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Correspondence: 12

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Topic Question 2:

Preference for Plan D, because more visitor access and transportation, in favor of unpaved pathways, and an opened trail to the Waialeia waterfall.

Comments:

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Kalaupapa National Historical Park

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



Comment Form

JUN 17 2015

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.

My heartfelt description of Kalaupapa can be summed up in one word. "Humbling"

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: Patricia N. Morimoto

E-mail (required for e-mail list only):

Address:

City, State

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.

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

Please attach any additional pages, fold here, tape (DO NOT STAPLE), and place in the mail.

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She recently learned that our
great grandfather John Taylor Llew
was a prominent resident of Kelowna.
My sister and I decided to have
had the opportunity to visit and spend
several days in the settlement.

We had the privilege to interact
with residents like a husband, wife
Bongie and Ethel. Our entire visit
was heartwarming and emotional. Feeling
we never imagined because we as
we walked through the settlement
and gave sides searching for our
share.

The residents related their sentiment
of having the settlement remain under
the "protection" of the National Mills
system. I strongly believe that the
will of these residents should be
seriously considered. The experience
the daily going on of life there
and need to retain the sanctity of
the existence of the settlement.

Respecting the will of the residents
should be considered just and
premier, I believe. Not the
will of politics and politicians!

"They change something if it
not works!"

John Taylor
National Mills

P.S.
I visited: Sept. 2014

[REDACTED]

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Topic Question 1:

I do not agree with NPS Alternative C. It goes too far with commercialization of this sacred area. I am originally from the mainland. I have been coming to Hawaii for more than 20 years and permanent resident of Hawaii, Hawaii for two years.

As an observer and now a resident I have seen the Department move too fast for tourism and damage or destroy the most sacred spiritually and environmentally areas. Hawaii is all sacred but there has to be a special protection for this place.

On my first visit to Molokai I was invited to help prepare keiki for hula, making leis, musical instruments and practice. Interested in the history of Father Damian I visited one of his churches and homes on the island. As I walked the grounds a wind overtook me and I dropped to my knees where I was overcome with emotions of deep sadness, grief, acceptance, joy, love, deep connection. This was a spiritual place of great proportion based on the experiences and lives of all who had lived and died in that place. I was blessed to have been allowed to have that connection to that place.

This must be preserved. Opening it up to regular tourism will minimize and disrupt the spirituality of the place. Option C goes too far with the availability aspect. Not all places need to be shared with everyone. Some places need to be a journey and thought out planned trip, not just a place I guess we have time so lets go.

Topic Question 2:

Option B starts out properly but then expands long term into Option C. It is deceptive with its intent. I think that Option A should be the starting place and then move to Option B with some of the long term accessibility removed OR discussed after a period of time of seeing how Option A works.

The most important thing is protecting the aina and protecting the history.

Topic Question 3:

There must be the right advisors on the Board to make these determinations. Individuals with an understanding of the significance of this area. Education is key to preservation. Understanding this land is key to knowing what direction to go. Taking the time to listen to the land and it will tell you what direction to go.

I am an attorney practicing on the Island of Hawaii. The experience that I encountered on Molokai is not because I am not "mainstream" The experience was profound and not something I look for or expect. I am a serious grounded individual who was fortunate enough to have been chosen to experience that place.

Comments:

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Topic Question 3:
My great great grandfather was exiled there as a postman and continued serving the mail for the remaining 50 years of his life.
It should not be for tourist, not even for visitors, but for people who want to make pilgrimages, in memory of humanities prejudices against the sick, the abandoned, and neglected members of our society.
Build a mandatory education hale to orient visitors upon entry. Objectives: preponderance of acceptance; of a host culture, a nation stolen, families separated, causes abandoned. Hence the cliffs, shear drop off, vertical demeanor, dropped into a pit of suffrage!

Comments: My great great grandfather was exiled there as a postman and continued serving the mail for the remaining 50 years of his life.
It should not be for tourist, not even for visitors, but for people who want to make pilgrimages, in memory of humanities prejudices against the sick, the abandoned, and neglected members of our society.
Build a mandatory education hale to orient visitors upon entry. Objectives: preponderance of acceptance; of a host culture, a nation stolen, families separated, causes abandoned. Hence the cliffs, shear drop off, vertical demeanor, dropped into a pit of suffrage!
Resolute to protecting that which needs protecting; the renewability of our natural resources, our remaining natives plants and their medicinal values, healthy foods and the micro dynamics of co- habitation, for health and wellbeing.
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Topic Question 1:

NO! I DO NOT SUPPORT OR AGREE WITH THE NPS PREFERRED ALTERNATIVE!

Topic Question 2:

I am in agreement with Alternative B but with some amendments. I do not feel the Visitor Cap or Child Age Restriction should be lifted. Respect and Honor to the 8000 patients and kokua would not happen if the Settlement was treated like any other National Park. In my opinion, allowing anyone to visit for the sake of visiting even with any amount of Orientation does not guarantee Rules and Regulations would be adhered to. Requiring a child to be with a supervised adult at all times does not mean the adult themselves are responsible enough or adult enough to supervise a child. I have seen many adults with children in which the children rule the adults. This generation of children have no sense of respect or longevity which warrants them to be considered adults regardless of their age.

I feel Ka 'Ohana o Kalaupapa has been doing an excellent job in their outreach education and public awareness/engagement. Their traveling exhibit is a prime example of how an outreach program can be conducted. As lineal descendants are taking more of an active role in learning about their kupuna and the life of exile they lived and experienced, I would consider them to be more passionate docents that could be used in outreach programs.

I also do not think unescorted access should be allowed within the Settlement for Visitors. Defining Visitors as anyone who: has no lineal tie to the residents/patients exiled to the Settlement between 1866-1969, no Hawaiian blood or not affiliated with any pre-existing associations. Rules are meant to be broken. There are some who feel if no one is watching them, then they will push the limits regardless of any signage disallowing further access. NO overnight camping should be allowed for any reason.

Comments: 1. Once DOH departs, any and all activities monitored/administered/overseen or anyway engaged in by patients should be provided first right of refusal to lineal descendants, Native Hawaiian Owned Organizations, Native Hawaiian Non-Profits and Native Hawaiians in that order.

2. No other entities should be allowed to own, lease or rent any vendor services on Hawaiian Homelands without BENEFICIARY (as it pertains to the Hawaiian Homestead Act) INPUT.

3. NO services/facilities (except current restroom and picnic areas) should be allowed in Kalawao. Inclusive of when the Monument is built to honor the 8000 patients. All vending (food, gas, entertainment, merchandise sales and the like) is to be done at Kalaupapa or the Airport only.

4. A Native Hawaiian entity should be in charge of the scheduling of tours, pilgrimages, outreach/school field trips to the Monument. As well as any maintenance/repair/restoration issues. Funding should come from the Federal Government via the Department of the Interior/National Park Service for any maintenance/repair/restoration issues.

5. Any Non-Governmental Job within the confines of the National Historic Park should be provided first right of refusal to lineal descendants and Native Hawaiians.

6. Any maintenance/remodeling/renovation/repair or the like of a major construction project should be afforded to Native Hawaiians first through a bid process.

7. Kalaupapa should NEVER BE SOLD! as in the example of Lana'i for whatever purpose, NOR SHOULD IT EVER BE CONSIDERED IN ANY LAND EXCHANGE POLICY WITH ANY ENTITY!

8. Alternative means for transporting goods/supplies could possibly be done more than once a year via the means of Maui's Voyaging Canoe "Mo'okiha".

9. A secured entry/access means at the base of the Pali Trail into the Settlement should be installed to avoid unwanted/unescorted visitors or a 24 hour means of securing access from Topside Molokai. This in no way is to disallow the entry of Native Hawaiians but to ensure visitors to Pala'au State Park on Topside Molokai the ability to hike down the trail and enter the Settlement without any supervision.

10. Once this round of comments have been read and incorporated into the GMP, there should be another round of community meetings to be held on ALL ISLANDS. This would be a means to allow all concerned another opportunity to provide input/comments before the GMP goes to Final Draft.

11. Kalaupapa should not be viewed or used as a REVENUE GENERATING project! It would be disrespectful to our Kupuna!

Thank you for allowing me the opportunity to provide my thoughts/comments on such an important issue facing the future of our Native Hawaiian people with regard to its history.

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Topic Question 1:

I would agree that people should be encouraged to work and learn in the peninsula. However, as written, option C gives too much authority to NPS without due diligence to the sacredness of the land, nor does it empower those who have worked many years there (paid or voluntary, permanent or temporary, regular or intermittent, full time or part time). therefore as written I would vote NO.

Topic Question 2:

I would like to see option C revised, include more Hawaiian perspectives and values. Define the visitor limits clearly. Keep children out of the park unless guided in an. educational program. The place offers great opportunity to learn and work. People will pay to work there! Give free access to relatives. Restrict people from going INTO the marked cemeteries unless that is their family's plot. People would severely lack the great gift of interpretation and stories if given the opportunity to explore without guides.

Topic Question 3:

Everyone in the planning process should go to Kalaupapa for a week and WORK and learn from the place before deciding. Give others more of a voice in the process. Go slow. And if you don't have the time to go slow, then don't change anything... that would be owed only to lack of foresight to do this process earlier.

Comments: Mikiala Pescaia and the other park workers (her husband, The Espaniolas, etc) have done a terrific job of sharing the stories from that place and of Hawaiian culture. Do not let those voices go silent!!! encourage those stories to be told again and again to everyone who comes to the park, and expect those who come to give back for all the great gifts they will inevitably gain while there. Thank you! I'm eternally grateful to the VIP volunteer program for service-learning. Amazing experience for every one of us who have participated. "life

changing" has been said to me many times from those I volunteered with.
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Topic Question 1:
 no

Topic Question 2:
 I like B Plan because as stated by NPS Plan B would provide future guidance for managing Kalaupapa once the DOH leaves. Rules and Regs used today (especially limiting visitation to 100 people per day with current age restrictions.

ONE CRITICAL POINT I LIKE OF B IS: VISITOR USE AT KALAUPAPA WOULD BE HIGHLY STRUCTURED, THOUGH LIMITED OPPORTUNITIES WOULD EXIST FOR PUBLIC VISION. THIS LIMITED PUBLIC ACCESS PROBABLY WILL NOT SIT WELL WITH THE NPS ON THE MAINLAND HOWEVER, DUE TO THE ENTIRE AREA OF KALAUPAPA WAIKOLU SACRED BURIALS, PERHAPS NPS SHOULD UNDERSTAND THE SENSITIVITY OF A FREE RANGE OF THE PUBLIC ENTERING AND EXITING THIS AREA. I LIKE KEEPING THE AGE OF CHILDREN VISITORS TO 16 AND OLDER. AGAIN SENSITIVITY TO THE AREA REQUIRES OLDER CHILDREN.

Topic Question 3:
 HERE ARE MY RECOMMENDATIONS AS A LINEAL DESCENDANT:

LINEAL DESCENDANTS ARE INCLUDED AT THE TABLE WITH NPS AND ANY OTHER ENTITY WHEN

Correspondences - Kalaupapa NHP General Management Plan and EIS - PEPC ID: 24883

INPUT REGARDING ALL ASPECTS OF THE PLAN B.

LINEAL DESCENDANTS/NATIVE HAWAIIANS BE UTILIZED FOR PAID/WITH SOME VOLUNTEER POSITIONS. FOR INSTANCE HAVE VOLUNTEERS BRIEF VISITING GROUPS OR INDIVIDUALS WITH KEY GROUP LEADERS SIGN PAPERS ETC. AND STAY WITH THE GROUP TILL EXIT TIME. THIS PERSON WOULD BE RESPONSIBLE FOR THEIR ENTIRE STAY.

POST SOMEONE WHEN GROUPS ARRIVE FROM TRAIL TO GREET, BRIEF RULES AND REGS OF AREA. HAVE A TIGHTER CONTROL OF TRAIL ACCESS.

UNDER STAFFING/OPERATIONS; LISTED IS ADDING 14 STAFF. LINEAL DESCENDANTS SHOULD BE FIRST CONSIDERED.

AS STATED UNDER B FOR CULTURAL RESOURCES; LIKE PLAN C. THIS AREA NPS IS ALL READY IMPLEMENTING, THEREFOR, CONTINUE ACTIVITIES WITH AGAIN THE LINEAL DESCENDANTS INPUT. VERY IMPORTANT TO MAINTAIN OUR CULTURAL EDUCATION THROUGH KAPU ALOHA OR ALOHA AINA.

RECOMMEND NPS CEASE THE PLAN OR PROGRAM TO ACQUIRE PELEKUNU/PUU O HOKU AINA TO MANAGE. THAT NEEDS TO BE LEFT ALONE. NPS NEEDS TO PAY ATTENTION TO THEIR COMMITMENT AT KALAUPAPA.

COMMERICALISM AND CONCESSIONS AGAIN SHOULD BE LOCATED AT THE COMMON AREAS OF VISITORS IE., VISITOR'S QUARTERS, PASCHOAL HALL MCVEIGH HALL. WHAT TYPE OF VENDORS WHAT IS SOLD SHOULD AGAIN LOOK TO THE LINEAL DESCENDANTS.

REGARDING ANOTHER MODE OF TRANSPORTATION INTO KALAUPAPA. I HAVE CONTACTED HUI O WA'A KAULUA KAPENA TIMMY GILLIUM REGARDING FUTURE SAILS BY MAUI'S WA'A MO'OKIHA O PIILANI TO KALAUPAPA. THE IDEA WAS WELL RECEIVED. IN FACT I AM COORDINATING HER FIRST VISIT TO KALAUPAPA SOMETIME IN THIS MONTH (JUNE). THE RECOMMENDATION IS MADE TO NPS; WORK WITH MY SELF AS CONTACT AND WORK WITH MIKIALA PESCAIA, NPS KALAUPAPA. THE PLAN IS TO UTILIZE ALL OF HAWAII CANOE'S TO ACCESS KALAUPAPA. LOGISTICALLY THE LONG VOYAGING CANOES COULD CARRY MATERIALS, PERSONNEL, IN AND OUT OF KALAUPAPA. EACH CANOE THROUGHOUT THE STATE OF HAWAII TRAIN THEIR CREW MEMBERS REGULARLY ASPART OF THEIR PROGRAMS. WHAT A NATURAL AREA FOR OUR FUTURE CREW MEMBERS TO EXPERIENCE. EDUCATIONAL PRORAMS COULD BE OFFERED TO VISITORS AT KALAUPAPA WHEN THE CANOES ARE DOCKED OUTSIDE. DETAILS CAN BE WORKED OUT BY YOUR MIKIALA, OF NPS, EACH OF THE SIX CANOES CAPTAINS AND THEIR ORGANIZATIONS, AND LINEAL DESCENDANTS. IN ENTERING AN AGRRANGEMENT TO UTILIZE THESE LONG VOYAGING CANOES IS A WIN WIN FOR NPS AND ALL OF KALAUPAPA ESPECIALLY FOR FUTURE GENERATIONS OF VOYAGERS/WAYFINDERS/CREW MEMBERS. SAVE MONEY USING THIS MODE OF TRANSPORTATION; NO FOSSIL FUEL IS USED WHEN SAILING BY WIND,,BY HAULING MATERIALS FOR KALAUPAPA; WOULD CREATE CHALLENGES TO THE CREW, ALSO, PEOPLE ON BOARD THE CANOES WOULD NOT BE PAYING ASTRONOMICAL PRICES AS THEY ARE NOW 2015. DEPENDING ON AN EMERGENCY RESPONSE CANOES COULD BE USED TO RESPOND TO SITUATIONS AT KALAUPAPA.

