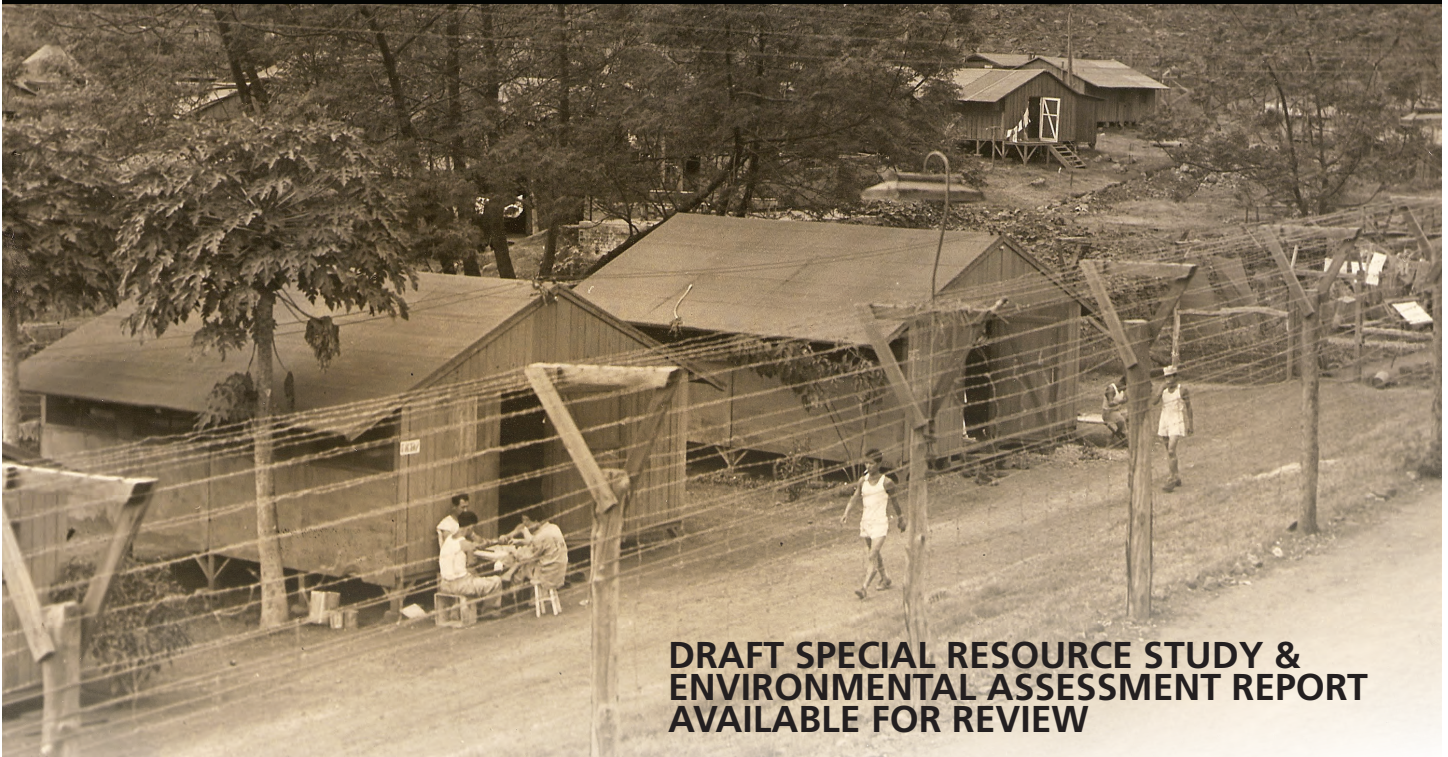


# Honouliuli Gulch and Associated Sites Special Resource Study

National Park Service

U.S. Department of the Interior



## DRAFT SPECIAL RESOURCE STUDY & ENVIRONMENTAL ASSESSMENT REPORT AVAILABLE FOR REVIEW

### NEWSLETTER #2 SPRING 2014

*This newsletter provides a summary of the Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment, as prepared by the National Park Service.*

*The full draft report is posted at <http://www.nps.gov/pwro/honouliuli>, and limited printed copies are available. This is your opportunity to review this document and provide us with your comments. The public review of the draft report and environmental assessment is being conducted in compliance with the National Environmental Policy Act and the National Historic Preservation Act.*

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Dear Friends,

It is with great pleasure that the National Park Service offers to you for review and comment the Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment. This newsletter contains the Executive Summary of the draft study report and information about how you may comment on the report and share your thoughts with us. The full report is available on the study website or by request.

The NPS launched this study with an introductory newsletter and public meetings in February and March 2011. The alternatives presented and analyzed in this report were developed based on NPS special resource study criteria and the comments that we heard from you during public scoping.

This draft study report is available for public review for 60 days, with comments due to us by **July 15, 2014**. We welcome your comments through email, our website, mail, or at one of our public meetings if you are able to attend. We are particularly interested in your thoughts about the alternative management approaches that we have presented. Your comments will assist the NPS in revising and finalizing this report, and in determining which alternative to recommend as the most effective and efficient approach to protect significant resources and provide for visitor enjoyment.

Thank you for your continued involvement in this study, and we look forward to hearing from you.

**Mahalo,  
NPS Study Team**

Photo: A view into daily life at Honouliuli Internment Camp, c. 1945. Photo by R. H. Lodge, courtesy Hawai'i's Plantation Village.

## ABSTRACT

The National Park Service (NPS) prepared the *Honouliuli Gulch and Associated Sites Draft Special Resource Study and Environmental Assessment* to determine whether the Honouliuli Internment Camp and associated World War II internment sites in Hawai‘i are nationally significant, suitable, and feasible for inclusion in the national park system. Congress authorized this study in 2009. The study evaluates 17 sites.

Through the special resource study process, the NPS made the following determinations about the study sites:

- The Honouliuli Internment Camp and the U.S. Immigration Station on the island of O‘ahu are **nationally significant** for their central role as internment sites in Hawai‘i during World War II. They meet all four of the NPS criteria for national significance. The other 15 sites associated were used for shorter periods of time, interned fewer numbers of people, or have been substantially changed since the period of significance. As such, they do not meet the criteria for national significance. Many of these sites are, however, listed or eligible for listing in the National Register of Historic Places and/or provide opportunities to further interpret the history of internment in Hawai‘i during World War II.
- The Honouliuli Internment Camp and the U.S. Immigration Station depict a distinct and important aspect of American history associated with civil liberties in times of conflict that is not adequately represented or protected elsewhere, and are therefore **suitable for inclusion** in the national park system.
- The Honouliuli Internment Camp historic site is **a feasible addition** to the national park system conditional upon securing public access to the site. The U.S. Immigration Station complex is not a feasible addition to the national park system because the complex is currently used by the U.S. Department of Homeland Security and the State of Hawai‘i Department of Health.
- There is a **need for NPS management** of the Honouliuli Internment Camp historic site in partnership with others to fully protect resources and to enhance visitor appreciation of the nationally significant resources and important stories associated with it.

The NPS evaluated two alternatives in the draft study. One includes a role for the NPS.

**Alternative A: Continuation of Management.** This is the “no action” alternative. Sites, organizations, and programs significant to the internment history in Hawai‘i would

continue to operate independently by existing landowners, agencies, or organizations without additional NPS management or assistance other than what is currently available through existing authorities and grant programs.

### **Alternative B: Honouliuli National Historic Site or Monument—A Unit of the National Park System.**

Congress would establish Honouliuli National Historic Site as a new unit of the national park system. Alternatively, a national monument managed by the NPS could be established. The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that provide road access and opportunities for visitor facilities. The NPS would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai‘i during World War II. The national historic site or monument would be supported by operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor. The NPS could provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai‘i during World War II.

The NPS prepared an environmental assessment to identify and analyze the potential environmental and socioeconomic consequences of the two alternatives. The NPS concluded that alternative B would be the environmentally preferable alternative because it would protect nationally significant resources, provide opportunities for visitors to learn about the internment history in Hawai‘i during World War II, provide greater socioeconomic benefits, and apply long-standing NPS policies and actions to the Honouliuli Internment Camp historic site.



Remaining World War II-era structure, Honouliuli Internment Camp. Photo: Valentino Valdez.



