



ENVIRONMENTAL CONSEQUENCES







Chinese banyan tree, Honouliuli. Photo: NPS, 2011.



## CHAPTER 7: ENVIRONMENTAL CONSEQUENCES

*Analysis of the environmental impacts associated with the study alternatives.*

### Introduction

NPS policy requires that a special resource study be accompanied by an environment compliance document that is prepared in accordance with the requirements of the National Environmental Policy Act (NEPA), its implementing regulations (36 CFR 1500-1508), and Director's Order #12, *Conservation Planning, Environmental Impact Analysis, and Decision-Making* (2011).

Since a special resource study presents management alternatives at a broad level, an accompanying environmental assessment is also performed at a broad or general level. If the site is designated for ownership and management by the NPS, more detailed planning and analysis through a management planning process would result.

The National Environmental Policy Act requires that environmental documents disclose the environmental impacts of the proposed federal action, reasonable alternatives to that action, and any adverse environmental effects that cannot be avoided should the proposed action be implemented. This section analyzes the environmental impacts of project alternatives on affected resources. This analysis provides the basis for comparing the effects of the alternatives. NEPA requires consideration of context, intensity and duration of impacts, indirect impacts, cumulative impacts, and measures to mitigate impacts. Impact analysis for historic properties is based on National Historic Preservation Act (36 CFR Part 800) criteria of effect as detailed below.

The first part of the chapter discusses the methodology used to identify impacts and includes definitions of terms. The impact topics are then analyzed with reference to each of the alternatives. The discussion of each impact topic includes a description of the beneficial and adverse effects of the alternatives, a discussion of cumulative effects, if any, and a conclusion.

### IMPACT TYPE

The impact type classifies the effects as beneficial or adverse and direct or indirect.

**Beneficial:** A change that improves the condition or appearance of the resource or a change that moves the resource toward a desired condition.

**Adverse:** A change that would deplete or detract from the condition or appearance of the resource or a change that moves the resource away from a desired condition.

**Direct:** An effect that is caused by an action and occurs in the same time and place.

**Indirect:** An effect that is caused by an action but is later in time or farther removed in distance, but is still reasonably foreseeable.

### CONTEXT

The context describes the area or location in which the impact will occur.

**Site Specific:** Impacts would occur at the location of the action.

**Localized:** Impacts are limited in extent and would occur in the vicinity of the site being discussed.

**Regional or Widespread:** Impacts would occur across an area or habitat, such as affecting the resource within a watershed or park unit (beyond the boundary of the site being discussed). Widespread impacts are often detectable on a landscape or regional scale.

### DURATION

Describes the length of time an effect will occur, either short-term or long-term:

**Short-term** impacts generally last only during construction, and the resources resume their pre-construction conditions following construction. Short-term impacts are often quickly reversible and associated with a specific event and may last from one to five years.

**Long-term** impacts last beyond the construction period, and the resources may not resume their pre-construction conditions for a longer period of time following construction. Long-term impacts may be reversible over a much longer period, or may occur continuously based on normal activity, or for more than five years.

## INTENSITY

Intensity describes the degree, level, or strength of an impact. For this analysis, intensity has been categorized into negligible, minor, moderate, and major. Beneficial impacts are described but are not assigned intensity levels.

**Negligible:** Measurable or anticipated degree of change would not be detectable or would be only slightly detectable and localized.

**Minor:** Impacts would be slightly detectable or localized within a small portion of the project area.

**Moderate:** Impacts would be measurable or an anticipated degree of change is readily apparent and appreciable. They may be localized or widespread and would be noticed by most people.

**Major:** Impacts would be substantial, highly noticeable, and widespread. Changes to the character of the landscape would occur.

## REDUCING THE LEVEL OF IMPACTS

To reduce their occurrence or intensity, impacts may be avoided, minimized, or mitigated. Managers may:

**Avoid** conducting management activities in an area of the affected resource,

**Minimize** the type, duration, or intensity of the impact to an affected resource, or

**Mitigate** the impact by:

- Repairing localized damage to the affected resource immediately after an adverse impact.
- Rehabilitating an affected resource with a combination of additional management activities.

- Compensating a major long-term adverse direct impact through additional strategies designed to improve an affected resource to the degree practicable.

## CUMULATIVE IMPACT SCENARIO

The Council on Environmental Quality (CEQ) regulations, which implement the National Environmental Policy Act of 1969 (42 USC 4321 et seq.), require assessment of cumulative impacts in the decision-making process for federal projects.

The CEQ describes a cumulative impact as follows (Regulation 1508.7):

A “cumulative impact” is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The cumulative projects addressed in this analysis include past and present actions, as well as any planning or development activity currently being implemented or planned for implementation in the reasonably foreseeable future. Cumulative actions are evaluated in conjunction with the impacts of an alternative to determine if they have any additive effects on a particular resource. Because most of the cumulative projects are in the early planning stages, the evaluation of cumulative impacts was based on a general description of the project. Ongoing or reasonably foreseeable future projects were identified for the surrounding area.

The geographic scope for the cumulative impacts analysis is Honouliuli Gulch and adjacent areas. It is difficult to determine cumulative impacts for the associated sites given the range of locations and property owners.

## **Projects Included in the Cumulative Effects Analysis for this Environmental Assessment**

### **UNIVERSITY OF HAWAII—WEST O‘AHU (UHWO)**

The University of Hawai‘i recently developed a regional plan for a new campus in West O‘ahu south of the H-1 Freeway and south of the Monsanto property and Honouliuli site. Construction of the new university has been underway for two years and will likely continue into the next decade. The University also owns the parcel adjacent to Honouliuli known as the UHWO Mauka parcel and has indicated that master planning for the Mauka parcel will be initiated in the near future. There will be opportunities for the NPS and UHWO to work together in developing plans for adjoining properties.

### **HONOLULU RAIL TRANSIT PROJECT**

The Honolulu Rail Transit Project is a 20-mile elevated rail line that will connect west O‘ahu with downtown Honolulu and, ultimately, the University of Hawai‘i’s Manoa Campus. The Honolulu Authority for Rapid Transportation and the U.S. Federal Transit Administration have completed major planning phases of the project, with some construction already initiated in the UHWO area. The rail system, once completed, has the potential for transporting visitors from the primary visitor lodging areas in Waikiki to the UHWO area, enhancing access to Honouliuli Gulch.

### **MONSANTO COMPANY HAWAII AGRICULTURAL RESEARCH FACILITY**

The Monsanto Company operates seed research, development, and manufacturing on several hundred acres of land immediately adjacent to Honouliuli Gulch. The Monsanto Company owns the Honouliuli Gulch property but does not utilize the area for agricultural purposes. As an agricultural research facility, Monsanto utilizes both field and laboratory areas for agricultural purposes. These activities include discing and planting fields, installing irrigation systems, and developing erosion control modifications to their field system.

## **ASSUMPTIONS**

Given the broad nature of this study, the impact analysis must also be broad, by necessity, and avoid speculation as to site-specific impacts. The findings of this study will inform a recommendation by the Secretary of the Interior to Congress. If a national park unit is designated, then new environmental analysis would be undertaken prior to specific implementation actions. This planning would propose specific actions, and alternatives to them, whose site or area specific impacts would be assessed prior to plan implementation.

Current economic conditions limit the near-term potential for increased local, state, and federal funding for conservation and historic preservation.

The majority of the analyses in this document addresses the Honouliuli Gulch area in more detail than the other associated sites because Honouliuli Gulch is the area under alternative B (preferred) that would be managed by the National Park Service.

The other associated sites would continue to be managed by existing ownership entities, regardless of which alternative is selected. Under alternative B, the NPS could, with a willing landowner, provide community outreach and technical assistance for the preservation and interpretation of these other locales. A cooperative partnership between the NPS and the private landowners is neither required nor assumed, and the manner in which alternative B’s actions could affect these sites is undetermined.

## **Impact Topics**

Specific impact topics were developed to address potential physical, natural, cultural, recreational, and social impacts that might result from the proposed alternatives as identified by the public, NPS, and other agencies and to address federal laws, regulations and executive orders, and NPS policy. Impact topics are the resources of concern that may be affected by the range of alternatives considered in this EA.

An Environmental Screening Form was used to identify initial resources of concern. Environmental Screening Forms were mandated by NPS DO-12: *Conservation Planning, Environmental Impact Analysis and Decision-making*. Comments received from the public during scoping were also considered in the screening process. A brief rationale for the selection or dismissal of each impact topic is provided in Table 7-1 and Table 7-2.

## IMPACT TOPICS ANALYZED

Potential impact topics are reviewed here as to their applicability in this analysis. The rationale for this review stems from the essential purpose of an environmental assessment: to determine whether there would be significant impacts requiring the preparation of an environmental impact statement in order to proceed with the action. The dismissal of topics, with rationale, demonstrates there is no concern in those areas.

Table 7-1: Impact Topics Analyzed	
<i>Impact Topic Retained</i>	<i>Discussion and Rationale</i>
Land Use	<i>Management Policies</i> (NPS 2006) states: "...the Service will cooperate with federal agencies; tribal, state, and local governments; nonprofit organizations; and property owners to provide appropriate protection measures. Cooperation with these entities will also be pursued, and other available land protection tools will be employed when threats to resources originate outside boundaries." Because the alternatives may affect land use, including ownership, occupancy and activities, land use has been retained as an impact topic.
Water Resources (Water Quality and Hydrology)	<i>Management Policies</i> (NPS 2006) provides direction for the preservation, use, and quality of water in national parks. Minor construction projects have the potential to contaminate ground and/or surface water and may have impacts to streams, including water quality. Potential effects to hydrology could also occur from the construction of structures, such as culverts or bridges; therefore this topic has been retained. The Honolulu Board of Water Supply maintains wells and pumping/storage facilities in and immediately adjacent to the Honouliuli Gulch site. Potential effects to hydrology could occur from the construction of structures, such as culverts or bridges. Therefore this topic has been retained.
Prime and Unique Farmlands (Agricultural Lands of Importance to the State of Hawai'i [ALISH])	<p>The Farmland Protection Policy Act of 1981, as amended, requires federal agencies to consider adverse effects to prime and unique farmlands that would result in the conversion of these lands to non-agricultural uses. Prime or unique farmland is classified by the USDA, Natural Resources Conservation Service and is defined as soil that particularly produces general crops such as common foods, forage, fiber, and oil seed; unique farmland produces specialty crops such as fruits, vegetables, and nuts. Prime farmland is one of several kinds of important farmland defined by the USDA. It is of major importance in meeting the nation's short- and long-range needs for food and fiber. Because the supply of high-quality farmland is limited, the USDA recognizes that responsible levels of government, as well as individuals, should encourage and facilitate the wise use of our nation's prime farmland.</p> <p>ALISH (Agricultural Lands of Importance to the State of Hawai'i) is a Hawai'i state classification system that identifies agriculturally important lands and is intended to provide decision makers with a tool for use in agricultural preservation, planning and development. Based on planning maps available through the state of Hawai'i Office of Planning website, the area immediately adjacent Honouliuli Gulch is considered Prime and Unique Farmlands.</p> <p>The potential for an introduction of visitors to an area surrounded by ALISH lands may present an impact to agricultural operations, therefore this topic has been retained.</p>

**Table 7-1: Impact Topics Analyzed**

<i>Impact Topic Retained</i>	<i>Discussion and Rationale</i>
Vegetation	NEPA calls for examination of the impacts on the components of affected ecosystems. <i>Management Policies</i> (NPS 2006) calls for protecting the natural abundance and diversity of park native species and communities, including avoiding, minimizing or mitigating potential impacts from proposed projects. Potential effects to native vegetation, including the introduction of non-native species, could occur from the construction of roads and/or structures, such as culverts or bridges. Therefore this topic has been retained.
Prehistoric and Historic Archeology	Compliance with ARPA in protecting known or undiscovered archeological resources is necessary. <i>Management Policies</i> (NPS 2006) calls for ongoing inventory and analysis of the significance of archeological resources. In addition to the NHPA and <i>Management Policies</i> , NPS DO 28B Archaeology affirms a long-term commitment to the appropriate investigation, documentation, preservation, interpretation, and protection of archeological resources within units of the national park system. As one of the principal stewards of America's heritage, the NPS is charged with the preservation of the commemorative, educational, scientific, and traditional cultural values of archeological resources for the benefit and enjoyment of present and future generations.
Historic Structures/ Cultural Landscapes	<p>Consideration of the impacts to cultural resources is required under provisions of Section 106 of the NHPA as amended, and the 2008 <i>Programmatic Agreement among the National Park Service, the National Conference of State Historic Preservation Officers, and the Advisory Council on Historic Preservation</i> (ACHP). It is also required under <i>NPS Management Policies 2006</i>.</p> <p>Federal land management agencies are required to consider the effects proposed actions have on properties listed in, or eligible for inclusion in, the National Register of Historic Places (i.e., Historic Properties), and allow the ACHP a reasonable opportunity to comment. The National Register is the nation's inventory of historic places and the national repository of documentation on property types and their significance. Agencies are required to consult with federal, state, local, and tribal governments/organizations, identify historic properties, assess adverse effects to historic properties, and negate, minimize, or mitigate adverse effects to historic properties while engaged in any federal or federally-assisted undertaking (36 CFR Part 800).</p> <p>Historic properties may be objects, structures, buildings, or cultural landscapes. Cultural landscapes are settings humans have created in the natural world. They reveal the ties between the people and the land. These ties are based on the need to grow food, build settlements, recreate, and find suitable land to bury their dead. They range from prehistoric settlements to cattle ranches, from cemeteries to pilgrimage routes and are the expressions of human manipulation and adaptation of the land.</p>
Museum Collections	<i>Management Policies</i> (NPS 2006) and other cultural resources laws identify the need to evaluate effects on NPS collections if applicable. Requirements for proper management of museum objects are defined in 36 CFR 79.



**Table 7-1: Impact Topics Analyzed**

<i>Impact Topic Retained</i>	<i>Discussion and Rationale</i>
Visitor Experience	According to <i>Management Policies</i> (NPS 2006), the enjoyment of park resources and values by people is part of the fundamental purpose of all park units. The NPS is committed to providing appropriate, high-quality opportunities for visitors to enjoy the parks, and will maintain within the parks an atmosphere that is open, inviting, and accessible to every segment of society. The parks provide opportunities for forms of enjoyment that are uniquely suited and appropriate to the superlative natural and cultural resources found in the parks. <i>Management Policies</i> (NPS 2006) also states that scenic views and visual resources are considered highly valued associated characteristics that the NPS should strive to protect. Among the impacts that may be considered in this section are visitor access, opportunities and experience, soundscape, and scenic resources as well as interpretation and education. Therefore this topic has been retained for analysis.
Socioeconomics	Socioeconomic impact analysis is required, as appropriate, under NEPA and <i>Management Policies</i> (NPS 2006) pertaining to host or gateway communities. The local and regional economy and some business of the communities surrounding the sites may be based on tourism and resource use. Manufacturing, professional services, and education also contribute to regional economies. Because the alternatives, if implemented, could affect local or regional economies, including minority and low-income populations, this impact topic has been retained for additional analysis. Included in socioeconomics is a brief analysis of impacts on minority and low-income populations.



