



University of Hawaii at Manoa

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Office of the Director

June 21, 1979

RP:0012

Colonel Peter D. Stearns, District Engineer
Department of the Army
Honolulu District
Corps of Engineers
Building 230
Fort Shafter, Hawaii 96858

Dear Colonel Stearns:

PODCO-0 1506-SD
Kahaluu Fishpond Renovations
Kahaluu, Oahu

We have briefly reviewed the above cited public notice regarding the request for a permit to perform certain renovation/restoration work at Kahaluu Fishpond.

Several concerns have come to our attention which you may wish to consider prior to issuance of the requested permit.

We note that the Kahaluu Fishpond is listed on the National Register of Historic Places. From the description of the project provided, it appears that due to the construction which has already been performed (without benefit of a permit) as well as the proposed new construction, that much of the historic character of the fishpond may essentially be destroyed. Because of its listing on the National register it seems appropriate that a very careful study of the rationale for permitting such extensive and irreversible modification of this structure be made prior to granting the permit.

From the economic and design viewpoint, the magnitude of the bulkheads already constructed and being proposed seem excessive for the stated mullet aquaculture requirements. The economic return on mullet production would not appear sufficient to justify the capital expense of so massive a pond modification. Are any other uses being considered for the pond such as eventual marina development?

We would be interested in your analysis of these questions. Perhaps the requirement of a more extensive assessment or EIS should be considered to assure adequate public review of the impact of this project.

Yours very truly,

Jacquelin N. Miller
of Coakley

cc: Jacquelin Miller
Hank Banner
Steve Smith

Doak C. Cox

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