# EXECUTIVE SUMMARY

## Background and Study Process

The Department of the Interior, Environment, and Related Agencies Appropriations Act of 2010, Title 1, Section 125 (123 Stat. 2932), October 30, 2009) authorized the National Park Service (NPS) to “conduct a special resource study of the national significance, suitability, and feasibility of including the Honouliuli Gulch and associated sites within the State of Hawai‘i in the National Park System.” The legislation stated, “The study shall evaluate the Honouliuli Gulch, associated sites located on O‘ahu, and other islands located in the State of Hawai‘i with respect to—

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

This legislation was introduced in the Senate by Senator Daniel Inouye and Senator Daniel Akaka of Hawai‘i, and in the House by Representative Mazie Hirono and former Representative and current Hawai‘i Governor, Neil

Abercrombie, with numerous co-sponsors from across the United States and the Pacific territories (American Samoa, Guam, and the Northern Mariana Islands).

This study provides information to aid the National Park Service in determining whether the study sites meet eligibility, suitability, and feasibility criteria for designation as units of the national park system. The study follows the process established by the National Park System New Area Studies Act (P.L. 105-391, 16 U.S.C. Sec. 1a-5) and addresses the criteria for new areas outlined in NPS *Management Policies 2006*.

## Legislative and Policy Direction

The National Park System New Area Studies Act requires that special resource studies be prepared in compliance with the National Environmental Policy Act (NEPA). The NPS determined that an environmental assessment (EA) is a sufficient level of environmental analysis for this study. This study complies with the National Historic Preservation Act, Section 106 and 110 requirements. Section 106 requires federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process is being coordinated with the National



Foundation of former mess hall, Honouliuli Internment Camp. Photo: NPS, 2013.





Environmental Policy Act process for this special resource study. No significant impacts or effects are anticipated from the findings and recommendations of this study.

According to NPS management policies, a proposed addition to the national park system will receive a favorable recommendation from the NPS only if it meets all of the following four criteria for inclusion:

- it possesses nationally significant natural or cultural resources;
- it is a suitable addition to the system;
- it is a feasible addition to the system; and
- it requires direct NPS management, instead of alternative 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, while recognizing that there are other management alternatives for preserving the nation's outstanding resources.

Alternatives for NPS management are developed for sites that meet all four of the criteria for inclusion.

## Public Involvement

### PUBLIC SCOPING

The NPS launched public scoping for this study in February 2011. A notice of scoping was published in the *Federal Register* on May 2, 2011 (Vol.76, No. 83, 24514–15). The study team produced and distributed an informational newsletter and press releases to the media, individuals, organizations, and government officials. Public information was made available on the National Park Service's Planning, Environment and Public Comment (PEPC) website and project website at [www.nps.gov/pwro/honouliuli](http://www.nps.gov/pwro/honouliuli).

In February and March 2011, the study team held eight public scoping meetings on the six main islands in Hawai'i. Over 100 people attended the public meetings. Local, state, and federal government officials and stakeholders were also consulted. During this time, numerous articles and opinion pieces about the study appeared in area newspapers.

The comment period for public scoping extended to June 1, 2011, thirty days after publication of the notice of scoping in the *Federal Register*.

Photos: Honouliuli Day of Remembrance, 2011. NPS.



## Historical Background

Shortly after the surprise bombing of Pearl Harbor on December 7, 1941 by the Japanese Navy, the United States imposed martial law on the territory of Hawai'i and formally entered into World War II. The U.S. military and FBI began rounding up and imprisoning persons of Japanese and European ancestry in Hawai'i on suspicion of disloyalty to the United States. The legal authority in Hawai'i for the internment was martial law, which began on December 7, 1941 and lasted until October 24, 1944. Initially internees were confined in local areas, mostly prisons, courthouses, and similar facilities throughout the Hawaiian Islands. Most were then sent to the U.S. Immigration Station on O'ahu before being transferred to mainland internment camps. Of the 158,000 people of Japanese ancestry in Hawai'i at the beginning of World War II, approximately 2,000 were interned.

On the mainland West Coast, all individuals of Japanese ancestry—two-thirds of them American-born citizens—were forced from their homes under Executive Order 9066, issued on February 19, 1942. They were rounded up and sent to temporary detention centers before being sent to live out the remainder of the war at isolated large-scale camps located throughout the western states and Arkansas. The mass incarceration of 120,000 persons of Japanese ancestry was the largest forced removal of people in the history of the United States.

In Hawai'i, by March 1943, Honouliuli Internment Camp had been constructed on O'ahu to intern citizens, resident aliens, and prisoners of war. The camp held approximately 320 internees and became the largest prisoner-of-war (POW) camp in Hawai'i with nearly 4,000 individuals from Korea, Okinawa, Taiwan, Japan, and Italy. Honouliuli was the last, largest, and longest-used World War II confinement site in Hawai'i; it closed in 1945 for civilian internees and may have been used into 1946 for prisoners of war.

More than 40 years after World War II, the Civil Liberties Act of 1988 was signed into law by President Ronald Reagan. It acknowledged the fundamental injustice of the mass incarceration based on race and formally apologized on behalf of the people of the United States. The act stated the World War II mass incarceration of Japanese Americans was the result of "racial prejudice, wartime hysteria and a lack of political leadership."

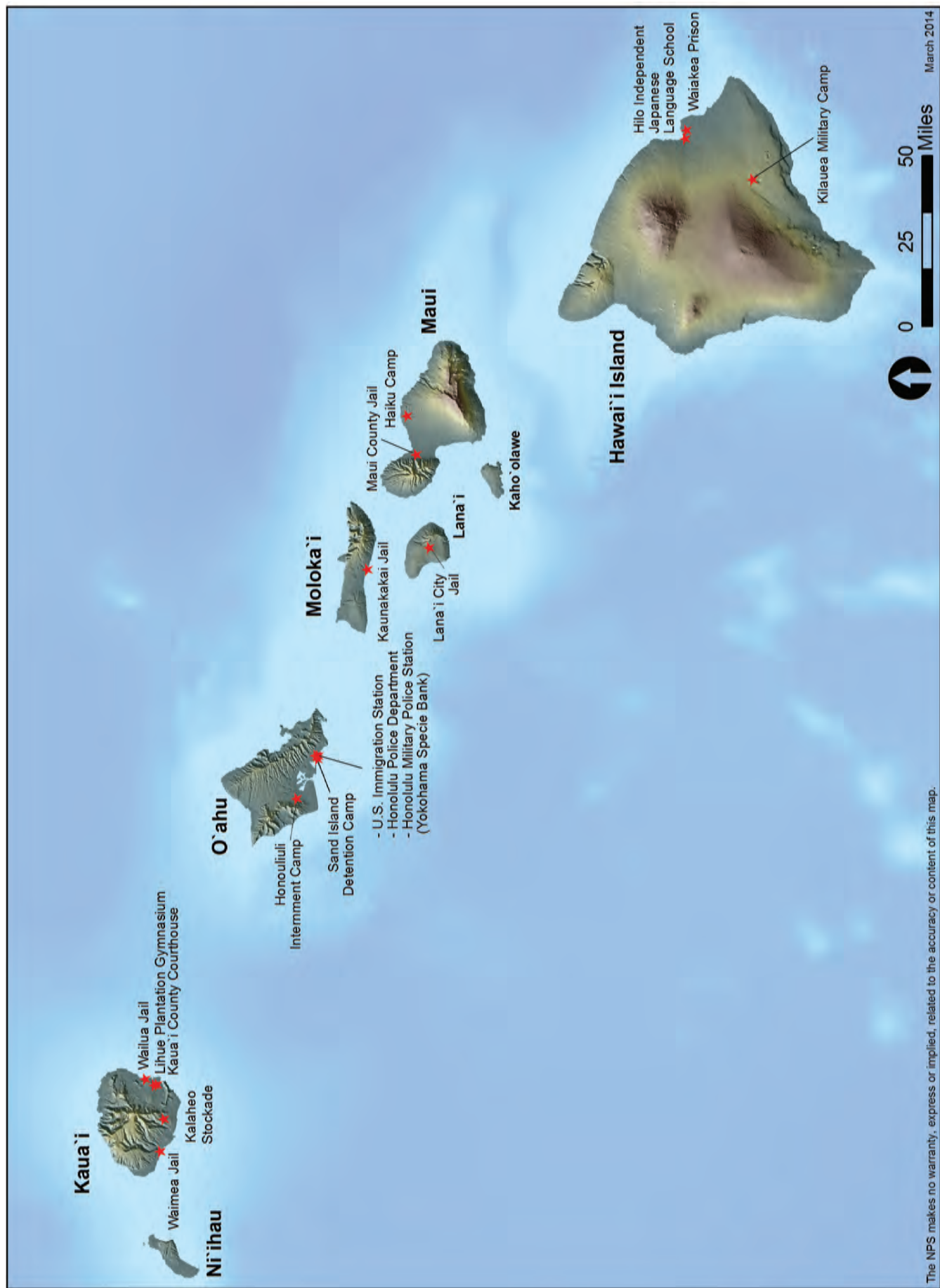
## Study Sites

The study evaluates 17 sites associated with the history of internment in Hawai'i (See Map: Confinement sites in Hawai'i during World War II). A preliminary list of 13 sites was developed based on information obtained through personal interviews, declassified documents from the Federal Bureau of Investigation and Department