Looking north into Honouliuli Gulch from the proposed administrative access road. Photo: NPS, 2013.



## IMPACT TOPICS DISMISSED FROM FURTHER ANALYSIS

The topics listed below (Table 7-2) either would not be affected by the alternatives evaluated in this EA, or there would be negligible to minor effects on them. Therefore, these topics have been dismissed from further

analysis. Negligible/minor effects are localized effects that would not be detectable over existing conditions or would not have lasting consequences. There would be no apparent change in the resource.

Table 7-2: Impact Topics Dismissed	
<i>Impact Topic Dismissed</i>	<i>Discussion and Rationale</i>
Federally Listed Species	The Endangered Species Act (ESA) requires an examination of impacts to all federally listed threatened or endangered species. <i>Management Policies</i> (NPS 2006) calls for an analysis of impacts to state-listed threatened or endangered species and federal candidate species. Under the ESA, the NPS is mandated to promote the conservation of all federal threatened and endangered species and their critical habitats within the parks. <i>Management Policies</i> includes the additional stipulation to conserve and manage species proposed for listing. There are no threatened or endangered species in the area; therefore, this topic has been eliminated from analysis.
Wildlife	NEPA calls for examination of the impacts on the components of affected ecosystems, including terrestrial and aquatic wildlife and fish. NPS policy is to protect the natural abundance and diversity of park native species and communities, including avoiding, minimizing, or mitigating potential impacts from proposed projects. Although potential future actions could have a minor effect on wildlife from disturbance associated with rehabilitation, construction, or visitor use, these site specific impacts are currently unknown and would undergo future environmental analysis. Therefore this topic has been dismissed from further analysis.
Air Quality	Under the Clean Air Act (CAA) (42 USC 7401 <i>et seq.</i> ), no air quality designation is associated with the Honouliuli site. If national park unit designation occurred it is likely that the areas would fall under the Class II designation. Class II areas allow only moderate increases in certain air pollutants, while Class I areas (primarily large national parks and wilderness areas) are afforded the highest degree of protection. While negligible to minor effects could occur if a site was designated, these impacts would be undetectable because of the location of the site in suburban areas currently affected by vehicular, agricultural and other air quality impacts.
Geological / Paleontological Resources	<i>Management Policies</i> (NPS 2006) calls for analysis of geology and geological hazards should they be relevant. Geological resources, including paleontological resources (fossils; both organic and mineralized remains in body or trace form) will be protected, preserved, and managed for public education, interpretation, and scientific research (NPS 2006). Because there are no major geological resources associated with the site, this topic has been dismissed from further analysis.

**Table 7-2: Impact Topics Dismissed**

<i>Impact Topic Dismissed</i>	<i>Discussion and Rationale</i>
Floodplains	<p>Floodplains are areas of low-lying land that are subject to inundation by the lateral overflow of waters from rivers or lakes with which they are associated. EO 11988 (Floodplain Management) requires an examination of impacts to floodplains, including the potential risk involved in placing facilities within floodplains. It states that federal agencies must:</p> <p><i>...take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains...</i></p> <p>Accordingly, agencies must determine whether a proposed action is located in or would impact the 100-year floodplain. The 100-year floodplain is designated by the Federal Emergency Management Agency (FEMA) as those low-lying areas that are subject to inundation by a 100-year flood (i.e., a flood that has a one percent chance of being equaled or exceeded in any given year). Because, according to initial investigations, no areas of existing development at the sites are within the 100-year floodplain, this topic has been dismissed from further environmental analysis.</p> <p>The Honouliuli Gulch lies in a “D Zone” which corresponds to unstudied areas where flood hazards are undetermined but are possible. Given that the predominant morphological land feature is, essentially, a drainage coming off of the Waianae Range, it is very likely that intermittent flooding occurs, even to the point of threatening structures and other features. Specific proposed placement of facilities in the floodplain are not within the scope of this study, therefore this topic is dismissed from further analysis.</p>
Wetlands	<p>EO 11990 <i>Protection of Wetlands</i> requires federal agencies to avoid, where possible, adversely impacting wetlands. In addition, §404 of the CWA authorizes the ACOE to prohibit or regulate, through a permitting process, discharge or dredged or fill material or excavation within waters of the United States.</p> <p>The ACOE identifies three criteria for the identification of wetlands including hydrophytic vegetation, hydric soil, and positive indicators of wetland hydrology (ACOE 1987). The ACOE and EPA jointly define wetlands (under their administration of the CWA) as:</p> <p><i>Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs and similar areas (33 CFR 3 § 328.3, 2004).</i></p> <p>DO 77-1: <i>Wetland Protection</i> requires that the NPS use the <i>Classification of Wetlands and Deepwater Habitats of the United States</i> (Cowardin et al. 1979) as the standard for defining, classifying, and inventorying wetlands. This system generally requires that a positive indicator of wetlands be present for only one of the indicators (vegetation, soils, or hydrology) rather than for all three parameters as mandated by ACOE and EPA. As with the ACOE, NPS policies for wetlands protection require a <i>Statement of Findings</i> for proposed actions that have the potential to adversely affect 0.10 acre or more of wetlands. As stated in <i>Management Policies</i> (NPS 2006) and <i>DO 77-1 Wetlands Protection</i>, strive to prevent the loss or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands. Because, according to initial investigations, no areas of existing development at the sites contain wetlands, this topic has been dismissed from additional environmental analysis.</p>



**Table 7-2: Impact Topics Dismissed**

<i>Impact Topic Dismissed</i>	<i>Discussion and Rationale</i>
Ethnography / Traditional Cultural Resources	<p>Analysis of impacts to known ethnographic resources is important under the NHPA and other laws. The NPS defines ethnographic resources as any “site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it” (DO-28, <i>Cultural Resource Management Guideline</i>:181).</p> <p>Traditional Cultural Properties or other sites are associated with the cultural practices and beliefs of a living community that are rooted in that community’s history and are important in maintaining the continuing cultural identity of the community. No traditional cultural properties or ethnographic resources associated with the sites have been identified to date. Therefore this topic has been dismissed from additional environmental analysis. If, at a later date, ethnographic resource concerns were identified from ongoing consultation with individuals and groups associated with the internment sites in Hawai’i and Native Hawaiians, these would be investigated further to avoid impacts.</p>
Soundscape	In accordance with <i>Management Policies</i> (NPS 2006) and DO 47 <i>Sound Preservation and Noise Management</i> , an important component of the NPS mission is the preservation of natural soundscapes associated with national park units. No impacts to soundscapes have been identified from the alternatives; therefore this impact topic has been dismissed from further environmental analysis.
Wilderness	NPS wilderness management policies are based on provisions of the 1916 NPS Organic Act, the 1964 Wilderness Act, and legislation establishing individual units of the national park system. These policies establish consistent service-wide direction for the preservation, management, and use of wilderness and prohibit the construction of roads, buildings, and other man-made improvements and the use of mechanized transportation in wilderness. All management activities proposed within wilderness are subject to review following the minimum requirement concept and decision guidelines. The public purpose of wilderness in national parks includes the preservation of wilderness character and wilderness resources in an unimpaired condition, as well as for the purposes of recreational, scenic, scientific, education, conservation, and historical use. Because there is no wilderness in or associated with the proposed site, there would be no impacts to wilderness. Therefore this topic has been dismissed from additional environmental analysis.
Human Health and Safety / Hazardous Materials	<i>Management Policies</i> (NPS 2006) states that the NPS and its concessioners, contractors, and cooperators will seek to provide a safe and healthful environment for visitors and employees. Inherent risks associated with visiting or working in this site relate to its tropical location, its dry environment, vegetation, and relative isolation. Surrounding agricultural uses and nearby water pumping facilities present an undetermined level of risk. If an NPS unit were later established, NPS standard safety policies and guidelines would be employed and would be used to minimize risk. Because no specific risks associated with the proposed alternatives that have been identified, this topic has been dismissed from additional environmental analysis.
Energy Consumption	Except as associated with travel to the site, implementation of the proposed actions would not cause substantial increases or decreases in the overall consumption of electricity, propane, wood, fuel oil, gas, or diesel. As a result, energy consumption has been dismissed from additional analysis.

**Table 7-2: Impact Topics Dismissed**

<i>Impact Topic Dismissed</i>	<i>Discussion and Rationale</i>
Lightscapes	In accordance with <i>Management Policies</i> (NPS 2006), the NPS strives to preserve natural ambient lightscapes, which are natural resources and values that exist in the absence of human-caused light. No impacts on natural lightscapes have been identified as a result of the actions proposed in the alternatives. Therefore, lightscapes, or night sky, will not be addressed further as an impact topic.
Wild and Scenic Rivers	Under the Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), "...certain selected rivers of the Nation, which with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations." There are no wild and scenic rivers in or proposed within any of the sites; therefore this impact topic has been dismissed from further analysis.
Environmental Justice	EO 12898 requires all federal agencies to incorporate environmental justice into their missions by identifying and addressing disproportionately high and adverse human health or environmental effects of their programs and policies on minorities and low-income populations and communities. The actions evaluated in this EA would not adversely affect socially or economically disadvantaged populations. There would be no disproportionately high and adverse human health or environmental effects on minorities or low-income populations or communities. Potential beneficial effects to these communities, however, are discussed within the Socioeconomics section. Proposed actions would not exclude or separate minority or low-income populations from the broader community or disrupt community cohesiveness and economic vitality. Therefore, environmental justice has been dismissed from additional analysis.
Indian Trust Resources	Indian trust assets are owned by Native Americans but held in trust by the United States. Secretarial Order 3175 ("Identification, Conservation and Protection of Indian Trust Assets") requires that any anticipated impacts to Indian trust resources due to a proposed project or action by agencies within the Department of the Interior be explicitly addressed in environmental documents. The federal Indian trust responsibility is a legally enforceable fiduciary obligation on the part of the United States to protect tribal lands, assets, resources, and treaty rights, and it represents a duty to carry out the mandates of federal law with respect to American Indian and Alaska Native tribes. The sites does not hold or contain areas that are held in trust by the Secretary of the Interior for the benefit of Indians due to their status as Indians, therefore this topic was dismissed from detailed analysis.
Public Health and Safety	Implementation of some of the proposed actions could potentially benefit public health. The alternatives would preserve open space which would contribute to improved health and recreational opportunities. The benefits to public health and safety would be undetermined, however, and therefore have been dismissed from further analysis.



**Table 7-2: Impact Topics Dismissed**

<i>Impact Topic Dismissed</i>	<i>Discussion and Rationale</i>
Climate Change and Sustainability	The long-term effects of global climate change are uncertain; however it is clear that the Earth is experiencing a warming trend that affects ocean currents, sea levels, polar sea ice, and global weather patterns. Although these changes may affect precipitation patterns and amounts in Hawai‘i, it would be speculative to predict localized changes in temperature, precipitation, or other weather changes, in part because there are many variables that are not fully understood and there may be variables not currently defined. Analysis of the degree to which effects may occur over the timeframe of this plan would be speculative and would not change actions associated with the alternatives. Therefore the effects of future climate change or speculation about changes that would occur are not discussed further.
Soils	<i>Management Policies</i> (NPS 2006) require that the NPS understand and preserve, and prevent, to the extent possible, the unnatural erosion, physical removal, or contamination of the soil. Although potential future actions could have a minor effect on soils from disturbance associated with rehabilitation or construction, these site specific impacts are currently unknown and would undergo future environmental analysis. Therefore this topic has been dismissed from further analysis.

## Land Use

Honouliuli Gulch is in the Kunia area of central O‘ahu, approximately 15 miles west of Honolulu, north of the H-1 Freeway and west of Kunia Road. Current and potential infrastructure (access roads being investigated for inclusion in the potential park unit) are located on three additional parcels to the southwest of the property owned by the University of Hawai‘i (See Map, Chapter 5: Ownership and Land Use–Honouliuli Internment Camp) and are agricultural land either actively farmed or fallow. The current land owners purchased the property from the James Campbell Company in 2007. Because of the steep topography along the edges of the Honouliuli Gulch, it was not used for sugar cane or pineapple cultivation. However, starting in 1958, portions of uncultivated land in the gulch were leased for a cattle ranching operation.

The aggregate parcels owned by the Monsanto Company constitute Monsanto’s “Kunia Farm” and are mostly dedicated to growing seed corn and other crops. Some areas are currently fallow while other areas are covered by thick vegetation (grasses, mostly guinea grass). Only a small portion of the subject property (7-acre parcel) is outside of the gulch and in cultivation. At present, the Honouliuli Gulch is mostly overgrown with grasses and brush. Vegetation

is routinely cut around some remnant historical features of the former internment camp. Several years ago, the Japanese Cultural Center of Hawai‘i (JCCH) started offering guided tours of the former internment camp, and has been cutting vegetation to provide access for the tours.

Other uses of the area include three small parcels owned by the City and County of Honolulu Board of Water Supply (BWS) that house municipal water supply wells (Honouliuli II-1, II-2, and II-3), a concrete control building, and a water treatment plant within the fenced area at the Honouliuli II-1 well site. These parcels are currently fenced and maintained by BWS. There is a recently paved access road entering the gulch from the east side of the subject property. Large satellite dishes owned by the KITV television station have been installed on the slope of the gulch, near the access road, in the southern part of the gulch. The remnant structures within the gulch associated with the former internment camp consist primarily of building foundations, rock walls, and fence remnants.

Parcels owned by the Monsanto Company surround Honouliuli Gulch to the northwest, north, and east, while parcels owned by the University of Hawai‘i bound it to the south and southwest. These agricultural lands are

either actively cultivated or fallow. The nearest residential development to the subject property is located east of Kunia Road at a distance of approximately 1 mile, and south of highway H-1 at a distance of approximately 1 mile.

Within the extent of Monsanto Parcel 1, east of the subject property, there are three additional parcels owned by BWS, and one small parcel owned by Hawaiian Electric. BWS operates two municipal water supply wells (Honouliuli I-1 and I-2) on its parcels, located just east of the access gate to the gulch access road, where Hawaiian Electric operates a substation. BWS wells were completed between 1986 and 1989. BWS also operates two water reservoirs near the southernmost corner of the subject property, near the H-1 Freeway (Honouliuli 228). Both BWS and Hawaiian Electric hold easements on Monsanto Parcel 1 to allow access to their properties.