UNESCORTED VISITORS IS WORRISOME ESPECIALLY WITH VISITORS WONDERING IN AREAS OF HUNTING. AN ESCORT NEEDS TO BE WITH VISITORS AT ALL TIMES EXCEPT MEAL TIME OR AT THEIR SLEEPING QUARTERS.

FINALLY, OFFER HANDS ON PLANTING OF NATIVE PLANTS BY VISITORS. BRING BACK THE HAND MADE CRAFTS OF HAWAII LIKE WEAVING HALA MATS, HATS, COCONUT WEAVING, FOR THE PEOPLE TO TAKE HOME WITH DONATIONS. HAWAIIAN CULTURAL PRACTITIONERS ARE READILY AVAILABLE IF APPROACHED.

Comments: AS THE HOMES IN THE SETTLEMENT ARE REPAIRED AND MAINTAINED. WHO SHOULD STAY IN THE HOMES SHOULD BE LINEAL DESCENDANTS WITH STRICT CODE OF CONDUCTS DEVELOPED AND ENFORCEMENT BY KUPUNA OF THE LINEAL DESCENDANT GROUP.

AS THESE COMMENTS ARE RECEIVED BY THE NPS ON THE MAINLAND, PLEASE STEP BACK FROM THE NORM OF YOUR TYPICAL NATIONAL PARK AND LIFT KALAUPAPA AS A ONE OF A KIND AND NEEDS TO BE TREATED WITH EXCEPTIONS TO THE TYPICAL NATIONAL PARKS.

MAHALO

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PEPC Project ID: 24883, DocumentID: 65195
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Topic Question 1:

I do not agree with the NPS preferred alternative, alternative C. Please see my comments for elaboration.

Topic Question 2:

I do not have a preference for any of the other, existing alternatives. For reasons explained further in my comments, these alternatives are lacking in the measurements of impact and planning for historical trauma, park designation, Hawaiian self-determination and food security.

Topic Question 3:

Please perform another DGMP and EIS to include the issues mentioned in my attached comments. Thank you for your work and dedication to doing what is pono for Kalaupapa and Kā naka Maoli.

Comments: Aloha k kou,

Thank you for the opportunity to comment on the current Kalaupapa National Historic Park Draft General Management Plan and Environmental Impact Statement.

The major shortcomings Id like to discuss for future inclusion in a revised Draft GMP and EIS are:

1. Historical Trauma & Healing: a history of leprosy and the 1865 law, An Act to Prevent the Spread of Leprosy, and its enforcement, have had historically traumatic and adverse impacts on K naka Maoli (native Hawaiians, Hawaiians) as a people, inclusive of individual, familial and ina-based relationships, and in addition to those of the patients.

2. Park: Kalaupapas park designation offers protection and safety for only some aspects of this place, those affected and their stories.

3. Hawaiian Self-Determination: K naka Maoli have the right to self-determine this story from varying perspectives, on our own terms, in our own time and for what audience we deem appropriate.

4. Food Security & Aloha ina Survival: K naka Maoli have the right to a food secure future, and recommendations against homesteading to subsist off of our own homelands occupied by the National Park Service (currently 8,725 acres of land and 2,000 acres of water) and by attempting to take hold of an additional vast amount of fertile land (5,259 acres from Pelekunu Preserve and 7,341 acres from Pu u O Hoku Ranch) harm this right, our survival and the survival of all people in Hawai i.

Throughout the document, there are small instances where a sentence or two make mention of these topics, but their lack of detail subsequently ignore K naka Maoli rights to health. And although my concerns are more inline with the comments mentioned by various groups in the public scoping, preliminary alternative public review and agency consultation and coordination sections at the end of the documents, the DGMP and EIS fail to address them properly and in detail.

Also, an identifiable root from which the above four issues stem is the lack of necessary presentation from perspectives in the current process, including but not limited to perspectives of communities involved with Molokai subsistence, Indigenous and Native Hawaiian public health, Hawaiian Studies and Hawaiian Language. The Office of Hawaiians Affairs and the Department of Hawaiian Home Lands were agencies consulted in this process, however, both groups have proved ineffective in their abilities to be the true voice and caretaker of the Hawaiian people and to provide locations for Hawaiians homes in an efficient and time sensitive manner. They do not represent true consultation with K naka Maoli communities, and their involvement, especially in State run happenings, creates unease and disease for many Hawaiians moving on a path toward reinstating a sovereign nation and rights for K naka Maoli.

Elaboration on the FOUR aforementioned shortcomings can be found below:

1. Historical Trauma and Healing

" The current EIS for Kalaupapa lacks impact measures for how the stories of Kalaupapa continue to impact the Hawaiian people, who were by a 90% mjority, the population most adversely impacted by leprosy and the law that separated our people from their families and homes.

" Current research has documented the historical trauma caused by this treatment, showing that it also extends and impacts beyond a living population of patients.

" This research needs to be analyzed and shared within our communities and taken into the larger context of story-ing that occurs for Kalaupapa.

" The current DGMP lacks planning for how to address the historical trauma and dignity of K naka Maoli as a whole community and people beyond the patients alone, how to provide methods, services, locations and tools for healing stigma, land separation, loss of connection to family members once taken from Kalaupapa and relocated to other islands, and more.

2. Park:

" Currently in Kalaupapa, the only health-related entity is the Department of Health. The planned removal of DOH (after the patients have gone) and transition strictly to management by National Park Services is too fast of a jump from a mode of Health to a Park mode focused on visitor experiences.

" The 1980 designation of Kalaupapa National Historic Park may have aided in the protection and safety of living patients. Thirty-five years later, and as discussion rises regarding the passing of patients and the departure of the DOH, a next phase of protection, safety and healing is necessary.

" The current DGMP and EIS ignore the healing needed in this transition, making Kalaupapas designation as a

Correspondences - Kalaupapa NHP General Management Plan and EIS - PEPC ID: 24883

National Historic Park the prime reason for the dangerous misinterpretations of Kalaupapas appropriate use.

" Because of this narrow lens based on the parks limitations, the current DGMP and EIS talk mainly about only certain types of resources and planning. The focus of preferred Alternative C is geared towards high-quality visitor experiences. This is extremely inappropriate and the concerns voiced by the communities in Chapter 6 of the DGMP and EIS need to be emphasized and supported to limit, disallow and avoid TOURISM in Kalaupapa.

" Visitors and their welfare are a small concern when talking about the health of a place and a people. However, with annual operating costs, ranging from an estimated \$4,230,000 to \$6,445,000 depending on the Alternative, it is questionable if either health or financial stability is taking precedence when concession stands, mule corals, picnics, visitor facilities, hands-on steward activities and meaningful learning experiences take up majority of the planning and measuring of impact.

3. Hawaiian Self-Determination:

" The main concern is the health and welfare of those directly and intergenerationally affected by leprosy - they hold the sanctity of what happened and are key to the preservation of Kalaupapa, and they need to be the ones in partnership with others to decide how to take care of this place, our people, and to determine what stories they want to share, when and with whom.

" On page 57 a statement is worded, Preservation and interpretation of the settlement will be managed and performed by patients and native Hawaiians to the extent practical. It is not about practicality but what is just; and what is just is that the patients and (native Hawaiians) K naka Maoli are the only ones who have rights to the issues of preservation, interpretation, management and performance.

" The constant reiterations about the various partnerships and cooperatives consulted in the process included many religious and Hawai i State run agencies. When their concerns and preferences are placed above that of Kalaupapa and K naka Maoli, this process and those involved are violating our rights as a people to self-determine processes and therefore outcomes concerning our homelands and our health.

" Having volunteers and service groups partner with National Park Services potentially eliminates K naka Maoli from the negotiation and active process of either being the host of Kalaupapa or the beneficiary of the connection with land, place, and the sacred nature and work. WE ARE BOTH OF THESE, and the current DGMP and EIS need to address these facts and identify and measure the adverse impact felt by Hawaiians by removing us from the equation.

4. Food Security & Aloha ina Survival

" Similarly to work service and connection to ina, if homesteading is recommended against, this process, NPS, DHHL, DLNR, DOT, private land owners and the State contribute to the planned starvation of K naka Maoli and the general public on Molokai in particular, and the implicate Kalaupapa in the process as well.

" Using past tense quotes like The peninsula of Kalaupapa was once home to a thriving Hawaiian community, and appreciating the ways in which native Hawaiian communities flourished in the Kalaupapa region and its valleys for hundreds of years, shows attempts by various State agencies and the National Park Services to erase from probability the opportunity that Hawaiians can and do exist in this manner today.

" In Chapter 6, comments suggested more inclusion of the people who inhabited places like Kalawao and Waikolu Valley before they were bought out unfairly or forcibly made to exchange land. The descendants (who reportedly were consulted) of the original inhabitants in these areas have the right to carry on what their families were forced away from, and the park should be working to meet to their needs of survival instead of limiting their ability to live like their ancestors and provide for their families. People of Molokai are exceptional and do not require assistance from DHHL to make roads or facilities for their homesteading.

" Saying that Though still a living community, Kalaupapa is also appropriate ground for archeological research, means that the DGMP and EIS value the survival and continuance of Western research over K naka Maoli subsistence. This needs to be examined and corrected to honor the descendants of Molokai and all of Hawai i who have already and continue to be adversely impacted by Western forms of value and misinformation.

" Already with the 8,725 acres of land and 2,000 acres of water held in management mainly by NPS, it is an irresponsible use of fertile land to recommend against homesteading on an island where the future of all people on Molokai and in Hawai i depends in large part on the cultivation of our own food. The proposed talk of acquiring

Correspondences - Kalaupapa NHP General Management Plan and EIS - PEPC ID: 24883

through purchase or donation an additional 5,259 acres from Pelekunu Preserve and 7,341 acres from Pu u O Hoku Ranch for total of 21,325 acres of land being managed for high quality visitor experiences is dangerous and severely lacking in social justice, food security planning and forethought.

In addition to these comments, it is strongly suggested that:

" The main concerns in the next DGMP and EIS and subsequent planning are identified from a Kanaka Maoli health practitioner lens - where health and healing are top priorities for the protection and safety of Kalaupapa and those affected by its stories

" A new designation (i.e. in trust to an appropriate Hawaiian community) for what is currently Kalaupapa National Historic Park be discussed so that current, appropriate protections are maintained and that subsequent measurements and planning include the health related concerns already mentioned (also see below)

" New partnerships be made to include community groups as integral voices in the planning process similar in level and stakeholder value to entities like NPS, DOT, DOH, DHHL, DLNR (i.e. similar to Hui Ho opakele Ainas recommendation to establish task forces and community commissions)

" Additional entities be contacted for their expertise concerning historical trauma, community health, Indigenous health, self-determination, sustainability and food security for additional sections that need to be added into future DGMP(s), EIS(s) and planning (i.e. Indigenous and Native Hawaiian Public Health, Hawaiian Studies, Hawaiian Language, Sust INA ble Molokai, Movement for Aloha No Ka Aina)

" Measured IMPACTS include:

1. Sovereignty

i. Dignity

ii. Self-determination

iii. Hawaiian rights

iv. Social Justice

2. Public Health

i. Hawaiian Health

ii. Stigmatization, Criminalization & Arrest, Separation & Displacement, Experimentation

iii. Historical Trauma

iv. Food Security

Thank you for the opportunity to talk about these concerns. In addition to the work, discussions and research already presented, these matters are just as valuable and vital to the health and recovery of Kalaupapa, the Hawaiian people, and all those who have a responsibility to this place we call home.

Aloha ina,

Meghan Leialoha Au

lomilomi & l au lapa au practitioner

UH M noa, Hawaiian Studies MA candidate

[REDACTED]

">

Kalaupapa National Historical Park

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



62 Thompson - 6.10.15

Comment Form

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JUN 10 2015

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I agree with the selection of Alternative C, and comment that permitting paved roads to return to gravel would be consistent with the historic nature of the area (\$save money!). I also hope that in time a visitor center (or other orienting contact facility) topside Mokolai - probably within Palua State Park will be developed. The NPS's relationship with 'topside' Mokolai will be enhanced with the development of a fully staffed contact facility near the trailhead, as likely will acceptance of future boundary modifications.

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Name:

Peter Thompson

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Kalaupapa National Historical Park

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Mahalo for asking for our Thoughts. I agree that Alternative C is a good direction for us to go. I would like to see tourism limited and restricted to by tour only - so no unescorted tourists please.

I appreciate the NPS' approach to this planning. I think with everyone's voices heard we can keep Kalaupapa alive long after the people that were forced to live there have passed on. Together we can honor them.

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Name: Yvonne Geesey

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In reviewing the GMP and EIS for the KALAUPAPA NATIONAL HISTORICAL PARK, for the most part, I like what I read in ALTERNATIVE C but have some reservations in the areas not addressed by the GMP: I) preservation of grave sites, II) future visitation privileges by descendants of patients/residents of Kalaupapa, III) accessing burial sites, and IV) accessing records compiled by KA UHANA 'O KALUPAPA organization. Preservation sites within NPS jurisdiction, should be considered as important as the preservation of structures. Regarding KA UHANA 'O KALUPAPA IN A DISCUSSION on how to Partner with the organization would be great.

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Kalaupapa National Historical Park
(808) 567-6802, ext. 1100

Leslie Kanoa Naeole, Management Assistant
Kalaupapa National Historical Park
(808) 567-6802, ext. 1103

MAIL:

National Park Service
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909 First Avenue, Suite 500
Seattle, WA 98104

E-MAIL:

KALA_GMP@nps.gov

GMP PROJECT WEBSITE:

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Space for additional comments:

I look forward to a 'Partnership' between the National
Park Service and Ka Uhana 'U Kalaupapa organization,
whose 'cause' is to memorialize the 8,000 plus victims
of Leprosy buried in Kalawao and Kalaupapa.

To share in the Cultural and Historical plans in
preserving the Settlement's existence would be of
exceptional, educational value which will ensure that
Kalaupapa will be a Place (Wahi Pana) of reverence and
dignity.

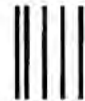
buildings and structures deteriorate in time, but our
beloved ancestors, whose bones lie there, will remain
for generations to come.

