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Oct 5, 2011

Mr. Alapaki Nahale-a, Chairman
Linda Ching, Administrator
Dept. of Hawaiian Home Lands
91-5420 Kapolei Parkway
Kapolei, HI 96707

Dear Mr. Nahale-a,

Thank you very much for allowing comments on the DHHL Ka Makana DeBartolo Shopping Center Environmental Assessment.

http://oegc.doh.hawaii.gov/Shared%20Documents/EA_and_EIS_Online_Library/Oahu/2010s/2011-09-08-DEA-Ka-Makana-Alii-Conceptual-Master-Plan-in-Ewa.pdf

Attached are photos and renderings that are in the DHHL Ka Makana DeBartolo Shopping Center Environmental Assessment (see email.)

The Hawaiian Railway Society are opposed to the numerous roadway crossings and crossing gates and have apparently discussed their concerns with DHHL, SHPD, and DeBartolo recently, indicating that the railway is on the National Historic Register and if the roadways are put in as planned, they could be possibly tied up all day with train cars going back and forth within the railway yard.

This classic 1880's narrow-gauge railway, which goes back to the era of King Kalakaua, has enormous visitor attraction potential. Chopping it into pieces with way to many grade crossings will create an operational nightmare and destroy this great historic treasure.

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.

The MCAS Ewa Field area is currently undergoing a significant historic reevaluation by the Navy, National Park Service, SHPD, and various local consulting parties as part of a

Federal Section 106 process. The evaluation of Ewa Field as a December 7, 1941 battlefield, could likely lead to a National Register listing and possible future nomination as a National Battlefield, National Landmark and become part of the WW-II Valor in the Pacific National Monument. This is how previous Pearl Harbor battle sites have been treated, and MCAS Ewa Field meets all of the NPS American Battlefield Protection Program criteria.

The DHHL DeBartolo EA has various visual examples of what the proposed DeBartolo hotel complex might look like and indicates it could be a high rise hotel up to 120 feet high, blocking the historic view plane from Ewa Field of the Waianae Mountains where the main Japanese Kate bombers and Zero fighters approached from to attack Ewa Field and Ewa Village.

The DeBartolo renderings show various types of hotel structures- long and low, twin towers, etc. It would seem that a final design has not been determined, so there appears to be time to reevaluate a possible 120 foot high hotel structure.

Attached is a rendering of the new FBI building currently under construction near Fort Barrette road. When you drive by it seems to look extremely high already, but is actually just four stories. This seems like an appropriate maximum height for a building in this area, especially being by the Kalaeloa civil aviation airport and Honolulu International Airport approach path.

Also attached is a rendering of what the area might look like in approximately 10-15 years with a rail transit station nearby. Note that nearly all the buildings are no higher than four stories. This seems an appropriate height for the development of the Ewa Plains area, as tall buildings cast long shadows, and a tall DeBartolo hotel would be casting long morning and afternoon shadows over adjacent areas, blocking their views and sunlight.

It is important to remember also that Kalaeloa-John Rogers Field has an airport operations area that is *under* the Honolulu International Airport instrument landing approach path. The Federal Aviation Administration Instrument Landing System beacon is located right next to the former MCAS Ewa Field runway, which means large heavy commercial jets are approaching *inbound* to Honolulu and coming over this location at around 2-3000 feet, maybe less.

Underneath that same HNL approach path are civil and Coast Guard aircraft in the John Rogers Field Kalaeloa airport control area which extends up to 1500 feet. Often small planes and helicopters are coming through the Ewa Field area and in the vicinity of the DHHL DeBartolo complex, approaching Kalaeloa airport, at 500 feet (and sometimes less.)

If DeBartolo proposes to construct a hotel up to 120 feet high in this same area, near the Hawaiian Railway yard, this would both block the view of the Waianae Mountains from Ewa Field, but also be a possible aviation hazard. To try and mitigate this the building would likely have to be wired up with flashing lights to warn away low flying aircraft.

It should be realized also that aircraft traffic all day and in the evening could be a constant annoyance to hotel guests in a tall building that is close to these air traffic lanes with both heavy commercial HNL inbound jets coming over at 2000 feet while smaller JRF (Kalaeloa) aircraft are flying underneath them at around 500 feet- all passing right by and over this high rise hotel in the middle of two different airport approach paths.

