

## **Testimony to BLNR to REJECT (not Accept) the Final EIS on Pogakuloa**

**May 6, 2025**

**From Jim Albertini, President of Malu 'Aina Center for Non-violent Education & Action**

P.O. Box 489 Ola'a (Kurtistown) Hawai'i 96760

Phone 808-966-7622 Email [ja@malu-aina.org](mailto:ja@malu-aina.org) Visit us on the web at [www.malu-aina.org](http://www.malu-aina.org)

Aloha BLNR members,

Our organization, Malu 'Aina, is strongly opposed to any further bombing and desecration at Pohakuloa. We urge you to REJECT the Final EIS on Pohakuloa that is extremely deficient in a number of areas.

1. Pohakuloa is classified as a State Conservation District, the highest protected land status. Bombing, shelling and military pollution are not compatible land uses in a conservation district. It's a no brainer! The full extent of military destruction at Pohakuloa has not been thoroughly investigated.
2. The Final EIS inadequately addresses concerns for protection of endangered plant and animal species at Pohakuloa, and with Trump's environmental budget cuts it appears protection of endangered species will be further trashed.
3. The military record of environmental contamination and failed cleanup in Hawaii is staggering. Tens of millions of live rounds from a wide variety of weapons systems have been fired from the lease lands firing points into the Federally seized (not owned) lands of the 51,000 acre impact area. The military didn't even pay 1 cent for the 84,000 acres of Hawaii crown and government lands seized by a Presidential executive order in 1964 under President Lyndon B. Johnson. Our organization has documented 57 present or former military sites on Hawaii island totaling more than 250,000 acres of military contamination. The present PTA commander LTC Timothy Alvarado has the gall to say " We (the military) are stewards of the land." Please list all the various weapon systems fired into the PTA impact area and the number of rounds fired over 80 plus years.
4. The military cultural impacts and environmental assessments are superficial and insufficient. The US military has been bombing and shelling Pohakuloa for more than 80 years, and yet more than half of Pohakuloa hasn't had an assessment survey of cultural and historic sites. What does that tell you?

5. The increasing fire risk at PTA is inadequately addressed. Pohakuloa is a dry windy area in the center of Hawaii Island. The Final EIS says that military bombing and shelling has started 1261 wildfires at PTA since 1975. It also notes that prior to 2012 data is incomplete so the number of fires could actually be higher. The final EIS also says that the wildfire risk will only be increasing in the future due to more and more extremes of climate change. One fire started on PTA in 2022, a year before the Lahaina fire, burned more than 12,000 acres off the base destroying endangered species habitat.

6. The Army completely understates the quantity of Depleted Uranium (DU) weapons fired at PTA and the Hazards. The EIS states 400 DU spotting rounds for the Davy Crockett Nuclear weapon system. Army Hawaii Garrison Colonel Howard Killian testified before the Hawaii County Council in 2008, that based on the number of people certified to fire the Davy Crockett weapon system at PTA, TWO THOUSAND DU spotting rounds were fired at PTA. This is after years of denial by the Army that any DU was fired at PTA. It is likely that additional DU penetrating rounds were also fired at PTA. Col. Killian testified that DU was not prohibited from being used in training until 1996. DU has a half life of 4.5 Billion years and when DU metal is hit with high explosives it burns and turns into DU oxide particles that can be carried long distances in the wind. Dr. Lorrin Pang, MD, listed in the top 3% of America's best doctors, who spent 25 years in the Army medical corps has stated that inhaling DU oxide particles is the most deadly form of radiation. It can travel through the lymph system causing various cancers. It also causes birth defects and even genetic damage passed to future generations. Dr. Pang has said that Pohakuloa should be ringed 360 degrees with proper air filters for a full year to really see what toxins are coming off the base.

7. DLNR Staff K. Tiger Mills of Office of Conservation and Coastal Lands notes in a letter dated April 30, 2025 (HA 25-173) additional information the Final EIS should address, including --

A. A response to the Hawaii County Council regarding Resolution 639-08 based upon comments our organization and others raised in the draft EIS process

B. Additional discussion on the rare environmental setting on the high-elevation sub-alpine tropical dryland ecosystem.

C. A complete inventory of archeological sites that have been or may be impacted by military training.

8. Comments by DLND staff Ryan Okano, Division of Aquatic Resources, April 29, 2025 about impacts to aquatic resources that need to be addressed.