of Justice, military files, newspapers, photographs, and numerous books and essays. The University of Hawai'i, Japanese Cultural Center of Hawai'i, and Trans-Sierran Archaeological Research provided information about internment sites in Hawai'i. Site visits by the study team were conducted where possible to determine current conditions and integrity of the sites. Four additional sites were recorded during the preparation of this report. were conducted where possible to determine current conditions and integrity of the sites.



Photos (top to bottom): **1.** Detainees at Sand Island Detention Camp on O'ahu lived in tents for six months until barracks were constructed. Photographer unknown, c. 1942, U.S. Army Museum of Hawai'i. **2.** The U.S. Immigration Station, Honolulu, as it appeared in 1938. Photo on display at the U.S. Immigration Station. **3.** Main entry, U.S. Immigration Station former administrative building. Photo: Burton and Farrell 2007.



**Internment sites in Hawai'i during World War II.**



## Study Findings

### NATIONAL SIGNIFICANCE

The National Park Service (NPS) uses four basic criteria to evaluate the significance of proposed areas. These criteria, listed in the National Park Service *Management Policies 2006*, state that a resource is nationally significant if it meets all of the following conditions:

- 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.

The NPS evaluates national significance for cultural resources by applying the national historic landmarks (NHL) criteria contained in 36 CFR Part 65.

National Park Service professionals consult with subject matter experts, scholars, and scientists in determining whether a study area is nationally significant. Resource experts and scholars within and beyond the NPS contributed expertise, research, and technical review of the statement of significance.

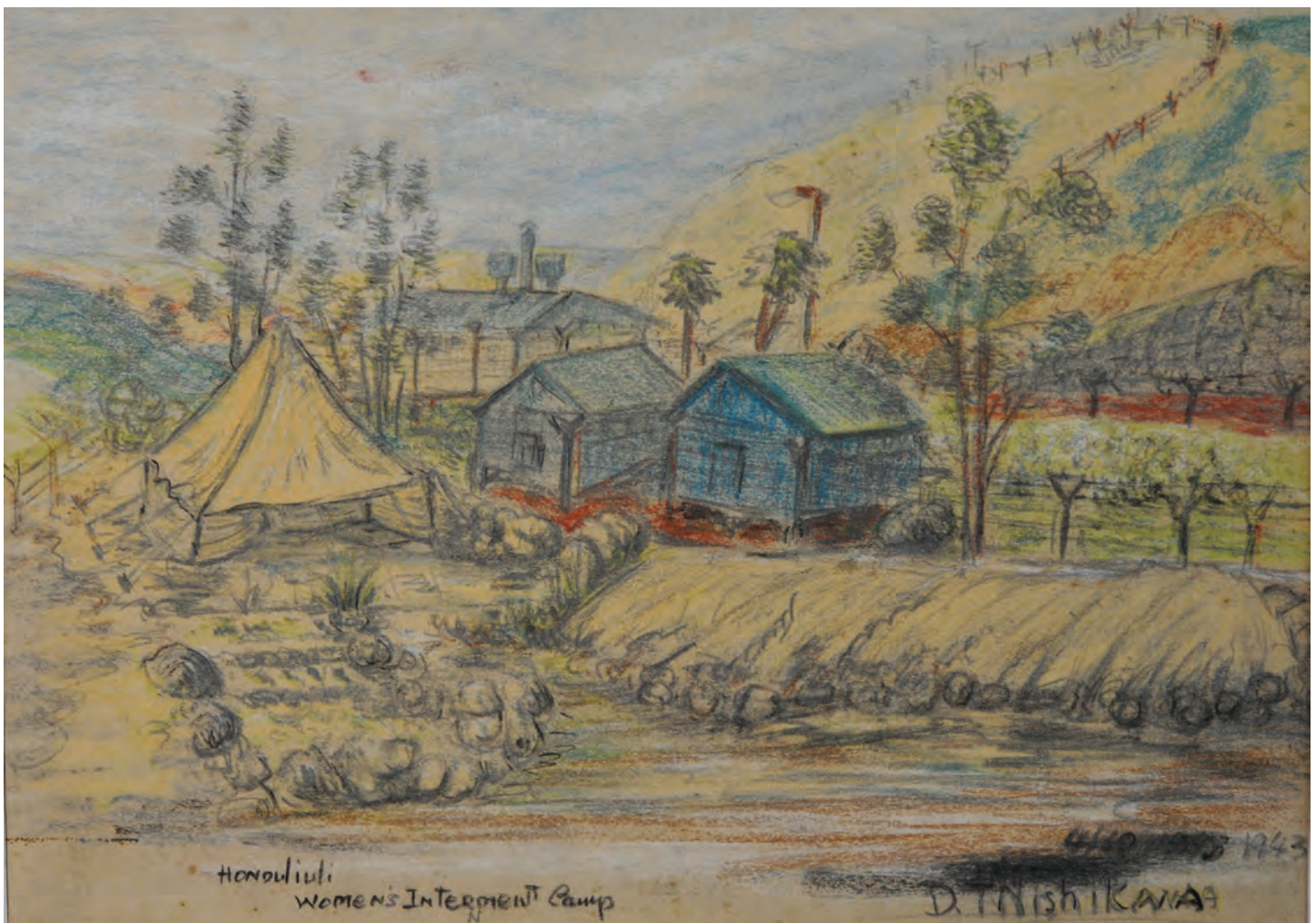
### NATIONALLY SIGNIFICANT SITES

The internment and incarceration of Japanese Americans and others during World War II on the mainland and in Hawai'i are nationally significant events that shape our understanding and commitment to civil liberties and the fair treatment of all citizens, regardless of race. By identifying the commonalities and distinctions between mainland and Hawai'i stories, this study concludes that the internment in Hawai'i is of national significance, distinct



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 Hawai'i's Plantation Village.





Drawing of the women's internee compound at Honouliuli by Dan T. Nishikawa, April 10, 1943. Image courtesy of the Japanese Cultural Center of Hawai'i, Dan Toru Nishikawa Family Collection.

from mainland incarceration. Through it, we are able to more fully understand the abrogation of civil liberties that occurred in the U.S. and its territories.

More than 2,000 residents of Japanese and European ancestry living in Hawai'i were incarcerated in at least 17 locations in Hawai'i during World War II, including Honouliuli Internment Camp, Sand Island, the U.S. Immigration Station, Honolulu Police Department, and Honolulu Military Police Station on O'ahu; the Kilauea Military Camp, Waiakea Prison, and the Hilo Independent Japanese Language School on the Big Island; Haiku Camp and Maui County Jail on Maui; the Kaunakakai Jail on Molokai; the Lāna'i City Jail on Lāna'i; and the Kalaheo Stockade, Waimea Jail, Waialua Jail, Lihue Plantation Gymnasium, and Kaua'i County Courthouse on Kaua'i.