'UA MAU KA EA O KA AINA IKA PONO'

'THE LIFE OF THE LAND IS PERPETUATED IN RIGHTEOUSNESS'

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Kalaupapa National Historical Park

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63 Swingle 6.10.15

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Plan B seems more appropriate. Limit of 100 should stay in place. Children of high school age permitted as part of their schooling. No development of public lands! Cultural practitioners such as luhala weavers, tapa cloth makers etc. should be permitted to gather needed materials to keep their crafts alive & pass on that knowledge.

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Name: Artice Swingle

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KALA_GMP@nps.gov

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Space for additional comments:

Future plans should NOT permit
subcontracting to outside
agencies to develop income
from off-island entities to
provide impressions ranging
from trinkets, food to
housing or tour guides
with little or no awareness
of Hawaiian culture or
practices

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W. Inglis - 6.10.15

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I was present at public meeting on Oahu, 5/7/15. In my testimony I suggested that all written public comments be attached to final GMP. While I generally favor Alt. C, I do not support boundary amendments, proposed in both Plans B+C, to acquire parts of Halawa + Pelekunu Valleys. I am encouraged by NPS's intent to pursue partnerships with private entities - including the Ka 'Ohana o Kalaupapa, with its efforts to construct + maintain the Memorial and expand its "Restoration of Family Ties" Program throughout our islands and beyond. I look forward to future opportunities to participate in the final GMP.

Aloha!

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

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Name: WALLY INGLIS

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65 Evanson 6.11.15

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"In 1980 Kalaupapa National Historical Park was established to preserve the natural and cultural aspects of the peninsula and to maintain the home of the remaining residents"

I have visited Kalaupapa many times. I have walked around the peninsula once with an archaeologist - I know the many historical and cultural treasures that are there. Treasures that must be preserved for future generations.

The National Park should not expand Kalaupapa boundaries at this time - maybe in 15 or 20 years there is too much to be done with what is there now. I therefore ask that Plan D be implemented.

Thank you

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Name: Mary Evanson

E-mail (required for e-mail list only):

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Newsletter #4: Spring 2015

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Dear National Park Service,

I am impress with the data preparations for this Draft Management Plan and Environmental Impact Statement book. This picturesque portrait from its covers to the inside and through it, has great photographs of people who had the Hansen Disease from both Settlements Kalaeso the first and Kalaupapa the second. The North Shore cliffs are considered the tallest in the world. They stand like sentinels watching constantly. This pristine (unspoiled) serene and majestic is an awesome piece of nature's artistry.

It was stated in the Draft Plan that Kalaupapa NHP never had a

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E-mail (required for e-mail list only): _____

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City, State, Zip: _____

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Space for additional comments:

*formal management Plan, therefore, the proposed
setg actions and programs initiated in the preferred
alternate is designed to be the first formal Management
Plan of Kalaupapa National Historical Park.*

*I support and accept NPS's preferred
alternate because you will have the GMP (General
management Plan) and compliance is the directive.
You will have over 15-20 yrs. to find out whether the
GMP has merits. Back up plans are something to
consider when changes are needed and flexible.*

JK
June 3, 2015

Respectfully Submitted,
Leslie Kanoa

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HISTORIC HAWAII FOUNDATION

JUN 10 2015

June 2, 2015

Erika Stein Espaniola
Superintendent
Kalaupapa National Historic Park
c/o National Park Service
ATTN: Kalaupapa NHP GMP/EIS
909 First Avenue, Suite 500
Seattle, WA 98104

RE: National Historic Preservation Act (NHPA) Section 106 Consultation
Kalaupapa National Historical Park General Management Plan and
Draft Environmental Impact Statement

Dear Ms. Espaniola,

Thank you for providing the opportunity to comment on the General Management Plan (GMP) and Draft Environmental Impact Statement (EIS) for Kalaupapa National Historical Park (KALA), and to participate in the consultation process under Section 106 of the National Historic Preservation Act (NHPA) for this undertaking.

Since 1974, Historic Hawai'i Foundation (HHF) has served as the statewide preservation nonprofit with a mission to preserve and encourage preservation of Hawaii's significant historic places. Historic Hawai'i Foundation is a consulting party to the National Park Service (NPS) under the NHPA Section 106 (per 36 CFR 800.2(c)(5) as an organization with a demonstrated interest and concern with the undertaking's effect on historic properties), and regularly participates in the Section 106 consultation for Kalaupapa.

Comments on the General Management Plan

Historic Hawai'i Foundation involvement in the development of the Kalaupapa GMP has included:

- Attendance at the GMP public meeting, June 10, 2011
- Site visit to Kalaupapa National Historical Park, May 15-16, 2014
- Attendance at the GMP public meeting on May 8, 2015, and
- Participation in an online GMP Section 106 meeting on May 14, 2015.

HHF has reviewed the GMP and Draft EIS document. We understand that the General Management Plan provides guidance on NPS management actions for the next 15-20 years as

Historic Hawai'i Foundation Comments
Kalaupapa National Historic Park GMP
June 2, 2015
Page 1 of 3

Kalaupapa transitions from Hawai'i State Department of Health (DOH) Management. DOH will leave Kalaupapa when there are no longer patients remaining.

The GMP provides four alternatives in how NPS will manage the site, summarized as:

- Alternative A is the no action alternative, which continues current lease agreements but provides no guidance for the future.
- Alternative B provides guidance for the future that would include increased outreach, and continue very limited public visitation to the site.
- Alternative C, the NPS preferred alternative, provides guidance for the future and focuses on stewardship. Additional staff would be hired to manage increased visitation. Funding would be directed to the rehabilitation and maintenance of historic structures for use by visitors. Visitors would be restricted to particular areas of the settlement to protect cultural and natural resources.
- Alternative D would open up the entire peninsula to visitation based on an "immersion experience." This is the most intense of the alternatives.

No new construction is recommended in any alternative. Common to all alternatives is the NPS mission to protect and perpetuate cultural and natural resources.

HHF generally agrees that the NPS preferred alternative (Alternative C) would best protect the integrity of the National Historic Landmark and its contributing historic buildings and cultural resources. Alternative C focuses on stewardship of the peninsula's cultural and natural resources.

HHF is supportive of utilizing historic structures and creating uses for buildings that may otherwise be neglected if not placed into service with an identified use and preservation/rehabilitation plan. In addition, volunteer and work group overnight trips would continue and expand. Partnerships with land owning agencies and other community organizations, such as Ka 'Ohana O Kalaupapa and Hui Mālama Makanalua, are a highlight of this alternative. Increased levels of staffing to manage visitation would allow more people to access Kalaupapa.

However, HHF is concerned that Alternative C may go too far in lifting the cap on the number of allowed visitors and current restrictions on access. We recognize that a balance must be found to share the history of Kalaupapa with visitors for continuing education, stewardship and inspiration; however, it is imperative to do so in a way that does not degrade the spirit and character of this unique and special place.

To address this concern, Historic Hawai'i Foundation would like to see an expanded discussion and more specificity to the criteria and limitation to visitor use and experience for Alternative C. HHF is supportive of elements of Alternative B, including options for an extensive offsite outreach program to share the history with a wide audience, a presumption of lower limits on visitation, and careful restrictions on visitor access.

Therefore, Historic Hawai'i Foundation would like to see a hybrid between Alternatives B and C related to visitor use and experience. In circumstances where there is a real or perceived conflict between visitor access and preserving the feeling and intangible aspects of integrity, the management should lean towards retaining the spirit of Kalaupapa. Rather than have an open-ended approach to visitation, some experiential limits and triggers should be included to guide carrying capacity and visitor management, or to impose a quantitative cap on numbers of visitors if a qualitative measure is too elusive.

NHPA Section 106 Comments

Kalaupapa National Historical Park management and operations rely on the 2008 Nationwide Programmatic Agreement for the National Park Service. A major concern HHF heard voiced at the community meetings and the online meeting was that individuals and organizations felt that they were not given opportunities to consult on projects in Kalaupapa. Historic Hawai'i Foundation feels that this topic should be addressed in the GMP. Although consultation is addressed through the Nationwide PA, Kalaupapa has additional stakeholder groups, including family members and descendants of patients; Native Hawaiian Organizations; and both local and statewide preservation organizations (including HHF).

Therefore, HHF encourages a park-specific Programmatic Agreement to address actions specific to Kalaupapa. A specific PA could incorporate relevant sections of the Nationwide PA, such as streamlined review for additional maintenance activities.

Historic Hawai'i Foundation supports the continued and expanded agreements, leases, and acquisition from land management agencies other than Park Service on the Peninsula. In addition, NPS will presumably be developing topic-specific plans to address concessionaires, visitor management, recreation, aviation (airport management as well as fly-overs), harbor management and other operational issues. These agreements will change over time and we encourage consultation for these land management decisions be covered in a Kalaupapa-specific Programmatic Agreement.

Thank you for the opportunity to provide comments on the NPS GMP/EIS. Please continue to include Historic Hawai'i Foundation in the Section 106 consultation for this undertaking.

Sincerely,



Kiersten Faulkner, AICP
Executive Director

68_Boland_6.10.15

JUN 10 2015



Erika Stein Espaniola
Superintendent
Kalaupapa National Historical Park
Kalaupapa, HI 96742

Kalaupapa GMP Team
909 First Avenue, Suite 500
Seattle, WA 98104

Dear Erika and GMP Team,

I am co-addressing this since I think that if Erika agrees with any of my comments, her endorsement would carry more weight than if things are just coming from me.

Thank you for sending me the Executive Summary and the whole document. It is impressive. For nearly 50 years I have had a deep interest in Kalaupapa and a connection to some of the remarkable people there. I appreciate all the work that has gone into the plan. It will occupy an important spot on my bookshelf, although already 2 pages have fallen out as a result of my tender attention.

I mostly agree with the selection of Alternative C. I will make some comments.

1. Ka `Ohana O Kalaupapa. My term on the `Ohana board has expired, so these comments should not be construed as representing the `Ohana.

To be blunt, it is disappointing that the `Ohana has been given such short shrift in the document. The `Ohana has been deeply involved with Kalaupapa, its people, their families and its story for the last several years, and will continue to be in the future. It has many accomplishments. The Kalaupapa memorial ensures an additional important role in the future.

I hope the `Ohana will submit its own detailed testimony.

The `Ohana is a resource that the Park can use to further both groups' common purposes, and I am optimistic that relations have improved to the point where both can collaborate for the common good.

Partnership and short/long-term agreement. Although it is suggested on page 226 that the `Ohana is a partner, somewhere the plan should specifically state that the `Ohana is a partner, or at least is expected to be one soon. The plan should specifically state the Park's intent to develop a written agreement with the `Ohana, short or long-term, as soon as possible. I would hope that such an agreement can be developed even before the plan is finalized.

P.L 111-11. Pages 349 to 373 of the plan, Appendices B and C, list hundreds of laws, executive orders, director's orders, policies, etc. affecting the Park. I cannot find a mention there of P.L. 111-11, although it is mentioned in the text. Perhaps it is there somewhere, but I have overlooked it. This is the law which provides for the 'Ohana's establishment of the Kalaupapa Memorial, and it will be a major undertaking in the Park. It will be one of the most visited sites in the Park, especially by family members.

I suggest that Section 7108 of P.L. 111-11 be fully quoted somewhere. It is relatively short, but important. It might be included as its own Appendix, since it doesn't seem to fit any of the existing categories in Appendices B and C.

Interpretation and education. P. 117 describes outreach programs which might be developed, such as school curricula and traveling exhibits. The 'Ohana already has extensive experience and accomplishments in these areas, which should be mentioned in the plan. These are areas where cooperation between the entities can produce a greatly beneficial synergy. The plan should include an expectation of cooperation in these areas.

Clarence "Boogie" Kahilihiwa. Mr. Kahilihiwa is listed on page 338 as one of the preparers and consultants for the plan. He is listed as a subject matter expert. Mr. Kahilihiwa is also the president of Ka 'Ohana O Kalaupapa, and I suggest that that title be added to this listing. I spoke to him on this and he concurs.

2. Visitor Use and Experience. I generally support the proposed visitor provisions beginning on page 117. They certainly support the purposes of the law establishing the Park.

Number of visitors. The number of daily visitors should be increased from the current 100. I suggest that limits be set from time to time, perhaps annually, based on experience.

Orientation and entry pass. This is an excellent proposal. Since visitors would be arriving at different times, there might be some sort of video played periodically, or on demand, at Paschoal Hall. There would need to be a Park person there to manage the presentation, answer questions and issue the passes.

Not requiring a repeat orientation for repeat visitors is also a good idea.

I would suggest one exemption, and that would be for guided tours. The current guided tour runs about 4 hours, with its beginning and ending times determined by airline and mule schedules. Visitors on the guided tours will only have a short time in the Park, and since a guide accompanies them all that time, the guide's presentation should orient them satisfactorily. The plan should at least suggest this as a possibility.

I might also suggest that there be some sort of video program available at the airport. There are times when visitors on the tour have long waits at the airport, and this is an opportunity to orient or educate them. In past years there was such a program, with State Department of Transportation (DOT) staff turning the program on and off. There will probably be a Park person stationed at the airport anyway to welcome and direct visitors, and that person could take on this job.

Age limit. It is also a good idea to drop the age limit of 16 when there are no resident patients left, or when the remaining patients and the State Department of Health (DOH) agree. It will be important for children, especially patients' families, to be able to visit the Park and learn of its history and stories.

Overnight use. I support the proposals for overnight use for groups, families and individuals. I previously recommended specific reference for religious retreats, and I think the language in the plan would allow that. There are other groups such as the students in the Imi Ho'ola program at the University of Hawaii which visits annually. They have been spending 3 or 4-day weekends at the lighthouse cottages, and I hope they, and similar groups, can continue to be accommodated.

Unescorted access. I strongly support the provision allowing visitors who have been oriented to have unescorted access to certain parts of the Park, especially to Kalawao. People need to go at their own pace and spend whatever time they need at certain places, especially the powerful places such as Kalawao.

However, I recommend that the engagement zone in Alternative C be expanded to include:

- Iliopi'i Beach.
- The lighthouse area, although not necessarily the inside of the lighthouse unless staff is available. I note that this area was included in the otherwise more restrictive Alternative B.
- The makai side of the "back road" from Kalawao all the way around to the lighthouse. This area would allow visitors to access the old boom, the "old lady's cave," the stone arches on the coast beyond the beach house, a good view of the stone wall between the ahupua'a of Kalawao and Makanalua, and the stone structure at the end of the wall. I have heard different descriptions of the use of that structure, but it is an interesting archaeological feature. There would need to be educational signage in different places, and signage prohibiting unescorted access to the mauka side of the road. This would protect the lava tube caves near the beach house and other archaeological sites from being disturbed.

Air access. I support the proposal to limit aircraft to 9 passengers if larger aircraft would require the construction and staffing of more buildings at the airport.

