


WALTER RITTE



June 8, 2015

General Management Plan
Attn: Erika Stein Espaniola, Superintendent
Kalaupapa National Historical Park
P.O. Box 2222
Kalaupapa, Hawaii, 96742

RE: Comments on the Draft General Management Plan /Environmental Impact Statement for the Kalaupapa National Historical Park

Aloha Superintendent Espaniola:

Pursuant to the National Historic Preservation Act (“NHPA”) ¹, The National Environmental Policy Act (“NEPA”) ², and the Hawai‘i Environmental Policy Act (“HEPA”) ³, this letter comments on the Draft General Management Plan/Environmental Impact Statement (“Draft GMP/EIS”) ⁴ for Kalaupapa National Historic Park (“Kalaupapa NHP”). These comments are on behalf of Hui Ho‘opakele ‘Āina (“Hui”), a hui of Molokai community members who are committed to preserving and protecting the cultural and environmental resources of Molokai.

“It is good for people to remember who were there before us.”
- Peter Keola Jr., 82, who was sent to Kalaupapa in 1940⁵

The patients who were sent to the Kalaupapa peninsula because of government policies regarding Hansen’s disease “deserve to be remembered.”⁶ Theirs is a story of courage, perseverance, and ultimate sacrifice. However, it is not the only story. Generations of Hawaiian families called Kalaupapa their home more than 800 years before the first Hansen’s disease

¹ 300 C.F.R. 800.2(d)(2).

² 40 C.F.R. 1503.1(a)(4).

³ 11 H.R.S. 11-200-91.

⁴ DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT, KALAUPAPA NATIONAL HISTORIC PARK (2015) (“GMP/EIS”).

⁵ THE KALAUPAPA MEMORIAL, KA ‘OHANA O KALAUPAPA, <http://www.kalaupapaohana.org/monument.html> (last visited May 28, 2015).

⁶ See *id.*, quoting Cathrine Puahala, 80, international advocate for the rights of people affected by leprosy; Mrs. Puahala was sent to Kalaupapa at the age of 12 in 19420.

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patient was cast into the sea and forced to take refuge upon its shores in 1866.⁷ “The peninsula and the adjacent valleys supported a large population” and was well known for its abundant crops, fishing grounds, salt deposits, and unique plants.⁸ Archaeological evidence tells us that Kalaupapa served as a “garden paradise” to Hawaiians, and “wall after wall after wall” of agricultural gardens still remain as evidence.⁹ Molokai was then known as an island of ‘āina momona,¹⁰ producing enough surplus food to feed neighboring islands. Today, Kalaupapa is an “alien landscape . . . with alien plants,” but beneath this alien landscape lays the rich cultural landscape created by Hawaiians.¹¹ Theirs is also a story that deserves to be remembered. As the last chapter in the story of Kalaupapa as a haven for Hansen’s disease patients draws to an end, a new story must inevitably begin. This story should continue with Hawaiians cultivating the land and returning it to its former abundance as a place of ‘āina momona.¹² Molokai should once again become a land of plenty, enabling Hawai‘i to enjoy long-term environmental sustainability, self-sufficiency and food sovereignty in the future.¹³

The National Park Service (“NPS”) released the Draft GMP/EIS in April 2015 for public comment in accordance with the NHPA Section 106 Process.¹⁴ Four potential plans (A, B, C, and D) are presented in the Draft GMP/EIS.¹⁵ This comment letter will primarily address the impacts of the Draft GMP/EIS’s preferred Plan C (“Plan C”).

Hui Ho‘opakele ‘Āina agrees with the overall purpose of the GMP to care for the Kalaupapa Settlement area, to remember the Hansen’s disease patients, and to preserve and respect the legacy of the patients and those who cared for them. The Hui, however, strongly opposes any boundary expansion (hereinafter, called the “Expansion”) of parklands. Plan C’s expansion of the park’s boundaries calls for a 148% increase in Kalaupapa’s park acreage. These expansion plans should be completely severed from the GMP/EIS. All comments and analysis are in light of this proposed boundary Expansion.

⁷ Videotape: Kalaupapa Archaeology (Clap Productions, Arizona Memorial Museum Association 1997) (on file with the Wong Audiovisual Center, University of Hawaii at Manoa) (“Kalaupapa Videotape”).

⁸ *See id.*

⁹ *See id.*, quoting Earl “Buddy” Neller, Archaeologist, Kalaupapa National Historical Park.

¹⁰ ‘Āina momona: literally “fat land”; an abundant land, or land of plenty; Molokai was known as the land of “fat fish and kukui nut relish,” Claire Gupta, *Food Sovereignty: A Critical Dialogue*, YALE UNIVERSITY AGRARIAN STUDIES, Sept. 14-15, 2013 at 5, http://www.yale.edu/agrarianstudies/foodsovereignty/pprs/70_Gupta_2013.pdf (last visited May 30, 2015).

¹¹ Kalaupapa Videotape, *supra* note 5.

¹² *See* GUPTA, *supra* note 10.

¹³ *See id.*

¹⁴ National Historic Preservation Act of 1966, 16 U.S.C. § 470 et seq.

¹⁵ DRAFT GMP/EIS, *supra* note 4 at 104.

For reasons detailed below, the Expansion is legally deficient under federal and Hawai‘i state laws; it neglects to follow federal and state laws that protect the interests of Native Hawaiian traditional and customary rights, as well as the rights of Molokai residents. The NPS should cultivate a real partnership relationship between the Department of Hawaiian Home Lands (“DHHL”) and the Office of Hawaiian Affairs (“OHA”) to develop a living, sustainable Integrated Resource Management Zone (“IRMZ”) where DHHL beneficiaries and other native Hawaiians may practice traditional and cultural farming and food production.

1. The Draft GMP/EIS is Legally Deficient Under Federal and Hawai‘i State Laws.

Over a hundred federal laws¹⁶ and Hawai‘i state laws are applicable to the NPS, and several are noteworthy and especially pertinent to the Draft GMP/EIS.

2. The Draft GMP/EIS Fails to Meet the Full Requirements under the National Environmental Policy Act and Hawai‘i Environmental Policy Act Requirements.

The National Environmental Policy Act (hereinafter, “NEPA”)¹⁷ established national environmental policy and goals for the protection, maintenance, and enhancement of the environment and provides a process for implementing these goals within the federal agencies.¹⁸

If the environmental consequences of a proposed federal undertaking may significantly affect the quality of the environment, an Environmental Impact Statement (“EIS”) must be prepared.¹⁹ The Draft GMP/EIS properly concludes that the Kalaupapa NHP triggers NEPA and should comply with NEPA requirements.

3. NPS Failed to Integrate HEPA in The NEPA Planning Process.

Federal agencies “shall integrate the NEPA process with other planning at the earliest possible time to ensure planning and decisions reflect environmental values, to avoid delays later in the process, and to head off potential conflicts.”²⁰ The NPS failed to integrate the Hawai‘i Environmental Policy Act (“HEPA”)²¹ process and requirements into its NEPA process.

The specific HEPA triggers involved here is a proposed action that involves (1) the use of state or county lands, (2) any use within any land classified as conservation district, (3) any use

¹⁶ DRAFT GMP/EIS, *supra* note 4: Appendix B 349-350.

¹⁷ National Environmental Policy Act, 42 U.S.C. §§ 4321 et seq. (2015).

¹⁸ National Environmental Policy Act, U.S. Environmental Protection Agency, <http://www.epa.gov/compliance/basics/nepa.html> (last visited May 30, 2015).

¹⁹ 40 C.F.R. § 1502.3.

²⁰ 40 C.F.R. § 1501.2.

²¹ Hawai‘i Environmental Policy Act, H.R.S. § 343.

within a shoreline area, and (4) any use within any historic site as designated in the national register or Hawaii register. The Draft GMP/EIS involves these triggers, the NPS must integrate HEPA in the NEPA planning process. When actions are subject to both NEPA and HEPA, then cooperation amongst the appropriate federal and state agencies is expected in order to comply with both HEPA and NEPA requirements under one document.”²²

Although HEPA was patterned after NEPA and its process and requirements substantially mirror those of NEPA, state law provides an additional requirement that is not present in NEPA. Namely, HEPA mandates submittal of a Cultural Impact Assessment (hereinafter, “CIA”) as part of the environmental review process.²³ The Hawai‘i Environmental Council promulgated Guidelines for Assessing Cultural Impacts (hereinafter “Cultural Guidelines”) as part of the environmental review process to promote “responsible decision making.”²⁴ These Cultural Guidelines provide a framework for agencies to ensure that their actions comport with the constitution, statutory laws, and court decisions that protect traditional and customary rights in Hawai‘i (hereinafter, “T&C Rights”).

T&C Rights are guaranteed under the Hawai‘i State Constitution (“Hawai‘i Constitution”), statutes, and court decisions. The Hawai‘i Constitution reaffirms T&C Rights in Article XII, Section 7:

The State reaffirms and shall protect all rights, customarily and traditionally exercised for subsistence, cultural and religious purposes and possessed by ahupua‘a tenants who are descendants of native Hawaiians who inhabited the Hawaiian Islands prior to 1778, subject to the right of the State to regulate such rights.

Hawai‘i Revised Statutes (“HRS”) section 1-1 instructs Hawai‘i’s courts to look to English and American common law decisions for guidance, except where they conflict with “Hawaiian judicial precedent, or . . . Hawaiian [custom and] usage” pre-dating 1892.²⁵ Courts look to kama‘āina expert testimony as the foundation for authenticating Hawaiian custom and usage.²⁶ HRS section 7-1 states:

²² H.R.S. § 343-5(h).

²³ 2000 Haw. Sess. Laws Act 50.

²⁴ Guide to the Implementation and Practice of the Hawai‘i Environmental Policy Act (2012), Office of Environmental Quality Control 2, http://oeqc.doh.hawaii.gov/Shared%20Documents/Misc_Documents/Guide%20to%20the%20Implementation%20and%20Practice%20of%20the%20HEPA.pdf (last visited June 1, 2015).

²⁵ H.R.S. § 1-1; *State v. Zimring*, 52 Haw. 472, 475 (1970) (citing *De Freitas v. Trustees of Campbell Estate*, 46 Haw. 425, 380 P.2d 762 (1963)).

²⁶ This was first discussed in *Application of Ashford* which relied on “reputation evidence” of a kama‘āina, native person who was most familiar with the land, over a shoreline boundary dispute rather than accept the conclusions of a certified land surveyor. *Application of Ashford*, 50 Haw. 314, 440 P.2d 76 (1968).

Where the landlords have obtained, or may hereafter obtain, allodial titles to their lands, the people on each of their lands shall not be deprived of the right to take firewood, house-timber, aho cord, thatch, or ki leaf, from the land on which they live, for their own private use, but they shall not have a right to take such articles to sell for profit. The people shall also have a right to drinking water, and running water, and the right of way. The springs of water, running water, and roads shall be free to all, on all lands granted in fee simple; provided that this shall not be applicable to wells and watercourses, which individuals have made for their own use.²⁷

Hawai‘i courts have clarified T&C Rights in light of the above constitutional and statutory provisions. The court has found that Hawaiian T&C rights are protected on undeveloped lands.²⁸ The court has acknowledged that traditions exercised on “less than fully developed” lands might also warrant protection.²⁹ Most, if not all, of the land of the proposed Expansion area are undeveloped or less than fully developed lands. Kama‘āina families access these lands for traditional subsistence activities and access to important cultural sites.

In *Pele Defense Fund v. Paty* (“Pele I”), the Hawai‘i Supreme Court held that T&C Rights to gather may extend to other ahupua‘a without benefit of tenancy if it can be demonstrated that this was the accepted custom and long-standing practice.³⁰ The court gave great weight to kama‘āina evidence and acknowledged “traditional and customary rights associated with tenancy in an ahupua‘a may extend beyond the boundaries of the ahupua‘a.”³¹ Similar to the testimony and affidavits submitted in Pele I, several kama‘āina in the Hui utilize the North Shore to gather hihiwai and ‘o‘opu, and to engage in fishing, hunting, and gathering.

In *Ka Pa‘akai* the court held that agencies have “statutory and constitutional obligations” to Native Hawaiians and one of those obligations is “to protect the reasonable exercise of customarily and traditionally exercised rights of Native Hawaiians to the extent feasible.” It also mandated that state agencies must make an independent assessment regarding the potential impact of proposed actions on T&C practices in order to meet constitutional and statutory obligations to Native Hawaiians.³² The three factors that agencies must consider when making these assessments are:

²⁷ H.R.S. § 7-1.

²⁸ *Kalipi v. Hawaiian Trust Co.*, 66 Haw 1, 9, 656 P.2d 745, 750 (1982).

²⁹ *Public Access Shoreline Hawaii v. Hawai‘i County Planning Commission*, 79 Hawai‘i 425, 451, 903 P.2d 1246, 1272.

³⁰ *Pele Defense Fund v. Paty*, 73 Haw. at 620-21, 837 P.2d at 1272.

³¹ *See id.*

³² *Ka Pa‘akai O Ka ‘Aina v. Land Use Commission*, 94 Hawai‘i 31, 7 P.3d 1068, 1083 (2000).

- “(A) The identity and scope of ‘valued cultural, historical, or natural resources’ in the petition area, including the extent to which traditional and customary native Hawaiian rights are exercised in the petition area;
- (B) The extent to which those resources—including traditional and customary native Hawaiian rights—will be affected or impaired by the proposed action; and
- (C) The feasible action, if any, to be taken ... by the [State and/or its political subdivisions] to reasonably protect native Hawaiian rights if they are found to exist.”³³

These factors, also known as the “Ka Pa‘akai framework,” are applicable to any State action affecting T&C Rights and practices, including those exercised by members of the Hui on the North Shore. Plan C fails to assess these factors in light of the Expansion. The NPS must coordinate with state agencies to complete a sufficient assessment.

In today’s modern society, access to traditional trail systems continues to be protected as a T&C Right. An implied dedication of a public right-of-way is established when there is intention and an act of dedication by the property owner, and an acceptance by the public.³⁴ The public trust doctrine also protects access along trails that run over government and private property. For trails that intersect with government property the State is required to establish rights-of-way across public lands to allow public access to beaches, game management areas, public hunting areas and forests. The Hawai‘i Constitution expands the public trust doctrine for Native Hawaiians in order to protect the exercise of their T&C Rights for subsistence, cultural and religious purposes. Members of the Hui have identified traditional trail systems that they have accessed for subsistence, cultural and religious purposes.

Plan C fails to acknowledge Native Hawaiians’ T&C Rights to gather resources, hunt, fish, and access traditional trail systems within the lands of the Expansion, and states that “[g]uidelines and/or a permit process have not yet been established for subsistence plant collecting or gathering plant materials for cultural use [v]isitors are prohibited from gathering plants within the park.”³⁵ Plan C states that the land “could be managed as a Preserve whereby traditional hunting, fishing, and collection would be allowed in accordance with State of Hawai‘i rules and regulations.”³⁶ However, following constitutional and statutory laws are not optional endeavors. The NPS must allow Hawaiians to exercise their T&C Rights to hunt, fish, gather, and access natural and cultural resources within the Kalaupapa NHP and the Expansion area.

³³ *See id.*

³⁴ *The King v. Cornwell*, 3 Haw. 154, 161 (1869).

³⁵ DRAFT GMP/EIS, *supra* note 4 at 82.

³⁶ *See id.* at xxiii.

The GMP/EIS’s failure to recognize T&C Rights of Hawaiians creates a potential risk of a future lawsuit if Native Hawaiians are denied their constitutional and statutory rights. The NPS and any state agencies that it partners with in the future should look to the state Cultural Guidelines to assess how Plan C and the Expansion in particular will impact T&C rights and practices.

4. Purpose and Need for the Expansion is Not Given.

The NPS is required to state the purpose and need for a proposed action in the EIS.³⁷ Although the Draft GMP/EIS states the purpose and need for a plan for the existing Kalaupapa NHP park boundaries, it does not state the purpose and need for the Expansion.

The Draft GMP/EIS states that the plan objectives are to: develop the purpose, significance, and interpretive themes; describe any special mandates; clearly define desired resource conditions and visitor uses and experiences; provide guidance for NPS managers; and ensure that the plan was developed in consultation with the public and interested stakeholders.³⁸ None of these adequately explain the purpose for the Expansion.

The Draft GMP/EIS states under the “Need for the Plan” section that the plan is necessary to guide the change in management direction once Kalaupapa has completed service to the last Hansen’s disease patients; cultural and natural resource management; future visitor use; issues regarding law enforcement jurisdiction; facilities preservation, maintenance, and construction; transportation and access; and future partnerships. None of these adequately explain the need for the Expansion.

The sub-section titled “Boundary Issues” under the “Need for the Plan” section states the need for future leases and cooperative agreements between the NPS, DHHL, Department of Land and Natural Resources (“DLNR”), Department of Health (“DOH”), Department of Transportation (“DOT”), and other religious and private entities.³⁹ Only one paragraph in this sub-section refers to the Expansion:

In 2000, the NPS completed a boundary study of the North Shore Cliffs on Molokai as a requirement of Public Law 105-355, entitled “Studies of potential national park system units in Hawai‘i” enacted on November 6, 1998. The study determined that the area met both suitability and feasibility standards for inclusion in the NPS system.⁴⁰

³⁷ 40 C.F.R. § 1502.13.

³⁸ DRAFT GMP/EIS, *supra* note 4 at 29.

³⁹ *See id* at 33.

⁴⁰ *See id* (emphasis added) (note added).

The Draft GMP/EIS also refers to two other studies pertinent to the Expansion: Kalaupapa Settlement Boundary Study Along the North Shore to Hālawā Valley, Molokai (“North Shore Study”) and the Study of Alternatives—Hālawā Valley, Molokai (“Hālawā Study”), both completed in 2000. The Draft GMP/EIS summarizes these studies:

Both studies surveyed and analyzed the area’s natural and cultural resources and determined that they are of national significance. It was determined that management by the NPS and designating these areas as part of the national park system would provide the most effective long-term protection of the area and provide the greatest opportunities for public use. The recommended areas would complement and enhance the Draft GMP/EIS’s legislated purpose “to research, preserve, and maintain important historic structures, traditional Hawaiian sites, cultural values, and natural features” (Public Law 95-565, Sec. 102).

The NPS’s purpose and needs for the plan appear to be: 1) the Expansion area meets suitability and feasibility standards for inclusion in the NPS system; 2) the Expansion area’s natural and cultural resources are of national significance; 3) NPS management will provide the most effective long-term protection; and 4) NPS management will provide the greatest opportunities for public use.

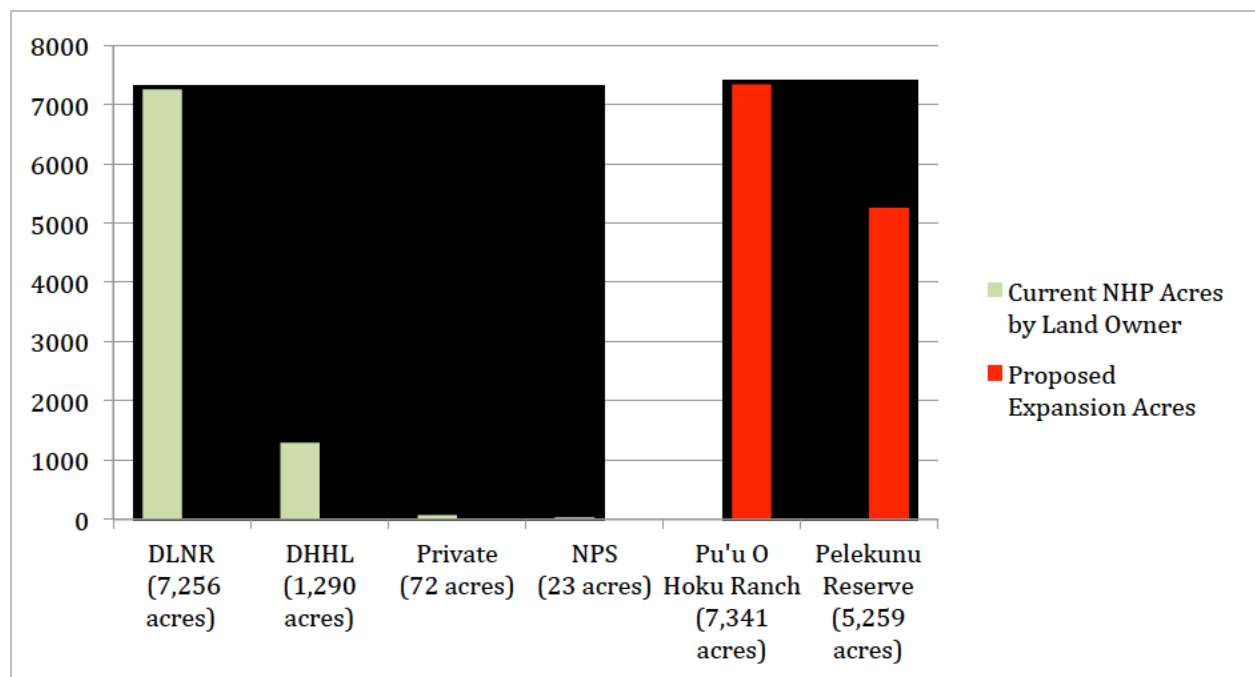
The purpose and needs are not sufficient to justify the Expansion. Just because an area meets suitability and feasibility standards for inclusion in the NPS system does not mean that the area must or should be included. Much of the undeveloped land in Hawai‘i would likely meet the suitability and feasibility standards for inclusion, but it would be impractical and absurd for the NPS to attempt to acquire all of the areas in Hawai‘i that do.