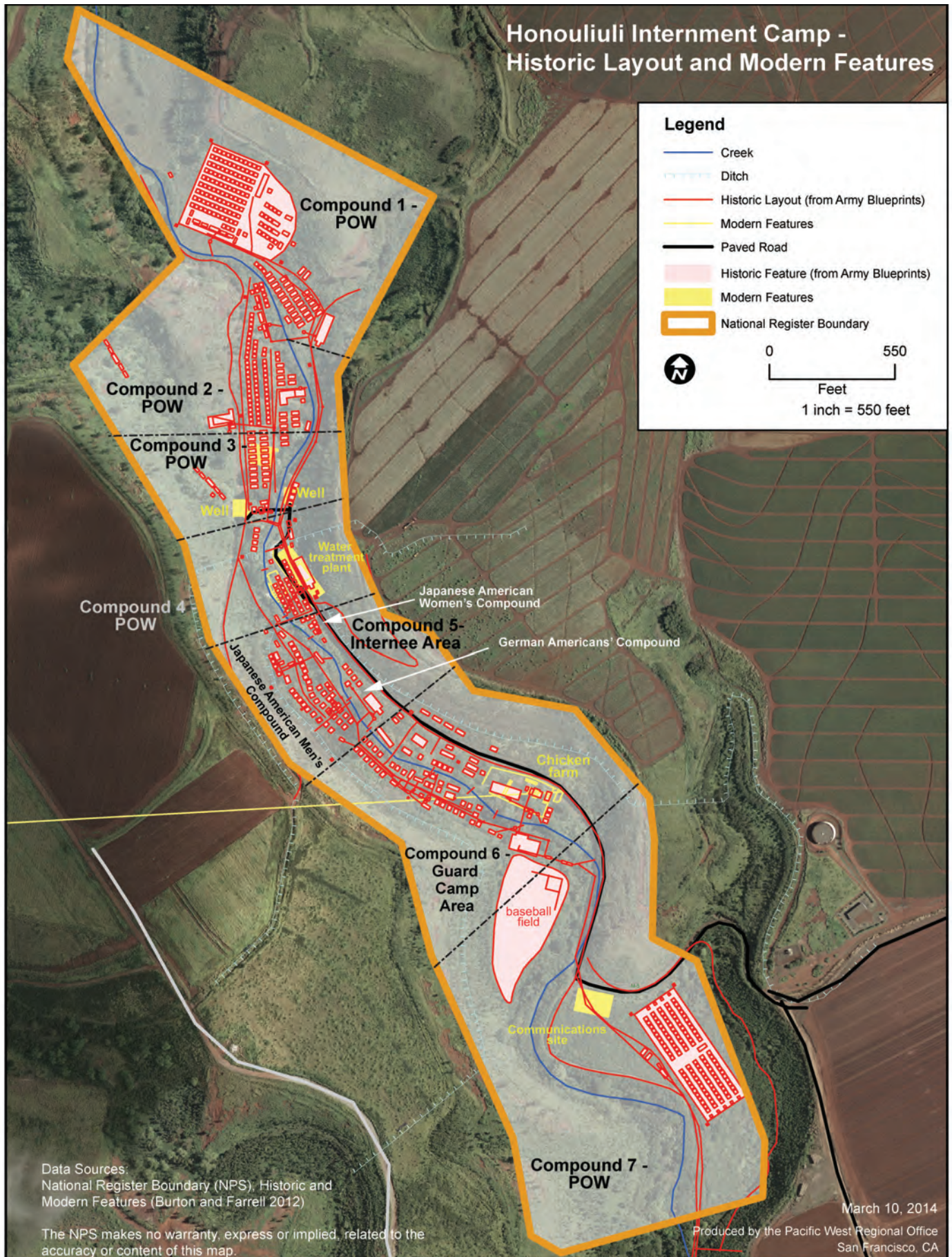
The 17 internment sites in Hawai'i were evaluated for their role and importance in telling the internment story. Based on the findings and analysis in this study, two sites, Honouliuli Internment Camp and the U.S. Immigration Station, are found to be nationally significant as defined in the NHL guidelines.

### Honouliuli Internment Camp (Waipahu, O'ahu)

The Honouliuli Internment Camp was located in Honouliuli Gulch, west of Waipahu, on the island of O'ahu. Opened in 1943, the Honouliuli Internment Camp was the last, largest, and longest-used World War II confinement site in Hawai'i. The camp was built to intern Japanese and European Americans, Japanese and European resident aliens, and POWs captured in military operations during World War II. Honouliuli Internment Camp, protected by its isolated location amidst agricultural lands and nearly hidden by dense vegetation for 60 years, appears to offer the greatest potential to preserve resources and interpret the history of the WWII internment.

The internment camp held 320 internees, mostly second-generation Japanese Americans, but also Japanese, German, and Italian nationals. It was also the largest prisoner of war camp in Hawai'i, incarcerating nearly 4,000 individuals. Recent archeological surveys have resulted in the identification of over 130 archeological features.







## U.S. Immigration Station (Honolulu, O‘ahu)

The U.S. Immigration Station, located on Ala Moana Boulevard in Honolulu, is nationally significant as the location where all Hawai‘i internees were processed or temporarily incarcerated after the attack on Pearl Harbor on December 7, 1941. Unlike most of the other internment sites in Hawai‘i that only served local, short-term needs, the U.S. Immigration Station had a broad, statewide role over an extended period. It served as a temporary internment location, but also as a center of legal administration.

## Other Internment Sites in Hawai‘i

The other 15 sites associated with internment considered in this study were used for shorter periods of time, interned fewer numbers of people, or have been substantially changed since the period of significance. As such, they do not meet the criteria for national significance as defined in the special resource study and national historic landmark criteria. Many of these sites are, however, listed or eligible for listing in the National Register of Historic Places and/or provide opportunities to further interpret the story of internment and incarceration in the U.S. during World War II.

## SUITABILITY

To be considered suitable for addition to the national park system, an area must represent 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 for nationally significant sites 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 analysis 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.

Honouliuli Internment Camp and the U.S. Immigration Station offer a special opportunity to expand our nation’s history of incarceration of civilians during World War II. The educational potential of these sites is enhanced by their quality, or high level of integrity, as well as the quantity of their extant resources. Based on the analysis of comparable resources and interpretation already represented in units of the national park system,

or protected and interpreted by others, this study concludes that Honouliuli Internment Camp and the U.S. Immigration Station associated with the incarceration of civilians and prisoners of war in Hawai‘i during World War II depict a distinct and important aspect of American history associated with civil liberties in times of conflict that is not adequately represented or protected elsewhere, and are therefore suitable for inclusion in the national park system.

## 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 National Park Service at a reasonable cost.

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

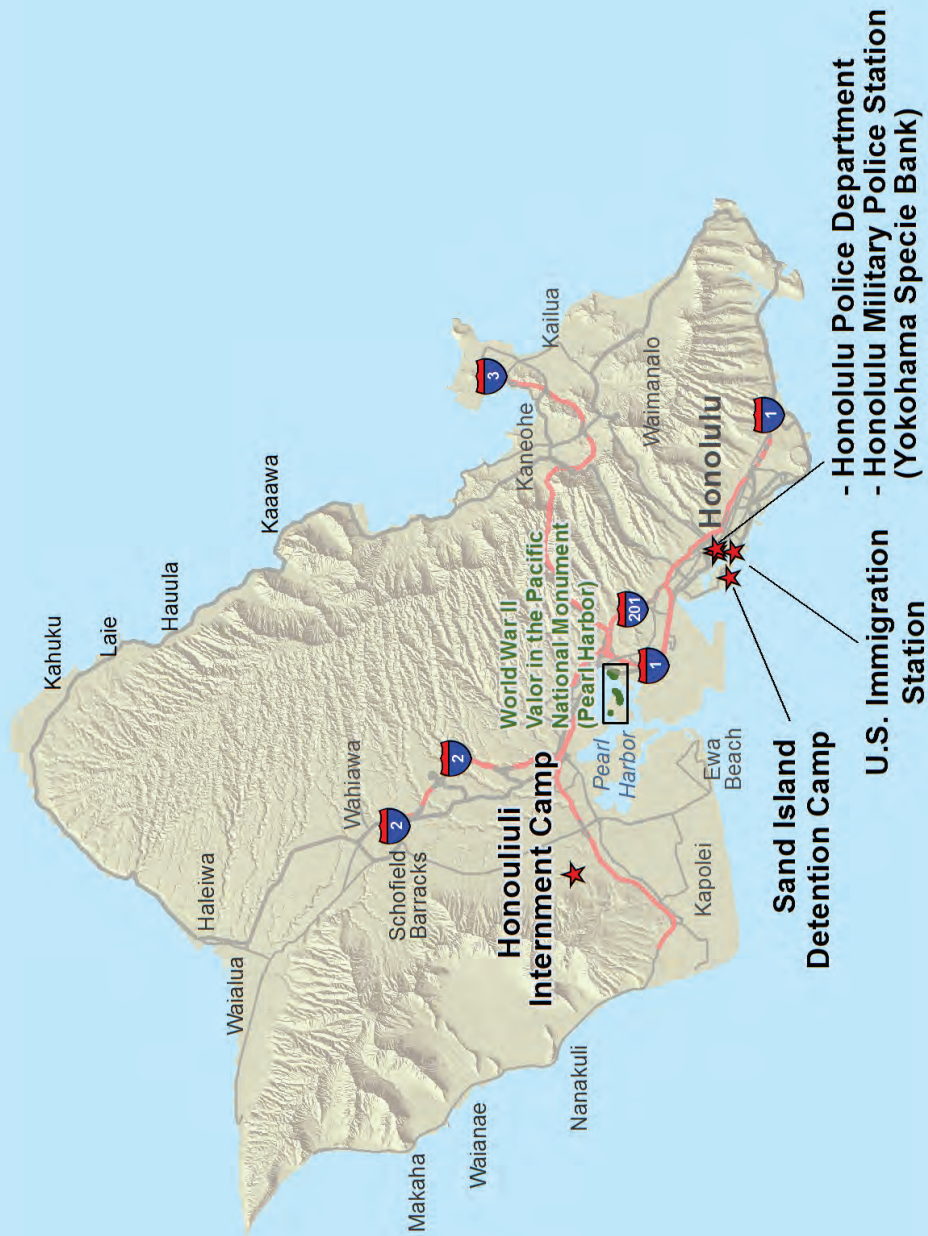
- Land use, current and potential site uses, ownership patterns, planning and zoning
- Access and public enjoyment potential
- Boundary size and configuration
- Existing resource degradation and threats to resources
- Public interest and support
- Social and economic impact
- Costs associated with operation, acquisition, development, and restoration



