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November 23, 2011

Ellyn P. Goldkind, RA  
Historic Preservation Officer  
Navy Region Hawaii / NAVFAC Hawaii  
400 Marshall Road  
Bldg. X-11, Code EV5  
Pearl Harbor, HI 96860-3139

RE: Determination of Effect - Kalaeloa Renewable Energy Park, or "LLC"

Dear Ms. Goldkind,

Addressing Proposed Ways to Avoid, Minimize, or Mitigate Adverse/Unknown Effects:

*1. Explore agreements with adjacent landowners that may eliminate transmission line crossing of southeast runway corner.*

Of single greatest concern is the lack of a coherent HCDA HECO Power Energy Corridor to serve a significant number of planned solar farms in and around the former MCAS Ewa area. The current Kalaeloa Renewable Energy Park (the "LLC") plan is to run a 46 Kv line through lower Ewa Field with a roadway for HECO utility use. This same Ewa Field route is very likely to become the route all the other Solar Farms will use once HECO installs this initial route.

This will be a big mess and blight. The Energy corridor should be either along Essex Road, or more logically- down Coral Sea Rd. which runs to the Coast Guard Station. This is the most logical energy route for Power and energy farm development- not through Ewa Field.

Water lines and site access should be through the road currently known as Bismarck Sea, Rather than running a new road off of Essex Road. This is entirely unnecessary and too invasive.

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

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original design of the base. 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.

The adopted HCDA Master Plan says Kalaeloa will be a PONO and beautiful "Center of Excellence" and calls for all utilities to be UNDERGROUND, so as to not blight the landscape with a 19th century look. But this is exactly what HCDA plans for the former MCAS Ewa area; to allow overhead high voltage power lines throughout this Kalaeloa land area- just for a "temporary 20 year period," which could likely be extended indefinitely.

The clear answer should be that HCDA follows its own Master Plan and require high voltage power lines installed UNDERGROUND along side of Coral Sea Road as they are currently planning with the Enterprise Road Energy Corridor. HCDA will be creating a visual blight of 60 foot poles and possibly even steel towers that will make Kalaeloa look like a Pittsburgh industrial area. Burying power lines actually has many advantages, as indicated on HECO's own website. HECO owns about 3000 miles of electrical transmission and distribution lines. More than 40% of these lines are already underground. The Ford Island 46 Kv power line is an underground line because it protects the view planes around historic Pearl Harbor, which is a National Landmark.

*2. Perform on-site archeological monitoring for all ground disturbing activities; and in collaboration with SHPD archeologist and the National Park Service Battlefield Protection Program, develop a remote sensing testing plan to aid in defining WWII battlefield boundaries and event locations.*

I strongly support SHPD's ability to place conditions on the otherwise free use of historic properties within Kalaeloa. This 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. Not allowing the public adequate time to review and process actions that may damage historic properties is not an acceptable public policy.

*3. Improve access to the concrete warm-up platform by removing and keeping clear of all vegetation and debris. Allow scheduled visitation/use for non-profit groups [that maintain corporate liability insurance] to facilitate interpretation and commemorative activities at the site.*

My District 1 Council office intends to address this in a separate action which also engages the City, which will be expected to take possession of a significant portion of the concrete ramp and adjacent historic MCAS Ewa buildings and properties.

*4. Provide financial support (contribution pledge from FIV) to initiate development of an Ewa Field Task Force focusing on Ewa Field's History and role in the events of December 7, 1941.*

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My District 1 Council office would like to suggest that a relationship with Pacific Historic Parks, formerly Arizona Memorial Museum Association, be established and that an Ewa Field Battlefield 501-c-3 work with Pacific Historic Parks, which has extensive battlefield park management experience, including fund raising, bookstore and educational program development.

Ewa Plantation Villages has been previously recommended by noted historians to be a National Landmark and made a federally recognized Historic District. We need to continue to move forward with preservation plans for the Managers Mansion and maintain the unique historic character of Ewa Villages which make it an historic and architectural treasure.

*5. Due to known historic resources and any potential for archeological finds, the project has been designed to incorporate fully reversible and modern renewable energy features while minimizing ground penetrations or excavations.*

Instead of digging holes for fence posts, using concrete bases should be considered to anchor the chain link fence.

Finally in 2011, an Ewa Battlefield Survey was conducted and completed indicating a significant area of MCAS Ewa was the site a December 7, 1941 battle, and an area of subsequent WW-II era support structures listed in the survey as Ewa Field Warehouse District and Ewa Field Aircraft Revetments, all potential National Register sites. Also noted were the significant Ewa Field Cold War era buildings located near the original front gate that could also become listed on the National Register. In addition there was near this same area the 1943 Squadron Wall structure, a local Ewa landmark, which the Navy apparently authorized to be destroyed just before the start of the Section 106 hearing process.

The Ewa Battlefield Survey stated numerous times that all the findings were just "preliminary." The National Park Service comments also state: "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."

In May 6, 2009, MCAS Ewa preservation resolution bill HCR49 was passed by the Hawaii State Legislature, and also with similar wording previously by three other local Oahu Neighborhood Boards:

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

Between the three locally elected neighborhood boards and the representatives and senators of the Hawaii State Legislature, it could not be more clearly stated that the preservation of the Ewa Field

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battlefield and the historic MCAS Ewa structures is what the Ewa public wants. This isn't an anti-development agenda; it is about preserving areas that have great local meaning and significance.

An Ewa Field battlefield park would require years of development, Dec. 7, 1941 history is the single largest visitor attraction to Oahu- bringing millions of dollars of revenue every year. An Ewa Field battlefield park would be joining an already well established and highly successful visitor attraction model in a West Oahu region where Ko Olina resort hotels bring in loads of sight seeing tourists. An Ewa Field battlefield park could partner with the National Park Service and Pacific Historic Parks (USS Arizona), which already helps NPS run battlefield parks in the Pacific. We wouldn't have to invent new programs or concepts- the money and expertise is already locally available.

Aloha,

A handwritten signature in black ink that reads "Tom BERG". The signature is written in a cursive style with a prominent horizontal line above the name.

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

TB:ge