3. Concessionaires. On page 110 there is a statement that seems to say that P.L. 95-565 provides native Hawaiians with the right of second refusal for revenue-

generating services. I do not see that in the Act, and the statement might need to be amended. Probably, as stated on page 84, this provision is in the lease with DHHL.

If possible, I suggest the right of second refusal should go to descendants and family members of patients, most of which will have some Hawaiian ancestry. This might require amending the lease with DHHL. The right of third refusal would then go to Native Hawaiians, who are defined in the plan as at least 50% Hawaiian, but who might not have family connection to the patients.

4. Concessionaire Privileges. If there are concessionaires doing business in the Park, they will probably need housing and other privileges. The plan should provide for the beginning of discussion on these issues, even if decisions are still far off.

5. Political status. As the plan points out, Kalaupapa is a separate County, the County of Kalawao, and is under the administration of DOH. The plan further points out that this issue will need to be addressed when there is no remaining resident patient and there will be no need for DOH at Kalaupapa.

There are a few possibilities here. The County of Kalawao could remain its own political entity, but I doubt if the DOH would want to keep responsibility for the place when there are no patients and no DOH people there. Perhaps DOH and the Park could make an agreement by which the county remains under DOH in statute but is somehow operated by the Park.

A more likely possibility would be to make the place part of Maui County. This would require an amendment to the State law, and would bring up all sorts of issues, e.g.: County voting privileges, motor vehicle licensing, safety checks, liquor regulations, gasoline taxes, county services, etc.

I suggest that the plan specify the convening of a group sometime in the future to begin discussion of this issue. The plan would identify the players, e.g. DOH, KNHP, the County of Maui, DHHL, appropriate legislators, etc. We would not expect the issue to be solved in the near future, but at least the discussion could begin, the groundwork prepared, and perhaps even some preliminary consensus reached.

6. Resident Privileges. In the long-term, the resident staff will include Park personnel, DOT personnel, probably concessionaires and perhaps others. The plan should provide for a process to identify and begin discussion of related issues. For example, how will housing be allotted? Will the residents pay rent and utilities?

7. Families. I have a radical suggestion. The plan should provide that, in the long-term, residents will be allowed to have their immediate families (spouses, children) living with them. This might put a strain on the resources, but this could be at least partially resolved by increased rent payments, freight charges for goods flown or barged in, etc. Of course, there would be no school for the children, but they could be there on weekends and vacations. I think this would benefit the community,

making it more normal and more stable. It would also be fairer treatment to the residents, who now must bear long separation from their families unless they are likewise employed.

7. Clergy Housing. Currently there is a resident Catholic priest in a rectory which is owned by the State (I believe). The plan should specify that housing will continue to be provided. Further, if Protestant or Mormon clergy return, they should be allowed to use the houses previously provided.

8. Hunting. I recommend the plan specifically state that, in the long-term, non-resident hunting in the lower elevations of the Park would be banned entirely. Hunters could continue to have the same access they have now to the higher elevations. Hunting would be allowed for the residents, such as it is now, or for hunters brought in to control the deer and pig population. Coming in to the Park to hunt is entirely inconsistent with the purposes of the Park.

9. Fishing and Gathering. Residents of the Park should continue to have the same fishing and gathering rights they now have. I would recommend that non-residents, even those who are guests of residents, should not be allowed to fish. This seems a recreational activity inconsistent with the purposes of the Park.

I am less certain about gathering rights. These might be traditional Hawaiian practices that might be reserved for persons of Hawaiian ancestry.

10. Expanding the Park. The boundaries of the Park should not be expanded to include the North Shore areas described in the Plan. Again, including these scenic and wild areas in the National Historic Park would be inconsistent with the purposes of the Park, whatever the merit of preserving them.

I would have less objection to the establishment of the North Shore Cliffs National Preserve as a new unit in the Park system, as long as it was clear that it is a separate thing from KNHP.

I am concerned about the plan to have the KNHP staff "manage" the area, under either option. The Park staff have enough to do without adding new responsibilities. If the proposed Preserve is to be managed by KNHP staff, additional staff should be added and the plan should identify their positions and added cost.

Thank you for the opportunity to submit these comments.


Patrick Boland

[REDACTED]
June 4, 2015

JUN 10 2015

To Whom It May Concern:

I am writing in regard to the proposed changes for Kalaupapa and Kalawao. I attended a community meeting where the information was presented. Although all 4 options were listed, the staff from the National Park Service (NPS) gave only cursory mention of Plans A, B and D, and spent an inordinate amount of time detailing and promoting their Plan C, "the preferred option." It appeared to be more of a campaign of what they want and will likely be implemented regardless of our concerns.

I am a direct descendant of a Kalawao and Kalaupapa resident. My great great grandmother (kupunahine), Keoho contracted leprosy and was sent to Kalawao (the first settlement, prior to Kalaupapa) in the mid to late 1800's. Her husband, David Pō'ai, joined her as her kokua. My great grandmother, Annie Keoho Pō'ai, was born in the settlement along with her siblings and at the age of 9 years old was taken from her parents and family and raised in a Catholic orphanage on the island of O'ahu. As an adult, she frequently visited with her parents, making the long trek by foot down the 3-mile switchback trail. She made the trek while pregnant with her own children; going into labor while climbing the 3-mile steep trek back to topside, where on one occasion she delivered my grandmother, Rose Enomoto, and another time delivering my great uncle Toshi Enomoto. Also, my great uncle, Waldemar Muller and his twin sons, my father's first cousins, Karl and Paul Muller built the airstrip on Kalaupapa and many of the walls on the settlement.

As you can see, my ties to the region, as many of Kanaka Maoli (Hawaiian) ancestry can claim, are familial and regardless of the passage of time, remain strong and poignant. When I visit the area to pay respects to my kupunahine, who is buried in the potters' field, it is with great sorrow that commands solemnity and respect. Although Kalaupapa is primarily associated with leprosy, which seems remote in our modern world of medicine and which today is accessible and civilized, it was not so when she was interred there with her husband. When I look out upon the ocean vista that is undeniably beautiful and scenic, I cannot help but see the potters' field at my feet where my kupunahine's precious bones lay. You must understand that to our people, the bones are sacred. They hold the mana, the very essence of who the individual was and is. Turning her home and final resting place into a tourist attraction is demeaning and disrespectful. In the religious sense, it's sacrilegious. That is what the proposed and "preferred plan" is - creating a tourist attraction out of Kalaupapa - creating a playground on a graveyard. Would you do this to your grandparents' graves? Why is it okay to do it to others'? I do not support the changes proposed for Kalaupapa and Kalawao.

I listened to Erika Espinola, spokesperson for the NPS, tell us that under their "preferred plan" the 100 person per day limit will be increased at "their discretion." The under 16-year-old limitation will be removed. Their explanation for this was that these limitations prevent "visitors" from accessing the site. What they meant was that it limited tourists (non-locals) with children under 16 years from visiting. They see an untapped potential for income. They claimed that by allowing children to access the site, they could begin educating them at a younger age. How silly of an excuse. Young children, in general, have no interest in Leprosy or any disease for that matter. And if they truly did, that small handful of children can now access a wealth of previously difficult to access information in the comfort of their own home through the Internet. If their interest is true and sincere, then they will be looking forward to one day visiting Kalaupapa once they turn 16 years old.

Ms. Espinola also said that children would not be allowed at the site except under the supervision of their parents or other adults in their party. This is to ensure that the children remain respectful of the area. Seriously? Has Ms. Espinola or anyone else with the NPS gone to Walmart, Costco, the Zoo, or even another National Park lately? Have you seen the children that are supposedly under "adult supervision?" The reality is that young children at Kalaupapa are more likely to pick up and throw stones, break branches, throw tantrums, scream, cry and basically disrespect the sanctity of Kalaupapa and Kalawao all while under "adult supervision." I do not support changing the restriction to allow children under 16 years of age.

I believe that keeping the cap at 100 visitors per day or less should remain in place. More visitors mean more waste, both in physical trash and in sewage. By limiting the number of persons per day, the cleanliness and sanctity of Kalaupapa and Kalawao are more likely to be preserved. I do not support expanding the visitor cap to more than 100 persons per day.

The NPS plan wants to allow overnight access for general use. This is unsupervised access, which means the greater potential for desecration under the cover of darkness. I do not support overnight access for general use.

One plan is to also allow unsupervised access to Kalawao and the crater. Again, I say no. Unsupervised anything, especially while allowing children access is a recipe for disaster. There will be much ruin to the natural beauty and tranquility of the area and to my and many others' ancestors' final resting place. Understand that it is the limits that are currently in place that make Kalaupapa and Kalawao the wonderfully serene and peaceful place that it is. This must not change.

Ms. Erika Espinola stressed that without creating a tourist attraction, there wouldn't be any funds to repair or renovate the existing structures and no money to create a visitor center or provide bathroom facilities. The visitor center and more bathroom facilities are not needed and funds can be raised through donations to repair any existing structure in need.

I do not support any of the changes proposed by the National Park Service. I support plan A, which is to keep things as they are with all the current restrictions in place. I support donations and private funding for needed repairs and believe the NPS should be focusing their efforts on this. Kalaupapa and Kalawao have restricted access for a reason and the NPS did not show any compelling reason to change that. It was quite obvious that the changes proposed are for the sole purpose of financial gain; once again turning that which is sacred to Kanaka Maoli (Hawaiian) into fun and games for the wealthy tourist who can afford a family vacation in "paradise."

Our people were once victimized by being ripped from their families, forced on a death march from the docks of their embarkation to being dumped into the shark infested waters and razor sharp reefs to either sink or swim while attempting to reach the shores of the Kalaupapa peninsula. If successful, they were then required to fight for food and their dignity while slowly being eaten alive. They were raped and brutalized by other lepers who were reduced to animalistic behaviors because of their treatment and circumstance. They died maimed and lonely on this remote land.

'Ohana - Family - is the core of our culture. Most had no one from their 'ohana to comfort them as they slowly succumbed to the disease. My kupunahine was fortunate to have her husband by her side, but they were required to leave their families behind and their children were taken from them to be raised in an orphanage. This is the history of Kalawao and Kalaupapa. It is their flesh and blood that saturates the soil. It is their bones that shore up the foundation. This is not a tourist attraction nor should it ever become one. My opposition is not to prevent access, but to maintain the access currently available. Those who understand the poignancy of this place are welcome to visit and share in the mana that permeates the air breathed here.

Me ke aloha a me ka ha'aha'a,

A handwritten signature in blue ink that reads "Pauline Pili'alo'ha Yap". The signature is fluid and cursive, with a stylized "Yap" at the end.

Pauline Pili'alo'ha Yap, DVM



70- 6-10-15
HAWAII
CONFERENCE

UNITED CHURCH OF CHRIST

28 May 2015

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

JUN 10 2015

Dear Friends:

RE: April 10, 2015, Formal Notification of Section 106 Consultation: Kalaupapa National Historical Park Draft General Management Plan and Environmental Impact Statement

Thank you for sharing the *Draft General Management Plan and Environmental Impact Statement* for Kalaupapa National Historical Park, and thank you for the opportunity to make comments through multiple channels, including public and on-line meetings.

The Hawai'i Conference United Church of Christ, which through its Hawai'i Conference Foundation is the steward of the Siloama Church in Kalawao and the Kana'ana Hou Church in Kalaupapa, supports the National Park Service proposal for the long-term management of Kalaupapa National Historical Park as outlined in Alternative C.

In particular, we affirm:

- The intention to make Kalaupapa accessible for guided and unguided visits with limitations on the number of visitors per day and the number of overnight guests.

Comment: This complements the plan that the Hawai'i Conference UCC has developed for its Kana'ana Hou-Siloama Church, which, after its last patient-member dies, will become a pilgrimage and spiritual retreat site with on-site staffperson serving as the minister and coordinator. Because of infrastructure and building capacities, the church itself would need to limit the numbers of persons that visit and stay overnight, and the church would be willing to do this in concert with NPS as a matter of good stewardship of the land and resources.

- The lifting of the age restriction to allow visitation by children when there is no longer a patient community at Kalaupapa.

Comment: The educational opportunity for children to experience a day visit would be invaluable. Many schools, from elementary to high, include the history of Kalaupapa in their curriculum, and an experience to see it firsthand would enhance the lessons, stories and connections.

- The protection and preservation of archaeological, cultural and historical sites.

Comment: This is important not only to be able to continue telling the story of Kalaupapa as a Hansen's Disease settlement, but also to be reminded of the long presence, lifestyle and culture of native Hawaiians who were living on the peninsula prior to the first patients' arrival and were gradually displaced and removed in the years immediately afterwards.

- The possible inclusion of North Shore preserve areas into Kalaupapa National Historical Park.

Comment: We believe that NPS is in the best position to manage these areas both for long-term preservation and for allowing native Hawaiian traditional hunting and fishing.

The Hawai'i Conference UCC has these suggestions or concerns about the proposed long-term management plan:

- Specify the religious communities, particularly the United Church of Christ and the Roman Catholic Church, as partners with NPS in the long-term stewardship of Kalaupapa. Both religious communities have made commitments to being present, including the on-going preservation and maintenance of our respective churches in both Kalaupapa and Kalawao.
- Acknowledge clearly that Ka 'Ohana O Kalaupapa is a participant in the management of Kalaupapa with regard to the Kalaupapa Memorial. Ka 'Ohana has received overwhelming support for its plans for the Memorial from Hawai'i legislators, Department of Land and Natural Resources, Kalaupapa patients, and the general public. The Memorial will be a significant site and an important way for future visitors to learn and understand the history of Kalaupapa, to find the names of ancestors patients, and to connect personally with the stories and experiences of so many who lived and die there.

The Hawai'i Conference UCC remains appreciative of what the NPS has done at Kalaupapa since 1980. We now look forward to on-going collaboration in the management and care of Kalaupapa for future generations.

Sincerely,



Charles Buck
Conference Minister

Kalaupapa National Historical Park

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



71 Jones - 6.10.15

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 ENCLOSED PAGES

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: _____

E-mail (required for e-mail list only): _____

Address: _____

City, State, Zip: _____

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.

|||||

29 May 2015

KALA GMP/EIS

Aloha & Greetings National Park Service Management, Administration, & Staff:

I am Don Jones formerly five years Hawaii DOH Administration with Kalaupapa Settlement of the 1980's. Former KALA NHP Volunteer three months early 2010. Former Sitka NHP Volunteer 2010-2011. Very long ago former staffer Redwood NP during the early days of that Park.

I first came to Kalaupapa Settlement in 1978. A very contrasting patient community from what we might see today ? I was with DOH Kalaupapa Administration when the first NPS resident staffer Henry Law arrived late 1982- early 1983. Needless to say I got to know the patient community & their concerns very well during my time at Kalaupapa Settlement. A number of members of the patient community became my employees. A few of these patients are still resident at Kalaupapa today.