The Hālawā and North Shore studies correctly concluded that the Expansion area contains natural and cultural resources of national significance, but the Draft GMP/EIS fails to state whether the studies found any threat to those resources. Without providing any proof of a threat or immediate danger to the natural and cultural resources, the finding of cultural and natural resources in an area is not sufficient for the NPS to include that area in its jurisdiction. Much of the undeveloped land in Hawai‘i would likely be found to contain natural and cultural resources of national significance, but it would be impractical and absurd for the NPS to attempt to acquire all of the areas in Hawai‘i that do.

Plan C fails to state why NPS management would provide the most effective long-term protection. The Molokai community and members of the Hui have always worked diligently to protect not only the Expansion area, but also the entire island of Molokai from developers and government actions that would have caused damage to natural and cultural resources. The NPS’s conclusion that it would stand as a better protector of Molokai than the Molokai community and the Hui is offensive. The Molokai community has diligently and passionately guarded its island from destruction of its natural and cultural resources for generations. No one is better suited and qualified to mālama (care for) Molokai than the people of Molokai.

Much of the Expansion area is not currently open to public use, and there is no need for the public to have access to it. It is accessed by individuals exercising their T&C Rights and by Molokai residents who hunt, fish, and gather food for their families’ subsistence. Allowing public access to the Expansion area is counter-intuitive and would not provide sufficient protection of the natural and cultural resources.

The Expansion is over-reaching and unnecessary. The NPS can successfully fulfill its purpose and provide adequate protection and preservation to the existing Kalaupapa NHP without the Expansion. The Expansion would result in a 148% increase in the park’s boundaries, giving the NPS jurisdiction over a total of 21,635 acres. The NPS, however, owns merely 23 acres on Molokai, making it the smallest landowner of Kalaupapa NHP by far.



The Expansion is a remarkably over-reaching land-grab in light of the upcoming end of NPS’s lease and the NPS’s dwarfed landownership share.

None of the above purposes and needs stated in the Draft GMP/EIS sufficiently justify the Expansion. The NPS should make the findings of both the Hālawā and the North Shore Studies available to the public for comment and consultation. The Draft GMP/EIS’s failure to state a sufficient purpose and need for the Expansion constitutes a violation of NEPA.

5. Environmental Justice was Improperly Ruled Out as an Impact Topic.

Executive Order 12898 (“EO”) directs each Federal Agency to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations,” including native

populations.⁴¹ The accompanying Presidential Memorandum (“Memo”) emphasizes the importance of using the NEPA review processes to promote environmental justice.⁴² The Memo directs federal agencies to analyze the environmental effects, including human health, economic, and social effects, of their proposed actions on minority and low-income communities when NEPA requires an EIS to be completed. Environmental justice issues may arise at any step of the NEPA process and agencies should consider these issues at each and every step of the process.⁴³

In light of Executive Order 12898, the Council on Environmental Quality issued guidelines requiring federal agencies to consider six factors to determine any disproportionately high and adverse human health or environmental effects to low-income, minority, and tribal populations. The principles are: (1) consider the composition of the affected area to determine whether low-income, minority or Tribal populations are present and whether there may be disproportionately high and adverse human health or environmental effects on these populations; (2) consider relevant public health and industry data concerning the potential for multiple exposures or cumulative exposure to human health or environmental hazards in the affected population, as well as historical patterns of exposure to environmental hazards; (3) recognize the interrelated cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the proposed action; (4) develop effective public participation strategies; (5) assure meaningful community representation in the process, beginning at the earliest possible time; (6) seek Tribal representation in the process.⁴⁴ The Draft GMP/EIS did not provide any explanation or analysis of its consideration of the above six factors.

Provisions of the Clean Air Act Section 309 require the EPA Administrator to comment in writing upon the environmental impacts associated with certain proposed actions of other federal agencies, including federal actions subject to NEPA. The EPA Administrator must also ensure that the effects on minority and low-income communities have been fully analyzed.⁴⁵ The

⁴¹ Exec. Order No. 12898, 50 Fed. Reg. 32 (Feb. 11, 1994), <http://www.archives.gov/federal-register/executive-orders/pdf/12898.pdf> (last visited June 6, 2015).

⁴² Presidential Memorandum of Understanding on Environmental Justice and Executive Order 12898 (Feb. 11, 1994), http://www.justice.gov/crt/about/cor/TitleVI/080411_EJ_MOU_EO_12898.pdf (last visited June 6, 2015).

⁴³ FINAL GUIDANCE FOR CONSIDERATION OF ENVIRONMENTAL JUSTICE IN CLEAN AIR ACT 309 REVIEWS, U.S. ENVIRONMENTAL PROTECTION AGENCY (July 1999) [hereinafter EPA GUIDANCE], http://www.epa.gov/compliance/resources/policies/nepa/enviro_justice_309review.pdf, (last visited June 6, 2015).

⁴⁴ ENVIRONMENTAL JUSTICE: GUIDANCE UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT; COUNCIL ON ENVIRONMENTAL QUALITY (Dec. 10, 1997), http://www.epa.gov/environmentaljustice/resources/policy/ej_guidance_nepa_ceq1297.pdf (last visited June 6, 2015).

⁴⁵ EPA GUIDANCE, *supra* note 43 at § 2.1.

comments must be made available to the public.⁴⁶ To account for potential environmental justice concerns, reviewers should be sensitive to whether affected resources, particularly natural resources important to traditional subsistence (e.g., hunting, fishing, gathering), are protected and to continue to sustain minority or low-income communities.⁴⁷ The analyses should be focused toward how potential effects to these resources may translate into disproportionately high and adverse human health or environmental effects on minority and/or low-income communities.⁴⁸

A minority community is identified by analyzing various sources including: data provided by state, county and local agencies; civic groups; and U.S. Census Bureau geographic data.⁴⁹ Agencies must evaluate potential impacts on native communities located beyond the geographic boundaries of the proposed action if the area is used for spiritual or subsistence purposes.⁵⁰ Members of the Hui and the Molokai community are a minority community that are located beyond the geographic boundaries of the Expansion and access the area for spiritual and subsistence purposes. According to the U.S. Census Bureau, the Native Hawaiian population comprises 25.89% of the entire population on Molokai.⁵¹ This is a significant percentage of the population, and supports the finding that the Environmental Justice Policy should apply to the Draft GMP/EIS.

A low-income community is identified by analyzing various sources including: U.S. Census Bureau Current Population Reports, Series P-60 on Income and Poverty; state and regional low-income and poverty definitions; and public outreach and other communication efforts that involve community members in defining their communities.⁵² According the U.S. Census Bureau, 20.94% of the entire population on Molokai is below the federal poverty threshold, and that number rises to 24.00% for Native Hawaiian households.⁵³ This is a significant percentage of the population, and supports the finding that the Environmental Justice Policy should apply to the Draft GMP/EIS.

Once the potential for adverse effects to a minority or low-income community is identified, agencies should analyze how the environmental and health effects are distributed within the affected community.⁵⁴ Agencies must state how it came to the conclusion that an

⁴⁶ EPA GUIDANCE, *supra* note 43 at § 2.1.

⁴⁷ EPA GUIDANCE, *supra* note 43 at § 2.3.2.

⁴⁸ EPA GUIDANCE, *supra* note 43 at § 2.3.2.

⁴⁹ EPA GUIDANCE, *supra* note 43 at § 3.0, Issue No. 1.

⁵⁰ EPA GUIDANCE, *supra* note 43 at § 3.0, Issue No. 1.

⁵¹ This percentage was calculated from data found on the U.S. Census Bureau’s website for the four Molokai zip codes: 96770, 96729, 96757, and 96748. Raw data sets can be accessed online by entering each zip code. COMMUNITY FACTS, AMERICAN FACT FINDER, U.S. CENSUS BUREAU, http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml (last visited June 7, 2015).

⁵² EPA GUIDANCE, *supra* note 43 at § 3.0, Issue No. 2.

⁵³ See *supra* note 51.

⁵⁴ EPA GUIDANCE, *supra* note 43 at § 2.3.3.

impact may or may not be disproportionately high and adverse.⁵⁵ The analysis and findings should be documented by the agency, including whether a disproportionately high and adverse health or environmental effect is likely to result from the proposed action and any proposed alternatives. Also, the EIS should identify how the action agency ensured that the findings were communicated to the public.⁵⁶ NEPA and the EPA require that all reasonable alternatives must be analyzed rigorously and objectively. The Draft GMP/EIS properly concluded that the Kalawao County does contain both minority and low-income communities. However, the NPS dismissed Environmental Justice as an impact topic because in its opinion it had solicited public participation; Plan C “would not result in any identified effects that would be specific to any minority or low-income population or community”; and the NPS “consulted and worked with the affected Native Hawaiian organizations and will continue to address the effects to traditional subsistence, religious, and ceremonial practice of Native Hawaiians and respond to the Hui’s and other NHO’s objections. Rather than concluding that the Expansion will have no adverse effects on a minority or low-income community, the NPS must implement mitigation measures to address those effects.

Agencies must implement mitigation measures to address effects, and “public participation efforts should be designed and conducted to ensure that effective mitigation measures are identified and that the effects of any potential mitigation measures are realistically analyzed and compared” and can include establishing a community oversight committee to monitor progress and identify potential community concerns.⁵⁷ The EPA may require the agency to submit to monitoring and reporting. Failure to implement effective mitigation measures may result in consequences and penalties imposed by the EPA upon the agency.

6. The Draft GMP/EIS Failed to Meet NHPA’s Section 106 Process Requirements.

The NHPA set the federal policy for preserving our nation’s heritage and to protect it from rampant federal development, after “more than a century of struggle by a grassroots movement of committed preservationists.”⁵⁸ The NHPA is codified in the Code of Federal Regulations’ Protection of Historic Properties, which provides detailed measures for compliance with the requirements of the NHPA.⁵⁹

When an action is deemed to be a “federal undertaking” and may affect a registered historic property or an area that would be eligible for registration as a historic property, then the “Section 106 Process” is triggered.⁶⁰ A federal undertaking “means a project, activity, or

⁵⁵ EPA GUIDANCE, *supra* note 43 at § 2.3.3.

⁵⁶ EPA GUIDANCE, *supra* note 43 at § 2.3.3.

⁵⁷ EPA GUIDANCE, *supra* note 43 at § 2.3.5.

⁵⁸ NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS, <http://www.ncshpo.org/nhpa1966.shtml> (last visited May 27, 2015).

⁵⁹ 36 C.F.R. § 800 (2000).

⁶⁰ *See id.* § 800.3.

program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.”⁶¹ An effect “means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.”⁶² Historic property “means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior . . . includ[ing] properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization (NHO) and that meet the National Register criteria.”⁶³

The NPS is a federal agency seeking to implement the Expansion presented in the Draft GMP/EIS. The Draft GMP/EIS is a project under the direct jurisdiction of the NPS and constitutes an undertaking. The Draft GMP/EIS has the potential to cause effects on an area that contains identified historic properties and is a property of traditional religious and cultural importance to a NHOs, including the Hui. Thus, the NHPA is applicable to the Draft GMP/EIS, and must comply with the Section 106 Process requirements. The NPS has properly begun the Section 106 consultation process, and released the Draft GMP/EIS in accordance with the Section 106 Process.

The Section 106 Process requirements for federal agencies include: (1) coordination with the appropriate State Historic Preservation Officer (hereinafter, “SHPO”);⁶⁴ (2) soliciting public participation through appropriate notice of proposed actions;⁶⁵ (3) “mak[ing]” a reasonable and good faith effort to identify any Indian tribes or Native Hawaiian organizations that might attach religious and cultural significance to historic properties in the area of potential effects and invite them to be consulting parties;⁶⁶ and (4) resolving adverse effects through continued consultation “with the SHPO and other consulting parties, including Indian tribes and Native Hawaiian organizations, to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects on historic properties.”⁶⁷

The Draft GMP/EIS properly concludes that “[f]or the purposes of Section 106, the entire Draft GMP/EIS is [an] area of potential effect” and that “identified historic properties within the area of potential effect [] may be affected by the proposed undertaking.”⁶⁸

The Draft GMP/EIS shows, however, that the NPS has not adequately consulted with all the relevant NHOs to make a determination that there will be “no adverse effect” to cultural and

⁶¹ See *id.* § 800.16(y).

⁶² See *id.* § 800.16(i).

⁶³ See *id.* § 800.16(l)(1).

⁶⁴ See *id.* § 800.3(c).

⁶⁵ See *id.* § 800.16(e).

⁶⁶ See *id.* § 800.16(f)(2).

⁶⁷ See *id.* § 800.6(a).

⁶⁸ DRAFT GMP/EIS, *supra* note 4 at 171.

environmental resources.⁶⁹ The Draft GMP/EIS determined that the effects would be either “beneficial”, “negligible”, or “minor” to: values, traditions, and practices of Traditionally Associated People (“TAP”); cultural landscapes; water resources and hydrologic processes; marine resources - coastal reef, habitats and wildlife; fishing, hunting, and gathering; wild and scenic rivers; and sustainable practices.

Because Plan C failed to meet the requirements of the Section 106 process, a follow-up alternative, amendment or addendum to the Draft GMP/EIS is necessary to determine the scope of impact on resources to the greater Molokai community.

7. Cultural Landscapes, Ethnographic Resources, and Traditionally Associated People

The NPS defines TAP as “ethnic or occupational communities that have been associated with a park for two or more generations (40 years) . . . [and] assign[s] significance to ethnographic resources—places closely linked with their own sense of purpose, existence as a community, and development as ethnically distinctive peoples.”⁷⁰

The Draft GMP/EIS identifies the patient community as the only TAP that it currently consults with. The Draft GMP/EIS briefly mentions the displacement of a Pre-Settlement Native Hawaiian Community between 1865 and 1895 that resulted in “a loss of ancestral connections to the land and a loss of cultural knowledge and traditions relating to the landscape.”⁷¹ Although “NPS hopes to consult with these descendants about park resources and management,” it has not yet done so.⁷² The NPS must make a reasonable and good faith effort to identify and consult with these descendants and include them in every step of the Section 106 process. It has failed to do so.

The lands of the Kalaupapa National Park are owned by the Department of Hawaiian Homelands (“DHHL”), and are leased to the NPS. Therefore, the DHHL beneficiaries are stakeholders in the Draft GMP/EIS, and should be recognized as a TAP, however, the Draft GMP/EIS failed to do so. The Hui believes that the DHHL is making a good faith effort to consult with the beneficiaries, however the NPS should expressly include DHHL beneficiaries as a TAP in the Draft GMP/EIS.

TAPs “include more than Indians or other groups with clear ethnic boundaries . . . [and] can be defined by occupation or lifestyle.”⁷³ In determining whether to qualify a group as a TAP,

⁶⁹ *See id.*

⁷⁰ NATIONAL PARK SERVICE, MANAGEMENT POLICIES 2006, <http://www.nps.gov/policy/mp/policies.html> (last visited May 27, 2015).

⁷¹ DRAFT GMP/EIS, *supra* note 4 at 181.

⁷² *See id.*

⁷³ NATIONAL PARK SERVICE, PARK ETHNOGRAPHY PROGRAM, http://www.nps.gov/ethnography/training/A_TAP/overview.htm (last visited May 27, 2015)

the NPS should focus on “peoples’ sense of place” and consider factors such as individuals’ genealogy, knowledge of place names, detailed environmental knowledge, use and stewardship of resources, and lifestyles associated with home place and identity.⁷⁴ The NPS must make a reasonable and good faith effort to establish who these resource users are through assessments, studies, and interviews.⁷⁵ The NPS’s failure to initially engage Molokai’s traditionally associated people may have broader “implications for [cultivating] long-term relationships” and result in “troublesome political repercussions” when a climate of caution results from a failure to initiate conversations earlier on.⁷⁶ The NPS must “assume a more aggressive, proactive form of consultation” so that TAPs and NHOs “may be heard as they are often ignored through conventional assessment methods.”⁷⁷

8. NPS Failed to Engage in a Comprehensive Consultation Process and
Negotiate a Consensus-Driven Agreement among State Actors and NHOs

Consultation is defined as “the process of seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the Section 106 process.”⁷⁸ This consultation process is critical “so that a broad range of alternatives may be considered during the planning process for the [federal]undertaking.”⁷⁹ Here, the NPS was required to make a reasonable and good faith effort to identify all NHOs and invite them as consulting parties. This also includes individuals who may no longer live near to the project area, but have ancestral ties or associate religious and cultural significance to the area. Many of the original families that associated Kalaupapa as their ancestral home but were relocated to make way for quarantine of Hansen’s disease patients were likely not consulted in this process.

While the Draft GMP/EIS listed individuals and groups to consult with, in practice, the NPS has done little to meet the rigorous consultation requirements under Section 106, NHPA. The NPS had not adequately consulted beforehand with all relevant NHOs and TAPs to substantiate its determination in the GMP that there will be “no adverse effect” to cultural resources.”⁸⁰

quoting Dr. Muriel 'Miki' Crespi, Chief Ethnographer, Archeology and Ethnography Program, National Ctr. for Cultural Resources; some examples of TAPs are: sport fishermen in Cape Cod; gangs, nudists, pagans, and ORV users at Indiana Dunes National Park; and orchard farmers at Capitol Reef [hereinafter Ethnography Program”).

⁷⁴ *See id.*

⁷⁵ *See id.*

⁷⁶ *See id.*

⁷⁷ *See id.*, *quoting* Professor Benita J. Howell, Professor of Anthropology, The University of Tennessee.

⁷⁸ 36 C.F.R., § 800.16(f).

⁷⁹ 36 C.F.R., § 800.1(c).

⁸⁰ *See id.*

One member of Hui Ho‘opakele ‘Āina was informed that a recent 3-hour webinar of which one hour was taken up to describe the GMP and the two remaining hours open for Q&A sufficed to meet NPS’ Section 106 consultation obligations. That webinar was poorly attended with only a handful of private individuals and with mostly state and federal government agency representatives present.

Plan C’s Expansion includes the area known as the “North Shore” on Molokai from which many “Topside Community”⁸¹ families procure certain resources that are critical to their survival and subsistence living.⁸² The NPS has failed to work aggressively and proactively to determine who those stakeholders are, expressly include them as a TAP, and consult with them directly throughout and after all stages of the Section 106 Process. Failure to do so could damage long-term relationships with the community, and result in negative political, social, and legal consequences.

One way that the NPS must consult with the Topside Community and NHOs is through the ‘Aha Kiole o Molokai, the island’s local decision-making body which is part of the larger Statewide ‘Aha Moku Advisory Committee (“AMAC”). The AMAC advises the State Department of Land and Natural Resources (“DLNR”) on natural and cultural resource management issues that impact Native Hawaiian rights and traditional religious and subsistence practices.

