

KANEHILI –MCAS EWA COMMENTS FROM O’AHU CITY COUNCIL DISTRICT 1

Comments on Navy Environmental Assessment for PV Energy Parks and HCDA HECO Major East Kalaeloa Energy Corridor Powerline Plan

By City Councilman Tom Berg, District 1

Historic MCAS Ewa – NAS Barbers Point - Kalaeloa should use only the existing historic base roads and right-of-ways, which when logically analyzed, provide all of the necessary North-South and East-West arterial connections needed to serve the entire area very well. NAS BP and MCAS EWA are really TWO DISTINCT base properties with different planning use and roadway needs and need to be seen as entirely separate projects within Kalaeloa.

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June 11, 2012

Commander,
Navy Region Hawaii
850 Ticonderoga St, Suite 110
Pearl Harbor, Hawaii 96860-5101

Dear Sir,

Thank you very much for allowing comments on the Draft Environmental Assessment for the Kalaeloa Renewable Energy Park as proposed by Hunt Corp-FIV. I live near the former naval air station and have personally followed this entire process for the past eleven years with great interest. This property is especially important to our Ewa community because within the former navy lands was Marine Corps Air Station Ewa. MCAS Ewa, or Ewa Mooring Mast Field, which was attacked by Japanese warplanes on December 7, 1941, and is today eligible and under consideration to become a National Battlefield and National Landmark.

My greatest concerns are that the Hawaii Community Development Authority take care of the historic base properties, conservation areas and open spaces that the Ewa Community wants preserved, and not have them wind up in the hands of interests that don't share these community preservation values. HCDA's 2006 KMP appears to want to limit and exclude sites which it does not want to be included as culturally or historically important, such as the former Ewa Field airfield and battlefield, and bulldoze two unnecessary roads through the center of it.

The strength of this HCDA planning document to supersede the provisions of the City and County of Honolulu land use ordinance, the provisions of the Ewa development plan, and the provisions of the Naval Air Station Barbers Point community redevelopment plan is somewhat questionable and does not appear to follow along the intent of the Navy land transfer to HDCA. The planners of Kalaeloa should recognize that this area was actually two distinct military bases with distinctly different histories.

MCAS Ewa has it's own unique history that ties in directly with the Ewa Plantation Community and the nearby O.R. & L. Railway, going back to the 1920's when it was Ewa Mooring Mast airfield, built for a Navy airship program. It was a base that started very small, saw renewed development as a US Marine Corps airfield in 1940-41, and

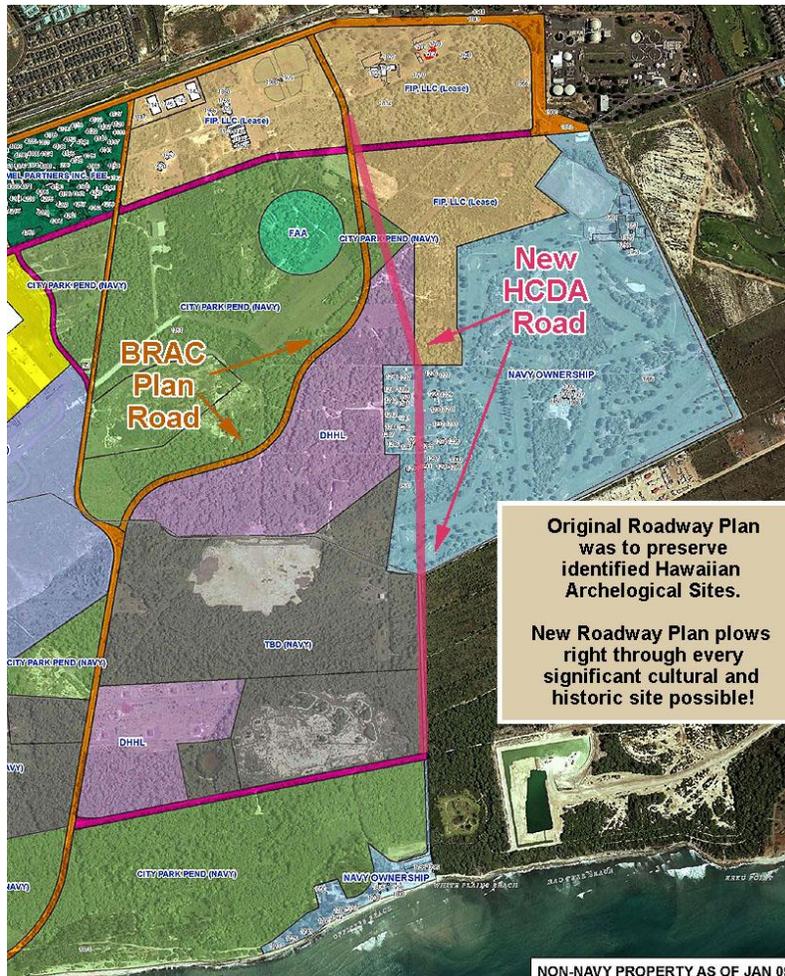
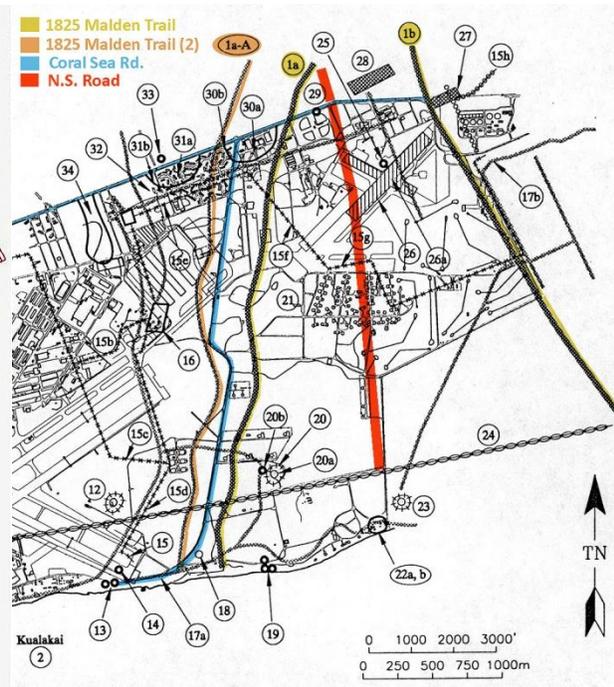
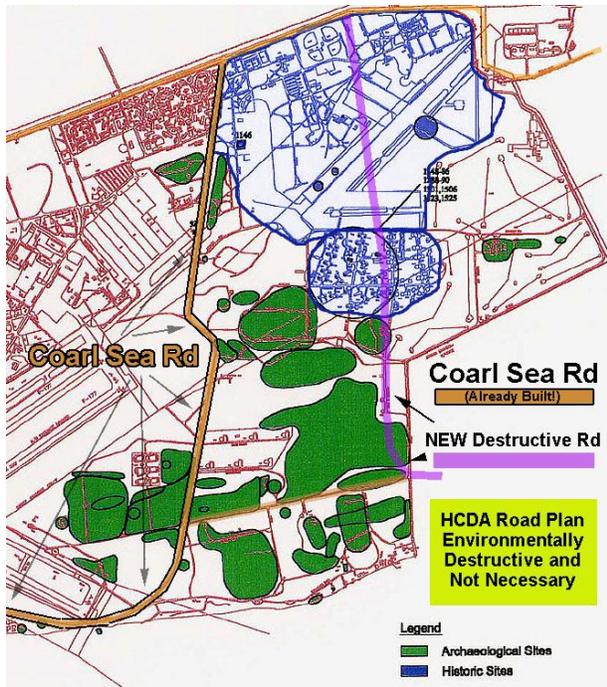
then exploded outward once the Pacific War began on December 7, 1941. It was a continuous work in progress as more runways, buildings, hangers and taxiways were needed to handle large-scale WW-II fighter aircraft training and Pacific air logistics that supported the successful Pacific Island Campaigns.