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



# O`ahu



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

Internment sites on the island of O`ahu during World War II.



The feasibility evaluation also considers the ability of the NPS to undertake new management responsibilities in light of current and projected availability of funding and personnel. An overall evaluation of feasibility is made after taking into account all of the above factors.

Some management options are more feasible than others. The national park system includes many types of sites, and a range of ownership and management approaches. The NPS also offers grant and technical assistance programs that help local communities achieve their goals for conservation and recreation.

The feasibility analysis focuses on the two sites that have been found nationally significant, Honouliuli Internment Camp and the U.S. Immigration Station.

The NPS finds that **Honouliuli Internment Camp** is feasible as an addition to the national park system as long as public access to the site can be secured. Current land use, ownership patterns, and zoning associated with Honouliuli Internment Camp would not conflict with management of a national park unit. Primary resources associated with the camp are located on property owned by the Monsanto Company, which has expressed interest

in donating the property to the NPS for establishment of a national park unit. Surrounding lands are currently in agricultural use which is compatible with the camp's historic setting. However, feasibility is conditional on securing public access to the site. As current access is primarily over unpaved agricultural roads, improvements would be needed to accommodate access by the general public. An appropriate boundary configuration would include the historic site and lands sufficient to provide site access and public staging facilities such as parking areas.

There are no current threats to Honouliuli Internment Camp that would preclude management as a unit of the national park system. Honouliuli Internment Camp contains resources with integrity sufficient for national historic landmark designation and NPS designation.

Outreach for this study has demonstrated significant public interest and support for an NPS park unit at Honouliuli Gulch in partnership with other organizations and local communities. The social and economic impacts of NPS designation or other support/coordination roles appear to be largely beneficial and would support the feasibility of NPS designation.



Japan America Society tour of Honouliuli in 2012. Photo: University of Hawai'i—West O'ahu Archeological Field School.



With operational support from World War II Valor in the Pacific National Monument at Pearl Harbor, operational costs for establishing a national park unit appear to be feasible. Land acquisition costs would be minimal and limited to the administrative costs associated with a land transfer to the National Park Service.

The NPS finds that the U.S. Immigration Station is not feasible as an addition to the national park system because of existing uses by the U.S. Department of Homeland Security and the State of Hawai'i, Department of Public Health. If the facilities were no longer needed by federal or state agencies, additional analysis would be needed to determine the feasibility of management options and associated costs. Given the U.S. Immigration Station's prominent location in downtown Honolulu, interpretive features located near the sidewalk and bus stop on Ala Moana Boulevard could provide information about this site's historical significance.

## NEED FOR NPS MANAGEMENT

The need for direct NPS management is the final criterion for evaluating resources for potential designation as a new unit of the national park system. The criterion requires a finding that NPS management would be superior to alternative management arrangements by other entities.

Evaluation of the need for NPS management pertains to those resources that are determined to be nationally significant, suitable, and feasible for inclusion in the national park system. Based on these findings the need for NPS management focuses on Honouliuli Internment Camp. Associated sites would continue to be owned and operated by nonprofit organizations, private property owners, and other government agencies.

The owner of the Honouliuli site, the Monsanto Company, has expressed interest in donating the site to the United States for its long-term preservation. Other organizations have not been identified that would be willing to take on direct ownership and management of the site for public use, or to which the Monsanto Company would be willing to transfer the site. NPS planning and research capabilities, as well as historic preservation, cultural resource management, and interpretive and educational programming expertise would offer superior opportunities for the site to be preserved and interpreted.

NPS partnerships with organizations and private property owners of the associated sites would provide enhanced opportunities for interpretation and coordinated site management. Development and cooperative management of interpretive programs and comprehensive visitor services with the NPS would be beneficial.

The NPS finds that there is a need for NPS management in partnership with others to fully protect resources and to enhance visitor appreciation of the nationally significant

resources and important stories associated with the Honouliuli Internment Camp. The incorporation of Honouliuli Internment Camp into the national park system would offer a visitor experience that allows the broadest understanding of the resources and stories relating to the internment of Japanese Americans and European Americans in Hawai'i during World War II.



Photos (top to bottom): **1.** Collapsed roof in extant World War II-era structure, Honouliuli Internment Camp, July 2010. Photo: Valentino Valdez. **2.** 2011 Day of Remembrance Pilgrimage to Honouliuli Internment Camp. Photo: Brian Niiya, Japanese Cultural Center of Hawai'i. **3.** Extant WWII-era rock wall at Honouliuli Internment Camp. Photo: Jeffery Burton.



# ALTERNATIVES

The following section describes a range of management alternatives that are being considered by the National Park Service as part of the special resource study.

## OVERVIEW OF THE ALTERNATIVES

The study team developed two alternatives based on information gathered from public and stakeholder input, internal NPS discussions, evaluation of special resource study criteria, historical research, and NPS management models. The two alternatives considered are a “no action” alternative, which serves as a baseline for comparison, and an “action” alternative, which is also the preferred alternative.

- **Alternative A:** Continuation of Current Management (No Action)
- **Alternative B:** Honouliuli National Historic Site or Monument—A Unit of the National Park System

For each alternative there is a description of the overall concept and key elements of the alternative, including management approaches, resource protection, visitor services, and the role of organizations and public agencies.

## ALTERNATIVE A: CONTINUATION OF CURRENT MANAGEMENT (NO ACTION ALTERNATIVE)

### Concept

Sites, organizations, and programs significant to the internment history in Hawai‘i would continue to operate independently by existing landowners, agencies, or organizations without additional NPS management or assistance other than what is currently available through existing authorities and grant programs.

### Management of Sites Related to Internment

Sites related to World War II internment in Hawai‘i would continue to be managed separately by their public and private landowners. With the exception of Kilauea Military Camp at Hawai‘i Volcanoes National Park, there would be no NPS staffing or operational support at sites identified in the study other than technical assistance under existing authorities if requested. Organizations and programs devoted to commemorating and preserving Hawai‘i’s internment history would continue to operate independently without NPS management or assistance other than that available through existing authorities. Table



Students in a summer archeology course at the University of Hawai‘i—West O‘ahu conduct fieldwork at Honouliuli. Photo: Valentino Valdez.



1: Existing Management of Sites Evaluated in the Study includes a summary of current management and visitor opportunities for each of the sites evaluated in the study.

### HONOULIULI INTERNMENT CAMP

Under the no action alternative, Honouliuli Internment Camp would remain in private ownership and would continue to be inaccessible to the general public. Interest by the existing landowner, public agencies, educational institutions, nonprofit organizations, and individuals may result in additional opportunities to interpret the site.