9. PTA base commander LTC T. Alvarado has refused to participate in public town hall forums on Pohakuloa. See press release below of Oct. 1, 2023

**An invitation to PTA Commander LTC Tim Alvarado to speak and answer questions at a public meeting**

**FOR PUBLIC RELEASE** Oct. 1, 2023

Mailed to:

Pohakuloa Training Area (PTA) Commander

LTC Tim Alvarado

PO Box 4607, Hilo HI 96720

also emailed to

Amy Phillips

PTA PAO to be delivered to LTC Alvarado

Phillips, Amy CIV USARMY USAG (USA) <[amy.phillips.civ@army.mil](mailto:amy.phillips.civ@army.mil)>

Aloha LTC Alvarado,

Our organization hosts public community meetings on the 2nd and 4th Mondays of the month at the Kea'au Community Center from **6-8 PM.**

We would like to invite you to come and make a presentation about PTA and respond to community concerns. Our proposed possible meeting dates for you are **Monday Oct. 23rd or Nov. 13th.** If neither of these dates are good for you please propose a better date (2nd and 4th Mondays of the Month).

Some community concerns expressed about PTA include the following:

1. What possible toxins are blowing in the dust, wind, and smoke off PTA from more than 75 years of bombing and shelling, including the use of Depleted Uranium (DU) radiation

rounds at PTA? It has been suggested that an independent authority install air filters 360 degrees surrounding the base at government expense to see what might be coming off the base. What is your evaluation of PTA's lack of response to Hawaii County Council's resolution 639-08 passed in July 2008 by a vote of 8-1 calling on 8 actions to be taken by PTA. (Copy enclosed with letter sent to PO Box 4607, Hilo HI 96720)

2. There are growing concerns about spreading wildfires started at PTA from bombing and shelling. Is PTA, located in the dry, windy center of Hawaii Island, our "Lahaina" fire waiting to happen?

3. There are growing concerns, in light of Military Red Hill fuel contamination of the the aquifer on Oahu about toxins from PTA possibly contaminating the drinking water of Hawaii Island. Were military toxins found in the two water wells drilled at PTA 10 years ago? Were the water wells tested for a wide range of military toxins? Why aren't those wells being used by PTA instead of paying \$2 million yearly to haul water to PTA?

4. What are the military plans for clean up of all the Unexploded Ordnance (UXO) and other toxins on the entire 133,000- acres of PTA? I note that maps of PTA say "All of PTA should be considered a Dud Hazard Area."

5. It's been reported that less than half of PTA has been surveyed for cultural sites. Why the delay in doing cultural surveys for the entire base?

6. There are growing community concerns about not renewing or canceling the State lease of 23,000 acres for 65 years at a total cost of \$1 and the rescinding of the US presidential executive order in 1964 that seized 84,000 acres of Hawaiian crown and government lands indefinitely for zero costs.

7. What are the current number of live-rounds, and listing of all the various types of rounds, fired at PTA. Is it 15 million, 20 million, 25 million? The last figure I believe released about 20 years ago noted 14.8 million live rounds fired annually at PTA. What other rounds, besides live rounds, have been fired at PTA?

The above are just some of the concerns I have heard expressed in the community. There will no doubt be many others, but these are starters.

We will be grateful for your attendance and addressing these questions and others in a mutually respectful gathering. Mahalo.

Sincerely,

Jim Albertini, president of Malu 'Aina

cc: general public, elected officials, news media

**10. On page 11 of the 32 pages of the DLNR staff executive summary Discussion, it states: The final EIS does not "fully declare the environmental implications of the proposed action," and that the Board has not been given the "full range of responsible opinion on environmental effects." It further states that this issue has been consistently raised since the first draft EIS.**

**I rest my case. Bombing and shelling desecrates cultural and historic sites at PTA. Polluting the air, land, and water with deadly toxins is Desecration. Make the military clean up its toxic mess and return the lands to the Hawaiian people.**

**Reject do not Accept the Pohakuloa Final EIS**

**Jim Albertini**

**5/6/25**

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Jim Albertini Malu 'Aina Center For Non-violent Education & Action P.O. Box 489 Ola'a  
(Kurtistown) Hawai'i 96760

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May 5, 2025

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.”