NAS Barbers Point also has its own unique history, and was completely designed from scratch, before the Pacific War even started, to be in a much larger and permanent diamond pattern design with two massive runways, with heavy fortified concrete buildings and huge Alfred Kahn aircraft hangers. It was the sudden start of WW-II that caused NAS Barbers Point construction to be delayed and all efforts put into making MCAS Ewa fully operational. By 1942, SeaBee Construction units, based in a large community on MCAS Ewa, and using Coral Sea Road as their major North-South transit highway, and Roosevelt Road as their major East-West transit highway, built NAS Barbers Point. These two distinctly different base histories should be factored into all Kalaeloa planning schemes with the realization that one area is better suited for open space and recreational use, while the other area was intentionally designed to be an urban community with major airport, from the very beginning.

I strongly agree with the January 21, 2011 comments submitted by Brian Turner, Esq. Regional Attorney, Western Office, National Trust for Historic Preservation (NTHP) on the Draft Kalaeloa Administrative Rules.

The National Trust for Historic Preservation was chartered by Congress in 1949 as a private nonprofit organization for the purpose of furthering the historic preservation policies of the United States and facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of NTHP members nationwide, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The Trust has nine regional offices around the country, including a Western Office in San Francisco which is specifically responsive to preservation issues in Hawaii.

The Kalaeloa Community Development District consists of 3,700 acres west of Honolulu on the Ewa plain and includes a host of historically important sites. The draft rules replace current rules that govern development within the existing state law with respect to future development that occurs in the district. I believe the rules must further strengthen and not weaken protections for historic properties in Kalaeloa.



Below I suggest several recommendations, based upon advice of the National Trust for Historic Preservation, to make the permitting process more predictable for applicants and ensure that Hawaii's heritage is adequately protected in the development process.

I would like to note that HCDA earlier this year *rejected* these NTHP comments and refused to include them in their final Kalaeloa Draft Rules document. I find this very disturbing that they don't want to strengthen the weak and questionable historic and cultural aspects defined in the Kalaeloa Master Plan, as suggested by the NTHP attorney.

I. Impacts to Culturally Significant Properties must be explicitly disclosed in applications for Project Eligibility Review.

I am pleased to see that any application for a project eligibility review will require, among other factors, a review of project impacts on historic and archaeological properties (1.12 15-215-12(a)). However, they do not appear to require the applicant to provide any analysis of impacts to culturally significant properties in a subsequent section that enumerates the required components of an application for project eligibility review (1.12 15-215-12(e)).

This creates internal inconsistency in the rules as to what information will and will not be required from applicants. I strongly concur with the NTHP and recommend that the rules specifically require applicants to provide information regarding culturally significant properties in its application for project eligibility review.

Further, the development application requirements improperly omit any requirement for applicants to provide information related to culturally significant properties (1.13 15-215-13). This section must be revised to include such a specific requirement to ensure development within the Kalaeloa boundaries is sensitive and respectful of the cultural resources within the district.

In addition, the draft rules do not give the authority reviewing the application the explicit power to consider the project's impacts to cultural properties (1.16 15-215-16). In contrast, the criteria do include many other considerations in the public interest such as impacts to vehicle and pedestrian circulation and existing uses of the land in the area. I recommend that the rules highlight the specific authority for the permit review authority to deny an application in the event the development would adversely impact on cultural and historic properties.

II. The requirement to consult with the State Historic Preservation Division (SHPD) must be strengthened and made consistent. Section 1.18 15-215-18(1) requires that applicants consult with the SHPD prior to project eligibility review for impacts to properties that the authority determines to be historically and culturally significant.

This section contains numerous inconsistencies and apparent misstatements as to what the law requires.

- (a) Subsection (a) states that the “authority” is the sole arbiter of what is historically and culturally significant. However, subsection (d) states that SHPD has the authority to make this determination. Subsection (a) should be revised to ensure that the judgments as to what is and is not historic are made by qualified preservation experts, such as SHPD staff.
- (b) Subsection (a) refers to compliance with the implementing regulations of section 106 of the National Historic Preservation Act (NHPA), but it is not clear why compliance with this federal law is required. The draft rules should be amended to indicate why section 106 review is required by explaining, for instance, that this is a condition in the agreement transferring the land from the Navy. Moreover, it should be clear that *any* application for development must go through this review as the existing cultural resource surveys of the land at Kalaeloa is outdated and did not include a thorough identification effort. Subsection (c) appears to make this clear to potential applicants by stating that a letter of SHPD concurrence is required prior to project eligibility review. But subsection (a) is contradictory as it is more limiting, stating that state law applies only to properties that the *authority* has deemed historically and culturally significant.
- (c) Subsection (d) contains a clear misstatement of the requirements of Section 106 of NHPA when projects will impact culturally or historically significant properties. It refers only to “mitigation” for impacts when properties will have adverse effects. This section should refer to the ultimate goals of avoiding and minimizing impacts and refer to mitigation only as a last resort. (See 36 C.F.R. § 800.1(a)). The SHPD’s authority should not be limited solely to approving mitigation measures.

III. Section 1.20 15-215-20 must be clarified to adequately reflect the requirement to consult with SHPD.

According to comments by Historic Hawaii Foundation, Section 1.20 15-215-20 states that a historic or culturally significant property within the district may be put to any use, subject to the requirements of section 15-215-19. This appears to be a typo as section 15-215-19

refers only to the designation of such sites (The entirety of the section states: “Properties deemed historic or culturally significant and listed on the State and National Historic Register are so designated in the KMP.”) Presumably this section should refer to 1.18 15-215-18 which relates to consultation with the “state historic preservation district.” (Note: the use of the word “district” in the heading of 1.18 15-215-18 also appears to be in error and should read “division”).

I strongly support SHPD’s ability to place conditions on the otherwise free use of historic properties within Kalaeloa. However, this section should be revised and expanded to also give deference to the views of consulting parties and the local Ewa public which have an essential role in the Section 106 review process.

IV. The definitions of “culturally significant” and “historically significant property” must be amended to include properties eligible for the National and Hawai’i Registers

I strongly concur with the NTHP attorneys concern that the definition of “culturally significant” or “historically significant property” is far too limited in both the definitions section of the rules (1.2 15-215-2) and the section related to the designation of sites (1.19 15-215-19). The draft definition currently includes on resources that are *listed* on the National or Hawaii Registers of Historic Places or designated in the Kalaeloa Master Plan as significant. The definition should be expanded to include properties that are *eligible* for the National or Hawai’i Register in addition to listed properties.

V. General concerns with respect to impacts to Ewa Field proposed in Kalaeloa Master Plan

I am particularly concerned, along with NTHP attorneys concurrence, that the HCDA Kalaeloa Master Plan indicates that an extension of the Kualaka`i Parkway is slated to run directly through historic Ewa Field which is located within the Kalaeloa District. This former runway was the site of intense fighting on December 7, 1941 where American Marines fought back against Japanese warplanes. Tangible evidence of the battle in the form of strafing marks is still apparent in concrete pavers on the airfield and a battlefield survey is currently underway. I strongly urge, along with NTHP attorneys advice and consultation, that HCDA reconsider the proposed placement of the Parkway and plan to participate in the Federal and State review process to ensure that adverse impacts to the site are avoided.

