military lease on these Hawaiian lands, as it would only perpetuate this damage and disrespect. LAND BACK!

Mahalo nui

Aloha Members of the Board of Land and Natural Resources,
My name is Brianna Bayne, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

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The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed. Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Brianna Bayne

O'ahu, Hawai'i

Chairperson and Members of the Board,

We respectfully urge the Board of Land and Natural Resources to reject the United States Army's Final Environmental Impact Statement for the proposed retention of State lands at Pōhakuloa Training Area on Hawai'i Island.

It is clear that the Final EIS does not meet basic legal, environmental, cultural, and fiduciary standards. We offer just a few reasons to demonstrate the inadequacy of the EIS and why it should be rejected.

- The Army has surveyed only about 25 percent of the area for cultural sites, meaning **most of the land has not been checked for sacred or historic resources.**
- The Army's preferred plan would damage historic sites protected under federal law, which they openly admit.
- **The Army has not identified any Traditional Cultural Properties**, yet says more study is needed—meaning **key information is missing.**
- **Cultural practitioners will still have limited access to sacred areas**, and no new plan is offered to improve access.
- **The Army does not propose new steps to protect cultural sites** beyond what it already does, even though it admits damage will continue.
- **Native ecosystems at PTA have already been severely harmed**, and the Army admits this damage will keep happening.
- **Endangered plants** live in parts of PTA that are federally protected, and the **Army acknowledges its activities will still threaten these habitats.**
- Wildfires caused by training are a known issue, with over 160 fires reported between 2015 and 2020, but **the EIS doesn't include a detailed risk assessment or new prevention strategies.**
- The EIS mentions some wildfire prevention practices but **fails to provide a detailed risk assessment** that shows how often fires might happen and how severe they could be. It also **lacks a full plan for restoring areas** damaged by fire.
- The EIS refers to a **Programmatic Biological Assessment** related to endangered species, **but since this assessment isn't finished or included, the BLNR cannot properly evaluate impacts to protected species.**

- The **EIS offers little analysis of freshwater (wai)** and its importance in Native Hawaiian culture. **It does not explain how military activities might affect these important resources.**
- Groundwater beneath PTA could be at risk, but **the EIS doesn't include a full hydrogeological study** to understand the long-term impacts of potential contamination.
- While the Army says it tries to reduce water pollution, the **EIS does not list specific monitoring programs to track contamination risks to groundwater** over time.
- The Army admits there is soil pollution from things like lead and explosives but **does not provide a clear cleanup plan with deadlines or standards.**
- The EIS says cleanup will happen, but it **does not explain when, how, or to what level. It also fails to say who will ensure the cleanup happens** if Army funding or presence changes.
- There is **no financial guarantee mentioned in the EIS** to make sure cleanup or restoration will actually be completed in the future.
- While the Army says it will clean up hazardous substances, **the EIS does not fully explain what kinds of pollution exist at PTA or how widespread it is**, based on thorough studies.
- The EIS only looks at a limited part of the natural environment. **It does not study the full range of how Army use could harm native plants and animals throughout the larger area.**
- The Army has not completed **consultation with preservation officials** about cultural and historic sites, even though the Final EIS is already published. This shows **the process is incomplete.**
- The Army **does not offer serious options for returning the land** to civilian use or **for full land restoration.** All options assume continued Army use.

The Board of Land and Natural Resources holds a fiduciary duty to steward these lands for the benefit of current and future generations, not for exclusive, long-term military occupation without robust analysis or restoration. The Final EIS does not meet this standard. It fails to provide adequate cultural and environmental review, it offers insufficient alternatives, and it proposes no concrete path for healing the land or returning it to the public in a usable condition.

For these reasons, we respectfully urge the Board to reject the Army's Final EIS.

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

Cheryl Burghardt

Wendy Green

Kou, Oahu

Regarding the Decision Making Regarding the Acceptance or Non-Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai'i, Tax Map Keys (TMKs) (3): 4-4-015:008; 4-4-016:005; and 7-1-004:007. [Testimony – 5/2, 5/5]

I urge the board not to accept the EIS as provided. The state's own environmental experts have submitted comments describing the document as incomplete and incorrect.

The board must seriously consider these experts' opinions and their concerns and therefore vote Non-acceptance on the EIS as it has been submitted.

Mahalo nui,

--

Amy Cook

Hawaii county resident

Aloha Members of the Board of Land and Natural Resources,

My name is Kailani Crompton-English, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

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Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Kailani Crompton-English

Haiku, Maui Hawai'i

AFFIDAVIT AND NOTICE OF OBJECTION & CLAIM OF JURISDICTION

To: Board of Land and Natural Resources (BLNR) – May 9, 2025 | Agenda Item D.1

Regarding: Final Environmental Impact Statement (EIS) for Army Training Land Retention at Pōhakuloa Training Area

TMKs: (3) 4-4-015:008; 4-016:005; 7-1-004:007

Submitted by:

Roslyn Nicole Manawaiakea Mālama mare Cummings

Living Woman, Ho‘oilina, and Hoa‘āina of the Hawaiian Islands

Trustee and Beneficiary of Mālama: Cummings ‘Ohana GodTrust

Not a U.S. statutory person or “Native Hawaiian” as defined by race-based criteria

I. PROTECTING WAIWAI FOR 7–21 GENERATIONS

This affidavit is submitted in defense of waiwai — our ancestral wealth and spiritual inheritance — which is neither for sale nor concession, but held in trust for 7 generations back and 21 generations forward.

Waiwai includes but is not limited to:

- Wai – the sacred waters: springs, aquifers, rivers, and rains that nourish all life.
- Nutrients – the living soil, volcanic minerals, and native flora that regenerate ‘āina.
- Imprints – the spiritual and physical markers of our kūpuna: iwi kūpuna, mo‘olelo, migration trails, petroglyphs, and ancestral presence.
- Wahi Kapu & Wahi Pana – sacred sites, healing forests, gathering grounds, and ceremonial spaces integral to our customary practices.
- Genealogy and Energy – that which connects us to our kūpuna and descendants, rooted in love, kuleana, and intergenerational law.

I do not come forward as a claimant of ownership, but as a living ho‘aina—a lawful ho‘oilina, entrusted with the protection of these sacred resources. No government, agency, or board may lawfully authorize environmental degradation, desecration, or privatized enrichment over this ‘āina without committing a breach of trust, fraud in fact, and a violation of divine and lawful order.

Military retention of these lands without the free, prior, and informed consent of those with genealogical claim and spiritual duty constitutes a spiritual crime and a legal offense under:

- The rule of evidence
- The law of equity
- International customary law
- And the living covenant between kānaka and ‘āina

Waiwai is not negotiable. It is sacred, generational, and protected by trust.

II. LAWFUL STANDING & RECORDED FILINGS

I have already lawfully filed and recorded my position in public record:

- Supreme Court of Hawai‘i (SCOT-25-0000197)
- Land Court
- Fifth Circuit Court (5CCV-25-0000033)
- Bureau of Conveyances Document Nos. A-9210000469 and A-9210000470 (Recorded March 20, 2025)

These filings:

- Assert my genealogical claim to ‘āina in Hilo and Kohala moku, Ko Hawaii Pae Aina the Hawaiian Archipelago
- Establish the Mālama: Cummings ‘Ohana GodTrust as a living private trust outside statutory jurisdiction

- Declare exclusive equity jurisdiction as the only lawful authority over these ancestral interests
-

III. LEGAL FOUNDATION & EDUCATIONAL BREAKDOWN

A. What Is Fraud in Law?

- Any decision made without full disclosure, lawful consent, or authority is fraud in law.
 - Fraud vitiates all contracts — this includes land retention agreements, leases, and EIS approvals made under false authority or omission of trust obligations.
 - Any benefit taken through fraud is held in constructive trust for the rightful heir(s) and must be restituted.
-

B. Why Common Law Applies

- Common law is the body of natural, inherited rights.
 - It protects land, family, trust, and custom before statutory governments.
 - Under HRS §1-1, the State of Hawai'i recognizes the common law of England, which includes trust principles, equity, and the law of evidence.
-

C. Why Civil Law Applies

- Civil law governs due process, transparency, notice, and remedy.
- The Final EIS violates civil law if it proceeds without:
 - Fair notice to claimants
 - A contested hearing
 - Full disclosure of cultural and environmental harm

D. Why Exclusive Equity Jurisdiction Applies

- Equity is the law of trust, fairness, and remedy.
- The State of Hawai'i and BLNR are acting as trustees of ceded lands.
- When a trustee violates trust duties, only equity has power to correct it.
- Equity recognizes the ho'oilina, not the agency, as the proper claimant.

E. Why Admiralty & Maritime Law Applies

- The military operates under maritime jurisdiction as an agent of the U.S. federal government.
- All land leases, contracts, and resource transfers to the Army are maritime commercial acts.
- Therefore, the State and BLNR are custodians of cargo (land) and must be held to in rem trust obligations.
- Failure to protect sacred 'āina in this context constitutes a breach of maritime custodial duty and subjects the State to equitable salvage.

IV. CLAIM OF CUSTOMARY & TRADITIONAL RIGHTS

As a lawful descendant of kūpuna from Hilo and Kohala moku, Ko Hawaii Pae Aina the Hawaiian Archipelago, I assert customary and traditional rights under:

- Article XII, Section 7 of the State Constitution
- HRS §1-1 (Hawaiian common law and custom)
- Genealogical continuity of practice — including gathering, water stewardship, ceremonial access, and burial protection

The lands encompassed in the Pōhakuoloa EIS include multiple ahupua‘a — lands within my ancestral memory and kuleana.

V. NOTICE TO STATE ATTORNEY GENERAL AND BAR-LICENSED OFFICERS

To the State Attorney General of Hawai‘i, Deputy AGs, and any officer operating under a bar license (esquire):

- You are hereby noticed of your fiduciary obligations under both state and international law.
- Any approval of military retention under these conditions constitutes:
 - Fraudulent conveyance
 - Color of law violations
 - Breach of fiduciary trust
 - Constructive malfeasance and civil liability
- You are required to act under your oath of office and bar license, and will be held individually and commercially liable for any decision that advances harm against lawfully protected customary rights and trust lands.