Agricultural (i.e., ‘cane haul’) roads exist throughout the area and, in some cases, terminable rights of access are associated with certain parcels.

## IMPACTS OF ALTERNATIVE A

There would be no changes in land ownership, occupancy, or use as a result of implementation of this alternative. Sites, organizations, and programs significant to the internment in Hawai‘i would continue to operate independently. Honouliuli Gulch is not managed to provide visitor opportunities—although intermittent controlled access by interested agencies and organizations would continue to be expected.

To the immediate west of the Honouliuli Gulch is a large (over 900 acres) parcel owned by the University of Hawai‘i—West O‘ahu (referred to as the Mauka property). The University of Hawai‘i has designated approximately 294 acres within the Mauka property (the area nearest to the H-1 Freeway) for future campus expansion or University-related development (including scientific and research activities), as required under the land transfer agreement with the Estate of James Campbell. A land use plan and campus plan have not yet been completed for the Mauka property and, once completed, will guide the development of this property. The University of Hawai‘i has issued agriculture permits for grazing and cultivation

on the Mauka parcel. The 294 acres could be developed and characteristics that identify it with the Japanese American internment history could be modified or lost. This could result in moderate to major adverse impacts.

Except for other sites in Hawai‘i already listed on local or national historic registers (for example Kilauea Military Camp in Hawai‘i Volcanoes National Park and the U.S. Immigration Station in Honolulu), there may be no coordination related to preservation of the internment of Japanese Americans and European Americans. Over time, there could be systematic loss of this and related sites, where not already protected by private or municipal preservation organizations, and a long-term indirect minor to moderate adverse effect could occur because there would be no effort made to link these sites as part of a group, potentially leading to less collective desire for protection. Pending continued protection of sites designated or eligible as NHLs or listed in the National Register of Historic Places NRHP, effects would remain moderate.

## IMPACTS OF ALTERNATIVE B (PREFERRED ALTERNATIVE)

Designation of Honouliuli Internment Camp as a national historic site would be coordinated with national, regional and local organizations. The site would be owned and managed by the National Park Service. Possible changes to zoning could occur through city and county of Honolulu (and adjacent landowner) land use plans to reflect the historic preservation of Honouliuli Gulch and visitor uses. Similarly, land use or management plans for the remaining sites within the network of internment locations in Hawai‘i may be modified to preserve, protect and/or recognize the historic significance of these areas.

Long-term beneficial effects and additional localized preservation initiatives could result from recognizing the Honouliuli Gulch site as part of a network of broader Hawaiian sites related to World War II and internment history. Recognition would result in long-term beneficial effects on protection of the Honouliuli Gulch site, and potentially the other locales. NPS technical assistance and applicable historic preservation grants could be used to preserve these other internment sites where current



owners/managers do not have the resources to showcase its significance, resulting in long-term beneficial effects on land use from historic preservation efforts and new opportunities to provide visitors with a better understanding of the importance of the site. There could be better protection of the Honouliuli Internment Camp cultural landscape and increased use by visitors.

Coordination with the University of Hawai‘i provides the opportunity to share and provide physical, educational, and interpretive resources. Depending on the extent of future anticipated visitor use, there could be changes to the UHWO regional plan to enhance aspects of the University of Hawai‘i—West O‘ahu campus and agricultural fields adjacent to Honouliuli Gulch for visitors if Honouliuli Gulch were to be designated a unit of the national park system.

## MEASURES TO AVOID, MINIMIZE OR MITIGATE IMPACTS

Development of visitor-related (and some administrative) infrastructure would be limited within the boundary of the Honouliuli Internment Camp National Register property due to infrastructure capacity and environmental constraints. Likely support for visitor facilities would be in the vicinity of the University of Hawai‘i—West O‘ahu campus to take advantage of existing development plans and more easily manage access methods (i.e., shuttle buses). The 7-acre parcel adjacent to the Honouliuli Gulch area is an agricultural field under recent cultivation. This site could be an appropriate location for limited visitor transition facilities (i.e. limited parking, interpretive wayside exhibits, shade structures, vault toilets) that require no new utilities.

Initial plans for access into the Honouliuli Gulch area would require rights of access from UHWO and coordination with neighboring agricultural operations.

## CUMULATIVE EFFECTS

Under alternatives A and B, there could be cumulative impacts on land use resulting from the campus development on the University of Hawai‘i—West O‘ahu lands to the west of Honouliuli Gulch and construction of the Honolulu rail line. Impacts would largely be associated with developing agricultural lands,

which was the historic setting for Honouliuli Internment Camp. However, this development could also support increased visitation to the Honouliuli site which would result in greater public understanding about the internment history.

Alternative B would have increasing levels of beneficial cumulative effects on land use for agricultural purposes. For example, re-zoning of the surrounding agricultural lands for activities other than agriculture may have a negative impact on the preservation of cultural resource values (i.e., diminished viewsheds). Alternative B would support continued use of the agricultural zoning as a method to promote open space and a more ‘historic’ land use pattern that sets the context for Honouliuli Gulch. Honouliuli Gulch, by virtue of its location in an ‘out of sight’ drainage surrounded by agricultural lands, became a remote and inaccessible place—precisely fitting the perceived need to keep internees away from the rest of the O‘ahu Japanese American population (and vice versa).

## CONCLUSION

Alternative A would have no direct effects on land use, but lack of a specific preservation direction for Honouliuli Gulch could result in incremental changes to use of the agricultural lands surrounding the gulch, resulting in long-term moderate to major adverse impacts to the Honouliuli Gulch Internment Camp.

Alternative B would have long-term beneficial effects from linking the site and resultant preservation initiatives to the National Park Service. With a reliance on ‘offsite’ visitor contact infrastructure (in the vicinity of the University of Hawai‘i—West O‘ahu), and utilization of existing roads, visitor impacts to existing agricultural operations surrounding Honouliuli Gulch would be limited. Impacts to the University of Hawai‘i—West O‘ahu’s parcels in the immediate vicinity of the Honouliuli Gulch area would need to be reassessed should the university’s planning process identify an activity other than agriculture for these parcels.

## Water Resources

Honouliuli Gulch is a riparian corridor running between Pearl Harbor’s West Loch and the Waianae Range with an ephemeral stream.

The elevation of Honouliuli Gulch ranges from approximately 600 feet above mean sea level at the north to 220 feet above mean sea level at the south. The gulch is about 500 to 700 feet wide with steep slopes; the depth of the gulch floor below the gently sloping adjacent land is approximately 70 to 100 ft. There are no permanent streams within the subject property or adjacent parcels. However, following heavy precipitation on the Waianae mountain range and the Kunia area, surface water drains through the gulch, forming the ephemeral Honouliuli Stream. At the northern end of the gulch, the U.S. Geological Survey (USGS) maintains a stream flow gage (station number 16212480 Honouliuli Stream Tributary). To the north of the gulch, Reservoir #155 receives water from Waiahole Ditch, the primary irrigation water source to the area. The Waiahole Ditch originates on the windward side of O'ahu and terminates just north of the subject property, on Monsanto's parcel 9-2-001-001. Historically, water from the Waiahole Ditch was transported through the subject property by way of an aqueduct and siphon (pipeline) system. Topography of the land surrounding the gulch is gently sloping towards the south-southeast towards Pearl Harbor's West Loch area. Elevation and water features are identified on the Map: Water Resources.

The Hawai'i State Department of Health has required recordation of a Declaration of Restrictive Covenants (Domestic Waste Water Treatment and Disposal) in connection with the Monsanto Company's actions to subdivide the property.

## **IMPACTS OF ALTERNATIVE A**

There would be no known changes to water resources as a result of implementation of this alternative. Because no changes would occur in management of the existing site, there would be no new impacts to water resources.

## **IMPACTS OF ALTERNATIVE B**

Although modifications could be made to accommodate visitor parking and walking trails through the gulch, the known water resources located at this site (i.e. ground water pumping station used to support existing Bureau of Water Supply operations, the ephemeral stream, the USGS Water Gage) would not be adversely impacted.

If Honouliuli Internment Camp was to be designated a National Park Service site, there would eventually be minor impacts to water resources if modifications to the drainage were made. Among the modifications that could be considered would be small bridges (similar to the six small bridges used during the confinement period) or box culvert to avoid impacting the stream crossing from repeated vehicle crossings of the creek during ephemeral flows. At other times of the year, this area is a dry wash.

A vegetation management plan would be expected to be developed, potentially impacting the use of groundwater by large woody plants in the gulch. The reduction of this vegetation may result in more regular flows and longer periods of groundwater presence in the stream.

Long-term beneficial effects on hydrology and water quality could occur over time by improved attention to the existing (and potential) infrastructure and relative geomorphological impacts to the ephemeral stream. Construction would have short-term minor adverse impacts from the potential for sedimentation from excavation around the stream channel for placement of infrastructure improvements.

## **MEASURES TO AVOID, MINIMIZE OR MITIGATE IMPACTS**

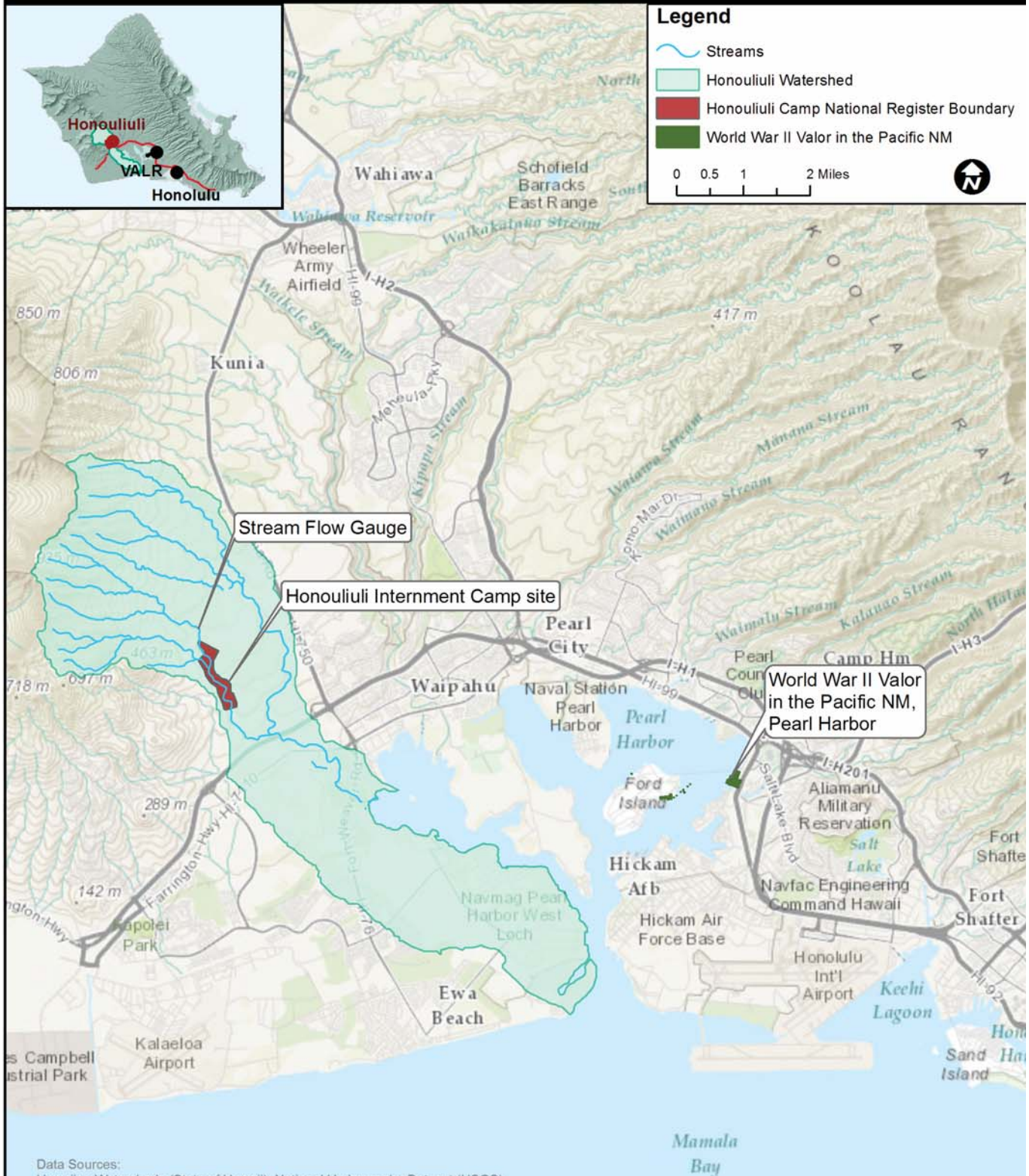
Measures that would be included to minimize impacts to water resources include the utilization of best management practices associated with near stream activities (i.e., barriers to prevent sedimentation of streams, erosion prevention measures, etc.). Limited data from the USGS water gage shows that water flow in the ephemeral stream occurs in the form of flash floods with fast draw down periods. There do not appear to be regular 'seasons' of high/low flow in the stream, although it is expected that the wet season period will likely result in the more consistent flows (i.e., November through April).

The National Park Service would ensure that wastewater facilities improvements would not impact groundwater resources presently utilized by the Board of Water Supply. There are no water waste systems currently in place in the gulch. If the site were designated a unit of the national park system, to the extent possible,



# Honouliuli Gulch and Associated Sites Draft Special Resource Study

## Water Resources



Data Sources:  
 Hawaiian Watersheds (State of Hawaii), National Hydrography Dataset (USGS),  
 Honouliuli Internment Camp (NPS), World War II Valor in the Pacific National Monument (NPS)

The NPS makes no warranty, express or implied, related to the accuracy or content of this map.

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such facilities would be located outside of Honouliuli Gulch in the vicinity of the overlook parcel and would be consistent with the Department of Health covenant associated with the property.

## CUMULATIVE EFFECTS

Because Honouliuli Internment Camp is located in an agricultural area it is likely that these actions will contribute negligible to minor adverse effects during runoff to area water quality. Because there would be no direct actions associated with alternative A, there would be no contribution to cumulative impacts. Alternative B likely contributes negligible to moderate localized adverse impacts as a result of increased visitation over alternative A because of the stream crossing, if deemed necessary for access into the gulch.