The Hawaii State Legislature passed a resolution in 2009 advocating a preservation and heritage tourism concept for MCAS Ewa Field. The HCDA Kalaeloa Administrative master plan doesn't take any note or makes mention of this widespread local Ewa community neighborhood board and Hawaii state legislative statement of public concern.

The Ewa Field Resolution 49 was passed by the Hawaii State Legislative session on Wednesday, May 6, 2009

URGING FULL PRESERVATION OF UNITED STATES MARINE CORPS AIR STATION EWA AS A NATIONAL MONUMENT, MUSEUM, AND RESTORED PARK FOR THE STATE OF HAWAII.

http://www.capitol.hawaii.gov/session2009/lists/measure_indiv.aspx?billtype=HCR&billnumber=49

The State Legislature got behind the Preservation of the MCAS Ewa Field with the goal to expedite the listing of the December 7, 1941 battlefield as a National Monument, National Landmark and recognized National American Battlefield.

Nearly identical resolutions were also passed in 2009 on Oahu by three Neighborhood Boards- Ewa Beach NB, Waipahu NB and Kailua-Windward NB.

This is the expressed will of the Ewa-West Oahu community. It couldn't be stated any clearer what the Ewa West Oahu Community wants to see at for MCAS Ewa Field.

I would also like to include in my comments the Known Ewa Sites & Structures list provided by Elizabeth S. Merritt, Deputy General Counsel, National Trust for Historic Preservation, 1785 Massachusetts Ave. NW, Washington, DC 20036. These are shown below:

Known Ewa Sites & Structures in NAVY BRAC Transfer. Note: These areas have only received low level Phase II archaeology surveys and additional site surveys need to be done as well as historic battlefield survey done by professional battlefield analysis experts beyond the "**preliminary**" report generated earlier this year by AECOM and Mason Architects for the Hunt Corporation plans for a Photo-Voltaic solar power farm on the Ewa Field runway.

EWA FIELD (1925-1942)

- o (Includes Approximately 2/3 of the FAA Site)
- o Perimeter Property Line / Former Fence Line (1925 -1942)
- o Southwest Extension to Main Ewa Field Runway (1941)
- o Former Main Hangar 123 Bldg. Platform (1941)
- o Hawaiian Habitation Complex (State No. 3721) (Just inside Perimeter Line)

- o Sisal Walls Remnant (State No. 3722) (Just outside the Perimeter Line)
- MCAS EWA (1942-1952)
 - o (Includes Approx. 1/3 of the FAA Site)
 - o Perimeter Property Line / Former Fence Line
 - o Bldg. 137, Former Communications Splinter-proof Structure (ca. 1943)
 - o Bldg. 1545, Operational Storage, Quonset hut) (ca. 1943)
 - o Bldg. 1146 Hangar (1944)
 - o Bldg. 1546 Operational Storage & Electrical Shop, Quonset hut) (ca 1943)
 - o Anti-Aircraft Battery WWII (State No. 5096)
 - o Anti-Aircraft Complex Remnants (State No. 5097)
 - o WWII Housing Complex Remnants (State No. 5099)
 - o Potential Former 5" Anti-Aircraft Gun Site, (Location South of Runway)
 - o Sinkhole Complex, near and along Coral Rd. (State No. 5094)
 - o Sinkhole Complex (State No. 5198) -- NAS Barbers Point (1942-1999)
 - o Bldg. 92, Bombproof Substation (ca 1942)
 - o Hawaiian Dune Burial Site Near Shoreline (State No. 5126)
 - o Sinkhole Complex (State Site No. 5108)
- NAS Barbers Point Cold War Era Structures (1962-1999)
- Pride baseball Field – MCAS Ewa and later NASBP (1941-1999)

The National Park Service comments on the Hunt Corporation AECOM and Mason Architects 2011 Ewa Field battlefield survey report are somewhat critical and states:

We do not consider the boundaries adequate for consideration since this study was commissioned to represent the battlefield resources for this portion of the Pearl Harbor engagement.

The evaluation is missing a presentation of the archeological battlefield resources (especially field of fire) which might expand the boundary significantly. There is no visual or view shed (observation) analysis, which would certainly include more area than depicted. We recommend that the study be revised to include archeological battlefield resources as well as view shed analysis.

The report is generally well written and straight forward; however, we believe that the findings of the evaluation are based on an incomplete analysis that does not include some of the standard methodology used by the American Battlefield Protection Program to evaluate battle fields. Given the need for additional study and evaluation, we cannot concur with the findings of AECOM's Battlefield evaluation of Ewa Field.

Our American Battlefield Protection Program staff would happily work with the contractor to remove some of the inconsistent references to the core area versus the

historic extent of the battlefield, the supporting assertions, the role of the avenue of approach and egress on all battlefields and a detailed analysis of the report.

A concern with the report and the summary conclusion is the finding of minimal integrity.

This conclusion is based on a misapplication of the NR (National Register) standards as applied to the Ewa Battlefield and is incorrect. For example there appears to be some confusion between the application of NR standards for integrity and the concept of condition, as well as several contradictory statements pertaining to the NR standards vis a-vis the defining features.

In addition, the battlefield integrity conclusions for the standards of Association and Feeling are incorrect (pg. 20). In short, the Ewa Battlefield retains quite a bit of integrity based on the NR standards as set out in NR Bulletin 40

Only a defensive posture is considered rather than both sides of the conflict. It is standard battlefield evaluation methodology to consider the battle vantage point of both combatants. In an air assault where the planes may have been as low as 20 feet from the ground, the view sheds (both attack and defense) becomes critical to the understanding of the site. We recommend that the evaluation be revised to include an analysis of both vantage points.

** End of NPS Comments **

1925 Ewa Mooring Mast Field is one of the very oldest historic aviation sites and airfields in the State of Hawaii.

National Park Historian Daniel Martinez calls the December 7, 1941 Ewa Field "Sacred Ground."

The National Park Service is considering officially making MCAS Ewa Field part of the new WW-II "Valor in the Pacific" National Monument.

Significant oral history testimony has been collected from Ewa Village residents, many of whom are still alive, detailing the extensive air and ground battle over and around Ewa Field and Ewa Village on December 7, 1941.

In 1944 FDR toured MCAS Ewa Field in a convertible sedan, also carrying General Douglas MacArthur and Admiral Chester Nimitz. They turned off Fort Weaver Rd, came down Geiger Rd and onto then North Hansen Road (to be named Roosevelt in the late 1950's) and visited the base. They also visited NAS Barbers Point, before returning back the same route to Honolulu.

Former MCAS Ewa is located by historic Ewa Village Plantation, on the State Historic Register, with the nearby Oahu Railway and Museum, on the National Historic Register, and with a likely National WW-II Battlefield designation, is destined to always have a more rural open space and historic character. Note too that developers of the Navy golf course, the Geiger Road re-alignment and the installation of the FAA navigation beacon all carefully avoided infringing upon the original 1941 December 7th airfield. This was

because all of the land use planners and civil engineers knew then the site was very historic and important to save. This was not a coincidence, it was by design.

In December of 2010 a Face Book CAUSE was set up to advocate preservation of the Ewa Field battlefield and object to a roadway through the area. Within two weeks, over 1000 people had joined the Save Ewa Field cause nationwide. This is an indication that American Battlefields are considered as "Sacred Ground" to most mainland US residents, who are by the way, major visitors to Hawaii, and any construction through MCAS Ewa will be meet with significant amounts of bad national publicity and public rancor among veterans groups.