I know you know this. You can’t help but know this if you are island born and raised or if you have lived in the Islands for any length of time. We are so fortunate to have the Hawaiian creation story to teach us to respect the land and waters here. Also, straight out of Google, here is what the Native People of the Mainland United States believe: “Common themes in American Indian creation stories include the emergence of the world from chaos, the importance of balance and interconnectedness with nature, and the role of spiritual beings or heroes in shaping the world. Many stories also highlight the origins of humans and animals, as well as emphasizing the importance of respecting the natural world and maintaining harmony within the community.” Mainland America was given a playbook on how to mālama “America” by the original inhabitants that had a connection to nature and the “heavens”. As were you, Land Board Members, who are and are not of the blood, from your kupuna and from the books.

How dare I lecture you. Yes, me too, I think, “Shut up, Audrey. Stay invisible. No make waves.”

But as I get older (I am 76) it hurts me more and more that the land and waters are being disrespected. I mean hurt. Pain begins in my heart and radiates to my fingertips.

“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.”

Thank you for your service. Respectfully, Audrey Allencastre, Ha‘ikū, Maui

**From:** [Hollie Bearden](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Please Deny  
**Date:** Tuesday, May 6, 2025 2:17:51 PM

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Please deny the US Military final EIS.

The land is sacred. WE MUST SAY NO or it will NEVER END. PLEASE say NO for the sake of the land, the future and our keiki who cannot ever get back what we allow to be destroyed.

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Hollie Bearden

**From:** [Pono Cummings](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] REJECT  
**Date:** Tuesday, May 6, 2025 2:07:07 PM

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Aloha,

My name is Pono Cummings from Honolulu, Oahu. I would like to REJECT the Army's final environmental impact statement (EIS) for the Pohakuloa training Area (PTA) because the cultural, environment, and health concerns are too great.

Mahalo,  
Pono

**From:** [Loke Davis](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Cc:** [Loke Davis](#)  
**Subject:** [EXTERNAL] Testimony to REJECT U.S. Military EIS on Pōhakuloa  
**Date:** Tuesday, May 6, 2025 2:30:37 PM

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Aloha,

I am testifying AGAINST the re-leasing of Pōhakuloa to the US Military and call on the BLNR to REJECT the US Military's EIS. The habitual bombing of Hawai'i Island's largest aquifer over the last 70 years is unacceptable and it is the DLNR's responsibility to protect this natural resource. I am asking the BLNR to uphold their duty and hold the US Military accountable for all activities that have negatively impacted the area and for which the US military, contrary to what may be depicted in the EIS, has not taken responsibility for. I want to emphasize the magnitude of impact that this decision will have not only in our present time, but for generations to come.

Mahalo,

**Loke Davis**

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**From:** [Dale Evans](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa  
**Date:** Tuesday, May 6, 2025 2:10:38 PM

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As a citizen of Hawaii, I urge the Board to apply the strictest degree of scrutiny regarding the EIS submitted by the military. As a citizen of Earth, I urge you to take whatever steps are necessary to rid the island of Hawaii of this desecration of the aina. The military is not a good neighbor nor a benevolent occupying force. It's time to get them out of this lease and eliminate further opportunity for their irresponsible, destructive actions.

Sincerely,  
Dale Evans  
Waimanalo

To Whom it May Concern,

Aloha, I am writing to provide testimony that urges the BLNR to reject the US Military's proposed EIS and intentions to lay further waste to Pohakuloa.

Though I was not born nor raised in the Kingdom of Hawaii, and though I have no ancestral ties to the 'aina, I am a passionate advocate for the protection of these lands. Hawaii is a site of modern colonization. The people who were born and raised here, who do have ancestral ties to the 'aina, have been systematically oppressed. To continue to bomb, destroy, and desecrate this land is to continue a pattern of colonial destruction. The priority of agencies like the BLNR should not be to improve the financial gains of the military industrial complex. The BLNR has a responsibility to conserve, protect, and restore natural resources. The more our natural resources are treated as expendable, the more deprived we will become as a society. There must be an incentive to allow lands and resources to flourish, rather than sell them to the highest bidder at the expense of future generations and cultural ignorance.

I wish to convey my position with both urgency and respect. Thank you for your time and consideration.