## CONCLUSION

Alternative A would have no direct effects and ongoing minor adverse effects on water resources. Alternative B would have initial, primarily short-term, negligible to moderate adverse effects followed by long-term beneficial effects on water resources.-

## Biological Resources

### VEGETATION (INCLUDING NONNATIVE SPECIES)

The entire site was cleared for the construction of the internment and POW camp in 1943. Prior to use as an internment site, the gulch supported ranching activities and irrigation infrastructure development. Existing vegetation represents over half a century's growth of mostly introduced vegetation.

Much of the Honouliuli Gulch area is overgrown with vegetation, most notably invasive species such as Guinea grass (*Panicum maximum*) and haole koa (*Leucaena* sp.), with Chinese banyan trees (*Ficus microcarpa*) near the creek drainage that runs north to south through roughly the center of the gulch. Other species observed at the site include sandalwood (*Santalum ellipticum*), monkeypod (*Samanea* sp.), sisal (*Agave sisalana*), mock orange (*Murraya paniculata*), allamanda (*Allamanda cathartica*), wild bitter melon (*Momordica charantia*), and kukui (*Aleurites moluccana*).

After discussion with the U.S. Fish and Wildlife Service, a determination was made that there were no listed species present in the vicinity of the Honouliuli Gulch, so the NPS decided to dismiss T&E species from further consideration.

### Impacts of Alternative A

Where bare ground exists there would continue to be the potential for colonization by nonnative invasive plants, a long-term minor impact that could range to moderate associated with the agricultural operations in the area.

### Impacts of Alternative B

Management of the cultural landscapes associated with the Honouliuli Internment Camp would undoubtedly require a vegetation management plan promoting reduction of canopy and brush. Historic period photographs of the gulch show an area with limited to no overhead vegetation and very low lying ground cover (grasses). It is unknown at this point what impact a vegetation management program would have on native flora and fauna habitat, however, through a continued presence by the National Park Service, greater attention to, and awareness of, the vegetation and wildlife resources in Honouliuli would exist.

A vegetation management plan may result in moderate adverse effects on native vegetation if that plan emphasized brush and canopy reduction and if there were strong assemblages of native vegetation reliant on brush and canopy plants. Similarly, because the site ecosystem is located in an area that has been largely modified by the presence of roads, buildings, structures, utilities, and other facilities associated with agricultural activity and water resource use, very little native wildlife habitat exists.

Alternative B anticipates visitor access and would therefore require infrastructure support outside of the gulch, and some level of vegetation management inside the gulch. Impacts to native and nonnative flora and fauna would also be limited and would primarily have minor to moderate short-term adverse impacts from disturbance. Long-term minor adverse impacts, such as from removal of nonnative vegetation, could also occur as landscape plans



are implemented and native plants impacted. The extent of the native plant community in the gulch is not clearly understood at this time.

Although native vegetation could be used in future landscaping efforts, it is likely that the site would continue to be comprised primarily—though at a significantly lower level—of nonnative landscaping that is true to its historic period of significance. This would include eliminating large nonnative trees and shrubs as senescence or die-off occurred or through active removal.

### Measures to Avoid, Minimize, or Mitigate Impacts

With a proposed active NPS management role in alternative B, Honouliuli Gulch would be monitored for protected species and noxious species. These two categories of flora and fauna would be managed in keeping with the guidance identified in *NPS Management Policies 2006* and under laws and policies regulating federal management of these resources.

### Cumulative Effects

Alternative A would have no new effects and no new contributions to cumulative effects. Ongoing cumulative effects would continue to be present from existing development. Overall cumulative effects would remain moderate to major from previous alteration of vegetation and wildlife habitat and presence at these sites.

Alternative B would have minor to moderate cumulative adverse effects from vegetation management activities needed to preserve the historic landscape features (irrigation ditches, concrete slabs, pier footings, etc.), as well as historic viewsheds documented in period photographs. The likely removal of extensive portions of the (primarily nonnative) vegetation will impact the existing flora and fauna habitats found in Honouliuli Gulch. A vegetation management plan (as a component of a cultural landscape report) would need to be developed under alternative B and would require further environmental compliance review and include a more in-depth survey of biological resources and potential impacts.



Summer archeological field school, Honouliuli. Photo: Jeffery Burton.

## Conclusion

Alternative A would have negligible to minor short-term adverse effects on native vegetation and wildlife. Alternative B would likely have minor to moderate, primarily short-term adverse impacts on existing biological resources, with further refinement of this conclusion through steps such as developing a cultural landscape report, conducting vegetation surveys, and/or preparing a vegetation management plan.

## Cultural Resources

This section includes the assessment of effects to prehistoric and historic archeology, historic structures, cultural landscapes, and museum collections.

The Honouliuli Internment Camp is listed in the National Register of Historic Places and is nationally significant under criteria A

—the property is associated with events that have made a significant contribution to the broad patterns of our history, and criteria D —the property has yielded, or is likely to yield information important in prehistory or history.

Other sites that were found to be nationally significant and retain a high degree of integrity include the U.S. Immigration Station, currently listed in the National Register of Historic Places and Kilauea Military Camp, eligible to be listed in the National Register of Historic Places

For detailed descriptions of the cultural resources see Chapters 2 and 3.

Assessment of effects to cultural resources includes the use of determinations as defined in Section 106 of the National Historic Preservation Act. Table 7-3 is a crosswalk of the NEPA effects with the Section 106 effects.

Table 7-3: Crosswalk for NEPA and Section 106 Effects		
NEPA	Section 106	Description
Negligible to Minor	No Effect	A determination of no historic properties affected means that either there are no historic properties present or there are historic properties present in the area of potential effects (APE) but the undertaking will have no effect upon them (36 CFR 800.4(d)(1)).
Minor to Moderate	No Adverse Effect	A determination of no adverse effect means there is an effect, but the effect would not meet the criteria of an adverse effect [36 CFR Part 800.5(a) (1)], i.e. diminish the characteristics of the cultural resource that qualify it for inclusion in the National Register (36 CFR 800.5(b)). In addition, the undertaking may start out as an adverse impact but may be mitigated in design, or is modified, reduced, and/or avoided such that it no longer would produce an adverse effect on historic resources. This category of effects may have effects that are considered beneficial under NEPA, such as restoration, stabilization, rehabilitation, and preservation projects.
Major	Adverse Effect	An adverse effect occurs whenever an impact alters, directly or indirectly, any characteristic of a cultural resource that qualifies it for inclusion in the National Register, e.g. diminishing the integrity (or the extent to which a resource retains its historic appearance) of its location, design, setting, materials, workmanship, feeling, or association. Adverse effects also include reasonably foreseeable effects caused by the alternatives that would occur later in time, be farther removed in distance or be cumulative (36 CFR 800.5(a) (1)). An adverse effect may be resolved in accordance with the 2008 Programmatic Agreement, or by developing a memorandum or program agreement in consultation with the SHPO, ACHP, American Indian tribes, other consulting parties, and the public to avoid, minimize, or mitigate the adverse effects (36 CFR Part 800.6(a)).

## ARCHEOLOGY

This section refers to both prehistoric and historic archeological resources. Much of the archeological resources that remain and have been studied at Honouliuli are historic. More research is needed to better understand the extent of the prehistoric resources within the Honouliuli Gulch.

Development related to Honouliuli Internment Camp occurred prior to the advent of or just as cultural and archeological resources protection laws and guidelines were instituted. As a result, it is both unknown and unlikely that archeological resources were surveyed for during development of the internment camp. Systematic archeological surveys and research at the Honouliuli Internment Camp were initiated in 2006. This effort is being coordinated by UHWO and JCCH. Archeological resources at Honouliuli are described in detail in Chapters 2 and 3.

### Impacts of Alternative A

Under alternative A, there would be no anticipated new actions that would affect prehistoric or historic archeological resources. Although no new actions would occur, use of the site by current landowners could have the potential for ground disturbance and consequent impacts to archeological resources, particularly where some remnant native vegetation and soils exist. Therefore, although no new actions are proposed, current landowners could continue to modify areas under their control and could affect known and previously undiscovered archeological resources. Depending on the significance of these and the extent of disturbance, this could be a negligible to major adverse effect. Additionally, lack of preservation management of the archeological resources could result in erosion or natural disturbances. Archeological resources could also continue to receive some beneficial effects from zoning, historic preservation, and landowner stewardship. Under Section 106, alternative A would have no effect to adverse effect.

### Impacts of Alternative B

Under alternative B, impacts to known and undiscovered archeological resources would be negligible to minor given that the intent of

managing the site as a national park unit would be to preserve the cultural resources present. Development of some areas within the site to accommodate visitors, including placement of navigational and interpretive signs could have minor adverse effects from disturbance of archeological resources. Federal preservation laws would require the assessment of any areas proposed for disturbance and subsequent planning efforts to avoid or minimize impacts to cultural resources. Overall effects would likely be minor and under Section 106 would have no effect or no adverse effect on archeological resources. Beneficial effects could also occur from additional survey, research, and documentation of new archeological sites. In addition, enhanced NPS involvement at Honouliuli could result in additional staffing and funding to protect archeological resources, a long-term beneficial effect.

### Measures to Avoid, Minimize or Mitigate Impacts

Measures to minimize impacts to prehistoric and historic archeological resources would include:

- Location of primary visitor and operational facilities outside of the historic camp boundary.
- Survey of project areas by a professional archeologist for prehistoric and historic cultural remains.

Immediate work stoppage and/or relocation to a non-sensitive area would occur should unknown archeological resources be uncovered during ground disturbing projects at the site. The site would be secured and consultation with the Hawai'i State Historic Preservation Officer would occur to determine appropriate actions to be taken.

### Cumulative Effects

Archeological resources within the Honouliuli Internment Camp may have been previously disturbed to varying degrees from past disturbances including pre-World War II agricultural practices, the development of the internment camp, erosion, and other natural processes. Because mitigation measures would be employed to minimize impacts to potentially unidentified cultural resources in other proposed and future projects, it is



likely that these would protect archeological resources from additional impacts. There would be no construction-related contributions to cumulative impacts from new actions proposed under alternative A; ongoing impacts from landowner actions, however, could continue to occur. It is unknown whether there would be contributions to cumulative impacts on resources from proposed actions that would be implemented by others as identified in the vicinity of the sites. It is likely that under alternative B, if archeological remains were inadvertently discovered during construction, these alternatives could contribute additional negligible to minor adverse impacts which would be mitigated by additional investigation of the find immediately upon discovery or relocation of the work to a non-sensitive area.

## **Conclusion**

Under alternative A, if the site continued to be undeveloped, there would be a minor long-term adverse effect to archeological resources from erosion and natural processes. If the landowner implemented development in the site without proper precautions to protect archeological resources, there would be a minor to major long-term adverse effect to the resources. Under Section 106, impacts could range from no effect to an adverse effect. Alternative B would include a plan for managing and preserving archeological resources, therefore it would have no effect or no adverse effect.

## **HISTORIC STRUCTURES / CULTURAL LANDSCAPES**

Honouliuli Internment Camp contains over 130 features related to the incarceration of American civilians, resident aliens, and prisoners of war during World War II. Contributing resources in the archeological site include two standing buildings, numerous building foundations, rock walls, fence remnants, artifact scatters, and other features.

At least four of the associated sites no longer have extant structures that date to the events that occurred during their association with internment at Honouliuli. None of the associated sites are presently being managed for their relationship with internment.

## **Impacts of Alternative A**

Under alternative A, some of the structures at the Honouliuli Internment Camp would continue to receive some protection from landowner stewardship. Others would continue to be neglected. Over time, buildings and structures would likely be demolished or disappear through benign neglect. Depending on the significance of these structures and the extent of disturbance, this could be a minor to major adverse effect. Historic structures could also continue to receive some beneficial effects from zoning, historic preservation, and landowner stewardship. Under Section 106, alternative A would have no effect to adverse effect.

For other sites associated with internment during World War II, alternative A would continue existing management approaches taken by the variety of landowners of such sites. While there may be recognition of the historic significance of these areas, there would not necessarily be an overarching approach taken to preserve either the cultural landscape integrity (such as it may exist in some locations) or to preserve the historic structures. With the exception of sites under federal or state ownership, protection of historic structures and landscapes would be voluntary and dependent on the owners' initiative.

## **Impacts of Alternative B**

### **HONOULIULI**

NPS management of Honouliuli Internment Camp would ensure that preservation laws and policies would be followed to protect the historic structures at the site. Any remaining historic structures would be stabilized and preserved to tell the story of Honouliuli. Likely a cultural landscape inventory or cultural landscape report would be conducted to identify Honouliuli's cultural landscape characteristics and would provide preservation and treatment recommendations. These would all be beneficial to the historic structures. There is a minor chance that some NPS management efforts needed to improve the site or provide for visitor and staff health and safety would result in impacts to the historic resources. Under Section 106, alternative B would have no effect and no adverse effect on historic structures.

## OTHER SITES

Alternative B would allow the National Park Service the opportunity to provide technical assistance to the other associated sites for preservation guidance and assistance with nominating sites to the National Register of Historic Places, if warranted. However, with limited recognition for many of the other related sites, there would likely continue to be a wide range of effects on these sites, ranging from beneficial effects where they were designated on the NRHP (such as Kilauea Military Camp) or by other municipalities (such as in Lihue and Wailuku, Maui) and protected to no effect, no adverse effect and adverse effects, depending on the disposition of the properties and the interest and initiative of landowners in maintaining the characteristics which make the sites potentially eligible for the NRHP.

## Cumulative Effects

Historic structures and landscape features within the Honouliuli Internment Camp may have been previously disturbed to varying degrees from past activity including pre- and post-World War II agricultural practices, the development of the internment camp, erosion, and other natural processes. Because mitigation measures would be employed to minimize impacts to known and unidentified cultural resources in other proposed and future projects, it is likely that these would protect the historic structures from additional impacts. There would be no construction-related contributions to cumulative impacts from new actions proposed under alternative A; ongoing impacts from landowner actions however could continue to occur. It is unknown whether there would be contributions to cumulative impacts on resources from proposed actions that would be implemented by others as identified in the vicinity of the sites. Under alternative A, the cumulative impacts would be no effect and no adverse effect. Under alternative B, the National Park Service would protect and preserve any significant historic structures and landscape features. These preservation efforts would be beneficial and result in no effects to historic properties.

## Conclusion

Under Alternative A, no specific actions would be taken to ensure the stabilization or preservation of historic structures at Honouliuli Internment Camp. There would be no systematic effort to inventory or rehabilitate cultural landscapes. Other sites eligible for the NRHP could be maintained or modified and there could be a variety of effects, ranging from no effect to no adverse effect to adverse effect. The preservation and management of these sites would continue to be dependent on the initiative of their private landowners.