So the focus of my comments relative to the KALA GMP/EIS will be directed toward the interests of the patients, their families, heritage, & legacy today. Also their friends & supporters including Native Hawaiians in the greater community of Hawaii.

JUN 10 2015

As you may know, *Ka 'Ohana O Kalaupapa* was founded as a non-profit in 2003 by Kalaupapa patients, family members, long time friends & supporters. The presidents of the *'Ohana* have always been patients. The first *'Ohana* president a former employee of mine, Kuulei Bell. The current day *'Ohana* president Clarence "Boogie" Kahilihiwa I have known for many years. My friend "Boogie" speaks well for his people their concerns & their interests. I might add that eight of the twelve *'Ohana* Directors are Native Hawaiian.

Where I'm going with this is to recommend for the NPS KALA Management Team to gain the input & collaboration of the *Ka 'Ohana O Kalaupapa* ? Yes I understand that the *'Ohana* may not always

5/30/2015

5/30/2015

exactly agree with NPS plans & policies. Similarly NPS may not always exactly agree with positions taken by the 'Ohana. But please understand that the 'Ohana & its individual members do not intend to become your adversaries ? In my view the long range interests & goals of the NPS at Kalaupapa can be supported & enriched by cooperation & collaboration with the 'Ohana ?

Please give consideration to a 2009 *'Ohana Position Paper* written with the support of the patient community & the endorsement of the Board of Trustees for the Office of Hawaiian Affairs, among others. Please note also the progress made by the 'Ohana in development of the "*Restoration of Family Ties*" program to Kalaupapa. Recognition from the *Historic Hawai'i Foundation* for the 'Ohana's work in bringing the history of Kalaupapa to U of H Manoa, community colleges, museums, public places. Now promoted as history for schools through out the state.

As a National *Historical Park*, KALA NHP could have much to gain by mutual support & collaboration with *Ka 'Ohana O Kalaupapa* ?

What of the Kalaupapa Memorial Project ? I was there at KALA NHP working as a 2010 Volunteer at Kalawao archaeological digs in site preparation for the planned Kalaupapa Memorial ? In five+ years since, what has been the progress with a Kalaupapa Memorial ? Should that not be included in all alternatives for the GMP ?

Further I would encourage KALA GMP/EIS to include all the interested parties relative to the Department of Hawaiian Homes Lands ? DHHL beneficiaries need to be a part of the discussions ? Even more so than the officials of the DHHL ? When/if decisions are made that might be perceived as adverse to their interests, parties not included in discussions ^Amy feel very "left out" ?

Thank you for offering opportunity for comments & input preparation to a KALA GMP/EIS. Best wishes for development of the best possible KALA GMP.

Aloha,
Don Jones



Kalaupapa National Historical Park

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



72 Freedman 6.10.15

Comment Form

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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.

- A. ~~To publish a 28-pg. booklet without once mentioning Father Damien--with every other country reverend for more than 100 years-- is not to be a good steward of Molokai, Kalaupapa Settlement, HD patients and sainted workers... or of history, itself.~~
- B. ~~The "scoping" meetings to the public should be recorded. In these modern times, nothing could be simpler--if the public input is to be valued, or even preserved. To write notes with colored markers on huge sheets, taped to the wall is cockamammy: not once was anybody trying to read them (that I noticed). Cost is negligible here.~~
- C. ~~On May 7th, the scoping input was allowed, by majority demand, to dispense with the "4-corner" discussions with a NHP staff--and to have each in their turn, speak with the microphone, to the entire group (of 50-60). It was orderly, respectful, eloquent, and so interesting, that no one seemed to drift out the doors. How we wanted this, from the previous times, when so much got missed, or lost. Thanks to Erika Espaniola, Superintendant: a positive sense of affirmation seemed to prevail.~~
- D. ~~The defeat of the use of erudite English throughout the report and presentation was a real drawback. The former patients stopped coming (from a staff member). It was "Ivory Tower Stuff", that was becoming incomprehensible. A few controlling residents had been in position of power--mainly those who were wealthier.~~
- E. ~~Where was the equality of Airfare pricing going to become a priority, with those able to speak to Govt. agencies? Why does one airline get all the wealty & profit, having the benefit of a grant--while another pays for each & every tourist, 100%?~~

☐ 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: Ruth Freedman RN

E-mail (required for e-mail list only): _____

Address: _____

City, State, Zip: _____

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.

HI 968
18 MAY '15

(1 of 5)

Kalaupapa National Historical Park
Newsletter #4: Spring 2015

Contact Information

CONTACTS:

Erika Stein Espaniola, Superintendent
Kalaupapa National Historical Park
(808) 567-6802, ext. 1100

Leslie Kanoa Naeole, Management Assistant
Kalaupapa National Historical Park
(808) 567-6802, ext. 1103

MAIL:

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

E-MAIL:

KALA_GMP@nps.gov

GMP PROJECT WEBSITE:

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

HONOLULU
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18 MAY '15
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**NATIONAL PARK SERVICE
PACIFIC WEST REGION - PLANNING DIVISION
909 FIRST AVE., SUITE 548
SEATTLE, WA 98104-9882**



JUN 10 2015

An Open Letter to the National Park Service Pacific West Region Planning Division

Why I am voting, and hoping for Option A:

1. Although declared a Historical Park-- in your 28-page booklet, you forgot the mention of Father Damien, not even once. What brought this place world attention?
2. In 10 years of living here, outsider camping, visiting, and fishing were next to impossible to control--even on our small scale. With kids we enable graffiti.
3. Very important, with this unique population: Clearly overlooked is understandable language for the locals. After studying this for a week, I was still flummoxed.
4. With an operating budget of millions--why not make an affordable airfare, bringing visitors' price closer to your own Federal and residents' discounted fare?
5. That would welcome visitors even more/ Plus the way that they are treated, by those not just profiting by visitors. (See your Japanese pastors' notes, of 5/7)
6. Have more frequent Oahu meetings that involve the public; and Molokai, too. Every 2 years' "scoping" seems to present us with Ivory Tower stuff.
7. You inserted Environmental Impact--maybe every NHP has to. Our best is Plan A.
8. Reach out to those who served Kalaupapa. It has sometimes seemed like a dynasty among patients, and even among workers. Some have found this a personal gold mine.
9. Change the way you record-- if you're really wanting our serious input. Valiantly scribbling on huge sheets in varied colors: is it read? Attributed? Or even kept?
10. You hired a transcriber, and mailed out voluminous pages--giving us 1 minute, after paying \$300 to fly in. The transcribers note, months later: "inaudible" I had a mik
11. Correct wrongful "dumping into the sea" film' perpetual lies. Even by the filmmaker coming from Australia. Fix it. [New Hope's refusal to do so, quotes that source.]
12. Sensationalism sells. Please be above that. Preserve and restore truth, as you do our research into our ancestors' graves.
13. Don't turn the Kalaupapa Memorial into a contest. That's money-making! Listen to every patient's wishes. Not all want their names advertised. (I know 5 who don't.)

5/15/15: Ruth Freedman RN

The Kalaupapa Historical Society

- 1) As a founding member of the Kalaupapa Historical Society (secretary), and a 10-yr. resident of Kalaupapa, we prececed the arrival of the NHP. Please document this, humble though it was. The year was 1980, and the officers were Ed Kato, pres, Kuulei Bell, and Henry Nalaielua. There were official minutes, vintage photos, guest speakers, and a newsletter.
- 2) Some of the speakers we were privileged to have were Fred and Keahi Robins (the lighthouse keeper & son), and Henry Law, coming aboard as the first NHS supervisor, Anwei Skinsnes (visiting as varied patients' guest for 2-wk. stays, interviewing the patients for their stories, and leaving recorders & tapes for their homework).
- 3) A staff member spoke on having gone to Belgium and Lourdes, representing all the patients. (In Belgium: laying 70 personal letter requests on the tomb of Damien; and in Lourdes: buying tall candles in their names, to burn before the shrine, in non-visitor winter months)
- 4) Richard Marks, of Damien Tours, spoke of the importance of saving Kalaupapa from real estate speculation and development. The best assurance would be to aspire to become a National Historical Park, he stressed. This caught the public favor as well. Anwei Skinsnes brought in a Star Bulletin photographer, who took many close-up photos of the patients--published in a center-spread (risking a \$500 fine, which did not occur). They were displayed in Paschoal Hall, with punch and St. Germain Bakery butter cookies, enjoyed by all. (Later, billed to the Kalaupapa Historical Society meeting.)
- 5) Henry Law presented a slide show of exquisite Kalaupapa photographs-- stating that his position as Parks Director enabled him to obtain the finest of photo equipment: with photos freely given to any residents, upon request. (Some are still awaited.) The movement to become a NHP was gaining ground.
- 6) The Hospital Gift Shop, (begun by Sister Wilma and a nurse upon the tour guides' request for their visitors, in 1980) began that summer, in the Old Hospital [off of the front door--across from the Historical Society office and vintage photo archives]. Each of 6 tour guides had a key to the gift shop-- with postcards, booklets, T-shirts, and patient-purchased memorabilia for sale, with everything on the honor system. (In the machine shop, a steel bedside-table's drawer welded open) stood in the corner, with nightly replenishing and restocking, with \$10 in change, never noticed short. Patients donated handmade items--promptly paid double their request which was labeled twice that amount (for slowed sale, and a showcase of what our own artists were capable of). Topside Molokai designed 4 T-shirts with Ed Kato's art-- a best seller, bringing patient-requests for their birthday gifts (always at cost price). Each year, the profits increased \$1000-- permitting more interesting item purchases, and international HD patient-made art: India cards, Thailand lacquerware, China's IV-tubing fish. Belgian tapestry...
- 7) The National Parks took an office building next to the Old Hospital, moving in books for the tourists. No competition intended, as it was only to be a Book Store. And the uniqueness of Kalaupapa NHP was that the Historical was to be the focus-- unlike most other national parks, preserving land for generations to come.
- 8) Gary Beito came to speak to the patient body. As Henry Law introduced him to all--"We are lucky--getting 'adopted' by another, richer NHP--the Arizona Memorial." And as Mr. Beito explained, the profit of Arizona Memorial's banks next to the free-admittance entrance, came to \$1 million a year profit. So even if little Kalaupapa was never to become profitable as other national parks-- the historical draw would be an educational inspiration to tourists. He requested, and received, (after a Buddhist priest's ceremony), the Buddhist Temple and its land, for the Kalaupapa Settlement NHP Bookstore.
- 9) An early morning fire occurred: Before the other islands could fly in their equipment, the Old Hospital and all records, supplies, Historical Society Office and Hospital Gift Shop plus storage, had burned to the ground. [c.1989]

Ruth Freedman RN
5/15/15

Natl. Park Service (Kalaupapa Mailing List, cont.)

[illegible][illegible]

Natl. Park Service (Kalaupapa Mailing List, cont.)

[illegible]

PEPC Project ID: 24883, DocumentID: 65196
Correspondence: 1

Author Information

Keep Private: No
Name: Harry Damian
Organization:
Organization Type: I - Unaffiliated Individual
Address: [REDACTED]
[REDACTED]
[REDACTED]
USA
E-mail: [REDACTED]

Correspondence Information

Status: New Park Correspondence Log:
Date Sent: 05/31/2015 Date Received: 05/31/2015
Number of Signatures: 1 Form Letter: No
Contains Request(s): No Type: Web Form
Notes:

Correspondence Text

I have been privileged to visit Hawaii a few times in my life. It is one of the most beautiful places on earth. I would like to recommend that area be kept as is with no commercial involvement. It would be great to allow Hawaiians to visit as part of their culture and for scientific use to preserve the precious resources.

I am Catholic, I would love to be able to go and see Where Fr. Damien worked with the lepers. However, I disagree with having it opened for people to visit. We can pray anywhere. Please leave the island be a beautiful reminder of the original Hawaii and its great Hawaiian people.

Thank you,

Harry Damian

">

DAVID Y. IGE
GOVERNOR
STATE OF HAWAII

SHAN S. TSUTSUI
LT. GOVERNOR
STATE OF HAWAII



JOBIE M. K. MASAGATANI
CHAIRMAN
HAWAIIAN HOMES COMMISSION

WILLIAM J. AILA, JR.
DEPUTY TO THE CHAIRMAN

**STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS**

P. O. BOX 1879
HONOLULU, HAWAII 96805



July 15, 2015

Ms. Erika Stein Espaniola
Superintendent
Kalaupapa National Historic Park
P.O. Box 2222
Kalaupapa, HI 96742

Aloha Superintendent Espaniola:

Subject: Department of Hawaiian Home Lands Comments on Draft
General Management Plan for Kalaupapa National Historic
Park

Mahalo for the opportunity to provide comments on the Draft General Management Plan (GMP) with the identified Preferred Alternative, Alternative C. A comment letter from DHHL on the Preliminary Alternatives was previously submitted on Sept. 27, 2011 (See Exhibit A, attached). We refer to that letter for background information on our 1,290 acres of land holdings within the Kalaupapa National Historic Park (NHP) boundary and our lease with the National Park Service (NPS) encumbering 1,247 acres within Kalawao County.

We appreciate your and your staff's participation in the first of two Beneficiary Consultation meetings that were held on Molokai on May 26 and May 27, 2015. We also appreciate the effort NPS has made to analyze our previous comments and provide responses to some of them in the narrative of the Draft GMP.

That being said, there are still some areas that have not, in our opinion, been adequately addressed or discussed in the Draft GMP:

Issues Identified in DHHL's Previous Comment Letter

MOLOKA'I ISLAND PLAN

1. Please discuss or reflect DHHL's previous request for consistency with the Molokai Island Plan, as follows:

- a. Identify potential existing facilities within or adjacent to these areas with the potential for adaptive reuse by beneficiaries to serve the functions listed below. The Preferred Alternative does not identify these community use areas as gathering places for cultural practices and access by native Hawaiians.
- b. Discuss how these areas could be licensed to an organization of native Hawaiian patients or our Homestead Association(s) to manage and operate.
- c. If the above requests are to be dealt with at the programmatic level or through a Cooperative Agreement or amended lease terms, then please state that explicitly in an appropriate section of the GMP.

Recommendations Based on Comments Received During Beneficiary Consultation

Based on the Beneficiary Consultation report that will be submitted to the Hawaiian Homes Commission for acceptance on July 20, 2015, the following recommendations are offered (See Exhibit B, "Beneficiary Consultation Report"):

Planning

1. Provide clearer and more complete definitions of the terms "stewardship," "enhancement" and "carrying capacity."
2. A stakeholder advisory group or task force should be formed to provide advice on transition strategies for the exit of DOH, as well as for implementation of the GMP and protection of traditional and customary practices and access rights.
3. There needs to be an analysis of a possible sunset date and exit strategy, based on best management practices, upon expiration of the GMP. The Department understands the need for long term planning and a programmatic framework, but encourages NPS to identify a specific implementation timeline within which program development will occur.

