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Mr. Aaron Y. Poentis

Environmental Program Director (N45), Navy Region Hawaii/

Environmental Business Line Coordinator (EV),

Naval Facilities Engineering Command

400 Marshall Road

Pearl Harbor, HI 96860-3139

Aloha Mr. Poentis,

Thank you very much for requesting comments on the Kalaeloa Renewable Energy Park - Environmental Assessment (KREP) - 2nd Draft.

I have been hearing from my district constituents that the Environmental Assessment document is extremely large and difficult to download and view. Can't there be a way to break this huge document up into smaller sections that are easier to download and view?

In addition, the 15 day comment period isn't sufficient time to review this large amount of information and more time should be provided to the community to review this important Environmental Assessment. An additional 15 days would be best at a minimum.

On the topic of Programmatic Agreement comments and meeting minutes, we received a later set of comments that were sent out which apparently weren't included in the earlier PA release announcement and are interested to know if there are additional comments forthcoming for review by the community, and if as promised, we would be able to review the meeting minutes for all of the past Section 106 meetings before making a decision to sign off on the Programmatic Agreement.

More relevant information continues to come out that appears to directly affect the language and stipulations concerning the Ewa Field KREP Programmatic Agreement. Our friends at the aviation museum on Ford Island have asked for stipulations in the proposed photovoltaic solar energy farm that would require any such construction on the Ford Island runway to be completely reversible using widely available construction techniques that do not penetrate the surface and damage the historic WW-II runway.

Why aren't these same reversible construction techniques being used at the Ewa Field site, rather than extensive ground penetration? I believe we should be adapting some of the historic preservation stipulations in the Ford Island project to the Ewa Field KREP site.

My district represents the largest native Hawaiian community in the world and they are extremely concerned about their cultural heritage and areas of traditional cultural practices and burial sites.

One of my most valued advisors on native Hawaiian cultural practices is Ewa Beach resident Mike Lee, who is a native Hawaiian practitioner recognized by the Oahu Burial Council, Office of Hawaiian Affairs and member of the Kanehili Cultural Hui based in the Ewa community. Mr. Lee has long advocated for his traditional cultural rights under law and has won in the courts for his recognized standing on native Hawaiian cultural rights.

The State of Hawaii Preservation Division (SHPD) has stated that the Kanehili area *Leina a ka Uhane* wahi pana, located in areas within former MCAS Ewa, is indeed an important National Register eligible Historic District under NPS NR criteria A and B. I do not see how we can ignore this very important recognized native Hawaiian sacred cultural site and traditional cultural place (TCP) regarding discussions of an Environmental Assessment and final Programmatic Agreement for the Ewa Field KREP project.

The State of Hawaii Preservation Division stated in their letter to the Honolulu Authority of Rapid Transportation (HART) that Limu gathering is a traditional cultural practice and the area where Mr. Lee gathers limu is potentially eligible as a TCP and suggests that additional consultation regarding the Leina Ka 'Uhane wahi pana cultural and historic district occur before any construction takes place.

In the HART Programmatic Agreement, which I believe should apply equally as well in the Ewa Field KREP project, requires HART to undertake a study to determine previously unidentified Traditional Cultural Places (TCP's) within the Area of Potential Effect, which includes cultural landscapes. The HART PA does not limit traditional cultural places to Hawaiian TCP's only, as there are traditional cultural places of other cultures as well, such as the extensive pre WW-II Ewa Sisal plantation and Ewa Plains cattle ranching operations.

The HART Programmatic Agreement requires that all fieldwork, eligibility and effect determination and consultation to develop treatment measures be done prior to the commencement of any construction, and I believe this should apply as well to the Ewa Field KREP site. Geotechnical borings by HART have indicated that the east Kapolei railway station, which is the closest to Ewa Field penetrates into the coralline deposits. In the Ewa Field KREP area we should be doing a full up to date 2012 archeological and cultural survey with the use of non-invasive ground penetration technologies.

In closing, I would also like to point out that the Honolulu City Council just recently voted unanimously, August 12, 2012, to pass my sponsored Ewa Plains Trails resolution 12-172, "Urging the Hawaii Community Development Authority and the State of Hawaii to recognize and preserve the historic trails of the Ewa Plains."

I have seen for myself that ancient native Hawaiian trails, as identified in the 1825 Malden survey, still exist in the former MCAS Ewa area. And as well, the later historic plantation foot trails and cattle ranching horse trails that are still in use there today. These trails represent the still existing overlays of traditional cultural places and traditional cultural practices of living native Hawaiians such as Mike Lee and his students and the medicinal and gastronomical limu they still gather from this same sacred Kanehili and Onelua area.

Mahalo and thank you for allowing me to comment on this very important Council District 1 project. My final comments will be forthcoming after receipt of Section 106 comments and minutes of the Section 106 meetings.

Aloha,

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

TB:nc