VI. REMEDY & DEMAND

Accordingly, I demand:

1. Immediate withdrawal or deferral of the Final EIS approval pending full review of recorded objections and genealogical filings
2. A public acknowledgment of customary and traditional rights for the moku of Kohala and Hilo
3. That this affidavit be entered into the public record and board minutes

4. That no military action, lease, or use of land proceed until all equity issues are addressed in full
5. That any fiduciary or statutory official who fails to act honorably be subject to legal and equitable proceedings under exclusive equity jurisdiction

Notice to Agent is Notice to Principal. Notice to Principal is Notice to Agent.

Executed this 7th day of May, 2025

Island of Kaua'i, Hawaiian Islands

Under God's law and the authority of my mo'okū'auhau

All rights reserved. Without prejudice. UCC 1-308.

Signature: Roslyn Cummings

Roslyn Nicole Manawaiakea Mālama mare Cummings

Living Woman, Ho'oilina, and Hoa'āina

Trustee & Beneficiary, Mālama: Cummings 'Ohana GodTrust

Aloha Chair Chang and Members of the Board,

I am writing in strong opposition to the Army's Final Environmental Impact Statement (EIS) for Pōhakuloa. I am a resident of O'ahu with family heritage from Hawai'i, and I call on all the Board Members to respond to our deep ties to Hawai'i island, and specifically Aimee Keli'i Barnes (O'ahu) and Riley Smith (Hawai'i) as my representatives to reject the EIS based on duty to our host peoples and ecological and sacred resources. Below are three reasons for my appeal.

1 – The protection of endangered species is inadequately addressed. The EIS fails to provide a comprehensive plan to safeguard species. Example, the Palila bird, a federally listed endangered species that has declined because of degradation to the māmane forest threatened by military training (U.S. Fish and Wildlife Service).

2 – The EIS defers instead of addresses contamination cleanup, and this is unacceptable. The deferment of training and hazardous materials puts the Pōhakuloa conservation land at risk, contradicting duty to hold land users accountable for restoration.

3 – EIS inadequately addresses Native Hawaiian concerns. The EIS creates a dangerous precedent for continued mistreatment of Pōhakuloa as a sacred site and contradicts the Hawai'i State Constitution and National Historic Preservation Act to protect cultural resources.

I respectfully urge the BLNR to reject the Army's Final EIS for Pōhakuloa, and thank you for the opportunity to testify.

Kalilinoe Detwiler

Kapolei, O'ahu

Land Board Members:

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

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

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

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

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

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

Sincerely,

Ann Dorsey

Aloha Members of the Board of Land and Natural Resources,

My name is Margaret Duka, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

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The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

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I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Margaret Duka
Hawai'i Island, Kona district

To the Board of Land and Natural Resources:

At no time has the Army submitted a sufficient EIS to this body. It has willfully not conducted all necessary studies to provide comprehensive information for the board to make clear decisions. The Army openly admits their live fire training over the past seventy years is the source of widespread contamination, which includes depleted uranium, yet refuses to conduct any proper assessments or make any attempt to clean the area. These heavy metals that have continuously leached into the soil, threaten the largest aquifer on Hawai'i island, yet the Army cannot prove the contamination they have caused has not spread into our water system. There have been thousands upon thousands of acres set on fire through large impact trainings such as RIMPAC, overburdening federal firefighters and driving the climate crisis. They have demonstrated time and time again that they are not the appropriate stewards of our 'āina. This is not a simple real estate transaction, the Army have always been bad tenants. For all of these reasons and so many more, we call on BLNR to fulfill the public trust and REJECT THIS EIS and to take the NO ACTION option. Let these lands return to the people of Hawai'i. Do what you can now to show your aloha for future generations.

Mahalo,

Joy Enomoto

Hope Pelekikena Hui Aloha 'Āina o Honolulu

Aloha Members of the Board of Land and Natural Resources,

My name is Jayelyn Finn-Imamoto, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

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Mahalo for your time and consideration,

Jayelyn Finn-Imamoto

Pahoa, Hawaii

Sent from Proton Mail Android

Aloha Land Board Members:

Below is a statement with reasons for rejecting the renewal of the US Army's lease at Pōhakuloa. In addition to the reasons listed below, I will add that it is time for the state of Hawai'i to be in charge of its own land and to stop letting the US military trash our 'āina. We only have these islands - there are no others for us to move to when, inevitably, the military leaves us with a desecrated, polluted landscape. Look at what happened to Vieques in Puerto Rico. Or our own Kaho'olawe. Reject the lease.

Mahalo,

Kealoha Freidenburg

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

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

Greetings to members of the Board of Land and Natural Resources,

My name is Elisha Galarza-Naeole and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

We need to protect what little land we still have as native Hawaiians. The United States military have affected the Hawaiian islands negatively ever since they arrived. From when they used to block natives from entering certain places/beaches, to bombing our islands for War practices. We cannot keep letting the United States take advantage of our islands. Please deny them any more time to use our land as something that is replaceable.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

Thank you for your time and consideration,

Elisha Galarza-Naeole

Aloha Members of the Board of Land and Natural Resources,

My name is Austin Gonsalves, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Austin Gonsalves

Keaau, HI

Sent from my iPhone Aloha kākou,

My name is 'Eko Lu Leon Guerrero. I am kanaka maoli and I submit this testimony in strong opposition to the U.S. Army's request to renew its lease of state lands at Pōhakuloa Training Area (PTA).

Pōhakuloa is a sacred and ecologically sensitive area that holds deep cultural, spiritual, and environmental significance to the people of Hawai'i. For decades, the Army has used this land for live-fire training exercises, resulting in the destruction of native ecosystems, contamination of the land, and the desecration of cultural sites. The Army's track record of stewardship does not reflect the care and respect that this land — and its rightful stewards — deserve.

The ongoing military presence at PTA has caused irreparable harm to cultural sites and endangered species, and it perpetuates the militarization of our islands, which stands in direct conflict with the values of aloha 'āina and mālama 'āina. Moreover, the Army has not demonstrated sufficient accountability or transparency in addressing community concerns, nor has it adequately mitigated the environmental damage already caused.

Renewing this lease would further entrench military occupation on lands that should be protected, respected, and restored — not bombed and desecrated. The land at Pōhakuloa should be returned to the people of Hawai'i for healing, restoration, and future generations.

I urge you to stand with the community, uphold the values of environmental and cultural justice, and reject the Army's lease renewal request for Pōhakuloa.

Mahalo for the opportunity to testify.

Sincerely,

W. 'Eko Lu Leon Guerrero

Waialua, O'ahu

05/06/2025

Aloha

Please reject the EIS. The American military pollutes and destroys the land with no plan for clean up and no guilt for poisoning it. Why would we allow the military to do this and continue to be awful stewards of the land? It's clear there is no respect for this place, its people, and Hawaiian culture. How long can we continue to allow the military to act like this? You have the chance to start to bring life back to the area. The military knows it damages environment and says who cares. We care. The community cares. We dream of restoration of ecosystems and relationship with pohakuloa. The military only envisions extraction for the purposes of destruction. Our vision is for beauty, life, creativity, relationships and stewardship of the land. Our vision is rooted in love of this place and life in the pae 'aina. Please reject the EIS.

Mahalo

Kristin Hamada

Aloha Members of the Board of Land and Natural Resources,

My name is Elaine Hander, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Elaine Hander
Boulder Creek, California

Aloha kākou,

‘O Kaori-Lei Ka‘imipono Hanohano ko‘u inoa. No Maui mai au a ka no na‘e i ko‘u wa kamali‘i ua noho ko‘u ‘ohana ma Keaukaha ma ka moku ‘o Hawai‘i. Ma leila no i a‘o ‘ia ka ‘ōlelo Hawai‘i e ia‘u.

My name is Kaori-Lei Ka‘imipono Hanohano. I’m from the island of Maui but I was raised in Keaukaha, Hawaii when I was a little girl and where I learned ‘ōlelo Hawaii. I have a responsibility to help take care of and speak up for Hawai‘i.

With that being said I reject the US Army’s final Environmental Impact Statement (EIS) for Pōhakuloa Training Area (PTA).

As a Native Hawaiian, I am deeply concerned about the cultural and environmental risks posed by the Army’s proposed actions. The current Environmental Impact Statement (EIS) is wholly inadequate—especially considering this is a known conservation district, home to endangered species that deserve full protection. Yet the Army continues to fall short in its responsibility to address these critical issues.

The EIS defers necessary environmental cleanup and fails to provide a clear, transparent plan for managing contamination. Cultural impacts are not meaningfully addressed, and the community has received only superficial and insufficient responses.

Moreover, the Army has not demonstrated responsible stewardship of the lands it currently occupies throughout Hawai‘i. From Haleakalā to Red Hill, from Mākua Valley to the devastating legacy on Kaho‘olawe, the U.S. military has repeatedly harmed our environment and sacred spaces.

As Hawai‘i continues to recover from the Maui wildfires, the Army’s EIS remains alarmingly vague and inadequate regarding wildfire risk and suppression efforts. This poses serious long-term threats to our islands’ aquifers, endangered plants and animals, and overall air and water quality. The EIS fails to account for cumulative impacts and continues to downplay the real consequences of military activity.

Given this history and the present risks, the Army’s proposed alternatives in Hawai‘i should not be considered. Our land, culture, and future deserve better stewardship and full accountability.

I respectfully urge the Board of Land and Natural Resources (BLNR) to reject the Army’s Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and to truly listen to the voices of the people. This decision is critical to protecting the lands, ecosystems, and communities of Hawai‘i—both for those who are here today and for future generations.

Na'u no,

Kaori-Lei Ka'imipono Hanohano

Aloha

I 100% oppose PTA and any military involvement on the sacred land of Pohakuloa.

Ka'imi Horito

Testimony of Cheryl Ann Hotta

**RE: Opposition to U.S. Army Retention of Leased Lands at Pōhakuloa Training Area
Before the Board of Land and Natural Resources**

Aloha Chair and Members of the Land Board,

My name is [Your Full Name], and I am testifying in strong opposition to the Army's proposal to retain leased lands at Pōhakuloa and urging you to reject the Final Environmental Impact Statement.