Homesteading

4. Beneficiaries are divided on the idea of opening up Kalaupapa to homesteading. There is much more support for the concept of encouraging beneficiary-focused stewardship of cultural resources and traditional agricultural restoration.

Management

5. Provide training and preparation for all job opportunities, including at the management level, in the NHP for native Hawaiians.
6. Hire native Hawaiian Cultural Consultants made up of cultural practitioners and residents of Kalaupapa or Moloka'i "Topside" to properly advise NPS on designing management initiatives with a "native Hawaiian lens."
7. Do not allow the U.S. military such as the Marine Corps to conduct training exercises on or over Kalaupapa NHP.
8. Calculate the carrying capacity of the peninsula and develop performance standards and thresholds that can trigger a reduction in daily visitor numbers based on quantifiable data, but maintain native Hawaiian preference for access.
9. Expand on the traditional NPS definition of "visitors" in order to create multiple tiers or categories that can accommodate the wishes of native Hawaiians, 'ohana of patients and lineal descendants of the original inhabitants in order to facilitate fostering the special relationship with place that these visitor subgroups desire.
10. Maintain a policy of first right of refusal for native Hawaiians regarding concessions, stewardship opportunities, and overnight accommodations, once patients are no longer living at Kalaupapa. Provide detailed information and training on how to meet NPS requirements for becoming a concessionaire.
11. Prior to the departure of DOH, as part of the transition planning process, explore possible reutilization of health facilities for rehabilitation, kūpuna assisted living, or

culturally-based health care programs with a focus on native Hawaiians, since such health facilities already exist.

Lease

12. DHHL and NPS are to initiate a formal negotiation to develop an MOU, Cooperative Agreement or modifications to the lease terms to manage the transition when DOH departs Kalaupapa, to specify how beneficiaries will receive consideration and priority for access to the NHP and participation in culturally based programming, and other items necessary to address beneficiary concerns raised during the DHHL beneficiary consultation process.

Boundaries

13. Beneficiaries do not support park boundary expansion to include the North Shore valleys of Waiho'okalo, Pelekunu and Pāpalau. In lieu of inclusion within the NHP boundary, DHHL encourages responsible government agencies to develop programs to reconnect native Hawaiians to the cultural and natural resources in the North Shore valleys, perhaps in partnership with DLNR and/or OHA.

Alternatives

14. Consider a hybrid alternative - keep a 100 person per day cap on general visitors as in Alternative B, but allow access for stewardship opportunities as in Alternative C, based on carrying capacity of facilities and infrastructure.
15. Incorporate a unique native Hawaiian stewardship component for both individuals and groups into Preferred Alternative C. A possible implementation measure is to develop a joint NPS/DHHL Special District & Community Use Implementation Plan for the areas identified for these two land uses in the DHHL Molokai Island Plan.

Access

16. There is a need to outline specific policies and guidelines to assure protection of traditional and customary practices within the Kalaupapa National Historic Park (NHP) as articulated in the Hawaii State

Constitution, Article 12, Section 7, such as subsistence fishing, ocean gathering and forest and stream gathering, including within the proposed area of park expansion.

17. Develop a cultural program to reestablish traditional Hawaiian recreational activities at Kalaupapa and Kalawao, such as surfing, after consultation with relevant stakeholders, councils, and agencies, as appropriate.
18. Identify a special access period (2-3 days/long weekend) to allow for exclusive native Hawaiian access to Kalaupapa.
19. Expressly allow for native Hawaiian gathering/access in Kalaupapa. Allow for accompaniment of adults by minors, once the patients are no longer residing at Kalaupapa.

Native Hawaiian

20. Ensure that the National Historic Preservation Act (NHPA) Section 106 Consultation for Kalaupapa and the North Shore is inclusive, rigorous rather than cursory, resolves any adverse effects to the satisfaction of the consulting parties in the form of an MOU, adheres to applicable rules (36 CFR Part 800) and is in keeping with the 1992 amendments to the NHPA.
21. There needs to be consistent outreach to "Topside" Molokai families to reestablish the histories associated with kama'āina formerly relocated during establishment of the Hansen's disease colonies with expansion from Kalawao into Kalaupapa.

Other Recommendations

22. As an alternative to the proposed Marine Managed Area surrounding the peninsula, adopt and support a Community-Based Subsistence Fishing Area model. Once all the patients and the DOH have left Kalaupapa, consider adding subsistence fishing and gathering as a component of the stewardship program. Exercise of traditional and customary practices by native Hawaiians could be managed by allowing beneficiary groups access in order to mālama the resources (practice stewardship), and in return allow volunteers to

Erika Stein Espaniola
July 15, 2015
Page 6

practice subsistence on the peninsula, in the spirit of kuleana (rights and responsibilities).

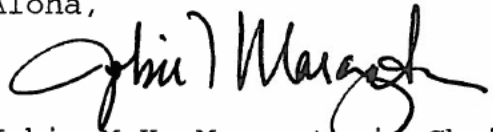
23. DHHL supports the maintenance and monitoring of the soundscape at Kalaupapa. Mitigation measures should include conversion to a fleet of electric vehicles, minimizing the time periods during which arrivals and departures of flights occur, and mitigating construction noise. It would be preferable to keep scenic tours by helicopter away from the park as well.

DHHL is hopeful that the above comments can be addressed and/or incorporated into the GMP to supplement the changes made to Preliminary Alternative C that increase the facilitation of stewardship and educational opportunities, with an emphasis on partnerships.

We thank you for the opportunity to provide comments. We hope these comments serve to clarify the mana'o provided by our beneficiaries, who along with DHHL have a strong desire to mālama the very special and spiritual place that is Kalaupapa.

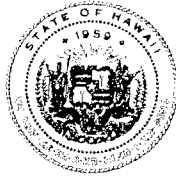
If there are any questions, please contact Nancy McPherson of our Planning Office at 620-9519 or by email at nancy.m.mcpherson@hawaii.gov.

Aloha,

A handwritten signature in black ink, appearing to read "Jobie M.K. Masagatani". The signature is fluid and cursive, with a large initial "J" and "M".

Jobie M.K. Masagatani, Chairman
Hawaiian Homes Commission

Enc.



STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

P. O. BOX 1879
HONOLULU, HAWAII 96805

September 27, 2011

Mr. Steve Prokop
Superintendent
Kalaupapa National Historic Park
P.O. Box 2222
Kalaupapa, HI 96742

Aloha Superintendent Prokop:

Subject: Department of Hawaiian Home Lands Comments on
Preliminary Alternatives, Kalaupapa General
Management Plan

Mahalo for the opportunity to provide comments on the
Preliminary Alternatives identified as part of Kalaupapa
National Historic Park's General Management Plan.

The Department of Hawaiian Home Lands (DHHL) owns
approximately 1,247 acres of land in Kalaupapa, which
encompasses the settlement area along the peninsula and
portions of the cliffs. We currently have a 50 year lease
(expiring in 2041) with the National Park Service (NPS) at an
annual lease payment of \$230,000.00.

As landowners, DHHL intends to work with NPS and participate
in its long range planning and management efforts for our
lands in Kalaupapa. DHHL understands that there are various
opportunities and constraints that exist in Kalaupapa, such
as:

- Perpetuating the legacy of Kalaupapa
- Respecting and honoring the patient community
- Protecting significant cultural and natural resources

- Recognizing the impact of canonization of Father Damien & beatification of Mother Marian Cope
- NPS interest in long term perpetuation of area
- Limited access by trail, plane, and barge
- Expensive maintenance, improvement, and new development costs
- Multi-jurisdictional management of Kalaupapa

The Preliminary Alternatives do a good job at addressing these opportunities and constraints, but after conducting Beneficiary Consultation meetings on Moloka'i and discussions with DHHL staff related to the proposed preliminary alternatives, the DHHL has these comments to offer:

MOLOKA'I ISLAND PLAN

1. The Department developed the Moloka'i Island Plan in 2005 that identifies two (2) areas (3.5 acres each) in Kalaupapa for Community Use (see attached map). DHHL recommends that the preferred alternative identify these community use areas as gathering places for cultural practices and access of native Hawaiians.
2. Identify potential existing facilities within these areas for adaptive reuse to serve the functions listed above.
3. These areas could be licensed to an organization of native Hawaiian patients or our Homestead Association(s) to manage and operate.

ACTIONS COMMON TO ALL ALTERNATIVES

1. *Resources*

- Continue to hire, train, and provide internships to engage native Hawaiians in resource management efforts
- Work with native Hawaiian schools and students (Moloka'i Schools, Kamehameha Schools, Hawaiian Immersion and Charter Schools) to provide educational experiences and opportunities in Kalaupapa

2. *Traditional Collection, Hunting, and Fishing*

- Allow for native Hawaiian gathering/access in Kalaupapa

3. *Visitor Experience*

- Identify a special access (2-3 days/weekend) period, determined by resources, to allow exclusive native Hawaiian access to Kalaupapa, while still enforcing cap of 100 visitors per day.

4. *Concessions*

- Ensure native Hawaiian preference on all concessions, contracts for goods and services, and commercial uses at Kalaupapa

5. *Facilities, Access, Transportation*

- Allow native Hawaiians preference for access/transportation via mule, foot, trail, plane, boat
- There is no mention of long term use of facilities, access, and transportation. Management, operations, and jurisdiction of these resources needs to be further defined.

6. *Management Structure, Partnerships and Agreements*

- Develop a task force made up of landowners, stakeholders, and community leaders to determine best long term management options
- Once last patient passes, explore potential utilization of health facilities for rehabilitation, kūpuna assisted living, or health care programs since facilities already exist

PRELIMINARY ALTERNATIVE SUPPORTED BY DHHL

Preliminary **Alternative B** seems to support the short and long term desires of patients, beneficiaries, and Department staff

related to the management of Kalaupapa with a few additions and edits:

- Kalaupapa is a Special Hawaiian Place. All components (resource management, cultural resources, natural resources, marine resources and fishing, traditional collection and hunting, visitor use, interpretation and education, facilities, access and transportation, concessions and commercial uses, etc.) of any alternative needs to highlight the benefits and inclusion of native Hawaiian people, history, culture.
- As a Hawaiian place, stewardship and access to natural and cultural resources is essential to our beneficiaries and native Hawaiian communities to protect and preserve cultural practices, traditions, and protocols. Please incorporate a unique native Hawaiian stewardship component for both individuals and groups into Preliminary Alternative B.
- Hire native Hawaiian Cultural Consultants made up of cultural practitioners and residents of Kalaupapa or Moloka'i to properly advise NPS on management initiatives with a "native Hawaiian lens"
- Enforce the visitor cap of 100 people per day to restrict general public, but ensure native Hawaiian preference on access.
- In the long term, allow for overnight visitation to stewardship individuals or groups only.
- Work with DHHL beneficiary community and the Department to establish a visitor information and cultural facility at Pālā'au State Park
- Long term use of facilities, primarily houses, should be investigated for potential DHHL residential uses, possibly homesteading
- Include as part of education, interpretation, and outreach, pre-settlement native Hawaiian history by hiring native Hawaiian cultural practitioner guides or previous native Hawaiian residents of Kalaupapa
- Provide management level job opportunities for native Hawaiians
- Develop a Sustainable Kalaupapa Community

Superintendent Steve Prokof
September 27, 2011
Page 5 of 5

We thank you for the opportunity to provide comment.
Kalaupapa is a special place that must be cared for by the
Department, our beneficiaries, and all of Hawai'i.

If there are any questions you can contact Mr. Kaleo Manuel of
our Planning Office at 620-9485 or by email at
Kaleo.L.Manuel@hawaii.gov.

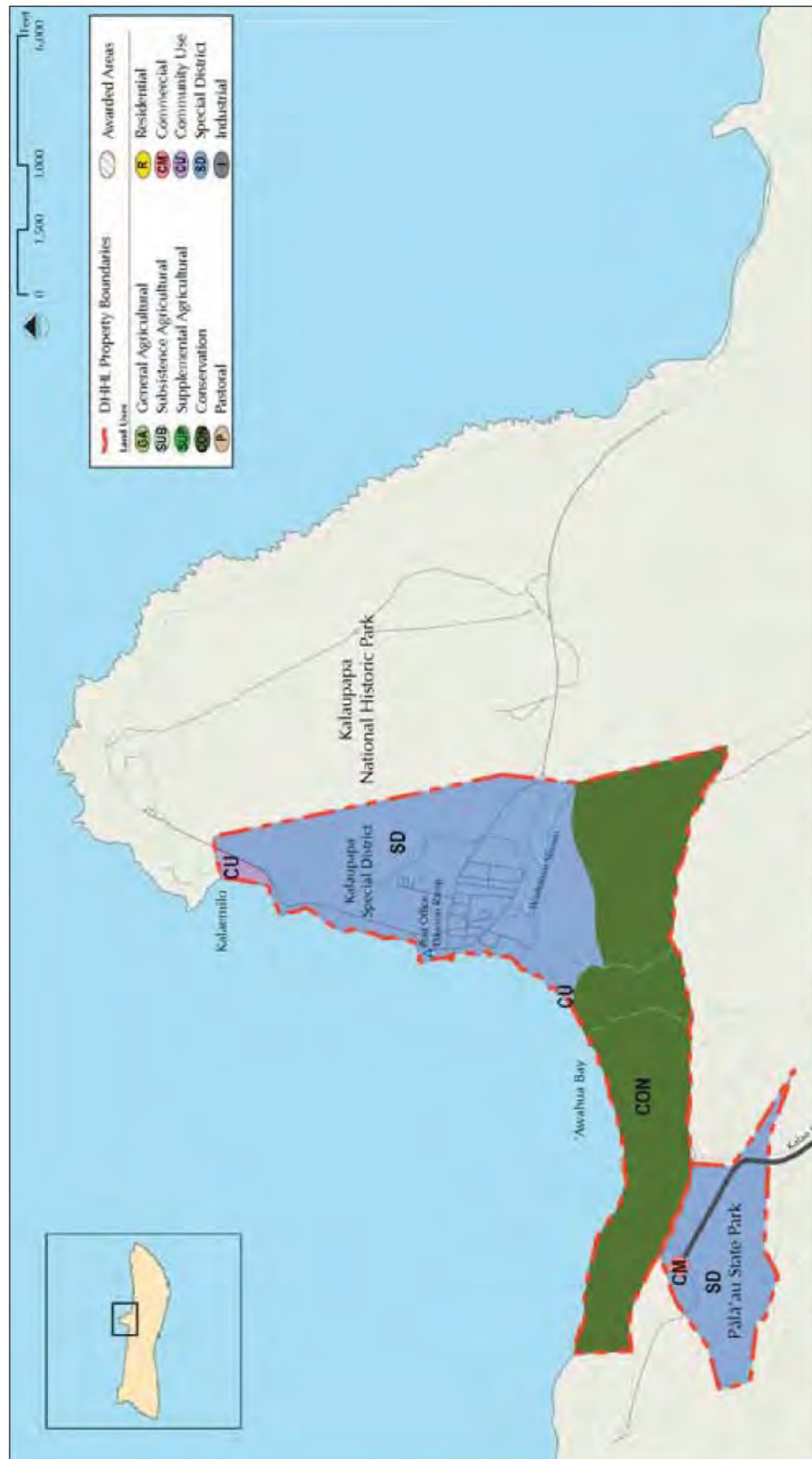
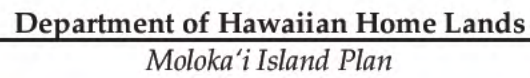
Me ke aloha,



Albert "Alapaki" Nahale-a, Chairman
Hawaiian Homes Commission

Attachment

cc: Commissioner Tancayo, Molokai
DHHL Molokai District Office



STATE OF HAWAII
DEPARTMENT OF HAWAIIAN HOME LANDS

JULY 20-21, 2015

To: Chairman and Members, Hawaiian Homes Commission (HHC)
Through: Kaleo Manuel, Acting Planning Program Manager *g*
From: Nancy McPherson, Planner *nm*
Subject: Accept Beneficiary Consultation Report, National Park
Service Draft General Management Plan for Kalaupapa
National Historic Park, DHHL TMK's (2)6-1-001:001 and
(2)5-2-013:006, Kalaupapa and Pālā'au, Molokai

RECOMMENDED MOTION/ACTION

That the Hawaiian Homes Commission (HHC) accepts this Beneficiary Consultation Report as the public record of beneficiary input and feedback relative to the National Park Service Draft General Management Plan for Kalaupapa National Historic Park, Kalaupapa and Pālā'au, Molokai.

