

PROTECT KAHO‘OLAWE ‘OHANA
1733 Wili Pa Loop, B-1
Wailuku, Hawai‘i 96793



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Naval Facilities Engineering Systems
Command Pacific/EV22
Attention: PMRF LBT EA Project Manager
258 Makalapa Drive, Suite 100
Pearl Harbor, HI 96860
PMRF-LBT-EA-Comments@us.navy.mil

Re: Full PMRF Environmental Impact Assessment is Necessary for Ka‘ula Island

To the PMRF LBT EA Project Manager:

[The Protect Kaho‘olawe ‘Ohana](#) (‘Ohana) believes the draft Environmental Assessment (EA) for expanded military activities at the Pacific Missile Range Facilities (PMRF) and Ka‘ula Island does not accurately or adequately assess the impacts that increased military exercises will have on Ka‘ula Island, the local environment and marine resources surrounding the island. The draft EA is also deficient in its Cultural Impact Assessment. A full Environmental Impact Study (EIS) is necessary.

The ‘Ohana is a grassroots nonprofit organization dedicated to healing Kaho‘olawe after nearly 50 years of direct bombing abuse by the U.S. Navy. The ‘Ohana also works to protect the natural and cultural resources of our ancestral lands and ocean waters of the Hawaiian archipelago. Kaho‘olawe and Ka‘ula share a similar plight. Both are sacred sites of irreplaceable cultural significance to the Native Hawaiian people that were wrongfully taken by the U.S. military for live-fire use. In fact, it is unclear how the U.S. military could move forward with its illegal use of Ka‘ula for live-fire ordnance training purposes until the all-important question of ownership of the island is resolved. We understand that the state Department of Land and Natural Resources has asked the state Attorney General to opine on ownership of Ka‘ula.

1) The cultural analysis in the draft Environmental Assessment is deficient. The draft EA incorrectly assumes there are no historic sites or Hawaiian cultural practices that will be impacted. That is not true. One important site on Ka‘ula is Lua o Kuhaimoana (Cave Dwelling of the shark akua Kuhaimoana), commonly known today as Shark Cave. The presence of sharks and other animals such as seabirds in these waters indicate that Ka‘ula is a critical haven for marine and terrestrial life. The surrounding waters of Ka‘ula are traditional sea lanes that are well-traveled for spiritual and physical subsistence by Native Hawaiians of Ni‘ihau, Kaua‘i, and the broader Hawai‘i communities.

In addition to the historic cultural sites and resources on Ka'ula that are threatened by military training and exercises, Ka'ula holds cultural and religious significance to Native Hawaiian people as an island inhabited by birds and marine life who are *kinolau* (physical body forms) of Hawaiian Gods, and *'aumakua* or guardians to particular families. As the late Dr. Noa Emmett Aluli, a founder of the Protect Kaho'olawe 'Ohana, said, "The health of the land is the health of the people is the health of the nation." Native Hawaiians understand that the health of people is dependent on the health of the land. When the land and waters of a culturally and spiritually significant place such as Ka'ula are assaulted, Native Hawaiians are injured.

The draft EA is also deficient in its analysis of the cumulative effects of continued and increased training and bombing of Ka'ula. The Council for Environmental Quality (CEQ) regulations identify factors to consider in measuring the intensity of potential impacts. The U.S. Navy's proposal to increase bombing on Ka'ula, requires an in-depth assessment of the cumulative effects of 70 years of bombing and target practice on Ka'ula, as well as sustained military use, bombing and pollution on multiple sites throughout Hawai'i. The profound disconnection of Native Hawaiians from lands and waters under U.S. military jurisdiction continues to have lasting negative and generational impacts on the health and well-being of the indigenous peoples of Hawai'i Nei.

2) The U.S. Navy should clean up Ka'ula and implement the Biden Administration's Memorandum jointly issued by CEQ and the Office of Science and Technology Policy (OSTP) to elevate indigenous knowledge in all federal policy decisions on this matter so that we can ensure vitality to our island lifeways. The state-designated Seabird Sanctuary of Ka'ula is scattered with remnants and fragments of bombs amongst one of the most important seabird nesting sites in the archipelago. Ka'ula is not a far, desolate remote island that is disconnected from our communities. The action being proposed in the draft EA would erode the integrity of a critical conservation and cultural site that sits at the gateway of the marine corridor between the high-islands in the southwest portion of the archipelago and the older, ancestral islands and waters of Papahānaumokuākea Marine National Monument. Ka'ula's health and vitality have profound implications on the health and vitality of marine and seabird life in Hawai'i.

A full environmental impact statement will reveal the significant and damaging impact on the natural and cultural resources of Ka'ula. We urge the U.S. Navy to provide good stewardship of Ka'ula rather than expand the direct destructive impact upon the island. This path forward will allow our island ecosystems to survive and thrive and enable our communities to focus on the challenges of climate variability, biodiversity loss, and cultural erosion with a resiliency and resolve that facilitates a long-term quality of life for the people of Hawai'i.

Aloha 'Āina,



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