The NPS has repeatedly ignored the Molokai community’s strong opposition to the Expansion and any management by the federal government. The Hālawā and North Shore Studies’ findings that the Expansion areas would be best protected under NPS management “were not widely supported locally” and “the position of the local community favored local community management of the North Shore over any management by non-Molokai entities and state and federal agencies.”⁸³ The NPS ignored this community consensus, preferring to adopt Plan C, which includes the federal management of the Expansion area.

Plan C’s failure to engage in a comprehensive consultation process and negotiate a consensus-driven agreement among state actors and NHOs constitutes a violation of NHPA’s Section 106 process.

9. Water Resources

Molokai has largely been considered a barren land with limited freshwater resources.⁸⁴ The valleys on the North Shore are the only areas that receive steady rainfall year-round with

⁸¹ “Top Side Community” are Molokai residents who do not live in Kalaupapa, and are not able to engage in the DHHL consultation process as beneficiaries.

⁸² JON K. MATSUOKA ET AL., MOLOKAI: A STUDY OF HAWAIIAN SUBSISTENCE AND COMMUNITY SUSTAINABILITY 33 (Marie D. Hoff, 1st ed. 1998).

⁸³ See *id* at 87 (emphasis added).

⁸⁴ See GUPTA, *supra* note 10 at 5.

heavy rains in the winter.⁸⁵ The Expansion includes many of the valleys on the North Shore, which are vital watershed resources capable of sustaining traditional lo‘i and other traditional methods of farming. The valleys, streams, and watersheds on Molokai should remain as they are until they can be restored to their historic, traditional use, once again making Molokai ‘Āina Momona, the land of plenty.⁸⁶ Water is “at the center of sustainable taro culture” and is life-giving to Hawaiians.⁸⁷ Studies show that taro lo‘i require an average of 260,000 gallons per acre, per day.⁸⁸

Plan C’s analysis covers only the effects of climate change, construction and maintenance of buildings, and water diversion from Waikolu streams. It concludes that the impact on water resources from these factors will be adverse, and names climate change as the “dominant factor influencing water resources.”⁸⁹ Plan C does not provide a future strategy for the rivers, streams, and watershed resources within the Expansion, nor does it assess any impact on the water resources within the Expansion.

The Draft GMP/EIS’s failure to assess impacts to the water resources within the Expansion constitutes a violation of NHPA’s Section 106 process.

10. Fishing, Hunting, and Gathering

The Governor’s Molokai Subsistence Task Force Final Report showed that 87% of Molokai residents depend, in varying degrees, upon resources obtained through fishing, hunting, and gathering for their families’ subsistence.⁹⁰ The subsistence study indicates that Molokai residents are, for the most part, able to successfully fish, hunt, and gather the resources necessary for their families’ survival. Seventy-two percent of the respondents stated that “they were still able to fish, hunt, and gather” without interference.⁹¹ Molokai families access land and ocean resources that are included in the proposed Expansion area considered in the Kalaupapa GMP/EIS.

The Draft GMP/EIS states that “hunting would continue to be permitted per State of Hawai‘i hunting regulations.” This conclusion, however, forecloses any consideration of alternative hunting management models. One alternative is the model adopted by the

⁸⁵ DRAFT GMP/EIS, *supra* note 4 at 20.

⁸⁶ *See* GUPTA, *supra* note 10 at 5.

⁸⁷ DAVID C. PENN, WATER NEEDS FOR SUSTAINABLE TARO CULTURE IN HAWAI‘I 132 (University of Hawai‘i 1993).

⁸⁸ STEPHEN B. GINGERICH ET AL., WATER USE IN WETLAND KALO CULTIVATION IN HAWAI‘I 1 (Office of Hawaiian Affairs, U.S. Geological Survey 2007).

⁸⁹ DRAFT GMP/EIS, *supra* note 4 at 261.

⁹⁰ DONA HANAIKE ET AL., GOVERNOR’S MOLOKAI SUBSISTENCE TASK FORCE FINAL REPORT 43 (Jon Matsuoka et al. eds., Dept. of Business, Economic Development, and Tourism 1994) (“Subsistence Report”).

⁹¹ *See id.*

Department of Hawaiian Home Lands (hereinafter, “DHHL”) which turned over management of game hunting on the West End of Molokai to Hawaiian homesteaders in Ho‘olehua.⁹² Plan C assesses fishing, hunting, and gathering practices and impacts for the existing park boundaries, but fails to evaluate the impact the proposed Expansion will have upon these practices.

The NPS’s failure to assess impacts to fishing, hunting, and gathering practices within the proposed Expansion area constitutes a violation of NHPA’s Section 106 process.

11. Sustainable Practices

Studies show that if shipping operations to Hawai‘i were disrupted, “the state’s inventory of fresh produce would feed people for no more than 10 days.”⁹³ Hawai‘i is alarmingly dependent upon food that it is not grown here. Rather than providing a solution to the food problem, big agricultural companies use Hawai‘i as a major testing ground for their pesticides and genetically modified foods, increasing the risk of residents contracting diseases, cancers, and respiratory problems.⁹⁴

Prior to Western contact, Hawai‘i’s resource system was based on community sharing and careful management of resources.⁹⁵ Hawaiians believed the ali‘i⁹⁶ were divinely appointed to (“administer”) the ‘āina⁹⁷ for the benefit of the gods and society as a whole.”⁹⁸ The ali‘i appointed konohiki⁹⁹ to manage ahupua‘a.¹⁰⁰ Konohiki “were masterful managers who possessed a deep knowledge of the natural resources of their ahupua‘a.”¹⁰¹ They were “stewards of their

⁹² MATSUOKA ET AL., *supra* note 82 at 41.

⁹³ Maureen N. Mitra, *Trouble in Paradise: Hawaiians Push Back Against Big Ag*, EARTH ISLAND JOURNAL, Spring 2014, at 18-23.

⁹⁴ *See id.*

⁹⁵ LILIKALĀ KAME‘ELEIHIWA, NATIVE LAND AND FOREIGN DESIRES: PEHEA LĀ E PONO AI? 26-29 (1992).

⁹⁶ *Ali‘i*: Chief, chiefess, officer, ruler, monarch, peer, headman, noble, aristocrat, king, queen, commander; MARY KAWENA PUKUI & SAMUEL H. ELBERT, HAWAIIAN DICTIONARY 20 (rev. & enlarged ed. 1986).

⁹⁷ *‘Āina*: Land, earth; PUKUI & ELBERT HAWAIIAN DICTIONARY, *supra* note 96, at 11.

⁹⁸ 1 NATIVE HAWAIIANS STUDY COMM’N, REPORT ON THE CULTURE, NEEDS AND CONCERNS OF NATIVE HAWAIIANS 254 (1983), *available at*

<http://babel.hathitrust.org/cgi/pt?id=mdp.39015034241094> (last visited April 13, 2014)

⁹⁹ *Konohiki*: Headman of an ahupua‘a land division under the chief; land or fishing rights under control of the konohiki; *supra* note 96, at 166.

¹⁰⁰ *Ahupua‘a*: Land division usually extending from the uplands to the sea, so called because the boundary was marked by a heap (ahu) of stones surmounted by an image of a pig (pua‘a); *supra* note 96, at 9; KAME‘ELEIHIWA, *supra* note 95, at 30-31.

¹⁰¹ John N. Kittinger PhD, *Konohiki Fishing Rights*, GREEN MAGAZINE HAWAI‘I, October 2009, at 45, *available at*

resources and communities . . . charged with safeguarding the production and perpetuation of the ‘āina and sea resources in their ahupua‘a.”¹⁰² This complex system of aloha ‘āina (literally, “love of land”) enabled a high level of productivity, ensured that all members of the ahupua‘a, from the ali‘i to the maka‘āinana¹⁰³ were provided for, and that the resources were never overtaxed.¹⁰⁴

Under this traditional system of aloha ‘āina, Kalaupapa thrived as a “garden paradise” to Hawaiians, and “wall after wall after wall” of agricultural gardens still remain.¹⁰⁵ Molokai was then known as an island of ‘āina momona,¹⁰⁶ producing enough surplus food to feed neighboring islands. Now, more than ever, Hawai‘i needs Molokai and her verdant valleys to return to a state of plentiful abundance. Hawai‘i’s emancipation from its dependency upon food shipments would go a long way in truly achieving environmental and food sustainability in the future.

The Draft GMP/EIS completely missed the mark in assessing future sustainable practices, and failed to see the “bigger picture” for the future of Molokai’s north shore. The Draft GMP/EIS states that it will fulfill its object of implementing sustainable practices by designing energy and water-efficient facilities, limiting the number of vehicles used, bicycle use, recycling, and by installing supposed “environmentally friendly” CFL light bulbs that release “cancer-causing chemicals” when switched on.¹⁰⁷ While all of these initiatives (with the exception of the CFL light bulbs) will contribute to sustainability efforts, their cumulative effects will be negligible, and should be considered “best practices” rather than a plan for sustainability.

Because the Draft GMP/EIS failed to offer any substantial plan for sustainability within the existing park, it is not a qualified steward to take over management of the areas within the Expansion.

12. Conclusion and Recommendations

The Plan misses the mark when it comes to the larger history of the Hawaiians and their culture, especially those who loss their lands and were displaced. It also misses the mark when it

http://www.researchgate.net/publication/258133637_Konohiki_Fishing_Rights (last visited May 30, 2015).

¹⁰² See *id.*

¹⁰³ *Maka‘āinana*: Commoner, populace, people in general; citizen, subject; PUKUI & ELBERT HAWAIIAN DICTIONARY, *supra* note 96, at 224.

¹⁰⁴ Kittinger, *supra* note 101.

¹⁰⁵ Kalaupapa Videotape, *supra* note 9.

¹⁰⁶ ‘Āina momona: literally “fat land”; an abundant land, or land of plenty; Molokai was known as the land of “fat fish and kukui nut relish,” Clair Gupta, *Food Sovereignty: A Critical Dialogue*, YALE UNIVERSITY AGRARIAN STUDIES, Sept. 14-15, 2013 at 5,

http://www.yale.edu/agrarianstudies/foodsovereignty/pprs/70_Gupta_2013.pdf (last visited May 30, 2015).

¹⁰⁷ 5A-38 Lawyers' Medical Cyclopedia § 38.45c.

Hui Ho‘opakele ‘Āina’s Comment Letter Regarding Kalaupapa NHP’s GMP/EIS

June 3, 2015

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comes to the future of the DHHL Hawaiians who own the lands. Last but not least, the plan does little to recognize or mitigate the future impacts on the people who live on Molokai.

The plan calls for the acquisition of thousands of acres of important agricultural lands, which hold the food security future of Molokai.

The plan calls for the Hawaiians and their culture to be treated as a museum piece that needs to be “protected and preserved” so as to be put on display for the American public. In contrast, the consultation process showed a clear voice for the need of a working group or task force consisting of DHHL beneficiaries and OHA beneficiaries along with the NPS. It is clear that these beneficiaries saw Kalaupapa as an integral part of their future with resources that needed to be not only protected, but more importantly, used traditionally and “enhanced.”

A working group task force is critical to address the many unanswered concerns raised during the consultation process of the DHHL land owners and the community of Molokai, here are a few of the deficiencies in the Draft GMP/EIS that must be addressed:

- Restoration plans for Waikolu Valley were not adequately addressed in the Draft GMP/EIS. Special management areas and focus areas are needed to address indigenous peoples concerns and needs.
- Recognition and Benefits to displaced Hawaiian families; DHHL Homesteaders; and the Molokai community overall were either not addressed or are woefully lacking.
- The Draft GMP/EIS fails to recognize constitutional and statutory protections of traditional and customary Hawaiian rights.
- The Draft GMP/EIS fails to acknowledge and integrate the provisions in the United Nations Declaration on the Rights of Indigenous People (hereinafter, “UNDRIP”) that has been adopted by the United States and incorporated into the Section 106 consultation process.
- The NPS failed to recognize and consult with the ‘Aha Kiole o Molokai, the local decision-making body associated with the Statewide ‘Aha Moku system for natural and cultural resource management.

We oppose the following actions proposed by NPS:

- The proposed Expansion of the Park boundaries.
- Any new federal designations of Molokai’s north shore cliffs and rivers
- The inclusion of Pala‘au State Park which is part of DHHL’s management as part of the overall Kalaupapa NHP GMP. Federal NPS boundaries should include only the one “look out” and trail head areas.

We request the following:

- Recognize a prioritized multi-layered definition of the users of the park: DHHL members, Hawaiian families who were displaced in 1865, Molokai top side community, general public.

Hui Ho'opakele 'Āina's Comment Letter Regarding Kalaupapa NHP's GMP/EIS

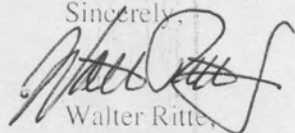
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- Establish an "Advise and Consent" decision-making agreement with a "Top Side" community panel for management of the park.
- Initiate a management "Partnership" relationship with DHHL and NPS besides just a lease agreement.
- Allow "special" DHHL homesteading in Integrated Resources Management Areas.
- Designate "Special Use Areas" or "Focus" areas in the Integrated Resource Management Zone to allow for living, traditional Hawaiian activities such as lo'i cultivation and homesteading.
- Maintain "Kalawao County" as a separate county from Maui County.
- Establish a budget for "invasive plant removal" of the Integrated Resources Management Zone.
- Protect Waikolu River from further water diversions.
- Law enforcement within the Kalaupapa NHP should remain in accordance with State and County laws. Residents should not be subjected to federal laws and NPS workers should not be "deputized" in a manner that imposes egregious or aggressive enforcement of federal laws that fail to respect traditional and customary Hawaiian rights.

In conclusion, the Draft GMP/EIS fails to sufficiently acknowledge the impact the establishment of the Park has had on the larger Hawaiian community and the Hawaiian homestead community who have been denied access to these Trust resources – and who need these Trust resources. The GMP/EIS treats the Park's continued control of our lands as a foregone conclusion. While we recognize the need to honor the many patients who have lived in Kalawao, this area also has a larger history and needs to be returned to Moloka'i. That option was not even contemplated as an option under the Draft GMP/EIS. Therefore we find this plan inadequate and are asking the NPS to conduct a revised DEIS or a supplemental DEIS to include an option whereas DHHL lands are returned to the people of Moloka'i.

Sincerely,



Walter Ritter

Hui Ho'opakele 'Āina

Phone Comments Re: Kalaupapa GMP

Daniel Keomaka

May 14, 2015

Phone Call – 11:25 am

- Last 5 survivors – Does the State takes over?
- First experience in Moloka'i in 1968 – picked pineapple
- I applied for pastoral lands – at that period, claimed cattle had virus, but because Moloka'i Ranch didn't kill cattle, no awards given
- Even dreaming of going to Moloka'i is out – if I was put on when I was supposed to be put on, then I would have had a chance; I was a great worker
- Took a survey every year – census every year – they knew who was Hawaiian – State was the trustees – they did a lousy job of awarding me, now I'm cripple
- I went to Kalaupapa and 2 aunties who lived down there
- I love that place and took me back in time
- I would like to see Kalaupapa stay the way it is
- Put all of the AIDS patients down to Kalaupapa; can't see people spreading sexual diseases; From leprosy to AIDS, to contain disease
- No sense in sending me any letters about any land because I'm 62 now.

Lurline Badeax

808-668-6151

May 22, 2015

Phone Call – 5:45 pm

- I have a 2.5 acre farm lot in Kalama'ula
- I can't make the meeting
- I am ok with whatever they decide on Kalaupapa; it's ok with me



**Ka 'Ohana O Kalaupapa
Board of Directors**

Clarence "Boogie" Kahilihiwa
President

Pauline Ahulau Chow
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Gloria Marks
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Director

Jason Umemoto
Director

Charmaine Woodward
Director

Valerie Monson
Coordinator and Secretary

June 8, 2015

Erika Stein Espaniola, Superintendent
Kalaupapa National Historical Park
PO Box 2222
Kalaupapa, Hawaii 96742

Dear Erika,

The Board of Directors of Ka 'Ohana O Kalaupapa thanks the National Park Service for recognizing the importance of creating and implementing a General Management Plan for Kalaupapa National Historical Park. We trust that the Park Service will seriously consider our comments that are listed below. We believe our recommendations will make the plan stronger and more inclusive.

Ka 'Ohana O Kalaupapa is a nonprofit organization made up of Kalaupapa residents, family members and longtime friends. Since we organized in 2003, our President has always been a Kalaupapa resident – first Kuulei Bell and now Boogie Kahilihiwa. We have two other Kalaupapa kupuna on our Board as well as seven family members and two longtime friends. Eight of our 12 Directors are Native Hawaiians. Our mailing list now includes more than 1,200 individuals.

The 'Ohana continues to support the Position Paper we submitted to the Park Service in 2009 following the first round of public hearings – as well as the comment letter we submitted following the second round of hearings in 2011.

We trust that the project leaders of the GMP will reach out to Ka 'Ohana O Kalaupapa when preparing the revisions to give the 'Ohana its due recognition and include language that recognizes the 'Ohana as a long-term partner already in charge of certain programs related to Kalaupapa.

The 'Ohana is also concerned about how the final plan will be determined – what is the decision-making process of the NPS? As you have heard, members of the public have expressed frustrations that they have been involved in the GMP process since 2009 or after and yet they feel their voices have not been heard. What weight do public comments carry as opposed to the opinions of the NPS administration, most of whom are located outside of Hawai'i?

These are our comments about the proposed General Management Draft issued in April, 2015:

There is little mention of Ka 'Ohana O Kalaupapa. It is quite disappointing that there is barely any mention of Ka 'Ohana O Kalaupapa in the GMP considering all that the 'Ohana has done in the past 12 years in advocating for the Kalaupapa community, assisting family members in learning about their ancestors, developing educational programs and public presentations that have been traveling around the islands for the past few years and working for preservation of

this important history. The 'Ohana also has been assigned a house at Kalaupapa by the Department of Health for use as a headquarters and future museum to honor the wishes of Bernard Punikai'a. The 'Ohana should be included as a long-term partner in the GMP and be given credit for the many improvements and programs we have made possible. It's also disappointing that the Position Paper we submitted in 2009 to NPS is not even included among the several plans and documents used to prepare the GMP – it is simply referenced. Our Position Paper was written with the input of the Kalaupapa community and endorsed by the Board of Trustees of the Office of Hawaiian Affairs and now-Senator Mazie Hirono among others.

The plan fails to recognize the programs developed by the 'Ohana while proposing that the NPS duplicate them using taxpayer money. NPS is now proposing to develop programs to reach out to the families of Kalaupapa and schools, conduct public presentations and create exhibits – projects already created, funded and made highly successful by Ka 'Ohana O Kalaupapa. Several years ago, the 'Ohana saw the need for this outreach and we have since reached thousands of students, family members and other members of the public across Hawai'i. Our "Restoration of Family Ties" program has helped more than 500 families reconnect with their ancestors – we have information on more than 7,200 people sent to Kalaupapa in our digital library from our research of public archives. Three of our programs have been presented with Preservation Awards by the Historic Hawai'i Foundation.

Since 2011, we have visited almost every island at least once a year – except Ni'ihau -- and most of those islands we have visited more than once a year in our efforts to seek out more families and provide the public with an opportunity to hear about our work. Our schools outreach program has grown to the point where we now have a team of Hawaii educators beginning to work on curriculum on how to include the history of Kalaupapa in classrooms. Our traveling exhibits have appeared at UH-Manoa, six community colleges, museums, public places and we are now going into the high schools. The 'Ohana hopes that the NPS would support these programs already developed and being conducted by the 'Ohana and not use taxpayer money for duplicate purposes.

The Kalaupapa Memorial is barely mentioned in the 325-page plan. The Kalaupapa Memorial is barely mentioned in the GMP and we believe it will be the most significant addition to Kalaupapa over the next several years. The Memorial should be included as a project common to all alternatives.

