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November 2, 2015

Via E-mail: [Megan.Borthwick@hawaii.gov](mailto:Megan.Borthwick@hawaii.gov)

Dr. William Chapman  
Chair, Hawaii Historic Places Review Board  
c/o Megan Borthwick  
Hawaii State Historic Preservation Division  
601 Kamokila Boulevard, Unit 555  
Kapolei, Hawaii 96707

**Re: Ewa Plain Battlefield Nomination**

Dear Dr. Chapman:

Kalaeloa Ventures, LLC ("Kalaeloa Ventures") provides this testimony to the Hawaii Historic Review Board ("Board") for consideration in anticipation of the Board's review of the application to nominate the Ewa Plain Battlefield for listing on the National Register of Historic Places.

Kalaeloa Ventures is currently the lessee of a significant portion of the land contained within the proposed boundary for the Ewa Plain Battlefield. While the land within the proposed Ewa Plain Battlefield is currently owned by the Department of the Navy, Kalaeloa Ventures' lease with the Navy states that Kalaeloa Ventures will become the fee owner of the land within the Ewa Plain Battlefield currently under Navy ownership. Accordingly, any decision on this application and nomination for listing will have a direct impact on Kalaeloa Ventures, as the current lessee and future owner of the land.

The current application in front of the Board proposes the nomination and listing of a 180-acre area comprised of the fenced boundary of the 1941 Ewa Mooring Mast Field ("Ewa Plain Battlefield") to the National Register of Historic Places. For the following reasons, Kalaeloa Ventures asks the Board to reject or defer the current nomination:

- First, the boundary set forth in the application for the Ewa Plain Battlefield includes resources that were not significant to the attack on December 7, 1941 that cannot and should not be included within the nomination. The Japanese attack on December 7, 1941 on Ewa Mooring Mast Field was an early morning aerial attack concentrated on destroying the aircraft parked at Ewa Mooring Mast Field. The purpose of the attack was to destroy and ground any American aircraft that could otherwise become airborne. There is no indication in the record that the Japanese were targeting anything other than the location of the airplanes. All of the airplanes were parked in the area of the concrete warming up platform and the asphalt mooring apron at the time of the attack. This limited area was the focus of the attack. Today, the only visible damage to Ewa Mooring Mast Field from the December 7, 1941 attack is on the concrete warming up platform. All across the island of Oahu on the morning of December 7, 1941, the people of Hawaii took cover from the Japanese airplanes flying above.

To expand the boundary of any area listed beyond that of those areas of the core battle is inconsistent with the requirements for the listing of battlefields.

- Second, as a whole, the Ewa Plains Battlefield lacks the integrity required to be eligible as a battlefield site in connection with the December 7, 1941 attack. Prior studies conducted on the area have concluded that the integrity of the individual resources within the Ewa Mooring Mast Field are substantially diminished and may not be supported for National Register eligibility. Specifically, in 2011, AECOM and Mason Architects, Inc. ("MAI") conducted a comprehensive battlefield evaluation for Ewa Field and concluded that "Ewa Field retains **minimal** integrity as a battlefield site." See AECOM & MAI 2011, *Battlefield Evaluation of Ewa Field, Inventory and Historic Contexts* ("2011 Battlefield Evaluation") (emphasis added).

To be listed as eligible on the National Register, the Proposed Battlefield Site must be both: (1) significant to the December 7, 1941 attack; and (2) retain its integrity. See National Register Bulletin 40, *Guidelines For Identifying, Evaluating And Registering Battlefields* (rev. 1999); see also National Register Bulletin 16a, *How to Complete the National Register Registration Form* (1997) (Boundaries should "include only portions of the site retaining historic integrity and documented to have been directly associated with the event"). The basic test of integrity for a battlefield is whether a participant in the battle would recognize the property as it exists today. See National Register Bulletin 40. In this case, whether the proposed site retains sufficient integrity is answered by whether a participant in the battle on December 7, 1941 would recognize the property as it exists today. Except for the concrete warming up platform that has visible damage from the attack which is still visible today, the answer to this question is no.

The proposed contributing resources in their current state are in such a diminished and degraded condition that they no longer convey significance to the December 7, 1941 attack. An aerial view of the area today shows that the mooring apron is no longer visible as it has been destroyed by extensive overgrowth of trees, brush and vegetation, so much so that the area looks more like a grove of kiawe trees than remnants of an asphalt apron. The current aerial view of the 1941 runways illustrates that the runways are barely visible today due to the degradation that has occurred over time. The 1941 hangar 123 foundation that was under construction at the time of the December 7, 1941 attack is also no longer present. The swimming pool that was used as a defensive position during the December 7, 1941 attack was long ago destroyed. Those features of the pool that may remain today were not central to the battle as the pool was only forms at the time of the attack and had not yet been constructed. The tent/camp area that was once located within the base boundary has also long since been lost. In its description of the current conditions of the resources, the application acknowledges that there is little left within the former 1941 Ewa Mooring Mast Field that has not been overgrown by trees and vegetation, or that still exists and is visible from the surface. Accordingly, the boundary being proposed for listing is overly inclusive of areas that no longer retain the integrity necessary for listing on the National Register.

- Third, the nominated Ewa Plains Battlefield is inconsistent with and does not meet National Park Service standards and guidelines for the registration of historic sites. In determining the boundary for a historic site, the National Park Service provides the following guidelines:
  1. The boundary for a proposed site must encompass, but not exceed, the full extent of the significant resources and land making up the property;
  2. The area to be registered should not include "buffer zones" or acreage not directly contributing to the significance of the property; and
  3. Peripheral areas of the property that no longer retain integrity should be left out.

National Register Bulletin 16a, *How to Complete the National Register Registration Form*.

The boundary being proposed violates all of these guidelines. The boundary extends beyond the parameters of the significant resources within the battlefield. The proposed boundary includes land that is not directly contributing to the significance of the property. Finally, the proposed boundary includes peripheral areas of the property that no longer retain integrity that should be left out.

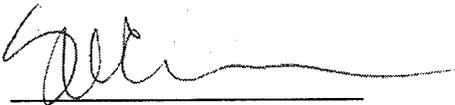
As evidenced by the issues set forth in this letter, the current nomination goes beyond the guidelines that have been set up for evaluating whether a property or area should be listed on the National Register. While the December 7, 1941 attack is of importance to both our National and State history, it is imperative that we still question and evaluate whether the entirety of the area being proposed for nomination truly retains the integrity and significance in its current condition to the December 7, 1941 attack to merit listing on the National Register.

We appreciate the Board taking these comments into consideration.

Sincerely,

Hunt Development Group, LLC  
A Texas Limited Liability Company

By: \_\_\_\_\_

  
Steven W. Colón  
Authorized Signatory