It is likely that the U.S. Immigration Station and Kilauea Military Camp would continue to be preserved, a long-term beneficial effect. It is not clear whether other associated sites (Maui County Jail and Courthouse, Lihue Courthouse, Honolulu Downtown Jail) would continue to be preserved. Under Alternative B, Honouliuli Internment Camp would receive some level of appropriate funding for resource protection and preservation. Associated internment sites and groups could also be eligible to receive grants to promote stewardship, preservation, and education programs related to the internment story.

## MUSEUM COLLECTIONS

The current museum collections for Honouliuli Internment Camp include artifacts associated with recent archeological excavations by Burton and Farrell with the University of Hawai'i—West O'ahu, oral history collections at the University of Hawai'i, the Japanese Cultural Center of Hawai'i, and other entities focused on Japanese internment and archival materials related to the design, construction, and operation of the camp. Other materials include the agricultural records for Campbell and Del Monte.

## Impacts of Alternative A

There would be no changes to museum collections as a result of implementation of alternative A. Standards of care would vary among organizations and individuals holding objects. The lack of systematic museum collection management could result in minor to moderate adverse effects to museum collections.

## **Impacts of Alternative B**

In alternatives B, the NPS would take on an expanded role for conservation and protection of museum collections because it could, in fact, acquire objects pertinent to its role in providing for visitor services interpretation and education in these alternatives. The NPS could also work in partnership with the JCCH in its role as collection center for archival materials. There is potential for beneficial effects to occur from its ability to lend management and collections expertise (technical assistance) to this and other partner foundations, organizations and individuals. It is also likely that, as overall coordinator of Japanese American internment history in Hawai'i, the NPS could become the recipient of donated objects or broader collections from individuals or organizations. To the extent that these were curated and stored by the NPS in an acceptable depository, there would be long-term beneficial effects on museum collections.

## **Measures to Avoid, Minimize or Mitigate Impacts**

Objects obtained by or donated to the NPS would be curated in an appropriate museum facility. Under alternative B, the NPS would identify or provide technical support for a repository for collections storage. Where requested, the NPS could provide technical support regarding museum collections.

## **Cumulative Effects**

With the exception of efforts made by the JCCH, there has been no systematic collecting or documenting objects associated with the internment of Japanese Americans in Hawai'i. However, a range of documents, oral histories, art, and other objects is available to researchers at the Japanese Cultural Center research center in Honolulu. Alternative B would likely also have negligible to moderate beneficial effects coupled with cumulative beneficial effects on museum collections.

## **Conclusion**

Under alternative A, museum collections would continue to be collected and maintained by a variety of entities in a non-systematic manner. The lack of a uniform and systematic collection plan could result in minor to moderate adverse

impacts to museum collections. Alternative B would result in beneficial effects to the current and newly obtained museum collections.

## **VISITOR USE AND EXPERIENCE**

### **Access and Transportation**

Current access to Honouliuli Gulch is restricted. Any access to the site is by special permission only and requires compliance with Monsanto Company security protocols. Accessing the site involves traveling on the Monsanto property along dirt roads designed and used for agricultural research purposes and secured with locked gates. Access to the associated internment sites located throughout Hawai'i varies depend on the land owner. The U.S. Immigration Station is located on a busy thoroughfare (Ala Moana Boulevard) in Honolulu. Access to the U.S. Immigration Station is controlled through a guarded entry and is available only by appointment with Department of Homeland Security staff.

## **Impacts of Alternative A**

There would be no changes to access and transportation to Honouliuli as a result of implementation of alternative A. Without a national park system unit related to the internment in Hawai'i, it is anticipated that current limited and restricted visitation to the Honouliuli Internment Camp would continue. Existing federal, state, and county programs and policies would remain in place. The JCCH would continue to offer limited visitor activities in other locations, and possible activities at the site with the permission and concurrence of the landowner, such as the Day of Remembrance pilgrimage. Alternative A would have no new effects on access and transportation.

## **Impacts of Alternative B**

Under alternative B, the NPS would plan for access and transportation to Honouliuli Gulch to provide the most effective access to the site. Access to the site could be via a combination of vehicle access roads and footpaths. Following designation, management planning would consider transportation options and would outline access routes to the site in a manner that is both sensitive to the resources and the overall visitor experience. Use of existing roads would be explored to minimize site disturbance. With



an increased tourist awareness of a national park site's presence at Honouliuli, and with the development of visitor amenities, it would be expected that Honouliuli would be viewed as an important location for learning about our nation's Pacific War history as well as an opportunity to interact with O'ahu's natural environment. In addition to daily operations, special events and commemorations (i.e., pilgrimages) would likely be held at the site. Both daily operation needs and special events would be considered in the transportation and access planning. Coordinated planning for transportation and access for Honouliuli Gulch would have long-term beneficial effects to the site.

### **Measures to Avoid, Minimize or Mitigate Impacts**

Measures to minimize impacts to access and transportation would include a reliance on existing rights-of-way and roadways to, and in, the Honouliuli Gulch area. Nearby transit opportunities (located at and near the University of Hawai'i—West O'ahu) could assist with reduced infrastructure development near the gulch. These nearby transit modes include both rail (under development) and bus that will serve the growing university campus and surrounding businesses. A shuttle system to convey visitors up to Honouliuli Gulch could be considered in a management plan under alternative B to manage vehicle and pedestrian circulation.

Implementation of alternative B would include the development of uniform signage in conjunction with local transportation authorities, to direct visitors to the site, if an NPS site was created.

### **Cumulative Effects**

Alternative A would have no new actions and thus there would be no cumulative effects on visitor access and transportation. The potential development of the UHWO property along with the designation of a national park unit would increase the number of people that access the area. However, with the development and implementation of a management plan, the impacts would be reduced to negligible to minor long-term adverse.

### **Conclusion**

Alternative A would have no effect on access and transportation. Current conditions would continue. Because there would be few changes in levels of service at the sites, there would likely be no effect on transportation and no changes in traffic congestion.

Alternative B would have long-term beneficial effects as a result of a transportation plan developed as part of a new national park designation. There would be an increase in visitation to the site, but the transportation management through implementation planning would account for these changes and provide an effective and efficient manner for which visitors would access and navigate the site. The development of a management plan that would identify appropriate locations for improved roadways and footpaths would be beneficial to the site.

### **VISITOR USE OPPORTUNITIES / INTERPRETATION AND EDUCATION**

Current visitor use opportunities including interpretation and education at Honouliuli Internment Camp are restricted to sporadic, limited tours coordinated by the Japanese Cultural Center of Hawai'i. Interpretation and educational opportunities regarding Honouliuli Internment Camp are provided outside of the gulch using a variety of media, but these are virtual experiences as opposed to in-person experiences. For example, World War II Valor in the Pacific National Monument at Pearl Harbor provides an interpretive exhibit on internment during World War II.

Visitor use and interpretation and education opportunities at the associated sites are very limited and vary according to the property owner. Because many visitor use opportunities would be associated with interpretation and education, these topics have been combined below.

### **Impacts of Alternative A**

There would be no changes in visitor use opportunities as a result of implementation of this alternative. Occasional special events could allow for public access to Honouliuli Internment Camp. For instance, guided tours were offered on the Day of Remembrance in 2012, but not in 2013. Public use would

continue to be limited and would be dependent on the initiative of the visitor to take advantage of opportunities to see related sites and on the agreement of the site owner to make it available to the public, resulting in a long-term minor to moderate adverse effect.

Opportunities are also available to learn about Honouliuli through various websites, including the JCCH ([www.Hawaiiinternment.org](http://www.Hawaiiinternment.org)) and websites for sites and resources on the mainland. The JCCH website offers access to teacher lesson plans, photographs and archives, a timeline, and links, while the other websites offer articles, white papers, timelines, photographs, and other written material. Visitation would be expected to remain at current levels, including periodic increases for special events. While no additional visitor services would be provided in alternative A, there would be ongoing visitor use opportunities to experience Honouliuli Internment Camp and information, a long-term beneficial effect.

## Impacts of Alternative B

### HONOULIULI

In addition to a variety of ongoing beneficial effects in alternative A, there would be enhanced opportunities for visitor use in alternative B. Designation of a national historic site would create new opportunities for visitors to experience and understand the history and experience of Japanese American and European American incarceration during World War II. New visitor use opportunities at Honouliuli and Valor in the Pacific National Monument could be provided. At Valor in the Pacific National Monument, the NPS could link the two sites with interpretive programming, identifying major themes and coordinating information and some activities associated with the two sites. Educational programs developed by the NPS and its partners would highlight the role of Japanese Americans during WWII.

Because potential development of a visitor center is uncertain, many of the visitor use opportunities in alternative B would be dependent on WWII Valor in the Pacific



Onsite presentation, 2011 Day of Remembrance Pilgrimage to Honouliuli Internment Camp. Photo: Brian Niiya, Japanese Cultural Center of Hawai'i.

National Monument to develop visitor facilities and internet-based information. Expansion of existing partnerships between the NPS, UHWO, and JCCH could further enhance interpretation and education programs. Coordination of the site by the NPS under alternative B would improve visitor understanding and education of this era in history over the no action alternative. There would also be new information on the internet, including an NPS-based website for pre-visit planning and for those people studying the history of the Japanese American and European American incarceration during World War II. Such a website could offer links to other existing websites, such as the JCCH website, other NPS sites, Densho, and the Japanese American National Museum site.

### **OTHER SITES**

While some locations on neighbor islands would continue to be viewed only from the outside and current unrelated uses would likely continue, it is also possible that over time these sites could become more accessible to the public. Nonetheless, even commemorative and interpretive signs indicating the events that transpired would improve visitor use opportunities and experiences. Increased visitation may result in increased public knowledge and could further encourage protection of resources, resulting in beneficial impacts over time. Combined there would be long-term beneficial effects by providing new and/or expanded visitor use opportunities associated with designating a new national historic park unit.

### **Cumulative Effects**

Current visitor use opportunities are offered on a limited basis by the property owner and the Japanese Cultural Center of Hawai'i. There would be no cumulative effects to visitor use opportunities under alternative A because these would not be coordinated or expanded. Alternative B would contribute an array of beneficial cumulative effects by providing additional visitor use opportunities that highlight the history of Japanese American, European American, and prisoner-of-war incarceration during World War II. The implementation of this alternative would result in cumulative beneficial effects over time, as more Americans would gather a

better understanding of this history and the implications of due process and civil rights. Moreover, information would be available through an NPS website and visitor use opportunities on site would be advertised and potentially coordinated by the NPS.

UHWO development could potentially have short-term impacts on the development of educational and interpretive programs at Honouliuli due to construction traffic, noise, and vibration, and long-term impacts from the noise associated with increased traffic.

The Hawai'i legislature has commissioned a group, called the Honouliuli Park Site Advisory Committee, to support preservation of the Honouliuli site. Recent site planning efforts have been related to an education facility, although no recommendations or decisions have been made by the state of Hawai'i. The potential impacts to visitor use of the sites are unknown at this time.

### **Conclusion**

Alternative A would have no effect on visitor use opportunities and interpretation and education about the history and experience of Japanese American and European American incarceration during World War II. Alternative B would have beneficial effects on visitor use opportunities associated with understanding the history and experience of Japanese American and European American incarceration during World War II. The action alternative would contribute to engendering a better understanding of these events for all Americans as well as for international visitors. Because of the inclusion of NPS involvement, alternative B would provide a centralized national location for information about the history and experience of Japanese American and European American incarceration during World War II that would be available to all in perpetuity.

### **SOCIOECONOMICS**

#### **West O'ahu Socioeconomic Setting**

The west O'ahu area was at one time used primarily for both agricultural production (sugar cane and pineapple) and military infrastructure (Barbers Point, Ewa Field). Located just beyond the more highly developed and populated Pearl Harbor area, and



significantly further from the central ‘core’ of downtown Honolulu, west O‘ahu represents a primarily non-urban setting with increasing development opportunities and pressures. West O‘ahu is where the “second city” of Kapolei is being promoted as an alternative governmental agency center away from the high-density Kakaako district near downtown Honolulu. This community is the closest example of a ‘gateway’ community to the Honouliuli Gulch area, though it is separated by over a mile on the H-1 Freeway.

A recent economic study, (Identification and Quantification of Economic Development Opportunities in West O‘ahu; SMS Consulting; Honolulu, HI, July 2011) prepared for the West O‘ahu Economic Development Association, states that while the west O‘ahu area has seen rapid population increase, this surge will slow to just slightly above the population trend of the City and County of Honolulu. Primary employment sectors are projected to be in the education and health fields, arts and entertainment fields, and construction and transportation sectors. Most businesses in west O‘ahu are small (fewer than ten employees and most annual sales under \$1 million annually). These businesses primarily serve immediate community residents and are mostly headquartered in west O‘ahu.

Historically, settlement in the west O‘ahu area was strongly connected to agricultural plantation operations that relied on a series of ethnic groups as sources of labor. This is one of the reasons why Hawai‘i has such a strong mix of Portuguese, Japanese, Chinese, and Filipino (among other) communities. Many were hired to come to Hawai‘i and perform farm labor, after which a large number elected to stay. With the decline of agricultural production and greater diversification of the state economy, the communities near the Honouliuli Gulch area represent newly arrived residents attracted to the more suburban development plan and more affordable housing. Educational attainment is varied in west O‘ahu with Kapolei (the closest community to Honouliuli Gulch) having highest educational attainment rates for this part of O‘ahu.

The dispersed nature of the associated internment sites located throughout Hawai‘i, and their setting in either remote areas or

settings with other primary uses (i.e., local government settings) makes it difficult to generalize the overall socioeconomic impacts of the two alternatives. The feasibility of promoting greater tourism to these locations—and therefore enhanced economic development opportunities for these areas—is likely limited. More in-depth, site specific feasibility assessments on socioeconomic impacts to associated sites would need to be conducted once these individual sites engage in strategies to promote preservation and site stewardship of internment history in Hawai‘i.

### **Impacts of Alternative A**

There would be no changes to socioeconomic conditions as a result of implementation of this alternative. Under alternative A, services provided at the sites would continue at the same levels. No new direct impacts on the regional economy would occur with this alternative.

### **Impacts of Alternative B**

Designation of a Honouliuli national park unit would likely have beneficial economic and social impacts on the area. Possible socioeconomic impacts could include visitation to the site or sites, surrounding areas, and other attractions; expenditures from park operations and park staff; expenditures by visitors, sales, and hotel tax revenues from visitor expenditures; and growth in visitor-related businesses that support the tourism economy.