Although the site would not be managed expressly to provide visitor opportunities, existing landowners may continue to allow the Japanese Cultural Center of Hawai'i's (JCCH's) site tours and educational activities on occasion when permission is expressly granted by the landowner. The University of Hawai'i—West O'ahu (UHWO) would continue to conduct field schools at Honouliuli Internment Camp, as allowed by the current landowner.

### OTHER ASSOCIATED SITES

Sites identified as potentially eligible for national historic landmark (NHL) nomination or nomination to the National Register of Historic Places (NRHP) would continue to be owned by various public and private entities. These sites would continue to function for private and public uses, most of which are not related to World War II internment history. Interpretation and conservation of such sites would be uncoordinated and at the discretion of the current landowner. Partner organizations and agencies would take the lead in developing interpretation and education materials and visitor opportunities. Such opportunities would occur at locations such as the JCCH.

### Resource Protection

The primary responsibility for preserving nationally significant and associated sites would fall to the current owners and managers of those sites. Resource protection would be voluntary and dependent upon property owners' initiative. Sites in federal ownership would be managed in compliance with the National Historic Preservation Act (U.S. Immigration Station, Kilauea Military Camp). Sites not in federal ownership and currently listed in the National Register of Historic Places, such as the Honolulu Police Department, Yokohama Specie Bank, Kaua'i County Courthouse, and Maui County Courthouse and Police Station, would have some opportunities for technical assistance and grants for preservation.

For sites not listed in the NRHP nor protected by local preservation ordinances, any efforts for preservation would be at the discretion of existing landowners. Resources could suffer from a loss of integrity due to

changes in use or ownership in accordance with local planning and zoning ordinances over time. Existing owners may also lack funding to maintain or preserve sites.

### Visitor Experience

Organizations that provide visitor opportunities to learn about the internment history could continue to provide such opportunities. The JCCH could continue to provide visitor opportunities at the annual pilgrimage to Honouliuli, if the property owner was willing. Hawai'i Volcanoes National Park could provide interpretation at Kilauea Military Camp in coordination with the U.S. Army. World War II Valor in the Pacific National Monument at Pearl Harbor would continue to interpret the internment experience in Hawai'i as one component of the larger Pacific War story that it is mandated to convey.

Most other associated sites identified as significant to internment in Hawai'i are not managed expressly to provide visitor opportunities to learn about or experience these sites.



Photos (top to bottom): **1.** Kaunakakai County Courthouse on Molokai is in public ownership but was moved offsite in the years following its use as a temporary detention center for Molokai residents of Japanese heritage. Photo: NPS, 2011. **2.** The historic cannery building, Haiku, Maui, is in private ownership. Internees were held at Haiku Camp, although the precise dates of its use and the number of individuals incarcerated are unknown. Photo: Burton and Farrell 2007.



<b>Table 1: Existing Management of Sites Evaluated in the Study</b>			
<i>Site</i>	<i>Site Type and Location</i>	<i>Ownership and Management</i>	<i>Current Visitor Opportunities or Interpretation</i>
<b>Nationally Significant Sites</b>			
Honouliuli Internment Camp	Primary, O'ahu	Private	Currently not accessible to the general public. Site tours and use for educational purposes occur on occasion with landowner permission.
U.S. Immigration Station	Primary, O'ahu	Public, Department of Homeland Security and Hawai'i Department of Public Health	None. Currently not accessible to the general public.
<b>Sites Listed or Potentially Eligible for Listing in the National Register of Historic Places</b>			
Honolulu Police Department	Secondary, O'ahu	Public, City and County of Honolulu	None
Kaua'i County Courthouse	Secondary, Kaua'i	Public, County of Kaua'i	None
Kilauea Military Camp	Primary, Island of Hawai'i	Public, National Park Service	Active military recreation camp. However, opportunities for interpretation exist.
Maui County Jail, Courthouse, and Police Station	Primary, Maui	Public, Maui County	None
Yokohama Specie Bank	Secondary, O'ahu	Private	None
Lāna'i City Jail and Courthouse	Secondary, Lāna'i	Private	None
<b>Potentially Significant Sites—Additional Research Needed</b>			
Waiakea Prison Camp	Secondary, Island of Hawai'i	Exact Location Unknown	None
Hilo Independent Japanese Language School	Secondary, Island of Hawai'i	Unknown	None
Lihue Plantation Gymnasium	Secondary, Kaua'i	Privately owned structure adjacent to Isenberg Park	None
Kalaheo Stockade	Primary, Kaua'i	Private	None
Haiku Military Camp	Secondary, Maui	Private	None
<b>Other Related Sites—No Integrity Remaining</b>			
Sand Island Detention Camp	O'ahu	Public, State of Hawai'i	None/Non-Extant
Wailua Jail	Kaua'i	Public	None/Non-Extant
Waimea Jail	Kaua'i	Public	None/Non-Extant
Kaunakakai Jail and Courthouse	Molokai	Public	None/Non-Extant
<p>“Primary” sites are those that housed at least 10 prisoners, generally for more than several weeks. “Secondary” sites are those that were used as prisons for fewer prisoners, usually for shorter periods of time. Also included in the “secondary” category are sites where no internees were imprisoned, but where activities related to the internment occurred, such as hearings.</p> <p>Note: The Honolulu Police Department was inadvertently omitted from the printed versions of this table in the newsletter and draft report.</p>			



## Japanese American Confinement Sites (JACS) Grant Program

Honouliuli Internment Camp and other associated sites would continue to be eligible for grants through the Japanese American Confinement Sites ((JACS) Grant Program. Public Law a109-441 (16 USC 461) established the JACS Grant Program for the preservation and interpretation of U.S. confinement sites where Japanese Americans were incarcerated during World War II. The law authorized up to \$38 million for the life of the grant program to identify, research, evaluate, interpret, protect, restore, repair, and acquire historic confinement sites in order that present and future generations may learn and gain inspiration from these sites and that these sites will demonstrate the nation's commitment to equal justice under the law.

Grants are awarded to organizations and entities working to preserve historic Japanese American confinement sites and their history, including private nonprofit organizations; educational institutions; state, local, and tribal governments; and other public entities. Grants are awarded through a competitive process and require a two-to-one federal to non-federal match (\$2 federal to \$1 non-federal match). The JACS program has awarded approximately \$12.4 million in grants as of fiscal year 2013.

To date, JCCH has received five grants totaling \$375,700. Projects funded include a documentary film, educational tours, a youth program, traveling exhibits, and multimedia virtual tours. The University of Hawai'i has received four grants to date, totaling \$168,700. Projects funded include collection of oral histories, archival research, and archeological field schools. Under the no action alternative, organizations would continue to obtain assistance from the JACs Grant Program.

### Operations

Operation and maintenance of existing sites would be assumed to remain at existing levels. With the exception of Kilauea Military Camp at Hawai'i Volcanoes National Park, there would be no NPS staffing or operational responsibilities at the other nationally significant or potential NHL or NRHP sites associated with internment in Hawai'i.

Photos (top to bottom): **1.** Kilauea Military Detention Camp. Drawing by George Hoshida, 1942. Courtesy of the Japanese American National Museum; gift of June Hoshida Honma, Sandra Hoshida, and Carole Hoshida Kanada. **2.** Building 34 at Kilauea Military Camp, 2010. Based on primary source evidence from George Hoshida, this structure likely served as the internee barrack. Photo: NPS. **3.** Wailua County Jail, Kaua'i, during WWII, possibly with internee housing in the background. Photo: Lt. James Daniels, courtesy Kaua'i Museum Archives. **4.** Kaua'i Community Correctional Center, site of Wailua County Jail, 2006. Photo: Burton and Farrell 2007.





## ALTERNATIVE B: HONOULIULI NATIONAL HISTORIC SITE OR NATIONAL MONUMENT—A NEW UNIT OF THE NATIONAL PARK SYSTEM

### Concept

Congress would establish Honouliuli National Historic Site as a new unit of the national park system. Alternatively, a national monument managed by the National Park Service could be established. The national historic site or national monument would include the historic site of the Honouliuli Internment Camp and adjacent lands that provide road access and opportunities for visitor facilities. The National Park Service would preserve the site and interpret the internment of Japanese Americans and European Americans in Hawai'i during World War II. The national historic site or monument would be supported by operational capacity at World War II Valor in the Pacific National Monument, Pearl Harbor. The National Park Service could provide technical assistance for the preservation and interpretation of other sites, features, and stories related to internment in Hawai'i during World War II.

