

Written Direct Testimony of Ruth Aloua

My name is Ruth Aloua and I am a Kanaka Maoli (Native Hawaiian) and cultural practitioner from Kailua-Kona. I received my Bachelor of Arts in Anthropology from the University of Hawai'i at Hilo in 2011. Three years later in 2014 I graduated from Simon Fraser University in British Columbia, Canada with a Master of Arts in Archaeology. I have worked as an archaeologist for private firms and the National Park Service. The knowledge that I gained through these experiences is implemented through community organizing and through the restoration of Kaloko Fishpond where I am a kia'i loko (fishpond guardian). When not in the fishpond or attending community meetings, I spend my time farming as an organic farmer growing a wide range of produce and raising pasture animals. My knowledge and skills range from familiarity with archaeological and anthropological practices, policies, management plans, at the county, state, and federal level, agriculture and aquaculture food production, to place-based knowledge grounded in the people, place, and culture of the Kona District.

My testimony provides insight into several issues regarding missing assessments, inaccurate findings, questionable conclusions and inconsistencies made by researchers regarding the archaeological resources and cultural practices associated with Mauna Kea.

Issue 1: Missing a Thorough Evaluation of Impacts to the Mauna Kea Historic District

The State Historic Preservation Division stated that "Within the historic district, the significance of properties is not evaluated individually because the summit region as a whole is considered eligible for inclusion in the National Register. Instead, the required assessments consider how each newly or previously recorded property potentially affected by a project contributes to the significance of the historic district as a whole" (SHPD 2000:20). Despite these directions, the reports neglect to evaluate how the Thirty Meter Telescope will impact the Mauna Kea Summit Region Historic District (Hammatt 2011; University of Hawai'i 2010). Because "the Mauna Kea Summit Region Historic District is significant under all four National Register criteria, and criterion "e" of the Hawaii Administrative Rules, Chapter §13-275-6" (McCoy et al. 2009:2-49), it seems appropriate for each criteria to be addressed. The report should be deemed incomplete until these evaluations are provided.

Issue 2: Conclusions of Area E Survey Findings as "Contemporary" Require Further Examination

The archaeological inventory survey states that two potential historic properties, CSH 1 and CSH 2, were identified within survey Area E. I have questions regarding the conclusions made in report findings.

CSH 1 was initially interpreted to be a pre-contact shrine, but upon further inspection determined to be contemporary because "prior surveys undertaken by McCoy within the current survey area that did not identify the feature" (Hammatt 2011:39). This determination is questionable because archaeological surveys are known to miss archaeological features even

when, trained, well seasoned archaeologist familiar with Hawaiian archaeology conduct surveys. Although it is possible that this pre-contact shrine was missed in surveys conducted by McCoy, this possibility is not addressed in the report. Furthermore, this determination lacks references to archaeological surveys conducted by McCoy that support his statement. Knowing that such a determination can lead to the destruction of a non-renewable resource, it only seems fair that references to previous surveys be made for further investigation. I also have issues with this determination being taken as fact without feedback from traditional cultural practitioners. Those who are familiar with the place could also provide insight that can verify, deny, or provide information leading to further research. These three issues give merit to further inspection of CSH 1 as a pre-contact shrine.

CSH 2 was initially interpreted to be a pre-contact temporary habitation complex that consisted of a C-shaped enclosure with small terraces. However, after further examination, was determined to “most likely represent natural geological features that only appeared to have been man-made” (Hammatt 2011:39). Though the report states that a site visit with SHPD was conducted, I have issues with this interpretation being made without photo documentation provided in the final report. Without photos I and others cannot assess the validity of this conclusion. I also have issues with this determination being taken as fact without feedback from traditional cultural practitioners. As mentioned above, these individuals can provide insight that can verify, deny, or provide information leading to further research. These two issues give merit to further inspection of CSH 2 as a pre-contact temporary habitation complex.

The determination that CSH 1 and CSH 2 are not historic properties deserves further inspection. Evidence used to substantiate these claims is lacking. For these reasons these finds should have been determined as “find spots” that could not “be classified with any level of confidence as historic sites because of their uncertain age and function (e.g., a pile of stones on a boulder)(McCoy et al. 2009:5-14)” leading to further consultation . Until the issues mentioned above are addressed I suggest that any activity that would forever damage these archaeological resources be halted.

Issue 3: Assessment of Visual Impacts to Mauna Kea Summit Region Historic District Questionable

The Thirty Meter Telescope final environmental impact statement states:

“the TMT Observatory will add a new visual element to the northern plateau area...visible to varying degrees from the northern ridge of Kūkahau‘ūla, Pu‘u Pōhaku, Pu‘u Poli‘ahu, and some of the historic shrines and other historic properties along the northern slopes of Maunakea. The TMT Observatory will appear in the view directly toward the summit from only a few of the shrines on the northern plateau” (University of Hawai‘i at Hilo 2010a:3-50)

Despite these visual additions, the FEIS claims that the development will be “less visible” within the historic district. The report goes on to claim that “the potential visual impact [from the TMT]

to the Historic District and its contributing properties are not anticipated to be significant” (University of Hawai‘i at Hilo 2010a:3-50). This conclusion is questionable because if built, the TMT would add a new visual element to three pu‘u and historic shrines, be the largest structure on Mauna Kea, and be built in a previously undisturbed area. These three points contradict the claim made in the final document. A thorough assessment of the visual impacts of TMT to the Mauna Kea Summit Region Historic District should be completed. This assessment would consider the cumulative impacts of an additional astronomy facility on the historic district and to historical sites located outside of the historic district.

Sources Cited:

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