1.18 15-215-18 Preliminary consultation with state historic preservation

Further Historic Advisement has been sought from the State Historic Preservation Division, Department of Land and Natural Resources under Chairman William Aila.

I have been so advised in correspondence of April 28, 2011 by the State Historic Preservation Division, Ross W. Stephenson, SHPD Historian, and Pua Aiu, Administrator, about concerns related to the former MCAS Ewa and NAS Barbers Point lands that have been part of the intended NAVY BRAC transfer to the City of 388 acres of land, including vacant property and a mixture of abandoned runways, warehouses, roads, Quonset huts, and other structures. This area includes the boundaries of Site 5127 (Ewa Field).

SHPD and the National Advisory Council on Historic Preservation have engaged in several discussions with the Navy and property grantees about historic resources on the former base. The Navy on October 28, 1998 (Ser 233/3957) agreed to include protective covenants to ensure preservation and appropriate treatments of historic properties. A December 12, 1998 letter from SHPD identified sites needing preservation or data recovery. A March 11, 2010 communication from the Navy BRAC office clarified that lot 13058-B would go to the City and County of Honolulu for park use. On April 20, 2010 SHPD recommended a conditional no effect determination that included recognition of eligibility for the National Register of Historic Places and protective covenants for the former Marine Corps Air Station (MCAS) Ewa (often referred to as "Ewa Field").

My office also notes that the North-South Road (Kualaka'i Parkway) and a major electrical transmission line as currently designed would bisect the Hawaiian Railway Society baseyard, Ewa Field, and the aircraft revetments just west of the Navy Golf Course. SHPD's letter of April 20, 2010 notes that the boundaries of Site 5127 (Ewa Field) should be expanded to include the entire former

MCAS. The Navy's Historic Preservation Covenants include language declaring "Actions that would affect views, including adding new structure site elements such as towers, fences, or obtrusive signs, may also be considered to materially affect the Historic Properties". This same type of covenant should cover the seventy five aircraft revetments located west of the Navy's golf course currently used by the Barbers Point Riding Club.

1.19 15-215-19 Designation of historic and cultural sites

The Kalaeloa Draft rules, according to the Historic Hawaii Foundation, further limit the protection of historic and cultural resources by creating a narrow definition of historic and cultural resources. They would only allow those listed on the State and National Registers to be deemed historic or culturally significant and would use this new criteria to replace the earlier protections in the 2006 Kalaeloa Master Plan. The process of nominating historic properties is ongoing and never complete; and it is improper to assume that properties need to be on both State and federal registers. Draft rules 15-215-18, -19, -20, -21 deal with historic preservation. Historic Hawaii Foundation has a concern that these section intend to limit and restrict the existing legal processes and protections for historic and cultural resources, rather than reinforce or strengthen them.

The HCDA Kalaeloa Plan is very selective about what is defined as "cultural" and it is only defined basically as what is Hawaiian culture ONLY. Two Hawaiian organizations are the only HCDA Kalaeloa cultural consultants and one else was apparently ever asked or allowed into this definition of cultural correctness for Kalaeloa.

The only "Heritage Park" is one that HCDA has designed as being officially recognized and supported with large amounts of public land, including Navy BRAC land that was originally going to the City. This large amount of land could have also been used in a possible land swap with FIP Hunt Corporation regarding the Ewa Field Battlefield site, but despite years of being aware of this issue no action was ever taken, despite many recommendations.

Despite being intended for full preservation, the "Heritage Park" in published articles makes mention of commercial development, etc. It seems this is almost an "insider deal" of certain parties obtaining Navy BRAC land intended for conservation and recreation and using it for financial profit. The relationship between the HCDA Kalaeloa administration and the people selected to manage this property seems extremely close

and somewhat begs a possible ethics investigation, as well as a review by the City and the Navy BRAC office.

2.3 15-215-34 Special districts

An MCAS Ewa Historic District has been proposed in a Navy contracted cultural resource survey. This district comprising 75 aircraft revetments built in 1942, should be incorporated into all future Kalaeloa planning. The exact boundaries and historic significance are available through SHPD files and documents.

Two Historic Districts have been proposed in Navy contracted cultural resource surveys for NAS Barbers Point - A WW-II Housing Area and Central Core Historic District. These two districts should be incorporated into all future Kalaeloa planning. The exact boundaries and historic significance are available through SHPD files and documents.

15-215.5 Thoroughfares

The Kalaeloa Master Plan should intelligently use the existing historic MCAS Ewa base arterial roadways, expand them to four lanes and keep interior traffic LOCAL, which better fits the great descriptions of what Kalaeloa is supposed to be- a community encouraging slower 25 mph speeds, bikeways, etc. There is absolutely no reason to create a new roadway connection with the existing Saratoga Avenue and extend it across historic MCAS Ewa land and connect it with Geiger Road as the 2006 KMP states it will do.

The extension of Geiger Road directly across and through the historic Ewa Field December 7 battlefield is completely unnecessary and will never be needed as a transit route because Geiger Road was aligned and connected to today's Roosevelt Avenue in the 1940's during the original design of the base. Traffic has flowed very smoothly on this same existing right-of-way for six decades since, allowing transit from Ewa all the way down Roosevelt to today's Kalaeloa Blvd- which is currently blocked off and should be reopened.

When the traffic eventually does increase, the answer is to make Geiger and Roosevelt four lanes- and not create a totally unneeded parallel roadway a couple of hundreds yards away in an important historic battlefield site which will only invite future lawsuits.

There is also a major North-South historic right-of-way- Coral Sea Road, which could be expanded to be a significant four lane parkway and North-South connector- which it was in fact originally designed to be, and which could well satisfy the transit needs to reach the Ewa Coast beach parks and also serve as a second access roadway to the Haseko development allowing connection to Keoneula Blvd.

Currently, the segment of Kapolei Parkway between Kamokila Boulevard and Fort Barrette Road is not yet completed but will be constructed by the City & County of Honolulu. When this Kapolei Parkway segment is in place it will provide a continuous connection between Kalaeloa Boulevard and Geiger Road. The completion of the missing segment of Kapolei Parkway will have a substantial effect on the traffic volumes on Franklin D. Roosevelt Avenue, as some Ewa-Diamond Head traffic would divert from the existing two-lane road to the six-lane parkway. Kapolei Parkway is the preferred East-West commuter route while Franklin D. Roosevelt Avenue will serve well as an additional future four lane East-West transit route within Kalaeloa-Barbers Point communities.

Also noted from my office's research on historic preservation is the fact that the Department of Transportation Act (DOT Act) of 1966 includes a special provision - Section 4(f) - which stipulates that the Federal Highway Administration (FHWA) and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless the following conditions apply:

There is no feasible and prudent alternative to the use of land. The action includes all possible planning to minimize harm to the property resulting from use.

Section 4(f) of the Department of Transportation (DOT) Act of 1966 was set forth in Title 49 United States Code (U.S.C.), Section 1653(f). A similar provision was added to Title 23 U.S.C. Section 138, which applies only to the Federal-Aid Highway Program.

In addition, the historic MCAS Ewa areas are also nesting grounds for the endangered Pueo, (*Asio flammeus sandwichensis*) – considered sacred by many Hawaiians. It is a widely recognized Hawaiian ancestral guardian known as *aumakua*. These birds are believed to protect individuals from harm, and even death. Disturbing their favored nesting areas would be extremely controversial and a subject of great public concern in the Ewa Community.