Pōhakuloa is not just land—it is sacred, storied, and ecologically vital. The Army's activities have already caused extensive damage, including the burning of nearly 20,000 acres and ongoing contamination risks from live-fire training and depleted uranium.

The FEIS is inadequate. It fails to meaningfully address impacts to cultural and natural resources, offers no real mitigation, and directly conflicts with the Board's constitutional duty to mālama 'āina.

Military use of this land is not compatible with its conservation status or cultural importance. Enough is enough. I respectfully urge you to reject the Army's FEIS and begin the process of returning and restoring Pōhakuloa.

Mahalo for your time and kuleana.

Cheryl Ann Hotta

Aloha Land Board Members:

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

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

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

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

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

Inadequate Environmental and Cultural Impact Analysis

Lack of a sufficient plan to mitigate impacts to cultural and natural resources

Concerns about depleted uranium on the site have gone unaddressed

Military usage is incompatible with the conservation district designation

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

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

Sincerely,

David Hubbard

Aloha Members of the Board of Land and Natural Resources,

My name is Jaiyah, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Jaiyah

Maui

Aloha Members of the Board of Land and Natural Resources,

My name is Lauren Jecker, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Lauren Jecker
Austin, TX

Aloha Land Board Members:

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

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

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

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

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

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

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

Mahalo for your consideration in this Life Altering decision.

Blessings!

Geralyn St. Joseph

808 261-7866 text or talk

Check out my Author Page on Amazon:

<http://www.amazon.com/Geralyn-St-Joseph/e/B00938QGGM>

50 Ways YOU Can change the World; Small Steps for Making the World a Better Place

Intuitive Business Coach

www.GabrielsTrumpet.net

www.GeralynStJoseph.com

Aloha Land Board Members:

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

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

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

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

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

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

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

**Sincerely,
Georgia, Kalaheo**

Mahalo for taking action!

Aloha my name is Hauoli Kalama. I am in opposition to the releasing of Pohakuloa for the U.S. Military continued desecration of Ke Aupuni O Ko Hawaii Pae Aina (The Hawaiian Kingdom). Below are a list of my thoughts as to why I am in opposition.

The Army's EIS is not adequate.

Conservation District Compatibility

-Unresolved

Protection of Endangered Species

- Inadequately addressed

Environmental Contamination and Cleanup

- Deferred

Cultural Impacts and

Environmental Assessment

- Superficial and Insufficient Response

Evaluation of Alternatives

- Inadequate

Fire Risk and Suppression

- Inadequately Addressed

Acknowledgment of Past Environmental Damage and Contamination

-Insufficient

Community Opposition

-Disregarded

Protection of Cultural and Natural Resources

- Lacks Sufficient Analysis

Environmental Risks

- Downplayed

Long-term impacts on Hawaii island's aquifers, endangered plants, animals and air quality

-Downplayed, Doesn't Account for Cumulative Impacts

Mahalo.

Aloha Chair and BLNR Members,

I, Mio Kamioka, resident of Hilo, Hawai'i, firmly reject the Army's Final EIS for Pōhakuloa Training Area (PTA).

Pōhakuloa has been deeply harmed through years of bombing and mismanagement, leaving behind unexploded ordinances and toxic contamination.

This EIS inadequately addresses protection of endangered species and fire risk and suppression!! The Environmental Contamination and Clean Up has been deferred and the Cultural Impacts and Environmental Assessments are superficial and insufficient!!

The land must be returned to the people of Hawai'i so that healing work can be done to restore Pōhakuloa. I say 'a'ole to the US military, 'a'ole to this sad excuse of an EIS, and 'a'ole to further degradation of our 'āina! Enough is enough!

Please protect our 'āina, and restore power to the people!

Sincerely,

Mio Kamioka

--

Mio Kamioka, M.S. (She/Her/Hers)

Co-Founder and Director of Outreach & Research | **EarthRM 501(c)(3)**

Chief Community and Conservation Officer | **Maui Bioremediation Group LLC**

M.S. Tropical Conservation Biology & Environmental Sciences

University of Hawai'i at Hilo

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

My name is Mikaila Kukalaninui Keawe, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is entirely dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Mikaila Keawe
Anahola, Kaua'i

Aloha Esteemed Members Of DLNR,

Inadequate Environmental and Cultural Impact Analysis:

The EIS is inadequate in addressing the environmental and cultural impacts to the area. Pōhakuloa is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most **endangered species**. The Army has not demonstrated the capacity or will to serve as a proper steward of this land.

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

Furthermore, the Army EIS does not provide a sufficient plan for mitigating the environmental and cultural impacts. Given the military's horrendous track record of cleaning up military debris and caring for the site, it is unrealistic to expect the military to comply with the requirements of a conservation district.

The State has a Constitutional Obligation to Mālama 'Āina:

As affirmed by the Hawai'i Supreme Court (*Kahaulelio v. DLNR*, 2019), "the State has 'the highest duty to preserve and maintain the trust lands' — a duty rooted in the constitutional obligation to *mālama 'āina*, to care for the land." The Court emphasized that the State's trustee obligations exist even without proven lease violations, noting the duty is proactive and preventative.

In *Kahaulelio v. DLNR*, 2019, the Hawai'i Supreme Court found that the State of Hawai'i had breached its constitutional trust duties by failing to: reasonably monitor and inspect trust lands at Pōhakuloa leased to the U.S. military; ensure compliance with cleanup and safety provisions in the lease; take timely action after learning of possible contamination or violations; and document its efforts and provide transparency to the public.

Concerns Over Depleted Uranium Contamination:

The presence of depleted uranium in the soil at Pōhakuloa is consistently churned up and aerosolized during live fire exercises and blown across the island. Exposure to depleted uranium is linked to cancer and many other negative health impacts.

Military Use Conflicts with Conservation Land Use Designation

It is hard to conceive of any ongoing military use of the site that would be compatible with the site's designation as a conservation district. The proposed military uses of this site are

simply incompatible with the conservation designation. Ongoing live-fire and bombing in the area threaten the native flora, fauna and cultural resources of the area, including some of Hawaii's most endangered species. The EIS does not provide specific or adequate mitigation measures to prevent impacts to the critical habitat or culturally significant sites.

In light of this information and evidence please dismiss the Army's extension of using this cultural sight of the Native Hawaiians. Be Pono.

Aloha Pumehana,

Ann Keeler

annjleeler@gmail.com

Aloha My name is Lauae Kekahuna a lineal descendant of Puna, Hawaii on Moku a Keawe. It is with deep concern that you favor with the People of Hawai'i and REJECT the Armys final enviornmental Impact statement for the Pōhakuloa training area due to the MANY cultural and health concerns of our land and people in the past, in the present and in the future.

Aloha,

Lauae Kekahuna

I'm writing today to urge that you reject the army's finale environmental impact statement for the Pōhakuloa training area. Their assessment inadequately addresses past environmental damage and contamination, disregards community opposition, and lacks sufficient analysis for the protection of cultural and natural resources. It downplays environmental risks such as long-term impacts on Hawai'i island's aquifers, endangered plants, animals and air quality. It doesn't account for cumulative impacts, or fire risk.

Please do not accept this excuse for an EIS. The army must be held to a fair and just standard and this land must be protected.

Sincerely,

Nicole

Aloha Members of the Board of Land and Natural Resources,

My name is Kekuamakana Kobashigawa, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Kekuamakana Kobashigawa
Makakilo, HI

Aloha Members of the Board of Land and Natural Resources,

My name is Micaela Krusemark, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Micaela Krusemark
Dallas, TX

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

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai‘i Island. This FEIS fails to meet the basic requirements of Hawai‘i’s environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army’s final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- **Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.**
- **A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.**
- **Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.**
- **Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.**
- **No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.**
- **Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.**
- **Incomplete greenhouse gas data, while making unsupported claims about climate impacts.**

It is insensitive and reckless to implement a new effort of the US Army to occupy public trust land in the wake of the Red Hill tragedy, which poisoned a community's water source and reminded us firsthand the dangers of militarization.

This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities.

It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,



**Joelene Kuaana (She/Her/Hers)
Mentor Center Case Manager**

Big Brothers Big Sisters of Maui

Direct: 808-445-3815

Agency: 808.242.9754

Fax: 808.356.3554

**200 Waimaluhia Lane, Wailuku HI
96793**

**BBBSHawaii.org / [ways to support
BeBigNow.org](http://ways to support BeBigNow.org)**



**Maui United Way Partner Designation
Code: 72090**



Hawai'i Island Chamber of Commerce

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TESTIMONY BEFORE THE BOARD OF LAND AND NATURAL RESOURCES

Acceptance of the Final Environmental Impact Statement (EIS) for the Army Training Land Retention at Pōhakuloa Training Area, Island of Hawai'i

Friday, May 9, 2025 at 9:00 AM

Aloha Chairperson Chang and members of the Board of Land and Natural Resources,

The Hawai'i Island Chamber of Commerce is a 501(c)(6) non-profit organization representing more than 350 member businesses and non-profit organizations, individual members and thousands of employees across the of Hawai'i Island. Our mission is to provide leadership and advocacy to foster a successful business environment in East Hawai'i.

Pōhakuloa Training Area (PTA) is a premier military training facility in Hawai'i and the Pacific. It plays a vital role in our local economy, directly employing 230 individuals and contributing approximately \$74 million annually. PTA also serves as a critical emergency response hub, often being the first to respond to incidents along the Daniel K. Inouye Highway, and provides ongoing support to our community through education, outreach, and public safety partnerships. The Hawai'i Island Chamber of Commerce's vision is to enhance our community's quality of life through a strong, sustainable economy. PTA supports this vision through significant local infrastructure projects—such as Quonset huts, rock quarries, and drainage systems—that frequently involve local contractors. Additionally, visiting soldiers infuse our economy with travel and spending.