In addition there are two serious mistakes about the Memorial that need to be corrected in the final GMP. On Page 37, it states that the Memorial will be located "near" the former Baldwin Home for Boys. This is not correct – it will be located within the rock walls of the former Baldwin Home which is now open space. This has been the preferred location of Kalaupapa residents for many years. The second error is on page 226 where it states the legislation passed by Congress and signed into law by President Obama authorizes the 'Ohana to "install" the Memorial. Again, this is not correct. The law authorizes the 'Ohana to "establish" the Memorial which we are doing – we will build the Memorial and lead the operations and maintenance. These corrections need to be made to the final GMP.

We do not support the proposed boundary amendments where NPS would acquire lands within Pelekunu and Halawa valleys. When Kalaupapa National Historical Park was established in 1980, it was at the invitation of the people of Kalaupapa to preserve their lifestyle and the important history at Kalaupapa. It appears these new lands could

be the start of the North Shore National Park where recreation could be emphasized rather than the human history of Kalaupapa. The draft GMP states that the current NPS staff at Kalaupapa would be responsible for managing this additional 12,000 acres. Considering that the NPS had to furlough staff in the summer of 2014 because of economic cutbacks, we believe that the programs at Kalaupapa could suffer if staff is also responsible for these additional lands.

We also believe that the proposal for the NPS to take over these lands has a direct impact on all the people of Molokai. It is disappointing that it appears that the NPS has already been involved in serious discussions with the landowners about obtaining these lands, but without public input until now. The comments of residents of Kalaupapa and upper Molokai need to be carry additional weight in the final decision to acquire these lands.

More serious discussion need to take place with the beneficiaries about homesteading in the future at Kalaupapa. There still seems to have been little discussion about homesteading at Kalaupapa other than meetings with officials (we are aware of the meeting held last month with beneficiaries on upper Molokai). The NPS currently has a lease for approximately 1,300 acres of Hawaiian Homelands that make up the ahupua`a of Kalaupapa – this lease expires in 2041. For the past 11 years, the 'Ohana has been encouraging NPS and DHHL to have discussions about the future not only with DHHL officials in Kapolei, but with the beneficiaries, those who have lots and those on the wait list. These discussions – not lip service – simply must happen or people will feel left out when a decision is made. One meeting every few years is not sufficient.

If homesteading is allowed, can preference for homesteads be given to descendants of those sent to Kalaupapa because of government policies regarding leprosy and/or the kama`aina who were there when the settlement was started? These individuals would carry on the legacies of their ancestors in the very place where they lived.

In addition, the 'Ohana continues to support our 2009 Position Paper where we stated that we oppose any land exchange between the Department of Hawaiian Homelands and the NPS or any other federal agency for the land at Kalaupapa.

A cap for visitors must be set. There is no set number for visitors allowed at Kalaupapa per day in Alternatives C and D – although during public hearings held in May, 2015, NPS officials stated that there was a “facility capacity” of about 300 persons per day at Kalaupapa. This is a dangerously high number that could destroy any preservation efforts at Kalaupapa.

As we all know, there is currently a limit of 100 visitors a day – this number was determined by the Kalaupapa community. In the future, there must be a set number of visitors. The visitor cap should be reviewed annually. Too many visitors at Kalaupapa will quickly ruin the special feeling one gets of being on sacred ground. In the Position Paper submitted in 2009, Ka 'Ohana O Kalaupapa recommended that when there are no longer individuals who were once isolated under the old laws living at Kalaupapa, there should be a limit of 150 day-only visitors with a limit of 25 overnight visitors. These numbers should also be reviewed annually – and lowered, if necessary, to protect the resources. The 'Ohana also recommended that family members be given preference for visitation.

There still seems to be an emphasis on visitors, but little mention of family members or Native Hawaiians. As we started in our 2011 comment letter, family members should

not be considered visitors in the land of their ancestors and Native Hawaiians should not be considered visitors in their own land. Preference to visit Kalaupapa should always be given to family members and Native Hawaiians.

As we stated in our 2011 comment letter, Native Hawaiian access rites must be recognized. We do not see this addressed in any of the alternatives – Native Hawaiian access rites should be common to all alternatives. Some Hawaiians have expressed interest in growing kalo in Waikolu Valley or having access to other parts of the Makanalua peninsula for agricultural purposes, gathering rites and spiritual practices. These proposals have merit and should be pursued with ongoing discussions on how to allow this access without destroying the resources or sacred feeling of Kalaupapa.

Kalaupapa will always be a place – not a park. It is troubling that the NPS continually references Kalaupapa as “the park.” To many of us who have been connected to Kalaupapa for many years, Kalaupapa is a community and the home or final resting place of ancestors and loved ones. Kalaupapa National Historical Park has certainly become an important part of Kalaupapa, but Kalaupapa is not -- and will never be -- “a park.”

Members of Ka 'Ohana O Kalaupapa – and others from the public -- should be allowed to fill vacant seats on the Kalaupapa National Historical Park Advisory Commission. The application process to the KNHP Advisory Commission should be posted on the KHNP website so more individuals are aware of any vacancies – and how they can apply. If Kalaupapa kupuna are no longer able to serve on the Commission or if there are other openings, family members and Native Hawaiians should be given first preference to fill any vacancy.

A Kalaupapa Task Force of interested parties should be created. This idea was suggested by Native Hawaiians on upper Molokai who have an interest in the future of Kalaupapa. There are many organizations involved at Kalaupapa in addition to the descendants of the kama'aina and those sent to Kalaupapa along with the Native Hawaiians on upper Molokai. A Task Force with representatives of all of these voices should be established so plans can be discussed with public input.

Ka 'Ohana O Kalaupapa should be consulted on decisions that will be made when there is no longer a living community of those who were sent there under the isolation laws – this is the land many of us or our ancestors called home. The 'Ohana should be an acknowledged voice in decision-making, especially on such key issues as those listed above.

While this GMP was 325 pages long with many more pages attached, none of the written public comments received since 2009 were attached. All written comments, including the Position Paper of Ka 'Ohana O Kalaupapa, should be part of the final GMP in both electronic and print form. These comments will be an important part of the record for future reference.

We appreciate the opportunity to offer our concerns and recommendations. If you have any questions or would like to review any revisions, please contact our Coordinator, Valerie Monson, at vmonson@kalaupapaohana.org or 808-573-2746.

Ka 'Ohana O Kalaupapa hopes that our comments are helpful and we hope the National Park Service will accept additional comments that might arise at a later date and continue these discussions. We look forward to working with the Kalaupapa

community, the National Park Service and other interested parties in the future to preserve this important place and present the history of the people of Kalaupapa in the way they want to be remembered.

Mahalo nui loa,

A handwritten signature in black ink, appearing to read "Clarence Kahilihiwa". The signature is fluid and cursive, with the first name "Clarence" being more legible than the last name "Kahilihiwa".

Clarence "Boogie" Kahilihiwa
President

[REDACTED]

Bryan Harry

[REDACTED]

30 May 2015

Erica Stein Espaniola, Supt.
Kalaupapa National Historical Park

Dear Erica and KALA GMP planning staff:

As presented in the draft Kalaupapa GMP, the alternatives do not represent the range of views I thought were expressed by all the publics, and thus this draft does not meet minimum NEPA requirements:

First, all alternatives presented allow only very few visitors, and at best, they must be personally 'escorted' to most of the park. In all alternatives visitors are prohibited from entry to a wide expanse of the park—unless seemingly they are licensed hunters. (Get a hunting license, carry a rifle, to visit the park seems the only way.) The alternatives presented appear to represent only the viewpoint of the self-proclaimed expert group (who championed the Memorial at Kalawao) and they do not represent all of the park's various publics.

Second, no alternative copes with the real possibility that the NPS will not have sufficient operational funds to pay Hawaiian Homes lease fees as that amount severely escalates when the State Department of Health is no longer the active occupant.

These two omissions are intertwined, for Kalaupapa is a very expensive park. It is one of the very most expensive in the entire NPS as viewed by the annual operations cost per annual visitor. It will need visitors to advocate to the Congress to continue to fund this park. This need increases in spades when soon the State Department of Health withdraws and the unfunded increase in lease payments to Hawaiian Homes is automatically thrust upon the park.

I regard visitor interest as essential to compete for future funding. Anecdotally, I have taken many members of the House Appropriations Committee and members of OMB to Kalaupapa. Without exception their expressed view as we waited to fly **to** Kalaupapa was "why is this isolated leper colony a national park; why should we spend a dime on it?" And without exception **after** they had visited they expressed that "Kalaupapa and its Hansen's disease story was even internationally significant and warranted its national park status." Only after visiting did they support us for funds. Whether it is stopping Bureau of Reclamation from building dams in the Grand Canyon, or hustling Congress to fund Kalaupapa—we need park visitors.

In remedy I suggest you include two further alternatives—

Preferred Alternative. After there are no patients the park would not limit the number of day-use visitors. Overnight use would be limited to just the number that could be reasonably accommodated by adaptive use of existing historic buildings. A small walk-in campground would be considered if demand warranted.

Worst-case alternative. If the NPS fails to obtain funding for the significantly greater lease payments to Hawaiian Homes (when patients are gone) seek to add the North Shore Cliffs proposal lands and waters to the remaining Kalaupapa National Historical Park lands. Thus, even sans the Hawaiian Homes lands, this would be a viable national park whose primary focus would still be on the Hansen's Disease themes, but illustrated by the Kalawao Settlement.

Thank you for the opportunity to comment,

s/Bryan Harry



KALA GMP, NPS <kala_gmp@nps.gov>

From NPS.gov: Kalaupapa

1 message

[REDACTED] >
To: KALA_GMP@nps.gov

Mon, Jun 1, 2015 at 12:40 PM

Email submitted from: [REDACTED] /kala/learn/management/gmp.htm

I am a Molokai resident and homeowner... I am here to honor the people and respect them. LET THE INDIGENOUS PEOPLE of the island of Molokai decide wht THEY want to do with this land - it is theirs, their history, their Story, and to make this place into a tourist destination would minimize what could be a Righteous and Honorable way to deal with the changing times... do the right thing, Robin Rose MD



KALA GMP, NPS <kala_gmp@nps.gov>

Kalaupapa - A Place of Reflection NHP GMP/EIS

1 message

sarah lopes <[REDACTED]>
Reply-To: [REDACTED]
To: "KALA_GMP@nps.gov" <KALA_GMP@nps.gov>

Tue, Jun 2, 2015 at 1:20 AM

Dear National Park Services,

I am emailing my thoughts pertaining to future plans for Kalaupapa. As a descendant of a patient sent to Kalaupapa in 1899, I have strong feelings regarding future changes which may take place, as well as Ka 'Ohana O Kalaupapa being a long term partner involved in the planning. I trust the Ohana to fairly represent the thoughts and feelings of individuals with a personal interest in Kalaupapa

Thank you in advance for your kind consideration of the feelings of Kalaupapa residents and family.

Mahalo,
Sarah Lopes



Kalaupapa NPS.docx
21K

With discussions of future plans for Kalaupapa in the news recently, I feel the need to share my experience and views on Kalaupapa and Ka 'Ohana O Kalaupapa.

I first heard of Ka 'Ohana O Kalaupapa in 2009 after reading a story in the Honolulu Advertiser. The story was about the Ohana gathering stories of Kalaupapa patients. My great-grandmother was a patient at Kalaupapa, and my grandmother was born there. I emailed their names to the Ohana in the hopes of receiving a small bit of information. My thought was more than 100 years had passed, so I shouldn't expect much.

I emailed my relative's names to the Ohana and received a response from Valerie Monson, Secretary/Coordinator of Ka 'Ohana O Kalaupapa. After speaking with Kalaupapa's historian she shared an amazing amount of information with me. The information I received was far more than I expected! I found out when my great-grandmother was sent to Kalaupapa, her age at the time, and that my grandmother had a twin sister. I found out the twins were raised at Kalaupapa for 18 months before being sent to Kapiolani Home for Girls on Oahu. The best surprise of all was when I received a photo of my great-grandmother which was taken at Kalihi Hospital prior to her internment. Suddenly my great-grandmother was a real person, not just a name. I had never even heard of the Kapiolani Home for Girls or the Kalihi Hospital. I cannot emphasize how exciting it was to receive details of the family we had never known! As a result of my wonderful experience, I feel strongly that the Ohana must continue their work so others may receive details about their descendants. In addition to their research, the Ohana has implemented programs to reach out to Kalaupapa family members and educate the public. The Ohana consists of people directly connected with the settlement, Kalaupapa residents, relatives, and friends. In addition, eight of the directors are Native Hawaiian which is appropriate due to the high number of Hawaiians who lived and died at Kalaupapa. The directors are people who have a personal interest in Kalaupapa like me and many others. If I have a vote, I chose Ka'Ohana O Kalaupapa to continue their specialized research.

Valerie coordinated a Kalaupapa visit for me and my husband. She patiently drove us from cemetery to cemetery in search of my great-grandmother's grave. Unfortunately we were not successful, but I truly appreciate her efforts. I can imagine the number of times Val searched the cemeteries with other family members. We met Boogie (Clarence) Kahilihiwa,

President of the 'Ohana and his wife Ivy. Boogie picked us up at the airport and gave us our initial mini Kalaupapa tour. As we flew out at the end of our visit, Boogie and Ivy were there to see everyone off. I expected to feel like an outsider at Kalaupapa, but we were treated like family.

Since my introduction to the Ohana I have been a strong believer in the importance of their work. In addition to having spent years developing research skills needed to successfully search Kalaupapa's records, the Ohana has spent more than 20 years planning a memorial which will include thousands of names of Kalaupapa patients. In comparison to the number of patients who died at Kalaupapa, the number of remaining marked graves are few. I look forward to revisiting Kalaupapa some day to see my great-grandmother's name.

Seeing Kalaupapa as it is today was a wonderful experience. As I admired the beauty, I wondered if my great-grandmother and other patients of the settlement appreciated the beauty beyond their misery of poor health and isolation. There have been recent discussions of plans for Kalaupapa's future, but there has been little mention of Ka 'Ohana O Kalaupapa. Focus should be on preserving Kalaupapa and the continuance of the Ohana's research and programs. The Ohana must be a long term partner in all plans for Kalaupapa's future. Kalaupapa should not be turned into a national park in the traditional sense, but should continue to be a place of reflection. Visits should be about the many people who were sent to the settlement against their will, leaving behind loved ones and giving away children born there. Their suffering and loneliness must not be forgotten. Visiting Kalaupapa should be about understanding the past, not changing the future. The number of visitors should be monitored to prevent a change in the atmosphere and family members should not be considered visitors.

Hopefully the NPS will consider these issues before making future plans.



[REDACTED]
KALA GMP, NPS <kala_gmp@nps.gov>

Comments on Kalaupapa NHP Master Plan

1 message

Alton.K.Miyasaka@hawaii.gov <Alton.K.Miyasaka@hawaii.gov>

Tue, Jun 2, 2015 at 9:18 PM

To: KALA_GMP@nps.gov

Please find attached the comments from the State of Hawaii, Department of Land and Natural Resources, Division of Aquatic Resources. Thank you for this opportunity to provide our comments.

Alton Miyasaka



DAR comments to NPA final all.pdf

186K

Kalaupapa National Historical Park

Draft General Management Plan | Environmental Impact Statement
Newsletter #4 | Spring 2015



Comment Form

The National Park Service invites you to share your comments and concerns regarding the *Kalaupapa National Historical Park Draft General Management Plan and Environmental Impact Statement (GMP/EIS)*. Comments may be submitted in several ways, including via this postage-paid comment form. Other ways to submit comments are:

Online: <http://parkplanning.nps.gov/kala>

E-mail: KALA_GMP@nps.gov

Mail: National Park Service, Attn: Kalaupapa NHP GMP/EIS, 909 First Avenue, Suite 500, Seattle, WA 98104

Please submit comments by June 8, 2015 or 60 days from the date the EPA notice of filing and release of the draft GMP/EIS is published in the *Federal Register*, whichever is later.

The draft GMP/EIS contains four distinct alternatives for the future management of Kalaupapa NHP. Alternative C has been identified as the NPS preferred alternative. In the space provided below, please tell us if you agree with the preferred alternative, prefer another alternative, or prefer specific elements of any of the other alternatives. You may also provide comments on other sections and elements of the draft GMP/EIS. We hope that you take the time to read and comment on the draft GMP/EIS. Your input is important to us.

Please see attached

You may use the space at the back of this form or a separate sheet of paper to share other thoughts or ideas. ➡

- ☒ I would like to be placed on Kalaupapa's e-mail list.
- ☐ I would like to be placed on Kalaupapa's mailing list.
- ☐ I would like to be taken off the mailing list.
- ☐ The address you have is incorrect. Please change it to the following:

Name: Alton Miyasaka, Hawaii

E-mail (required for e-mail list only): alton.k.miyasaka@hawaii.gov

Address: Division Aquatic Resources; 1151 Punchbowl St Rm 330

City, State, Zip: Honolulu, HI 96813

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you can ask us to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

DAVID Y. IGE
GOVERNOR OF HAWAII



SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

KEKOA KALUHIWA
FIRST DEPUTY

W. ROY HARDY
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

June 2, 2015

Ms. Anna Tamura, Project Manager
National Park Service
Attn: Kalaupapa NHP GMP/EIS
909 First Avenue, Suite 500
Seattle, WA 98104

Dear Ms. Tamura:

The Division of Aquatic Resources (DAR) has reviewed the proposed general management plan and environmental impact statement (GMP/EIS) for the Kalaupapa National Historic Park (NHP) on Molokai, Hawaii and offers herein our comments.

DAR generally supports the intents and purposes of the GMP/EIS to plan for the future of the settlement once the last patient no longer lives on the property. We will focus our comments on the section in the GMP/EIS that discusses the alternatives for addressing impacts on fishing and gathering (pages 275-277). The document states that existing Hawaii Department of Health (DOH) regulations that govern the taking of marine resources would continue in the short term. It is our understanding that once the last patient no longer resides in the settlement, DOH intends to withdraw from the site and presumably, the fishing regulations would also be withdrawn.

The original purpose of the DOH fishing restrictions was to benefit the resident patient community. This purpose would no longer be justified after the patient community is gone, so we would be very interested in beginning a discussion with the National Park Service (NPS) to plan for this eventuality. In particular, we would appreciate some consideration for the Department of Land and Natural Resources (DLNR) to assume from the DOH, the State regulatory management of the ocean waters of the Kalaupapa NHP.

The GMP/EIS provides only a very cursory discussion on the status of the marine resources in the area, the presence of any aquatic alien species, and the future research or management needs/goals of the NHP for the nearshore waters. We would appreciate receiving any information NHP may have on these matters.

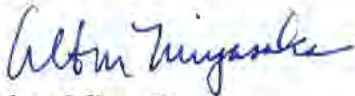
We recommend that the document include a discussion on a range of alternatives for management of the nearshore waters. The range may include, but is not limited to, alternatives where 1) DLNR assumes full regulatory management of the NHP waters, 2) DLNR and NPS share regulatory

management, or 3) NPS assumes full regulatory management. A detailed discussion on what resources and assets NPS might be able to provide under the different alternatives would be useful in informing the alternatives analysis.

Lastly, we note that the document states a number of times “the recovery of the fish populations within the area” in the Cumulative Impacts section. We would be interested in better understanding what “recovery” is being implied or needed given the populations are currently under very strict take controls and presumably in a nearly unfished status. What are the populations being recovered from (what factors caused the perceived resource decline) and what is the condition that the populations would be recovered to (what would a recovered population look like)?

Thank you for this opportunity to provide our comments. Should you have any further questions, please contact me at 808-587-0092 or at alton.k.miyasaka@hawaii.gov.

Sincerely,

A handwritten signature in blue ink that reads "Alton Miyasaka". The signature is fluid and cursive, with the first name "Alton" being more prominent than the last name "Miyasaka".