Use Coral Sea Road- yet to be funded for improvement- that once improved- to be the route as the main thoroughfare extension for Kualaka`i Parkway makai/south of Roosevelt Avenue to connect to Keoneula Boulevard. This will preserve the ball fields and riding stables in Kalaeloa in order for them to maintain operations without further disturbance. Please do not use the current configuration in this plan to extend Kualaka`i Parkway that abuts the ball fields and riding stables. Please open and advance Essex Road as a pedestrian thoroughfare (currently closed around the golf course) as well to connect to the Leeward Bikeway. All military sites must undergo Section 106 prior to any development.

The strength of this document to supersede the provisions of the city and county of Honolulu land use ordinance, the provisions of the Ewa development plan, and the provisions of the Naval Air Station Barbers Point community redevelopment plan is questionable and does not appear to follow along the intent of the transfer to HDCA. It seems ambitious to plan for such a variety of mixed use (perhaps spot zoning) with a mandate to preserve the cultural history, protect the environment and its inhabitants in a regional park. The characteristics here do not describe anything to the mind's eye or give me a feel for the ambiance of a mixed use neighborhood.

It seems like HCDA is doing the work of City Department of Planning & Permitting in many cases, and since much of this Kalaeloa public area will ultimately be transferred to the City, HCDA should be using City guidelines.

In closing, there still remains a question of HCDA adequately addressing public input and not just being a vehicle for what developers want. This is public land, not private land, and significant development in Ewa West Oahu requires transparency and an honest public hearing process and honest and timely addressing of public comments before final decisions are made.

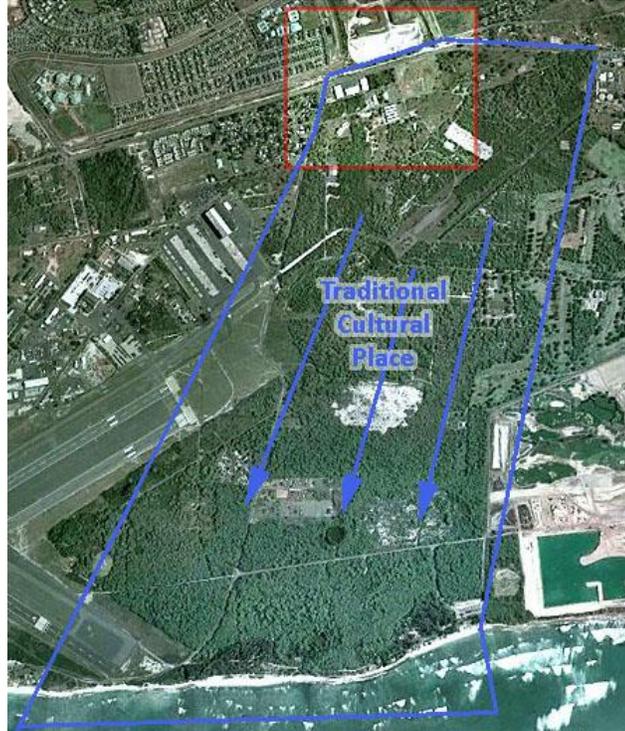
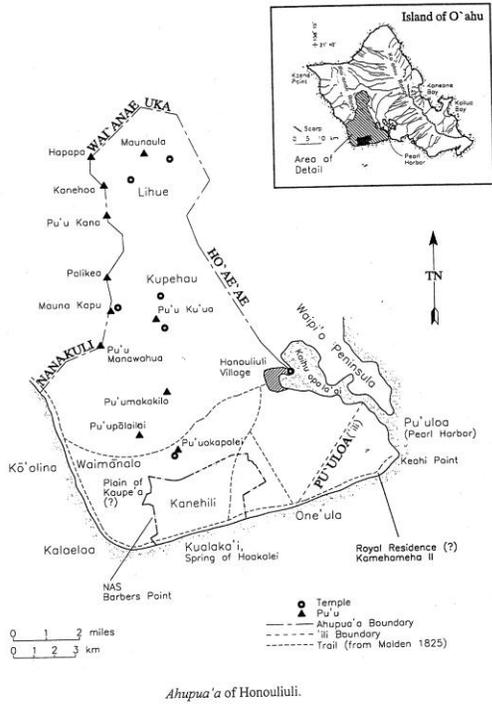
Mahalo and thank you for allowing me to comment on this very important Council District 1 development project involving former naval air station lands.

Aloha,

A handwritten signature in black ink, appearing to read "Tom Berg". The signature is stylized and cursive, with the first name "Tom" written in a more fluid, connected style to the last name "Berg".

TOM BERG
Councilmember – District 1
Ewa Beach, Kapolei, Waianae Coast

TB:ge



May 9, 2011
 Mr. Anthony J. H. Ching
 Executive Director
 Hawai'i Community Development Authority
 461 Cooke Street
 Honolulu, Hawai'i 96813
 Attention: Tesha Malama, Kalaeloa Office

Thank you very much for allowing comments on the Kalaeloa Draft Administrative Rules. There were 122 comments made on the draft early this year. However I have since learned that addressing the comments and their legitimate concerns will not be done until later this year, and well after the downtown May 18 final hearing at the HCDA Kakaako office. This does not seem like HCDA is actually intending to incorporate these public comments in their final rules, but is only doing this comment process as a formality before approving only what HCDA wants included.

Also, holding a downtown meeting during morning business hours about this significant, large scale West Oahu development scheme, without providing the West Oahu community a full hearing during a convenient evening meeting doesn't seem to be a very transparent hearing process. Hopefully my comments here are not just something that will be deposited into a file cabinet with a thank you note sent later this year after all the development deals are made without any real public review.

1.5 15-215-5 Purpose and Intent

The strength of this HCDA planning document to supersede the provisions of the City and County of Honolulu land use ordinance, the provisions of the Ewa development plan, and the provisions of the Naval Air Station Barbers Point community redevelopment plan is somewhat questionable and does not appear to follow along the intent of the Navy land transfer to HDCA. The planners of Kalaeloa should recognize that this area was actually two distinct military bases with distinctly different histories.

MCAS Ewa has its own unique history that ties in directly with the Ewa Plantation Community and the nearby O.R. & L. Railway, going back to the 1920's when it was Ewa Mooring Mast airfield, built for a Navy airship program. It was a base that started very small, saw renewed development as a US Marine Corps airfield in 1940-41, and then exploded outward once the Pacific War began on December 7, 1941. It was a continuous work in progress as more runways, buildings, hangers and taxiways were needed to handle large-scale WW-II fighter aircraft training and Pacific air logistics that supported the successful Pacific Island Campaigns.

NAS Barbers Point also has its own unique history, and was completely designed from scratch, before the Pacific War even started, to be in a much larger and permanent diamond pattern design with two massive runways, with heavy fortified concrete buildings and huge Alfred Kahn aircraft hangers. It was the sudden start of WW-II that caused NAS Barbers Point construction to be delayed and all efforts put into making MCAS Ewa fully operational. By 1942, SeaBee Construction units, based in a large community on MCAS Ewa, and using Coral Sea Road as their major North-South transit highway, and Roosevelt Road as their major East-West transit highway, built NAS Barbers Point. These two distinctly different base histories should be factored into all Kalaeloa planning schemes with the realization that one area is better suited for open space and recreational use, while the other area was intentional designed to be an urban community with major airport, from the very beginning.