### Proposed Area

The Honouliuli National Historic Site or National Monument would total approximately 440 acres. The historic Honouliuli Internment Camp and the adjacent overlook parcel (approximately 123 acres) would be acquired by the NPS through a donation by the Monsanto Company. Additional Monsanto-owned lands (31 acres) with related resources would be protected through conservation easements or land acquisition. Adjacent parcels (285 acres), owned by the University of Hawai'i, would also be included in the boundary of the historic site to provide flexibility in establishing public access to the site (NPS can only expend funds on roads within an authorized boundary unless congressional legislation authorizes the use of funding for road maintenance on non-federally owned lands). Options for the University of Hawai'i parcels could include the University of Hawai'i maintaining ownership of the property, granting an easement to the NPS, or transferring ownership to the NPS by donation, exchange, or sale. Conservation easements could also be obtained for parcels directly adjacent to Honouliuli Internment Camp. Future development of road Easement 6134 could also provide opportunities for site access. All private property rights would be respected.

Several parcels owned by the City and County of Honolulu Board of Water Supply would be inholdings within the proposed area and would remain under current ownership and management. The communications site would not be included in the proposed boundary.

### Management

The NPS would have direct management responsibility for the Honouliuli National Historic Site or National Monument including: 1) interpretation and education associated with the Honouliuli Internment Camp and its resources, including the development of interpretive media and programs; 2) resource management for the historic site; and 3) operational facilities and infrastructure such as roads, restrooms, and trails.

### Resource Protection

NPS staff would protect and preserve the resources and setting of Honouliuli Internment Camp. Management plans would guide appropriate historic preservation documentation and treatments. The NPS would seek partnership opportunities with existing organizations that have conducted research and documentation of the site. These include the Japanese Cultural Center of Hawai'i, which maintains the largest repository of archives and collection items related to Honouliuli and the internment in Hawai'i, and the University of Hawai'i—West O'ahu, whose faculty and students have been actively involved in researching the history of the site and conducting archeological field schools at Honouliuli.

### Visitor Experience

Visitors would have the opportunity to learn about Honouliuli Internment Camp, World War II internment in Hawai'i, martial law, civil liberties, and peace and reconciliation through a wide variety of interpretive and educational programs onsite and at offsite locations. Interpretation would be accessible and relevant to diverse audiences and multiple generations. Virtual visitor experiences would be explored so that people could learn about and experience Honouliuli and related sites without actually visiting the sites. Programs could be provided by NPS rangers, partners, and volunteers. Information could be presented in multiple languages.

### Partnerships

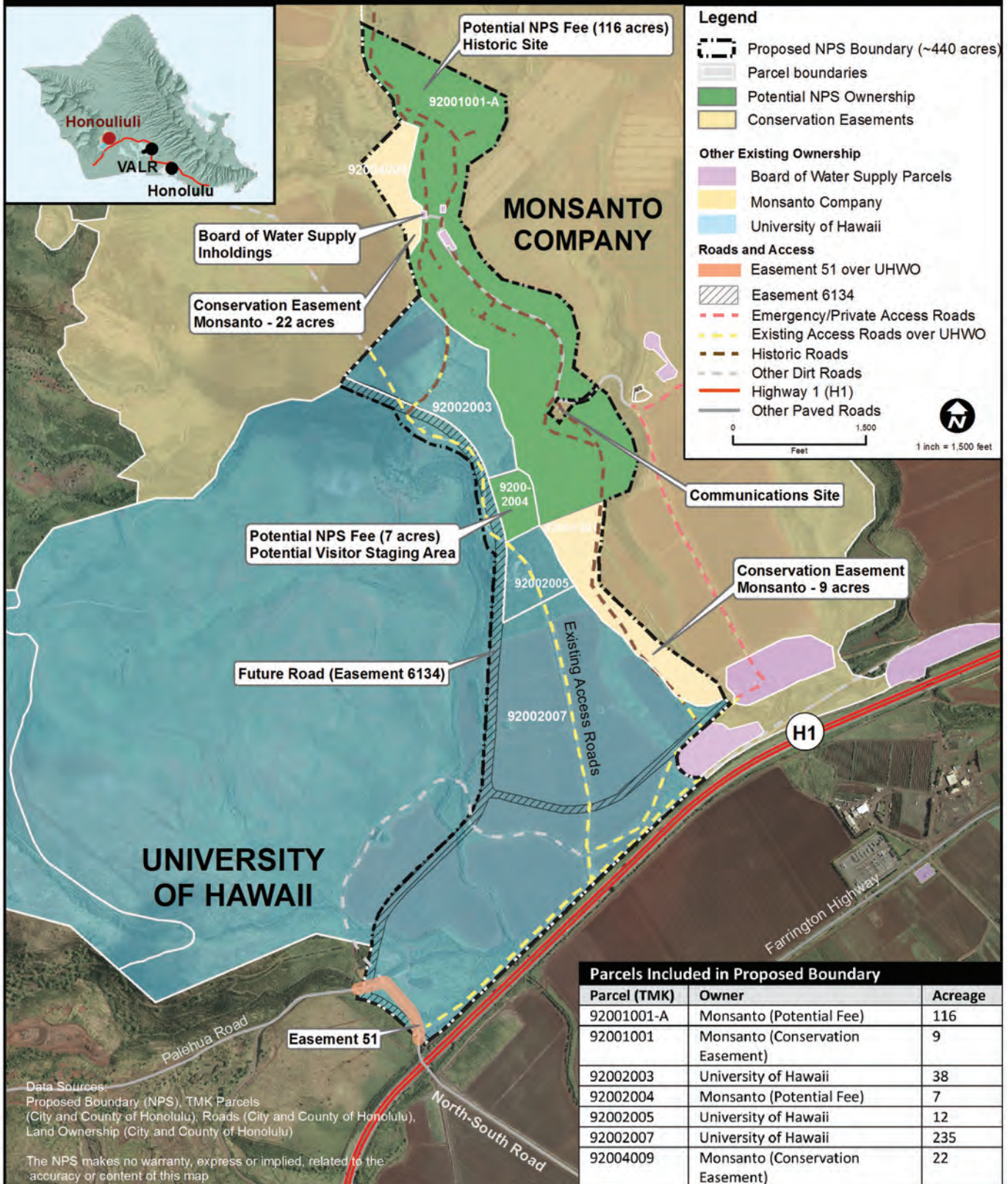
The NPS would explore, develop, and maintain partnerships for the preservation and interpretation of Honouliuli Internment Camp and related sites, features, and stories in Hawai'i.

There are substantial opportunities for partnerships related to Honouliuli National Historic Site or Monument with public agencies, educational institutions, nonprofit entities, and individuals. Potential partnership projects could include the development of educational programs, development of facilities, resource stewardship activities such as preservation of historic features and vegetation clearing, and research projects. Partnerships could also include shared facilities for interpretation, curatorial



# Honouliuli Gulch and Associated Sites Draft Special Resource Study

## Alternative B: Proposed Boundary, Honouliuli National Historic Site or Monument



National Park Service  
 Produced by the Pacific West Regional Office  
 San Francisco, CA

March 10, 2014



storage, operations, and maintenance. Possible partners include but are not limited to the University of Hawai‘i—West O‘ahu and the Japanese Cultural Center of Hawai‘i.

## Technical Assistance

Internment sites in Hawai‘i other than Honouliuli Internment Camp would continue to be owned and managed by their respective public and private owners. The associated sites illustrate the broad-reaching effects of internment on the six major islands in Hawai‘i and are essential in accurately interpreting this history.

The NPS could work cooperatively with associated site owners and managers to explore opportunities for interpretation and/or preservation of the associated sites. For example, the U.S. Immigration Station played a central role in the internment process. Almost every person interned passed through the U.S. Immigration Station either for initial detention, processing for transfer to internment camps on O‘ahu and the mainland, or for hearings and trials. The NPS could contribute to further

evaluation of the U.S. Immigration Station as a national historic landmark and explore opportunities to interpret its significance through waysides and exhibits.

Where appropriate, the NPS could also conduct research and provide assistance to related sites that have yet to be identified.

## Operations

### STAFFING

Management of Honouliuli National Historic Site or Monument would be through World War II Valor in the Pacific National Monument at Pearl Harbor, given its close proximity and related history. Some staff positions at World War II Valor in the Pacific National Monument would be shared. However, management of the site would require additional staff as funding became available. A management plan would identify priorities, management emphases, and required staffing for a 15- to 20-year timeframe.