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Thank you,

*Lauren Faue*

(she/her/hers)

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 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 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,  
Serafina Gajate

Hawai'i Island

Sent from my iPhone

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Sincerely,  
Emily Gambino

Dear Senators and others

Hawai'i was pristine and beautiful in the past, and my dream is that one day, Hawai'i will be returned to that magic enchanted isle that was, but even better, stronger, and happier. To get there, some steps are needed - Big Island is desecrated and damaged now, as you will see from Jim's passionate writing, but a clean up could help. That would be a start, not a full answer. But a start is a new and needed beginning and I hope that the authorities, military and civilian, Native Hawai'ian and others, will take on the responsibility for creating a clean, wholesome, healthy environment and endeavour to change the existing dangerous mess into an environmental monument for all peoples. Join in seeking a rejection of the Final EIS and move to begin renewal and refresh the potential of Big Island . . .

Mahalo and thank you - bob g (7 May 2025)

----- Forwarded message -----

From: **jim albertini** <[jimalbertini@gmail.com](mailto:jimalbertini@gmail.com)>

Date: Wed, May 7, 2025 at 11:44 AM

Subject: [Malu Aina Peace Ohana] Testimony to BLNR to REJECT (not Accept) the Final EIS on Pogakuloa

To: Peace ohana google group <[big-island-peace@googlegroups.com](mailto:big-island-peace@googlegroups.com)>

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We will be grateful for your attendance and addressing these questions and others in a mutually respectful gathering. Mahalo.

Sincerely,

Jim Albertini, president of Malu 'Aina

cc: general public, elected officials, news media

**10. On page 11 of the 32 pages of the DLNR staff executive summary Discussion, it states: The final EIS does not "fully declare the environmental implications of the proposed action," and that the Board has not been given the "full range of responsible**

**opinion on environmental effects." It further states that this issue has been consistently raised since the first draft EIS.**

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**5/6/25**

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You received this message because you are subscribed to the Google Groups "Malu Aina Peace Ohana" group.

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To view this discussion visit <https://groups.google.com/d/msgid/big-island-peace/d402ba77-601a-ceae-f154-5dbcf80880d0%40gmail.com>.

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"Each time a man stands up for an ideal, or acts to improve the lot of others, or strikes out against injustice, he sends forth a tiny ripple of hope, and crossing each other from a million different centers of energy and daring, those ripples build a current which can sweep down the mightiest walls of oppression and resistance."

Robert F. Kennedy  
Capetown, June 6th 1966

Pacific still means peace,

bob gregory

Item D-1 is the acceptance or non-acceptance of the final EIS for the Army training land retention at Pohakuloa Training Area.

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

I write to you today in *firm opposition* to the U.S. Army's Final Environmental Impact Statement (FEIS) and its proposed retention of leased lands at the Pōhakuloa Training Area.

We have seen this before. We stopped the bombing of Kaho'olawe—but only after decades of destruction and protest. And even then, after the U.S. government allocated nearly \$450 million for cleanup, less than 10% of Kaho'olawe's 26,000 acres were actually cleared of unexploded ordnance. That is a devastating precedent.

Now consider this: Pōhakuloa spans over **130,000 acres**—more than five times the size of Kaho'olawe. If we allow continued military use, how much more destruction will we face? How much land will be left contaminated, scarred, and unusable for future generations?

Every two years, the U.S. invites 20 Pacific nations to conduct joint training at Pōhakuloa—live-fire rounds from land, sea, and air. These are not simulations. They are real bombs, real missiles, real destruction. The force of these exercises raises enormous clouds of dust—thicker than fog—which are carried high into the atmosphere and lost to our land forever. These dust clouds don't just obstruct the sky; they erode our soil, pollute our air, and further threaten our fragile ecosystems.

Pōhakuloa is not a blank slate for target practice. It is a **wahi pana**, a sacred and storied place, holding the memory of our ancestors and the fragile habitat of some of Hawai'i's most endangered species. The Army has already burned nearly 20,000 acres—much of it critical habitat—through negligent training practices. Their track record is one of desecration, not stewardship.

The Army's EIS is wholly inadequate. It fails to meaningfully assess the long-term environmental and cultural consequences. It offers no serious or enforceable mitigation plans. It does not address the known presence of **depleted uranium**, which is routinely aerosolized and spread through live-fire activity—posing clear risks to human health and the environment.