I strongly agree with the January 21, 2011 comments submitted by Brian Turner, Esq. Regional Attorney, Western Office, National Trust for Historic Preservation (NTHP) on the Draft Kalaeloa Administrative Rules.

The National Trust for Historic Preservation was chartered by Congress in 1949 as a private nonprofit organization for the purpose of furthering the historic preservation policies of the United States and facilitating public participation in the preservation of our nation's heritage. 16 U.S.C. § 468. With the support of NTHP members nationwide, the National Trust works to protect significant historic sites and to advocate historic preservation as a fundamental value in programs and policies at all levels of government. The Trust has nine regional offices around the country, including a Western Office in San Francisco which is specifically responsive to preservation issues in Hawaii.

The Kalaeloa Community Development District consists of 3,700 acres west of Honolulu on the Ewa plain and includes a host of historically important sites. The draft rules replace current rules that

govern development within the existing state law with respect to future development that occurs in the district. I believe the rules must further strengthen and not weaken protections for historic properties in Kalaeloa.

Below I suggest several recommendations, based upon advice of the National Trust for Historic Preservation, to make the permitting process more predictable for applicants and ensure that Hawaii's heritage is adequately protected in the development process.

I. Impacts to Culturally Significant Properties must be explicitly disclosed in applications for Project Eligibility Review

I am pleased to see that any application for a project eligibility review will require, among other factors, a review of project impacts on historic and archaeological properties (1.12 15-215-12(a)). However, they do not appear to require the applicant to provide any analysis of impacts to culturally significant properties in a subsequent section that enumerates the required components of an application for project eligibility review (1.12 15-215-12(e)).

This creates internal inconsistency in the rules as to what information will and will not be required from applicants. I strongly concur with the NTHP and recommend that the rules specifically require applicants to provide information regarding culturally significant properties in its application for project eligibility review.

Further, the development application requirements improperly omit any requirement for applicants to provide information related to culturally significant properties (1.13 15-215-13). This section must be revised to include such a specific requirement to ensure development within the Kalaeloa boundaries is sensitive and respectful of the cultural resources within the district.

In addition, the draft rules do not give the authority reviewing the application the explicit power to consider the project's impacts to cultural properties (1.16 15-215-16). In contrast, the criteria do include many other considerations in the public interest such as impacts to vehicle and pedestrian circulation and existing uses of the land in the area. I recommend that the rules highlight the specific authority for the permit review authority to deny an application in the event the development would adversely impact on cultural and historic properties.

II. The requirement to consult with the State Historic Preservation Division must be strengthened and made consistent.

Section 1.18 15-215-18(1) requires that applicants consult with the State Historic Preservation Division prior to project eligibility review for impacts to properties that the authority determines to be historically and culturally significant. This section contains numerous inconsistencies and apparent misstatements as to what the law requires.

- (a) Subsection (a) states that the "authority" is the sole arbiter of what is historically and culturally significant. However, subsection (d) states that SHPD has the authority to make this determination. Subsection (a) should be revised to ensure that the judgments as to what is and is not historic are made by qualified preservation experts, such as SHPD staff.
- (b) Subsection (a) refers to compliance with the implementing regulations of section 106 of the National Historic Preservation Act (NHPA), but it is not clear why compliance with this federal law is required. The draft

rules should be amended to indicate why section 106 review is required by explaining, for instance, that this is a condition in the agreement transferring the land from the Navy. Moreover, it should be clear that *any* application for development must go through this review as the existing cultural resource surveys of the land at Kalaeloa is outdated and did not include a thorough identification effort. Subsection (c) appears to make this clear to potential applicants by stating that a letter of SHPD concurrence is required prior to project eligibility review. But subsection (a) is contradictory as it is more limiting, stating that state law applies only to properties that the *authority* has deemed historically and culturally significant.

(c) Subsection (d) contains a clear misstatement of the requirements of Section 106 of NHPA when projects will impact culturally or historically significant properties. It refers only to “mitigation” for impacts when properties will have adverse effects. This section should refer to the ultimate goals of avoiding and minimizing impacts and refer to mitigation only as a last resort. (See 36 C.F.R. § 800.1(a)). The SHPD’s authority should not be limited solely to approving mitigation measures.

III. Section 1.20 15-215-20 must be clarified to adequately reflect the requirement to consult with SHPD

According to comments by Historic Hawaii Foundation, Section 1.20 15-215-20 states that a historic or culturally significant property within the district may be put to any use, subject to the requirements of section 15-215-19. This appears to be a typo as section 15-215-19 refers only to the designation of such sites (The entirety of the section states: “Properties deemed historic or culturally significant and listed on the State and National Historic Register are so designated in the KMP.”) Presumably this section should refer to 1.18 15-215-18 which relates to consultation with the “state historic preservation district.” (Note: the use of the word “district” in the heading of 1.18 15-215-18 also appears to be in error and should read “division”).

I strongly support SHPD’s ability to place conditions on the otherwise free use of historic properties within Kalaeloa. However, this section should be revised and expanded to also give deference to the views of consulting parties and the local Ewa public which have an essential role in the Section 106 review process.

IV. The definitions of “culturally significant” and “historically significant property” must be amended to include properties eligible for the National and Hawai’i Registers

I strongly concur with the NTHP attorneys concern that the definition of “culturally significant” or “historically significant property” is far too limited in both the definitions section of the rules (1.2 15-215-2) and the section related to the designation of sites (1.19 15-215-19). The draft definition currently includes on resources that are *listed* on the National or Hawaii Registers of Historic Places or designated in the Kalaeloa Master Plan as significant. The definition should be expanded to include properties that are *eligible* for the National or Hawai’i Register in addition to listed properties.

V. General concerns with respect to impacts to Ewa Field proposed in Kalaeloa Master Plan

I am particularly concerned, along with NTHP attorneys concurrence, that the HCDA Kalaeloa Master Plan indicates that an extension of the Kualaka`i Parkway is slated to run directly through historic Ewa Field which is located within the Kalaeloa District. This former runway was the site of intense fighting on December 7, 1941 where American Marines fought back against Japanese warplanes. Tangible evidence of the battle in the form of strafing marks is still apparent in concrete pavers on the airfield and a battlefield survey is currently underway. I strongly urge, along with NTHP attorneys advice and consultation, that HCDA reconsider the proposed placement of the Parkway and plan to participate in the Federal and State review process to ensure that adverse impacts to the site are avoided.

In 2009, three Oahu neighborhood boards passed resolutions urging full preservation of historic MCAS Ewa Field as a park and museum to attract visitors to the location to benefit the local economy of Ewa West Oahu. The Hawaii State Legislature also passed a very similar resolution advocating the same preservation and heritage tourism concept for Ewa West Oahu. It does not appear that the HCDA Kalaeloa Administrative plan takes any note or makes mention of this widespread local community neighborhood board and state legislative concern and intent.

I would also like to include in my comments the Known Ewa Sites & Structures list provided by Elizabeth S. Merritt, Deputy General Counsel, National Trust for Historic Preservation, 1785 Massachusetts Ave. NW, Washington, DC 20036. These are shown below:

Known Ewa Sites & Structures in NAVY BRAC Transfer. Note: These areas have only received low level Phase II archaeology surveys and additional site surveys need to be done as well as Section 106 and an historic battlefield survey done by professional battlefield analysis experts.