PTA's value to our island extends beyond economics. The training area is instrumental in supporting Hawai'i's First Responders and law enforcement agencies. The Hawai'i Police Department, Hawai'i Civil Defense Agency, State Office of Homeland Security, Hawai'i Emergency Management Agency, and other emergency response entities regularly utilize PTA to conduct essential training that ensures readiness and public safety. PTA's facilities provide a challenging and realistic training environment crucial for maintaining preparedness.

Moreover, PTA has a long-standing mutual aid agreement with the County of Hawai'i, significantly enhancing emergency response capabilities in the region. PTA provides critical support within a 500-square-mile area across the Saddle Road region and responded to 121 emergency calls in 2022 alone. These included wildfires, motor vehicle accidents, lost hikers, and other emergencies—demonstrating PTA's indispensable role in protecting our community.



Hawai'i Island Chamber of Commerce

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Importantly, the retention of PTA is vital for the readiness of the Hawai'i Army National Guard and its continued support to civil authorities. Since its inception in 1852, the Hawai'i National Guard has played a pivotal role in disaster response and community safety—from the Sailor's Riot during the Kingdom of Hawai'i to more recent efforts like the Kīlauea eruption in 2018, the Hanapēpē and Wainiha floods, statewide COVID-19 response from 2020–2022, and the Lahaina wildfire in 2023. These operations required highly trained personnel, and PTA remains the premier location in the state where such mission-critical training can occur.

The Hawai'i Army National Guard's use of PTA dates back to 1950, when the 487th Field Artillery Regiment first surveyed the site for training. Today, PTA continues to serve as a key location where our Guard units develop the leadership, operational, and planning capabilities needed to respond effectively to natural disasters and other hazards across the state.

Beyond disaster readiness, PTA actively engages with the local community through events like Experience PTA Day, guided tours, school programs, public speaking engagements, and participation in parades. PTA also supports youth programs like Civil Air Patrol and Boys and Girls Club, and maintains active involvement in community organizations. These efforts have helped build trust and strengthen the relationship between PTA and the people of Hawai'i Island.

In closing, the Hawai'i Island Chamber of Commerce strongly supports the continued use of State-owned lands by the U.S. Army at Pōhakuloa Training Area. Its economic, emergency response, and community engagement contributions are irreplaceable, and its role in supporting our National Guard and first responders is crucial for ensuring the safety and resilience of Hawai'i's people.

Sincerely,

A handwritten signature in black ink, appearing to read "Carla Kuo". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Carla Kuo
Executive Officer
Hawai'i Island Chamber of Commerce

Aloha Members of the Board of Land and Natural Resources,

My name is Laken “Lake” Barber, a Hawai‘i Pacific University Alumni who lived and worked on Oahu during my undergraduate career. I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army’s lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka ‘Ōiwi. For over 60 years, the military has desecrated this ‘āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military’s historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the ‘āina. Reject the Final EIS.

Mahalo for your time and consideration,
Laken “Lake” Barber

California, USA

Dear BLNR Board,

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

The people must stand together in opposition to the federal government's demonstrated disrespect for Hawaiian land and water.

Mahalo,

Teresa Landreau

Mililani Town

Aloha kākou,

I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and to urge the land board to reject the Army's EIS. The Army has not demonstrated the capacity or will to serve as a proper steward of this land and the EIS fails to meaningfully address these concerns.

Military training activities of this scale are simply not compatible with conservation, cultural integrity, or aloha 'āina, and the State of Hawai'i has a kuleana to mālama 'āina as affirmed by the Hawai'i State Supreme Court in Kahalelio vs. DLNR, 2019. Depleted uranium in the soil at Pōhakuloa is also a risk to people of Hawai'i island, as it is consistently churned and aerosolized during live fire exercises and blown across the island. Not only are these exercises a danger to humans but they also endanger the native flora and fauna, which as you know, can only be found here in Hawai'i.

I strongly urge the members of the land board to reject the Army's FEIS for Pōhakuloa. Mahalo for considering my testimony.

Me ke aloha 'āina,

Kawena

Aloha Land Board Members,

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

While I am far away in Massachusetts, I know from my Hawai'iian neighbors the sacred importance of Pōhakuloa.

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

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

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

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

- Inadequate Environmental and Cultural Impact Analysis
- Lack of a sufficient plan to mitigate impacts to cultural and natural resources
- Concerns about depleted uranium on the site have gone unaddressed
- Military usage is incompatible with the conservation district designation

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

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

Sincerely,

Koby Leff

Greenfield, MA

Aloha e ka hui Board of Land and Natural Resources,

My name is Ka'āina Lewis. I am a member of the Armed Forces and a proud maka'āinana of Hilo. I REJECT the United States Army's final environmental impact statement to reclaim Pohakuloa.

Me ka ha'aha'a,

Ka'āina Lewis

Aloha Members of the Board of Land and Natural Resources,

My name is Katie Lu, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

[Katie Lu]

[Vancouver, British Columbia, Canada]

Aloha,

I'm writing to urge you, the decision makers of the BLNR, to reject the Army's final EIS for Pōhakuloa Training Area. For too long, has this ongoing abuse of our lands been allowed. We've witnessed time and time again how the United States military evades responsibility and accountability for the harm it causes to people, lands, and waters—especially here in Hawai'i.

How long are we going to continue allowing the illegal occupier to bomb, poison, and desecrate our 'āina? Enough is enough. Our keiki deserve more. Our kūpuna deserve more. We deserve justice.

Whoever reads this, know I am speaking from my heart to yours. We ALL must do what it takes to rebalance this world that is suffering—for our 'āina and our people that are suffering.

I pule that the people making this decision (a decision that will impact generations to come) will be guided, not by greed, not by a colonized/colonizer mindset, but by a profound knowing and understanding of the interconnectedness that binds the health of the 'āina to the health of kānaka.

Kū'e,

Kahelelani Mahone

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

I am writing to urge you to reject the Final Environmental Impact Statement (FEIS) submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island. This FEIS fails to meet the basic requirements of Hawai'i's environmental review laws and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—with no clear plan or commitment for cleanup.
- A failure to conduct comprehensive soil and groundwater testing, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.
- Lack of transparency, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.
- Failure to assess human health risks, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.
- No cumulative impact analysis of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.
- Acknowledged ongoing fire risks, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.
- Incomplete greenhouse gas data, while making unsupported claims about climate impacts.
- This FEIS does not meet the legal or ethical standards for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to reject this FEIS and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation

Sincerely,

Mau Ha

Aloha Land Board Members:

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

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

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

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

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

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

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

Mahalo for your time,

B. A. McClintock-REDAHI

Aloha,

I'm writing to urge you, the decision makers of the BLNR, to reject the Army's final EIS for Pōhakuloa Training Area. For too long, has this ongoing abuse of our lands been allowed. We've witnessed time and time again how the United States military evades responsibility and accountability for the harm it causes to people, lands, and waters—especially here in Hawai'i.

How long are we going to continue allowing the illegal occupier to bomb, poison, and desecrate our 'āina? Enough is enough. Our keiki deserve more. Our kūpuna deserve more. We deserve justice.

Whoever reads this, know I am speaking from my heart to yours. We ALL must do what it takes to rebalance this world that is suffering—for our 'āina and our people that are suffering.

I pule that the people making this decision (a decision that will impact generations to come) will be guided, not by greed, not by a colonized/colonizer mindset, but by a profound knowing and understanding of the interconnectedness that binds the health of the 'āina to the health of kānaka.

Kū'e,

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Aloha Land Board Members:

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

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Inadequate Environmental and Cultural Impact Analysis

Lack of a sufficient plan to mitigate impacts to cultural and natural resources

Concerns about depleted uranium on the site have gone unaddressed

Military usage is incompatible with the conservation district designation

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

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

Mahalo,

Alfredo G Moreno

Keaau, HI.

Aloha Chair Person Chang and fellow members of the board,

I am writing to ask that you reject the final EIS prepared by the US Military covering state lease lands.

The EIS does not adequately reflect the historic and ongoing harm that the military has inflicted on rare and endangered wildlife, particularly our native birds and rare invertebrates.

When the military first took possession of the lands in the 1950s, at least 12 species of native birds were known from the area. Today only three can be found with some regularity ('Apapane, 'Amakihi, and Pueo); three are rare ('Ōma'o, 'Akē'akē, and Nēnē); and the other six are likely extirpated ('Elepaio, 'I'iwi, Palila, 'Ua'u, 'Akiapōlā'au and 'Alalā). This is an unacceptable level of loss that has been perpetuated by the military, and is not given thorough weight in the EIS document.

These lands are also one of the last known locations for several species of native Kāhuli, and no surveys have been conducted by trained professionals in decades. This EIS does not even mention native snails. I strongly encourage the board to advise that the military contract Bishop Museum or another proficient organization to thoroughly survey and evaluate the impact of military activity on Kāhuli before any EIS be met with approval.

Mahalo for your time and consideration,

Bret Nainoa Mossman

Birds Hawai'i Past Present

Bret Nainoa Mossman

Aloha Members of the Board of Land and Natural Resources,

My name is Sarah Naone, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Sarah Naone

Wailuku, HI

My name is Noelani, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

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Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Noelani

Lincoln City, Oregon

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

My name is Yanelle, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

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Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Yanelle

[Sent from Yahoo Mail for iPhone](#)

Aloha Members of the Board of Land and Natural Resources,

My name is Alaka'i Nobriga, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi.

As a native Hawaiian it is not surprising that something like this is happening again. Many times before have we seen our lands we are supposed to care for and protect be used for things like profit or just being used carelessly. Sacred places I mind you. The EIS is simply not good enough, it has no real reason why the lease should be renewed ESPECIALLY after violating it by bombing, uranium depletion, and the like. It's obvious that the military does not know how to care for the land or be held accountable, so why should it be renewed.

Giving this land back to the military means we are further pushing native Hawaiians like myself back down the ladder of importance and treating us like we are not the ones who matter here. For 60 years they have desecrated our lands and gave little to no consideration to what they may be doing in the bigger picture. All for \$1.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Alaka'i Nobriga
Kailua, O'ahu

Aloha Members of the Board of Land and Natural Resources,

My name is Lily Hi'ilani Okimura, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

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I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Lily Hi'ilani Okimura

Mō'ili'ili, O'ahu, Hawai'i

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

The Army are destroyers, not shepherds.