Although the western part of O‘ahu has historically had an agricultural-based economy, it includes growing retail, tourism, government, education, and a variety of other employment sectors. Establishing a new national historic site in west O‘ahu would have negligible effects on the state economy. It is likely that tourism numbers for the state of Hawai‘i would not increase solely because of Honouliuli becoming a national historical site. However, additional visitors and NPS staff would contribute to the local economy by purchasing various goods and services, including food, gasoline, and lodging. Overall, beneficial impacts on the local economy would be expected. Interpretive tours for visitors would likely generate local economic benefits in the vicinity of the University of Hawai‘i—West O‘ahu commercial development area—to the extent that commercial development provides goods and services

needed by visitors. Over time there would likely be sustained economic benefits from tourism dollars and jobs supported by them.

### Cumulative Effects

Because there would be no new actions in alternative A, there would be no contribution to cumulative impacts on socioeconomics. Under alternative B, the Honolulu Rail and UHWO campus expansion (including planned commercial development near the existing campus and future university development onto the Mauka parcel) would have a beneficial cumulative impact to the Honouliuli National Historic Site by providing transportation access and an educational portal with partnership opportunities for people visiting the site.

Because there would be no new actions in alternative A, there would be no contribution to cumulative impacts on socioeconomics. Alternative B would contribute increasingly beneficial effects to socioeconomics. Combined with past, present, and future actions, such as the new University of Hawai‘i campus in West O‘ahu, alternative B would have negligible to minor beneficial contributions to cumulative socioeconomic impacts.

### Conclusion

Alternative A would result in no direct or cumulative impacts on socioeconomics. Because it would allow the Hawai‘i internment history to be shared at a national park site, alternative B would have localized beneficial impacts on socioeconomics, including some discernible impacts on local communities, as well as beneficial impacts on the heritage documentation of some minority populations.

### Environmentally Preferable Alternative

In accordance with NPS Director’s Order-12, *Conservation Planning, Environmental Impact Analysis, and Decision-making* and Council on Environmental Quality (CEQ) requirements, the NPS is required to identify the “environmentally preferable alternative” in all environmental documents, including EAs. The environmentally preferable alternative is determined by applying the criteria suggested in the National Environmental Policy Act (NEPA) of 1969, which is guided by the CEQ. The CEQ

(46 FR 18026 - 46 FR 18038) provides direction that the “environmentally preferable alternative is the alternative that would promote the national environmental policy as expressed in NEPA’s Section 101,” including:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life’s amenities; and
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources (NEPA Section 101(b)).

Generally, these criteria mean the environmentally preferable alternative is the alternative that causes the least damage to the biological and physical environment and that best protects, preserves, and enhances historic, cultural, and natural resources (46 FR 18026 – 46 FR 18038).

Alternative B would protect the nationally significant resources, including opportunities for protecting the Honouliuli site in perpetuity should the Monsanto Company donate or sell it to the NPS, meeting criterion 1 above. Alternative B would also best meet the intent embodied in criteria 2, 3, and 4 by providing opportunities for protection of the Honouliuli site with more opportunities for visitors to learn about the history and experience of Japanese American and European American incarceration during World War II. All alternatives would likely meet the principles identified in criteria 5 and 6. Although there are

no specific actions related to these currently in the alternatives associated with these criteria, long-standing NPS policies and actions would apply. Based on this analysis, alternative B best meets the six criteria and is therefore the environmentally preferable alternative.

<b>Table 7-4: Comparison of Impacts</b>		
<i>Resource</i>	<i>Alternative A</i>	<i>Alternative B</i>
Land Use	There would be no direct impacts to land use. Existing land use plans and zoning would continue to guide management of individual areas. Over time, there could be systematic loss of the Honouliuli Internment Camp and sites related to the history and experience of Japanese American and European American incarceration during World War II. A long-term indirect minor to moderate adverse effect would occur because there would be no effort made to link Honouliuli to other NPS sites, potentially resulting in less desire for protection.	There would be long-term beneficial effects from designating Honouliuli Internment Camp as a unit of the national park system. This designation would offer a high level of preservation and management to the Honouliuli Internment Camp. Associated internment sites in other parts of the state could also be linked and therefore more protection initiatives would be offered for them. Some associated internment sites could be modified or lost, a minor to moderate long-term adverse effect.
Water Resources	There would be no direct impacts on water resources from implementation of this alternative.	This alternative would improve existing roadways and would limit development to areas outside of the historic camp boundary, resulting in a benefit to the water resources. Development of a road crossing through the gulch could result in minor temporary construction runoff and overall long-term beneficial impacts from improved protection of water quality.
Vegetation	There would be no new impacts to vegetation. Ongoing minor to moderate adverse impacts to vegetation from invasive species would continue to occur. No known federally threatened or endangered species occur at the Honouliuli Internment Camp.	Changes, such as the placement of roads, trails, parking areas, and signs, could occur to accommodate visitor use. Because these changes would generally occur in highly modified habitats, they would have negligible to minor short-term effects on native vegetation. The development and implementation of a vegetation management plan as a component of a historic landscape plan would direct changes to vegetation density and composition in the Honouliuli Gulch.
Prehistoric and Historic Archeological Resources	If the site continued to be undeveloped, there would be a minor long-term adverse effect to archeological resources from erosion and natural processes. If the landowner implemented development in the site without proper precautions to protect archeological resources, there would be a minor to major long-term adverse effect to the resources. Under Section 106, impacts could be no effect, no adverse effect, or adverse effect.	Placement of visitor facilities such as trails, parking, and signs would not be expected to affect archeological resources if located outside of the historic boundary and/or in areas that have already been disturbed. There would be long-term beneficial effects where state or federal archeological resources protection laws were invoked and/or from further survey or testing research.  There would be no effect or no adverse effect on archeological resources.



**Table 7-4: Comparison of Impacts**

<i>Resource</i>	<i>Alternative A</i>	<i>Alternative B</i>
Historic Structures/ Cultural Landscapes	No specific actions would be taken to ensure the protection of the NRHP-listed Honouliuli Internment Camp. This would result in no adverse or adverse effects.	Overall impacts to historic and cultural resources at Honouliuli would range from no effect to no adverse effect to adverse effect. With establishment of an NPS management unit, it is likely that actions to accommodate visitors would have no effect or no adverse effect. This could also extend to related sites in other areas, pending willingness of landowners to manage sites in accordance with historic preservation guidelines. However the NPS would retain only a technical assistance, coordinating, or advisory role. Where management actions to protect sites, buildings and structures occurred, there would be long-term beneficial effects. Where they did not, minor to moderate adverse effects could occur.
Museum Collections	There would be no new impacts. Alternative A would not add appreciably to protection of museum collections, although some objects and materials could continue to be protected through UHWO, JCCH, and others. Some objects may also be lost due to lack of protection options.	Alternative B would have the potential to add to museum collections and to provide for a systematic collection plan and would result in beneficial effects to the current and newly obtained museum collections.
Visitor Use and Experience: Access and Transportation	There would be no changes to access and transportation. Current conditions would continue.	Alternative B would include the development of a Honouliuli Gulch management plan that would identify desired visitor experiences and identify the most effective access and transportation options to the site. A management plan would outline access routes to the site in a manner that is sensitive to the resources as well as a way to enhance the visitor experience. Both daily operation needs and special events would be considered in the transportation and access planning. A well-developed transportation and access plan for Honouliuli Gulch would have long-term beneficial effects to the site.
Visitor Use and Experience: Visitor Use Opportunities/ Interpretation and Education	There would be no effect on visitor use opportunities and interpretation and education.	Alternative B would have beneficial effects on visitor use opportunities associated with understanding the history of the Japanese American internment during WWII. Because of the National Park Service presence, alternative B would provide a centralized national location for information about the history of the Japanese American internment during WWII in Hawai'i that would be available to all in perpetuity.

**Table 7-4: Comparison of Impacts**

<i>Resource</i>	<i>Alternative A</i>	<i>Alternative B</i>
Socioeconomic impacts, including minority and low-income populations	There would be no direct or cumulative impacts on socioeconomics.	Alternative B would have localized beneficial impacts on socioeconomics, including some discernible impacts on local communities, as well as beneficial impacts on the heritage documentation of some minority populations from sharing this story at a national park site. Commercial services available in the still developing University of Hawai'i—West O'ahu area may benefit from increased heritage-related tourism.









Honouliuli Day of Remembrance and first annual Pilgrimage. Photo: NPS, 2010.



## CHAPTER 8: CONSULTATION AND COORDINATION

### Public Involvement

Congress directed the National Park Service to complete a special resource study of sites that are significant to the incarceration of Japanese Americans and European Americans during World War II, and to determine whether one or more of these sites are eligible and suitable to be managed as a unit of the national park system. The study team provided opportunities for elected officials, local governments, organizations, and residents in Hawai‘i to learn about and contribute to the study process through public meetings, stakeholder meetings, a newsletter, and the study website.

As directed in the legislation, the NPS consulted with the state and local historical associations and societies, including state historic preservation offices, Native Hawaiian and local government entities, and other interested parties.

### SCOPING

The NPS study team launched public scoping for this study in February 2011. The NPS produced and distributed newsletters to the media, individuals, organizations, and government officials. The purpose of the newsletter was to introduce the study, explain the process to community members, and solicit comments on issues the study should address. The newsletter also contained information on the schedule of public scoping meetings.

The newsletter was published and made available for comment on the National Park Service’s Planning, Environment and Public Comment (PEPC) website. The comment period extended to June 1, 2011, 30 days after publication of the notice of scoping in the *Federal Register*. Comments received after the closing date were also accepted.

Press releases announcing the beginning of the study process and the public meeting schedule were distributed to local media. Numerous articles and opinion pieces about the study have appeared in area newspapers. All information sent by mail or e-mail was also available on the special resource study website at [www.nps.gov/pwro/honouliuli](http://www.nps.gov/pwro/honouliuli).

In February and March 2011, the study team held a series of public scoping meetings on the six main islands in Hawai‘i (Table 8-1). The meetings were attended by more than 100 people. The presentation included an overview of the study purpose and process, identification of the sites associated with

the internment, and potential management ideas and outcomes. After the presentation, the NPS staff facilitated group discussions to capture public comments related to the study.

In addition to comments received at the public scoping meetings, the NPS received comments via written letters and through e-mail.

Local, state, and federal government officials and associated organizations and individuals were contacted. Numerous telephone conversations were held when face-to-face meetings were not possible. The NPS met with the following entities during scoping:

Japanese Cultural Center of Hawai‘i

University of Hawai‘i—West O‘ahu

University of Hawai‘i—Mānoa

Historic Hawai‘i Foundation

Hawai‘i Judiciary History Center

Hawai‘i Department of Land and Natural Resources



Honouliuli Day of Remembrance, 2011. Photos: NPS.

**Table 8-1: Public Scoping Workshops, 2011**

<i>Location</i>	<i>Date</i>	<i>Attendance</i>
Waipahu, HI Honouliuli Day of Remembrance	February 27, 2011	18
Kailua-Kona, HI	March 1, 2011	6
Hilo, HI	March 10, 2011	10
Kaunakakai, Molokai, HI	March 17, 2011	6
Lānai City, HI	March 22, 2011	3
Kahului, Maui, HI	March 24, 2011	12
Lihue, Kauaʻi, HI	March 29, 2011	26
Honolulu, HI	March 31, 2011	23
<b>TOTAL</b>		<b>104</b>

## SUMMARY OF PUBLIC SCOPING COMMENTS

Public comments were universal in the desire to commemorate the internment experience in Hawaiʻi. People felt that internment and incarceration during World War II is an important part of Hawaiian history and noted the differences between the experiences of Japanese Americans on the mainland. Most stated that there are important lessons to be learned from this history.

### Management

When asked if the NPS should be involved in managing the internment sites, most respondents expressed strong support for NPS management and involvement at the sites, particularly at Honouliuli Gulch. This support was structured around the perception that preservation of the sites and interpretation about this part of history aligns more closely with the mission of the National Park Service than with that of any other organization. The public also stated that the NPS is the entity most able to manage the sites, rather than other entities who could contribute as partners, but not also as land managers.

### Partnerships

Commenters expressed strong support for partnerships, especially for education, research, and collecting oral histories. The partners that were mentioned with greatest frequency were the Japanese Cultural Center of Hawaiʻi, the University of Hawaiʻi, the local government, veterans' associations or veterans' centers on the islands, and businesses.

### Honouliuli Gulch Preservation

Public comments related to Honouliuli Gulch supported the designation of the site as a unit of the national park system. The public also supported the NPS acceptance of the donation of Honouliuli Gulch from the Monsanto Company.

There were numerous comments about how best to share the story and what types of experiences visitors could have at Honouliuli Gulch. Suggestions for interpretation included: 1) a visitors center with oral histories, videos, educational displays, and programs; 2) reconstruction of representative structures including barbed wire, guard towers, a tent or barracks, and mess hall; and 3) external educational and research resources including websites, links to other educational institutions, and confinement sites.

Many people thought Honouliuli Gulch would be the best location for the NPS's preservation and interpretive efforts related to the internment in Hawaiʻi. There was support for preservation and interpretation at the other sites as well, recognizing that these efforts could be accomplished in partnership with the NPS.

Some people thought that Honouliuli Gulch could be linked to World War II Valor in the Pacific National Monument on Oʻahu. Such a connection could tie this part of Hawaiian history to the larger World War II story and help bring attention and visitation to the site because of the name recognition and association with World War II Valor in the Pacific National Monument.

### Other Sites

At public meetings throughout Hawaiʻi, people generally focused their comments on their local sites. Thus, there was strong support for recognizing the sites on the neighbor islands. At a minimum, participants said that each site could (and should) be marked with a plaque or other commemorative marker. Technical assistance could be provided by the NPS for preservation and interpretive programs.

There was also strong support expressed for providing wider access to Kilauea Military Camp for all visitors, and for onsite interpretation and a guided or self-guided walking tour.



## Interpretation

Many public comments focused on interpretation and history of the sites. Suggestions included interpretation on martial law and civil rights in Hawai‘i, redress and reconciliation after the war, the lives of the Japanese Americans in the camp and within the local communities, and the relationship of this part of history to current affairs. There was also interest in the history of the prisoners of war at Honouliuli and Kilauea Military Camp.

## Agency Consultation

### SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT

The State of Hawai‘i Department of Lands and Natural Resources Historic Preservation Division was notified by JCCH in 2011 about the Honouliuli Gulch special resource study. They provided a letter to the NPS dated May 4, 2011 indicating that the area of potential effect would be the gulch itself and access roads to the gulch. They stated that the “acquisition of the property will have no adverse effect on historic property.” To comply with NPS responsibilities for Section 106, at the time of release of this draft study, the NPS will consult with the State Historic Preservation Division to seek concurrence on 1) recognition of the special resource study undertaking, 2) the area of potential effect, 3) identification of historic properties within the Honouliuli Gulch area, 4) finding of effect to historic properties.