- EWA FIELD (1925-1942)
 - o (Includes Approximately 2/3 of the FAA Site)
 - o Perimeter Property Line / Former Fence Line (1925 -1942)
 - o Southwest Extension to Main Ewa Field Runway (1941)
 - o Former Main Hangar 123 Bldg. Platform (1941)
 - o Hawaiian Habitation Complex (State No. 3721) (Just inside Perimeter Line)
 - o Sisal Walls Remnant (State No. 3722) (Just outside the Perimeter Line)

- MCAS EWA (1942-1952)
 - o (Includes Approx. 1/3 of the FAA Site)
 - o Perimeter Property Line / Former Fence Line
 - o Bldg. 137, Former Communications Splinter-proof Structure (ca. 1943)
 - o Bldg. 1545 Operational Storage, Quonset hut) (ca 1943)
 - o Bldg. 1146 Hangar (1944)
 - o Bldg. 1546 Operational Storage & Electrical Shop, Quonset hut) (ca 1943)
 - o Anti-Aircraft Battery WWII (State No. 5096)
 - o Anti-Aircraft Complex Remnants (State No. 5097)
 - o WWII Housing Complex Remnants (State No. 5099)
 - o Potential Former 5" Anti-Aircraft Gun Site, (Location South of Runway)
 - o Sinkhole Complex, near and along Coral Rd. (State No. 5094)
 - o Sinkhole Complex (State No. 5198)

- NAS Barbers Point (1942-1999)
 - o Bldg. 92, Bombproof Substation (ca 1942)
 - o Hawaiian Dune Burial Site Near Shoreline (State No. 5126)

- o Sinkhole Complex (State Site No. 5108)
- NAS Barbers Point Cold War Era Structures (1962-1999)
- Pride baseball Field – MCAS Ewa and later NASBP (1941-1999)

1925 Ewa Mooring Mast Field is one of the very oldest historic aviation sites and airfields in the State of Hawaii.

National Park Historian Daniel Martinez calls the December 7, 1941 Ewa Field "Sacred Ground."

The National Park Service is considering officially making MCAS Ewa Field part of the new WW-II "Valor in the Pacific" National Monument.

Significant oral history testimony has been collected from Ewa Village residents, many of whom are still alive, detailing the extensive air and ground battle over and around Ewa Field and Ewa Village on December 7, 1941.

In 1944 FDR toured MCAS Ewa Field in a convertible sedan, also carrying General Douglas MacArthur and Admiral Chester Nimitz. They turned off Fort Weaver Rd, came down Geiger Rd- and onto then North Hansen Road (to be named Roosevelt in the late 1950's) and visited the base. They also visited NAS Barbers Point, before returning back the same route to Honolulu.

Former MCAS Ewa is located by historic Ewa Village Plantation, on the State Historic Register, with the nearby Oahu Railway and Museum, on the National Historic Register, and with a likely National WW-II Battlefield designation, is destined to always have a more rural open space and historic character. Note too that developers of the Navy golf course, the Geiger Road re-alignment and the installation of the FAA navigation beacon all carefully avoided infringing upon the original 1941 December 7th airfield. This was because all of the land use planners and civil engineers knew then the site was very historic and important to save. This was not a coincidence, it was by design.

In December of 2010 a Face Book CAUSE was set up to advocate preservation of the Ewa Field battlefield and object to a roadway through the area. Within two weeks, over 1000 people had joined the Save Ewa Field cause nationwide. This is an indication, not always understood locally in Hawaii, that American Battlefields are considered as "Sacred Ground" to most mainland US residents, who are by the way, major visitors to Hawaii, and any construction through MCAS Ewa will be met with significant amounts of bad national publicity and public rancor among veterans groups.

1.18 15-215-18 Preliminary consultation with state historic preservation

Further Historic Advisement has been sought from the State Historic Preservation Division, Department of Land and Natural Resources under Chairman William Aila.

I have been so advised in correspondence of April 28, 2011 by the State Historic Preservation Division, Ross W. Stephenson, SHPD Historian, and Pua Aiu, Administrator, about concerns related to the former MCAS Ewa and NAS Barbers Point lands that have been part of the intended NAVY BRAC transfer to the City of 388 acres of land, including vacant property and a mixture of abandoned runways, warehouses, roads, Quonset huts, and other structures. This area includes the boundaries of Site 5127 (Ewa Field).

SHPD and the National Advisory Council on Historic Preservation have engaged in several discussions with the Navy and property grantees about historic resources on the former base. The Navy on October 28, 1998 (Ser 233/3957) agreed to include protective covenants to ensure preservation and appropriate treatments of historic properties. A December 12, 1998 letter from SHPD identified sites needing preservation or data recovery. A March 11, 2010 communication from the Navy BRAC office clarified that lot 13058-B would go to the City and County of Honolulu for park use. On April 20, 2010 SHPD recommended a conditional no effect determination that included recognition of eligibility for the National Register of Historic Places and protective covenants for the former Marine Corps Air Station (MCAS) Ewa (often referred to as "Ewa Field").

SHPD is currently awaiting a battlefield survey report on Ewa Field that has been completed by Mason Architects but not yet released by Hunt Development Group. We note that the North-South Road (Kualaka'i Parkway) and a major electrical transmission line as currently designed would bisect the Hawaiian Railway Society baseyard, Ewa Field, and the aircraft revetments just west of the Navy Golf Course. SHPD's letter of April 20, 2010 notes that the boundaries of Site 5127 (Ewa Field) should be expanded to include the entire former MCAS. The Navy's Historic Preservation Covenants include language declaring "Actions that would affect views, including adding new structure site elements such as towers, fences, or obtrusive signs, may also be considered to materially affect the Historic Properties". This same type of covenant should cover the seventy five aircraft revetments located west of the Navy's golf course currently used by the Barbers Point Riding Club.

1.19 15-215-19 Designation of historic and cultural sites

The Kalaeloa Draft rules, according to the Historic Hawaii Foundation, further limit the protection of historic and cultural resources by creating a narrow definition of historic and cultural resources. They would only allow those listed on the State and National Registers to be deemed historic or culturally significant and would use this new criteria to replace the earlier protections in the 2006 Kalaeloa Master Plan. The process of nominating historic properties is ongoing and never complete; and it is improper to assume that properties need to be on both State and federal registers. Draft rules 15-215-18, -19, -20, -21 deal with historic preservation. Historic Hawaii Foundation has a concern that these section intend to limit and restrict the existing legal processes and protections for historic and cultural resources, rather than reinforce or strengthen them.

The HCDA Kalaeloa Plan is very selective about what is defined as "cultural" and it is only defined basically as what is Hawaiian culture ONLY. Two Hawaiian organizations are the ONLY HCDA Kalaeloa cultural consultants and one else was apparently ever asked or allowed into this definition of cultural correctness for Kalaeloa.

The only "Heritage Park" is one that HCDA has designed as being officially recognized and supported with large amounts of public land, including Navy BRAC land that was originally going to the City. This large amount of land could have also been used in a possible land swap with FIP Hunt Corporation regarding the Ewa Field Battlefield site, but despite years of being aware of this issue no action was ever taken, despite many recommendations.

Despite being intended for full preservation, the "Heritage Park" in published articles makes mention of housing development, etc. down the road. It seems this is almost an "insider deal" of certain parties obtaining Navy BRAC land intended for conservation and recreation and using it for financial profit. The relationship between the HCDA Kalaeloa administration and the people

selected to manage this property seems extremely close and somewhat begs a possible ethics investigation, as well as a review by the City and the Navy BRAC office.

2.3 15-215-34 Special districts

An MCAS Ewa Historic District has been proposed in a Navy contracted cultural resource survey. This district comprising 75 aircraft revetments built in 1942, should be incorporated into all future Kalaeloa planning. The exact boundaries and historic significance are available through SHPD files and documents.