It is time for you to step up for Hawaii and not for the illegal occupiers.

Mahalo,

Dennis O'Shea

Maui

Hello,

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

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

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

Sincerely,

Patti Packer

New York State

****Testimony Against the Military Extension of Pohakuloa Training Area****

Dear Members of the Committee,

I am writing to express my strong opposition to the proposed extension of the Pohakuloa Training Area (PTA) and the implications it carries for our community, environment, and future generations.

1. ****Environmental Impact****: The Pohakuloa Training Area is situated in a unique and sensitive ecosystem. The extension would lead to further degradation of native habitats, threaten endangered species, and disrupt crucial water resources. We must prioritize the preservation of our natural environment over military expansion.
2. ****Cultural Significance****: The land surrounding Pohakuloa is rich in cultural history and significance to Native Hawaiians. The extension would not only disrespect ancestral lands but also undermine the spiritual connection that many have with this area. It is our duty to honor and protect these cultural sites rather than allow them to be used for military exercises.
3. ****Community Health and Safety****: Increased military activity poses risks to the health and safety of the surrounding communities. The potential for accidents, noise pollution, and contamination of air and water resources cannot be overlooked. Our families deserve to live in a safe and healthy environment, free from the dangers associated with military training.
4. ****Alternative Solutions****: Rather than extending the PTA, I urge the committee to explore alternative solutions that do not compromise our environment or cultural heritage. Investing in community-based initiatives and sustainable practices can provide better returns for our society.
5. ****Public Opinion****: The voices of the local community must be prioritized. Many residents oppose the military extension, and their concerns deserve to be taken seriously. Engaging with the community and respecting their wishes is essential in making informed decisions that affect our lives.

In conclusion, I strongly urge the committee to reconsider the military extension of the Pohakuloa Training Area. We must prioritize environmental protection, cultural preservation,

and community health over military interests. Let us work together to find solutions that honor our land and people.

Thank you for your attention to this critical matter.

Sincerely,

Melanie Park, APRN-RX, AGACNP

Mauna Medics Healers Hui

Sent from my iPhone

Brian Piotrowski
98-715 Iho Place
Apartment 1201
Aiea, HI 96701

May 6, 2025

Esteemed members of the Board of Land and Natural Resources,

I am writing you to urge you not to accept the United States Army's Final Environmental Impact Statement ("FEIS") prepared for the Army Training Land Retention at Pōhakuloa Training Area (agenda item D1). The FEIS is insufficient in its analysis of the environmental and cultural impacts to this area of great importance. Not only is Pōhakuloa home to critical habitat for endangered species, it is also a wahi pana, a place sacred to Native Hawaiians.

I have several concerns with the FEIS, including but not limited to: the sufficiency of the environmental and cultural impact analysis; sufficiency of the mitigation plans for the impacts that are correctly identified; continuing dereliction of responsibility with respect to depleted uranium cleanup; propriety of military land use in the state conservation district; and BLNR's independent constitutional duty to both uphold the public trust doctrine and to protect Native Hawaiian traditional and customary rights. The Army, and the Department of Defense writ large, has consistently demonstrated its inability and/or unwillingness to do its part to protect and maintain the lands under its control and thus BLNR should not continue to give chances to these institutions, powerful as they are. In fact, BLNR has a constitutional obligation to reject the FEIS.

Please exercise your constitutional duty and reject the FEIS. Pōhakuloa deserves to be treated with respect and the Army has failed to do so. Thank you for soliciting public testimony and for your careful consideration of my testimony.

Sincerely,



Brian Piotrowski

Testimony in Opposition to the Lease Renewal of Pōhakuloa Training Area

Aloha kākou,

My name is Kay Raley and I submit this testimony in strong opposition to the U.S. Army's request to renew its lease of state lands at Pōhakuloa Training Area (PTA).

Pōhakuloa is a sacred and ecologically sensitive area that holds deep cultural, spiritual, and environmental significance to the people of Hawai'i. For decades, the Army has used this land for live-fire training exercises, resulting in the destruction of native ecosystems, contamination of the land, and the desecration of cultural sites. The Army's track record of stewardship does not reflect the care and respect that this land — and its rightful stewards — deserve.

The ongoing military presence at PTA has caused irreparable harm to cultural sites and endangered species, and it perpetuates the militarization of our islands, which stands in direct conflict with the values of aloha 'āina and mālama 'āina. Moreover, the Army has not demonstrated sufficient accountability or transparency in addressing community concerns, nor has it adequately mitigated the environmental damage already caused.

Renewing this lease would further entrench military occupation on lands that should be protected, respected, and restored — not bombed and desecrated. The land at Pōhakuloa should be returned to the people of Hawai'i for healing, restoration, and future generations.

I urge you to stand with the community, uphold the values of environmental and cultural justice, and reject the Army's lease renewal request for Pōhakuloa.

Mahalo for the opportunity to testify.

Sincerely,

Kay Raley

Waialua, O'ahu

5/5/25

Sent from my iPhone

Aloha,

My name is Talia Rios and I am a Native Hawaiian and a student at the University of Hawai'i and this email is to express my opposition of the U.S. Army's final environmental impact statement for the Pōhakuloa Training Area.

The US Army should not have access to or ownership of Pōhakuloa any further due to the irreparable damage they have caused to the landscape. The United States Army has historically damaged and contaminated Pōhakuloa. Their continued bombing practice has resulted in unexploded ordnance, depleted uranium, and toxic contamination in the area. This is desecration and complete disregard for Hawaiian land, and it should cease immediately for the protection of Pōhakuloa and the 'āina in general.

The military's continued occupation of this area disregards Native Hawaiian and community concerns for the protection of the area. The U.S. Military should not be able to extend its lease of Pōhakuloa, as they have done nothing but destroy the land and disregard Native Hawaiians. In the year of 2025, we should no longer be giving the US military access to Hawaiian land when they continuously mismanage and destroy it with no regard for the long-term impacts that the damage that has already been done will cause.

Continued bombing causes irreparable damage to the island's aquifers, endangered plants and animals, as well as air quality. Their presence and bombing practice should not be continued anymore to prevent even more damage from occurring. The military's EIS for lease renewal should not be accepted to prevent future use of the area.

As a young Native Hawaiian, I would like to see actions taken to protect and conserve the Hawaiian islands in modern times, rather than see the allowed continuation of US Military occupation and unnecessary destruction of Hawaiian land for the benefit of the United States Military. I truly believe that Hawai'i will be a better place if we take action to protect the 'āina from organizations that are only going to use and, quite literally, destroy the land rather than nurture and protect it. If the US Army has already historically destroyed the area, it makes no sense for them to continue to have access to the area and continue to take advantage of and destroy it some more. Their presence in this area (and many other

areas in Hawai'i) has already caused contamination and irreversible damage that will leave long-lasting consequences for future generations of Hawaiians. To prevent the damage from continuing further, please do not allow the US Army to occupy this space and reject their EIS to continue their lease. Pōhakuloa deserves to be protected from bombing practice.

Mahalo nui for the time and consideration for review of this testimony. Please keep Hawaiians in mind.

--

Mahalo,

Talia Kahākūka'alani Rios

Email: taliakr@hawaii.edu

She/Her

Aloha Land Board Members:

I am writing on behalf of the Green Party of Hawai'i to express our strong opposition to the United States Army's proposed retention of leased lands at Pōhakuloa Training Area.

When a lease is in place and it is not cared for it is revoked! The Green Party of Hawai'i urges the Land Board Members to openly reject the Army's EIS. The Army has not properly demonstrated the integrity to serve as a steward for this land , and the FEIS fails to address these concerns.

For ethical reasons alone this lease was a mistake when it was granted and now is the time to make amends and right the situation. The time has come to use the practice of Ho'oponopono to right the wrongs that have happened on this very sacred land. We as a people should be clearing the land of the toxic energy, negative impacts, and poisonous results of the Army's mismanagement . The land remembers, Pōhakuloa is a wahi pana.

As a sacred and storied place, Pōhakuloa is home to irreplaceable Native Hawaiian cultural sites and endangered species.

The Army has burned 20,000 acres of land , which includes critical habitat for native flora and fauna. This is a tragedy and unacceptable to the Green Party members and inhabitants of the Big Island of Hawai'i. The environmental contamination, with the continued use of live-fire and bombing , in the area raises Very Serious Concerns as to the pollution of both land and water. The Army knows the toxic nature of their use and they fail to clean up any of their mess. This is criminal!

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

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

The Green Party of Hawai'i urges the Members of the Land Board to respect the land .

The Green Party of Hawai'i urges the Members of the Land Board to respect the culture.

The Green Party of Hawai'i urges the Members of the Land Board to respect the people of Hawai'i, first and foremost by REJECTING the Army's FEIS for Pōhakuloa.

Mālama 'Āina, is the way forward. It is time for us to look to a future where we can be healing our mistakes and Ho'oponopono is a path forward.

With all due respect and best wishes,

Susan RobertsEmery

Green Party of Hawai'i

Paauilo

Aloha Land Board Members:

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

Although I do not live on your island it is important to keep land spaces on each island to be left as nature intended it. For too long have our safe natural spaces been taken over for human use, and usually it is not for good usage.

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

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

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

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

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

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

Sincerely,
Teje Roy

Kula/Makawao, Maui

Téjè Roy

Project Manager

Kipuka Olowalu

teje@kipukaolowalu.com

www.kipukaolowalu.org

****Please be patient with email replies I am usually out on property most days ****

Cell/Text:808-727-0899

Aloha Land Board Members:

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

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

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- Concerns about depleted uranium on the site have gone unaddressed
- Military usage is incompatible with the conservation district designation
- The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina

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

Sincerely,
Ann V Saffery
Honolulu, HI

Aloha BLNR Members:

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

I'm sure others more knowledgeable than me have made the important points about the specific cultural, environmental, and social problems regarding Pōhakuloa. I will not reiterate them.