### SECTION 7 OF THE ENDANGERED SPECIES ACT

The study team initiated consultation under Section 7 with the Pacific Island field office of the U.S. Fish and Wildlife Service in June 2011 with regard to an updated list of any threatened and endangered species associated with the study sites. The U.S. Fish and Wildlife Service found that the study would have “no effect” on federally listed species. Further evaluation would be warranted if major construction projects were proposed as a result of study outcomes and implementation. The U.S. Fish and Wildlife Service is invited to comment on the draft study.

## List of Draft Study Recipients

The draft study, executive summary newsletter, or announcement that the study is available online was sent to contacts on the study mailing list. The draft study and an executive summary newsletter are available at [www.nps.gov/pwro/honouliuli](http://www.nps.gov/pwro/honouliuli).

The draft study was sent to the following agencies and organizations:

## FEDERAL AGENCIES AND ELECTED OFFICIALS

Advisory Council on Historic Preservation

Congressional Representatives

Senator Brian Schatz

Senator Mazie Hirono

Congresswoman Tulsi Gabbard

Congresswoman Colleen Hanabusa

U.S. Department of Homeland Security

U.S. Department of Interior

National Park Service

Ala Kahakai National Historic Trail

Haleakalā National Park

Hawai‘i Volcanoes National Park

Kaloko-Honokōhau National Historical Park

Kalaupapa National Historical Park

Manzanar National Historic Site

Minidoka National Historic Site

National Park of American Samoa

Pu‘uhonua O Hōnaunau National Historic Site

Pu‘ukoholā Heiau National Historic Site

Tule Lake Unit

War in the Pacific National Historical Park

World War II Valor in the Pacific National Monument

Office of Native Hawaiian Relations

U.S. Fish and Wildlife Service

## STATE AND LOCAL AGENCIES AND ELECTED OFFICIALS

City and County of Honolulu Planning

Governor Neil Abercrombie

Honolulu County

Honouliuli Park Site Advisory Committee

Senator Mike Gabbard

Senator Will Espero

Representative Richard Lee Fale

Department of Business, Economic Development, and Tourism

Department of Lands and Natural Resources

State Historic Preservation Division

State Parks Division

Department of Hawaiian Homelands

## BUSINESSES, INSTITUTIONS, AND ORGANIZATIONS

‘Ahahui Siwila Hawai‘i o Kapolei  
Bishop Museum  
Hawai‘i Historical Society  
Historic Hawai‘i Foundation  
Japanese American Citizens League  
Japanese American National Museum  
Japanese Cultural Center of Hawai‘i  
Kapolei Community Development Corporation  
Monsanto Company  
National Parks Conservation Association  
National Parks Foundation  
National Trust for Historic Preservation  
Office of Hawaiian Affairs  
Pacific Historic Parks  
Society of Hawaiian Archaeology  
University of Hawai‘i–Mānoa  
University of Hawai‘i–West O‘ahu  
Select public libraries in the Hawaiian Islands









Fragment of surviving barbed wire, Honouliuli Internment Camp, 2010. Photo: Valentino Valdez.



# APPENDICES

## Appendix A: Study Legislation

On Oct. 30, 2009, P.L. 111-88, Division A, Department of the Interior, Environment, and Related Agencies Appropriations Act, was signed into law. Title I, Section 125, “Honouliuli Special Resource Study,” authorizes the Secretary of the Interior to complete a special resource study of the Honouliuli Gulch and associated sites. The following is the text of the legislation that pertains to the Honouliuli Special Resource Study.

### DEPARTMENT OF THE INTERIOR, ENVIRONMENT, AND RELATED AGENCIES APPROPRIATIONS ACT, 2010 PUBLIC LAW 111-88—OCT. 30, 2009

111th Congress

#### An Act

Making appropriations for the Department of the Interior, environment, and related agencies for the fiscal year ending September 30, 2010, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress...

#### SEC. 125. Honouliuli Special Resource Study.

(a) IN GENERAL.—The Secretary of the Interior (referred to in this section as the “Secretary”) shall conduct a special resource study of the national significance, suitability, and feasibility of including the Honouliuli Gulch and associated sites within the State of Hawaii in the National Park System.

(b) GUIDELINES.—In conducting the study, the Secretary shall use the criteria for the study of areas for potential inclusion in the National Park System described in section 8 of Public Law 91-383 (16 U.S.C. 1a-5).

(c) CONSULTATION.—In conducting the study, the Secretary shall consult with—

1. the State of Hawaii;
2. appropriate Federal agencies;
3. Native Hawaiian and local government entities;
4. private and nonprofit organizations;
5. private land owners; and
6. other interested parties.;

(d) THEMES.—The study shall evaluate the Honouliuli Gulch, associated sites located on O‘ahu, and other islands located in the State of Hawaii with respect to—

1. the significance of the site as a component of World War II;
2. the significance of the site as the site related to the forcible internment of Japanese Americans, European Americans, and other individuals; and
3. historic resources at the site.

(e) REPORT.—Not later than 2 years after the date of enactment of this Act, the Secretary shall submit to the Committee on National Resources of the House of Representatives and the Committee on Energy and Natural Resources of the Senate a report describing the findings, conclusions, and recommendations of the study required under this section.

Approved Oct. 30, 2009

## **Appendix B: 2006 NPS Management Policies (Sections 1.2 and 1.3)**

### **1.2 THE NATIONAL PARK SYSTEM**

The number and diversity of parks within the national park system grew as a result of a government reorganization in 1933, another following World War II, and yet another during the 1960s. Today there are nearly 400 units in the national park system. These units are variously designated as national parks, monuments, preserves, lakeshores, seashores, wild and scenic rivers, trails, historic sites, military parks, battlefields, historical parks, recreation areas, memorials, and parkways. Regardless of the many names and official designations of the park units that make up the national park system, all represent some nationally significant aspect of our natural or cultural heritage. They are the physical remnants of our past—great scenic and natural places that continue to evolve, repositories of outstanding recreational opportunities, classrooms of our heritage, and the legacy we leave to future generations—and they warrant the highest standard of protection.

It should be noted that, in accordance with provisions of the Wild and Scenic Rivers Act, any component of the National Wild and Scenic Rivers System that is administered by the Park Service is automatically a part of the national park system. Although there is no analogous provision in the National Trails System Act, several national trails managed by the Service have been included in the national park system. These national rivers and trails that are part of the national park system are subject to the policies contained herein, as well as to any other requirements specified in the Wild and Scenic Rivers Act or the National Trails System Act.

### **1.3 CRITERIA FOR INCLUSION**

Congress declared in the National Park System General Authorities Act of 1970 that areas comprising the national park system are cumulative expressions of a single national heritage. Potential additions to the national park system should therefore contribute in their own special way to a system that fully represents the broad spectrum of natural and cultural resources that characterize our nation.

The National Park Service is responsible for conducting professional studies of potential additions to the national park system when specifically authorized by an act of Congress, and for making recommendations to the Secretary of the Interior, the President, and Congress. Several laws outline criteria for units of the national park system and for additions to the National Wild and Scenic Rivers System and the National Trails System.

To receive a favorable recommendation from the Service, a proposed addition to the national park system must (1) possess nationally significant natural or cultural resources, (2) be a suitable addition to the system, (3) be a feasible addition to the system, and (4) require direct NPS management instead of protection by other public agencies or the private sector. These criteria are designed to ensure that the national park system includes only the most outstanding examples of the nation's natural and cultural resources. These criteria also recognize that there are other management alternatives for preserving the nation's outstanding resources.

#### **1.3.1 National Significance**

NPS professionals, in consultation with subject-matter experts, scholars, and scientists, will determine whether a resource is nationally significant. An area will be considered nationally significant if it meets all of the following criteria:

It is an outstanding example of a particular type of resource.

It possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation's heritage.

It offers superlative opportunities for public enjoyment or for scientific study.

It retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

National significance for cultural resources will be evaluated by applying the National Historic Landmarks criteria contained in 36 CFR Part 65 (*Code of Federal Regulations*).



### 1.3.2 Suitability

An area is considered suitable for addition to the national park system if it represents a natural or cultural resource type that is not already adequately represented in the national park system, or is not comparably represented and protected for public enjoyment by other federal agencies; tribal, state, or local governments; or the private sector.

Adequacy of representation is determined on a case-by-case basis by comparing the potential addition to other comparably managed areas representing the same resource type, while considering differences or similarities in the character, quality, quantity, or combination of resource values. The comparative analysis also addresses rarity of the resources, interpretive and educational potential, and similar resources already protected in the national park system or in other public or private ownership. The comparison results in a determination of whether the proposed new area would expand, enhance, or duplicate resource protection or visitor use opportunities found in other comparably managed areas.

### 1.3.3 Feasibility

To be feasible as a new unit of the national park system, an area must be (1) of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment (taking into account current and potential impacts from sources beyond proposed park boundaries), and (2) capable of efficient administration by the Service at a reasonable cost.

In evaluating feasibility, the Service considers a variety of factors for a study area, such as the following:

- size
- boundary configurations
- current and potential uses of the study area and surrounding lands
- landownership patterns
- public enjoyment potential
- costs associated with acquisition, development, restoration, and operation
- access
- current and potential threats to the resources

- existing degradation of resources
- staffing requirements
- local planning and zoning
- the level of local and general public support (including landowners)
- the economic/socioeconomic impacts of designation as a unit of the national park system

The feasibility evaluation also considers the ability of the National Park Service to undertake new management responsibilities in light of current and projected availability of funding and personnel.

An overall evaluation of feasibility will be made after taking into account all of the above factors. However, evaluations may sometimes identify concerns or conditions, rather than simply reach a yes or no conclusion. For example, some new areas may be feasible additions to the national park system only if landowners are willing to sell, or the boundary encompasses specific areas necessary for visitor access, or state or local governments will provide appropriate assurances that adjacent land uses will remain compatible with the study area's resources and values.

### 1.3.4 Direct NPS Management

There are many excellent examples of the successful management of important natural and cultural resources by other public agencies, private conservation organizations, and individuals. The National Park Service applauds these accomplishments and actively encourages the expansion of conservation activities by state, local, and private entities and by other federal agencies. Unless direct NPS management of a studied area is identified as the clearly superior alternative, the Service will recommend that one or more of these other entities assume a lead management role, and that the area not receive national park system status.

Studies will evaluate an appropriate range of management alternatives and will identify which alternative or combination of alternatives would, in the professional judgment of the Director, be most effective and efficient in protecting significant resources and providing opportunities for appropriate public enjoyment. Alternatives for NPS management will not be

developed for study areas that fail to meet any one of the four criteria for inclusion listed in section 1.3.

In cases where a study area's resources meet criteria for national significance but do not meet other criteria for inclusion in the national park system, the Service may instead recommend an alternative status, such as "affiliated area." To be eligible for affiliated area status, the area's resources must (1) meet the same standards for significance and suitability that apply to units of the national park system; (2) require some special recognition or technical assistance beyond what is available through existing NPS programs; (3) be managed in accordance with the policies and standards that apply to units of

the national park system; and (4) be assured of sustained resource protection, as documented in a formal agreement between the Service and the nonfederal management entity. Designation as a "heritage area" is another option that may be recommended. Heritage areas have a nationally important, distinctive assemblage of resources that is best managed for conservation, recreation, education, and continued use through partnerships among public and private entities at the local or regional level. Either of these two alternatives (and others as well) would recognize an area's importance to the nation without requiring or implying management by the National Park Service.

## Appendix D: National Historic Landmark Criteria Sec 65.4

The criteria applied to evaluate properties for possible designation as National Historic Landmarks or possible determination of eligibility for National Historic Landmark designation is listed below. These criteria shall be used by NPS in the preparation, review and evaluation of National Historic Landmark studies. They shall be used by the Advisory Board in reviewing National Historic Landmark studies and preparing recommendations to the Secretary. Properties shall be designated National Historic Landmarks only if they are nationally significant. Although assessments of national significance should reflect both public perceptions and professional judgments, the evaluations of properties being considered for landmark designation are undertaken by professionals, including historians, architectural historians, archeologists and anthropologists familiar with the broad range of the nation's resources and historical themes. The criteria applied by these specialists to potential landmarks do not define significance nor set a rigid standard for quality. Rather, the criteria establish the qualitative framework in which a comparative professional analysis of national significance can occur. The final decision on whether a property possesses national significance is made by the Secretary on the basis of documentation including the comments and recommendations of the public who participate in the designation process.

(a) Specific Criteria of National Significance: The quality of national significance is ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association, and:

1. That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or
  2. That are associated importantly with the lives of persons nationally significant in the history of the United States; or
  3. That represent some great idea or ideal of the American people; or
  4. That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or
  5. That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
  6. That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.
- (b) Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties that have achieved significance within the past 50 years are not eligible for designation. Such properties, however, will qualify if they fall within the following categories:
1. A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or
  2. A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or



events of transcendent importance in the nation's history and the association consequential; or

3. A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation's history and the association consequential; or
4. A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building or structure directly associated with the productive life of that person exists; or
5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or from an exceptionally significant event; or
6. A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or
7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or
8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

## Appendix D: Japanese American Wartime Incarceration Properties, Summary of Known Recognition, July 2011

Name of Property	Location	Status of Federal/ State Designations <sup>1</sup>	Tangible Recognition: Markers, Monuments, Memorials, and Museums <sup>2</sup>
<i>Wartime Civil Control Administration</i>			
Fresno Assembly Center	Fresno County, CA	No Federal designation, CA Historical Landmark	Marker, 1992; memorial, 2010
Marysville Assembly Center, aka Arboga Assembly Center	Yuba County, CA	No Federal designation, CA Historical Landmark	None known
Mayer Assembly Center	Yavapai County, AZ	No Federal designation	None known
Merced Assembly Center	Merced County, CA	No Federal designation, CA Historical Landmark	Marker, 1982; monument and memorial plaza, 2010
Pinedale Assembly Center	Fresno County, CA	No Federal designation, CA Historical Landmark	Memorial plaza
Pomona Assembly Center	Los Angeles County, CA	No Federal designation, CA Historical Landmark	None known
Portland Assembly Center	Multnomah County, OR	No Federal designation	Marker
Puyallup Assembly Center, aka Camp Harmony	Pierce County, WA	No Federal designation	Memorial courtyard with sculpture and markers
Sacramento Assembly Center, aka Walerga Assembly Center	Sacramento County, CA	No Federal designation, CA Historical Landmark	Marker, 1987; memorial grove of cherry trees
Salinas Assembly Center	Monterey County, CA	No Federal designation, CA Historical Landmark	Marker, 1984; Day of Remembrance Memorial Garden, 2010
Santa Anita Assembly Center	Los Angeles County, CA	Determined eligible for National Register 2006, CA Historical Landmark	Marker
Stockton Assembly Center	San Joaquin County, CA	No Federal designation, CA Historical Landmark	Marker
Tanforan Assembly Center	San Bruno, San Mateo County, CA	No Federal designation, CA Historical Landmark	Marker
Tulare Assembly Center	Tulare County, CA	No Federal designation, CA Historical Landmark	None known
Turlock Assembly Center	Stanislaus County, CA	No Federal designation, CA Historical Landmark	Marker, 2010

<sup>1</sup> Federal designation includes listing in the National Register of Historic Places, designation as a National Historic Landmark, or some other Federal effort to honor the site for its relation to the Japanese American wartime experience.