Let us be clear: Military use is fundamentally incompatible with the land's conservation designation. The ongoing presence of bombs, contaminants, and heavy machinery violates both the spirit and the law of conservation. The Hawai'i Supreme Court has already reminded us, in *Kahaulelio v. DLNR*, that the State bears the "highest duty to preserve and maintain the trust lands." That obligation is *proactive and preventative*.

Rejecting the Army's FEIS is not an act of defiance. It is an act of responsibility.

It is an act of aloha 'āina.

It is a refusal to repeat the mistakes of Kaho'olawe on an even more massive scale.

I urge you to fulfill your kuleana and reject the Army's FEIS. Our lands, our waters, our culture, and our people depend on it.

Mahalo for your time and your service to the land.

**Sincerely,**

Steve Hiramami

Pahoa, Hawaii

Aloha e nā lālā o ka Land Board ē,

He ali'i ka 'Āina, he kauā ke kanaka. *Land is the ruler, we are but its servants.*

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'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 EIS is insufficient and should be rejected on several grounds:

- (1) Inadequate Environmental and Cultural Impact Analysis.
- (2) Lack of a sufficient plan to mitigate impacts to cultural and natural resources.
- (3) Concerns about depleted uranium on the site have gone unaddressed. This is of grave concern for the health of big island residents.
- (4) Military usage is incompatible with the conservation district designation.
- (5) The approval of the EIS ultimately conflicts with the BLNR's constitutional duty to mālama 'āina

I urge the members of the land board to respect the land, the culture, and the people of

Hawai'i by rejecting the Army's FEIS for Pōhakuloa. The Army has not demonstrated the capacity, the awareness, nor the will to serve as a proper steward of this land, and the FEIS fails to meaningfully address these concerns.

It's time to return these lands and begin a real process of healing and restoration. This beloved 'āina of Hawai'i is so much more valuable than a bombing target.

Me ka 'oia'i'o,

Robert Kai Irwin,

Hawaiian Language Curriculum Project Design and Development Manager  
Hilo, Hawai'i

Aloha Chair and Members of the Board,

Mahalo for the opportunity to testify. I am writing to urge you to reject the Army's Final Environmental Impact Statement (FEIS) concerning the proposed retention of lands at Pohakuloa. This document is deeply flawed and fails to meet the legal, environmental, and cultural standards required under Hawaii law.

The 1993 Apology Resolution acknowledged the significance of aina to Native Hawaiian well-being, yet this FEIS perpetuates the same harm it was meant to address. By failing to consider non-military uses of Pohakuloa, the Army demonstrates a lack of good faith and continues to marginalize Native voices and rights. The document ignores the intergenerational trauma and harm experienced by Native Hawaiians whose sacred aina has been bombed and desecrated for decades.

Mahalo,

Mrs R. Jenkins

**From:** [Kyara Kalili](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa rejection testimony  
**Date:** Tuesday, May 6, 2025 4:29:08 PM

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Aloha mai kakou my name is Kyara Keahi Kalili of Keaukaha and I reject the army's pohakuloa final environmental impact statement.... For 70 years the US army has occupied our Mauna and for 70 years they have desecrated it....the use of our sacred Mauna as a live/dummy-fire zone has to stop. None of that rubbish has been cleaned up since 1964 and we the caretakers of this land are calling for a cease and desist and the permanent removal of the US army off of our sacred lands...these firing test are putting our fragile ecosystems at risk of destruction and contamination. This is my testimony in rejection of the EIS and renewal of contracts on our Mauna!!

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 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 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,

Lauren Kaponu

Waimea, Hawai'i

Aloha,

I request that BLNR reject the US Army's final EIS. Respect the community wishes, the aina including our water table, and the culture of this land. Stop live fire on Pohakuloa.

Mahalo,

Selah Levine

Aloha, my name is Moani Mahuna. I am a native Hawaiian cultural practitioner, carver and tattoo artist, born in Honoka'a and raised in Waimea. I have lived in Waimea all my life; and all my life I've had to listen to the bombing of Pohakuloa by the military; some days the bombing would shake my house, other days on the ocean I could hear the bombing from out on the boat. There is no paperwork the Army could submit that will justify causing that much irreversible damage to the land, cultural sites, and the mental and emotional damage the bombing causes to Hawaiians to watch the land we live on be bombed; as well as overall health. We live on an island with finite resources and not enough clean land and water to just continue to let the U.S. Army abuse this island and Pohakuloa so negligently and belligerently with disregard to the people who live here. Wasn't the lesson on bombing already learned on Kaho'olawe? There's no water there now, thanks to the military.