I believe out of caution and awareness of the nearby historic sites- Hawaiian Railway, Ewa Plantation Village and MCAS Ewa Field- that any planned DeBartolo hotel structures should ideally be kept much lower- at around four to five stories. The hotel would better serve the community and Ewa Plains history with a long, low structure rather than a high rise structure.

A roadway connection option for DeBartolo, which has already dug very deep underground parking areas, is to come out *under* the railway line and join to Roosevelt Avenue, which could provide further access to Coral Sea Rd. Coral Sea Road should become a four lane parkway in the future, and there is already an existing right-of-way which could allow it to be connected to Kapolei Parkway. This should be the preferred connectivity route- not an extension of Kualaka'i - NS Rd to Roosevelt.

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, hangars 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 it's 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 hangars. 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 of their conception.

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.

"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 the 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.

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.

Note also 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 Navy land use planners and civil engineers knew then the site was very historic and important to save. This was not a coincidence, this 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 met with significant amounts of bad national publicity and public rancor among veterans groups.

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 within former MCAS Ewa.

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 Navy BRAC 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.

Future 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 roadway 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 the 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 staff 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:

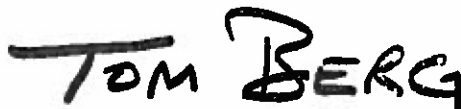
There is no feasible and prudent alternative to the use of land. The action includes all possible planning to minimize harm to the property resulting from use.

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 closing, please continue to engage and inform my office and the Ewa Plains community for further public input as your plans progress forward.

Mahalo and thank you for allowing me to comment on this very important Council District 1 development project.

Aloha,

A handwritten signature in black ink that reads "TOM BERG". The letters are bold and slightly slanted, with a casual, personal feel.