Two Historic Districts have been proposed in Navy contracted cultural resource surveys for NAS Barbers Point - A WW-II Housing Area and Central Core Historic District. These two districts should be incorporated into all future Kalaeloa planning. The exact boundaries and historic significance are available through SHPD files and documents.

15-215.5 Thoroughfares

The Kalaeloa Master Plan should intelligently use the existing historic MCAS Ewa base arterial roadways, expand them to four lanes and keep interior traffic LOCAL, which better fits the great descriptions of what Kalaeloa is supposed to be- a community encouraging slower 25 mph speeds, bikeways, etc. There is absolutely no reason to create a new roadway connection with the existing Saratoga Avenue and extend it across historic MCAS Ewa land and connect it with Geiger Road.

The extension of Geiger Road directly across and through the historic Ewa Field December 7 battlefield is completely unnecessary and will never be needed as a transit route because Geiger Road was intelligently aligned and connected to today's Roosevelt Avenue in the 1940's during the original design of the base. Traffic has flowed very smoothly on this same existing right-of-way for six decades since, allowing transit from Ewa all the way down Roosevelt to today's Kalaeloa Blvd- which is currently blocked off and should be reopened.

When the traffic eventually does increase, the answer is to make Geiger and Roosevelt four lanes- and not create a totally unneeded parallel roadway a couple of hundreds yards away in an important historic site which will only invite lawsuits.

There is also a major North-South historic right-of-way- Coral Sea Road, which could be expanded to be a significant four lane parkway and North-South connector- which it was in fact originally designed to be, and which could well satisfy the transit needs to reach the Ewa Coast beach parks and also serve as a second access roadway to the Haseko development allowing connection to Keoneula Blvd.

Currently, the segment of Kapolei Parkway between Kamokila Boulevard and Fort Barrette Road is not yet completed but will be constructed by the City & County of Honolulu. When this Kapolei Parkway segment is in place it will provide a continuous connection between Kalaeloa Boulevard and Geiger Road. The completion of the missing segment of Kapolei Parkway will have a substantial effect on the traffic volumes on Franklin D. Roosevelt Avenue, as some Ewa-Diamond Head traffic would divert from the existing two-lane road to the six-lane parkway. Kapolei Parkway is the preferred East-West commuter route while Franklin D. Roosevelt Avenue will serve well as an additional future four lane East-West transit route within Kalaeloa-Barbers Point communities.

Also noted from my research on historic preservation is the fact that the Department of Transportation Act (DOT Act) of 1966 includes a special provision - Section 4(f) - which stipulates that the Federal Highway Administration (FHWA) and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless the following conditions apply:

There is no feasible and prudent alternative to the use of land. The action includes all possible planning to minimize harm to the property resulting from use.

Section 4(f) of the Department of Transportation (DOT) Act of 1966 was set forth in Title 49 United States Code (U.S.C.), Section 1653(f). A similar provision was added to Title 23 U.S.C. Section 138, which applies only to the Federal-Aid Highway Program.

In addition the historic MCAS Ewa areas are also nesting grounds for the endangered Pueo, (*Asio flammeus sandwichensis*) – considered sacred by many Hawaiians. It is a widely recognized Hawaiian ancestral guardian known as aumakua. These birds are believed to protect individuals from harm, and even death. Disturbing their favored nesting areas would be extremely controversial and a subject of great public concern in the Ewa Community.

I have reviewed City comments on the Draft Kalaehoa Administrative Rules and concur with City DPP as listed below:

15-215.5(3) Thoroughfares

Suggest consistency with Act 54, SLH 2009, “Serve the needs of pedestrians, bicyclists, transit users, motorists and persons of all ages and abilities equitably and efficiently.”

15-215-37 Thoroughfare Standards

The proposed HCDA rights-of-way and associated sidewalk areas and median standards would be below current City standards, in particular Roosevelt Avenue and Kualaka’I Parkway extension. These roadways should be considered as arterial class roadways and should meet City standards.

15-215-37(I) Sidewalk Materials

The sidewalks should use City materials standards and there should not be any exceptions.

15.215-48 Street Trees

It is not clear who is responsible for maintenance and uplift problems with trees in rights-of-way. *Ficus Benjamina* trees are not allowed within City streets because of root damage to sidewalks and roadways.

15.215-51 (a and c) Exterior Lighting and Utility Standards

In recognition of environmental impact uplighting may have on the night sky relative to wildlife and human health, no portion of light emitted from a light source should extend above 180 degrees of its lowest point or above 90 degrees of its nadir.

It is also of great importance, according to advice of the NTHP attorneys, that there be no electrical or communication lines above or near the historic Ewa Field battlefield site which would obstruct view planes and future historic interpretation of the December 7, 1941 battlefield. All such electrical or communication lines should be placed underground in keeping with the Kalaeloa Master Plan.

15.215-59 Recreation Space

With respect for park space for dwellings, HCDA should use City park standards or better to require recreation space as well as landscaping and utilities to serve the facility.

Use Coral Sea Road- yet to be funded for improvement- that once improved- to be the route as the main thoroughfare extension for Kualaka`i Parkway makai/south of Roosevelt Avenue to connect to Keoneula Boulevard. This will preserve the ball fields and riding stables in Kalaeloa in order for them to maintain operations without further disturbance. Do not use the current configuration in this plan to extend Kualaka`i Parkway that abuts the ball fields and riding stables. Please open and advance Essex Road as a pedestrian thoroughfare (currently closed around the golf course) as well to connect to the Leeward Bikeway. All military sites must undergo Section 106 prior to being disposed of or liquidated.

The strength of this document to supersede the provisions of the city and county of Honolulu land use ordinance, the provisions of the Ewa development plan, and the provisions of the naval air station barbers point community redevelopment plan is questionable and does not appear to follow along the intent of the transfer to HDCA. It seems ambitious to plan for such a variety of mixed use (perhaps spot zoning) with a mandate to preserve the cultural history, protect the environment and its inhabitants in a regional park. The characteristics here do not describe anything to the mind's eye or give me a feel for the ambiance of a mixed use neighborhood.

Please re-consider the ratio of parking to occupancy rate. In Hawaii, even for apartment dwellers, there are numerous cases (see Waikiki on the Ala Wai Blvd. side) where more parking is needed than is normally provided within residential buildings. Also, with the occupancy rates for rooms on the West Side of the island, it is not uncommon to have more than the "normal" occupancy rate to accommodate for larger family sizes. It would be unfortunate to not consider the reality of living accommodations on the West Side

Native wiliwili trees should also be allowed within the area. It is not only a native species but the seeds may be a resource for those who work with the seeds to make leis, etc. Also, as the trees are trimmed, the wood can be re-used for various native Hawaiian products.

It seems like HCDA is doing the work of City DPP in many cases, and since much of this Kalaeloa public area will ultimately be transferred to the City, HCDA should be using City guidelines.

In closing there still remains a question of HCDA adequately addressing public input and not just being a vehicle for what developers want. This is public land, not private land, and significant development in Ewa West Oahu requires transparency and an honest public hearing process and honest and timely addressing of public comments before final decisions are made. Mahalo and thank you for allowing me to comment on this very important Council District 1 development project.

Sincerely,

CM Tom Berg

A handwritten signature in black ink that reads "Tom Berg". The signature is written in a cursive style with a large, prominent "B".

Councilmember – District 1
Ewa Beach, Kapolei, Waianae Coast