I urge the BLNR to reject the Army's final environmental impact statement (EIS) for the Pohakuloa Training Area (PTA). The environmental and health concerns caused by the continued bombing of the PTA alone are too critical and mounting to avoid. Pohakuloa has been bombed for the last 75 years with a wide range of chemicals including lead and depleted uranium all known to be associated with negative health effects to humans. Waimea sits at the base of Mauna Kea and the winds carry these chemicals like depleted uranium over the vast distance from PTA to Waimea, all the way down to our town, making us sick. We are not safe in our houses away from the bombing. The effects of the bombing at Pohakuloa are not just limited to Pohakuloa. We are affected just living in our homes breathing in the air because of the bombing.

Nothing can reverse the damage already done by the Army to Pohakuloa, but what the BLNR can do, it stop the further desecration of the land and harm to Hawaii island's residents from now on. Reject the EIS and protect the land and our people. We are sick and tired of being sick. Let us heal and let Pohakuloa.

99 years is 99 years too long.

Mahalo

**From:** [Nanea Mangaui](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pohakuloa  
**Date:** Tuesday, May 6, 2025 2:29:02 PM

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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.

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 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 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.

Mai,

Nanea Mangauil

Mai ka 'ahapua'a 'O La'aloa 'O ka Moku 'O Keawe.

Re: 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 Chelsie Martin 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,

Chelsie Martin

Hawaiian decendant born in Honolulu, Hawaii

Hula dancer in Oakland, California

**Best regards,**

**Chelsie Martin**

**(702) 481-1053**

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.

Military training activities 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
- Inadequately addressed environmental contamination and cleanup
- Unresolved protection of endangered species
- 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 Nui,  
Nicole Nakata

Sent from my iPhone

Aloha Members of the Board of Land and Natural Resources,

My name is Phoenix Dunn, 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,

Phoenix Dunn

Lawton, Oklahoma

Aloha members of the Board of Land and Natural Resources,

**I oppose the U.S. Army's proposed retention of leased lands at Pōhakuloa Training Area. Please reject the Army's EIS for two reasons:**

**1. Military training activities are incompatible with conservation, cultural integrity and aloha 'āina. Stand up for your people and your land: say NO to the Army's lease. Please reject the Army's FEIS for Pōhakuloa and begin healing and restoration.**

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. The FEIS fails to address these concerns. For example, the Army already burned nearly 20,000 acres, including designated critical habitat for native flora and fauna. It continues to live-fire and bomb in the impact area! The Army inflicts environmental contamination, endangers the safety of humans and other living beings on this island, degrades over the long-term our land and water.

The FEIS is insufficient and should be rejected on these 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

**2. The Army could soon be abducting and imprisoning us and using their facilities to do so. End their lease before they repeat what they did to our Japanese community in WWII. Recent executive orders explicitly empower the military, including the Army, to arrest and imprison citizens! Recent executive orders command the military to carry out ICE duties, including arresting and imprisoning anyone they suspect of being a non-citizen or helping non-citizens. These executive orders allow ICE and the military to use racial profiling; local citizens will soon be harassed and deported by**

**both ICE and the Army, working together against us. Please say NO to the Army's lease!**

Sincerely,  
Deirdre Roney  
Holualoa

To the Board of Land and Natural Resources on Agenda Item D-1:

The Army has failed to conduct basic environmental and cultural surveys, making this FEIS incomplete and unreliable. DLNR staff made it clear that the Army did not follow Hawai'i's environmental laws. Please stand firm and reject this flawed and unlawful document.

- Hercilia Sevigny

Acceptance or Non-acceptance of the  
Final EIS for the Army Training Land Retention at Pohakuloa  
Agenda Item D-1

Testimony of Lanny Sinkin

While the central question before the BLNR is whether to accept or reject the Final Environmental Impact Statement prepared by the United States Army for lands the Army proposes to retain after a current lease runs out, that question is raised in a broader context.