I will, however, address the generic problems with the military in Hawaii, as I stated to Gov. Green in a letter I wrote to him in January 2024:

MILITARY. De-militarize Hawaii. Do not renew leases and close at least half of the military installations in Hawaii, starting with the ticking time bomb at Red Hill. I concede that our strategic location warrants a Navy, Air Force, and Coast Guard presence, maybe Barking Sands missile tracking station, but what do we need an Army base for? It might have made sense in the WWII era, but not now. It was a huge insult to Hawaii for the U.S. military to give back Kaho'olawe (without cleaning up the island and restoring its forest ecosystem) but then take an area of equal size at Pohakuloa. Auwe!

Kalakaua gave the Navy access to Pearl Harbor thinking that the U.S. military would protect Hawaii. The opposite has happened. The military is the most destructive force now active in Hawaii. Virtually every problem we face -- homelessness, pollution, environmental degradation, public health and safety, preservation of natural resources -- could be solved or mitigated by reducing the military presence. For those military bases that remain, the land lease cost should be huge. No dollar-a-year leases; the federal government should be paying the State billions for the privilege of trashing our precious and fragile place. (Same goes for Mauna Kea and other public lands put to private use.) Work with the Congressional delegation to divert military pork barrel into arts and education pork barrel. (I have made this point with Senator Schatz, whose father was a doctor, teacher, and patron of the arts; it wouldn't hurt to remind Brian of that.)

Abandoned military barracks could become homeless shelters. Already industrialized and polluted military bases could be converted to recycling centers, H-power plants, sewage treatment, or other unpleasant but necessary industries. No NIMBY problem here. Current civilian employees of the military could find more altruistic and ethical jobs in these industries.

Marsha Schweitzer

Honolulu

Aloha Members of the Board of Land and Natural Resources,

My name is Diane leilani shaw, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Diane Leilani Shaw

Honolulu, Hawai'i

Aloha Land Board Members:

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

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

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

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

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

Sincerely,

Kathy Shimata

Honolulu. 96822

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

I, as an early childhood educator, birthworker, and tender of 'āina, am writing to urge you to **reject the Final Environmental Impact Statement (FEIS)** submitted by the U.S. Army in support of its proposal to continue occupying 22,750 acres of public trust lands at the Pōhakuloa Training Area (PTA) on Hawai'i Island.

This FEIS **fails to meet the basic requirements of Hawai'i's environmental review laws** and does not provide the public or this Board with the information needed to make an informed, lawful decision. Rather than address valid concerns raised during the draft process, the Army's final document raises more red flags, avoids key questions, and withholds critical data.

Key issues that warrant immediate rejection include:

- Confirmed toxic contamination of state lands from lead, arsenic, petroleum compounds, and other munitions constituents—**with no clear plan or commitment for cleanup**. This is how the US Military has become the world's biggest point source polluter. They must repair the huge damage they have already caused. We are living in their poisons, as are babies and young children. We must do our best for future generations.

- A failure to conduct **comprehensive soil and groundwater testing**, despite known risks of contamination spreading through highly permeable soils and shallow aquifers.

We all need water. What we choose now will be remembered. Ola i ka wai!

- **Lack of transparency**, as the Army refuses to disclose Standard Operating Procedures it claims limit contamination.

- **Failure to assess human health risks**, especially for nearby communities and cultural practitioners with potential exposure to contaminated air, soil, and water.

- **No cumulative impact analysis** of the full 132,000-acre PTA operation, which artificially narrows the scope of environmental review.

- **Acknowledged ongoing fire risks**, with over 1,000 fires caused by military activities since 1975, threatening fragile species like the Palila.

- **Incomplete greenhouse gas data**, while making unsupported claims about climate impacts.

This FEIS **does not meet the legal or ethical standards** for protecting Hawai'i's lands, waters, ecosystems, or communities. It would be irresponsible for the Board to accept a document that sidesteps so many critical issues and puts future generations at risk.

I ask you to **reject this FEIS** and require the Army to conduct a full and lawful environmental review, with transparent data, community accountability, and a credible cleanup and mitigation plan.

Sincerely,

Allison Shiozaki

Ola'a/Mountain View, Hawai'i Island

andsoitgrows@gmail.com

Aloha BLNR Members:

We are writing to express our strong opposition to the U.S. Army's proposed retention of leased lands at the Pohakuloa Training Area, and to **urge the land board to reject the Army's Environmental Impact Study.**

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

The Federal EIS is insufficient and should be rejected on several grounds:

- Inadequate Environmental and Cultural Impact Analysis
- Lack of a sufficient plan to mitigate impacts to cultural and natural resources
- Concerns about depleted uranium on the site have gone unaddressed
- Military usage is incompatible with the conservation district designation

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

○

Mahalo for your time. We hope you will make the right decision to preserve Hawaii's aina.

John & Rita Shockley. Coordinators: Free Access Coalition

Aloha Land Board Members,

Accepting the environmental impact statement of the United States Army for the Pohakuloa Training Area is fundamentally at odds with the conservation of that land or any land.

The operation of the United States Army is inherently destructive; the organization is charged with destruction. By training at Pohakuloa, the United States Army practices desecrating foreign soil by desecrating Hawaiian soil.

I understand that I may garner more credibility by pretending that there is a commitment that I believe that the United States Army could make that would render their training at Pohakuloa acceptable, but at the risk of giving away my hand, I do not believe that there is and I believe that the United States Army's lease of the Pohakuloa training area must not be renewed for any price.

Still, this EIS is particularly egregious with minimal planning to mitigate impacts to cultural and natural resources both in Hawaii and abroad (though I recognize that protecting these sites abroad is not within the BLNR's mandate). The EIS does not address concerns about depleted uranium, and further, the existence of this uranium and its process of discovery yields minimal confidence that the United States Army can continue to steward this land in a just manner.

We cannot simultaneously bomb and conserve Pohakuloa.

Reject the United States Army's Pohakuloa EIS. Please.

Sincerely,

Jonathan Simonds

Hilo, HI

Aloha, Land Board Members!

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

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

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

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

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

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

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

Sincerely,

Dita Škalič

5 May 2025

Aloha Members of the Governor's Board of Land and Natural Resources,

I understand that you report to the State of Hawai'i Department of Land and Natural Resources.

I am WG Speed at 328 Ilimalia Loop. Kailua, Oahu since 1979.

BLNR should postpone decision on this in order to not preempt climate and sustainability priorities being developed at Departments' level now for Hawaii State's Priority Climate Action Plan (PCAP) and

Climate Action Pathway (CAP).

The state's priorities and path should then guide the structure and compliance expected in a revised FEIS by applicant Lessee : US ARMY

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

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

Concerns which will be clarified as stewardship requirements in PCAP and CAP for this and other lands leased by this state to the federal government's US DOD.

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

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

This FEIS is premature and insufficient.

- Inadequate Environmental and Cultural Impact Analysis
- Lack of a sufficient plan to mitigate impacts to cultural and natural resources
- Concerns about depleted uranium on the site have gone unaddressed

- Military usage is incompatible with the conservation district designation
- The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina

The Lessee should resubmit properly after PCAP and CAP are in place.:

I urge the members of the land board to reject this FEIS as premature.

Sincerely with *ha`aha`a* for your time, consideration, and worthy work.

William Goodwin Speed, Jr.

328 Ilimalia Loop, Kailua, Koolaupoko. O`ahu, Hawai`i

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

My name is Kekuawela Burgess Taula. I am from the moku o Wai'anae, and I am writing to express my strong opposition to the approval of the Army's Final Environmental Impact Statement (FEIS) for the Pōhakuloa Training Area (PTA).

The Army has admitted to widespread contamination, not just in the PTA, but anywhere they have touched in Hawai'i, including Mākua, my community's piko. Similarly, the Army cannot prove that this contamination has not spread into water or ecosystems—the army gatekeeps this information, as well as any safety procedures or spill data. They also delete critical information from their FEIS and other public access record(s). Fires, endangered species, and climate harms have been dismissed without evidence, and the FEIS they have submitted evades Hawaii law by ignoring very obvious cumulative impacts.

In today's political climate, where science is being dismissed daily, where federal dollars are being pulled based on wrongful agendas, and where the very idea of 'āina protections are being booted daily, I urge you to be on the right side of history. It is unacceptable and wrong that anyone gets to flit around laws and regulations that were created to protect our 'āina. These safeguards exist for a reason. Do not be the reason our Hawai'i is contaminated. Demand the Army clean up their mess, and rightfully restore the land to its natural state.

The approval of this FEIS does not reflect the will of Native Hawaiians, does not reflect your responsibility to the public trust of the water that feeds and provides for Hawai'i, and ultimately, does not reflect what is right.

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

Ke aloha 'āina,

Kekuawela Burgess Taula

Aloha Members of the Land Board:

Please accept this testimony in support of rejecting the Army's FEIS for Pohakuloa. I write this to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and to urge the land board to reject the Army's FEIS.

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

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

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

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

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

I ask the members of the land board to reject the Army's FEIS for Pōhakuloa. It's time to respect the land, the culture, and the people of Hawai'i and begin a real process of healing and restoration.

**With respect and aloha,
James G Trujillo
Kapa'a, HI 96746**

Aloha Land Board Members:

I love Hawai'i Island and I am in relationship with the land. The sound of the island breeze weaving through the palms as the Myna sings and jumps from one frond to the next is forever etched into my mind.

I love your Island and have spent a good amount of my hard earned dollar there. I got married in Kukio beach and my family lives in Honoka'a. My family and I had plans to go to Mau'umae on the day of the Lahaina fire. I don't think I need to tell you that the bridge one uses to drive to Mau'umae was burned down.

As we battle climate change, we must keep in mind that weather and fire events will only worsen. My wish is for no other Island, or Kanaka, to experience what Lahaina experienced. For these and many more reasons, I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at **Pōhakuloa Training Area**, and to **urge the land board to reject the Army's EIS**.

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

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- Concerns about depleted uranium on the site have gone unaddressed
- Military usage is incompatible with the conservation district designation
- The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina

I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by **rejecting the Army's FEIS** for Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration. Please hand the land back to the her real caretakers: The Kanaka.

Sincerely,
Alexandra Perez Urbina
Portland, OR

--

Alexandra Perez Urbina

A society grows great when old men plant trees whose shade they know they shall never sit in.