Alton Miyasaka
DAR Acting Administrator



KALA GMP, NPS <kala_gmp@nps.gov>

Comments on management plan for Kalaupapa

1 message

Heather Diamond <curator@iolanipalace.org>

Wed, Jun 3, 2015 at 5:39 PM

To: KALA_GMP@nps.gov

Cc: valerie monson <vmonson@kalaupapaohana.org>

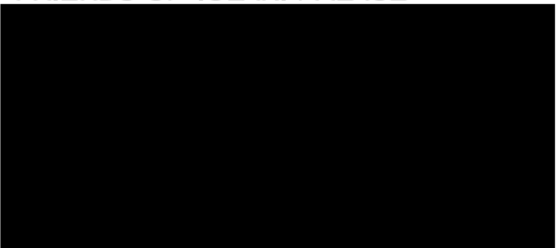
Aloha,

After reading your impressive Draft General Management Plan for Kalaupapa National Historic Park, I am writing to encourage NPS to include Ka `Ohana O Kalaupapa as a long term partner.

We were privileged to work with Ka `Ohana O Kalaupapa in 2012-13 when Iolani Palace hosted "A Source of Light, Constant and Never Fading: the Relationship Between the People of Kalaupapa and Hawaii's Royal Family" for 18 months in the basement galleries of the Palace. In addition to educating visitors from around the world, this exceptionally well-researched and executed exhibit was the centerpiece for teacher workshops and a catalyst for family gatherings and story sharing. Ka `Ohana O Kalaupapa impressed me as being professional, dedicated, and knowledgeable. Their work touched many people while it was on display, and I am sure that it continues to touch others as it moves to new locations.

Clearly this organization knows and cares about the people of Kalaupapa and has earned their trust. To best insure that the voices of these families and individuals are heard and sensitively represented, i believe that Ka `Ohana O Kalaupapa should be included in all NPS planning and program development.

Best,
Heather Diamond, Ph.D
Curator
FRIENDS OF 'IOLANI PALACE





KALA GMP, NPS <kala_gmp@nps.gov>

TNC's Response to Draft GMP/EIS

1 message

Jody L. Kaulukukui <jkaulukukui@tnc.org>
To: "KALA_GMP@nps.gov" <KALA_GMP@nps.gov>
Cc: Ed Misaki <emisaki@tnc.org>

Wed, Jun 3, 2015 at 7:10 PM

Aloha Superintendent Espaniola,

We received the Kalaupapa National Historic Park Draft General Management Plan and Environmental Impact Statement. Attached please find The Nature Conservancy's response. Thank you for the opportunity to comment.

Jody Kaulukukui

Jody L. Kaulukukui
Director of Land Protection

jkaulukukui@tnc.org
(808) 587-6233 (direct)
(808) 545-2019 (fax)

nature.org/hawaii



**The Nature Co
Hawaii'i Progr**

923 Nu'uuanu Av
Honolulu, HI 96
(808) 537-4508



Ltr to NPS 6.1.2015 re Kalaupapa GMP-EIS.pdf
93K

June 1, 2015

Ms. Erika Stein Espaniola
Superintendent
Kalaupapa National Historical Park
P.O. Box 2222
Kalaupapa, Hawai'i 96742
Also sent via email to KALA_GMP@nps.gov

*Re: Kalaupapa National Historic Park Draft General Management Plan and
Environmental Impact Statement*

Dear Ms. Espaniola:

The Nature Conservancy ("TNC") has reviewed the *Kalaupapa National Historic Park Draft General Management Plan and Environmental Impact Statement* ("Draft GMP/EIS"). This responds to your call for comments, which are due June 8, 2015.

The Draft GMP/EIS presents four alternatives for future management of Kalaupapa, and Alternatives B and C specifically provide for boundary expansion and acquisition or other management of TNC's Pelekunu Preserve. As you know, TNC owns only a fractional interest in approximately 5,759 acres in Pelekunu valley. We understand the NPS is not able to purchase a partial interest of Pelekunu at this time, without a Department of Justice, U.S. Attorney General legal opinion and/or waiver. As it stands, some of the other owners of the undivided interest at Pelekunu are interested in selling their interest while others may not be agreeable at this time. If all landowners agree, or a partial interest sale is approved, any future sale to NPS of TNC's partial interest would be contingent on mutually agreeable terms and after a process that engages the community and allows for their input. If such a sale is completed, TNC intends to establish a fund for forest stewardship for East Molokai biodiversity conservation that could include Pelekunu valley.

As an alternative, TNC may consider allowing NPS to manage archaeological and/or cultural resources in Pelekunu so that these important historical treasures can be protected. If you have any questions or require additional information, please contact me at (808) 587-6233.

Sincerely,



Mark Fox
Acting Director

The Nature Conservancy, Hawai'i Chapter

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[REDACTED]
KALA GMP, NPS <kala_gmp@nps.gov>

hewa!

1 message

Mimi Forsyth <[REDACTED]>
To: KALA_GMP@nps.gov

Wed, Jun 3, 2015 at 10:13 PM

It would so very wrong on so many levels to turn Kalaupapa into a tourist playground. It would also be a kick in the teeth to family members and descendants of those who were exiled there, suffered, died, and are buried there. Let it remain as it is, in memoriam.

Diocese of Honolulu • Office of the Bishop • www.catholichawaii.org
1184 Bishop Street, Honolulu, HI 96813-2859 • 808.585.3347 • bishop@rcchawaii.org



June 3, 2015

National Park Service
Attention: Kalaupapa NHP GMP/EIS
909 First Avenue, Suite 500
Seattle, WA 98104
[Sent via email to: KALA_GMP@nps.gov]

Dear Sir or Madam:

Thank you for the opportunity to comment on the proposed General Management Plan (GMP) for the Kalaupapa National Historical Park (KNHP).

It is a massive document, and I appreciate all the work that has gone into it, all the information it provides, and all the analyses of the issues.

I especially appreciate the frequent and forthright references to the sacredness of the place, its mana, its spirit and, as the law provides, the need to preserve and interpret it for the education and inspiration of present and future generations.

In general, I agree with the selection of Alternative C. I especially appreciate some of the provisions for visitors:

- Dropping the prohibition on visitors under the age of 16, when there are no resident patients left, or when the patients and the Department of Health agree.
- Establishing an orientation and entry pass system.
- Allowing visitors who have been oriented and issued an entry pass to go unescorted to Kalawao and other places.
- Raising the 100 visitors per day limit, although keeping appropriate limits as determined from time to time.
- Having days for unlimited use for special events. I believe more than 100 people attended the St. Damien and St. Marianne canonization events, and that more than 400 people attended the 100th anniversary of St. Damien's death in 1989. This proposal would allow for such special events.
- Allowing for overnight use of visiting groups. I think specifically of retreat groups, and the plan mentions the possibility of using Bishop Home for such purposes. It also cites the provisions of the agreement with the Hawaii Conference Foundation for the use of Wilcox Parish Hall for up to 15 persons to participate in retreats. I would suggest however that retreat groups would not necessarily have to be housed overnight all in one place.

I recommend that the GMP specifically provide that the existing rectories for the Catholic, Protestant and Mormon churches continue to be made available to the respective churches so that

ministers of religion, whether full or part-time, will have housing from which to serve residents and visitors alike. Incidentally, we fully expect to have a resident priest there into the foreseeable future.

Ka `Ohana O Kalaupapa should be specifically cited and listed as one of the Park's partners, and a long-term cooperative agreement established, as has been done with the other partners listed.

The plan should more specifically address the accomplishments and the continuing role of Ka `Ohana O Kalaupapa. This should include, but not be limited to, the `Ohana's establishment of the Kalaupapa Memorial. (Incidentally, the names of two Roman Catholic priests and that of my great-grandfather and great-aunt will be on the memorial).

I am uncertain about the proposal to expand the boundaries to include certain north shore lands all the way to Halawa valley, either as part of the KNHP itself or as a national preserve managed by the KNHP. As established by law, the two main purposes of the KNHP are specifically stated as preserving and protecting Kalaupapa, and providing a well-maintained community for the patients. I wonder if this expansion comports with those purposes, or if the functions of the Park would be diluted by this addition. Perhaps this proposal could be studied and discussed further before it is incorporated into the plan.

Thank you again for the opportunity to comment.

Sincerely yours,

A handwritten signature in black ink that reads "Larry Silva". The signature is written in a cursive, flowing style.

Most Reverend Larry Silva
Bishop of Honolulu (Roman Catholic Church in the State of Hawaii)

Cc: Erika Stein Espaniola, Superintendent, KNHP



KALA GMP, NPS <kala_gmp@nps.gov>

Testimony Regarding The Kalaupapa GMP/EIS

1 message

Bruce Doneux <[REDACTED]>
To: KALA_GMP@nps.gov

Thu, Jun 4, 2015 at 11:06 AM

I wish to submit the attached testimony to the National Park Service, Kalaupapa NHP GMP/EIS. If there are any questions or requests, please email me or write to my enclosed mailing address.
Thank you.
Bruce Doneux



Dear Kalaupapa NPS Representatives Letter.docx
141K

Dear Kalaupapa National Historical Park Representatives:

I am submitting this testimony regarding the draft of the General Management Plan and Environmental Impact Statement:

My name is Bruce Doneux and I am presently living in Pacific Grove, California. First, I would like to give you a brief overview of my involvement with the Kalaupapa Leprosy Settlement and its residents.

I went to Kalaupapa for the first time in the summer of 1974 to work as a volunteer nursing assistant in the treatment room of the "old" hospital (the one built in the early 1930's). There were over 150 patient residents still living there at the time.

I returned for a second summer in 1975 to again work in the treatment room. After volunteering for a second time I returned to the mainland to attend graduate school.

In 1980, I returned to Kalaupapa and lived there for three-and-a-half years. For the first two years, I again worked in the treatment room in the "new" hospital. I mention my work in the hospital treatment room because, along with the many hours of "talking story" with residents in the community, I also listened for many, many hours in the treatment room as patients recounted a "golden history lesson" of the life of the community and its people.

For the last two years I lived at the Settlement, I worked on an historical collection project related to the history of Kalaupapa. Besides collecting various materials around the settlement and storing them in the old jail, I also built up a small archive of historic photos, researched and organized a bibliography of materials and records of the history, and began a Settlement historical society. I also gave numerous presentations on the history of the Settlement. After finishing my project I spent the next one-and-a-half years in Honolulu directly involved in working with the Hale Mohalu Ohana regarding patient rights. In 1989, I consulted on a Kalaupapa documentary and accompanied the documentary team to Belgium to assist in the production.

In 1996, I participated in the workshop, organized by Bernard Punikaia, Anwei Skinsnes, Dean Alexander, and Valerie Monson that initiated the idea of the formation of the Ka 'Ohana O Kalaupapa in 2003.

I wish to include this short explanation of my connection to Kalaupapa because I am but one of numerous individuals in the Ohana who have extensive knowledge of and experience with the history of the community and the residents.

Indeed, there are non-patient/non-family individuals in the Ohana who have been involved with the Settlement longer than I have; who have been involved with Kalaupapa since the days when the mood, atmosphere and activity level

reflected more the lives of the patients than the kokuas; who have nurtured deep and lasting friendships with patients; who have not only spent untold hours listening to residents' life stories but who have supported patients in telling their own life stories; who have worked as kokuas and advocates for patients; who have worked directly on projects, stories, etc. related to the Kalaupapa history; who have developed an expertise, more than any other non-patients, in the history and legacy of the community and its people, as well as the impact of the disease on the state and the country; who have been motivated by their passion rather than profit or occupation in becoming involved with the Settlement; who continue to volunteer their time and energy to preserve the history and legacy of the disease and the people who have been affected by it; who have worked very, very hard to counter the mainstream media's biased portrayal of patients that have tended to perpetuate stereotypes of people with the disease; who continue to support the remaining patients and their loved ones in giving voice to their collective stories and to support patient leadership in the Ohana itself; who have created and maintained educational programs designed to inform the public, in an accurate and respectful manner, the knowledge of the experiences and legacy of the patients.

I can't imagine there are any NPS representatives with as much experience and expertise as some of the members of the Ohana, most obviously the patient members themselves.

On the basis of the above points and the established importance of the Ohana to the Historic Park, I wish to see the Ohana included in the GMP of the National Park Service as a long-term partner. It only makes sense to have a collaborative rather than competitive effort between the NPS and the Ohana, particularly since the Ohana as already developed and implemented programs to do educational outreach to schools and the general public, has reached out to family members, and has developed public presentations promoting the history and legacy of Kalaupapa and its people.

I also support the Kalaupapa Memorial as a project collectively promoted by the NPS and the Ohana and as an integral part of the GMP. The Ohana has spent years in designing and implementing a practical proposal for creating such a memorial. In addition, I think it is important and appropriate that kapuna, family members and Ohana members be allowed to fill vacancies on the Kalaupapa National Historical Park Advisory Commission. Lastly, I do support the Ohana's recommendation that there be a set number of daily visitors, determined with community input. Having lived at Kalaupapa, I do remember the quiet and respectful atmosphere I felt when there were strict limitations on the number of outside visitors.

I should like to finish by saying how much I appreciate all the NPS has done for Kalaupapa and its people. I think there has been a sincere effort on the part of the Park Service to respect, honor, and preserve the legacy of patients for almost four decades. The physical preservation of buildings, the clearing of so much of the peninsula overgrowth, and the clearing and preservation of the cemeteries has been exemplary. I love the fact the NPS has built an archival/preservation

storage facility at the Settlement. I always hoped the materials and objects I had collected in the early 1980's could eventually be retained in just such a facility.

I hope the NPS agrees to work with Ka 'Ohana O Kalaupapa and establish a productive and enriching partnership that continues to preserve the spirit and legacy of Kalaupapa and its people. Thank you.

Sincerely,

Bruce Doneux





KALA GMP, NPS <kala_gmp@nps.gov>

Fwd: Continued Section 106 Consultation on Kalaupapa GMP

1 message

Tamura, Anna <anna_tamura@nps.gov>
To: NPS KALA GMP <kala_gmp@nps.gov>

Mon, Jul 6, 2015 at 5:25 PM

Public Comment from Karen Poepoe

----- Forwarded message -----

From: **Mardorf, Carrie** <carrie_mardorf@nps.gov>
Date: Mon, Jun 29, 2015 at 10:18 AM
Subject: Fwd: Continued Section 106 Consultation on Kalaupapa GMP
To: Erika Stein Espaniola <erika_stein@nps.gov>, Anna Tamura <anna_tamura@nps.gov>

Forwarding to you for the GMP record.

Regards,

Carrie A. Mardorf
Cultural Resources Program Manager
Kalaupapa National Historical Park
P.O. Box 2222
Kalaupapa, HI 96742
p: 808-567-6802, ext. 1700
f: 808-567-6729

----- Forwarded message -----

From: **Karen Poepoe** <[REDACTED]>
Date: Sun, Jun 28, 2015 at 10:09 AM
Subject: Re: Continued Section 106 Consultation on Kalaupapa GMP
To: "Mardorf, Carrie" <carrie_mardorf@nps.gov>
[REDACTED]

Aloha Carrie,

I'll be going to the Waikolu Fencing meeting that James is presenting at the same time as the call, which I understand will mainly be about setting the schedule and topics for future discussions, correct? I'm never great with conference calls, they are so limiting, so may I just say this to add to your call discussion:

- Daytime meetings are sometimes hard to get to, so I like that the NPS folks do additional evening meetings when coming topside.
 - I'm fine with any meeting structure, but suggest the round table breakouts with smaller groups discussing identified topics to start with. Topsiders often won't be forthcoming in whole group discussions but are more comfortable with small groups settings. Add to this a facilitator and review all comments together as a larger group for the outcome.
 - Topics that answer my questions will be-
1. Why the whole larger area expansion (Pelekunu, Halawa, etc.,) when we are talking about Kalaupapa? This is still unclear to me. The Kalaupapa settlement has been identified as the NHRP, not the other areas under consideration. I'm concerned about these proposed expanded areas that have the potential to be developed in the future, once declared as the part of the whole NPS lease.
 2. Need for more thorough inventories, including pre-settlement aspects. There would be adverse effects still

unknown without a more thorough knowledge of the identified areas.

3. The DHHL presence as a partner to NPS: can we get more definition as to their role as landholders for the Hawaiian people, so that there is a better understanding of how to move forward?
4. I am in support of Kalaupapa proper (the archipelago) being dedicated to the memory of patients and their histories. Just don't want to see Waikiki there. I trust that the 'ohana and their associated families as well as the residents of the Kalaupapa 'ahupua'a can make an appropriate recommendation at this time regarding usage and management of that identified area.
5. What alternative plans are in being considered/ offered as potential models for management under the NPS GMP, such as traditional 'ahupua'a and cultural centers?
6. The 'Aha Kiolo o Moloka'i would like to be consulted in any proposed undertaking in regard to the general plan. Are we needing to register somewhere as a native Hawaiian group (NHO) in order to make suggestions and/or recommendations for this 106 process? We promote traditional cultural preservation as a major part of our mission.

Thank you, Carrie.

On Mon, Jun 8, 2015 at 2:33 PM, Mardorf, Carrie <carrie_mardorf@nps.gov> wrote:

Aloha!

Thank you for participating in the Kalaupapa National Historical Park (NHP) draft General Management Plan (GMP) public meetings and expressing interest in continued Section 106 consultation. The National Park Service plans to continue Section 106 consultation on the draft GMP over the next several months. This email serves as an invitation to join us in these discussions about historic properties and any effects the draft GMP may have.

Our first Section 106 consultation conference call is being planned for late June. A Doodle poll will be sent out in a separate email to see when the most people are available for a conference call. Please respond to the Doodle poll with your availability if you are interested in participating.

If you are no longer interested in participating in additional Section 106 consultation, please let us know, so we can remove you from the list. Please also forward this email to others who may be interested and let us know so we can include them on forthcoming emails.

The first call will set the structure and a rough schedule for future discussions and topics to be discussed. Kalaupapa also plans to continue these calls after the GMP as a regular vehicle to update our consulting parties and partners on park projects. We hope to engage with you during this process to capture your thoughts and concerns related to Section 106. We look forward to the discussion. Mahalo!

Regards,

Carrie A. Mardorf
Cultural Resources Program Manager
Kalaupapa National Historical Park
P.O. Box 2222
Kalaupapa, HI 96742
p: 808-567-6802, ext. 1700
f: 808-567-6729

—
Anna Tamura
Landscape Architect
National Park Service
Pacific West Region, Park Planning and Environmental Compliance
909 First Avenue, Seattle, WA 98104-1060
(206)220-4157



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

June 5, 2015

Erika Stein Espaniola, Superintendent
Kalaupapa National Historical Park
Attn: DEIS--GMP
P.O. Box 2222
Kalaupapa, HI 96742

Subject: Draft Environmental Impact Statement/General Management Plan, for the
Kalaupapa National Historical Park Project, Hawaii. (CEQ# 20150096).

Dear Ms. Espaniola:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Kalaupapa National Historical Park Project, Hawaii. Our review is provided pursuant to the National Environmental Policy Act, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

EPA supports the National Park Service's goals of protecting fundamental resources, such as marine, terrestrial, cultural and archeological assets. Based on our review of the Draft EIS, we have rated the proposed project as *Lack of Objections* (LO). Please see the enclosed *Summary of EPA Rating Definitions*. Our rating is based on the Preferred Alternative C, which promotes preservation of Kalaupapa's natural character and historical significance.

We applaud the National Park Service's commitment to smart growth and green building, such as Leadership in Energy and Environmental Design. At this general management planning stage, the Kalaupapa National Historical Park has an excellent opportunity to incorporate sustainability into its decision making.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released, please send one hard copy and one CD to the address above (mail code: ENF-4-2). If you have any questions, please contact me at (415) 972-3521, or have your staff contact James Munson, the lead reviewer for this project. James can be reached at (415) 972-3852 or Munson.James@epa.gov.

Sincerely,

James Munson for:

Kathleen Martyn Goforth, Manager
Environmental Review Section

Enclosure: Summary of the EPA Rating System

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment



KALA GMP, NPS <kala_gmp@nps.gov>

Comment Letter on Kalaupapa Plan

1 message

Onaona Maly <[REDACTED]>

Sat, Jun 6, 2015 at 2:29 PM

Reply-To: [REDACTED]

To: National Park Service <kala_gmp@nps.gov>

Cc: [REDACTED]

Aloha,

Please find attached our letter regarding the NPS plan for Kalaupapa National Historic Site.

