



March 6, 2022

Naval Facilities Engineering Systems Command
Attention: Andrea Von Burg Hall
258 Makalapa Drive, Suite 100
Joint Base Pearl Harbor-Hickam, HI
96860-3134

By Electronic Submission <https://www.pearlharbordrydockeis.org/#!/publicComments>

Re: Comments to the Draft EIS for Pearl Harbor Naval Shipyard and Intermediate Maintenance Facility Dry Dock and Waterfront Production Facility at Joint Base Pearl Harbor-Hickam, Oahu, Hawaii, February 2022

Aloha Andrea,

I am writing on behalf of Ke One O Kākuhihewa, the O'ahu Council of the Association of Hawaiian Civic Clubs, which carries the legacy of Prince Jonah Kūhiō Kalaniana'ole, who founded the oldest Native Hawaiian community-based advocacy movement, in 1918, through the Hawaiian Civic Club of Honolulu. Today, the movement is represented by a confederation of individual and autonomous Hawaiian Civic Clubs located across Hawai'i and across the continental United States.

The O'ahu Council has a longstanding relationship with the U.S. Navy that stems from our founder, Prince Jonah Kūhiō Kalaniana'ole, who, as a Delegate to Congress, successfully lobbied for the millions of dollars needed to develop Pearl Harbor. It has deepened, over the years, to include landmark partnerships between the Navy and our partner clubs to restore traditional ecological knowledge in Kalaeloa (Kalaeloa Heritage Park), Kalauao (Loko i'a Pā'aiau), and in annual celebrations of Makahiki. Most of our members have ancestors who served honorably in the military, and many of us have husbands, wives, children and mo'opuna who chose a career in service. We honor their sacrifices.

As a Concurring Party to the Programmatic Agreement among the Commander Navy Region Hawaii, the Hawaii State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Shipyard Modernization for the Pearl Harbor Naval Shipyard and Intermediate Maintenance Facility, Joint Base Pearl Harbor-Hickam, Hawaii, we have a deep appreciation for the cultural and traditional history of the entire Pu'uloa area, and, particularly, the project area that once housed three traditional fishponds beloved by our Native Hawaiian ancestors, for centuries. In 2019, representatives of our member club, Ali'i Pauahi Hawaiian Civic Club (APHCC), bestowed the Hawaiian name, **Keaoonāmanō, The Realm of the Sharks**, on Dry Dock 1, and participated in the Navy's blessing and 'awa ceremony, to honor the ancestral guardians who lived in the space and protected the people from the man-eating sharks and all harm.

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Chapter 4 of the Draft EIS pertains to potential mitigation measures for consideration to minimize or offset adverse impacts from the proposed project. Loko i`a Pā`aiu's historical importance, as the home of our chiefess, Mō'i Wahine Kalanimanu`ia, and one of the last remaining ancient fishponds in Pearl Harbor, is an irreplaceable historic site that offers unparalleled mitigation opportunity. We wholeheartedly echo the Ali'i Pauahi Hawaiian Civic Club's recommendations for full restoration of the fishpond, as articulated in the 10-year plan which it submitted on February 24, 2022, in any mitigation plan.

Mahalo for your serious consideration of our comments. Please feel free to contact me (email: kakuihewa.president@gmail.com, 808-349-3636), if you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Benton Kealiikiamoku Pang".

Benton Kealiikiamoku Pang, President

Cc: Kēhaulani Lum, Ali'i Pauahi Hawaiian Civic Club