— **Greek proverb**

Aloha Members of the Board of Land and Natural Resources,

My name is Patricia Vethencourth, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,

Patricia Vethencourth.

Miami, Florida.

Aloha Members of the Board of Land and Natural Resources,

My name is Katharine Weida and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Katharine Weida
[Denver, Colorado, USA]

Sent from my iPhone

Aloha members of the Board of Land and Natural Resources,

I'm writing to state my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and to urge the land board to please reject the Army's EIS - war practice is untenable.

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

The Army's actions there have already resulted in the burning of nearly 20,000 acres, including designated critical habitat for native flora and fauna. This is totally unacceptable and cannot be considered a justified defense of our land or people. Additionally, ongoing live-fire training and bombing in the impact area raises serious concerns about environmental contamination, safety, and long-term degradation of both the land and water.

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

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

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

I urge the members of the land board to please respect the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration. Our planet cannot sustain any continued militaristic abuse.

Sincerely, Jeanne Wheeler

Island of Hawai'i

Aloha Land Board Members:

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

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

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

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

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

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

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

Sincerely,
Susan Wong
Kāne'ohe, O'ahu

Aloha members of the Board of Land and Natural Resources, I am writing to express my strong opposition to the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area, and to urge the land board to reject the Army's EIS. Pōhakuloa is not just a piece of land—it is a wahi pana, a sacred and storied place, home to irreplaceable Native Hawaiian cultural sites and some of Hawai'i's most endangered species. The Army has not demonstrated the capacity or will to serve as a proper steward of this land, and the FEIS fails to meaningfully address these concerns. For example, the Army's actions have already resulted in the burning of nearly 20,000 acres, including designated critical habitat for native flora and fauna. This is unacceptable. Additionally, the ongoing use of live-fire and bombing in the impact area raises serious concerns about environmental contamination, safety, and long-term degradation of both the land and water. Military training activities of this scale are simply not compatible with conservation, cultural integrity, or aloha 'āina. Enough is enough. The FEIS is insufficient and should be rejected on several grounds: - Inadequate Environmental and Cultural Impact Analysis - Lack of a sufficient plan to mitigate impacts to cultural and natural resources - Concerns about depleted uranium on the site have gone unaddressed - Military usage is incompatible with the conservation district designation - The approval of the EIS ultimately conflicts with the BLNR's constitutional duty mālama 'āina I urge the members of the land board to respect the land, the culture, and the people of Hawai'i by rejecting the Army's FEIS for Pōhakuloa. It's time to return these lands and begin a real process of healing and restoration. Sincerely,

Cydnee Yamamoto

Subject: Testimony Opposing Agenda Item Regarding Final EIS for Pōhakuloa Training Area – May 9, 2025

Aloha Members of the Board of Land and Natural Resources,

My name is Anne Borgen, and I am writing in strong opposition to the acceptance of the Final Environmental Impact Statement (EIS) for the Pōhakuloa Training Area and the proposed renewal of the U.S. Army's lease. I am a 2L JD candidate at the William S. Richardson School of Law.

Pōhakuloa is a conservation district, a wahi pana, and home to one of the last remaining sub-alpine tropical dryland ecosystems on Earth. It is also a sacred cultural landscape, holding spiritual and historical significance for Kānaka 'Ōiwi. For over 60 years, the military has desecrated this 'āina—bombing it, contaminating it with depleted uranium, sparking wildfires, and violating the terms of the original \$1 lease granted in 1964.

The Final EIS is grossly dishonest. It fails to fully acknowledge decades of environmental destruction, cultural harm, and community opposition. It assumes future compliance without reckoning with the military's historical neglect and repeated disregard for both state law and the county resolutions passed in 2008 demanding a halt to live fire and cleanup of existing contamination.

The courts have already ruled that the State has failed to care for this land. Approving this EIS and renewing the lease without proper accountability would not only violate your constitutionally obligated public trust responsibilities, it would enable further desecration of a place that should never have been used for war training in the first place.

History tends to repeat itself, especially when patterns are ignored. Kaho'olawe has stood as a paradox—sacred yet desecrated; remote, yet central to Native Hawaiian identity; quiet, but never silent. Revered as the kino lau of Kanaloa, the island holds profound cultural and spiritual significance as a navigational center for voyaging and site for religious and cultural ceremonies. Yet it also bears the deep wounds of colonization, having endured a long and violent history of abuse—first as a penal colony, then as overgrazed ranch land, and most destructively, by the U.S. Armed Forces for use as a live ordnance training area. Despite decades of devastation, Kaho'olawe remains a living testament to the destruction of land that the US military has caused Hawai'i, but most relevant here, the complete failure to have any regard for the environment. The island remains approximately 80% uncleared, with live ordinances, bullets, and other trash littered despite broken promises to clean it up. If Kaho'olawe is still in this state of destruction, why is the US military allowed to continue doing this elsewhere? History repeats itself, until enough is enough.

Beginning in 1976, the Protect Kaho'olawe 'Ohana (PKO) led a series of occupations to end the bombing and reclaim the island. They also filed a federal civil suit, seeking enforcement of environmental, historic preservation, and religious freedom laws. Since then, sacred sites have been rededicated, religious ceremonies revived, hiking trails cleared, and cultural-use areas re-established. PKO's advocacy ended military use of the island in 1990 and ultimately led to its formal return, held in trust by the State of Hawai'i, in 2003. Today, the Kaho'olawe Island Reserve Commission (KIRC) stewards the island as a natural and cultural reserve, dedicated to

the preservation of traditional and customary Native Hawaiian practices. The island is held in trust for future transfer to a sovereign Native Hawaiian entity. I submit that the BLNR should return Pōhakuloa Training Area to the people of Hawai'i, similar to what has been done with Kaho'olawe.

I urge the BLNR to reject the Final EIS and deny the lease renewal. Pōhakuloa is not a bombing range. It is sacred, and it is time for it to be healed, not further destroyed.

Please stand for the 'āina. Reject the Final EIS.

Mahalo for your time and consideration,
Anne Borgen
Makawao, Hi, 96768

Comments on Final Environmental Impact Statement for Army Training Land Retention at Pōhakuloa Training Area

To the Board of Land and Natural Resources:

RE: REJECTION OF THE FINAL ENVIRONMENTAL IMPACT STATEMENT FOR ARMY TRAINING LAND RETENTION AT PŌHAKULOA TRAINING AREA

As a veteran who served in the U.S. Army and personally trained at Pōhakuloa Training Area (PTA) from 1992 to 1994, and now as a long-time resident of Hawai‘i Island directly affected by decisions regarding this land, I am writing to strongly oppose the U.S. Army's proposed retention of leased lands at PTA and to urge the BLNR to reject the Army's Final Environmental Impact Statement (FEIS).

The U.S. military's request to extend its lease at Pōhakuloa must be viewed within the broader historical context of military contamination and desecration of Hawaiian lands. From the decades-long bombing of Kaho‘olawe that cracked the island's aquifer and left it still contaminated with unexploded ordnance despite \$400 million spent on cleanup, to the catastrophic Red Hill fuel storage facility leaks that contaminated the drinking water of 93,000 Oahu residents and forced the closure of critical water sources, the military has repeatedly demonstrated a disregard for environmental and cultural impacts of its operations.

The radioactive depleted uranium rounds used at PTA, dumping of steel drums containing radioactive waste off Oahu's shores, unexploded ordnance left in Waikane Valley and Makua Valley, and the designation of Pearl Harbor as an EPA Superfund site all follow the same disturbing pattern.

This history of broken promises and environmental negligence has severely damaged the trust of Hawai‘i's people, and the BLNR must evaluate the FEIS for Pōhakuloa with this legacy firmly in mind.

PERSONAL BACKGROUND AND STANDING

I write from the unique perspective of someone who has experienced PTA firsthand as a soldier and now lives not far from this military installation. During my service, I shot 8-inch howitzers at PTA that could fire large shells up to thirty miles. I lived at Schofield Barracks on O‘ahu and deployed to PTA for six-week training drills twice a year, where we lived in "hooches" at approximately 6,000 feet elevation. I have direct experience driving through the foot-thick dust that characterizes much of the training area, dust that we now know contains potentially harmful contaminants including depleted uranium.

As a current resident of Hawai‘i Island, I am among those who could be exposed to airborne contaminants from PTA, dependent on water sources that could be affected by military activities, and impacted by the cultural and environmental degradation of these lands. My dual perspective provides me with unique insights into both the military's operations and their impacts on the land, water, air, and people of Hawai‘i Island.

1. PROCEDURAL CONCERNS REGARDING PUBLIC COMMENT PERIOD AND REVIEW TIMELINE

First, I am deeply concerned about the procedural timeline established for this decision-making process. The BLNR has scheduled its decision-making meeting regarding the acceptance or non-acceptance of the Final EIS for May 9th at 9am, with public comments due by May 8th at 9am - just 24 hours prior. This extraordinarily compressed timeline raises serious questions about whether the BLNR and its staff could possibly review, analyze, and meaningfully consider what could be hundreds of substantive public comments in such a limited timeframe. It is obviously impossible to review in any serious way these comments in the 24 hours available.

The Hawaii Environmental Policy Act (HEPA) and its implementing regulations are built upon the fundamental principle that public participation is essential to sound environmental decision-making. **The purpose of soliciting public comments is to incorporate community concerns and expertise into agency decisions.** However, when there is only a 24-hour window between the comment deadline and the decision-making meeting, the comment process is reduced to a meaningless formality rather than a serious component of the review process.

This rushed timeline appears to violate the spirit, if not the letter, of HEPA's public participation requirements. It suggests that either:

1. The BLNR does not intend to thoroughly review public comments before making its decision, which would constitute a failure of the agency's responsibility to consider public input; or
2. The decision has effectively been pre-determined, rendering the public comment process a perfunctory exercise with no actual impact on the outcome.

Either scenario would represent a serious procedural defect in the environmental review process. A genuinely deliberative process would allow sufficient time - at minimum several days, but typically weeks - for agency staff to compile, analyze, and brief board members on the substance of public comments before any decision is made.