Mahalo,

Kamakaonaona & Kepa Maly

2015_06_06_Kalaupapa_Ohana (1).pdf
90K

June 6, 2015

National Park Service,
Attn: Kalaupapa NHP GMP/EIS
909 First Avenue, Suite 500
Seattle, WA 98104

Aloha mai kākou,

Eia ho'i māua ma Lāna'i nei me ka ha'aha'a o ke aloha, nā pulapula o Kahoe kā a me Māhoe mā, he mau po'e i luhi 'ia me ka ma'i ho'oka'awale (lepera) i kēlā mau makahiki i hala. Ke kāko'o nei no māua a me ko māua 'ohana mākua, po'e keiki, po'e mo'opuna, a me ka 'ohana a'e i na lālā o Ka 'Ohana o Kalaupapa a me ko lākou ilina ma Kalaupapa NHP. O ka mo'olelo ho'oniua pu'uwai o ka 'anemoku o Kalawao me Kalaupapa, 'oia ho'i ka mo'olelo o nā mea ka'awale a i kāpae 'ia ma kēlā 'āina mehameha, a me ko lākou ho'omau 'ana; 'oia ka mo'olelo nui o kēia Paka Aupuni.

lā 'oukou, e ka po'e mālama i kēia Paka Aupuni, maika'i ko 'oukou mana'o a he mea ko'iko'i 'ia, akā a'ole na'e 'ia ko 'oukou mo'olelo. O ke kuleana nui a 'oukou, 'oia ka hana like pū a kāko'o nei i ka 'ike mo'olelo o nā mea ka'awale a me ko lākou mau pulapula. Ma laila ka waiwai nui a me ke ola mau o ka mo'olelo o kēlā mau lā pōuli o ko Hawai'i Pae 'Āina; ma laila ka hana nui o ka Paka Aupuni ma Kalaupapa. No ka 'ohana ka pono o ka wehewehe 'ana o ko lākou mau lā e luhi ai. A na 'oukou ke kuleana e kāko'o iā lākou.

Ma kona maopopo 'ana o ka hana kāko'o a ka Mō'īwahine o Lili'uokalani, Ua ha'i mai ko māua kupuna 'ohana 'o Kahoe kā (he mea i ka'awale aku ma Kalaupapa), "Akāhi a lana mai ka mana'o, ua ola makou..." 'Oia nō ko māua mana'olana, e ho'oponopono 'oukou i ka 'oukou Palapala Kuhikuhi no ka mua aku o Kalaupapa a me ko laila 'ohana. Inā e ka'awale no 'oukou i Ka 'Ohana o Kalaupapa, a'ohe pono ka 'oukou hana. Akā inā e hana like, e mōhala no ka hana a e holo mua.

Ua ha'i mai nā kūpuna, "Maika'i ka hana o ka lima, 'ono no ka 'ai o ka waha!" O ka hana maika'i ma Kalaupapa NHP ka mea nui no nā hānauna o ka wā i hala a me ka mua aku.

Me ke aloha, a me ka mana'olana no ka hana pono no ka 'āina a me ka ho'oilina o ua 'āina la.

(Translation)

Aloha,

We two are here on Lāna'i with humble aloha, descendants of Kahoe kā and Māhoe, who were among the people burdened with the separating disease (leprosy), in those years past. We, along with our elder family, children, grandchildren, and extended family support the members of Ka 'Ohana o Kalaupapa, and their legacy in the future of Kalaupapa NHS. The heart-stirring history of those dark days of the Kalawao-Kalaupapa Peninsula and environs is really about those who were cast aside on that isolated land, and who persevered; that is the primary history of this

National Park.

To you, who are charged with operation of the National Park, your thoughts are good, and important, but the history is not yours. Your responsibility is to work together and support knowledge of the history of those who were set aside, and of their descendants. That is the great wealth and enduring legacy of those dark days in the Hawaiian Islands; therein is the important work of the National Park at Kalaupapa. The right of telling the story of those heavy days belongs to the families. And yours is the responsibility of supporting them.

Knowing of the efforts of Queen Lili'uokalani on their behalf, our elder relative of the Kahoekā line (one who was cast aside at Kalaupapa) said "There are now thoughts of hope, that we will have life..." That is our hope, that you will set right the Plan for the future of Kalaupapa and the families there. If you cast off Ka 'Ohana o Kalaupapa your work will not be right. But if you work together with them, the work will blossom and progress.

Our elders taught us, "When the hands do good work, the mouth has good food to eat!" Good work at Kalaupapa NHS is important for past generations and for the future.

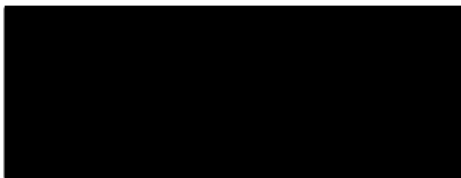
With aloha and hope that good be accomplished for the land and the legacy of that land.

Kamakaonaona Pomroy Maly

Kamakaonaona Pomroy Maly

Kepa Maly

Kepa Maly



Comment Form

Park: Kalaupapa National Historical Park

Project: Kalaupapa NHP General Management Plan and EIS (ID: 24883)

Document: 1. Draft General Management Plan and Environmental Impact Statement (ID: 65195)

* indicates required fields

City: *

Postal Code:*

First Name:

KIRTLAND

Middle Initial:

C

Last Name:

PETERSON

Organization:

Member

Official Representative

Address 1:

Address 2:

Country:

E-mail:

Keep my contact information private

Comments or Requests:

Comment regarding:

Park: Kalaupapa National Historical Park
Project: Kalaupapa NHP General Management Plan and EIS (ID: 24883)
Document: 1. Draft General Management Plan and Environmental Impact Statement (ID: 65195)

Aloha,

Many thanks to the NPS for soliciting and promising to read/consider comments from the public.

In these budget-tight times, Kalaupapa National Historical Park needs to pay for itself. That said, much will be lost with an in-the-box, budget-narrow perspective.

Kalaupapa is an immensely valuable, one-of-a-kind, finely spun glass artifact. If dropped while looking for the price tag, it can never be restored.

Haste lays waste.

Dr. Kirtland C. Peterson
Kalaupapa volunteer

Comments in pages that follow:

1. Think Different, Do Different
2. Haste Lays Waste & May Stoke Unnecessary Resentment
— with photographs (no page numbers)
3. Who Owns What? What Might Happen After the Lease Expires?
4. Thinking Outside of the Park Box
5. Next Steps

Comments continue next page.

1. Think Different, Do Different

In conversations I've had about Kalaupapa's future, these responses to creative ideas are common:

- "The NPS can't do that"
- "It's a federal agency, they have to follow federal guidelines"
- "That's a good idea but... NPS planners aren't allowed to do that"
- "The plan can't incorporate that, this is federal"

Already there's a problem with Plan C — and with Plans A, B & D. Many important, relevant, and creative ideas cannot be part of the discussion.

The result is clear: An NPS plan that does not consider or include important data.

Kalaupapa is unique. Kalaupapa does not — *will not* — fit into standard "park" and "federal" processes.

If the NPS had to consider the future of the Auschwitz-Birkenau (German Nazi Concentration and Extermination Camp), it's hard to imagine it would proceed as if Auschwitz-Birkenau was a part of a "standard" park future process. *A person or persons with the necessary sensitivities, wisdom and authority would find a way to proceed in a manner fitting to the location under consideration.*

Kalaupapa has been described as a graveyard.

Kalaupapa is the site of untold human suffering.

Kalaupapa is not a park like Yellowstone or Bryce Canyon.

Kalaupapa must be considered as more similar to a location like Auschwitz-Birkenau.

With that thought in mind...

A person or persons with the necessary sensitivities, wisdom and authority must find a way to proceed in a manner fitting to the location under consideration.

"We MUST do it the standard NPS / federal way" will not work. The glass will shatter.

2. Haste Lays Waste & May Stoke Unnecessary Resentment

Before any consequential decisions are made about Kalaupapa, any and all decision makers should:

- (a) Experience the Kalaupapa Hansen's Disease Settlement for several days and nights, and
- (b) Sit with and listen to all parties personally touched by the forced involuntary separation of families and isolation of individuals on the Kalaupapa peninsula, including
- (c) Descendents of native Hawaiians forced to relocate due to the establishment of the Hansen's disease settlement

The story of Kalaupapa should be widely known. But it is not, even in Hawai'i.

Thus, any and all ID 24883 & 65195 decision makers should personally experience key aspects of the Kalaupapa story *before* making any substantive decision about the future of Kalaupapa.

This is particularly true for any mainland decision makers and Hawai'i-based decision makers who have never visited Moloka'i, let alone the Kalaupapa station and peninsula.

Kalaupapa and its history cannot be fully appreciated through print, photographs, or video. To believe they can be understood without direct experience is folly.

Without a personal, on-site appreciation of Kalaupapa, decision makers cannot even begin to understand the perspective and feelings of those whose families were directly impacted by forced relocation, the forced removal of residents' children from the settlement, etc.

Without a personal, on-site appreciation of Kalaupapa, decision makers can only make uninformed, potentially immoral decisions.

Comments continue next page.

2. Haste Lays Waste & May Stoke Unnecessary Resentment

(a) Any/all decision makers should experience the many aspects of Kalaupapa for several days and nights

(i) *Hike In*

To (begin to) experience both the historical and current isolation of Kalaupapa, decision-makers should hike down the sea-cliff trail. The trek is not as arduous as some report.

Hiking in will also give decision makers firsthand experience of the beauty.

Questions a decision maker might ask him/herself:

- Do I want the profound reality of isolation to be preserved for future generations?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on the experience of isolation?
- Do I want to preserve the untouched beauty of Kalaupapa?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on that untouched beauty?

1 page of photographs follows this page.

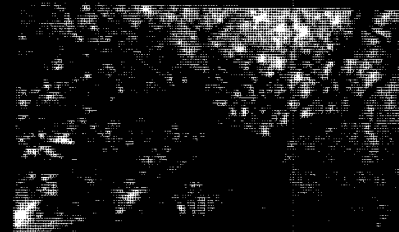
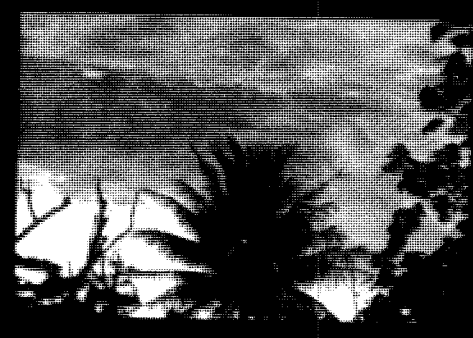
Comments continue after photographs.

All decision-makers should hike into Kalaupapa before making any consequential decision. Experience the isolation and beauty.



STOP WARNING
GO BACK UNLESS YOU HAVE
WRITTEN PERMIT
TO ENTER KALAWAO COUNTY
VIOLATORS OF HRS 326-26
SUBJECT TO CITATION
AND \$500.00 FINE

March 2015



2. Haste Lays Waste & May Stoke Unnecessary Resentment

(a) Any/all decision makers should experience the many aspects of Kalaupapa for several days and nights

(ii) *Stay A While*

To (begin to) experience the spirit and soul of the Kalaupapa Hansen's Disease Settlement, decision makers should leave their laptops and smartphones at home and spend several days and nights in the community.

Decision makers should ask for informed guides — guides such as Miki'ala and Keoko — to best learn the stories of the community, the land, and the original inhabitants.

While staying in the community, decision makers should watch *The Soul of Kalaupapa: Voices in Exile* in the theater at Paschoal Hall.

The Soul of Kalaupapa is also available online at:

<http://www.byutv.org/watch/5f63953e-de11-457b-99b7-c07b73eb084b>

However, the experience of viewing *The Soul of Kalaupapa: Voices in Exile* while on the peninsula in no way matches the experience of watching it while staying on site.

Questions a decision maker might ask him/herself:

- Do I want the spirit and soul of Kalaupapa to be preserved for future generations?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on that experience of spirit and soul?
- Do I want to preserve the powerful history of Kalaupapa?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on communicating that history?

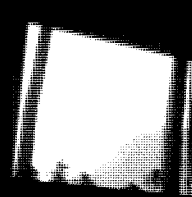
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Comments continue after photographs.

THE SOUL OF KALAUPAPA
voices of exile

PLAY FILM

All decision-makers should spend several days and nights in the community before making any consequential decisions. Experience the spirit and soul of Kalaupapa.



March 2015

2. Haste Lays Waste & May Stoke Unnecessary Resentment

(a) Any/all decision makers should experience the many aspects of Kalaupapa for several days and nights

(iii) Visit Graveyards & Protected Beaches

While staying at Kalaupapa, decision makers should walk the graveyards and protected beaches.

Spend some quiet time in the graveyards.

Walk the protected beaches. If lucky enough to come across a mother monk seal with her pup, pause a while to watch them play.

Brave decision makers might snorkel Kalaupapa landing when the whales are in. Sink beneath the water — and they may hear whalesong.

Questions a decision maker might ask him/herself:

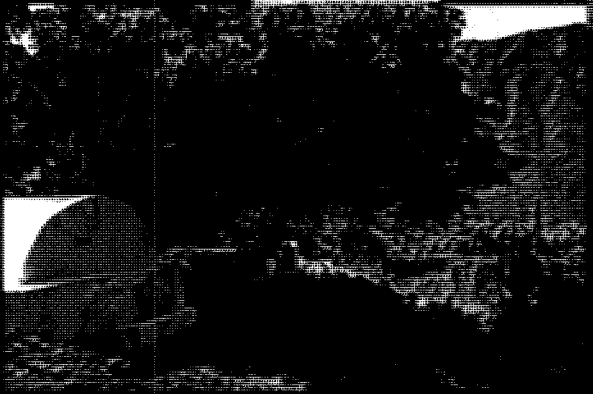
- Do I want the graveyards at Kalaupapa to be preserved for future generations – descendants and visitors alike?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on Kalaupapa's graveyards?
- Do I want the protected beaches — highly favorable to monk seals during pupping season — to be preserved for and endangered species as well as future generations?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on the pupping beaches of an endangered species?

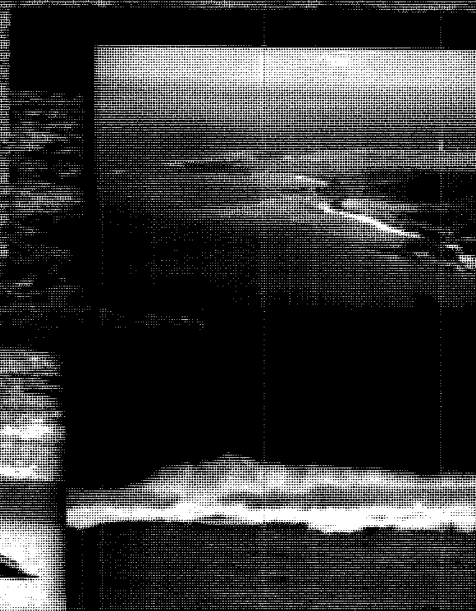
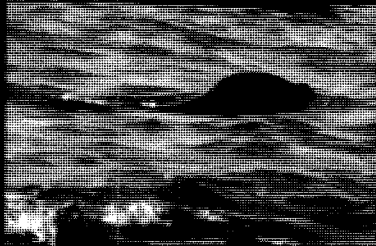
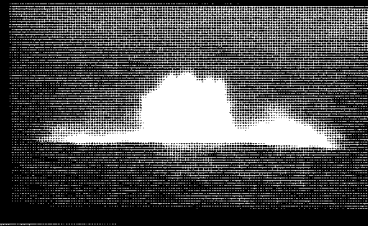
2 pages of photographs follows this page.

Comments continue after photographs.



All decision-makers should -- in silence -- walk the marked and unmarked graveyards of Kalaupapa, Kalawao, and the peninsula before making any decision.





All decision-makers should walk the protected beaches before making any consequential decisions.



Molokai Dispatch

NATIVES OF AIR AND SEA

Season's first pup

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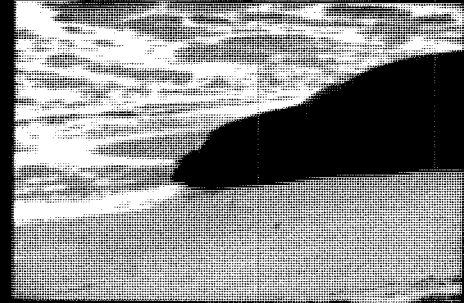
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2. Haste Lays Waste & May Stoke Unnecessary Resentment

(a) Any/all decision makers should experience the many aspects of Kalaupapa for several days and nights

(iv) *Visit the Peninsula*

Spend time out on the Kalaupapa peninsula.

Look out over the peninsula from the ridge above Kauhakō Crater. Drive to 'Ālau and Kaupikiawa and onto the lighthouse.

Appreciate the unspoiled beauty.

Notice the many signs of past settlement.

Appreciate the untold history in the rocks and in the ground.

Questions a decision maker might ask him/herself:

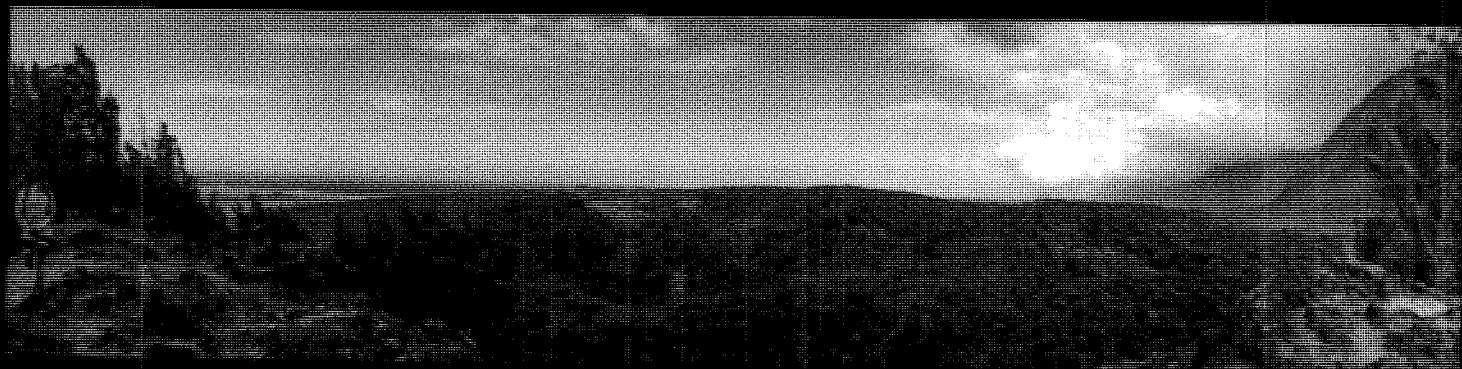
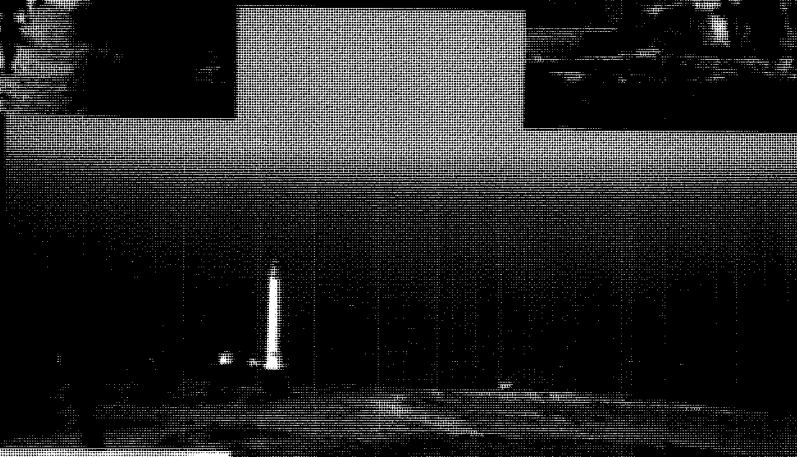
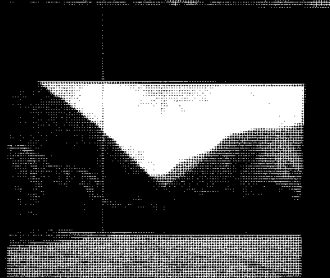
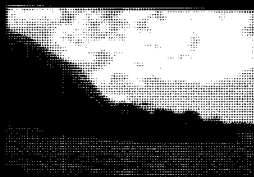
- Do I want the unspoiled nature of the Kalaupapa peninsula preserved for future generations – descendants and visitors alike?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on the Kalaupapa peninsula?
- Do I want the past and sometimes untold history of the peninsula preserved for future generations?
- If yes, what impact will Plans A, B, C, and D — or any future plan — have on preserving the history of the peninsula?