Based on comparisons of staffing levels for existing national historic sites of similar scale and management models, the following types of staff would be recommended:

- Site manager
- Cultural resource specialist
- Interpretive specialist
- Interpretive ranger (2)
- Law enforcement ranger
- Maintenance (2)
- Exotic plant management technician

Positions could be permanent, temporary, or seasonal. In addition, partner organizations could provide staff or volunteers, with types and numbers dependent upon the functions provided.

### OPERATIONAL AND VISITOR FACILITIES

Comprehensive management planning would guide the development of facilities for Honouliuli National Historic Site or National Monument. Facilities would be needed to support public access, circulation, orientation, and learning about the history of internment in Hawai‘i. The 7-acre overlook site could serve as an excellent location for a visitor staging area with ample space to provide for parking, visitor drop-off, interpretive features, and restrooms. The site is located just outside of the historic camp and offers views to Pearl Harbor, downtown Honolulu, and Diamond Head. Within the gulch, visitor facilities would be minimal to preserve the site’s historic integrity. Facilities might include trails, interpretive waysides, primitive roads, and vault toilets.



Photos (top to bottom): 1. Entry, former administration building, U.S. Immigration Station. 2. View to Pearl Harbor from overlook, Honouliuli. Photos: NPS, 2013.



Public access to Honouliuli Internment Camp does not currently exist because it is located on private property. Rights of access would be required to provide public access to the 7-acre parcel and historic site. Existing roads would require considerable improvement to accommodate visitor access.

The Federal Highway Administration (FHA) estimated construction costs for public and administrative access using existing road alignments would range from \$3 to 20 million. This dollar amount would also include parking and turnaround areas for buses. The higher end of the range would be incurred if additional reconstruction or realignment is necessary for road improvements. Costs would need to be reevaluated after a formal site survey and through completion of a comprehensive management plan.

Shuttle or bus service from either World War II Valor in the Pacific National Monument or UHWO was also evaluated by the FHA. Costs to operate a bus connection from World War II Valor in the Pacific National Monument three times per week were estimated at \$25,000 to \$30,000 annually. Costs to operate a bus or shuttle from University of Hawai'i—West O'ahu twice daily were estimated at \$91,000 to \$112,000 annually.

NPS management of a national historic site at Honouliuli Gulch would be funded through federal appropriations as part of the annual NPS budget and through potential partners and grants. The national historic site or monument could share administrative, visitor, and operational facilities with World War II Valor in the Pacific National Monument or partner entities. Non-federal entities would continue to be eligible for the grants through the Japanese American Confinement Sites Grant Program for preservation, interpretation, and documentation projects associated with Honouliuli Internment Camp.

Based on the size and scope of this site, and the types of services and assistance proposed, the annual cost of NPS operations for the national historic site could be expected to be \$400,000 to \$750,000. The estimated operational budget would primarily fund NPS staff, programs, projects, and outreach.

Specific costs would be reevaluated in subsequent, more detailed planning for the unit. Planning would consider facility design, detailed identification of resource protection needs, and changing visitor expectations. Actual costs to the NPS would vary depending on timing and implementation and contributions by partners and volunteers. It is assumed that meeting the long-range financial needs of Honouliuli National Historic Site or Monument would not just rely upon federally appropriated funds. A variety of other public and private funding sources could be sought by the NPS to assist in

implementation efforts. Other NPS units have successfully found partners to help with funding major projects, and some of the costs associated with actions in the alternatives may prove to be less expensive when donated materials, labor, and other support are forthcoming.

## Environmental Assessment

### BACKGROUND

Before taking an action, the National Environmental Policy Act (NEPA) requires federal agencies to identify a range of alternatives for that action and to analyze the potential environmental impacts of that action, including any potential adverse environmental effects that cannot be avoided if the proposed action is implemented. The NPS prepared an environmental assessment (EA) for the Honouliuli Gulch and Associated Sites Special Resource Study to identify and analyze the potential environmental and socioeconomic consequences of each of the alternatives considered in the study.

### IMPACTS

Consequences are determined by comparing likely future conditions under each alternative with the existing baseline conditions as described in the “no action”



A Chinese banyan tree illustrates the extent of vegetation overgrowth in Honouliuli Gulch. Photo: NPS, 2011.



alternative. The analysis includes consideration of the context, intensity, and duration of direct and indirect effects of all the alternatives.

The NPS based analysis and conclusions on a review of existing literature, information provided by experts within the NPS as well as outside organizations, analysis of case studies of existing programs in other locations, and the professional judgment of the team members. The findings of this study will inform a recommendation by the Secretary of the Interior to Congress. If Congress takes action, then new environmental analysis would be undertaken prior to implementation actions. This new analysis would propose specific actions whose specific impacts would be assessed prior to implementation.

The NPS evaluated the environmental consequences of each alternative on the following topics: land use, water resources, vegetation, prehistoric and historic archeological resources, historic structures / cultural landscapes, museum collections, visitor experience, and socioeconomics.

The NPS finds that there would be no significant impacts associated with the proposed alternatives.

## ENVIRONMENTALLY PREFERRED ALTERNATIVE

The NPS is required to identify an “environmentally preferred alternative” in an EA. The environmentally preferable alternative is determined by applying the criteria suggested in the National Environmental Policy Act (NEPA) of 1969 and is further guided by the Council on Environmental Quality (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;



Aerial view of Honouliuli Gulch looking south, showing both Monsanto lands (left) and University of Hawai'i—West O'ahu lands (right). Board of Water Supply facilities are visible in the foreground. Photo: Monsanto Company.



- 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 nationally significant resources, including opportunities for protecting the Honouliuli site in perpetuity should the Monsanto

Company donate it to the NPS, meeting criterion 1 above. Alternative B would also best meet the intent embodied in criteria 2, 3, and 4, through providing opportunities for protection of the historic Honouliuli Internment Camp 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.

The analysis and findings contained in this study do not guarantee the future funding, support, or any subsequent action by the NPS, the Department of the Interior, or Congress. Identification of an environmentally preferred alternative should not be viewed as a positive or negative recommendation by the NPS for any future management strategy or action.



Photo of the Honouliuli Internment Camp, c. 1945, by R. H. Lodge. Courtesy of Hawai'i's Plantation Village.

## YOU'RE INVITED TO A PUBLIC MEETING!

*Please join us for a public meeting to share your comments relating to this draft special resource study and environmental assessment. We look forward to seeing and hearing from you!*

Tuesday, May 27, 2–4 pm

### **KAPOLEI, O'AHU**

Lab Building E132, University of Hawai'i—West O'ahu  
91–1001 Farrington Highway

Wednesday, May 28, 6–8 pm

Thursday, May 29, 10 am–noon

### **HONOLULU, O'AHU**

Japanese Cultural Center of Hawai'i  
2454 S Beretania Street, #101

Thursday, May 29, 6:30–8:30 pm

### **LĪHU'E, KAUAI**

Līhu'e Neighborhood Center  
3353 Eono Street

Monday, June 2, 10 am–noon

### **KAUNAKAKAI, MOLOKAI**

Kaunakakai Elementary School Cafeteria  
Ailoa Street

Monday, June 2, 6–8 pm

### **KAHULUI, MAUI**

Alexa Higashi Room, Maui Arts and Cultural Center  
One Cameron Way

Tuesday, June 3, 2–4 pm

### **LĀNA'I CITY, LĀNA'I**

The Lāna'i Senior Center  
309 Seventh Street

Wednesday, June 4, 6–8 pm

### **HILO, ISLAND OF HAWAI'I**

Hawai'i Japanese Center  
751 Kanoiehua Avenue

Tuesday, June 17, 10 am–noon (Hawai'i Time),  
1–3 pm (Pacific Time), 4–6 pm (Eastern Time)

### **VIRTUAL MEETING**

Virtual meeting web access information will be posted at [www.nps.gov/pwro/honouliuli](http://www.nps.gov/pwro/honouliuli)



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soy-based inks.



## HOW TO PROVIDE COMMENTS

*This draft study report is available for public review and comment until July 15, 2014. We welcome your thoughts through email, our website, mail, or at one of the public meetings that we are hosting. Your comments will help us revise and finalize this report and will inform the recommendation that is made to Congress as part of this report. Thank you for your thoughtful feedback.*

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Seattle, WA 98104

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(808) 541-2693

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Detail, 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.