DISCUSSION

Background

An informational submittal on this subject was presented to the HHC at its regularly scheduled meeting of June 15, 2015 (refer to Item G-1 and Exhibits, from June HHC Meeting). The submittal provided some brief historic background and a description of DHHL and National Park Service (NPS) interactions to date regarding the development of a General Management Plan (GMP) for the Kalaupapa National Historic Park (NHP).

A previous submittal was submitted to the HHC in June 2015 as a status report intended to provide an update to the HHC on the Planning Office's continued efforts to consult with beneficiaries on the Draft GMP and the timeline for the planning process moving forward. This submittal constitutes the formal Beneficiary Consultation report describing beneficiary input and feedback obtained during the two (2) consultation meetings held on Molokai on May 26 and May 27, 2015 as well as comments

received during the subsequent 30 day comment period, and is hereby submitted to the HHC for acceptance.

Beneficiary Consultation

The Department's Beneficiary Consultation Policy, approved in January 2009, recognizes that meaningful, timely and effective beneficiary consultation is essential to the successful implementation of Hawaiian Homes Commission policies, programs, and projects. The purpose of this DHHL beneficiary consultation was to collect beneficiary feedback and input on the Draft General Management Plan for the Kalaupapa NHP being circulated by the NPS for comment, therefore providing an additional venue for beneficiaries to communicate their mana'o through the DHHL Planning Office to NPS.

STEP 1. THE PROPOSED ACTION IS DESCRIBED (See Exhibit A and Item G-1 Exhibits B and C from June 15, 2015 HHC Meeting):

The Beneficiary Consultation (BC) on the Kalaupapa Draft GMP was intended to elicit comments on the actions of another agency (NPS), which has a long term lease for Hawaiian Home Lands on the Kalaupapa Peninsula as well as for a small area at the top of the cliff in Pālā'au, the Kalaupapa Overlook area, totaling approximately 1,247 acres. Two consultation meetings were held on "topside" Molokai on May 26 and May 27, 2015. Thirty-eight beneficiaries attended the May 26 evening meeting and seventeen beneficiaries attended the May 27 morning meeting. A slide presentation was prepared to describe the NPS' proposed action and the comments and concerns of beneficiaries that had been expressed to date. Handouts were also distributed at the meetings providing more detailed information, including copies of DHHL's lease with NPS.

STEP 2. BENEFICIARIES WERE NOTIFIED OF OPPORTUNITIES TO CONSULT (See Item G-1 Exhibit B from June 15, 2015 HHC Meeting):

A letter inviting Moloka'i beneficiaries to attend the May 26 and 27, 2015 BC meetings in Ho'olehua and Kalama'ula, Moloka'i was mailed out on May 12, 2015. A total of 1,618 letters were mailed to both applicants and lessees.

STEP 3. PRESENTATION MATERIALS FOR ALL MEETINGS ARE AVAILABLE FOR FEEDBACK (See Item G-1 Exhibits A and C from June 15, 2015 HHC Meeting):

Presentation materials in the form of a PowerPoint handout and a copy of the Sept. 27, 2011 DHHL letter to NPS were available at the BC meetings and were posted to the DHHL Beneficiary Consultation website. A link to the NPS Kalaupapa Draft GMP webpage was also provided on the website.

STEP 4: COMMENTS ARE COMPILED INTO MEETING REPORTS (See Exhibits B through E):

This submittal constitutes the formal Beneficiary Consultation report describing beneficiary input and feedback obtained during the two consultation meetings held on Molokai on May 26 and May 27, 2015 as well as comments received during the subsequent 30 day comment period, and is hereby submitted to the HHC for acceptance.

Summary of Beneficiary Consultation Comments and Staff Recommendations

Meeting notes were provided in the informational submittal in June (See Item G-1, Exhibits D and E from the June 15, 2015 HHC Meeting). The comment deadline given to beneficiaries at the consultation meetings was June 25, 2015. Three letters containing multiple comments, and two phone comments were received during the 30-day comment period. The following table summarizes all comments received during the beneficiary consultation meetings and sorts them by subject or topic, as well as provides any responses from DHHL and/or NPS.

Subject	Question/Comment/Suggestion	Response/Key point
Planning	Is the majority of the settlement on DHHL land?	Yes.
Planning	Need to look at all the lands, regardless of who owns them.	DHHL is taking comments on DLNR land also.
Planning	Keep what they have now - don't add anything.	No new structures are planned.
Planning	Can't issue FONSI until Section 106 process is pau.	NEPA process is incomplete until Section 106 is pau

Subject	Question/Comment/Suggestion	Response/Key point
Planning	Frustrated that NPS hasn't answered our questions from way back when. Send the big guys here from DC so they can see our frustration.	
Planning	Define "stewardship" in the General Management Plan.	DHHL will request an expanded definition of "stewardship"
Planning	Once DOH leaves, what will be jurisdictional status? DHHL needs to participate in transition plan.	DHHL needs to formalize negotiations
Planning	Limit the timeframe of the plan and make the language explicit.	DHHL requesting better definition of terms.
Planning	Need a more detailed plan for Special District lands	DHHL to work w/NPS on Implementation Plan
Planning	Need to convene a Task Force of landowners and beneficiaries.	DHHL supports this idea and will discuss with NPS
Planning	Need to plan for peninsula and Pālā'au Park - topside down and downside up.	
Planning	Have to talk about Pelekunu, Wailau, Halawa, include 'ohana from other valleys.	
Planning	Feds don't have a definition for sacred, or spiritual. Need definitions for restoration, preservation.	Some definitions provided in Glossary (Appendices)
Planning	Define "enhancement." A living culture needs a place to be exercised.	
Planning	Who should be on task force? How many on task force? What are requirements of beneficiaries? Include applicants too - NPS needs to get that right.	DHHL supports this idea and will discuss with NPS
Planning	I wish I knew the patients' recommendations and comments.	

Subject	Question/Comment/Suggestion	Response/Key point
Homesteading	There are 'iwi all over the place - shouldn't have housing, but terraces should be used, reopen the lo'i	Burials are present at Kalaupapa so extra care must be taken
Homesteading	How much acreage within Park boundary could be used?	Special District designation - limited to reuse of existing structures
Homesteading	When they first made the park, I tried to sign up for homesteading but there was no list.	Most of the land is in Special District or Conservation.
Homesteading	If homesteading is ever allowed, there will need to be rules so people will mālama that place.	DHHL to discuss beneficiary stewardship model with NPS.
Homesteading	Create a Kalaupapa Homestead Association to manage revenues. Money should be spent on homesteading.	DHHL to explore Homestead Association option with NPS
Homesteading	Primary mandate is homesteading - need to force NPS to listen.	DHHL is investigating an alternative model of "homesteading" in Kalaupapa
Homesteading	Can they take out "no homesteading" statement? Is there anything in the Plan to return the lands to DHHL someday?	Up to \$40 million invested. If lease is broken, DHHL has to pay for all improvements.
Homesteading	Mālama that 'āina vs. homesteading. Shift the focus.	Focus on stewardship.
Management	Train native Hawaiians to prepare for jobs - make sure we're benefitting.	Employment and Training Opportunities
Management	Need to consult with native Hawaiians re: respecting the culture, what's best for our kupuna down there and future generations.	Consultation
Management	If Kalaupapa is returned, it should become a self-sufficient community.	

Subject	Question/Comment/Suggestion	Response/Key point
Management	Have to respect that place - relatives buried there. Should not be opened to the public.	Burials are present at Kalaupapa so extra care must be taken
Management	Create partnerships with Hawaiian studies, archaeology, and restoration.	Educational Opportunities
Management	No Ospreys in Kalaupapa.	
Management	NPS overextending its kuleana to topside.	DLNR has a Cooperative Agreement w/NPS for area in Pālā'au State Park
Management	Need a strong partnership w/NPS for use of valleys - needs to be formalized.	DHHL needs to formalize negotiations.
Management	Fear that lifting cap of 100 visitors/day will open the floodgates. Needs to be carefully monitored.	Better explain User Capacity Indicators, Standards, Monitoring and Management Strategies
Management	Keep the 100 persons/day cap for visitors, but no limit on stewardship.	Need a hybrid Alternative
Management	Define "visitors" better. Topside homesteaders should be a special category. Prioritize categories.	Create Visitor Categories
Management	Different users should pay different fees.	Create Visitor Categories
Management	Should be different policies for us - we're not malihini.	Create Visitor Categories
Management	Who is going to be given commercial use authorization?	NPS needs to educate beneficiaries on its process
Management	Keep this place as a special sacred area for its sensitive story. Benefits to beneficiaries will always be minimal to protect the story.	Sensitive, Sacred Place
Management	Restore and use shoreline, fishpond for food production.	Develop this idea as part of transition plan

Subject	Question/Comment/Suggestion	Response/Key point
Management	What is real carrying capacity? Need to define.	Define carrying capacity
Management	Concessions need to benefit topside. Not enough level of detail in the Plan.	NPS has a process. Community benefits
Management	DHHL should be managing the buildings and getting revenue.	Buildings have to be restored up to NHPA standards.
Management	I like that patients get first say and first right of refusal.	
Management	Goal should be for 100% of NPS employees to be native Hawaiian, all from Molokai.	Employment and Training Opportunities
Management	What happens if the feds cut the budget and there is less money for Kalaupapa?	
Management	Give first preference for everything to 'ohana that were evicted from Kalaupapa when the settlement was originally established.	Create Visitor Categories
Lease	If the lease doesn't end until 2041, why are we talking about this?	DHHL is evaluating the Draft GMP and expressing your concerns to NPS
Lease	Why does DHHL issue a short term revocable lease to us, and a long term general lease to NPS?	
Lease	Amend the lease to trigger a return of Kalaupapa to DHHL when the last patient expires.	Lease Terms
Lease	Do we get a clean slate in 2041?	NPS won't reinvest if they don't get a lease extension 20 years prior.
Transition	When the time comes, what should be the mechanism?	DHHL needs to formalize negotiations.
Transition	Need to be sitting at the table with DOH re: transition.	DHHL needs to formalize negotiations.
Boundaries	Why does NPS want to enlarge park boundaries?	Required to analyze by NPS

Subject	Question/Comment/Suggestion	Response/Key point
Boundaries	Enlarging the park is offensive to me as a native Hawaiian. Feds trying to manage and control a large area of Molokai.	Do not enlarge park boundaries
Boundaries	North Shore is special to everyone on Molokai. Value of those valleys is for food production.	Do not enlarge park boundaries
Boundaries	Is Waihanau included? There's a cultural village there - heiau, lo'i.	Plan doesn't say how or who will do restoration. DHHL advocates for beneficiaries.
Boundaries	Not in favor of expansion of Park.	Do not enlarge park boundaries
Boundaries	Not in favor of land swapping or condemnation.	No land exchanges
Boundaries	Would make more sense to us to have other backside valleys - open to further acquisitions for the purpose of the HHCA.	DHHL should investigate acquiring backside valleys
Jurisdiction	What is future of Kalawao County? Let's make a Molokai County.	
Jurisdiction	Need to make sure DHHL got all the lands it was supposed to - 2,000 acres are missing.	DHHL needs to formalize negotiations.
Jurisdiction	Keep Kalawao County and place it in DHHL hands.	
Land Exchange	DHHL keep its lands!	No land exchanges
Land Exchange	What if we work through all this and we can't exchange land?	DHHL could work w/DOI to explore land exchange options
Alternatives	I like B's preservation concept, but like C's stewardship component.	Need a hybrid alternative
Facilities	Health and wellness facility for Ho'oponopono, with a preference for beneficiaries and 'ohana.	Need to work with NPS to identify areas for adaptive reuse.