1 page of photographs follows this page.

Comments continue after photographs.



All decision-makers should visit the Kalaupapa peninsula before making any consequential decisions about the future of Kalaupapa.



3. Share your views & ideas with the class via Research Station

(a) Any/all decision makers should experience the many aspects of Kalaupapa for several days and nights

(v) Visit Kalawao Settlement

Spend some quiet time at the Kalawao lookout.

Appreciate one of the most beautiful places on Earth.

Notice the rocks where many persons with Hansen's disease came ashore, some swimming in because the boats carrying them stayed offshore due to rough water.

If at the Kalawao lookout when a tour bus arrives, notice how the experience changes.

Imagine a tenfold increase in the number of buses.

Questions a decision maker might ask him/herself:

- How do I want the Kalawao Settlement to be preserved for future generations?
- What impact will Plans A, B, C, and D — or any future plan — have on the beauty and history of the Kalawao Settlement?

Glass Shatters

Drop the finely spun glass artifact that is Kalaupapa and it will shatter. Once shattered, it cannot be returned to its original beauty.

Decision makers must know what they hold in their hands.

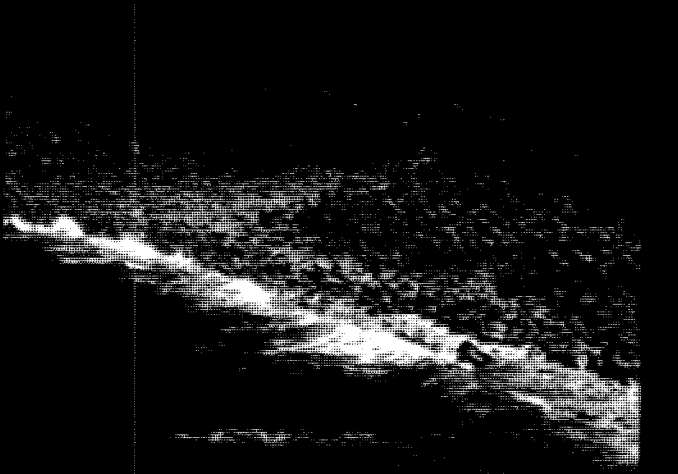
They cannot know this if they have not experienced Kalaupapa first hand.

1 page of photographs follows this page.

Comments continue after photographs.



All decision-makers should visit Kalawao settlement before making any consequential decisions about the future of Kalaupapa.



BEYOND HERE...

THERE BE MO'O

2. Haste Lays Waste & May Stoke Unnecessary Resentment

(b) Sit with and listen to all parties personally touched by the forced involuntary separation of families and isolation of individuals on the Kalaupapa peninsula

Public response to the May 7th, 2015 NPS presentation at The Bishop Museum in Honolulu made it clear that many directly-involved parties had — perhaps unintentionally — been excluded from the planning process.

Excluded parties included those with family members who had lived and died on Kalaupapa, families with marked and unmarked graves on the peninsula, native Hawaiian descendents of those dislocated by the establishment of the Hansen's disease settlement, and groups that have worked tirelessly over the years sharing the Kalaupapa story in Hawai'i and around the world.

Not surprisingly, exclusion from the planning process led to many strong and negative emotions, distrust of the planning process to date, and fears about the "rush rush" nature of having a final plan by the 100th anniversary of the NPS.

Also, those charged with developing Plans A, B, C, and D lacked the experience, ideas, and creativity of those personally touched by the Kalaupapa experience.

The most responsible and ethical step the NPS might take now is to:

- Scrap the artificial, NPS-centered final-plan completion date
- Underscore that Plans A, B, C, and D are just plans
- "Park" Plans A, B, C, and D
- Create the opportunity to create Plans E, F, G and H
- Invite all personally-affected individuals, families, and organizations to be part of developing a comprehensive plan for Kalaupapa's future
- **Actively seek out** those personally-affected individuals, families, and organizations that do not respond to an NPS invitation
- Listen
- Listen some more
- Then begin to craft plans for Kalaupapa's future, keeping personally-affected individuals, families, and organizations in the loop throughout the process

2. Haste Lays Waste & May Stoke Unnecessary Resentment

(c) Sit with and listen to descendants of native Hawaiians forced to relocate due to the establishment of the Hansen's disease settlement

The stories of the Kalaupapa community, Father Damien, and Sister Marianne are not as well known as they might be.

The stories of native Hawaiians — relocated when the settlement was established — are known even less.

In addition to the many settlement graves on the peninsula are the many graves of those who lived on the peninsula before the settlement.

It is imperative that those planning Kalaupapa's future invite and actively seek out the descendants of the native Hawaiians who lived and buried their dead on the peninsula.

If, due to part and/or federal policy, the NPS cannot "invite and actively seek out" parties:

A person or persons with the necessary sensitivities, wisdom and authority must find a way to proceed in a manner fitting to the location under consideration.

"We MUST do it the standard NPS / federal way" will not work. The glass will shatter.

Comments continue next page.

3. Who Owns What? What Might Happen After the Lease Expires?

Absent from the both the NPS documents and May 7th presentation/discussion at The Bishop Museum in Honolulu was a clear sense of:

- Who owns what on the Kalaupapa peninsula
- The various actions landowners might — independent of the NPS — take once various leases end

Without clarity about these issues, it is difficult to understand Plans A, B, C, and D, let alone make credible future plans.

NPS planners might:

- Publish maps of Kalaupapa, the peninsula, Kalawao, and adjacent areas **clearly** indicating
 - Who owns what now
 - Which areas may change ownership in the future
 - When changes in ownership may occur
 - What the NPS will oversee if future owners do not wish to participate with NPS
- Involve and/all post-lease landowners in any/all deliberations and planning about Kalaupapa's future

Comments continue next page

4. Thinking Outside the Park Box

Conflicting perspectives can often be resolved if parties to the conflict can agree on a “higher purpose.”

Perhaps, before finalizing plans for the future of Kalaupapa, the NPS might create a “higher purpose” or “vision statement” for the peninsula, one all parties — residents, relatives, descendants, native Hawaiians, endangered-species specialists, preservationists, NPS employees, visitors, volunteers, etc., etc. — might agree on.

Perhaps, too, the NPS might engage in a process designed to collect creative ideas for the future of Kalaupapa. As with finding a common vision, a period of “blue sky thinking” (every idea’s a good idea, especially if it stimulates more creative ideas) might build bridges between conflicting interests.

Creative solutions must be found to problems such as financial sustainability + protecting monk seal pupping areas, increased numbers of visitors + preservation of the isolation, spirit, and soul of Kalaupapa, etc.

Creative ideas are needed regarding how to transmit the history and meaning of Kalaupapa without diminishing or trivializing that history and meaning.

A great many people, from all walks of life and backgrounds, care deeply about Kalaupapa. It would not be difficult for the NPS to engage many of these persons in thinking outside the park box.

If “thinking outside the park box” is not part of internal and/or federal policy or practice:

A person or persons with the necessary sensitivities, wisdom and authority must find a way to proceed in a manner fitting to the location under consideration.

“We MUST do it the standard NPS / federal way” will not work. The glass will shatter.

5. Next Steps

At the May 7th, 2015 NPS-led meeting held at the Bishop Museum in Honolulu, it was evident that many interested parties had not had input into Plans A, B, C, and D — and that many parties felt deep resentment about the planning process to date.

The most important next step the NPS should take is to ***slow down*** — perhaps stop and reconsider for a time. The NPS should scrap its arbitrary, NPS-centered completion date and establish a completion date agreed to by all interested and affected parties.

Any and all NPS decision makers who have not spent time — several days and nights — in the Kalaupapa community should do so a.s.a.p.

The NPS should clearly communicate who owns what on the peninsula, and how leases and changing ownership may change the Kalaupapa future equation.

The NPS must invite and actively seek out all interested and affected parties, including current and future landowners. Everyone should have a seat at the table.

If the NPS can establish a “higher purpose” or “vision” for Kalaupapa’s future, and collect creative ideas from all interested and affected parties, an out-of-the-park-box set of ideas might guide a plan that has widespread support and stand a better chance of preserving a unique location and history.

Again — drop the finely spun glass artifact that is Kalaupapa and it will shatter. Once shattered, it cannot be returned to its original beauty.

NPS decision makers must know what they hold in their hands.

Kalaupapa is more like Auschwitz-Birkenau than Yellowstone.

To “not know” is a sin of omission.

A person or persons with the necessary sensitivities, wisdom and authority must find a way to proceed in a manner fitting to the location under consideration.

“We MUST do it the standard NPS / federal way” will not work. The glass will shatter.

Thank you for this opportunity to comment.

Comments continue next page.

With the establishment of the colony on Moloka'i, officials initiated what would prove to be the longest and deadliest instance of medical segregation in American history, and perhaps the most misguided.

The Colony: The Harrowing True Story of the Exiles of Moloka'i
— John Tayman

They paved paradise
And put up a parking lot
With a pink hotel, a boutique
And a swinging hot spot

**Don't it always seem to go
That you don't know what you've got
Till it's gone**

They paved paradise
And put up a parking lot

"Big Yellow Taxi"
Joni Mitchell

The nurse led me away. I was too scared to look anywhere but straight ahead... No one had told me anything much, lest of all the truth... All I knew for sure was that my mother was crying and that her heart was breaking.

That day was May 12, 1936. I was ten years old. From this day, I would be forever known as a "leper."

No Footprints in the Sand: A Memoir of Kalaupapa
— Henry Nalaeiua

evolving journey and hope that
there will be ways to act on
my kuleana that will be helpful
in a meaningful way... a fitting
way to honor and remember my
people and the people of
Kalaheo and Kalaupapa and
Molokai, in general.

Thank you, thank you and
please take good care,
Machalo pihia,
rosie soo

6-8-15

Altha Superintendent Espanola,

Wanted to let you know how
your willingness to ^{meaningfully} engage the
public is greatly appreciated.
I have great faith that you
will meaningfully pursue ways
to include the voice of the
people in future planning for
Kauai.

If I may ever be of service
or assistance, please do not
hesitate to contact me. I see
my kuleana as an

Rosanne K. Goo



May 21, 2015

VIA EMAIL TO

General Management Plan
Attn: Erika Stein Espaniola, Superintendent
Kalaupapa National Historical Park
P.O. Box 2222
Kalaupapa, Hawaii, 96742

National Park Service
Attn: Kalaupapa NHP GMP/EIS
909 First Avenue, Suite 500
Seattle, WA 98104

Re: Draft GMP

Dear Superintendent Espaniola:

I had intended to send this along soon after meeting you at the public meeting at Bishop Museum in May. My apologies for the delay.

I appreciate this opportunity to comment on the draft GMP for Kalaupapa National Historical Park ("KNHP").

I had the privilege of visiting Kalawao and Kalaupapa, as a Damien Tour participant with Richard Marks in my 20s and then again in my late 40s with one of Gloria Marks' tour bus drivers.

More recently I visited in the summer of 2014 after contacting Ka 'Ohana O Kalaupapa and again last month for the 'Ohana's annual meeting.

My great great grandfather, Rev. David Kaai and his wife Sarah, served the people of Kalawao and Kalaupapa and are pictured in one of the photos NPS has included in the draft GMP. My great grandmother, Ella Bridges Kaai, was sent to Kalaupapa as a young

National Park Service
May 7, 2015

girl in the late 1800s and released as a suspect as a young adult. She would have resided on the grounds of Bishop Home in a structure that is no longer present on that site.

My grandmother Lihue, Ella's daughter, was confined at Hale Mohalu as adult mother and grandmother. Ella's youngest daughter also contracted Hansen's disease as an adult.

Our family is from the east end of Molokai but my great grandmother Ella and my grandmother Lihue were awarded homesteads in Kalamaula and Hoolehua, respectively, as were other members of our family.

The land that Rev. Kaai acquired in Mana'e is still in our family and Mana'e has become my second home.

I would not have missed the opportunity to provide public comment because it is a way to acknowledge and fulfill my kuleana to myself, to my family and by extension to the community.

First, I am generally satisfied with Alternative C. However, I believe the GMP could be an even more helpful guide to NPS, if NPS would include specific reference to the need to limit visitors on a daily basis to that number that will allow NPS to manage KNHP to preserve the sacred nature of the land and memory of its people.

The inclusion of a specific number in Alternative C, will provide meaningful guidance for safeguarding the sacred and unique nature of Kalaupapa. At a minimum, I would urge NPS to include language such as "NPS acknowledges the need to limit the number of daily visitors to KNHP for the purpose of managing KNHP to preserve the sacred nature of the land and the significant historical and cultural history of the land and its people."

When more detailed planning commences in the future it will be necessary to keep in mind the impact the number of visitors will have on the sacred nature of the land and the ability to preserve the appropriate memory of its people. Accordingly, I respectfully suggest NPS continue to focus on limiting the daily visitor count as a way to maintain a proper balance between making KNHP available to the community and preserving the unique culture and history of the place and its people.

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May 7, 2015

Should NPS acquire land from Halawa to Wailau from Puu O Hoku Ranch and in Pelekunu from The Nature Conservancy, it will be necessary to invest time and effort in future detailed planning to coordinate the visitors to the reserve in such a way that KNHP is not overrun with visitors. Accordingly, a specific reference in the GMP to connecting the number of visitors coming to KNHP (in relation to the number of visitors to the reserve) to preserving the sacred nature of the land will be even more critical.

Second, I believe NPS has done an admirable job in recognizing the importance of hearing the voices of the residents, descendants and Hawaiian people, among others, in putting together the draft GMP. It is apparent from reading the draft GMP that NPS has afforded the public opportunities to comment at each step of this planning process.

I think the GMP could be even more meaningful if the written public comment received by NPS is included in the final GMP. The public comments are a part of the history of KNHP and are an important part of the record that will culminate in the final GMP. To fail to include the written comments would be akin to failing to provide the complete record. And, moreover, it would leave a gap in the historical record which serves to inform decision-making in the future and could be very critical in helping future NPS staff understand the complete history of the park for planning purposes.

Third, to maintain the integrity of the planning process for the draft GMP and for the detailed planning yet to come, it will be incumbent upon NPS to acknowledge its kuleana to regard the voice of the people going forward

To insure the GMP will be a meaningful guide for NPS in planning for the future of KNHP, it seems necessary for NPS to include additional language in the GMP to acknowledge the importance of continuing to include the voices of the kamaaina and residents and their descendants, as well as the voices of the descendants of the patients/people sent to Kalawao and Kalaupapa.

In the draft GMP, NPS explains the GMP will not include descriptions of how projects and programs will be implemented because in the future, necessary detailed planning will be conducted for the purpose of making these decisions.

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If that is the case, it is very critical to the integrity of the GMP and future planning based on it to include a description of how the voices of the kamaaina, residents, their descendants and the descendants of people sent to Kalaupapa and Kalawao will be included for purposes of future detailed planning.

It is my hope NPS will revise the GMP to include language in the nature of the following:

"NPS recognizes the importance of including the voice of the people in determining how best to manage KNHP, interpret themes, and plan for programs and activities of KNHP, including but not limited to outreach programs inside and outside of the park. Accordingly, NPS understands it is necessary to include the voice of kamaaina and residents, through their descendants and the voice of the people sent to Kalawao and Kalaupapa, through their descendants, in all planning associated with KNHP. To that end, NPS will seek to establish dialogue, have discussions with and pursue partnerships, agreements and opportunities with descendants of kamaaina, residents, and the people sent to Kalawao and Kalaupapa to insure the voice of the people is never forgotten."

Inclusion of language in the GMP to describe the need for dialogue, partnerships and agreements, etc. with descendants is critical if NPS is to use the GMP as a guide for managing KNHP and determining how best to interpret the cultural and historical significance of the land and its people. Without such a reference and the actual participation of descendants, it will not be possible for NPS to properly interpret that voice and, therefore, to properly understand what is appropriate for KNHP.

I would respectfully suggest the current residents and their wishes must be the priority.

However, if as NPS says this GMP is being put together in anticipation of the day when there are no longer residents to give voice to their wishes and DOH is no longer a co-partner in managing the land and its uses, I also respectfully suggest that without specific reference in the GMP for the need to consult the descendants of kamaaina, residents and people sent to Kalawao and Kalaupapa, the GMP will not be a proper guide for managing KNHP.

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Fourth, in addition to being able to participate in planning, I also believe it is important for descendants to care for the land to which their people were sent.

As a descendant I would like to see a formal procedure for descendants to be informed of and included in volunteer opportunities offered and sponsored by NPS. It is my belief descendants should be afforded the priority and privilege to participate in caring for the land because it is the kuleana of the descendants to do so.

Practical considerations make it impossible for descendants to not recognize and work with NPS in the framework of the existing KNHP to fulfill their kuleana. Many of us are Hawaiians with a deep desire to care for this place to which our family members were sent. As we see others participate in volunteer activities it brings to mind the need for us to step forward, accept our kuleana, and take appropriate action to fulfill that kuleana.

To that end, I would encourage NPS to revise the draft GMP to include language that recognizes the importance of establishing a procedure for informing descendants of and including them in volunteer opportunities to care for the land to which our people were sent.

Going forward, a very significant part of the story of the Kalawao and Kalaupapa Settlements will be the way in which descendants handle this kuleana to love and care for the land.

Affording descendants the means to fulfill their kuleana going forward, would be a very significant planning success for NPS and ensure a legacy for the park that is appropriate and fitting to honor the history of the Settlements and the people that were exiled there.

Lastly, it would seem prudent and practical for NPS to form an advisory group for planning purposes. That group should necessarily include representative descendants.

I would respectfully suggest that the only way to include the voices of the people would be to include representative descendants from each of the three groups of kamaaina, residents, and people sent to Kalaupapa and Kalawao on any committee, advisory group, task force or similar group formed to assist with any future planning. If no group or committee is formed then representative descendants should work together

National Park Service
May 7, 2015

directly with NPS to formulate the programs and activities that will flow from the GMP because without the voice of the people the planning for the future would be incomplete.

If an entity such as Ka 'Ohanā O Kalaupapa that has already done so much wonderful work in the community at large and for descendants, specifically, could be included by having its appointed representative participate in the discussions surrounding future detailed planning that would only enhance the planning process.

However, because the group of descendants continues to grow to include ever more people and families, it would also be practical and prudent to include other representative descendants on any future committees or advisory group formed by NPS to plan under the GMP or at the very minimum to be included in meaningful dialogue about appropriate ways to acknowledge, embrace and include the voice of the people in determining what the future will look like for KNHP.

I trust that I will have an opportunity to act upon my kuleana and have faith that the planning process, as it unfolds, will include the voice of the people because that is what is pono.

Thank you for this opportunity to have my comments made a part of the public record concerning the draft GMP. I look forward to following the process and being a part of the future of KNHP.

Mahalo piha,


Rosanne K. Goo

Rosanne K. Goo



[REDACTED]
KALA GMP, NPS <kala_gmp@nps.gov>

Kalaupapa Testimony

2 messages

Taka Harada <[REDACTED]>

Fri, Jun 5, 2015 at 5:43 PM

To: "KALAGMP@nps.gov" <KALAGMP@nps.gov>

[REDACTED]

To all,
My testimony to the NPS hearings.....

Taka Harada

Sent from my iPad



Kalaupapa Testimony.pdf
27K

[REDACTED]

Testimony for Kalaupapa National Park hearings
Takayuki Harada
6/5/15

My name is Takayuki Harada, brother of Paul Tadashi Harada, deceased, and brother-in-law of current patient, Winifred Marks Harada, now living in Kalaupapa. I have been a visitor to the settlement since 1963, visiting my brother and his wife.