<sup>2</sup> A marker identifies the site and its relation to the World War II experience of Japanese Americans; text generally is mounted on a post or solid base. A monument is an artistic work that serves as a memorial to the Japanese American wartime experience. A memorial is a space dedicated to the Japanese American wartime experience, and may include landscape, architectural, sculptural, and educational elements. Museums include exhibits that interpret Japanese American wartime experiences.



Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
<i>War Relocation Authority Centers</i>			
Gila River Relocation Center: Butte Camp and Canal Camp	Pinal County, AZ	None	Markers at both camps; memorial exhibit at Gila River Indian Reservation Cultural Center
Granada Relocation Center, aka Amache	Prowers County, CO	National Register 5-18-94; National Historic Landmark 2-10-06; National Historic Site 1-9-07	Cemetery with monument
Heart Mountain Relocation Center	Park County, WY	National Register 12-19-85; National Historic Landmark 9-20-06	Memorial park with markers and honor roll; Interpretive Learning Center, August 2011
Jerome Relocation Center	Chicot and Drew Counties, AR	None	Monument
Manzanar Relocation Center, originally Owens Valley Reception Center	Inyo County, CA	National Register 7-30-76; National Historic Landmark 2-4-85; National Historic Site 1992; CA Historical Landmark 1972	Memorial cemetery; markers; monument; interpretive center
Minidoka Relocation Center	Jerome County, ID	National Register 7-10-79; National Monument 2001; National Historic Site 2008	Monument; markers; exhibit at Jerome County Historical Museum; state marker on State Highway 25
Poston Relocation Center: Poston I, II, and III	La Paz County, AZ	None	Memorial with monument and educational kiosk, 1992
Rohwer Relocation Center	Desha County, AR	National Register 7-30-74	None
Rohwer Memorial Cemetery	Desha County, AR	National Register 7-6-92; National Historic Landmark 7-6-92	Memorial cemetery with monuments and markers
Topaz Relocation Center, aka Central Utah or Abraham Relocation Center	Millard County, UT	National Register 1-2-74; National Historic Landmark 3-29-07	Original monument, 1976; replacement monument, 2002; monument to Topaz soldiers, 2005
Tule Lake Relocation Center	Modoc County, CA	National Register 2-17-06; National Historic Landmark 2-17-06; WWII Valor in the Pacific National Monument 12-5-08; CA Historical Landmark	Monument, 1979; marker and collections at BLM in Klamath Falls, at Modoc County Fairgrounds, and at Lava Beds National Monument
<i>War Relocation Authority Internment/Detention Facilities</i>			
Leupp Isolation Camp	Coconino County, AZ	No Federal designation	None known
Moab Isolation Center	Grand County, UT	National Register 5-2-94 (Dalton Wells CCC Camp/Moab Relocation Center)	None known

Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
Camp Tulelake	Tule Lake National Wildlife Refuge, CA	No Federal designation	None known
<i>War Relocation Authority Centers, Supplementary Sites</i>			
Antelope Springs	BLM/Fillmore, Millard County, UT	No Federal designation	None known
Cow Creek Camp	Death Valley National Park, Inyo County, CA	Cow Creek Historic District, determined NR eligible for association with CCC, 1989	None known
<i>Department of Justice Internment/Detention Facilities</i>			
Catalina Federal Honor Camp	Coronado National Forest, AZ	Named “Gordon Hirabayashi Recreation Site” by U.S. Forest Service, 1999	Interpretive kiosk built by USFS
Crystal City Internment Camp (INS)	Zavala County, TX	No Federal designation	Texas State Marker, 2007; monument, 1980s
Fort Lincoln Internment Camp (INS)	Bismarck, Burleigh County, ND	No Federal designation	None known
Fort Missoula Internment Camp (INS)	Missoula County, MT	National Register 4-29-87	Monument and museum; now called “Historical Museum at Fort Missoula”
Fort Stanton	Lincoln County, NM	National Register 4-13-73	Museum
Kenedy Internment Camp (INS)	Karnes County, TX	No Federal designation	Texas State Subject Marker at camp cemetery; marker in Kenedy; and materials at Kenedy Public Library
Kooskia Internment Camp	Clearwater National Forest, Idaho County, ID	No Federal designation	None known
Old Raton Ranch Camp	Santa Fe County, NM	No Federal designation	None known
Santa Fe Internment Camp	Santa Fe County, NM	No Federal designation	Marker
Seagoville Internment Camp (WRA camp)	Dallas County, TX	No Federal designation	None known
Sharp Park Detention Facility	Pacifica, San Mateo County, CA	No Federal designation	None known
U.S. Federal Penitentiary, Leavenworth	Leavenworth County, KS	No Federal designation	None known
U.S. Federal Penitentiary, McNeil Island	Steilacoom, Pierce County, WA	No Federal designation	None known
U.S. Immigration Station, Ellis Island	New York Harbor, NY	National Register 10- 15-66; part of Statue of Liberty National Monument	Exhibit on Japanese American wartime experiences opened in July 2010
U.S. Immigration Station, O‘ahu	Honolulu County, HI	National Register 8-14-73	None known

Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
<i>U.S. Army Detention Facilities</i>			
Angel Island, North Garrison of Fort McDowell	Marin County, CA	National Register 10-14-71; National Historic Landmark 12-9-97; CA Historical Landmark; now Angel Island State Park	Markers, monument, and museum
Camp Florence	Florence, Pinal County, AZ	No Federal designation	None known
Camp Forrest	Tullahoma, Coffee County, TN	No Federal designation	None known
Camp Livingston	Alexandria, Rapides Parish, LA	No Federal designation	None known
Camp Lordsburg	Hidalgo County, NM	No Federal designation	Museum nearby
Fort Bliss	El Paso County, TX	National Register 5-7-98 (included in Fort Bliss Main Post Historic District)	None known
Fort George G. Meade	Anne Arundel County, MD	No Federal designation	None known
Fort Richardson	Anchorage Borough, AK	No Federal designation	None known
Fort Sam Houston	San Antonio, TX	National Register 5-15-75; National Historic Landmark 5-15-75 (not for Japanese American association)	None known
Fort Sill Internment Camp	Comanche County, OK	National Register 10-15-66 (not for Japanese American association); National Historic Landmark 12-19-60	None known
Honouliuli Internment Camp	Honolulu County, HI	National Register 2-21-2012	None known
Kilauea Military Camp	Hawai'i County, HI	No Federal designation	None known
Sand Island Detention Camp	Honolulu County, HI	No Federal designation	None known
Stringtown Internment Camp	Stringtown, Atoka County, OK	No Federal designation	None known
<i>Other Internment/Detention Facilities</i>			
Haiku Camp	Maui County, HI	No Federal recognition	None known
Kalaheo Stockade	Kaua'i County, HI	No Federal designation	None known
Honolulu Police Department and Yokohama Specie Bank	Honolulu County, HI	National Register 6-19-1973 (included in Merchant Street Historic District, not for Japanese American association)	None known



Name of Property	Location	Status of Federal/ State Designations	Tangible Recognition: Markers, Monuments, Memorials, and Museums
Kaua'i County Courthouse	Kaua'i County, HI	National Register 12-17-1981 (included in Lihue Civic Center Historic District, not for Japanese American association)	None known
Lāna'i City Jail and Courthouse	Maui County, HI	No Federal designation	None known
Lihue Plantation Gymnasium	Kaua'i County, HI	No Federal designation	None known
Maui County Jail, Courthouse, and Police Station	Maui County, HI	National Register 8-20-1988 (included in Wailuku Civic Center Historic District, not for Japanese American association)	None known
Hilo Independent Japanese Language School	Hawai'i County, HI	No Federal designation	None known
Waiakea Prison Camp	Hawai'i County, HI	No Federal designation	None known
Wailua County Jail	Kaua'i County, HI	No Federal designation	None known
Waimea County Jail	Kaua'i County, HI	No Federal designation	None known



# REFERENCES

## LIST OF HISTORICAL IMAGES

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Chapter 2 divider	Coast Guard Station at Sand Island, O‘ahu, November 1946. Courtesy of the Japanese Cultural Center of Hawai‘i, Honolulu, HI.
5	Japanese store, Honolulu, c. 1895–1910. Library of Congress, Prints & Photographs Division, Washington, DC: LC-DIG-det-4a20736.
6	Japanese emigrants on sisal plantation, Hawai‘i, c. 1910–1915. Library of Congress, George Grantham Bain Collection, Prints & Photographs Division, Washington, DC: LC-DIG-ggbain-13386.
7	Pearl Harbor Naval Base and the U.S.S. <i>Shaw</i> ablaze following the Japanese attack, December 7, 1941. Library of Congress, Prints & Photographs Division, Washington, DC: LC-USZ62-16555.
9	Drawing of the women’s internee compound at Honouliuli by Dan Toru Nishikawa, 1943. Courtesy of the Japanese Cultural Center of Hawai‘i, Honolulu, HI.
10	Civilian Exclusion Order demanding the removal of all persons of Japanese ancestry, San Francisco. Photograph by Dorothea Lange, April 11, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
10	In response to Civilian Exclusion Order No. 20, San Francisco residents of Japanese ancestry wait to register with the Civil Control Station. Photograph by Dorothea Lange, April 25, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
12	Families board a bus in Centerville, CA that will take them to a temporary detention camp known as an “assembly center.” Photograph by Dorothea Lange, May 9, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
12	A grandfather and grandchildren await transportation, Hayward, CA. Photograph by Dorothea Lange, May 8, 1942. Courtesy of the Bancroft Library, University of California, Berkeley.
12	Families arrive at the WRA center at Heart Mountain, WY, September 1943. Photograph by Bud Aoyama. Courtesy of the Bancroft Library, University of California, Berkeley.
12	Arrivals at the Salinas Assembly Center, California. Photograph by Clem Albers, March 31, 1942. Courtesy of the Bancroft Library, University of



California, Berkeley.

- 19 Gate at Sand Island Internment Camp. Photographer unknown, c. 1942. U.S. Army Museum of Hawai‘i, Honolulu, HI.
- 19 Detainees at Sand Island Internment Camp lived in tents for six months until barracks were constructed. Photographer unknown, c. 1942. U.S. Army Museum of Hawai‘i, Honolulu, HI.
- 21 Portraits of internees by George Hoshida. Courtesy of the George Hoshida Collection. Gift of June Hoshida Honma, Sandra Hoshida, and Carole Hoshida Kanada. Japanese American National Museum, Los Angeles, CA.
- 24 View of tents in Compound # 4 for POWs at Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Courtesy of Hawai‘i’s Plantation Village, Waipahu, HI.
- 30 Kilauea Military Detention Camp. Drawing by George Hoshida, 1942. Courtesy of the George Hoshida Collection. Gift of June Hoshida Honma, Sandra Hoshida, and Carole Hoshida Kanada. Japanese American National Museum, Los Angeles, CA.
- 31 1932 aerial photograph of the landing field at Hilo Airport, near the Waiakea Prison Camp. Courtesy Hawai‘i Department of Transportation, Honolulu, HI.
- 34 Wailua County Jail, Kaua‘i, possibly with internee housing in the background. Photo taken by Lt. James Daniels during WWII. Courtesy of the Kaua‘i Museum Archives, Lihue, HI.
- Chapter 3 divider A view into daily life at Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Courtesy of Hawai‘i’s Plantation Village, Waipahu, HI.
- 42 Barracks and tents at Honouliuli. A portion of the rock wall visible in the background still stands on the site today. Photo by R. H. Lodge, c. 1945, courtesy of Hawai‘i’s Plantation Village, Waipahu, HI.
- 44 Sketch of internees working on crafts at Honouliuli by Dan T. Nishikawa, April 29, 1943. Courtesy of the Japanese Cultural Center of Hawai‘i, Dan Toru Nishikawa Family Collection, Honolulu, HI.
- 49 The U.S. Immigration Station, Honolulu, as it appeared in 1938. Photo on display at the U.S. Immigration Station, Honolulu.
- 70 Japanese American heads of family and persons living alone wait outside the Civil Control Station, San Francisco, in response to Civilian Exclusion Order Number 20. Photograph by Dorothea Lange, April 25, 1942. National Archives and Records Administration, College Park, MD.
- 72 This photograph of Manzanar, taken by Ansel Adams in 1943, illustrates the exposed, remote conditions of the majority of mainland incarceration sites. Manzanar War Relocation Center Photographs, Library of Congress, Prints & Photographs Division, Washington, DC: LC-DIG-ppprs-00284.
- 73 Tule Lake: internees contribute to a large-scale agricultural operation typical

of mainland sites, c. 1942–43. Farm Security Administration/Office of War Information Collection, Library of Congress Prints & Photographs Division, Washington, DC: LC-DIG-fsac-1a35013.

- 73 Women pose outside a barber shop at Tule Lake, c. 1942–43. Farm Security Administration/Office of War Information Collection, Library of Congress Prints & Photographs Division, Washington, DC: LC-DIG-fsac-1a35014.
- 77 A 1940 photograph of Camp Tulelake, looking northeast, when the camp was being used by the Civilian Conservation Corps. National Archives and Records Administration, College Park, MD.
- 84 The church in the Aleutian village Kashega in 1938, photographed by Alan G. May during a Smithsonian Institution Archeological Expedition to the Aleutian Islands. Alan G. May papers, Archives and Special Collections, Consortium Library, University of Alaska Anchorage.
- 84 Unangan children forcibly removed from their homes and relocated to Southeast Alaska. Photo: George Dale, 1942. Courtesy Alaska State Library, Evelyn Butler and George Dale Collection, ASL-P306-1056.

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