I respectfully request that the BLNR postpone its decision-making meeting to allow adequate time for thorough consideration of public comments, thereby fulfilling both the letter and spirit of HEPA's public participation requirements. Failure to provide adequate time for comment review could constitute a procedural deficiency that undermines the validity of any decision regarding the Final EIS.

LEGAL AND PROCEDURAL DEFICIENCIES

2. Breach of Existing Lease Terms and Trust Responsibilities

The current FEIS fails to adequately address the Army's documented non-compliance with existing lease terms. The 65-year lease agreement stipulates that the Army is required to "make every reasonable effort to remove or deactivate all live or blank ammunition upon completion of a training exercise or prior to entry by the said public, whichever is sooner." Yet as established in

court proceedings (*Kahaulelio v. DLNR*), DLNR could not provide records demonstrating that the Army was complying with these conditions.

In April 2018, First Circuit Court Judge Gary Chang ruled in favor of plaintiffs *Kahaulelio and Ching*, noting the state's failure to "mālama 'āina." The court found that DLNR had breached its trust duties by failing to conduct inspections to ensure the lands were not harmed by the Army. Judge Chang's ruling explicitly stated that "The Defendants would further breach their trust duties if they were to execute an extension, renewal...or enter into a new lease of the PTA, without first determining (in writing) that the terms of the existing lease have been satisfactorily fulfilled, particularly with respect to any lease provision that has an impact upon the condition of the Pōhakuloa leased lands."

The Hawai'i Supreme Court upheld this ruling in August 2019. To date, there is no evidence that DLNR has developed the court-ordered management plan for PTA or determined in writing that the terms of the existing lease have been satisfactorily fulfilled. Approving the FEIS without addressing these court-mandated requirements would constitute a continued breach of trust and potentially violate the court's order.

3. Inadequate Environmental Review and Impact Analysis

The FEIS acknowledges that under Alternatives 1, 2, and 3 (all retention options), "significant adverse impacts could occur on land use (land tenure), biological resources, cultural practices, and environmental justice." However, it fails to provide adequate mitigation measures for these acknowledged significant impacts.

The FEIS does not sufficiently address cumulative impacts from 75 years of military use, nor does it adequately assess the full range of contaminants present at PTA, including:

- Depleted uranium from Davy Crockett nuclear weapon system spotting rounds fired in the 1960s
- Heavy metals from decades of munitions use
- Perchlorate and other propellants
- Unexploded ordnance
- Chemical and biological warfare training agents

The FEIS also fails to properly evaluate the potential for these contaminants to migrate through air, soil, and water to surrounding communities and ecosystems. Given that PTA sits above a major aquifer at 4,500 feet elevation - described as "one of the most pristine aquifers in Hawai'i" - this represents a serious deficiency in the analysis.

4. Incompatibility with State Land Use Designation and Constitutional Obligations

The lands at PTA are zoned for conservation and include critical habitat for numerous threatened and endangered species. Under HRS Chapter 205, conservation districts are defined as areas necessary for "protecting watersheds and water sources; preserving scenic and historic areas; providing park lands, wilderness, and beach reserves; conserving indigenous or endemic plants,

fish, and wildlife..." Military live-fire training is fundamentally incompatible with these conservation purposes.

Article XI, Section 1 of the Hawai'i State Constitution mandates that "All public natural resources are held in trust by the State for the benefit of the people." This public trust doctrine imposes upon the State a fiduciary duty to protect and preserve natural resources for present and future generations. The continued use of conservation lands for military bombing and live-fire training directly contravenes this constitutional obligation.

SUBSTANTIVE DEFICIENCIES

5. Environmental Contamination and Public Health Risks

The presence of depleted uranium (DU) at PTA represents one of the most serious unaddressed concerns in the FEIS. In 2007, the U.S. Army confirmed that DU spotting rounds had been fired at Pōhakuloa in the 1960s as part of the Davy Crockett nuclear weapon system training.

The half-life of DU is 4.5 billion years. When DU rounds explode, uranium settles onto the ground and becomes aerosolized, meaning it can be inhaled and carried on winds. Current live-fire exercises that disturb the soil can cause radioactive DU to be re-aerosolized and blown across the island, potentially exposing residents to radiation through inhalation.

According to information shared by Jim Albertini, a long-time social justice activist, inhaled DU alpha particles travel through the lymph system causing cancers and other diseases. DU exposure can also affect a person's DNA and cause genetic damage that will be passed down to future generations.

In July 2008, the Hawai'i County Council passed Resolution 639-08, which called for "a complete halt to B-2 bombing missions and to all live firing exercises and other activities at the Pōhakuloa Training Area that create dust until there is an assessment and clean up of the depleted uranium already present." This resolution has been ignored, and the FEIS does not adequately address these concerns or propose sufficient mitigation measures.

6. Cultural Desecration and Impacts on Traditional Practices

Pōhakuloa is a wao akua (godly realm) and wahi pana (sacred place) with profound cultural significance. The FEIS fails to adequately assess the cultural impacts of continued military use or to propose meaningful mitigation measures for the acknowledged "significant adverse impacts" on cultural practices.

Cultural practitioner E. Kalani Flores, who served on the U.S. Army's PTA cultural advisory committee, has identified Pu'u Koli as the energetic piko (center) of Hawai'i Island - a critical intersection of energy lines within the earth where ancestors would walk to maintain balance between spiritual and physical realms. Flores explains that military activity at Pōhakuloa is "creating and inflicting an energy of killing and war and everything associated with it" at the center of the island.

The FEIS does not meaningfully address these cultural impacts, nor does it adequately consider the traditional knowledge of cultural practitioners regarding the sacred nature of Pōhakuloa. The alternatives presented all involve continued military use that would perpetuate cultural desecration.

7. Endangered Species and Biological Resources

PTA includes a portion of the last remaining sub-alpine tropical dryland ecosystem in the world. It is home to many rare, native species of plants and animals, including nearly two dozen endemic threatened or endangered plant species such as the pamakani (*Tetramolopium stemmermanniae*).

The FEIS acknowledges that significant adverse impacts to biological resources would occur under all retention alternatives but does not provide sufficient mitigation measures. Past military activities have already resulted in the burning of nearly 20,000 acres, including designated critical habitat for native flora and fauna. The continued use of live-fire and bombing in the impact area poses an ongoing threat to these irreplaceable biological resources.

8. Environmental Justice and Indigenous Rights

The FEIS acknowledges significant adverse impacts on environmental justice under all retention alternatives. However, it fails to adequately address how these impacts could be mitigated or how they relate to broader patterns of land appropriation and environmental degradation affecting Native Hawaiians.

As noted by community advocate Maxine Kahaulelio, "The military is even using our Hawaiian home lands – Mākua, Bellows, Pōhakuloa – while our people wait 40 years on the waiting list. How much more are they going to take from us?" This comment highlights the disproportionate burden placed on Native Hawaiian communities by military land use in Hawai‘i.

The FEIS does not adequately consider these equity issues or the historical context of military land acquisition in Hawai‘i. It also fails to address the United Nations Declaration on the Rights of Indigenous Peoples, which establishes standards for the treatment of indigenous lands and resources.

9. Water Resources and Aquifer Protection

The FEIS inadequately addresses potential impacts to the massive aquifer located directly beneath Pōhakuloa at an elevation of 4,500 feet. Cultural practitioners Craig Neff and Luana Palapala Busby-Neff have expressed deep concern about this aquifer, describing it as "one of the most pristine aquifers in Hawai‘i" and noting that it is "the deepest, it's the widest, and it's part of the historical, cultural, and spiritual significance of this land base."

The potential for contamination of this aquifer from seven decades of military training, including the use of depleted uranium, heavy metals, and other munitions constituents, represents a serious

long-term threat to water resources on Hawai‘i Island. The FEIS does not adequately assess these risks or propose sufficient protections for this critical water resource.

ALTERNATIVES AND RECOMMENDATIONS

The Army's stated purpose and need for the proposed action is overly narrow and predetermines the outcome in favor of continued military use. A truly objective environmental review would consider a wider range of alternatives, including:

1. Complete restoration and return of all leased lands to the State of Hawai‘i, with the U.S. military taking full responsibility for thorough environmental remediation before return.
2. Transitioning to simulation-based training and other non-live-fire alternatives that would reduce environmental impacts while still meeting military readiness requirements.
3. Developing a comprehensive management and restoration plan for PTA that involves meaningful co-management with Native Hawaiian cultural practitioners and conservation experts.
4. Phased reduction of military activities at PTA with concurrent restoration efforts, prioritizing areas of high cultural and ecological value.

The BLNR should reject the FEIS and direct the Army and DLNR to develop a new approach that:

1. Complies with Judge Chang's ruling by demonstrating that the terms of the existing lease have been satisfactorily fulfilled before considering any lease renewal.
2. Provides a thorough assessment of all contamination at PTA, including depleted uranium, and develops a comprehensive remediation plan.
3. Respects the cultural significance of Pōhakuoloa and incorporates meaningful input from cultural practitioners in future land management decisions.
4. Prioritizes the conservation values of the land as required by its state land use designation and the state constitution.
5. Addresses environmental justice concerns by reducing the disproportionate impact of military activities on Native Hawaiian communities.

CONCLUSION

As both a veteran who trained at PTA and a current resident of Hawai‘i Island, I have a unique perspective on the issues at hand. The U.S. military's continued use of Pōhakuoloa represents a perpetuation of environmental degradation, cultural desecration, and injustice that cannot be justified by national security claims.

The FEIS fails to meet basic legal requirements, does not adequately address court-mandated obligations, and ignores fundamental environmental, cultural, and justice concerns. It represents a continuation of the state's breach of trust regarding these lands and does not fulfill the Army's responsibility to thoroughly assess alternatives and impacts.

I urge the BLNR to fulfill its constitutional duty to mālama ‘āina by rejecting the Army's FEIS and beginning a new process that prioritizes genuine stewardship of these lands for present and future generations.

Respectfully submitted,

Tam Hunt

A handwritten signature in black ink, appearing to be 'TH', is written above a horizontal line.

Keaau, Hawaii

May 5, 2025