Subject	Question/Comment/Suggestion	Response/Key point
Access	Need assurances of access for traditional practices - people being ticketed for surfing. Too limited now.	Restrictions on surfing are at the request of the Patient Advisory Council.
Access	There should be programs for homesteaders to grow taro in the valleys.	DHHL will work with NPS and DLNR to investigate ag & access options
Access	There needs to be more access and use of lands by beneficiaries outside of settlement area.	DHHL can work on an MOU w/NPS to ensure access.
Access	Want to walk this land, eat from the land. Must continue to restore, not just to look at it.	DHHL will work with NPS and DLNR to investigate ag & access options
Access	I really want to be able to surf down there - it's practicing my culture.	DHHL can work on an MOU w/NPS to ensure access.
Access	If surfing is allowed, it can't be commercial - has to be spiritual, pono.	DHHL to work with NPS to address this issue at transition. May be limited to a purely traditional practice.
Access	Priority for access - Kalaupapa 'ohana, all heirs and descendants.	Create Visitor Categories
Access	100 visitors max, not to include beneficiaries, Molokai residents, etc. 300 total.	Maintain visitor cap. Need a hybrid alternative
Access	Need a process for Molokai homesteaders to reserve a time to visit Kalaupapa.	DHHL to work w/NPS to develop access program
Native Hawaiian	We have a trust obligation to protect these lands and their history. Our rights are being ignored by NPS - we need DHHL to advocate.	Recognize traditional gathering rights
Native Hawaiian	Section 106 consultation not following correct process. Need more consultation.	Section 106 Consultation Inadequate

Subject	Question/Comment/Suggestion	Response/Key point
Native Hawaiian	Section 106 phone consultation too difficult - hard to participate.	Section 106 Consultation Inadequate
Native Hawaiian	Draft GMP does not discuss Article 12 Section 7 of State Constitution.	Recognize traditional gathering rights
Native Hawaiian	Need a cooperative agreement, Task Force to reestablish traditional Native Hawaiian way of life in backside valleys.	DHHL supports this idea and will discuss with NPS
Native Hawaiian	NPS needs to make a formal agreement with DOI and N/native Hawaiians, like with Umatilla Tribe.	DHHL to work with NPS on a Cooperative Agreement or MOU
Native Hawaiian	Need to use Section 106 process to raise issues.	
Native Hawaiian	Hire native Hawaiian cultural consultants now to share pre-settlement history	Employment & training opportunities
Native Hawaiian	US recognizes rights of indigenous people - advice and consent. Law of the land - they have to consult.	Recognize traditional gathering rights
Native Hawaiian	OHA could represent all Hawaiians. Talk to their policy analysts.	DHHL to meet with OHA staff.
Native Hawaiian	DHHL and OHA need to be partners in protecting our rights.	Recognize traditional gathering rights
Visitor Experience	Need to have a really good briefing and staging area.	Plan includes mandatory orientation on general rules
Visitor Experience	Also need orientation topside, but tell story of Molokai, not just Kalaupapa. Include history of homesteading.	DHHL can work w/NPS to develop educational content on homesteading.
Visitor Experience	Keep it a cultural place for our people. Without the pre-settlement history, there would be nothing.	Special Hawaiian Place

CONCLUSIONS AND NEXT STEPS

The National Park Service has considered and responded to a number of comments from beneficiaries and DHHL in the Draft GMP. However, there are some significant comments that have not yet been clearly addressed or responded to. The NPS has graciously allowed DHHL to have additional time to conduct Beneficiary Consultation on the Draft GMP and will accept comments from DHHL until July 15, 2015. A formal comment letter has been drafted and was submitted to NPS on July 15, 2015. (See Exhibit F)

A major area of concern expressed in the comments is the proposed expansion of park boundaries to include several North Shore valleys, which is perceived as a federal "land grab" with the potential to impede beneficiaries' ability to access resources for subsistence and traditional and customary practices. Also of major concern is the Draft GMP's overall lack of recognition of the protection of traditional and customary practices articulated in Article 12, Section 7 of the Hawai'i State Constitution, as well as the lack of recognition of the purposes of the Hawaiian Homes Commission Act and the rights of its beneficiaries to benefit from use of Hawaiian Home lands. The Section 106 consultation process is seen as being poorly managed and inadequate for the level of importance due the protection of the rights of n/Native Hawaiians.

Tied to these concerns are issues of access to DHHL lands and the desire for some kind of priority system so that beneficiaries and Kalaupapa 'ohana are not out-competed for access to Kalaupapa by the general public. There also is a strong desire for those 'ohana that were unwillingly displaced due to the creation of the Hansen's disease settlement to be supported in reconnecting to the lands of their ancestors. There is also a strong wish for the NPS to place more emphasis on the pre-settlement history and on grounding the visitor experience in a truly Hawaiian sense of place, history and culture.

There is concern that DHHL does not yet have a strong enough involvement in negotiations with NPS, DOH and DLNR regarding planning for the transition once no more patients are living in Kalaupapa. Beneficiaries have many questions and ideas about potential scenarios for the evolution of political jurisdiction, land exchanges or acquisitions, and ownership of existing structures and facilities. There are also many concerns and questions about the terms of DHHL's lease to the NPS and what happens as those terms come up for renegotiation.

Some conclusions and preliminary recommendations are that:

- Negotiations and discussions with state and federal agencies responsible for Kalaupapa be formalized by DHHL with the potential to result in Memoranda of Understanding and/or Cooperative Agreements;
- DHHL works with NPS and others toward the formation of a Task Force or Working Group focused on the transition plan and protection of rights of traditional and customary practices as requested by beneficiaries;
- DHHL staff consult with the appropriate staff at the Office of Hawaiian Affairs regarding the Draft GMP; and
- DHHL consult with the Attorney General's Office and the Department of Interior regarding potential jurisdictional changes and the potential for land exchange or acquisition.

RECOMMENDED MOTION / ACTION

Staff respectfully requests that the Hawaiian Homes Commission accept the recommended motion as stated.

**BENEFICIARY CONSULTATION
KALAUPAPA NATIONAL HISTORIC PARK
DRAFT GENERAL MANAGEMENT PLAN**

MAY 26, 2015 6:00 – 8:00 P.M.
LANIKEHA COMMUNITY CENTER
HOOLEHUA, MOLOKAI

AGENDA

1. INTRODUCTIONS & PULE, DINNER / MEA'AI

2. PURPOSE OF BENEFICIARY CONSULTATION

“Encourage and collect comments, input and feedback on
Kalaupapa National Historic Park Draft General Management
Plan”

3. DHHL BACKGROUND ON KALAUPAPA

4. PRESENTATION BY NATIONAL PARK SERVICE STAFF

5. EXERCISE: “I LIKE” / “I WISH” / “WHAT IF”

6. OPEN DISCUSSION

7. PAU

*For more information or if you have questions, please contact Nancy McPherson, Planner, DHHL Planning Office by phone at (808) 620-9519 or by email at nancy.m.mcpherson@hawaii.gov

TO: U.S. Department of the Interior National Park Service

FR: Blossom Feiteira
President, Association of Hawaiians for Homestead Lands

RE: KALAUPAPA NATIONAL HISTORICAL PARK
DRAFT GENERAL MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT
STATEMENT

Aloha;

My name is Blossom Feiteira and I serve as the President of the Association of Hawaiians for Homestead Lands (AHHL). We are an advocacy organization created to assist beneficiaries of the Hawaiian Homes Commission Act who are currently waiting for an award to trust lands. In addition, I am a beneficiary of the Hawaiian Homes Commission Act and a descendant of a demised resident of Kalaupapa.

Thank you for the opportunity to provide my comments and recommendations on the Draft General Management Plan and Environmental Impact Statement for Kalaupapa National Historical Park.

Your document provides four alternatives, of which the National Park Service (NPS) identifies a preferred alternative; that is Alternative C.

After careful consideration and research into existing federal legislation, rules and Executive Orders, I find some concern in all of the alternatives except alternative A.

In general, the National Park Service provides the general community with opportunities to experience nature in a way that is educational, safe and environmentally friendly. It also has a distinct purpose to its existence, that is to provide protection and management of natural areas that are unique. The National Park Service System currently has 407 different areas under the NPS system across the continental U.S. Alaska, Atlantic and Pacific accommodating over 292 million visitors in 2015 alone. Kalaupapa, in it's entirety, represents one small park that is made up of lands and shoreline that encompasses thousands of acres. However, the National Park itself is exceedingly small; less than 25 acres. Of the acres under management agreements, leases and memorandums, the NPS have established relationships with state agencies and private property owners.

As a beneficiary of the Hawaiian Homes Commission Act, and as the President of an organization working with other beneficiaries, priority concern are those lands currently in trust under the Hawaiian Homes Commission Act. Administered by the State of Hawaii's Department of Hawaiian Home Lands, approximately 1,472 acres establishes its presence in Kalaupapa. Contained within the settlement area and at

Palaʻau State Park, these trust lands have played an important role in the care and consideration for the residents of Kalaupapa and their kokua.

The presence of the Hawaiian Home Lands was noticeably silent in all of the alternatives except Alternative C – Preferred Alternative. In that presentation, the NPS states their opposition to any homesteading activity, as, according to comments received during your scoping sessions, homesteading activities are not in keeping with the purpose and intent of the NPS.

I would disagree with your assumptions. As a long time participant of planning efforts of the DHHL, there have been areas of homesteading that required a different approach to homesteading opportunities including the adoption of rules establishing a new waitlist, creation of new homesteading programs, and partnerships with beneficiary based organizations to develop alternative energy, self help housing programs and education and outreach opportunities. Kalaupapa, by its history and legacy can lead to a type of homesteading opportunity that would not only provide the NPS with needed manpower for resource management, but provide opportunities to preserve the legacy that are the memories of the residents. In addition, many beneficiaries are themselves descendants of residents, many of whom were taken away at birth. Their realization that their parents or grandparents were taken to Kalaupapa now compel them to participate in any planning process that will potentially allow them the opportunity to provide care and management of their family's final resting place, and to preserve the place in their memories.

Rather than dismiss homesteading as compatible with the plans for Kalaupapa, NPS should actively work with the DHHL and its beneficiary base for the development of a unique homesteading program for Kalaupapa. DHHL has, in the past, provided for the development of rules and policies that would better serve and address the unique circumstances of homesteading opportunities, including establishing a new wait list, and a new homesteading program.

There is a very unique community “top side” of Molokaʻi, many of whom are beneficiaries. In addition to these beneficiaries being on the DHHL waitlist, many of them are also life-long traditional resource management practitioners, carrying the knowledge of their ancestors for generations.

In the plans for resource management at Kalaupapa, having access to this “ancient” knowledge provides the NPS with a very unique opportunity to incorporate these practices in the overall management plan for Kalaupapa. From shoreline management to fisheries, to forestry, wildlife and water management techniques, the people of Molokaʻi have long put these philosophies into practice and are recognized statewide as the most active traditional practitioners in the state.

As required by P.L. 96-565, NPS is required to do three things: 1) provide residents first and native Hawaiians with the second right to refusal for economic

opportunities; 2) provide both with employment opportunities; and 3) to provide training for employment opportunities, however nowhere in your document do you outline how the NPS will implement this part of the enabling legislation.

The National Park Service in Kalaupapa is bound by this law to do this. Since your preferred alternative provides for additional staff, it would seem that the NPS currently has or will have a plan to provide these opportunities as they arise. I would recommend that, as part of the GMP, that NPS begin the process to develop that action strategy. It would seem that a marriage of some sort between the NPS and beneficiaries would be beneficial to all concerned.

In regards to statements made in your GMP regarding your lease agreement with DHHL and the costs that may be associated with the departure of NPS, \$40,000,000 seems a bit overreaching, since the NPS association with Kalaupapa has been in place since 1980. To say that DHHL will have to pay for the improvements made by NPS at the stated costs, do not take into consideration the 30 years of your presence there and your use of the same improvements, nor does it take into consideration the years of depreciation.

I believe that there can be a co-existence between the beneficiaries of the HHCA and NPS. More work needs to be done to solidify this relationship.

Another priority concern is the emphasis in the plan for providing for the visitor experience, found in great detail in Alternatives C and D.

At its current state, visitors must be sponsored by a resident, Department of Health (DOH) or the NPS. Visitors are limited to no more than 100 per day, with no visitors under the age of 16 years of age.

Recommendations found in Alternatives C and D provide no specific information on number, only that access would be managed based on policy. Yet, according to the EIS portion of your document, your "pillow count" and housing opportunities, utilities and maintenance needs will allow for a maximum of up to 300 visitors per day.

With the priority for maintaining the environment, ambience, legacy and archaeological sites of Kalaupapa, the recommendations found in Alternatives C and D would be in opposition to your statement. With a vague allusion to the management of visitor numbers based on some management policy not stated in this document, I am led to understand that while there is no minimum, there is certainly a maximum, which, given the propensity to allow for unescorted access would most certainly lead to a systematic degradation of the resources and environment. For, as much as you will purport that education will be provided through orientation activities, and a pass system will be put in place, unescorted access will lead to a casual violation of the restrictions and limitations you may put

in place. Without enforcement in place to ensure compliance, you will find visitors who come for the experience will not adhere to the rules you put in place.

While you have confidence in your ability to engage your visitors in the importance of the place, in my experience, it's those places that create the desire to "go" in an area considered off limits to "see what else is out there".

As the Executive Director of a non-profit cultural preservation organization, I see continuous occurrences when it comes to treasure hunters and "new age" practitioners seeking out special places and items that may convey the spirit of a sacred place.

Secondly, to lift the age limit also presents a potential conflict.

The existing age restrictions may be past its usefulness, as the reason for its implementation no longer exists. However, to allow for children under the age of 16, may present problems. Living in a "tourist destination" provides an insight into how our visitors manage their children, which to our chagrin, does not often happen. Children, just cannot be contained for very long, particularly in an open area, where they can run. In addition, with its cliff sides, trees, cemetery, trails and "rock piles", Kalaupapa provides a temptation that is difficult if not impossible to deny, and presents a very likely scenario for injury. Again, first hand experience with visitors who allow their children to "try" and scale trees, climb an alter or run around in an open space is a natural inclination for the parents to allow. After all, they are on vacation.

There needs to be a limitation of the number of visitors to Kalaupapa. The current limitation of 100 visitors per day should be adhered to, with an age limitation under the age of 12 years of age.

Secondly, there must not be unescorted access into any area of Kalaupapa. Escorts should be provided either with NPS staff or through a Cooperative Agreement with a beneficiary organization or another non-profit partner.

In deference to the families of the residents, there should be at least one weekend each month set aside for families of the residents to attend to their ancestor's final resting place, celebrations and gatherings with no visitors allowed. While the opportunities for overnight visits are allowed now, those overnight visits should also include the descendants during their time at Kalaupapa, and should be part of any activities that would involve restoration, clean up or other activities where additional manpower is needed.

And finally, it is disturbing to see that the work and participation of Ka Ohana O Kalaupapa has been minimized to an extent that they have. After reviewing the document, they are not even listed as a consulting party to the draft plan, and was not afforded any recognition for the last 13 years of intensive work in outreach and

education. As their primary objective was to advocate for the interests of the residents, it is an insult that the organization was treated in such a manner. The work they have accomplished to date has been exemplary, the respect and aloha they have shown to the residents is unquestionable, and their willingness and desire to work with the NPS in the preservation of Kalaupapa is by any measure, outstanding. Yet, the DGMP and EIS chose to not include their commitment and dedication and instead, opts to appropriate their work and assume it as a new introduction of work that the NPS will implement.

The NPS should as a matter of efficiency, focus their efforts on the preservation of Kalaupapa and work with Ka Ohana O Kalaupapa in the area of education and outreach. You are able to do so through either a Programmatic Agreement (PA) or a Cooperative Agreement (CA). This partnership will enable the NPS to garner the much needed community support in your efforts to retain the physical and spiritual environment that is Kalaupapa, expand your ability to share the history of the place, and most importantly for AHHL, to preserve the memories of the residents of this very special place.

In closing, even with the stated concerns, Alternative C is an option that most addresses the management issues that NPS has faced these many years. However, the concerns stated here while applicable in all of the alternatives, they are also most prevalent in Alternative C. As a result, while you are working on the development of the final document, please consider these recommendations.

AHHL extends its appreciation for allowing us to submit our comments on the Kalaupapa National Historic Park Draft General Management Plan and Environment Impact Statement.

Mahalo ia oukou,

/s/

Blossom Feiteira

President

Association of Hawaiians for Homestead Lands