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

TB:ge

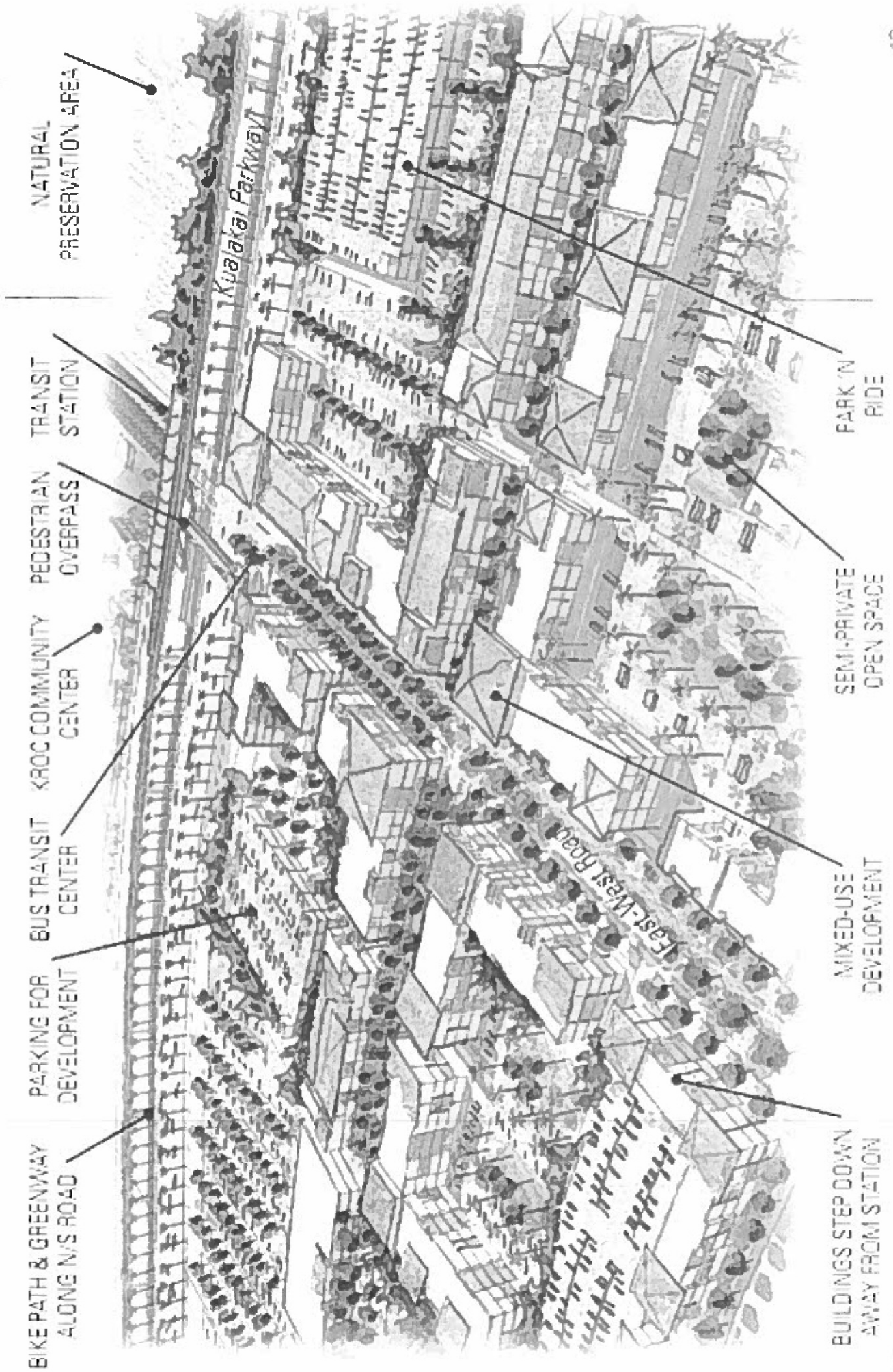


FIGURE 19 - Conceptual Illustration - East Kapolei Station



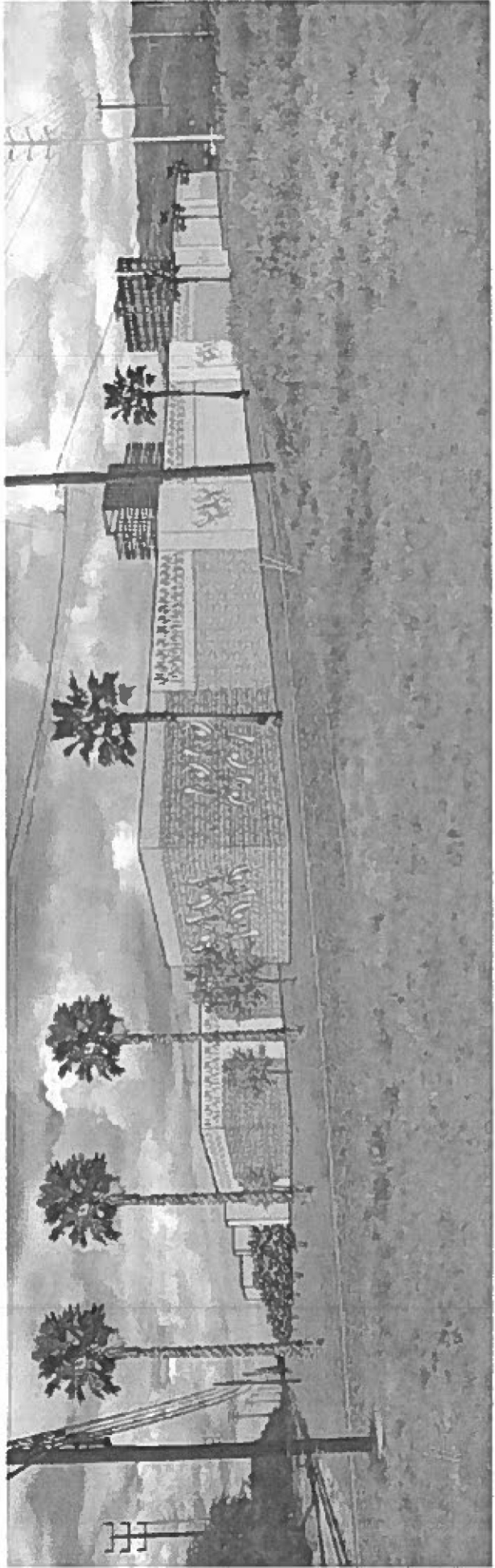


FIGURE 11 - VIEW TO THE NORTHWEST

CVL 2

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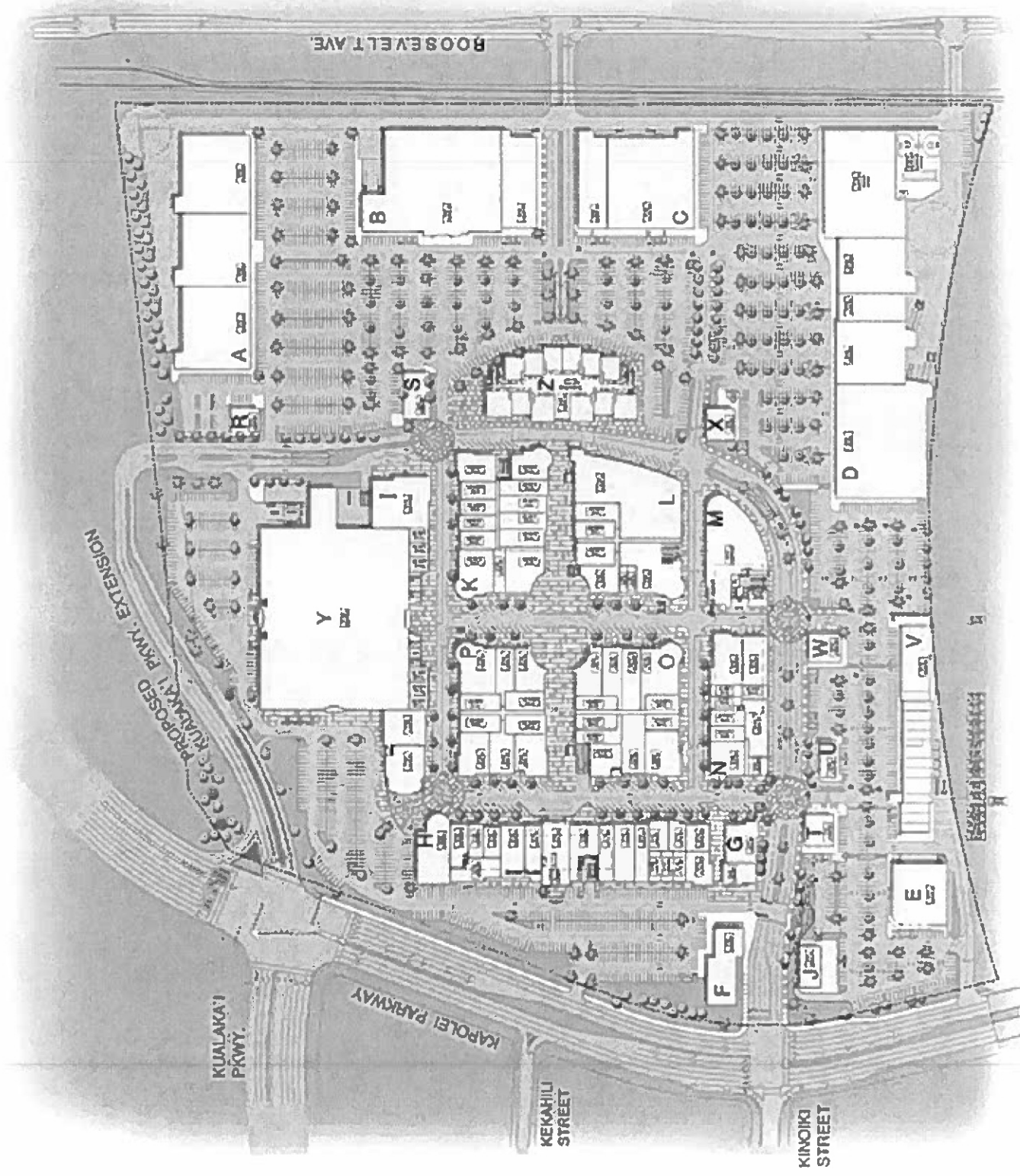


FIGURE 5 - CONCEPTUAL SITE PLAN

KA MAKANA ALI'I
 Kapolei, Oahu



H-1 Freeway

Ft. Weaver Rd

Kualakaili North South Roadway

Kapolei Parkway

Original Ewa Plantation Villages

Hawaiian Railway

1943

Squadron Wall

Original Gate and Flagpole

Original 1941

Ewa Field

Concrete Aircraft Ramp

DHHL - DeBartolo

Hotel Shopping Complex

Original MCAS Ewa Pride Baseball Field

Rosevelt Avenue

MCAS Ewa Historic Warehouse District

Coral Sea Rd