**Fiduciary Duty**

The lands in question are held in trust by BLNR. As trustee, BLNR has a fiduciary duty to protect those lands from degradation. Yet the application at issue would lease those lands to an entity that specializes in blowing things up.

**Conservation District**

The harm is compounded by the fact that BLNR designated the lands as a conservation district – the highest level of protection. BLNR cannot fulfill its own obligations to the land pursuant to the trustee designation and the conservation designation. The EIS fails cannot reconcile the conflict between those two designations.

**Clean Hands**

The Army has an extensive record of destructive activity on these lands. That record is disqualifying. The Army proposal should never have reached the stage where an EIS was prepared.

**Ownership**

The EIS does not address the rightful claims of the Hawaiian people to the lands at issue. Proceeding to prepare an EIS anyway simply ignores the historical injury inflicted by the illegal seizure of the Kingdom and its lands.

**Sacred Lands**

The Pohaku lands are sacred to the Hawaiian people. Leasing those lands to be bombed and otherwise abused constitutes permitting desecration.

For all the reasons set forth above, BLNR should reject the EIS.

Lanny Sinkin

[Lanny.sinkin@gmail.com](mailto:Lanny.sinkin@gmail.com)

(808) 936-4428

P. O. Box 944

Hilo, Hawai'i 96721

**From:** [Kealoha Sugiyama](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Reject the Army EIS  
**Date:** Tuesday, May 6, 2025 4:29:59 PM

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Reason: Desecration of Pohakuloa.

The Army has proven by example that they are no worthy stewards of Hawaii Aina. This is an island with limited land volume, a paradise, which is being desecrated in the name of warfare. Kahoolawe is a good example of the Army/Military not taking responsibility for their actions and not cleaning up the arsonal left behind.

I was in the Army and stationed at Fort Ord, Texas and that is where war games should be. Texas is so huge that no one would realize what's happening there.

No to the Army continuing presence at Pohakuloa. Reject the Army's EIS.

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Virus-free [www.avast.com](http://www.avast.com)

**From:** [Cassie Sylva](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Stop the Bombing of Pōhakuloa!  
**Date:** Tuesday, May 6, 2025 4:29:02 PM

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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.

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 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 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.

Respectfully,  
Cassie Sylva  
Kea'au, Hawai'i

**From:** [Makamae Torres](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa  
**Date:** Tuesday, May 6, 2025 2:05:49 PM

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To the Board of Land and Natural Resources on Agenda Item D-1:  
Accepting this deficient FEIS would undermine the integrity of your environmental review process. Future applicants will look to this decision as a reason to cut corners. Please reject the FEIS and protect Hawai‘i’s long-term environmental standards.

Aloha  
Makamae Torres

Aloha Members of the Board of Land and Natural Resources,

My name is Nakoa Mahiole Dylan Wilbur , 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,  
Nakoa DM Wilbur

Waianae, Oahu.

**From:** [Jazzmin C](#)  
**To:** [DLNR.BLNR.Testimony](#)  
**Subject:** [EXTERNAL] Pōhakuloa Testimony in Opposition to Proposed Lease Renewal  
**Date:** Tuesday, May 6, 2025 2:12:48 PM

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Aloha kākou,

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

I am writing to oppose any and ALL proposed lease renewals with the United States Army. We especially oppose the retention of Pōhakuloa by the Army and petition the BLNR to move the Army to immediately cease and desist all operations in the ahupua'a of Ka'ohe, and all of our pae 'āina.

I ask the BLNR to redirect their focus and the Army's focus to mālama 'āina and for the BLNR to honor the Supreme court's ruling and to find the courage to petition the Army to draft and implement a golden standard plan of action for mass clean up efforts of existing UXO sites within Pōhakuloa by 2029 and to have the Army simultaneously draft a timeline for clean up efforts throughout our entire pae 'āina by 2035 (10 years).

In the 2025 EIS drafted by the Army they mention Uncle Ku and Auntie Maxine's court case and share that "... The lawsuit did not include the U.S. Government" - however the U.S. Government and it's Army are the leaseholders therefore I believe the Army is directly responsible for abiding by the lease and that the terms of the lease agreement should be upheld by the State of Hawai'i and the BLNR.

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

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

Me ke aloha,

'Ohana Pu'uohau Cabanilla