My statements are a culmination of these visits and my deep concern that this part of Hawaiian history is never forgotten and what happen on the Makanalua Penisula never happen again in Hawaii or throughout the world again. I have been involved with Ka Ohana O Kalaupapa to assure this will be an integral part of the future plans of the National Park Service.

The existence of the National Park Service came about because of patients' concern that their legacy and struggles would gradually fade away in subsequent generations. Ka Ohana's goals were conceived with these very same patients' desire that their stories are remembered in perpetuity. As an advocacy patients group, working in partnership with the National Park Service, we hope this partnership would ensure their stories live on for as long as the National Park remains the steward of this amazing spiritual place.

The uniqueness of the Park is that their existence is about what has happened on this land. It is about human stories recounting their struggles, their pain, their ability to overcome untold inequities placed on some 8000 individual patients. They were the very young and very old, men and women, married and individuals, and the separation from families, friends, and communities all over the now State of Hawaii. Although the location of Makanalua Peninsula is situated along the most beautiful Seacliffs of the World, the story of Kalaupapa is more about individual human lives past and present and how they were wrongly treated by society. This story must be an important part of the Park's future existence.

I think that the Park Service may have unintentional moved from this very core belief. The Parks presence in Kalaupapa owes its existence to the patients, who worked through our Congressional legislators, moved legislation to have the Park Service oversee this very important piece of land. It is a land filled with their presence, voices, and whose spirit continues to be felt. Their collective memories shared of what it was and is to be a Hansen's disease patient continue to resonate to whomever is willing to hear their stories. These voices and stories must be archived and provided for all future visitors to the Kalaupapa National Park.

Ka Ohana is already sharing so much of this story throughout the state with the public displays of the history and stories of patients sent to Kalaupapa since January, 1866. I have personally spent time and participated during these public displays. I have seen the tremendous response from families and friends who became reconnected to Kalaupapa when they discovered family members or relatives who were sent there. They begin to understand the effects a public policy to separate people because of fear.

Ka Ohana should be acknowledged for this work they are and is continuing to share the Kalaupapa story with the wider public. We ought to be working in partnership with the Park Service in perpetuating the desires of the more than 8000 patients to tell their stories by those who were sent to Kalaupapa.

Ka Ohana have also been mandated by Congressional legislation to build a memorial on the peninsula. Thus, a working and collaborative partnership is an important relationship and must be acknowledged as we look to the future of Kalaupapa. This is in response to patients crying out to all willing to hear them that they are "never forgotten". The Ohana heard their cry and responded by seeking the help of Congressional Representatives to pass legislation to establish a monument so everyone sent to Kalaupapa since January, 1866.

As the last patient passes away, it is my hope that Kalaupapa become a very important visitors' destination where one come away educated about the destructive ways of prejudice, unfounded fear, and discriminatory reaction to a fellow human being. It's future should be to educate the public of what has happened in our own backyard. We have to make sure that we not let this opportunity to right a wrong slip away as we ponder the future of Kalaupapa.

I would like to acknowledge my personal appreciation for the presence of the Kalaupapa National Park service and their work with the State of Hawaii to care for the patients in Kalaupapa. There are many things done on behalf of the Settlement and patients until the last patient dies. I appreciate this opportunity to share my thoughts as the future of Kalaupapa is being contemplated. I hope this process will provide information for a meaningful solution on behalf of all patients sent to Kalaupapa.

Thank you,
Takayuki Harada



KALA GMP, NPS <kala_gmp@nps.gov>

Kalaupapa Management Plan

1 message

Alan Kaufman, DVM
To: KALA_GMP@nps.gov

Sun, Jun 7, 2015 at 12:18 PM

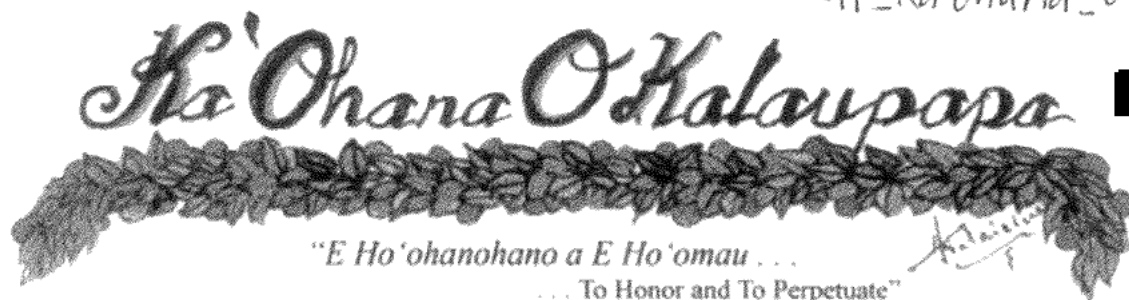
Regardless of which proposal is selected, all proposals will fall short unless:

1. Ka Ohana o Kalaupapa is given special status in the plan. The Ohana has a proven record and is the voice of the families. It already does much of what the Park Service is proposing.
2. There is a native Hawaiian community living on the Peninsula. Hawaiians lived at Kalaupapa and Kalawao for generations before being displaced by government policies during the 1800s. Without a native Hawaiian community the Peninsula would be barren and sterile. This land has seen much death and needs to return to being a place of life.
3. The families of those sent to Kalaupapa retain the right of visitation and access beyond the regulatory authority of the Park Service. The Park should not be determining when visitation takes place but respond to visitation by providing all possible logistical support.
4. The Memorial asked for by the residents move forward now.
5. The Park Service is at Kalaupapa because it was invited by the residents. Expanding the Park to include adjacent lands was not requested. Rather than including expansion within the Plan, the Park can demonstrate proven stewardship of Kalaupapa prior to expansion being a consideration.

Alan Kaufman DVM

My son is Maika'i Kapahee Kaufman.

Kapahee lived in Kalalau Valley on Kauai and in 1893 was sent to Kalaupapa. Ka Ohana O Kalaupapa was instrumental in helping my ohana reconnect with our ancestors.



**Ka 'Ohana O Kalaupapa
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Valerie Monson
Coordinator and Secretary

June 8, 2015

Erika Stein Espaniola, Superintendent
Kalaupapa National Historical Park
PO Box 2222
Kalaupapa, Hawaii 96742

Dear Erika,

The Board of Directors of Ka 'Ohana O Kalaupapa thanks the National Park Service for recognizing the importance of creating and implementing a General Management Plan for Kalaupapa National Historical Park. We trust that the Park Service will seriously consider our comments that are listed below. We believe our recommendations will make the plan stronger and more inclusive.

Ka 'Ohana O Kalaupapa is a nonprofit organization made up of Kalaupapa residents, family members and longtime friends. Since we organized in 2003, our President has always been a Kalaupapa resident – first Kuulei Bell and now Boogie Kahilihiwa. We have two other Kalaupapa kupuna on our Board as well as seven family members and two longtime friends. Eight of our 12 Directors are Native Hawaiians. Our mailing list now includes more than 1,200 individuals.

The 'Ohana continues to support the Position Paper we submitted to the Park Service in 2009 following the first round of public hearings – as well as the comment letter we submitted following the second round of hearings in 2011.

We trust that the project leaders of the GMP will reach out to Ka 'Ohana O Kalaupapa when preparing the revisions to give the 'Ohana its due recognition and include language that recognizes the 'Ohana as a long-term partner already in charge of certain programs related to Kalaupapa.

The 'Ohana is also concerned about how the final plan will be determined – what is the decision-making process of the NPS? As you have heard, members of the public have expressed frustrations that they have been involved in the GMP process since 2009 or after and yet they feel their voices have not been heard. What weight do public comments carry as opposed to the opinions of the NPS administration, most of whom are located outside of Hawai'i?

These are our comments about the proposed General Management Draft issued in April, 2015:

There is little mention of Ka 'Ohana O Kalaupapa. It is quite disappointing that there is barely any mention of Ka 'Ohana O Kalaupapa in the GMP considering all that the 'Ohana has done in the past 12 years in advocating for the Kalaupapa community, assisting family members in learning about their ancestors, developing educational programs and public presentations that have been traveling around the islands for the past few years and working for preservation of

this important history. The 'Ohana also has been assigned a house at Kalaupapa by the Department of Health for use as a headquarters and future museum to honor the wishes of Bernard Punikai`a. The 'Ohana should be included as a long-term partner in the GMP and be given credit for the many improvements and programs we have made possible. It's also disappointing that the Position Paper we submitted in 2009 to NPS is not even included among the several plans and documents used to prepare the GMP – it is simply referenced. Our Position Paper was written with the input of the Kalaupapa community and endorsed by the Board of Trustees of the Office of Hawaiian Affairs and now-Senator Mazie Hirono among others.

The plan fails to recognize the programs developed by the 'Ohana while proposing that the NPS duplicate them using taxpayer money. NPS is now proposing to develop programs to reach out to the families of Kalaupapa and schools, conduct public presentations and create exhibits – projects already created, funded and made highly successful by Ka 'Ohana O Kalaupapa. Several years ago, the 'Ohana saw the need for this outreach and we have since reached thousands of students, family members and other members of the public across Hawai'i. Our "Restoration of Family Ties" program has helped more than 500 families reconnect with their ancestors – we have information on more than 7,200 people sent to Kalaupapa in our digital library from our research of public archives. Three of our programs have been presented with Preservation Awards by the Historic Hawai'i Foundation.

Since 2011, we have visited almost every island at least once a year – except Ni'ihau -- and most of those islands we have visited more than once a year in our efforts to seek out more families and provide the public with an opportunity to hear about our work. Our schools outreach program has grown to the point where we now have a team of Hawaii educators beginning to work on curriculum on how to include the history of Kalaupapa in classrooms. Our traveling exhibits have appeared at UH-Manoa, six community colleges, museums, public places and we are now going into the high schools. The 'Ohana hopes that the NPS would support these programs already developed and being conducted by the 'Ohana and not use taxpayer money for duplicate purposes.

The Kalaupapa Memorial is barely mentioned in the 325-page plan. The Kalaupapa Memorial is barely mentioned in the GMP and we believe it will be the most significant addition to Kalaupapa over the next several years. The Memorial should be included as a project common to all alternatives.

In addition there are two serious mistakes about the Memorial that need to be corrected in the final GMP. On Page 37, it states that the Memorial will be located "near" the former Baldwin Home for Boys. This is not correct – it will be located within the rock walls of the former Baldwin Home which is now open space. This has been the preferred location of Kalaupapa residents for many years. The second error is on page 226 where it states the legislation passed by Congress and signed into law by President Obama authorizes the 'Ohana to "install" the Memorial. Again, this is not correct. The law authorizes the 'Ohana to "establish" the Memorial which we are doing – we will build the Memorial and lead the operations and maintenance. These corrections need to be made to the final GMP.

We do not support the proposed boundary amendments where NPS would acquire lands within Pelekunu and Halawa valleys. When Kalaupapa National Historical Park was established in 1980, it was at the invitation of the people of Kalaupapa to preserve their lifestyle and the important history at Kalaupapa. It appears these new lands could

be the start of the North Shore National Park where recreation could be emphasized rather than the human history of Kalaupapa. The draft GMP states that the current NPS staff at Kalaupapa would be responsible for managing this additional 12,000 acres. Considering that the NPS had to furlough staff in the summer of 2014 because of economic cutbacks, we believe that the programs at Kalaupapa could suffer if staff is also responsible for these additional lands.

We also believe that the proposal for the NPS to take over these lands has a direct impact on all the people of Molokai. It is disappointing that it appears that the NPS has already been involved in serious discussions with the landowners about obtaining these lands, but without public input until now. The comments of residents of Kalaupapa and upper Molokai need to be carry additional weight in the final decision to acquire these lands.

More serious discussion need to take place with the beneficiaries about homesteading in the future at Kalaupapa. There still seems to have been little discussion about homesteading at Kalaupapa other than meetings with officials (we are aware of the meeting held last month with beneficiaries on upper Molokai). The NPS currently has a lease for approximately 1,300 acres of Hawaiian Homelands that make up the ahupua`a of Kalaupapa – this lease expires in 2041. For the past 11 years, the 'Ohana has been encouraging NPS and DHHL to have discussions about the future not only with DHHL officials in Kapolei, but with the beneficiaries, those who have lots and those on the wait list. These discussions – not lip service -- simply must happen or people will feel left out when a decision is made. One meeting every few years is not sufficient.

If homesteading is allowed, can preference for homesteads be given to descendants of those sent to Kalaupapa because of government policies regarding leprosy and/or the kama`aina who were there when the settlement was started? These individuals would carry on the legacies of their ancestors in the very place where they lived.

In addition, the 'Ohana continues to support our 2009 Position Paper where we stated that we oppose any land exchange between the Department of Hawaiian Homelands and the NPS or any other federal agency for the land at Kalaupapa.

A cap for visitors must be set. There is no set number for visitors allowed at Kalaupapa per day in Alternatives C and D – although during public hearings held in May, 2015, NPS officials stated that there was a “facility capacity” of about 300 persons per day at Kalaupapa. This is a dangerously high number that could destroy any preservation efforts at Kalaupapa.

As we all know, there is currently a limit of 100 visitors a day – this number was determined by the Kalaupapa community. In the future, there must be a set number of visitors. The visitor cap should be reviewed annually. Too many visitors at Kalaupapa will quickly ruin the special feeling one gets of being on sacred ground. In the Position Paper submitted in 2009, Ka 'Ohana O Kalaupapa recommended that when there are no longer individuals who were once isolated under the old laws living at Kalaupapa, there should be a limit of 150 day-only visitors with a limit of 25 overnight visitors. These numbers should also be reviewed annually – and lowered, if necessary, to protect the resources. The 'Ohana also recommended that family members be given preference for visitation.

There still seems to be an emphasis on visitors, but little mention of family members or Native Hawaiians. As we started in our 2011 comment letter, family members should

not be considered visitors in the land of their ancestors and Native Hawaiians should not be considered visitors in their own land. Preference to visit Kalaupapa should always be given to family members and Native Hawaiians.

As we stated in our 2011 comment letter, Native Hawaiian access rites must be recognized. We do not see this addressed in any of the alternatives – Native Hawaiian access rites should be common to all alternatives. Some Hawaiians have expressed interest in growing kalo in Waikolu Valley or having access to other parts of the Makanalua peninsula for agricultural purposes, gathering rites and spiritual practices. These proposals have merit and should be pursued with ongoing discussions on how to allow this access without destroying the resources or sacred feeling of Kalaupapa.

Kalaupapa will always be a place – not a park. It is troubling that the NPS continually references Kalaupapa as “the park.” To many of us who have been connected to Kalaupapa for many years, Kalaupapa is a community and the home or final resting place of ancestors and loved ones. Kalaupapa National Historical Park has certainly become an important part of Kalaupapa, but Kalaupapa is not -- and will never be -- “a park.”

Members of Ka 'Ohana O Kalaupapa – and others from the public -- should be allowed to fill vacant seats on the Kalaupapa National Historical Park Advisory Commission. The application process to the KNHP Advisory Commission should be posted on the KHNP website so more individuals are aware of any vacancies – and how they can apply. If Kalaupapa kupuna are no longer able to serve on the Commission or if there are other openings, family members and Native Hawaiians should be given first preference to fill any vacancy.

A Kalaupapa Task Force of interested parties should be created. This idea was suggested by Native Hawaiians on upper Molokai who have an interest in the future of Kalaupapa. There are many organizations involved at Kalaupapa in addition to the descendants of the kama`aina and those sent to Kalaupapa along with the Native Hawaiians on upper Molokai. A Task Force with representatives of all of these voices should be established so plans can be discussed with public input.

Ka 'Ohana O Kalaupapa should be consulted on decisions that will be made when there is no longer a living community of those who were sent there under the isolation laws – this is the land many of us or our ancestors called home. The 'Ohana should be an acknowledged voice in decision-making, especially on such key issues as those listed above.

While this GMP was 325 pages long with many more pages attached, none of the written public comments received since 2009 were attached. All written comments, including the Position Paper of Ka 'Ohana O Kalaupapa, should be part of the final GMP in both electronic and print form. These comments will be an important part of the record for future reference.

We appreciate the opportunity to offer our concerns and recommendations. If you have any questions or would like to review any revisions, please contact our Coordinator, Valerie Monson, at vmonson@kalaupapaohana.org or 808-573-2746.

Ka 'Ohana O Kalaupapa hopes that our comments are helpful and we hope the National Park Service will accept additional comments that might arise at a later date and continue these discussions. We look forward to working with the Kalaupapa

community, the National Park Service and other interested parties in the future to preserve this important place and present the history of the people of Kalaupapa in the way they want to be remembered.

Mahalo nui loa,

A handwritten signature in black ink, appearing to read "Clarence Kahilihiwa". The signature is fluid and cursive, with the first name "Clarence" being more legible than the last name "Kahilihiwa".

Clarence "Boogie" Kahilihiwa
President



KALA GMP, NPS <kala_gmp@nps.gov>

Kalaupapa GMP/EIS, National Park Service

2 messages

Marci Lyons <[REDACTED]>

Sun, Jun 7, 2015 at 6:21 PM

To: KALA_GMP@nps.gov

Aloha and thank you for the opportunity to comment.

I am a supporter of Ka 'Ohana O Kalaupapa and am so grateful for the work they do which has been a blessing to my family. I urge the NPS to recognize the accomplishments of the 'Ohana as being in alignment with what the NPS proposes in the GMP and to support and include the 'Ohana in the GMP rather than duplicate what they have already successfully created. Of critical importance at this time is the memorial. Please be sure the 'Ohana and the memorial are included in the final draft of the GMP.

I had the privilege of attending Ka 'Ohana O Kalaupapa's annual meeting in Kalaupapa in April of this year. The testimony given by current residents of Kalaupapa in support of the memorial that is currently a priority for the 'Ohana impacted me deeply. The emotions and the urgency they felt and expressed about the memorial and their need to see that it is done strengthened my commitment to do what I can to support their wishes and this project. We cannot ignore the people who are the legacy of the place when they speak for themselves, as well as for their friends and loved ones who have gone before them, and say they 'want to be remembered and not forgotten' with the memorial.

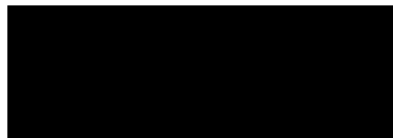
My father, Edward Weight, was born in Kalaupapa, taken from his parents and lived his childhood in an orphanage and foster homes. He never met his parents. They and two of their sons are buried in Kalaupapa. With the help of the 'Ohana I found several more family members there. When I have the opportunity to hear the few remaining residents share their stories, feelings, and thoughts on what would give them peace of mind I feel that they speak for my family and all of those who lived and died in Kalaupapa since 1866.

Having several family members in Kalaupapa I feel a strong emotional tie to the place and in many ways the entire peninsula is a memorial to me. Thanks to the wonderful work of Ka 'Ohana O Kalaupapa and Valerie Monson my father received his first photo of his mother in 2011. He was 80 years old. He then became a supporter of the 'Ohana and was able to meet other families with Kalaupapa connections. With these people he shared a part of himself that was locked away. With these people he realized he was not alone in the experiences of his youth. I witnessed a sense of peace and a shift in his sense of self that I attribute to his ability to connect himself to his mother as well as other people who shared stories that resonated with his own. I saw my father come to a new understanding of who he was and a sense of belonging to a place and with a group of people.

Please, please support and include Ka 'Ohana O Kalaupapa and the memorial in writing in the final draft of the GMP.

In gratitude and with aloha,

Marcia Weight Lyons



KALA GMP, NPS <kala_gmp@nps.gov>

Mon, Jun 15, 2015 at 10:31 AM

To: Marci Lyons <[REDACTED]>

Dear Marci,

Thank you for your comments and your interest in the draft general management plan for Kalaupapa NHP. We have added your comments to the record for analysis and look forward to keeping you updated about the planning process.

With best wishes,

Anna

[Quoted text hidden]